

I hereby give notice that a Submissions Hearing meeting will be held on:

Date: Tuesday 31 May 2022
Time: 9.00 am
Meeting Room: Tasman Council Chamber
Venue: 189 Queen Street, Richmond

DELIBERATIONS

Future Development Strategy

ATTACHMENTS

ITEM	PAGE
3.1 Deliberations Hearing - Nelson Tasman Future Development Strategy 2022-2052	
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Hearing Schedule for the Submissions on the Draft Nelson Tasman Future Development Strategy

Wednesday, April 27,
2022

Attended Online via Zoom (29 Speakers)

Start Time	Duration	Speaker (Submission ID)
9:10 AM	(10 mins)	Mr Tony Haddon (31138) Save the Maitai Incorporated
9:20 AM	(10 mins)	Mr Alvin Bartley (31112) (ABSENT)
9:30 AM	(10 mins)	Ms Karen Gilbert (31140) (WITHDRAWN FROM SPEAKING)
9:30 AM	(10 mins)	Mr Steve Cross (31363)
9:40 AM	(10 mins)	Libby Newton (31141) (WITHDRAWN FROM SPEAKING)
9:50 AM	(10 mins)	Paul Jonkers (31156)
10:00 AM	(10 mins)	Mr Donald Horn (31267)
10:10 AM	(10 mins)	Ms Elizabeth Dooley (31273)
10:20 AM	(10 mins)	Dr Monika Clark-Grill (31443) (WITHDRAWN FROM SPEAKING)
10:20 AM	(10 mins)	Ms Gretchen Holland (31395)
10:50 AM	(10 mins)	Dr Elspeth Macdonald (31296)
11:00 AM	(10 mins)	Mr Duncan Macnab (31298)
11:10 AM	(10 mins)	Mrs BARBARA AND TIM ROBSON (31322)
11:20 AM	(10 mins)	Dr David Jackson (31447) (WITHDRAWN FROM SPEAKING)
11:20 AM	(10 mins)	Ms Jo Gould (31769)
11:30 AM	(10 mins)	Wendy Barker (31554) - Tony spoke on behalf of Wendy
11:40 AM	(10 mins)	Mr Steve Richards (31276) Jester House
11:50 AM	(10 mins)	Mr Brian Hawthorne (31324)
12:00 PM	(10 mins)	Mr Roger Frost (31423)
12:10 PM	(10 mins)	Mr David Bartle (31452) consultant
12:20 PM	(10 mins)	Mr Joseph Blessing (31369) Yes Aotearoa
1:20 PM	(10 mins)	Ms Maree Sharland (31366)
1:30 PM	(10 mins)	Mrs Pauline Miller (31482) (WITHDRAWN FROM SPEAKING)
1:30 PM	(10 mins)	Mr Alan Hart (31716)* (ABSENT)
1:40 PM	(10 mins)	Mr Vincent Riepen (31511)
1:50 PM	(10 mins)	Ms Helen Black (31514)
2:00 PM	(10 mins)	Mr Bruce Gilkison (31439) Zero Carbon Nelson Tasman Inc.
2:10 PM	(10 mins)	Carsten Buschkuhle (31524) Tasman Bay Estates
2:20 PM	(10 mins)	Mr Ian McComb (31549) Small Time Developments Ltd

2:50 PM	(10 mins)	Raine Oakland Estates (31547) c/- Planscapes nz Ltd (Attn: Jane Hilson)
3:20 PM	(10 mins)	Jennifer Rose (31807) Kainga Ora - Homes and Communities
3:30 PM	(10 mins)	Dr Patrick Conway (31651)
3:40 PM	(10 mins)	Mr Paul Davey (31612)
3:50 PM	(10 mins)	Ms Lucy Charlesworth (31623)
4:00 PM	(10 mins)	Mr Daniel Levy (31628)
4:10 PM	(10 mins)	Mrs Joy Shackleton (31631)
4:20 PM	(10 mins)	Mr John Paul Pochin (31701) Moved to Fri 29 th

Hearing Schedule for the Submissions on the Draft Nelson Tasman Future Development Strategy

Thursday, April 28, 2022 Attended Online via Zoom (35 Speakers)

Start Time	Duration	Speaker (Submission ID)
9:10 AM	(10 mins)	Ms Joni Tomsett (31569)
9:20 AM	(10 mins)	Mr Doug Hattersley (31405)
9:30 AM	(10 mins)	Mr Hamish James Rush (31419) Aporo Orchards Ltd (moved to 4:40pm)
9:40 AM	(10 mins)	Mr Jon Taylor (31420)
9:50 AM	(10 mins)	Mr Alan Eggers (31435) Falcon Ridge Estate Ltd
10:00 AM	(10 mins)	Dr Bruno Lemke (31625) (Rescheduled to Fri 29 th)
10:10 AM	(10 mins)	Mr David Bolton (31574) (ABSENT)
10:20 AM	(10 mins)	Mr Matt Olaman (31461)
10:50 AM	(10 mins)	Ms Jane Murray (31512) Nelson Marlborough Health
11:00 AM	(10 mins)	Bob Kennedy (31513) Golden Bay branch Forest and Bird spoke with Cynthia.
11:10 AM	(10 mins)	Mr Richard Clement (31530)
11:20 AM	(10 mins)	Ms Charlotte Watkins (31586)
11:30 AM	(10 mins)	Ms Rebecca Hamid (31539) River Road Company Limited
11:40 AM	(10 mins)	Mrs Melanie Drewery (31542)
11:50 AM	(10 mins)	Mr Tim Bayley (31723)
12:00 PM	(10 mins)	Dominic Williams (31448)
12:20 PM	(10 mins)	Ms Sandy Armstrong (31730)
1:20 PM	(10 mins)	Mr Martin Hudson (31134)
1:30 PM	(10 mins)	Mr Jack Bauer (31204)
1:40 PM	(10 mins)	Dr Lou Gallagher (31559) Mapua and Districts Community Association, Wildlife Corridors Subcommittee
1:50 PM	(10 mins)	Mrs Jean Gorman (31263)
2:00 PM	(10 mins)	Mr Matt Taylor (31271)
2:10 PM	(10 mins)	Mr Richard Osmaston (31293) Money Free Party NZ
2:20 PM	(10 mins)	John Heslop (31316) Cotton & Light Ltd - Rob Ford spoke on behalf.
2:30 PM	(10 mins)	Dr Ann Briggs (31325)
2:40 PM	(10 mins)	Mr Steve Anderson (31343)
2:50 PM	(10 mins)	David Short (31386) Tasman Area Community Association

3:20 PM	(10 mins)	Timo Neubauer (31540) NelsonTasman2050
3:30 PM	(10 mins)	Mr Timo Neubauer (31566)
3:40 PM	(10 mins)	Mr Jan Heijs (31494)
3:50 PM	(10 mins)	Mr William Samuels (31593) William Samuels Architects
4:00 PM	(10 mins)	Ms Magdalena Garbarczyk (31564)
4:10 PM	(10 mins)	Geoffrey (Jim) Vause (31515), speaking with Annette LeCren (31148)
4:20 PM	(10 mins)	Mr J Santa Barbara (31457)
4:30 PM	(10 mins)	Mr Steve Malcolm (31674) Malcolm Consortium
4:40 PM	(10 mins)	Mr Hamish James Rush (31419) Aporo Orchards Ltd
4:50 PM	(10 mins)	Mrs Miriam Lynch (31117) - Mike Lynch spoke on behalf of Miriam

Hearing Schedule for the Submissions on the Draft Nelson Tasman Future Development Strategy

Friday, April 29, 2022

Attended Online via Zoom (19 Speakers)

Start Time	Duration	Speaker (Submission ID)
1:10 PM	(10 mins)	Mrs Olivia Neubauer (31605)
1:20 PM	(10 mins)	Mrs Sarah Whittle (31407)
1:30 PM	(10 mins)	Mark Lile (31776) CCKV & Bayview Nelson Ltd
1:40 PM	(10 mins)	Mark Lile (31750) Wakefield Developments Ltd
1:50 PM	(10 mins)	Eleanor Greenhough (31767)
2:00 PM	(10 mins)	Dr Bruno Lemke (31625) MDCA and NTCF
2:10 PM	(10 mins)	Mr Stephen (Steve) Hayden (31641) Hayden Payne Hutton Partnership
2:20 PM	(10 mins)	Mr John-Paul Pochin (31701)
2:30 PM	(10 mins)	Ms Jacquetta Bell QSM (31632) Friends of the Maitai (Tom Kennedy will speak)
2:40 PM	(10 mins)	Ms Jacquetta Bell QSM (31633)
2:50 PM	(10 mins)	Ms Brenda Wraight (31654) BK Wraight Consulting
3:20 PM	(10 mins)	Mr Peter Taylor (31670)
3:30 PM	(10 mins)	Heather Wallace (31669) Friends of Golden Bay
3:40 PM	(10 mins)	Mr Mathew Hay (31677) Fineline Architecture
3:50 PM	(10 mins)	Mr Lindsay Wood (31705) Resilienz Ltd
4:00 PM	(10 mins)	David Ayre (31708)
4:10 PM	(10 mins)	Mrs Suzanne O'Rourke (31715) Fonterra (speaking with Robb Stephens)
4:20 PM	(10 mins)	Trevor Chang (31722)
4:30 PM	(10 mins)	Mr Yachal Upson (31624)
4:40 PM	(10 mins)	Mr Ray Hellyer (31733) (Absent)

Hearing Schedule for Submissions on the Draft Nelson Tasman Future Development Strategy

Tuesday, May 3, 2022

Attended Online via Zoom (36 Speakers)

Start Time	Duration	Speaker (Submission ID)
9:10 AM	(10 mins)	Mr & Mrs Rose & Phillip Windle (31309) Windle Bros Ltd (WITHDRAWN FROM SPEAKING)
9:20 AM	(10 mins)	Cynthia McConville (31455)
9:30 AM	(10 mins)	Renatus Kempthorne (31507) (Absent)
9:40 AM	(10 mins)	Mr John Jackson (31726) (WITHDRAWN FROM SPEAKING)
9:50 AM	(10 mins)	Mr Robin Whalley (31351) - (spoke at 10:50am)
10:00 AM	(10 mins)	Mr Luke Jacobsen (31642) (WITHDRAWN FROM SPEAKING)
10:10 AM	(10 mins)	Mrs Sonja Antonia Lamers (31609) Homes for Wakefield, subcommittee Wakefield Community Council* Joined by Tim & Richard.
10:20 AM	(10 mins)	Nick Clarke (31724) Habitat for Humanity (WITHDRAWN FROM SPEAKING)
10:50 AM	(10 mins)	Joan Butts (31714) Port Tarohe Services Limited (Dan Hames may speak on behalf) - Spoke at 9:40am
11:00 AM	(10 mins)	Dan Hames (31826) Port Tarohe Services Ltd Spoke at 9:50am
11:10 AM	(10 mins)	Chris & Gill Knight (31746) – Spoke at 11:05AM
11:20 AM	(10 mins)	Mrs Alison Pickford (31211)
11:30 AM	(10 mins)	Mr Michael Mokhtar (31687)
11:40 AM	(10 mins)	Ali Howard (31790)
11:50 AM	(10 mins)	Mr Mark Morris (31614) Richmond Baptist Church
12:00 PM	(10 mins)	Peter Olorenshaw (31791) Nelson Transport Strategy Group Inc.
12:10 PM	(10 mins)	Mr Colin Garnett (31388)
12:20 PM	(10 mins)	Debbie Bidlake (31820) Federated Farmers New Zealand*
1:20 PM	(10 mins)	Gary Clarke (31595)
1:30 PM	(10 mins)	Joe Roberts (31662)
1:40 PM	(10 mins)	Mr Andrew Spittal (31809) Spittal Properties Limited
2:10 PM	(10 mins)	David & Vicki James (31541)
2:20 PM	(10 mins)	Chris A Freyberg (31685)
2:30 PM	(10 mins)	Joanna Santa Barbara (31636) Nelson Tasman Climate Forum

2:40 PM	(20 mins)	Mrs Rowena Smith (31552) Ngāti Apa ki te Rā Tō Charitable Trust - Hayden Taylor spoke with Rowena Smith
3:20 PM	(10 mins)	Mr Gaire Thompson (31853)
3:30 PM	(10 mins)	Jackie McNae (31819) Ahimia Ltd, R & S Griffin, M & L Griffin & R Griffin
3:40 PM	(10 mins)	Jackie McNae (31803) S & D King
3:50 PM	(10 mins)	Jackie McNae (31821) W J & E L Lynch
4:00 PM	(10 mins)	Jackie McNae (31814) Pharmalink Extracts Limited & New Zealand Hops Limited
4:10 PM	(10 mins)	Jackie McNae (31811) Dyson Nominees & Mahau Properties
4:20 PM	(10 mins)	Jackie McNae (31804) N & S McCliskie
4:30 PM	(10 mins)	Jackie McNae (31806) Projects & Ventures Ltd
6:00 PM	(10 mins)	Jackie McNae (31813) Richmond Pohara Holdings Ltd
6:10 PM	(10 mins)	Ms Joanna Hopkinson (31754)
6:20 PM	(10 mins)	Nic John & Jo Tuffery (31834)
6:30 PM	(10 mins)	Mr David Lucas (31777)
6:40 PM	(10 mins)	Mrs Julie Sherratt (31779)
6:50 PM	(10 mins)	Ben Williams (31808) Radio New Zealand Ltd (ABSENT)
7:00 PM	(20 mins)	Mrs Kerensa Johnston & Iain Sheves (31700) Wakatū Inc & NRAIT (joint submission)
7:20 PM	(10 mins)	Mr Paul McIntosh (31684)
7:30 PM	(10 mins)	Ms Susan Drew (31571)



MINUTES
of the
SUBMISSIONS HEARING MEETING

held
9.00 am, Wednesday, 27 April 2022
9.00 am, Thursday, 28 April 2022
1.00 pm, Friday 29 April 2022
9.00 am, Tuesday 3 May 2022

at
Tasman Council Chamber, 189 Queen Street, Richmond
Topic: Future Development Strategy Hearings

- Present:** Nelson City Council – Mayor R Reese, Deputy Mayor J Edgar and Councillor B McGurk
Tasman District Council – Deputy Mayor S Bryant, Councillor K Maling and Councillor D Ogilvie
Iwi representative – Ina Kumeroa Kara-France
- In Attendance:** Tasman District Council – Group Manager – Service and Strategy (S Edwards), Environmental Policy Manager (B Johnson), Urban Growth Coordinator (J Deans), Policy Planner (M Bengosi), Executive Assistant to the Mayor (R Scherer), Executive Support Officer (A Brough),
Nelson City Council – Group Manager Environmental Management (C Barton) and Senior Analyst – Strategy and Environment (C Pawson), Administrator (T Johnson), Councillor G Noonan and Councillor R Sanson
- Part Attendance:** Tasman District Council – Executive Support Officer (G Drummond), Strategic Policy Manager (D Fletcher), Project Manager – Environmental Policy (A McKenzie), Senior Infrastructure Planning Adviser (D Bryant), Consent Planner – Subdivisions (B Wayman), Senior Infrastructure Planning Advisor – Water & Wastewater (K Arnold) and Communications Officer (T O'Connell)

1 OPENING, WELCOME

Group Manager - Service and Strategy, Susan Edwards welcomed everyone to the meeting and opened the meeting with a karakia. She advised the Hearing Panel that they are required to elect a Chairperson and Deputy Chairperson. The following was resolved:

Moved Cr B McGurk/Cr D Ogilvie

SH22-04-1

That the Joint Subcommittee elects Mayor Rachel Reese as the Chairperson and Deputy Mayor Stuart Bryant as the Deputy Chairperson for the Future Development Strategy Submission Hearings.

CARRIED

Chairperson, Mayor Reese welcomed everyone to the meeting and briefed the attendees on housekeeping matters including the timing allowed for each submitter to speak to their submission.

Nelson City Council Group Manager, Environmental Management, Clare Barton and Ms Edwards confirmed that all of the legislative requirements for the hearing had been met by both councils.

Chairperson, Mayor Reese welcomed Ina Kumeroa Kara-France, the Mātauranga Māori representative on the hearing panel. Ms Kara-France presented her pepeha.

The panel members and supporting staff in attendance introduced themselves to the Hearing Panel.

2 APOLOGIES AND LEAVE OF ABSENCE

There were no apologies.

3 DECLARATIONS OF INTEREST

Tasman District Council Deputy Mayor, Stuart Bryant noted that he owns land adjoining the proposed greenfields expansion at Wakefield (site T108). He did not believe this was a conflict of interest.

3 REPORTS

3.1 Draft Nelson Tasman Future Development Strategy 2022-2052 Submissions Report

Tasman District Council Urban Growth Coordinator Jacqui Deans and Nelson City Council Senior Analyst – Strategy and Environment, Chris Pawson presented the report which was taken as read.

Moved Deputy Mayor Bryant/Mayor Reese

SH22-04-2

That the Future Development Strategy Subcommittee:

- 1. receives the Draft Nelson Tasman Future Development Strategy 2022-2052 Submissions Report RSH22-04-2; and**
- 2. agrees to accept the late submissions from Peter Wilks (submitter #31815), Robert Wilks (submitter #31823), Paula Wilks (submitter #31836), Nic John and John Tuffery (submitter #31834), Ian Wishart (submitter #31835), Bradley Trott (#31851), Cameron Sims (#31852), Bev Armstrong (#31841) and Gaire Thompson (#31853); and**

3. receives the 558 submissions on the draft Future Development Strategy contained in Attachments 3–6 to this report.

CARRIED

4 HEARING OF SUBMISSIONS

Wednesday 27 April 2022

Mr Tony Haddon (31138) and Save the Maitai

Mr Haddon spoke on behalf of himself and the Save the Maitai group. He noted:

- That 182 submitters had requested that the proposed development in the Maitai Valley be removed from the Future Development Strategy (FDS).
- The public's previous requests regarding any development in the Maitai had not been accepted by Nelson City Council.
- The petition presented in 2020 is a living document with over 13,000 signatures. The group has still not had a response to the petition from Nelson City Council.
- The hazard overlays in the Maitai area.
- The Save the Maitai group is not a group of NIMBYs – the group is trying to protect the Maitai Valley.
- Mr Haddon asked the hearing panel to remove any land within the Maitai Valley from the FDS.

Mr Alvin Bartley (31112)

Mr Bartley did not appear.

Steve Cross (31363)

Mr Cross used a powerpoint presentation to present his submission. Mr Cross noted that:

- Tahunanui is ripe for development, but there is no vision for Tahunanui.
- There is not a need for such high density of development in Tahunanui and in his view it will destroy the area.
- There are major flaws with the key assumptions on the intensification uplift (uptake) factor in the FDS document.
- The uptake rate reduced from 30% to 15% and he questioned why this had occurred.
- Mr Cross suggested that the analysis used in the 2022 FDS does not stack up.
- He referred to the recommendations made by Sense Partners which, he believes, have not been appropriately applied in the FDS.
- He suggested that there is a huge disconnect between the housing and business capacity report with the FDS.
- The 15% uptake figure lacks any basis.

Paul Jonkers (31156)

Mr Jonkers expressed several concerns:

- Nelson City Council is promoting a housing strategy that goes against the climate emergency position of Nelson City Council.
- An increasing urban sprawl will result in a higher CO₂ footprint.
- Why would the Council build in an area that is accessed via a flood plain, ie the Maitai Valley.
- The proposed development in Kaka Valley will include elevated building platforms to alleviate flooding but that will shift the flooding issue downstream.
- Development threatens to degrade the Maitai River.
- Referred to the importance of the Maitai Valley to future generations.
- Time to make your lasting mark, great leadership is one that can change its mind. Now is the time.

Mr Donald Horn (31267)

Mr Horn concentrated his submission on the proposal to create a new settlement at Tasman. He noted that:

- The proposal in the vicinity of Tasman village will affect a large amount of residents who have had no opportunity to consider the impacts.
- There is no integration between land use, transport and growth in areas that are in close proximity to employment.
- There are no local services, employment or local public transport.
- Motueka soils are versatile and important for horticultural crops and these are even more important with climate change.
- The Tasman proposal does not meet the criteria for greenfield development.
- Motueka is facing sea level rise challenges.
- Intensification should be the major driver for population growth and there are many examples where intensification would be successful to maximise the use of space sympathetically.

Councillor McGurk left the meeting at 9.59 am.

Ms Elizabeth Dooley (31273)

- Ms Dooley spoke against the proposal to develop greenfield sites in the Maitai Valley.
- She suggested that once any greenfield development occurs in the Maitai Valley it will never end.

Councillor McGurk rejoined the meeting at 10.01 am.

- Ms Dooley said that the Maitai Valley is a place of safety and renewal.
- The Maitai Dam and the forestry plantation have been bad enough.
- She urged the Panel to keep the Maitai Valley as it is.

Ms Gretchen Holland (31395)

Ms Holland spoke about her concerns regarding the development of the Kaka Valley/Maitai area. She asked that representatives of both councils listen to her concerns and instruct staff to remove the Kaka Valley/Maitai Valley from the FDS.

Key concerns are:

- Noise from the extra cars resulting from the development. There is an agreement that logging trucks do not travel along the valley at certain times and they travel at 40km/hr. Will the people living in the new development also abide by those rules? Vehicles are an issue for the school and child safety.
- Water quality will be affected by the development. It will affect the swimming hole which is an important recreation area.
- Project Mahitahi (Nelson City Council) – Ms Holland suggested that Councillors need to revisit the information in this project.
- Maitai ecological restoration plan – iwi, Department of Conservation (DoC), Government and community groups are spending a lot of money on restoring the area which will be affected by the development.
- Investment in new open spaces will be needed to deal with intensification. If you take out Kaka Valley and Maitai Valley from the FDS then you won't need more open space areas.

The meeting adjourned at 10.21 am and resumed at 10.48 am.

Dr Elspeth Macdonald (31296)

Dr MacDonald spoke about:

- Housing intensification in Nelson, specifically in the Wood.
- Nelson is a high density zone, 40% site coverage, other areas are 30%, maximum of 44%.
- Battle axe blocks and private ways in the Wood are very intensive already with infill housing.
- Concern about developers buying up sections for development.
- Intensification is squared, more intensification on top of what is already in place.
- What happens to the liveability, the internal and exterior amenities and the quality of life for existing residents?
- Effect on sunshine and daylight to adjoining sites with intensification – casting shadows. What are the costs of losing sunshine if you proceed with growth and intensification in The Wood – quality of life, mental and physical wellbeing of existing residents. She noted that 2.4% of a properties value is lost for every hour of sun lost.

Mr Duncan MacNab (31298)

Mr McNab noted that:

- He favours intensification of housing in Nelson, and he favours Kaka Valley development.
- He also favours amalgamation of both councils, if not, both councils should work for the common good to make savings.
- The Lower Maitai is his playground – he is bothered by the emotive campaigns against development.
- Misleading information is being circulated. The anti Maitai Valley group is not proposing any solutions to the issues of growth, urban sprawl and transport clogging; Mr McNab referred to NIMBYism.

- Decisions about intensification are difficult and challenging. The councils are making the decisions on behalf of our children and grandchildren. He asked the councils to have courage and make good long term decisions.
- Housing intensification is critically important, we cannot afford to put housing on fertile land. If we do we will eventually be forced to import our fruit and vegetables. We need to eat locally and take food miles seriously.
- Any future land for housing should be low value land, Kaka Valley meets that requirement.
- We need to keep up with demand for new housing by intensification. Also people need to live close to their employment and we need to mitigate climate change issues. Kaka Valley meets those requirements.
- He encouraged the councils to continue improving cycling facilities.
- Being serious about the issues our planet faces won't be easy but they need to be addressed.

Mrs Barbara Robinson (31322)

Mrs Robinson referred to:

- The recent UN Secretary General – IPCC report – we live in a dire world.
- The FDS has a slightly modified business as usual approach, it is not looking into the future.
- Climate change issues, for example the damage done in Tarawhiti in recent months.
- The Insurance Council says we should put money aside to address the impact of climate change, eg repeat flooding events show we cannot just keep repairing flooded areas.
- Dynamic Adaptive Pathways Process – councils need to use these principles now.
- Mismatch between outcomes and green speak with the aims of the FDS.
- The National Policy Statement on Urban Development focuses on the need to address the effects of climate change.
- There is nothing about zero carbon emissions in the FDS.
- The FDS is not robust – it refers to a 30 year timeframe, we need to make structures last for at least 100 years, safe from sea level rise, flood and fire, with the potential for managed retreat.
- Greenfield and low density development is not efficient and encourages high emissions behaviour in terms of transport options.
- FDS does not meet the outcome of reducing emissions.
- Intensification needs to happen faster. Councils are responsible for promoting it.
- Scale of development proposed in the FDS does not meet our commitments to climate change.
- We need courageous government (both local and national) to act now to future-proof our region.

Jo Gould (31769)

Ms Gould has lived in central Nelson for over 30 years alongside the Maitai River. She spoke about:

- The value of the environment around the Maitai River with its heritage homes, leafy open space feeling and a safe neighbourhood.
- Integrating dedicating cycle routes into planning is critical. Also easy access to all to our parks and open spaces.
- Concerned about the potential impact of the Kaka Valley development on water quality in the Maitai River. Councils need to look after our water quality, our special places and our environment.
- Intensification – agree with intensifying already built up areas especially in central urban areas, prefers that to greenfield development.
- The irreversible loss of productive soil from urban development.
- The detrimental effects of high rise residential housing. She does not support development of up to 6 storeys. Supports mixed use development in the Nelson and Richmond Central Business Districts (CBD).
- Urge you to consider core part of your thinking, what makes us special at the moment and how can we make it more special in the future.

In response to questions, Ms Gould suggested that the councils could consider places like Fairfield Park and Neale Park for residential development. She also noted her concerns that a proliferation of multi-storey buildings could be very impactful both on the character and the amenity value of current residential areas.

Wendy Barker (31554)

Tony Stallard represented Mrs Barker. He noted:

- It is important that both councils have a permanent record of the hearing panel discussions so they can be referred to when the councils need to make decisions.
- The significance of the Maitai Valley must be preserved for the next generation(s).
- Concerned about greenfields development in the Maitai Valley.
- Ability to intensify with mixed use (business/residential) development in the inner city centre should be part of the FDS. Bulldoze Nelson city centre and start again. Take a bold approach.
- Look at ownership of the city centre and consider options to rezone land for housing. It will revitalise the city centre and there is the ability to intensify the area.
- If you want to build in the Maitai Valley, why not build on the Council-owned golf course.
- Mr Stallard referred to Tasman's Great Taste Trail as the great urban sprawl trail, the taste has gone out of it. In his recent experience, a significant number of food places were closed. The focus of the Trail is changing, the councils are allowing urban sprawl along it.
- Ad hoc planning, it is not robust, the councils haven't taken into account the required infrastructure. Need an integrated infrastructure plan.
- Any development of Maitai Valley will be a disaster. It's our playground.
- Be innovative in your thinking of how you proceed.

Mr Steve Richards (31276)

Mr Richards spoke about:

- His support to both councils for taking the opportunity to look to the future, although the 30 year timeframe is not long enough, he prefers multi-generational planning.
- The councils should not be looking at any development outside current urban areas.
- The FDS does not consider any climate change ramifications.
- The loss of productive land specifically with the secondary proposed greenfields development near Tasman village. He urged both councils to protect the productive land and to remove the secondary proposal from the FDS.
- His understanding is that the councils are required to provide a certain amount of land for development but he suggested that be achieved by intensifying current urban centres.
- The FDS proposal needs to concentrate on the impacts of climate change and sea level rise.

Mr Brian Hawthorne (31324)

Mr Hawthorne lives on the Moutere Highway and was previously a berryfruit and sheep farmer. He spoke about:

- His concerns for the use of horticultural land for housing, specifically in Braeburn (site T136) and near Tasman village.
- Any proposed development would bring transportation, traffic congestion, greenhouse gas emissions and climate change issues.
- There are no employment opportunities in the Tasman settlement so people will travel to Nelson to work.

He urged the hearing panel to decline any application for housing in Tasman and to lobby the New Zealand Transport Agency to improve Tasman's highways.

Dr Roger Frost (31423)

Dr Frost:

- Noted his support for the proposed residential development in Murchison.
- Expressed concern about the area marked for business development which may detract from the aesthetic value of the land.
- Suggested that a marginal strip of suitable land be excluded to allow for a buffer along State Highway 6 in Murchison.
- Suggested that industrial and business activity on main streets doesn't contribute to the natural landscape.
- Urged the councils to use the FDS as an opportunity to protect the outstanding natural landscapes around Murchison.

Mr David Bartle (31452)

Mr Bartle noted that he is a valuation consultant and former diplomat, living near Brightwater. Mr Bartle commented:

- He agrees with most of the proposed outcomes, and appreciates the work to help us make some hard choices.
- The FDS should also include risk management including long term effects on rates and identify who carries the consequences of those risks.

- Financial sustainability and full lifecycle costs should be considered.
- Who will pay for costs for development – some will require significant infrastructure costs. Who will pay for them?
- Favours housing intensification.
- The councils should work together to provide social housing / affordable housing.
- FDS should not encourage greenfield housing development, it should protect our agricultural land, and look to reduce CO₂ emissions.
- Need to consider the key risks and the long term effect on future ratepayers with what you are proposing especially in terms of the required infrastructure. There is a lack of infrastructure and community facilities outside the main centres.
- Focus on high quality intensification.
- The councils need to use Stats NZ figures to help them make any decisions, jobs need to be accessible to where people live.
- Urban regeneration can have many different forms but there are other areas where councils have struggled to meet social needs. He noted there is scope for both councils to collaborate on a new organisation for urban regeneration and social housing. We want to see everyone in our communities well housed.
- In terms of the financial risk of greenfield housing, he urged the councils to do more high level analysis and financial modelling based on what has been learnt from recent developments, where are the costs and who pays for them?

Ms Maree Sharland (31366)

Ms Sharland spoke about:

- Her opposition to greenfield housing in the Maitai Valley. Allowing house development in the Maitai will be the thin end of the wedge. The Maitai is synonymous with Nelson.
- The Council has no mandate to pursue urban sprawl into the valley.
- Councillors need to take a stand. Don't let developers dictate the use of land in Nelson.
- Let's create green belts that cannot be built on and protect them for future generations.
- Urban sprawl is a major threat to the planet.
- Look at successes and failures around the world.
- Let's create a liveable town.

The hearing adjourned at 12.29 pm and resumed at 1.25 pm.

Mr Joseph Blessing (31369) - Yes Aotearoa

- Mr Blessing asked the panel to make provision in the Future Development Strategy to enable community living.
- In his experience there is real value in having multiple houses on one piece of land – it works.
- Community living provides possibilities to have a common structure and is also more affordable for young people.

Alan Hart (31716)

Mr Hart did not appear.

Mr Vincent Riepen (31511)

Mr Riepen focused on the issue of healthy homes.

- He noted that 48% of New Zealand homes are insufficiently insulated.
- He expressed his concerns that the high-rise intensification housing proposed in the FDS will exacerbate current insulation and ventilation issues which are detrimental to people's health.

Ms Helen Black (31514)

Ms Black outlined her concerns about the proposed housing development in the Maitai Valley.

She spoke about:

- Growing up in Stockholm, Sweden where she lived in several high rise buildings – these buildings were close to parks and recreation areas.
- The footprint of housing compared with green areas needs to change in New Zealand.
- Ms Black highlighted the affordability of today's housing.
- Concerned about water quality, noise pollution and the impact of growth in traffic.
- Regular walking in green spaces enhances our mental health and reduces depression.
- Challenge the panel to ponder how much urban sprawl is acceptable, what can we do differently, are natural areas important to you? If so, how do you safeguard this land for the future?

Mr Bruce Gilkison - Zero Carbon Nelson Tasman - (31439)

Mr Gilkison spoke about the need to consider climate change in the FDS:

- Zero Carbon Nelson Tasman is focused on finding resolutions to the climate crisis.
- Concerned that FDS cannot achieve the outcomes proposed in terms of greenhouse gases and climate change.
- We need to play our part in meeting the Government's climate change strategy.
- The planning proposed in the FDS will increase climate change emissions.
- Should aim to get halfway to zero carbon emissions in the next decade.
- Climate change is not just an environmental issue, it's an "everything" issue.
- No mention of the value of trees in the FDS. They are almost the only means of offsetting our carbon emissions. They have a number of other benefits that help us in our daily lives. Trees should be one of the strategy's priorities. Tasman is losing more and more trees and its carbon emissions are growing.
- Prioritise highly productive land and also potentially productive land.
- We need intensification and options for smaller houses and properties.
- We need infrastructure that will last well into the next century.

Carsten Buschkuhle - Tasman Bay Estates (31524)

Mr Buschkuhle spoke about his proposed development in Tasman.

- He acknowledged the community's concerns about the development.
- Our plans are the start of a vision for a model village. Mr Buschkuhle and his team have presented to Tasman District Council and have commenced consultation with iwi.
- Mr Buschkuhle wants the opportunity to show the Tasman community his vision for a model village.
- The proposed development will offer core services to the Tasman community. Residents won't have to travel to Motueka or Māpua to get their provisions.

In response to questions, Mr Buschkuhle said he envisages that houses will be built on his proposed development site in 4-5 years. He confirmed that he had started consultation with iwi and mana whenua noting that a recent leadership change within Te Atiawa has stalled discussions.

He also confirmed that the proposed development will include a commercial/market centre in the middle of the settlement so people don't have to travel to get what they need.

Ian McComb - Small Time Developments (31549)

Mr McComb introduced himself as a civil/environmental engineer who has worked in local government. He noted that:

- He supports infill intensification but it appears it won't happen quickly. Needs to be facilitated earlier. Development is hampered by timing issues, planners need speed and certainty in the consent process.
- Councils' building consent teams need to process consents quickly. Need to start now, gear up the teams to be able to handle more infill housing.
- Councils' should provide a facilitator to help developers get on with the job.
- Ensure issues such as secondary flowpath mapping and traffic impact assessments are covered and then get the developers to pay for that work. They help councils make decisions without developers having to go into the detail for each development.
- The real costs to developers are the delays in getting consent.
- RMA constraints should be dealt with.
- Plug for collective housing and co-housing, papakainga concepts.
- *The meeting adjourned at 2.37 pm and resumed at 2.50 pm.*

Raine Oaklands Estate (31547)

Jane Hilson spoke to the submission.

- Intensification needs to be supported by greenfield development – need variability in the region.
- Question why the level of demand for the Saxton area (Oaklands Flats) is considered low in the FDS.
- The Raine family are also considering a business park which would include the current Oaklands Milk outlet.
- Ms Hilson provided a brief history of the Raine Farms and the Raine homestead which has been lived in since 1844. Oaklands Farm is the oldest in New Zealand. The historical value

of the site is very important to the Raine family. There are some highly protected trees and some parts of the land that the Raine family does not want to see subdivided.

- The Raine family want to ensure that the remaining 300 hectares of farmland is enhanced with more plantings which leaves an enduring intergenerational asset.
- Ms Hilson presented a concept plan for the proposed business park.

In response to a question, Ms Hilson suggested that the Raine land could sustain a multiple of housing stock options.

Kainga Ora - Homes and Communities - Jennifer Rose (31807)

Ms Rose outlined the two key roles of Kainga Ora as a public housing landlord and also as a leader and coordinator of urban development projects.

- Nelson-Tasman is a priority area for Kainga Ora to grow housing stocks.
- There is an increased demand for public housing.
- Ms Rose suggested that the wastewater capacity at Bell Island needs further upgrades but not sure if that can happen to coincide with FDS planning.
- Kainga Ora does not support the proposed development at Tasman because of significant cultural concerns, also the proposal does not represent compact form. Doesn't create sustainable communities, more reliance on cars and therefore greenhouse gases.
- Greenhouse gases – FDS proposal has a key role to play in greenhouse gas emissions.. Need to minimise people's use of cars. Kainga Ora supports the consolidation of growth along existing transport corridors.
- The FDS needs to include the capacity for schools within FDS growth areas.
- Kainga Ora generally supports the options of residential intensification and consolidation along growth and transport corridors – it was suggested that the Nayland South boundary could be expanded to include Seaview Road for intensification.
- Consolidation is preferred but Kainga Ora recognises that greenfield development may also be required to meet demand.
- Development constraints – supports development away from natural hazard areas, eg sea level rise. The FDS does not explain or address what the impacts of sea level risk may be on future housing.
- Highly productive land is another constraint that limits development in the region. Kainga Ora supports the retention of this land for productivity, not housing.
- Implementation strategy – no details when growth areas will be rolled out over next 30 years. Would be useful to have an indication of the proposed staging for growth areas.
- The FDS proposal should have a clearer and stronger focus on meeting the affordability issues.

Philip Osborne from Kainga Ora commented on the FDS from an economic perspective. He noted the imbalance in Tasman between brownfield and greenfield development. He said that history showed that housing demand should be focused on where people want to live. He also noted the issue of housing affordability in greenfield areas.

Kainga Ora staff agreed they were open to further discussions with Council staff.

Dr Patrick Conway (31651)

Mr Conway spoke about his concerns including:

- The FDS designates the Tahunanui slump area for residential infill development – there is a well documented history of land instability in that area.
- If infill housing was to go ahead, the Council would need to mitigate the land instability. There is also an issue of springs coming up on land in this area.
- His second main concern is about traffic impacts on Rocks Road especially more commercial traffic – as it will see a lot more gridlock and become dangerous. Supports an inland route.
- Also sea level rise and rock fall from the hills will impact Rocks Road. The FDS should consider reducing the traffic on Rocks Road.

Mr Paul Davey (31612)

Mr Davey is concerned about the intensification and proposed high rise buildings planned for Tahunanui and the lack of notice given to residents in the area about these plans.

- Who will benefit?
- He referred to sea level rise and earthquakes as major restraints against any such development.

Lucy Charlesworth (31623)

Ms Charlesworth feels very strongly about the Maitai River being protected.

- She is concerned about the FDS development proposal as it will negatively impact the Maitai River.
- She referred to a quote from Councillor McGurk referring to the Maitai River as a “river for everybody, a river for New Zealand, and a strong sense of guardianship”.
- Any development in the Maitai Valley will cause an irreversible environmental tragedy that future generations will not thank the councils for.

Mr Daniel Levy (31628)

Mr Levy noted that he is totally opposed to any development in the Maitai Valley.

- He sees the importance of high level planning but he thinks it was very clear from watching the FDS webinar that river health and the recreational amenity values of the Maitai River hadn't been considered as part of the proposed development in the Maitai Valley.
- Mr Levy spoke about his own experience of growing up in Hong Kong. He suggested that planning that is done well does work. Country parks were included in the development of Hong Kong; they were seen as vital to the wellbeing of the residents. The Maitai Valley is our country park and therefore vital to the wellbeing of Nelson residents. We must retain it.
- Agrees we have a housing crisis but we also have a declared climate emergency. Emergency trumps the crisis. Need to put that in front of mind in your planning.
- Does not support any significant greenfield developments in Nelson.
- Must stop building on flood plains. Experts agree with this.

- Fully supports intensification on the city fringes and the CBD, especially with affordable housing – this solution provides so much potential.

Joy Shackleton (31631)

- Joy noted that she agrees with what Daniel Levy said.
- Joy's submission is specific to Tahunanui. She does not agree with the councils considering six-storey buildings.
- Referred to liquefaction and sea level rise issues which are known to residents.
- How can you be aware of those issues but still consider high rise buildings in Tahunanui.
- Also concerned that after infill housing in the 1980s, six storey buildings will mean current housing will lose the sun which will impact on residents mental health.
- Tahunanui Structure Plan not taken up by the Council.
- We are a seaside village, we are important to the tourist industry.

The meeting adjourned at 4.40 pm.

Thursday 28 April 2022

Present: Nelson City Council – Mayor R Reese, Deputy Mayor J Edgar and Councillor B McGurk

Tasman District Council – Deputy Mayor S Bryant, Councillor K Maling and Councillor D Ogilvie

Iwi representative – Ina Kumeroa Kara-France

In Attendance: Tasman District Council – Group Manager – Service and Strategy (S Edwards), Environmental Policy Manager (B Johnson), Urban Growth Coordinator (J Deans), Policy Planner (M Bengosi Project Manager – Environmental Policy (A McKenzie), Executive Assistant – Service and Strategy (T Fifield), Executive Support Officer (G Drummond), Infrastructure Planning Advisor (D Bryant), Senior Infrastructure Planning Advisor (K Arnold), Strategic Policy Manager (D Fletcher), Graduate Community Policy Advisor (N Lindsay), Infrastructure Planning Advisor (H Lane) and Councillor Hill

Nelson City Council - Strategy and Environment Senior Analyst (C Pawson), Group Manager Environmental Management (C Barton), Councillor Noonan and Councillor Sanson

Chairperson, Mayor Reese welcomed everyone to the meeting and opened proceedings with a karakia.

In response to a question, Ms Edwards said that the only avenue to challenge the decision by the Joint Committee is through a judicial review. The appeal would go to the High Court.

In response to a question about what the Joint Committee's grounds are to change decisions made as recommendations to them from the Subcommittee, Ms Edwards' view is that the Joint Councils could refer the matter back to the Subcommittee for reconsideration based on specific matters of concern or they could ask the Panel members on the Joint Committee why the decision was made and make a final decision.

It was agreed that once the hearings process is completed, staff are to schedule a pre-deliberations report session.

It was noted that Ms Kara-France no longer requires the Cultural Impact Assessment and information relevant to the Tasman Village proposal.

Ms Joni Tomsett (31569)

Ms Tomsett is a member of the Motueka Community Board but submitted on behalf of herself:

- IPCC report in regard to urban development – many development plans focus on risk reduction and urban expansion is compromising green infrastructure and ecosystem services;
 - FDS should focus more on protecting the environment;
 - supports intensifications specifically medium to high density in areas that are linked with active and public transport networks;
 - believes there is scope to be able to provide alternative housing solutions;
-

- doesn't support any development that is vulnerable to natural hazards.

In response to a question about a structure plan for the development of Motueka South, Ms Tomsett believes there should be ways to make it easier for iwi to develop housing for their people.

Mr Doug Hattersley (31405)

Mr Hattersley spoke about:

- the reduction of productive land and objects to only "highly productive land" being the cut off for land that won't be used for greenfield development but anything less than highly productive land could be developed for residential purposes;
- he referred to Selwyn District Council where commissioners rejected an application for rezoning near Rolleston because of the new government law for intensifying development, reducing emissions, easing pressure on productive land and where the development was against the principles of the RMA;
- in the potential new area, there are four fractured blocks of land that are semi joined or not joined at all and utilities will have to come from Motueka to service them;
- once the FDS goes through, it will be easier for the developers to get approval for a plan change;
- he supports the FDS for intensification but to include this potential area is inflaming the situation and ruining the FDS because everyone is concentrating on greenfield development of potential new areas in Rural 3 land.

In response to a question asking whether the current resource consent is valid or expired, Mr Hattersley's neighbour was told it is on hold but it hasn't been cancelled outright. Staff will clarify the status of the consents.

Mr Jon Taylor (31420)

Mr Taylor is a member of Tasman Area Community Association and is against the development at Tasman Village:

- he believes the process has been rushed;
- because it has gone into the FDS it has given more weight to the development;
- the submission period should have been longer as the Tasman Area Community Association only meet monthly;
- there will need to be new infrastructure put into the new development.

Staff noted the consultation period was 32 days.

In response to a question, to Mr Taylor's knowledge, the Tasman Area Community Association hasn't had engagement with the developer.

Mr Alan Eggers (31435) (with Mark Morris (Planner))

Mr Eggers spoke about a proposed multi titled development at Spring Grove which would have four titles, is in close proximity to the Domain and zoned Rural 1.

Mark Morris, a Senior Planner for Davis Ogilvie spoke about:

- some of the challenges of providing growth for Brightwater over the next 30 years particularly as it is susceptible to flooding, because of the productive soils and because of fragmentation of some of the areas that are rezoned for some of the development;

- a lot of the infrastructure is already developed;
- could have quite a large development within the site he is proposing at Spring Grove and there are 10 km of cycleway and walkways that could enhance the development.

In response to a question, the size of the lots are 2,500 m² but these could be amended.

In response to a question, Brightwater school is approximately 4 km from the proposed development.

Mr Matt Olaman (31461)

Mr Olaman said:

- there has already been widespread development in Pigeon Valley North and along Sharps Road;
- the proposed area for development could be extended with no negative impact to the area;
- commercial forestry doesn't start on his side of the road so development could continue as far as the sealed road goes;
- the sites would be highly desirable;
- if it was rezoned as proposed, it would be easier for him to subdivide and his children could have a block of land each.

In response to questions he advised:

- his property is 4.33 km from Wakefield township;
- he has never had an issue with water at his property even in dry summers;
- he doesn't believe there would need to be any roading upgrade due to increased traffic;
- Mr Olaman is thinking 1 ha sections for his children.

A morning tea adjournment was taken from 10.13 am to 10.47 am

Ms Jane Murray (31512) Nelson Marlborough Health

Ms Murray spoke on behalf of Nelson Marlborough Health:

- strongly support the proposed outcomes especially in regard to the urban form that reduces greenhouse emissions by integrating land use and transport;
- supports outcome 9 that Nelson Tasman is resilient to the risk of natural hazards. Note that Tasman has not had its assessment done on flooding etc and would like to see these assessments done;
- supports the outcome concerning the protection of highly productive land;
- would like to see inclusionary zoning included in any greenfield development;
- housing stock is important to the ageing population and there would be benefit in an increase in smaller, easy care properties close to amenities;
- support the primary proposal in regards to development along SH 6;
- encourage intensification rather than greenfield development and supports the 15-20 minute city approach.

In response to question, Ms Murray said sun and light into living rooms and outdoor living areas is essential. She noted the ability to step up the height of developments further away from boundaries to protect sun on neighbouring properties.

Cynthia McConville (31513) Golden Bay Branch Forest & Bird

Ms McConville spoke on behalf of Golden Bay Branch Forest & Bird and said she was responsible for the Golden Bay shorebirds protection campaign:

- the Branch objects to the proposal in the FDS to rezone land at 42 Keoghan Road (site T-163) to rural residential;
- the terraced area is surrounded by wetlands, rivers and streams supporting freshwater fish and native birds;
- they ask that the property be removed from the FDS – it's high biodiversity values make it unsuitable for housing development.

Mr Richard Clement (31530)

Mr Clement opposes the new town proposed at Tasman Village:

- a new town in an undeveloped area means no adverse impact on people because all residents will choose to live there, however, a secondary proposal would alter an existing community;
- residents in the area live there because they want to live in a rural environment;
- concerned with the Harakeke consent and loss of productive land, landscape transformation, re-zoning costs, potential flooding, and potential climate change impact;
- create a new town on bare land in Brightwater or Wakefield;
- instead of spending money on infrastructure for Tasman Village, use it to create intensified sustainable living and job creation initiatives in the SH 6 corridor.

Ms Charlotte Watkins (31586)

Ms Watkins said:

- the FDS doesn't address climate change and decarbonisation that we require for our region;
- would like to see what the FTE climate change positions of Nelson City and Tasman District councils are;
- public transport needs to be improved and would like a supermarket in Tahunanui;
- concerned at putting houses next to Snowdens Bush Scenic Reserve (T-102 site), and potential for household cats to kill native birds etc and that changes to stormwater will affect the hydrology of the site.

In response to a question about how we achieve the holistic approach to wellbeing, she believes that green spaces, the ability for people to grow food in their own gardens and people are warm in their homes is important.

Rebecca Hamid (31539) River Road Company Ltd

Ms Hamid spoke about:

- her concern that the FDS is focussed on economic development;

- Maori and iwi have a holistic view of life, both present and future, in which economics is only a small part;
- the plan is ad hoc to meet demand rather than being visionary about what we could achieve ie mixed land use development along Queen Street;
- concern about development of multiple villages with increasing traffic and how that has impacted on people's lives in the last 10 years;
- believes the plan has data which is faulty or not informative due to Covid;
- encourages the Panel to reconsider the draft strategy and make it forward looking with a vision and to consider all the elements which make our lives enjoyable.

In response to a question about balancing the need for housing against the desire to keep things as they are, Ms Hamid said leadership comes into that and taking measured steps.

Ms Melanie Drewery (31542)

Ms Drewery spoke about:

- the Tasman Village development needs to be planned very carefully;
- concerned there is no allowance for Māpua village to keep some of its character if they go ahead with so much development in the hills and she doesn't want to be landlocked;
- wants to be able to farm her place as a lifestyle block or, if that's not possible, it needs to be rezoned – it can't be Rural 1;
- understands there are iwi concern but she has looked at archaeological records and nothing has been found on her property;
- allowing businesses to pop up over Māpua will put too much on the village – the roads are narrow and parking is becoming more of an issue; and
- need to allow for a wetland corridor.

In response to a question, Ms Drewery doesn't believe there is enough commercial land in Māpua to support the population.

Tim Bayley (31723)

Mr Bayley said:

- the proposed number of dwellings in the FDS seems to be excessive;
- he screenshared maps (page 35 of the FDS) and considered that they were confusing and didn't believe they were correct (areas N-019 being a red zone and N-020 being a pink zone). He said N-019 has some of the best established trees and historic houses in Nelson and residents of Nile Street and Harper Street will not be pleased to lose their sun with six storeyed houses;
- error in the green area around the cathedral – only going down to Nile Street but it extends down to Selwyn Street and at a high density;
- errors in the number of dwellings in the area N-019 – staff are using the gross land area for the footprints;
- he believes the public needs to know which sites have been singled out for possible intensification;

- his property at 52 Domett Street would be included in the 189 available lots and he doesn't believe it should be used for infill;
- agrees with housing in the Nelson CBD above existing retail and doing a block of green apartments in Buxton Square, supports 5 or 6 storeyed houses to be built in the bottom of the hills, supports people to do small infills by adding tiny houses/granny flats on their properties without requiring subdivision.

Dominic Williams (31448)

Mr Williams is interested to know what the rating situation would be for their property. It was noted that the FDS does not rezone or subdivision land. Rezoning would need to happen through a subsequent plan change process and their land value is unlikely to change until any rezoning happens.

In response to a question, Mr Williams' preference is for his property to remain rural.

Mr Williams believes the consultation should have been longer.

Ms Sandy Armstrong (31730)

Ms Armstrong said the area around her property in Murchison is proposed to be rezoned from rural to residential and they moved there because it was rural and had beautiful surroundings.

She believes the community consultation hasn't been good.

It was noted that there will be a formal plan change out for consultation later in the year.

Ms Armstrong said the FDS lacks vision and to think of the environment and people's wellbeing.

A lunch adjournment was taken from 12.27 pm to 1.18 pm

Mr Martin Hudson (31134)

Mr Hudson a retired GP living in Motueka said:

- the FDS needs to look at the long term needs of the Nelson Tasman region;
- the housing crisis is hard particularly for young families;
- he strongly opposes the proposed development near Tasman Village because of the loss of agricultural land, building concrete produces a lot of CO2 which would affect climate change, the rising population will affect the pressure on water resources and there is no public transport;
- new residents would be isolated and would need to use their cars as there are few employment opportunities close by;
- it would be expensive to provide infrastructure to this development.

In response to a question, Mr Hudson said the infrastructure isn't coping with the increased number of residents and the roads are very difficult.

Mr Jack Bauer

Mr Bauer explained the importance of the school for the St Arnaud community. He spoke about development in section T-181 through to Top House Road. He believes there needs to be more families in the area and if the lot sizes are 5000 m², it makes it more likely those properties will go to residents who will help support the school.

In response to a question, the houses are well away from the wetland.

In response to a question, T-181 is 5 km from the St Arnaud township.

Dr Lou Gallagher (31559) Māpua and Districts Community Association and Wildlife Corridors Subcommittee

Dr Gallagher formed the Wildlife Corridors Subcommittee in 2021. She spoke about:

- saltwater intrusion and flood control in areas around Māpua;
- sea level rise in Māpua and she presented a map of the Māpua Estuary;
- the group did a community survey and the natural environment is valued more highly than any other aspect of living in the Māpua /Tasman area;
- over 60% of residents are concerned about over development in this area.

In response to question, Dr Gallagher said the community would prefer higher density housing in already established areas.

Mrs Jean Gorman (31263)

Mrs Gorman said:

- there is too much growth in the region and FDS doesn't provide evidence about why we need growth;
- she doesn't agree that the plan reduces travel;
- need an integrated transport plan - a bus service to the airport would be good;
- the proposed maps show intensification in central Nelson in known areas of flooding;
- satellite towns with commuters is an outdated model;
- there is no large employment source in Wakefield and Wakefield is a long commute to town, the soils are great for horticulture and it needs new infrastructure.

Mr Matt Taylor (31271)

Mr Taylor said productive land is the issue and he would like to see that protected as much as possible.

In response to a question, he noted that the Council and irrigators have invested in the Waimea Community Dam so it makes sense to protect the alluvial soils around the Waimea Plains area.

Cr Edgar left the meeting at 2.07 pm

Mr Richard Osmaston (31293) Money Free Party NZ

Mr Osmaston spoke about:

- meeting the Strategy's outcomes and considers we don't come close to meeting them;
- his concern about the environmental impacts of development and considers the councils shouldn't be providing for growth;
- how will it reflect our climate responsibilities;
- we are not addressing the cost of living, unemployment and stress for people; and
- we need to look at a different economic system.

Cr Edgar returned to the meeting at 2.13 pm

Rob Ford speaking on behalf John and Karen Heslop (31316)

Mr Ford spoke on behalf of the Heslops in area T-114 (Eyles Road, Richmond):

- this area is highlighted as a potential high growth area, however, it is not viewed as a high priority in the FDS document;
- the area has potential for high rise development on the lower level;
- infrastructure will need to be provided to enable development of the land - 3 Waters may bring this timeline forward with the integration of both councils' infrastructure;
- the property has great green space development, good amenities and is central to Richmond.

In response to a questions, Mr Ford noted:

- if the capacity was higher, there would be higher density and more affordable housing in this development;
- a cost effective way to build is multi-unit developments;
- this land is zoned as deferred rural residential;
- it would take 10-20 years to develop the land with the current demand.

Dr Ann Briggs (31325)

Dr Briggs raised her concerns:

- about the design of the questionnaire and that the outcomes in the Strategy are actually aims but she's not sure the plan sets out how the aims will be achieved;
- outcome 11 on the questionnaire looks as if it is an afterthought as the existing natural environment is being used for development and doesn't appear to be protected, as only productive land is singled out as protected;
- outcome 8 regards climate change – only appears to deal with adaptation rather than mitigating emissions;
- the priority seems to be to release land for development with no control by the Council over the environmental impact of the development process and greenhouse gas emissions;
- outcome 7 – she suggests looking at the existing environment before development is thought of, conserve mature trees, make the developers demonstrate how they will retain the substantial vegetation;
- the FDS classifies wetlands and coastal margins as unproductive land is wetland when they should be identified as conservation land.

Steve Anderson (31343)

Mr Anderson said:

- he lives rurally in Ngātimoti and he would like to encourage the panel to allow easier subdivision on rural land. Motueka Valley Highway could provide a lot of housing opportunities for this demand;
- he doesn't see that intensive greenfield developments suited everybody and that larger pieces of land would help provide for some of the demand;
- there is a strong sense of community in Ngatimoti and in terms of housing, intensive housing does not have the same sense of community as rural areas;

In response to a question, Mr Anderson said there are a lot of people who work from home so that helps with the climate crisis and reducing travel.

In response to a question, there are a lot of properties like his that could be easily subdivided - it would enrich the community to have more families in the area.

Steve Richards (31386) Tasman Area Community Association

Mr Richards said the Association doesn't believe it is necessary for the secondary proposal to be included in the FDS. Some concerns are due to greenhouse gas emissions, stormwater, sewerage, community value and building a dormitory suburb.

In response to a question, it would be the Association's preference to intensify Nelson, Richmond, Brightwater and Wakefield rather than Motueka or Tasman.

Afternoon tea adjournment was taken from 2.25 pm to 3.17 pm

Mayor Reese vacated the chair at 3.17 pm and Deputy Mayor Bryant took the chair.

Timo Neubauer (31566), Jan Heijs (31494), William Samuels (31593), Magdalena Garbarczyk (31564) - Nelson Tasman 2050 (31540)

The Nelson Tasman 2050 group presented a Powerpoint:

- the group is advocating for better urban design and planning for Nelson Tasman;
- they consider that the Strategy won't deliver on the outcomes (which are aims not outcomes) in it;
- key areas of concern include procedural issues, legal, economic rationale; lack of overall vision for Nelson Tasman;
- their report has been peer-reviewed;
- Dr Andy Reisinger gave his views and outlined the urgent need to reduce greenhouse gas emissions and the IPCC's latest summary for policymakers;
- if greenhouse gas reduction is the goal, then intensification is a must and there are concerns this is not achievable via the current proposal;
- the proposed FDS shows that basic property economic principles for achieving intensification are not understood – releasing large amounts of greenfield land, lowers land values;
- flawed methodology for growth predictions – the strategy should decide where it is best to grow not base it on historic trends;
- disproportional growth projected for Māpua, whereas Motueka isn't growing much;
- multi criteria analysis not fit for purpose (flawed methodology of site selection);
- they consider there has been an insufficient consultation process and that it has not been an unbiased process;
- an over-reliance on greenfield development prevents intensification, creates loss of productive land, and a lack of diverse housing options;
- lack of quality urban intensification proposed: bad examples of intensifications may build popular opposition to higher density living;
- quality intensification: community, density, diversity, accessibility, sustainability and affordability;

- the 2019 Nelson City and Tasman District Council intensification action plans were insufficient and didn't promote intensification;
- encourage more active council processes – establishment of a Nelson Tasman Urban Development Agency;
- recommend that the FDS be reconsidered to ensure a better future for the Nelson Tasman region.

Mr Williams said this is a 30 year strategy and public attitudes change quickly – we need to build up, not out. The Council could take the lead and show good examples.

In response to a question about limiting greenfields in existing town areas and how we manage that when we can't legally block landowners from progressing private plan changes, Mr Neubauer said that other councils are doing it so there must be a way.

In response to a question, there is a need to build smaller houses - we can dramatically reduce carbon and also use lower carbon materials.

Geoffrey (Jim) Vause (31515) - speaking with Annette LeCren (31148)

Mr Vause presented a Powerpoint:

- their submission is relevant for both the FDS and also the Mapua Growth Plan Change;
- concerned with the Rates Remission Policy;
- recommend Council change its terminology such that land used for primary industry is classed as greenfield;
- recommend the FDS and MGP provides for ratepayer and independent informed expert review of urban design;
- recommend in order to meet its outcomes 1, 7, 10, 11 in the FDS, the councils must provide in the FDS a methodology and timeline based on need criteria that will prioritise infill intensification above greenfield;
- recommend the FDS is revised to allow adaptability in actions based on a better understanding of the factors that influence housing demand over time.

Mr Jeff Santa Barbara (31457)

Mr Santa Barbara echoed Nelson Tasman 2050's submission and spoke about:

- as the co-owner and director of Trinity Hills, there is a demand for lower carbon housebuilds and smaller sections sizes in the rural environment;
- flagged T-17 (3 km south west of Motueka) is an excellent site for greenfield as it is not well suited for production.

Mr Santa Barbara clarified that a carrying capacity study refers to the natural resource capacity of a given piece of land.

In response to a question, even though T-17 is zoned rural 2, it would be better zoned as rural residential. He said it is reasonably close to schools and key employment centres.

Mr Steve Malcom (31674) (with Mark Morris, Planner)

Mayor Reese left the meeting at 4.34 pm

Mr Morris talked about:

- an area of land in Lower Moutere (Braeburn block) which is a contained basin and would be a great area for a new settlement;
- challenges of providing for growth in Motueka (coastal inundation, flooding hazard from Motueka River, highly productive land, heritage sites);
- advantages of the Braeburn site is its a blank slate site with very few existing residents making it easier to have a more planned development, close to proposed sewer water infrastructure with potential for transitional servicing, adjacent to major infrastructure routes, and in close proximity to schools;
- issue is the short term ability to put titles on the market;
- should be looking at rural residential blocks with a new set of rules in the Tasman area;
- the existing numbers for growth is short by at least 50% and Council should be doubling the area.

Mr Hamish Rush (31419) Aporo Orchards Ltd

Mr Rush spoke about:

- future growth is a huge challenge for the District;
- is concerned with the secondary proposal which neighbours his property and he doesn't support it;
- he supports the growth in logical areas ie Brightwater, Wakefield;

Cr Maling left the meeting at 4.48 pm

- already have a rural 3 zone which was set in 2004/2005 and thinks it is the appropriate zoning for some residential growth and should remain so for the foreseeable future.

Mrs Miriam Lynch (31117)

Mr Mike Lynch spoke on behalf of his wife and himself:

- his family moved from Christchurch and now reside in Braeburn Road, Lower Moutere and they love their rural lifestyle in Tasman;
- opposes T-136 which does not meet outcome 10 – that highly productive land is protected;
- a housing development on T-136 needs infrastructure which will be at a high cost resulting in expensive housing – there is no water supply or sewerage treatment, it is a catchment area which adds to the flooding of the Moutere River;
- T-136 doesn't meet Outcome 1 of the FDS - the support of reducing greenhouse emissions;
- the secondary proposal for site T-136 should be removed from the FDS and the Malcolm Consortium submission should not be considered.

Deputy Mayor Bryant thanked all submitters that were online today.

Deputy Mayor Edgar closed the meeting with a karakia

The meeting was adjourned at 4.59 pm

Friday 29 April 2022

Present: Nelson City Council – Mayor R Reese (via Zoom), Deputy Mayor J Edgar and Councillor B McGurk

Tasman District Council – Deputy Mayor S Bryant, Councillor K Maling and Councillor D Ogilvie

Iwi representative – Ina Kumeroa Kara-France

In Attendance: Tasman District Council – Group Manager Service and Strategy (S Edwards), Environmental Policy Manager (B Johnson), Urban Growth Coordinator (J Deans), Policy Planner (M Bengosi), Environmental Policy Administrator (N Armstrong) and Executive Support Officer (G Drummond)

Nelson City Council – Project Manager – Environmental Management (N Ching)

Apologies: Mayor Reese noted her apology from 2:45pm.

Chair Deputy Mayor Bryant welcomed all to the meeting.

Councillor McGurk offered the opening karakia.

Olivia Neubauer (31605)

- Supports Nelson Tasman 2050 submission.
- Linkages between the FDS, its outcomes and actions to be considered and how its measured.
- Challenges both Councils to lead with climate mitigation measures.
- Outcome one needs to be broader. Look at how intensification will support the reduction of greenhouse gases.
- Need to have apartment and townhouse options in existing urban areas.

In response to questions, Ms Neubauer said central Nelson will need more green spaces to support people into intensified living. Need a designed concept where people want to live, not a concrete wonderland.

Sarah Whittle (31407)

- Consider terrace housing options, like the United Kingdom.
- Compact living spaces to be walking and e-biking distances to amenities.
- Compact living not to be restricted to retirement villages.
- Greenfield developments are not suitable for all sectors of the population.
- Richmond CBD to be included into the intensification area and developed first.
- Be flexible about how we use car parking spaces.
- Urban design, to meet needs not what developers want.
- Have green spaces in town.

- Establish incentives for developers to build in town.
- Make the ugly spaces beautiful before turning the beautiful spaces ugly.

Mark Lile for CCKV and Bayview Nelson (31776)

Mark's the lead consultant for the private plan change request for CCKV and Bayview Nelson's land. A joint plan change involving 287 hectares of land. He noted:

- Issue of intensification vs greenfield in his submission is supported by the NPS UD. Not everyone wants to live in an apartment or can afford one.
- Intensification uptake is likely to be relatively slow and influenced by price, impacting intensification goals.
- People would love the opportunity to have a section to build their own house, not necessarily a townhouse or an apartment.
- Working with Ngāti Koata to provide a range of housing typology.

Deputy Mayor Edgar asked if an extension request was made as Mark's submission summary page said it was. Mark confirmed he wasn't requesting an extension. Deputy Mayor Edgar asked for this to be corrected in the official record, and Deputy Mayor Bryant asked Mark to check this and come back.

Mayor Reese said we've had submissions on our integrity of our economic analysis. She asked Mark, given his knowledge of the region, if he's interested in checking the evidential basis. It's not directly related to his submission but wanted to raise it with him in the hearing for transparency reasons. Mark said he is happy to help.

Mark Lile for Wakefield Developments (31750)

Mark Lile presented on behalf of Wakefield Developments.

- Wakefield Developments are developing land in Wakefield Village.
- Another piece of adjoining land for approximately 180 different lots.
- Looking to provide for a range of housing typologies, have addressed flooding risks, conducted a Cultural Impact Assessment and are working with Iwi.
- An opportunity to provide a community recreational area, which joins the cycleway and is amongst totara trees and a significant oak tree.
- Working with the Council reserves team to retain mature trees.

Climate change mitigation and adaptation was asked to be added to the subdivision consideration list. Mr Lile said the site is close to the centre and doesn't fully rely on vehicles. Storm water will be managed in an integrated way. Sea level rise is not an immediate threat to this area.

To answer a question on land productivity Mr Lile said it's been a grazing block and sheep farm for a long time. Working through a HAIL issue from that time. Not horticultural land, doesn't have the same horticultural values as the Waimea Plains.

Eleanor Greenhough (31767)

- Opposed to the loss of productive farmland for greenfield development, will lead to expensive food.
- Growth should be within existing areas, with existing infrastructure.

- Objects to T-136 and the proposal for the land at Braeburn road. Far from services, multimillion-dollar views so unaffordable housing. Will not meet FDS outcomes.
- Wetlands on her property are in the top 10% in the region. How can T-136 be developed without destroying the wetlands on her property?
- Has farmed on Moutere clay all her life, which is highly productive land. Her farm is a similar land to that of T-136.
- Problems when urban and rural areas intermingle.
- The lease of T-136 is Alliance Group's third biggest supplier of lambs in NZ.
- Tasman's Great Taste Trail goes along the edge of T-136, if this land is built on it will spoil the views. People bike the trail is to get away from urban areas.
- She asked the Council to scrap T-136 proposal and further proposal in the FDS.
- She believes there's cultural significance to the whole Moutere area. It's not just about the battlefield here.

Dr Bruno Lemke (31625)

- Parks and reserves in Ruby Bay, Mapua are too small. = Less than 2% public green space, doesn't compare to other cities.
- Rules state 5% needs to be set aside for public green space, resulting in a scattered approach that isn't conducive to nature. Wildlife doesn't do too well in a block surrounded by houses, as there are no corridors to move to.
- The 5% is focused on human activity for possibly five families per hectare. That 5% needs to increase with intensification and population rise.
- Developers purchase land, keep it as a farm for a few years to move the soil around (as you don't need a consent to do that). Then they put it up for a subdivision, which happened to the subdivision above Aranui park. Land purchased by a developer should be treated as a development not a farm.
- There's a recent subdivision along Seaton Valley Road, mean high-water mark shows a lot of the land is a wetland.

Steve Hayden (31641)

Mr Hayden's property borders the proposed expansion at T-136 in Braeburn Road. Concerned about the following:

- An increase in traffic on Taman View Road, which is a non-maintained road.
- Effects on the cycle trail if Tasman View Road becomes a major service road.
- Any new subdivision should include sustainable homes, cycleways, horse-riding areas.

In response to a question, Mr Hayden confirmed he can see both sides of the development argument. If he must choose, he will choose not to support the development.

John-Paul Pochin (31701)

- The benefits to terrace housing as available in the United Kingdom.
- Latest IPPC report is clear that we have environment issues and are not doing enough to address them.
- We cannot continue to expand, as we're stealing from future generations.

- He's worried how cities have been developed; areas that are not connected to the community and leaving a concrete building environmental to our children.
- We need good practices that encourages good social and environmental outcomes.
- We're focusing on car travel and commuting that way.
- The idea of competing towns is unhelpful, even between Nelson and Richmond our cities need to work together

Answering a question on the new public transport strategy coming out in 2023, Mr Pochin said it will help, yet we're playing catch up. We're still doing what we've always done, developing greenfields. Need to make radical changes, adding a few extra buses won't make things that different.

Tom Kennedy from Friends of the Maitai (31632)

- Main concern is maintaining river water quality, recreation opportunities, and biodiversity to be fostered.
- The 2017 aquatic sites of significance report identifies what's required to protect species in the river.
- FDS needs to consider amenities and historic value of the river.
- The need for huge infrastructure is a concern. Existing infrastructure in Milton and Neil streets already have a raw sewage problem in heavy rain. A further 1100 houses will require major infrastructure works.
- Support the intensification in the existing urban areas and improvement on existing infrastructure.
- With large, urbanised areas in the Maitai, it will be difficult to ensure that the river will remain healthy.
- Ask the Council to adopt the same long-term vision as the early city planners who set aside green spaces and strategically limit future development in the Maitai Valley.

To answer a question on his views for intensification planned for Milton and Neil Streets, Mr Kennedy said it will probably impact where he lives. Yet he sees it as the best way forward in terms of protecting existing amenities and greenspaces. Intensification can be done well and can be people friendly.

Jacquetta Bell (31633)

Ms Bell spoke with her granddaughter as her concerns are for the future generations.

- Developments with car commuting only options, won't make it a better place for our grandchildren to live.
- The FDS doesn't protect productive farmland, nor reduces carbon emissions or emissions from construction.
- The intensification uptake will be slow if the only option is buildings designed by developers motivated by profit. Suggested the Council look at affordable inner-city apartments to foster the sense of community and shared spaces.
- The petition to keep the Maitai rural has over 13,000 signatures.

- The FDS doesn't acknowledge the recreation value of the area or the river or protects the valued swimming holes.
- Development of housing in the Maitai Valley will result in a further decline in water quality.
- As we intensify in the city it is vital that we retain access to nature.
- Suggested establishing a working group to speed up the intensification process with imaginative green buildings. Saying she would eagerly move into a shared space for older people to free her three-bedroom home for a family

Brenda Wraight (31654)

- Opposed to intensification for Tahunanui, specifically five to six storey buildings on land currently housing a mixed community with diverse needs and prone to liquefaction. This is at odds to the Government's policy on housing statement for urban development.
- FDS does not address long term traffic and parking issues associated with more multi storey buildings.
- FDS doesn't reference the Ministry of Transport accessible streets strategy.
- She objects to the displacement of the residence, knowing they won't go into an apartment costing upwards of \$800k.
- This is a social inequitable proposal for Tahunanui and does not respect the housing needs of people who live here, including those who need affordable housing.
- Urges Council to adopt a moratorium on height preventing building above three stories.
- The FDS consultation document does not specifically mention Tahunanui, however several other documents do, and none are aligned.

In response to a question, Ms Wraight confirmed she had briefly seen the public transport plan for Nelson Tasman.

The hearing adjourned at 3:10pm and resumed at 3:27pm

Peter Taylor (31670)

- Supports inner city intensification, not greenfield developments.
- Increasing material and transportation costs for greenfield development, is not compatible with climate change.
- Extend incentives for people who own land in areas where buildings can go.
- Request for Kaka valley to be removed from the FDS.
- By keeping the Maitai underdeveloped with an intensification model, you'll be able to supply green space for those who choose to live in intensified areas.
- Greenspace development increases debt and traffic levels for future generations.

Deputy Mayor Edgar asked how you make intensified dwelling affordable, without them being social, it's not just about social housing or public housing. Peter said infrastructure costs for greenfield developments fall on the rate payers, the Maitai infrastructure required will be a burden. It's about where the Council can be effective. By maximising what's already there, minimises costs, combined with developer incentives for building more units it then becomes effective. Inner-city development regulations, make it difficult to convert commercial land to residential.

Deputy Mayor Edgar asked about affordability in terms of people getting into housing. Peter said the way forward is collaboration between different groups. The news recently reported that there is a collaboration project between agencies starting to work in this space.

Heather Wallace – Friends of Golden Bay (31669)

- Rural residential sites proposed for Golden Bay will take up a lot of productive land. Focus on more intensification.
- Requests Keoghan Road site be removed. Above the Onahau estuary, classified as high ecological value, of national significance in the Melville Schuckard report on birds, a Natural Outstanding Landscape. The site proposed drains towards the estuary, will result in negative impacts. This is a big estuary its flat and doesn't flush.
- Estuaries are important ecosystems; they store a carbon and host vulnerable species. These species are vulnerable to what housing brings, such as cats and rats.

In response to a question, Ms Wallace said it's the Keoghan Road development that is of concern for the development proposed in the Rangihaeata area.

Matthew Hay (31677)

Matthew is a co-director of Fineline architecture based in Nelson. He doesn't think the FDS should be accepted in its current form and noted:

- Does not reduce our carbon consumption.
- Agrees with the outcomes yet believes they're objectives.
- Suggested to establish a Nelson Tasman Urban Design Agency to present a vision of the future that the developers can actively participate in.
- FDS will create more commuter traffic heading in and out of Nelson and Richmond. Reliance on the car is not sustainable, will not meet the zero-carbon emissions target.
- Intensification needs to be close to all town centres, where there is demand for employment.
- To set development standards and not to convert highly valuable arable land into housing.
- Reduce the carbon impact of buildings with smaller building footprints and amenities within 20-minutes for cycling and walking.

Lindsay Wood (31705)

- Need to re-think the FDS, do not proceed with it as is.
- It's short on climate change responses and doesn't offer an effective strategy for this.
- We must plan for an energy challenged future. The FDS doesn't discuss energy or electricity, it disregards the NPS on renewable generation (see footnote on page 10). This is a mandatory document, one that plays a vital role to the wellbeing of NZ its people and environment.
- The FDS offers solutions to the wrong problems.

David Ayre (31708)

From Question 40 of the survey, he noted:

- Need to focus on limited medium growth, the world's population increase is 1% and falling. Need to re-build our towns and cities as intensified communities. Urban intensification will handle that degree of limited growth.
- The FDS hasn't acknowledged the magnitude of climate change issues or discussed the impacts of the same.
- The draft FDS references the zero-carbon act and makes no attempt on how to carry it out. Early FDS webinars said that "*we don't need to consider the zero-carbon act*". Need to half our greenhouse gas emissions by 2030, that's a 7.5% reduction every year.
- If our population is increasing, then every target is therefore more difficult to meet. We're trying to learn how to be sustainable for the next thousands of years.
- Consider where Nelson airport will go and flooding in Nelson city, now. No discussion on civil engineering to cope with more frequent and serve storms, such as a retention dam in the Maitai Valley. These major land use issues should be considered and discussed with the community.

Suzanne O'Rourke, Fonterra (31715)

Suzanne O'Rourke and Robb Stephens from Fonterra, noted the following:

- Fonterra's interests relate to two manufacturing sites, in Brightwater and Takaka.
- Are seeking additional wording to the FDS for outcomes three and five. For development to happen in areas that avoid existing incompatible activities.
- The Takaka factory has a buffer of land that wraps around the site. The FDS identifies an area of T-139 that could be redeveloped for residential purposes of up to 50 lots.
- Fonterra uses that buffer land to service storm water disposal. If residential land is developed near the site, there needs to be consideration around where the stormwater is disposed.

Ms O'Rourke's technology dropped out and Mr Stephens confirmed those were the main points relating to their submission. They will come back with an answer to the question if both sites plan to remain the same size.

Trevor Chang (31722)

Trevor thanked the panel for the opportunity to express his views. He has lived in Tahunanui for over 70 years and noted:

- The local and national decisions made for the Tahunanui area and often without discussion or consultation with affected parties.
- New housing needs to be prioritised especially for young families.
- Removing all on street parking is not best for the area, and destructive for the commercial, medical and private aspects of the community.
- The high-density residential plan for Tahunanui does not align with the inundation plan.
- An opportunity exists to make this area available for high density low value housing, with its alternative transport links to the CBD.
- Any structural damage to the Waimea dam could endanger lives in Brightwater.
- The 2004 construction plan commissioned by the Council has not been enacted.
- If we have six storey units, we will see a sewerage and stormwater problems.

Yachel Upson (31624)

- There is a level of vulnerability around the human aspects of the decisions processes.
- There is a focus on consumerism, rather than experiential activities:
- This model appears to overlook demographic and social economic factors.
- Research has shown that 15-minute cities show how far people are typically willing to go. Suggested adhering to the best-known models and to be careful about the inputs on the scope and calculations we make.
- Cities that focus on mental, physical and cultural health are inclusive by their nature.
- Need to address advertising of consultation and would like to see permanent billboards with this information on it.

Ray Hellyer (31733)

Mr Hellyer did not appear.

Questions for Council officers:

Cr Ogilvie:

- Can farmers move soil without a consent?

Mr Johnson (Tasman District Council Environmental Policy Manager) confirmed that removing or filling in a wetland is a prohibited activity. If its dry land and doesn't have wetland vegetation, soil can be moved under the TRMP permitted activity rules. Yet the land spoken about seemed to be a wetland.

Answering another question, Mr Johnson confirmed that wetlands don't need to be mapped or identified as a wetland, it depends on the composition of plant species. The definition is, if it has more than 50% wetland species and intermittently wet then it's classified as a wetland.

Deputy Mayor Edgar:

- From Dr Lemke's submission (31625) and others.
 1. Would like to see an overlay map of where the Mapua wetland sits in relation to the FDS map and what the ecological values of the wetland are.
 2. Are there areas we need to look at for wildlife corridors? A few submissions have talked about these and not just in Mapua.
 3. For levels of parks and reserves, the question is around amenity for intensification, when its 5% of the value of the development. Wondering if there is different metrics used for more intensified areas? Whether we need to consider how that's done?
- From the Fonterra submission
 1. Are there land use compatibility issues?

Have we assessed sensitivity for land use compatibility as part of our assessments? Does this leave any orphan sites i.e., small cut off areas that aren't viable as they're too small to be productive?

- *Would like clarification, did we say that “we don’t need to consider the carbon-zero act” as mentioned by David Ayre.*
- *A submitter on the levels of parks and reserves, the question is around amenity for intensification he was talking about 5%, when its 5% of the value of the development. Wondering if there is different metrics used for more intensified areas? Whether we need to consider how that’s done?*
- *Regarding sunlight, comment on whether the rules are currently meet within our RMPs or if rule changes will be required.*
- *Mark Lile mentioned affordability of intensified options, he mentioned they don’t become cheaper because of height, our current deliveries of multi-story dwellings are high end, if intensifications is there to support affordability, what are the conditions that support that.*

Questions from Thursday’s submissions from Nelson Tasman 2050

- *Submitter 31457: Mentioned that Council’s should complete a carrying capacity study, is that a piece of work we have done or is it something we need to do?*
- *Mix use on Queen Street. There was discussion several years ago, of the mix use of development around the South side of Queen Street, is interested to know why that wasn’t re-considered.*
- *The Urban Regeneration Agency might be considered outside the scope, it could be progressed between the two Councils as part of the Joint Committee. Doesn’t expect staff to do the research but wants to know the process to look at it as an option and if the Joint Committee would authorise funding to look at it.*
- *Outcome five, with the phrase ‘net demand’ being the incorrect metric, would like some consideration on that.*
- *Question 15 in the survey talked about intensification happening slowly over time, submitter 31459 mentioned this.*
- *Submitter 31316 mentioned T114 having higher capacity, to be looked at.*
- *Submitter 31457 mentioned site T17 also having higher capacity then what’s identified.*

Councillor McGurk

- *Would like commentary on incentives and disincentives on our DC’s, policies, in that area. On our regulatory process and fees and charges and incentivising the behaviours that we want to see.*
- *Re soil capacity and productivity for T136, which keeps coming up, reinforcing it’s an issue for many.*
- *From Dr Lemke’s submission on 5% would like the rules clarified around the Mapua Ruby Bay area with that.*
- *Tom Kennedy from save the Maitai talked about the huge amount of infrastructure required in the Nile and Milton Street areas to support that. Would like a report on what’s been planned on the infrastructure upgrades and summarise where we are at with it and confirm if the infrastructure talked about has the capacity to handle it.*
- *The CCTO for development can we have reference to the Auckland model and how that worked. Panuku and provide a summary on how big it is.*

- *Mr Lindsay Wood referred to the building research association, NZ brands standards for emission reduction and would like reference to that.*

Cr Maling

- *Is the Rangiheta Head area in our proposed in our ONL*

Deputy Mayor Bryant

From Thursday's hearing 28 April

- *Two submitters talked about rural residential, both are not currently in the FDS, is that something we can do? For the one in Spring Grove what are the infrastructure requirements?*
- *T136 Mr Malcom, could we have more information on what is proposed. An adjoining neighbour spoke on the effects it would have on people in the area if a subdivision would go ahead.*
- *Further to the Malcom submission to a further 1500 hectares could be available for subdivision would we want to consider that?*
- *The rate of uptake seems to vary upon whose submitting. Can we have clarity on the likely uptake across the different zones.*
- *Would like to know the effect Council charges have on development. What is the percentage of cost on development (an average cross the two districts) and if it can be used as a tool to slow development as some are advocating?*

Ms Kara-France offered the closing karakia and the hearing was adjourned at 4.58pm.

Tuesday 3 May 2022

Present: Nelson City Council – Mayor R Reese, Deputy Mayor J Edgar and Councillor B McGurk

Tasman District Council – Deputy Mayor S Bryant, Councillor K Maling and Councillor D Ogilvie

Iwi representative – Ina Kumeroa Kara-France

In Attendance: Tasman District Council – Group Manager – Service and Strategy (S Edwards), Environmental Policy Manager (B Johnson), Urban Growth Coordinator (J Deans), Policy Planner (M Bengosi), Project Manager – Environmental Policy (A McKenzie), Executive Support Officer (A Brough), Environmental Policy Administrator (N Armstrong) and Executive Support Officer (G Drummond)

Nelson City Council – Councillor R Sanson, Councillor G Noonan, Strategy and Environment Senior Analyst (C Pawson), Group Manager Environmental Management (C Barton), Senior Governance Advisor (M Macfarlane),

Chairperson, Mayor Reese welcomed everyone to the meeting and opened the meeting with a karakia.

The meeting adjourned at 09.09am and resumed at 09.11am.

Cynthia McConville (31455)

Ms McConville raised an objection to the proposed development at 42 Campia Road. While Golden Bay needs affordable housing, Rangihaeata is not a suitable location for affordable housing. She outlined her reasons for this view:

- Out of context with most of other properties in the area.
- There is a potential risk to wildlife from the proposed development.
- Challenges with grey and black water as well as roading.
- T163 should be removed from the FDS.

The meeting adjourned at 09.16 and resumed at 09.40am.

Daniel Hames Port Tarakohe Services Limited (31826) also speaking for Joan Butts (31714) Port Tarakohe Services Limited

Mr Hames, Director of Port Tarakohe Services Limited, spoke about Port Tarakohe development.

- Requested that the master plan for the port and surrounding land be included in the FDS. Growth is constantly underestimated by the Council.
- Big part of the FDS is to have housing and work nearby. An 82 hectare abandoned concrete site has been redeveloped and is infrastructure ready. Port Tarakohe has far less useable land.
- Significant and increasing development of sea farming, which needs ever expanding land use for storage. Council is expecting a five per cent increase in mussel farms. Land operations will need to grow accordingly.
- Need to utilise all the land on their site to allow for growth. Request approval for the two business areas currently zoned for industrial.

In response to questions, the quarry works under existing use rights and they are putting together a longer term plan for it now. The quarry won't go any further towards Pōhara. Longer term they are looking to move the quarry on the site. Through appropriate health and safety it can all work in with aquaculture development on site. All the rock in Golden Bay is coming out of that quarry, essential works continue as the only other option is quarrying miles away with all the implications.

Mrs Sonja Antonia Lamers and Mr Tony Aldridge for Wakefield Homes (31609)

Mrs Lamers and Mr Aldridge spoke about the need to provide housing suitable to meet the housing requirements in Wakefield.

- Need to be more creative and build smaller more affordable housing that fits with needs of the community.
- Did an extensive survey in 2020, which found a need for more rental homes and retirement accommodation. Too many big houses are being built in new subdivisions. 447 households are currently on the waiting list for suitable housing.
- Development plans could include inclusionary zones to allow this type of building. Queenstown used this approach to develop more. Habitat for Humanity has a similar approach.
- The Council needs to give clearer direction to developers.

- Need to assess what impact any increase in housing has on infrastructure and land. Need to focus on urban intensification, not sprawl.
- There is the issue of convergence of heavy traffic through the Wakefield area. Have had discussions with local Police and have some viable alternatives proposed.
- Have a responsibility to future generations to get this right, sadly we have dropped the ball in recent years.

In response to question, they clarified that F on the map could be used for light industrial or commercial by changing the roading infrastructure.

The meeting adjourned at 10.15am and resumed at 10.49am

Robin Whalley (31351)

Mr Whalley raised the following concerns,

- The FDS feedback form suggests pre-ordained answers.
- He has funding available for projects but hasn't invested in Nelson for last 10 years largely due to regulatory challenges.
- Need to have a bigger picture long term view. What will the world look like in 2050? What businesses won't exist anymore and what new businesses will be in place? Should obsolete buildings be used for housing? If so, need to reassess and potentially rezone these areas.
- Use of Port Nelson a good example of a totally underutilised asset, largely being used for container storage.
- Rapid rate of change not being addressed by regulations.

In response to questions, Port Nelson should be developed with a blend of mixed use housing. The development of this area could reduce noise issues coming from the container storage. This could be developed from a variety of funding sources such as a joint venture between council and private parties. There is no shortage of capital, just a shortage of potential opportunities.

When comparing Nelson/Tasman with the regulatory picture in other cities, it is far more complex and expensive to develop here. The interface between the Council and private industry needs to be reassessed to remove barriers to development in Nelson that aren't in places like Whakatane.

Chris and Gill Knight (31746)

Mr Knight raised concerns for the Tahunanui area.

- Primary concern is the six-storey blocks with no car parks proposed in FDS. Noted the government reforms in the RMA space and wondered if the FDS is trying to get ahead of central government.
- Tahunanui already has issues with flooding, traffic volumes and lack of parking and is at risk for earthquake, liquefaction, slips and coastal erosion. Before plans for more intensification progress these existing issues need to be resolved. Any development needs to be looked at with a climate change lens.
- Tahunanui is a destination and is one of Nelson's key assets, don't want this ruined with development. If any multistorey buildings are to be built, Council needs to consider where they can best be built.
- Need to think seriously about what decisions are made now and the cost to the whole city.

- Focus on environment impacts rather than development opportunity.

In response to question, they confirmed housing stock in Tahunanui is suitable for existing needs. They noted that in their view the land isn't suitable for the development of multi-storey buildings, as you don't need to dig down far to hit sand or even water. Also Council would need to look at rerouting traffic flows as they are already a major problem.

Mrs Alison Pickford (31211)

Mrs Pickford raised the following concerns:

- The Strategy needs to be future focused and not be business focused.
- Environmental impacts round the world all showing increasing environmental change for the worse, need to consider multiple challenges like moving access corridors further back from the shoreline, hunger will be more of a risk in the future due to sea stock depletion and the need to consider innovative approaches like overseas such as sponge cities.
- Long term predictions suggest the climate will be hotter and there will be water shortages.
- The collapse of forest is already visible in the back country.
- The Council needs to focus on environmental protection by reducing private transport and providing cheap and effective public transport, having council driven composted collection, planting more trees, and restoring and developing wetlands.

Michael Mokhtar and Mark Morris (31687)

Mr Mokhtar and Mr Morris came to voice support for Mr Mokhtar's property, T194, being included in the FDS. They noted:

- The land is in close proximity to Wakefield, has access to transport and supporting infrastructure, is in proximity to Tasman's Great Taste Trail and has no known stability issues. The land is currently zoned as rural 1 land but the land hasn't been productive.
- The subdivision complies with the FDS requirements - noting that section size will need to be reassessed to allow smaller sections to meet the demand for smaller sized houses in Wakefield.

In answer to questions, they unsure of how many lots could be on the 8.9 hectare section, they have not completed an assessment yet but approximately fifty lots could be created. In regards to connecting to the existing wastewater line, it is near capacity so an upgrade may be required as a Long Term Plan project. As there is another development underway this will need to be a priority for the LTP. They have had discussions with Homes for Wakefield and are open to undertaking a project with them developing smaller housing.

Ali Howard (31790)

Ms Howard commended the panel on sitting through days of hearings to enable democracy. She noted:

- She supports having a strategy for urban development. The focus needs to be on community and meeting the demand for housing. Projections show the only age group projected to grow in future in Nelson is over 65.
- She doesn't support development outside urban areas, particularly the two proposed in the Maitai. Thousands of people have told the Council in a variety of ways that they don't want the Maitai developed. There is still no recognition of the public's opinion.

- She commends the Council on declaring a climate emergency. Reducing greenhouse gases is of importance. Nelson City Council's submission to central government suggests more needs to be done urgently. Future development needs to consider carbon emissions from the business case stage and onwards.
- The need to exhaust all other options before considering any greenfield development, noting brownfield can be developed quicker and more efficiently.

In response to questions, she doesn't support greenfields development in Berryfields, there are plots in town which could be developed. This development doesn't help house prices.

Mark Morris, on behalf of Richmond Baptist Church (31614)

Mr Morris voiced support for T112, which is the church's land for intensification.

- Approximately two thirds of the land is undeveloped field. The Church would like to see land developed for safe and affordable housing down to a 200 sized plot in discussion with Habitat Nelson.
- Under the FDS criteria, the land is near shops, biking trails and schools, has access to sewer and stormwater and is above flooding level.
- The planned residential development would have a buffer of a commercial development before the bypass. A roading link would be required between Arbor-Lee and Champion roads for access to the site.

In response to questions, the church needs to be zoned as commercial to allow suitable activities. If there is any development of the existing site it would be in the gravel area. Development in the commercial area would need to have height restrictions due to the powerlines. It could potentially be used for commercial storage or depots. The proposed road would bypass the aquatic centre, so wouldn't impact on the aquatic centre activities.

Peter Olorenshaw (31791) – NELSUST

Mr Olorenshaw raised concerns over carbon dioxide issues,

- Need to consider certain topographies - for example no consideration of float homes, redesigning existing dwellings into smaller multiple dwellings, the building of tiny homes which would be relocatable if environmental impacts require.
- Speed of intensification underestimated –suggest intensification is needed at twice the projected rate. New dwelling yield could produce 29,700 new dwellings. 455 new residences could be created by utilising the car dealerships in Nelson city land.
- The demand study is dubious - asking what people want rather than what need.
- Covid has shown that while most people work from home some of the time, they will still need to work in urban areas and their kids will need to go to schools.
- We need to build in rather than out.

In response to questions, car yards and car parks leads people to seeing the city as car focused, rather than people focused. He considers these areas should be used as mixed use residential. Whatever the mechanism is, there's the opportunity for redevelopment. If tiny homes are mobile, potential environmental issues like flooding are less relevant as the houses can be moved. They could also be grouped to create attractive villages/suburbs.

Mr Colin Garnett (31388)

Mr Garnett raised concerns mainly related to Tasman area,

- A lot of highly productive land is being used. Questioned some of the assessments done, T115 had a land use capability of one yet it ends up in the FDS as a four. 19 hectares of T120 should be a zero but somehow gets a score to enable development. Berryfields should have a soil classification of zero yet has a four. Brings the whole assessment into question. Development appears to be sidestepping the assessments and houses are just appearing everywhere.
- Rural three is a misnomer. It was meant to be 25 per cent developed but this isn't happening and most consents are non-compliant. Need to change rural three to rural residential as it is giving the big developers opportunity to do as they like.
- Why aren't Rough Island and Rabbit Island not being looked at? There's a lot of room there for development.

It was noted that Rough and Rabbit Islands are Crown land which the Tasman District Council administers on the Crown's behalf. In response to questions, Mr Garnett clarified that to enable the rural three settings, wastewater issues could be offset by composting toilets or septic tanks.

Debbie Bidlake, Martin O'Connell and Sue Brown Federated Farms New Zealand (31820)

Ms Bidlake discussed:

- The need to protect what's left of highly productive land.
- Should be building in and up not out. The NPS for highly productive land will support this approach and is not the same as the FDS direction.

Mr O'Connell discussed:

- More intensification in places like Wakefield, Murchison and Tapawera. With all the hops development, housing for staff is needed. Development needs to use existing infrastructure.
- Once houses go next to agriculture, there are bound to be reverse sensitivity tensions that lead to complaints.
- Make use of what areas are already developed. Needs to be plan and council led, not developer led.

Ms Brown discussed:

- Tasman has made it simpler for second dwellings to be on a property, such as tiny homes. Why is this not done in Nelson?
- Need to think about some more creative alternative options, leasing land and parking tiny mobile homes on it.

In response to questions, they clarified that in Golden Bay there have been a lot of remote workers, since Covid the number has increased in terms of people living in Golden Bay and working remotely. Murchison, Tapawera, Wakefield are all full, there is a huge demand for labour and housing.

The meeting adjourned at 12.40 pm and resumed at 1.22 pm

Gary Clark (31595)

Mr Clark raised concerns around his land, T125.

- The 2019 FDS assessment supported commercial zoning, but the previous owner didn't want to change zoning. Now Mr Clark wants to change zoning, and he has struggled to get engagement from Tasman District Council.
- He has now been told the land has flooding and inundation concerns and that iwi have concerns over rezoning, but in 2019 none of these issues appeared. He hadn't heard of any issues with iwi until he was advised by the Council. He noted that the land has been heavily modified so he is unsure what the concerns are.
- There isn't a lot of commercial land in Māpua and what there is isn't on suitable land. T125 is one of few suitable sites suitable for intensification.

In response to questions, Mr Clark is unsure what issues iwi have to date. He noted that he has tried to engage but hasn't been able to progress the matter. He thinks it might be about the water take on the property. He considers that development of his land is an opportunity to provide more employment in the Māpua area, and it is an opportunity to provide currently missing services like a supermarket and medical centre. He would aim to develop seven hectares of the 11 available into commercial, depending on need. The site would tie in with other nearby commercial operators. Only recently purchased the last block of land so he hasn't had the opportunity to engage with local community groups.

Joe Roberts (31662)

Mr Roberts submission relates to a piece of land owned next to proposed T102.

- Subdivision is already underway in T102 and he would like to develop his land at the same time. He needs a decision as there is the potential to connect to subdivision infrastructure.
- Will yield at least 40 sections, that could be available very quickly. Almost shovel ready.
- There is some land with potential flood risk, but this could be mitigated.

Andrew Spittal, Spittal Properties Limited (31809)

Mr Spittal raised concerns around two greenfield developments near existing urban areas.

- Developments should to connect to existing communities and the councils need to make sure there is enough land to keep building houses to meet demand.
- There are 560 sections in his current development, 75 percent have already sold. Starting to run out of land if we are going to meet demand. His last release of land sold in five minutes.
- Can't see intensification meeting needs. The FDS has identified a lot of good sites.

David and Vicki James (31541)

Mr James raised concerns for Tahunanui:

- Proposed six-storey buildings are not suitable for the area, if they must be built, they need to back onto banks.
- There are already issues with parking and traffic and stormwater failing now. The latest sea level rise report hasn't been covered in the FDS. The council needs to address these existing issues before adding more to pressure on the systems.
- He proposes that any new developments need to either be owner occupied or have a minimum lease term of three years to make sure that they provide accommodation for locals.
- Need to stop building on the most fertile land.

In response to a question, preference would be maximum three-storey buildings with parking on site and owner occupied.

Chris Fryberg (31685)

Mr Fryberg referred to flaws in the secondary proposal of the FDS:

- According to the draft FDS there are 3200 proposed dwellings in T168 and T166, but these are already consents for Aporo Valley - it's a rural-residential valley. There will be radical consequences on amenity value.
- Page 69 of the FDS states that these new sites are one community but that is misleading as they are 11 kilometres apart by road, they are on different roads, and residents children will attend different schools.
- T168 is already affected by coastal inundation, which is only likely to get worse.
- Appears a lot of disadvantages for the sites being left out of the FDS.
- There are 300 landowners in T166, T167 and T168, yet in FDS says there are a handful of owners.
- No mention is made of the previous objections raised. T167 has already been through a consent hearing, the outcome was to keep the amenity value.
- Page 70 has a table in colour which shows outcomes against scenarios, option seven has poorer outcomes than option six. There is no employment in these areas, the kids need to be sent to schools, this will generate more greenhouse gases.

Joanna Santa Barbara (31636) – Nelson Tasman Climate Forum

Ms Santa Barbara raised the following concerns:

- Greenfield development has the highest climate change impact, particularly by generating carbon emissions. The FDS needs to focus on cutting carbon emissions by half. So, the councils need to target a seven per cent reduction per year.
- The recently release report on sea level rise means considerable replanning will be needed.
- Tasman can't afford the sprawl, is already amongst the worst in the world with carbon emissions according to Stats NZ. Amongst the worst car users. We can't afford that reputation.
- Sprawl development is an ongoing burden on the Council. Instead, money needs to be focused on good public transport.
- Greenfield development will further put pressure on the Council's resources.
- She has expertise in energy saving and happy to share this with the Council.

Hayden Taylor spoke for Mrs Rowena Smith - Ngāti Apa ki te Rā Tō Charitable Trust (31552)

Mr Taylor and Mrs Smith provided some clarification around their submission.

- There was some confusion with the Council around the land area and potential zoning. Clarification was provided to Council staff.
- Clarification on site T195, referred to a large piece of land that is owned by the Crown. It has been part of a land swap agreement with Ngāti Apa. It's a 2000 square metre piece of land not the larger piece of land which is owned by the Crown and administered by Department of Conservation. The comments refers to the bottom red corner of the site.

- The residential zone and papakāinga zoning would be a good fit.

The meeting adjourned at 2.47pm and resumed 2.51pm.

In response to questions, they propose this lot is used as papakāinga zoning. There might be a marae for sleeping/community hall. There wouldn't be a large development and it would be sympathetic to the land. Acknowledged mana whenua for the considerations around the community centre and wider community.

The meeting adjourned at 3.02pm and returned at 3:20pm

Mr Gaire Thompson (31853)

Mr Thompson spoke to his report noting:

- There is too much development on good horticulture land by Richmond. Should build on the hills (e.g. land between Nelson and Richmond). Benefits of building on hills are: cheaper, down-hill drainage (less infrastructure required), fewer issues with multi-storey buildings restricting views and sunlight (supports healthy homes).
- Relocatable buildings in coastal areas (e.g. Mapua) should be allowed. Infrastructure is already there.
- He doesn't support intensification of Mapua, as it will destroy the town's character.
- He supports development of the ex-forestry block on the coastal side of the Moutere highway.
- He doesn't support three storey buildings proposed by Government for Nelson. Shade and blocking view are issues.
- He opposes eight storey blocks for social housing in Nelson CBD area.
- Development on Walters Bluff is a good option (terrace style), close to town, gets the sun.
- Need to protect horticultural land, to feed people and export food.

In response to questions Mr Thompson stated that he is currently putting five apartments on top of what was a single storey building, but inner-city intensification is expensive and difficult. He is opposed to development along SH6 Wakefield due to potential of speed limits reducing, which will increase travel times.

Jackie McNae (31819), on behalf of Ahimia Ltd (R & S Griffin and M & L Griffin)

Ms McNae spoke on behalf of Ahimia Ltd noting that they:

- Support development of N-100, as it will create great recreational links and won't impact established neighbourhoods. Two small accommodation units being established here as a pilot project for smaller homes. Site should support mixed density development, with three storey buildings in some areas.
- Want T-114 amended to include Ahimia land above Angelus Ave (Special Housing Areas), over 7ha, currently Rural Res. Consent for mixed housing development has been obtained. Working through geo-tech issues.
- Support the Upper area at 218 Champion Road. 170 ha, provides recreational (mount bike park) and environmental values. Need planning provisions to support commercial activity here.

Jackie McNae (31803) on behalf of S & D King

- Supports T-17. Some physical constraints on the site, but where possible, they want to subdivided to 500sqm lot sizes. Developers are working on a development proposal, and are waiting for zone change to finalise the development.

In response to a question, Ms McNae advised that they did not think a Plan Change for this site was the right process (due to scale and timing).

Jackie McNae (31821) on behalf of Bill and Erica Lynch

Ms McNae spoken on behalf of Bill and Erica Lynch, noting:

- They support T-033 being included in the FDS. The land once supported an orchard, but became difficult to run in an urban environment with cross boundary issues. They have a vision of mixed density, a level of high and medium density around the lake and lower density around the steeper slopes. The site is inland, elevated and adjacent to existing residential zone.
- The site employment opportunities here (e.g. small café and childcare facility).
- Tasman District Council needs to update compact density rules in the TRMP. The rules currently cause issues around micromanagement and prescription.

Jackie McNae (31814) on behalf of Pharmalink and New Zealand Hops

Ms McNae spoke on behalf of Pharmalink and New Zealand Hops noting:

- They are landowners on Appleby State Highway, requesting to re-zone their properties to rural industrial zone (currently mainly rural 1). Critical industries for the region. Zoning correction would match what is already consented on site.
- Without rezoning, they will have to continue to apply for resource consents for their activities.

In response to questions, Ms McNae confirmed they want both properties zoned rural industrial.

Jackie McNae (31811) on behalf of Mahau and Dayson Nominees

Ms McNae spoke with Barry Thompson and Michael Thompson.

- The joint submission, supported T-117 and T-178 being used for business growth. Would like sites to be added to the Richmond South Plan Change.
- There is a need for more business land. They are committed to redevelop T-117 and T-178 once rezoned.
- Mr Thompson's current development plans: development for Trinder Engineering, including a small office block, already have resource consent to use a residential property as an office space, Brown estate would like to develop their landholding around and including Three Brothers Corner.

In response to questions Ms McNae advised that once rezoned they intend to develop (for business) the property along the frontage of Gladstone Road. Access points off Gladstone Road with back exit near the railway reserve. They want traffic diverted through Poutama Street.

Jackie McNae (31806) on behalf of Project & Ventures Ltd and on behalf of Richmond Pohara Holdings Ltd (31813)

Graeme Dick spoke for Projects and Ventures:

- He requested a meeting over his proposal for land development in the Braeburn and Mahana area.
- He considers the FDS should be amended to look at growth needs with a high growth methodology. Currently it will not achieve what is necessary to gain adequate supply and demand balance.
- He supports intensification for a range of housing densities.
- Growth elements should be available in all settlements. Limited supply increases unaffordability.
- He questioned why Hira was removed from FDS as a potential development site.

Ms McNae spoke for Richmond Pohara Holdings Ltd:

- They support growth for Golden Bay.
- Half of the property is a Special Housing Area (SHA), with resource consent for 73 residential allotments.
- Not in the FDS due to iwi raising concerns over cultural heritage, being a site of significance, the risk of flooding and having a possible wetland.
- They want elevated areas (owned and quarried by Golden Bay Cement) to be identified as a residential area. Happy for lower areas to be left out, to work with iwi on their concerns for those area and monitor flood mitigation issues.

The meeting adjourned at 4:40pm and resumed at 5:55pm

Jackie McNae (31804) on behalf of McCliskie and Marr

- Wants their property in Golden Hills Road included in the FDS for rural residential. Would like this to then be included for rezoning in the Tasman Environment Plan (TEP). The McCliskie property is 11.5ha and the Marr property is 13ha. Currently rural 1 closed, where subdivision is prohibited.
- Original owner planted a vineyard which was unsuccessful. The land has some level of productivity, but it is not as good as the Waimea Plains. The Marr's removed the vineyard.

Joanna Hopkinson (31754)

Ms Hopkinson noted:

- She supports re-zoning land in Murchison, as it will allow for needed growth. Current zoning has stopped natural growth. Noted that if she hadn't developed a motel into residential housing, six professionals would have had to leave.
- Conversation with staff and landowners suggest Murchison FDS numbers are optimistic. Concerned number of sites will be reduced (e.g only a few sites will actually be rezoned and developed). She questioned what the realistic yield is for Murchison.
- Ms Hopkinson questioned differing information on Murchison and other rural towns growth. Webinar referenced a study which indicated Murchison would not grow. FDS states Murchison is experiencing growth pressures. Wants to see the referenced study.

Nic John and Jo Tuffery (31834) (late submission)

- Does not want Nelson/Tasman to become a Tier 1 environment under NPSUD.

- FDS should consider protecting cultural and heritage areas. NPS allows FDS to be tailored to do this. The Councils lack a Strategy or capability in the heritage space.
- Changes to the RMA to exclude people from the process, won't allow for best outcomes. Council signed up to the Urban Design Panel, which mentions the need to incorporate a wide range of stakeholders at a regional and neighbourhood level.
- FDS needs to be measured. Make it easy for people to understand and respond to the change that will come out of it.
- Community should be at the centre of the FDS. Focus on building communities and what the community wants to achieve as a region. FDS leaves development of urban environment to developers.

In response to questions, Mr John explained that we need to respect the values of the Tier 2 environment (greenspaces, not becoming a mini large city with high rise buildings). Need to create an environment that balances intensification with things our community values (e.g walkable city, maintain heritage and cultural values).

David Lucas (31777)

Mr Lucas commented on:

- The need to retain Nelson's small provincial city values (including the connection with nature and maintain heritage values). Inner city buildings should be multiple storeys. He objects to three storey townhouses elsewhere.
- The need to improve the FDS provisions to encourage inner-city apartments on the first and second floor of inner-city shops. Look to renovate more large historic homes into multiple dwellings.
- The need to include retirement village numbers in Nelson building statistics.

Julie Sherratt (31779)

- Wants further sites in Takaka to be included in the FDS. Small pockets of rural land between areas of housing, not far from Takaka (e.g Dodson Road). Pockets still zoned highly productive, but due to proximity to houses and size, they are no longer used for farming e.g., Dodson Road.
- Dodson Road is above the flood plain, inland from the coast, available sewerage system infrastructure here, next to a sealed bike path, within 2-3kms to amenities. People want to live here.

In response to questions, Ms Sherratt clarified that the Dodson Road area she was referring to is between the highway and Dodson Road. She does not know if the current landowners will be supportive of developing here, but they should have the ability to do so.

Ben Williams (31808) on behalf of Radio New Zealand Ltd

Mr Williams did not appear.

Kerensa Johnston (31700) on behalf of Wakatū and NRAIT

Iain Sheves commented:

- He is unclear on how Tasman Village sites will be serviced. There is no funding in the LTP.
- They would not support water sourced from Motueka river (transfer of water between catchments), on cultural and environmental grounds. Inconsistent with tikanga and the Treaty of Waitangi. Expensive and impracticable.

- Focus should be on sustainable developments that align with the carrying capacity of the proposed area.
- Only support intensification where budgets for infrastructure are in place, and where shared outdoors areas are provided.
- The market, getting building permission, and the typology of multi-storey residential projects makes them challenging to deliver in the region at an affordable level. Main issue is cost of land development.
- Need to detail in the FDS how to address the effect of infill housing on reduced private outdoor space and availability of existing reserves.
- They would like an agreed framework with Waka Kotahi for support and resourcing to deal with increased loading on the trunk roading corridor.
- The FDS focuses employment and commercial activities towards Richmond. He questioned what the economic future of Nelsons CBD is.
- FDS needs to acknowledge the de-carbonisation focus in the traffic sector.
- The FDS should avoid sprawl and maintain character by utilising greenbelt zones around greenfield development.
- They don't support low density rural development. It is inefficient and diminishes rural character.
- Little coordination between the Infrastructure Acceleration Fund (IAF) and FDS (eg. Horiorangi (IAF proposal supported by the Council but site rejected from FDS) and 100 Bryant Road Brightwater (included in the FDS but the Council did not support IAF proposal)). The Councils need to improve coordination between policy and infrastructure teams.
- Seeks the inclusion of Horiorangi in the FDS.

In response to questions, Mr Sheves noted that it is difficult to create empty space within developments when going from low density to medium/high density. The Councils need to give developers information on what open spaces should look like. Greenbelts around greenfield developments will create greenspace and promote intensification.

Mr Paul McIntosh - (31684) – Māpua and Districts Community Association

Mr McIntosh spoke on behalf of the Māpua and Districts Community Association covering the following topics:

- The pace and number of changes in Māpua is overwhelming.
- Need continued community communication (including providing updated plans). Improve co-ordination and effectiveness of the communications.
- Ensure the balance of increased development and reserves/amenities is right.
- Need more clarification on Māpua growth predications. They would like to see the basis of the information for the people coming to live in Māpua and working from home.
- Focus on working with the environment rather than against it (e.g. wetlands instead of artificial detention ponds).

In response to questions, Mr McIntosh advised that he did not think there are concerns around insufficient commercial land for business in the area. People do not want to consolidate

commercial activity around the town centre. They are not anti-growth. Need more information on active transport networks.

Susan Drew (31571)

Ms Drew commented:

- She is opposed to development in the Maitai. Protect it for future generations.
- Questioned why is development planned for in the low lying areas of Orchard Flat.
- Concerned about wildlife and environmental effects of development on the area.
- Need to protect highly productive land.
- Urbanise our city centres instead.

In response to a question, Ms Drew advised that she walks along Orchard flats (up to Kaka Valley) on a regular basis.

Mayor Reese thanked the staff for all their mahi and dedication to the work involved with the FDS.

A general discussion was held and covered the following points.

- Any questions the panel have will be emailed to Council staff.
- Concern about whether staff will be able to address the hearing questions in time to meet the deliberations report deadline.
- Ms Kara-France requested the panel move into confidential session at 7:38pm.

Moved Cr Maling/Cr McGurk

SH22-04-2

That the public be excluded from the following part(s) of the proceedings of this meeting. The general subject of each matter to be considered while the public is excluded, the reason for passing this resolution in relation to each matter, and the specific grounds under section 48(1) of the Local Government Official Information and Meetings Act 1987 for the passing of this resolution follows.

This resolution is made in reliance on section 48(1)(a) of the Local Government Official Information and Meetings Act 1987 and the particular interest or interests protected by section 6 or section 7 of that Act which would be prejudiced by the holding of the whole or relevant part of the proceedings of the meeting in public, as follows:

CARRIED

Reason for passing this resolution in relation to each matter	Particular interest(s) protected (where applicable)	Ground(s) under section 48(1) for the passing of this resolution
The public conduct of the part of the meeting would be likely to result in the disclosure of information for which good reason for withholding exists under section 7.	s7(2)(c)(i) The withholding of the information is necessary to protect information which is subject to an obligation of confidence or which any person has been or could be compelled to provide under the authority of any enactment, where the making available of	s48(1)(a) The public conduct of the part of the meeting would be likely to result in the disclosure of information for which good reason for withholding exists under section 7.

	the information would be likely to prejudice the supply of similar information or information from the same source and it is in the public interest that such information should continue to be supplied.	
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The meeting resumed in public session at 7.48pm.

Ms Kara-France offered the closing karakia.

The hearing concluded at 7:50pm

Date Confirmed:

Chair:

SCP Submissions Summary Report

Prepared by B&A for the Nelson Tasman Future Development
Strategy

Attachment for Deliberations Hearing Report

23 May 2022



Draft Nelson Tasman Future Development Strategy 2022-2052 – Submissions Summary Report for Deliberations

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1.0 Introduction

The purpose of this report is to summarise the submissions received on the draft Nelson Tasman Future Development Strategy 2022-2052 (**the FDS**). The report is organised as follows:

- Methodology used to summarise and ‘theme’ submissions;
- Summary of responses and key themes that emerged from the consultation survey including:
 - The FDS Outcomes;
 - The Proposal including the Core Part of the Proposal, the Secondary Part of the Proposal and the greenfield/brownfield split;
 - Intensification areas proposed in each town;
 - Greenfield areas proposed in each town;
 - Growth in the rural towns; and
 - General comments.

2.0 Methodology

The following methodology was used to summarise and analyse submissions received on the FDS:

- Hard copy submissions were inputted into the submission database and any attachments were read and summarised.
- Submissions were then analysed by responses to each question. Submissions were read and coded according to key words or key themes. This produced a list of approximately 10-20 common themes that emerged across all submissions and guided the analysis. Given the timeframes, submitters were not analysed by submitter as well.
- For each question, responses were filtered on whether the submitter agreed or disagreed and then filtered into the top 4 or 5 commonly occurring themes. For a number of the questions, particularly on the FDS outcomes, the themes and perspectives that emerged were similar whether submitters agreed or disagreed. In these instances, the analysis is grouped together. In other instances where there was a clear difference between those who agreed or disagreed this has been separated out.
- The top 4-5 commonly occurring themes for each question are listed in this report by order of occurrence, with some explanation of submitter perspectives on each theme. Example quotes from submissions are also used to reflect this.
- Given the large number of submissions received and vast range of topics and ideas covered in the submissions, the key themes and numbers of submitters are intended to be indicative and approximate. A number of minor themes were also raised in submissions however may not have been summarised in this report. In some instances, themes that were raised by only one or two submitters *have* still been included where it helps to understand the overall perspective – this has been done on a case-by-case basis to assist with the overall analysis.

3.0 Consultation Survey

3.1 General demographics

A total of 568 people responded to the survey during the consultation period (14th March to 14th April inclusive 2022), including 5 late submissions. Submissions were received from locations across Nelson and Tasman including the below and shown in Figure 1 below.

- 47% from Nelson
- 9% from Golden Bay
- 11% from Upper Moutere
- 6% from Richmond
- 5% from Mapua/Ruby Bay
- 5% from Motueka
- 4% from Wakefield
- 3% from Murchison
- 2% from Brightwater

The remaining 8% came from locations outside the region, or country, or locations within the region or not specified.

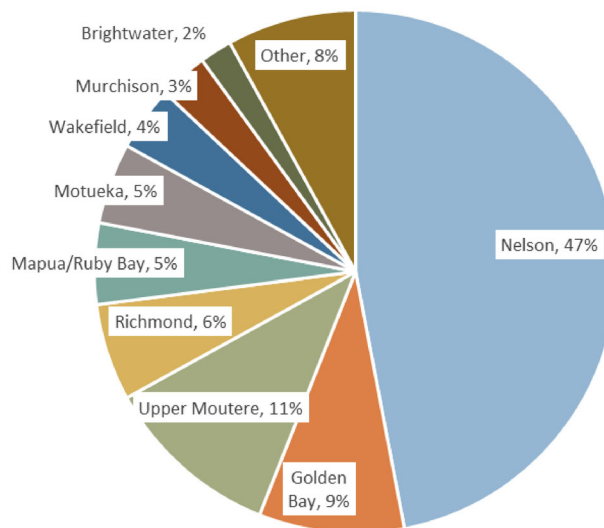


Figure 1 Location of submitters

3.2 Questions 1 – 12: Outcomes

There was general support for the outcome statements for future development in principle with the exception of Outcome 5, (sufficient residential and business land capacity is provided to meet demand), as shown in Figure 2 below with over 50% of submitters responding that they either agree or strongly agree with the rest of the outcomes. Details of responses to each of the outcomes is included in Sections 1.1.1-1.1.12 below.

Common themes that emerged from the submissions to all of the outcome statements included:

- There was strong concern that the FDS proposal will not achieve the draft outcomes, particularly because of the proportion of greenfield expansion in the plan and lack of prioritization of intensification;
- Concern about the secondary part of the proposal including Tasman Village and Lower Mouere as a growth area and how this does not reflect the outcomes (10 people);
- Concern that the use of the word ‘outcomes’ is misleading and these should instead be labelled as ‘objectives’ to reflect that they are the future aims of the FDS rather than having already been achieved. A number of submitters disagreed with the premise of the question and expressed concern that Council strategies and plans, including the FDS, are not currently supportive of the draft outcomes;
- There was general concern about how the Maitai Valley development reflects these outcomes with 29 submitters responding to these questions in relation to the Maitai Valley (also referred to as Kaka Valley, Mahitahi, Orchard Flats area).

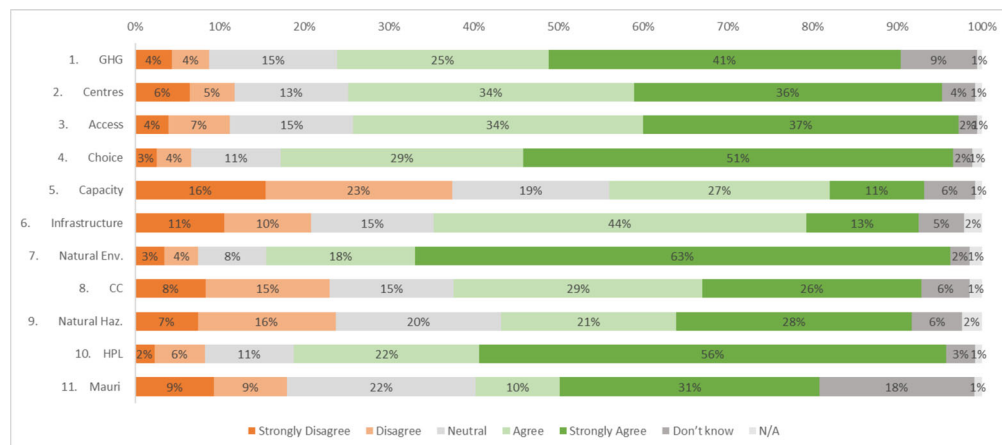


Figure 2 Responses to Questions 1 - 11 showing community perspectives on the FDS Outcome Statements

3.2.1 Outcome 1 – Urban form supports reductions in GHG emissions by integrating land use transport

A total of 345 people answered this question including:

- 143 people strongly agreed (41%) and 86 people agreed (25%)
- 15 people disagreed (4%) and 15 people strongly disagreed (4%)
- 52 responded with 'neutral' (15%)
- 31 responded with 'Don't know' (9%)
- 2 responded with 'N/A' (1%)

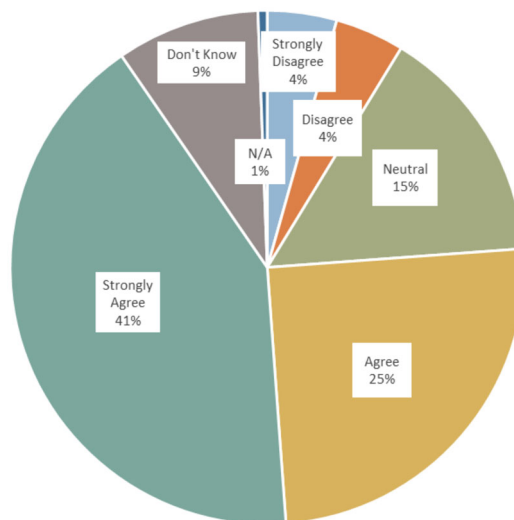


Figure 3 Response to Outcome 1 – GHG emissions

A total of 189 people provided comments to this question. Submitters expressed similar views in the comments whether they agreed or disagreed and are therefore grouped below. Key themes that emerged from the comments included:

- There was strong concern from submitters about how the strategy will achieve this outcome given the proportion of greenfield growth. Submitters expressed strong support for intensification of existing centres (81 submitters). This included 23 submitters who followed the NelsonTasman2050 template which raised similar issues;
- Approximately 19 submitters comments related to public transport noting that for this outcome to be achieved, low-cost public and active transport networks need to be provided to allow for reduction in car travel;
- Support for this outcome to be the core driver of the strategy and expressed the need to take urgent climate action (16 submitters);
- Some submitters supported this outcome and noted that there are many other ways to reduce carbon emissions beyond urban form (9 submitters);



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"This is simply vital for our future and the future of our kids" (Submission Number: 31247)

"Higher density housing within proximity of centres will reduce the need to use personal vehicles" (Submission number: 31257)

"Currently this is not reflected in this strategy as there is a lot of greenfield developments for stand-alone, larger houses away from work and school locations. This will create more traffic. We need more multi-unit compact developments." (NelsonTasman2050 submission)

"The latest report from IPCC released today (4/4/2022) states that we must reduce our GHG emissions by 43% by 2030 so integrating land use transport is imperative." (Submission number: 31276)

"Integrating land use and transport" is a vague concept. It seems to me that transport planning should always pay close attention to land use." (Submission number 31606)

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3.2.2 Outcome 2 – Existing main centres including Nelson City Centre and Richmond Town Centre are consolidated and intensified, and these main centres are supported by a network of smaller settlements

A total of 358 people answered this question including:

- 130 people strongly agreed (36%) and 121 people agreed (34%)
- 19 people disagreed (5%) and 23 people strongly disagreed (6%)
- 48 responded with 'neutral' (13%)
- 14 responded with 'Don't know' (4%)
- 3 responded with 'N/A' (1%)

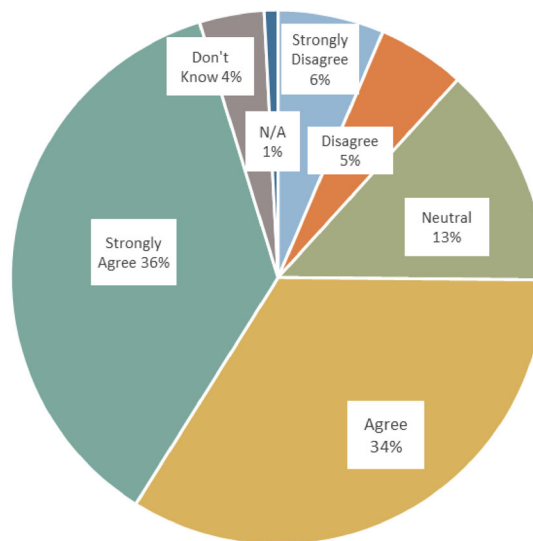


Figure 4 - Responses to Outcome 2 – centres

A total of 246 people provided comments to this question. Submitters expressed similar views in the comments whether they agreed or disagreed and are therefore grouped below. Key themes that emerged from the comments included:

- General support for this outcome with submitters favoring intensification within the core main centres and limiting greenfield growth in order to foster vibrant and lively places to live (109 submitters);
 - Many submitters who agreed, commented on the number of benefits that intensification provides including reducing GHG emissions via vehicle travel, improving public transport viability, access to social amenities and reducing overall footprint;
- Concern about the meaning of “smaller settlements” and the impact this may have on increased vehicle travel into the main centres if sufficient amenities are not provided for in these areas (21 submitters);



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- Concern that the strategy does not place enough priority on intensification of existing centres and too much growth in greenfield areas is proposed. The concern was generally due to lack of public transport, other infrastructure and amenities that will result in increased car travel and GHG emissions (19 submitters);
- From those who disagreed, there was concern about intensification due to the heights proposed and the impact this may have on views, sunlight and general amenity (16 submitters)
- There was support for intensification areas to be well-connected in terms of public and active transport and in existing centres where there is already infrastructure, amenities and employment (11 submitters);
- Some support for growth in smaller settlements to support the main areas (9 submitters);
- General misunderstanding of the question and language used (9 submitters).

"If more people live in our centres, then these will become more vibrant and interesting. It also means that people can actually walk and cycle to work instead of adding more cars to our traffic jams. However, I'm not sure that the proposed strategy is really going to achieve this. There are so many new greenfield sites in this strategy, that many people, who would otherwise buy in the centres, are likely to instead just buy a house in the suburbs." (NelsonTasman2050 submission)

"Unfortunately, with so much new greenfield development in the strategy, too many people will still buy a house in the suburbs instead of the centres." (Submission number: 31344)

"The concept of "network of smaller settlements" needs debate. Such settlements should be commensurate with village concepts that support the surrounding horticultural and agricultural industries plus specific location specific commercial activities such as tourism. These need based factors should be the criteria for any such network and not developer driven greenfield residential developments." (Submission number: 31515)

3.2.3 Outcome 3 – New housing is focussed in areas where people have good access to jobs, services and amenities by public and active transport, and in locations where people want to live

A total of 357 people answered this question including:

- 133 people strongly agreed (37%) and 122 people agreed (34%)
- 26 people disagreed (7%) and 14 people strongly disagreed (4%)
- 52 responded with 'neutral' (15%)
- 8 responded with 'Don't know' (2%)
- 2 responded with 'N/A' (1%)

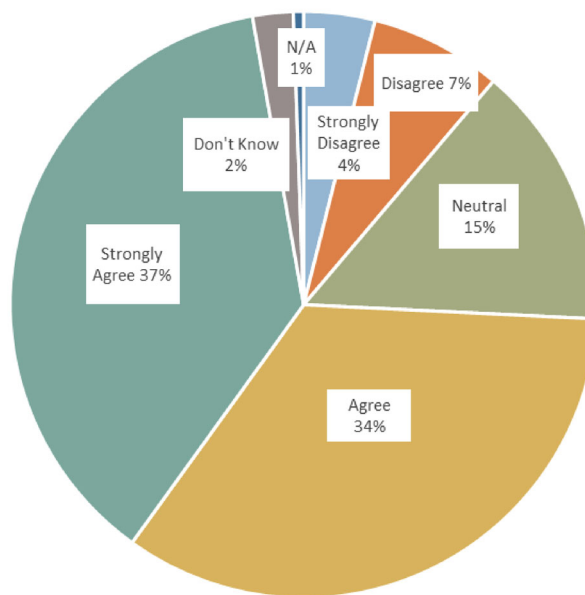


Figure 5 Responses to Outcome 3 - access

A total of 247 people provided comments to this question. Submitters expressed similar views in the comments whether they agreed or disagreed and are therefore grouped below. Key themes that emerged from the comments included:

- General feedback that this outcome is supported if the demand is for intensification but not supported if the housing demand is in greenfield areas. Strong support to prioritize intensification to reduce vehicle use and increase the proximity between where people live work and play (54 submitters);
- Whilst there was strong support for this outcome, there was concern amongst submitters that the proposed growth scenario does not reflect this outcome. This related to the proportion of



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greenfield expansion (29 submitters). This included approximately 16 submitters who followed the NelsonTasman2050 template that raised similar concerns;

- Some submitters raised concern about the ‘where people want to live’ part of the outcome statement because this may often be difficult in terms of natural hazards, vulnerability to climate change and potentially supporting greenfield development (27 submitters);
- Concern about the existing levels of public transport to actually support this growth and the increasing vehicle use with greenfield development (23 submitters);
- Concern about the impacts of intensification on existing property values, sunlight, outlook and character/amenity of existing areas (10 submitters);
- Importance of supporting this outcome in order to reduce greenhouse gas emissions (10 submitters).

"Yes I agree, but "new housing" can no longer mean low density big houses spreading over rural land. New housing means the end of green field subdivision - these just encourage car use - and the beginning of multiple high rise in the centres." (Submission number: 31353)

"Please amend the strategy accordingly to ensure that all growth will actually happen close to work and public transport!" (Submission number 31344)

"My concern is that buildings adjacent to my property will block the sun from my vegetable plot. The cost of food rising rapidly means my own productive garden is very important to me and my family" (Submission number: 31264)

"The very few Greenfield areas left near Nelson City centre are treasures that should not be developed as stated repetitively by the people of the region."(Submission number: 31195)

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3.2.4 Outcome 4- A range of housing choices are provided that meet different needs of the community, including papakāinga and affordable options

A total of 359 people answered this question including:

- 177 people strongly agreed (51%) and 100 people agreed (29%)
- 14 people disagreed (4%) and 9 people strongly disagreed (3%)
- 37 responded with 'neutral' (15%)
- 8 responded with 'Don't know' (2%)
- 4 responded with 'N/A' (1%)

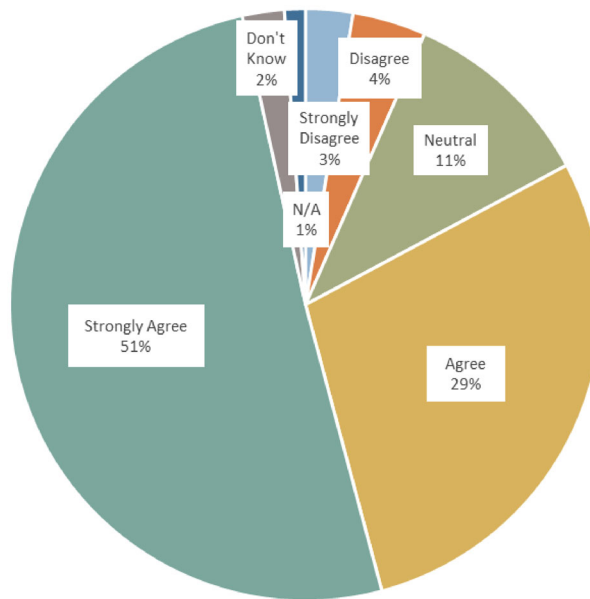


Figure 6 Response to Outcome 4 - Choice

A total of 229 submitters provided comments to this question. Submitters expressed similar views in the comments whether they agreed or disagreed and are therefore grouped below. Key themes that emerged from the comments included:

- Support for this outcome as it relates to providing affordable housing options for low-income families and first home buyers (55 submitters);
- Concern that the future development strategy will not achieve this outcome because of the perceived lack of diversity of housing options proposed (39 submitters);
- Support for intensification of housing within existing centres and reducing the number of greenfield options for growth and low-density subdivisions (25 submitters);



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- Changing demographics in the region are resulting in changing housing demand and preferences towards smaller footprint homes rather than larger detached dwellings. In particular, submitters noted the ageing population and the way that intensification can provide for the demand from older people for smaller homes, close to existing centres and amenities (24 submitters);
- Whilst there was general agreement with this outcome, there was some concern (4 submitters) amongst submitters on increasing height limits and the subsequent loss of sunlight and amenity;
- Some submitters did not understand what ‘papakainga’ means (2 submitters).

“I live in Tahunanui and have done most of my life, and I appreciate the atmosphere and feel of the place. Contributing to that feel is the casual relaxed and safe feeling of the area, with areas of minimal traffic which encourages a freedom for people of all ages to relax while out of their homes and on the way to the beach, sports ground and other recreation areas.” (Submission number: 31232)

“Too many big houses are being built in subdivisions that don’t cater for the downsizers and smaller budgets.” (Submission number: 31253)

“Although I agree with this statement, allowing large numbers of arguably unaffordable housing to be built in areas that do not have easy access to transport, and where the jobs available are not highly paid begs the question of the councils commitment to any climate action.” (Submission number: 31192)

“The ability to build multi storey apartments together with allowing up to 3 three storey apartments on sections of 600sqm or greater across the area identified will destroy the current amenity of those areas and should not proceed. The appeal of central Nelson is the low profile of housing that sees few properties dominated and overlooked by large multi storey structures.” (Submission number: 31294)

“We have such a housing shortage, soo many people in Golden bay currently needing rental properties or smaller properties as they are aging.” (Submission number: 31219)

“However, I assume that what you are going to develop / open up for development will be more of what we have seen in the last 40 years: rich people decide what new houses will be built (large ones, unaffordable for others), and poor people will have to make do with the leftovers, ie unhealthy homes or not enough smaller home, so living in their car or an old moldy house bus or caravan. Therefor I said Disagree.” (Submission number: 31335)

“I support this outcome but I can’t see anything in the strategy that will achieve it because there is no detail about how the developer-led preference for standalone housing will change to the smaller more affordable housing which is needed.” (Submission number: 314943)

3.2.5 Outcome 5: Sufficient residential and business land capacity is provided to meet demand

A total of 340 people answered this question including:

- 29 people strongly agreed (11%) and 91 people agreed (27%)
- 77 people disagreed (23%) and 16 people strongly disagreed (16%)
- 65 responded with 'neutral' (19%)
- 21 responded with 'Don't know' (6%)
- 3 responded with 'N/A' (1%)

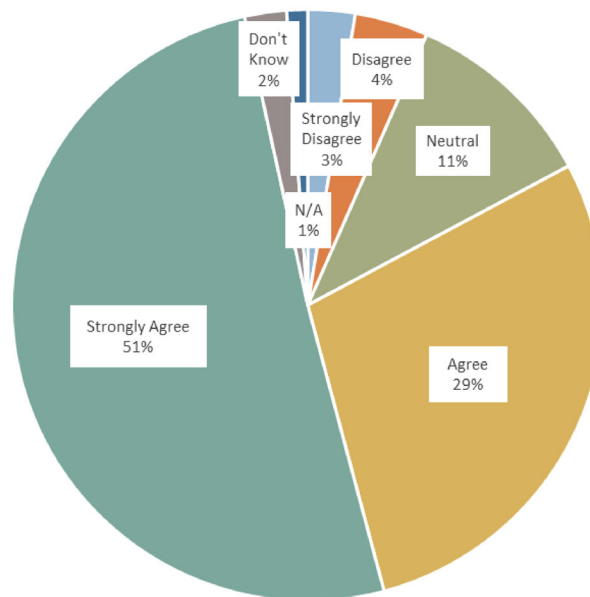


Figure 7 Responses to Outcome 5 - Capacity

As above, there was generally less support for this outcome than the other outcomes, largely due to the wording of 'meeting demand'.

A total of 234 people provided comments to this question. Key themes that emerged included:

- There was concern about the driving force of the future development strategy being based on meeting demand rather than meeting existing community needs and working within the carrying capacity of the environment (51 submitters). A number of submitters expressed concern that demand was the wrong metric to be using in order to reflect the other outcomes such as protecting the environment and prioritizing intensification and that it may result in increased greenfield growth and standalone housing that is led solely by developer demand rather than actual community needs and environmental capacity.



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- Concern that the proposal results in too much greenfield expansion and not enough residential intensification of existing centres (48 submitters);
- There was some concern about the growth rates and population projections used in the FDS and concern that the projected high growth pattern may not continue into the future (9 submitters);
- Concern that there is not enough focus on affordability within the future development strategy (9 submitters);
- Small amount of concern about the increasing height limits in existing residential areas and the impact this will have on sunlight, amenity and quality of life (7 submitters).

““Meet demand” is the wrong metric to decide the future of our region. It encourages a growth economy which is environmentally and socially damaging, and has major downsides (e.g. traffic congestion, resource depletion). Rather we should be protecting what makes our region so special and focus more on providing cheaper and more diverse housing options in our towns and centres.”

“But, for the love of God, leave good balanced, clean, healthy, pleasant living areas, like Tahunanui, ALONE. Those living on the hillside, looking out at the Tasman Sea vista do not want tall ugly buildings in their view. Those living at “ground level”, enjoying sun and fresh air, do not want to live next to tall ugly buildings.”

“There is too much planning for large, stand-alone housing. This is in line with the current trend to accommodate the rich, unproductive population and forget about the people who want to work here.”

3.2.6 Outcome 6: New infrastructure is planned, funded and delivered to integrate with growth and existing infrastructure is used efficiently to support growth

A total of 331 people answered this question including:

- 44 people strongly agreed (13%) and 146 people agreed (44%)
- 34 people disagreed (10%) and 35 people strongly disagreed (11%)
- 48 responded with 'neutral' (15%)
- 18 responded with 'Don't know' (5%)
- 7 responded with 'N/A' (2%)

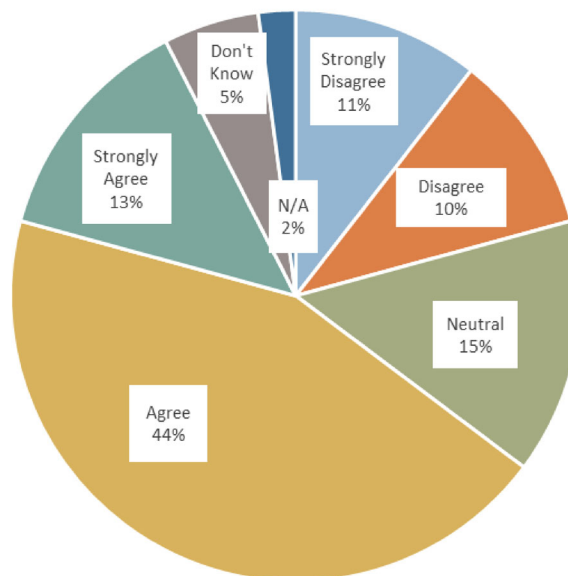


Figure 8 Response to Outcome 6 - Infrastructure

A total of 213 people provided comments to this question. Submitters expressed similar views in the comments whether they agreed or disagreed and are therefore grouped below. Key themes that emerged from the comments included:

- Throughout the questionnaire there was widespread concern about the capacity of infrastructure to service the proposed growth given the existing problems particularly the transport and three-waters network. Some submitters noted that trade-offs would need to be made between focusing on accommodating new growth versus maintaining existing infrastructure to support the existing population;
- Many submitters raised concern about the general focus of the future development strategy on continual growth and being driven by developer demand (43 submitters);



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- Particular concern about the affordability of infrastructure and ensuring that we focus on that infrastructure that factors in long-term shifts in urban form and transportation, with a particular focus on public transport and cycling that are less expensive to maintain in the long term (42 submitters). This included 23 submitters who followed the NelsonTasman2050 submission template which raised similar concerns;
- Concern about providing for new infrastructure *before* maintaining and upgrading existing infrastructure (17 submitters). In particular, submitters commented on challenges with the capacity of existing infrastructure;
- Concern about the greenfield/brownfield split proposed in the future development strategy with support for prioritizing infrastructure to allow for greater intensification of existing centres (16 submitters).

"This objective is important but we need to make sure that we focus is on infrastructure that we can afford in the long term and which supports healthier and less carbon-intensive modes of transportation, prioritising walking, cycling, as well as efficient and convenient public transport."

"I believe development should be encouraged where existing infrastructure can be best utilized to capacity, and increased ratings revenue received as a result. I think Councils should be wary of carrying all of the cost burden of 'new' infrastructure for greenfields sites, where the infrastructure cost per HUD is high (and other ratepayers end up subsidizing the cost as a result)"

"Growth for it's own sake is not desirable, conservation and sustainability are more important."

"Again this is growth-focussed and in a climate crisis, with planetary overshoot, catering for growth is entirely the wrong focus. Well-planned infrastructure is important though, especially infrastructure that supports healthier and less carbon-intensive modes of transportation, prioritising walking, cycling, as well as efficient and convenient public transport."

Those who were neutral:

- General perspective that the language used in this outcome is too vague and meaningless

3.2.7 Outcome 7: Impacts on the natural environment are minimised and opportunities for restoration are realised

A total of 348 people answered this question including:

- 220 people strongly agreed (63%) and 61 people agreed (18%)
- 14 people disagreed (4%) and 12 people strongly disagreed (3%)
- 28 responded with 'neutral' (8%)
- 8 responded with 'Don't know' (2%)
- 5 responded with 'N/A' (1%)

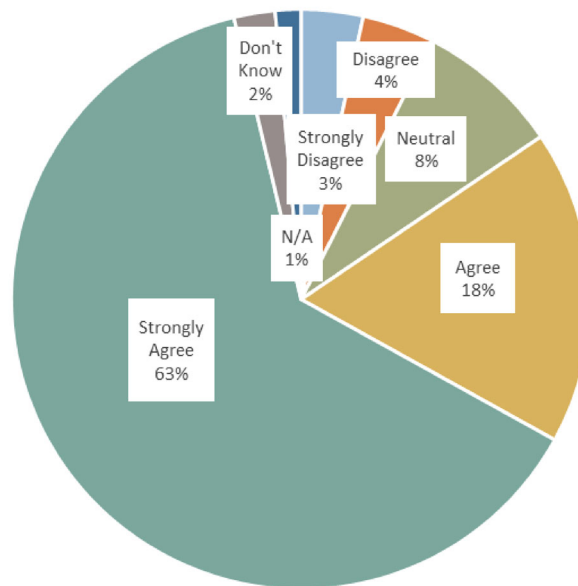


Figure 9 Response to Outcome 7 - Natural Environment

A total of 221 people provided comments to this question.

Approximately 184 people who agreed or strongly agreed provided comments including:

- There was support for this outcome being the key priority to guide the strategy as demonstrated in Figure 8 above (22 submitters);
- Concern that the future development strategy does not support this outcome given the proportion of greenfield expansion. Support for increased intensification to better protect the natural environment (55 submitters). This included approximately 20 submitters who followed the NelsonTasman2050 submission template which raised similar concerns;
- Support for restoration of the environment as it relates to waterways, resilience to climate change and biodiversity and integration of the FDS with other biodiversity strategies. Examples



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included integrated stormwater management within new subdivisions and restoration and revegetation of bush areas and streams (14 submitters);

- 5 submitters expressed comments about the Maitai Valley and concern around the impacts on the natural environment from this development

"Without our natural environment we are nothing. Maanaki whenua, maanaki tangata, haere whakamua."

"This would be wonderful if it was possible but I can't see how you could anticipate doing restoration work when everything is been devastated by residential housing and industrial areas."

"This strategy should be integrated with the Nelson and Tasman biodiversity strategies and the work happening as part of the Kotahitanga mō te Taiao Alliance. To align with best practice impact management, impacts on the natural environment should always first be avoided. If this is demonstrably not possible, then minimisation, followed by remediation are considered."

"Sure! But most of your growth projections do exactly the opposite."

Approximately 22 submitters who disagreed or strongly disagreed provided comments including:

- Concern that the future development strategy does not support this outcome given the proportion of greenfield development proposed (9 submitters);
- There was a small amount of concern from some submitters that the type of intensification proposed will not enhance the environment due to the increased height limits. These comments were largely from an amenity perspective (3 submitters);
- Concern that the outcome implies prioritization of development over the natural environment – suggestion that 'minimise' is changed to 'restricted' (2 submitters).

"As it stands the impacts on the natural environment are great from the FDS. Development is allowed on our good soils (anywhere on the Waimea Plains) and up valleys such as the Maitai Valley and Marsden which has huge adverse and reversible impacts on the natural environment. For these reasons I do not support any new greenfield development on the Waimea Plains and in the Maitai Valley."

"This sort of intensification does not enhance the urban environment".

"Unfortunately, I do not believe that the true impacts and costs to the environment has been recognised."

"The wording implies that the development is more important than the natural environment. If you change the word minimised (which is such an elastic concept that it has meant nothing in many historical cases of development), for 'restricted', then we have something that can make a difference."

Comments from those who were neutral generally reflected the above statements.

3.2.8 Outcome 8: Nelson Tasman is resilient to and can adapt to the likely future effects of climate change

A total of 348 people answered this question including:

- 90 people strongly agreed (26%) and 102 people agreed (29%)
- 51 people disagreed (15%) and 29 people strongly disagreed (8%)
- 51 responded with 'neutral' (15%)
- 20 responded with 'Don't know' (6%)
- 5 responded with 'N/A' (1%)

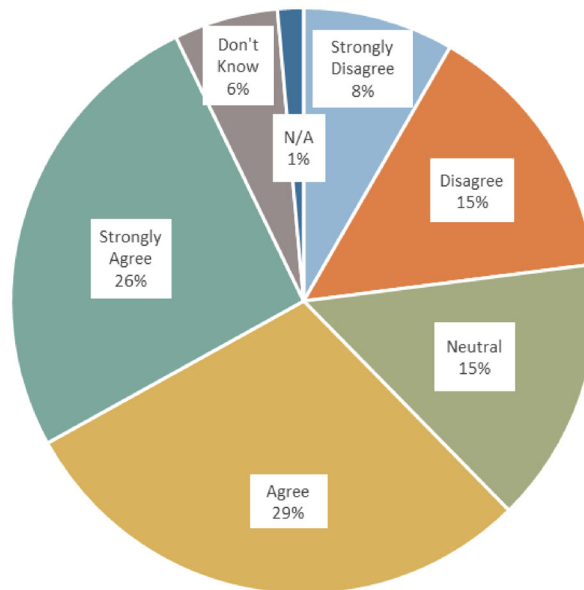


Figure 10 Responses to Outcome 8 - Climate Change

A total of 240 people provided comments on this question.

Approximately 137 people who agreed or strongly agreed provided comments including:

- Strong support for this as an outcome statement, however concern that the future development strategy does not reflect this though due to the proportion of greenfield land and growth on sites subject to flooding or sea-level rise (62 submitters);
- Strong support for this statement to be a key priority driving the future development strategy and that we should be planning for a greater reduction than 1.5C (22 submitters);
- Some submitters noted that mitigating the actual impacts of climate change through emission reductions should be the key priority rather than providing for more growth (8 submitters).



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Climate change will have an enormous impact on Nelson. Any new building in our region needs to be climate savvy in it's design to limit the impacts of flooding and drought.

I would go further and say that Nelson Tasman should have the aim of reducing climate increase to less than 1.5C. There is clearly a climate crisis and we should not only be resilient, we should be taking much more effective measures to reduce increases in average temperatures

Resilient communities are also about quality neighbourhoods, places designed to ensure people connect to each other and have easy access to quality green spaces. Green spaces can also have immense value as carbon stores and ecological diversity can buffer us from the impacts of climate change. The housing, climate change, biodiversity, and mental health crises can and should all be addressed together.

Absolutely this should be the goal. BUT you need a progressive agenda with hard choices and even harder limits to growth to achieve this, and I am not seeing it in your draft documents.

Approximately 69 people who disagreed or strongly disagreed provided comments including:

- Concern that Council's existing policies and strategies (including the FDS) are not doing enough to both mitigate and adapt to the impacts of climate change. In particular, comments related to the development of properties in areas subject to sea level rise and floodplains and providing for greenfield expansion that will increase vehicle travel and emissions (18 submitters);
- Concern that Council's focus should be on climate change mitigation responses and emission reduction rather than accommodating future residential growth (10 submitters);
- Concern that the FDS has not considered the impacts of people being displaced from coastal areas due to sea level rise (11 submitters)
- Approximately 12 submitters noted that many of the impacts of climate change are already beyond our control and it is not possible to handle these effects.

"Nelson Tasman should not make the effects of climate change even worse by trying to attract very large numbers of new residents from other NZ cities."

"I am uncertain whether Nelson Tasman is well enough prepared for the future effects of climate change and whether Councils are doing enough to ensure that residents are well enough aware of the need to be individually prepared for the effects of climate change."

"This is still too vague as a Councils climate conscious awareness, but in regards to the proposed plans to open up more "greenfield" developments based on projected population growths, does not seem to be offering the first mechanism to help with climate change, ie: leave existing land alone, and put the resources into facilitating solutions to make existing areas"

Comments from those who were neutral generally reflected the above statements.

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3.2.9 Outcome 9: Nelson Tasman is resilient to the risk of natural hazards

A total of 338 people answered this question including:

- 94 people strongly agreed (28%) and 70 people agreed (21%)
- 55 people disagreed (16%) and 25 people strongly disagreed (7%)
- 66 responded with 'neutral' (20%)
- 20 responded with 'Don't know' (6%)
- 8 responded with 'N/A' (2%)

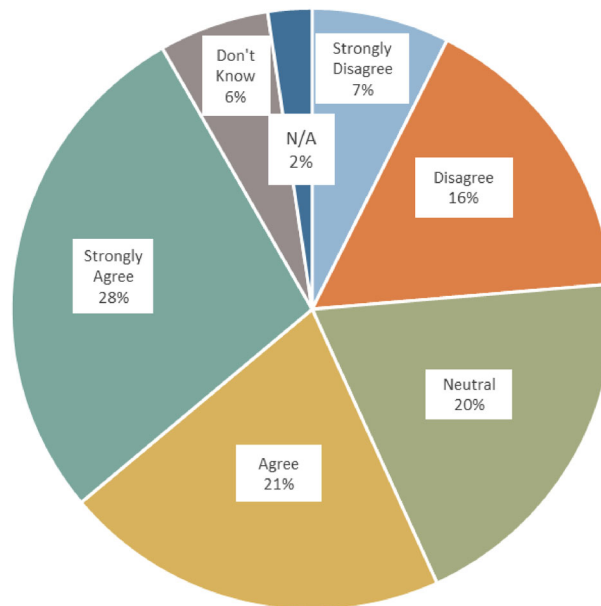


Figure 11 Responses to Outcome 9 - Natural Hazards

A total of 195 people provided comments to this question.

Approximately 96 people who agreed or strongly agreed provided comments including:

- General concern about how the strategy supports this outcome particularly in urban areas (32 submitters). This included approximately 21 submitters that followed the NelsonTasman2050 submission template which raised a similar concern.
- There was discussion on how this outcome could be achieved through mitigation or adaptation.
 - A number of submitters called for development to be avoided on areas subject to natural hazards, for example through managed retreat in coastal areas (15 submitters). This included some concern for existing developments that have already been constructed on areas subject to sea level rise.



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- Others supported development to be designed in a way to withstand natural hazards (7 submitters).
- Importance of the integration between both climate change and natural hazards, particularly in the increasing severity of weather events (9 submitters);

Approximately 58 people who disagreed or strongly disagreed provided comments including:

- A number of submitters disagreed, noting that the statement does not reflect the region's existing resilience to natural hazards. It is acknowledged that these Outcome questions should have provided more clarity that these statements are intended as objectives rather than reflecting the existing situation in Nelson Tasman. This included some concern that existing developments and those included in the future development strategy are susceptible to natural hazards and therefore do not reflect this outcome (36 submitters).
 - Approximately 18 of these comments related to the region's existing resilience to flooding and sea level rise.

Comments from those who responded 'don't know', 'neutral' or 'N/A' generally reflected the above.

"I have noticed that most proposed new greenfield areas have stayed away from areas at risk of flooding (including inundation due to sea level rise), fault lines and slip prone areas. However I'm missing a strategy for how our future urban areas will be resilient and future proof."

"As an objective outcome, I would agree. However, as a statement, it is obviously untrue. Nelson is proposing to intensify development at the lower end of Trafalgar St in exactly the area inundated by two tsunamis in the early sixties which pushed seawater up the Maitai as far as the Nile St Bridge. There is a long coastline on Lower Queen St with a school, residential, commercial area ridiculously exposed to tsunamis. Resilience has not been a priority to date."

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3.2.10 Outcome 10: Nelson Tasman's highly productive land is prioritised for primary production

A total of 347 people answered this question including:

- 194 people strongly agreed (56%) and 77 people agreed (22%)
- 21 people disagreed (6%) and 8 people strongly disagreed (2%)
- 37 responded with 'neutral' (11%)
- 12 responded with 'Don't know' (3%)
- 3 responded with 'N/A' (1%)

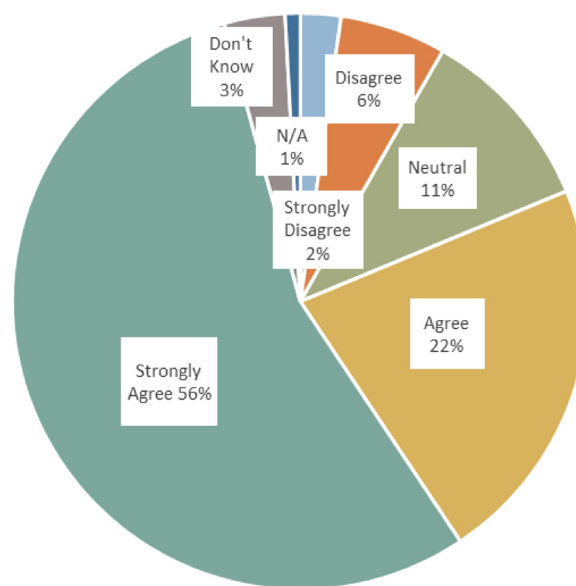


Figure 12 Responses to Outcome 10 - Highly Productive Land

A total of 234 people provided comments to this question.

Approximately 194 people who agreed or strongly agreed provided comments including:

- Strong support for this outcome to be a key priority in order to protect food protection for the region (82 submitters)
- Concern that there is already a lot of productive land being lost to subdivisions particularly around Richmond and Hope including Berryfields subdivision (25 submitters)
- Support for urban intensification as a way to protect highly productive land (17 submitters)
- Concern that the proposal for growth does not suitably protect highly productive land given the proportion of greenfield expansion (17 submitters)



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- Concern about the classification of productive land given that there are different levels of productivity. There were mixed views about this with some submitters thinking that marginally productive land located close to existing urban areas could still be developed, whilst others thought that this should also be protected. This also included some submitters expressing concern that fragmented land can also be protected for smaller scale productive activities (14 submitters).

Approximately 27 people who disagreed or strongly disagreed provided comments including:

- Concern about blanket cover for all agricultural land noting that not all rural land is of equal productive value. As above, there were mixed views as to whether all productive land should be protected or if land of lower productive value is ok (8 submitters).
- Concern that the proposed growth scenario of the FDS does not reflect this outcome (7 submitters)
- Approximately 4 submitters responded to the question that the outcome reflects the existing situation rather than an objective and disagreed given the existing loss of highly productive land to subdivisions such as Berryfields.

Comments from those who responded 'don't know', 'neutral' or 'N/A' generally reflected the above.

3.2.11 Outcome 11: All change helps to revive and enhance the mauri of Te Taiao

A total of 347 people answered this question including:

- 99 people strongly agreed (31%) and 32 people agreed (10%)
- 28 people disagreed (9%) and 30 people strongly disagreed (9%)
- 72 responded with 'neutral' (22%)
- 59 responded with 'Don't know' (18%)
- 3 responded with 'N/A' (1%)

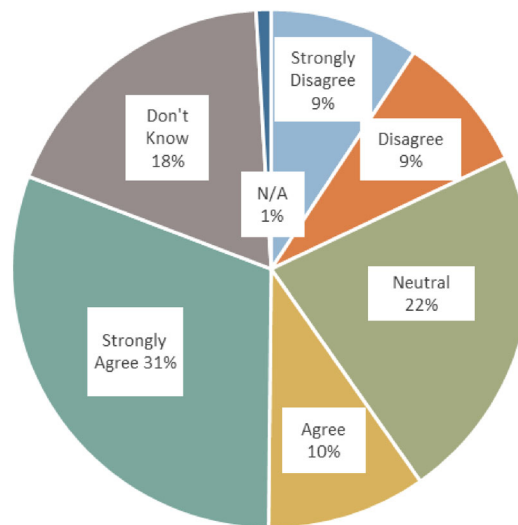


Figure 13 Responses to Outcome 11 - Mauri of Te Taiao

A total of 169 people provided comments on this question. Key themes from the comments were generally the same whether submitters agreed or disagreed.

- As above, a large proportion of submitters responded with 'don't know' or 'neutral' and this was reflected in the comments where a number of submitters expressed that they did not understand the language used (29 submitters). It has been acknowledged that a translation should have been provided to assist with this and will be provided in the final FDS.
- Concern about the use of the word 'change' given that some change may inevitably not support this outcome (29 submitters).
- A total of 26 submitters followed the NelsonTasman2050 submission template to answer this question. Whilst these submitters agreed, they raised concerns that the proposal does not actually support this outcome and the associated vision and mission due to the proposed greenfield developments and the impact of the type of growth proposed has on the environment. These submissions also were concerned that the strategy does not involve enough holistic partnership with iwi for the outcome to be achieved.



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- An additional 20 submitters also supported meaningful engagement with iwi to understand their aspirations and comment on this outcome.
- An additional 12 submitters raised concern that the proposal will not support this outcome.
- There was some support for this outcome to be a key priority driving the FDS (13 submitters).

"I don't think there is particularly clear evidence of this in this plan. With many of the waterways in a degraded state, intensification has the potential to push these beyond the tipping point. Water sensitive urban design is critical to development. The constructed wetlands practice note should be extensively implemented across the region in conjunction with new developments and intensification."

"The proposed developments create a bland and characterless spread of residential zones with no mana."

"The mauri of Te Taiao will best be protected by adhering to environmental principles of good stewardship not necessarily 'change' too much change too fast reduces the mauri of Te Taiao. Plan to facilitate and foster population growth in our area puts resources under pressure."

3.2.12 Regarding the FDS outcomes, do you have any other comments or think we have missed anything?

A total of 206 submitters answered this question. Key themes related to:

- General support for intensification of existing urban areas and reducing expansion into greenfield areas (41 submitters);
- Concern about the FDS not responding to the climate emergency enough or is not working towards a reduction in GHG emissions particularly through modal shift (40 submitters);
- Submissions from NelsonTasman2050 were concerned that calling these statements 'outcomes' is misleading and should instead be called 'objectives' (22 submitters);
- Concern about council engagement processes, the timeframes for consultation, the language used in the questionnaire and general process used to prepare the strategy (17 submitters);
- General concern that the high growth rates proposed in the FDS are not realistic and that community wellbeing and quality of life for existing population should be the goal rather than continual growth (9 submitters).

"There are two aspects that I feel are not highlighted enough or even contradicted: There has to be a clear reflection in any new housing considerations that we are in a climate change emergency and that it is absolutely crucial to make this first priority."

"I encourage Nelson and specifically our area, Tahunanui to consolidate and intensify housing and commercial to create a destination hub and stay ahead of the ever changing world".

"Do we need to encourage an ever increasing size in our community? I would rather see an ever increasing quality of life in our community. Good spirit, community strength and diversity. Healthy modest homes which will last, over and above mass produced characterless structures which may well not hold a good history or character."



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"We need as many apartments and townhouses as possible, especially in central Nelson. We need to look at areas of wasted land, particularly carparks that could be turned into housing."

"I am strongly opposed to increasing the use of land for housing in Brightwater Wakefield and Mapua. Much of this land is useful horticultural land. More importantly, the majority of these people who live in these properties will be travelling to Nelson on a regular basis. Possibly many of them will commute every day. This will simply clog up our roads, it is unlikely that people living in these villages will travel by public transport or bicycle."

3.3 Questions 13 and 31 The Proposal

3.3.1 Do you support the proposal for consolidated growth along SH6 between Atawhai and Wakefield but also including Mapua and Motueka and meeting needs of Tasman rural towns?

A total of 340 people answered this question including:

- 28 people strongly agreed (8%) and 66 people agreed (19%) – total of 27% agreed
- 56 people disagreed (17%) and 112 people strongly disagreed (33%) – total of 50% disagreed
- 54 responded with 'neutral' (16%)
- 17 responded with 'Don't know' (5%)
- 7 responded with 'N/A' (2%)

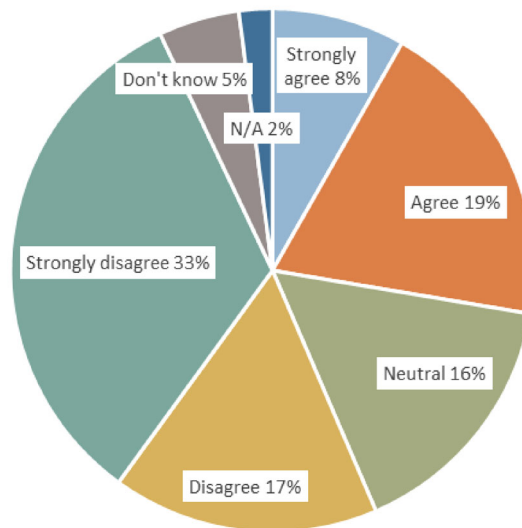


Figure 14 Response to Question 13 - The Core Part of the Proposal

A total of 248 people provided comments to this question.

Approximately 61 people who agreed or strongly agreed with the core part of the proposal provided comments. Key themes from these comments included:

- Significant proportion of submitters support the proposal for intensification within existing centres such as Nelson, Richmond and Stoke but concerned about the level of greenfield expansion into other areas (20 submitters);
- Support for growth in these areas given there is demand (13 submitters);



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- Importance of growth areas having existing infrastructure, transport and other amenities in place (10 submitters);
- Support for growth in Wakefield in particular given the demand for housing (8 submitters).

"Intensification (in particular) within proximity of the Nelson and Richmond CBD's, will achieve a number of outcomes including increased vitalization of the the areas, better existing infrastructure use, reduced reliance on personal transport (and increased use of public transport)."

"But with more cautions -- we can do this sensibly and keep Nelson looking beautiful, or we can junk it up by erecting tall buildings and eliminating native trees and plants. I live in Atawhai and LOVE its peace and quiet. I was in Richmond and Stoke a few days ago between 10am and 3pm -- so many cars, lots of noise and smelly exhaust. Spare me!"

"As long as smart and innovative thinking is undertaken around how these areas tie in to efficient transport options, sustainable & responsible use of resources (not just continuing to expand infrastructure at an ever-increasing cost to ratepayers)."

"I know that eventually we won't be able to avoid expanding into greenfields, but we should first do all that we can to avoid that by intensifying builds infill, permitting small and tiny houses to be constructed in peoples backyards, build higher buildings, drop parking requirements, improving options of public transport."

Approximately 152 submitters who disagreed or strongly disagreed provided comments. Key issues that were raised included:

- Significant concern about the extent of greenfield expansion that is proposed given the impact this will have on car dependency, traffic and increased greenhouse gas emissions as well as highly productive land. Support for intensification to be prioritized more in the proposal, particularly in Nelson, Richmond and Stoke (69 submitters);
- Approximately 25 submissions followed the NelsonTasman2050 submission template which raised similar issues to the above.
- Concern over the Tasman Village proposal and growth in Mapua (8 submitters)
- Concern about the capacity of infrastructure to support the growth (6 submitters);
- Small amount of concern about the height limits proposed and that the level of intensification is too high (6 submitters).

"Growth should be through high quality intensification rather than more urban sprawl."

"There is too much greenfield expansion - the same mistakes we have made in the past. Instead the FDS should concentrate development on existing centres in close proximity to employment, services and public transport."

"Neither greenfield land expansion nor more rural residential housing actually deliver the outcomes claimed in the FDS. All Tasman's rural towns should be allowed to grow through quality intensification, as long as there are enough local jobs. Where there is an employment shortage, future development must be limited to development that increases the number of jobs locally."

Those who were neutral:

- Some concern about the language of the questioning and combining too many elements of the proposal in one question.

3.3.2 Do you support the secondary part of the proposal for a potential new community near Tasman Village and lower Moutere (Braeburn Road)?

A total of 325 people answered this question and 5 people responded with N/A.

- 176 people did not support the proposal (53%)
- 41 people did support the proposal (12%)
- 27 people supported the proposal provided agreement could be reached with Te Atiawa (8%)
- 81 people did not know (25%)

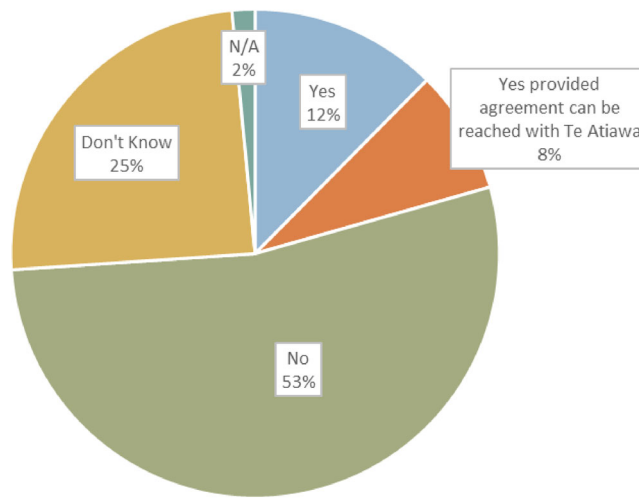


Figure 15 Responses to Question 31 - Secondary part of the proposal

A total of 194 people provided comments to this question.

Approximately 149 people who do not support the secondary part of the proposal provided comments including:

- Significant objection to the secondary part of the proposal was received with key concerns relating to:
 - Capacity of infrastructure and the cost of extending new infrastructure into this area to support development of the proposed scale (22 submitters);
 - The distance of the growth areas from existing centres and employment, and the resulting increase in vehicle travel and GHG emissions particularly as public transport is not feasible. Concern that this does not support the FDS outcomes seeking to integrate transport and land-use (52 submitters – including 20 submissions following the NelsonTasman2050 template);
 - General opposition to greenfield expansion (26 submitters);
 - The impact on the geographical features and landscape values of the Mourere Hills and surrounding rural character (11 submitters);



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- Concern about protecting highly productive land (13 submitters); and
- Not required to meet required population growth (generally across a number of submissions).
- Support for intensification of existing centres rather than expanding into new communities (18 submitters);
- Concern about the loss of rural landscapes (8 submitters); and
- Particular concern about T136 (Braeburn Road) (6 submitters) for the same reasons as above.

“There are so many hubs already in existence, creating more is not the solution. Instead intensification will allow the existing hubs to become more vibrant places full of life rather than silence.”

“This area is far away from jobs, it covers highly productive land, public transport will never work, the proposed densities will create more sprawl, not a compact village. This housing is not needed to meet Tasman’s anticipated housing needs over the next 30 years. It is also not supported by iwi.”

“A new town with 3200 houses is 7000 to 10000 people, more than Motueka? needs a few petrol stations, big supermarkets, pharmacies, hairdressers, shops, doctors, schools, kindergarten etc, most importantly jobs, jobs, jobs, which industries please? This number of people shall not commute daily to Motueka or Richmond! Double lane highways would be needed, big traffic, etc, the opposite what the FDS is about”

Approximately 30 people who responded with ‘yes’ or ‘provided agreement can be reached’ provided comments including:

- Agreed based on the assumption that it can support Motueka and Mapua economically given there is limited feasible growth available in Motueka (9 submitters);
- There is limited productive land in this area due to it being generally fragmented, in order to protect other more highly productive land from development (5 submitters).

3.4 Questions 14, 29 and 30 – Greenfield / Brownfield Mix

3.4.1 Where would you like to see growth happening in the next 30 years?

A total of 325 people answered this question as shown in Figure 16. Comments for this question generally reflected the statistics shown below.

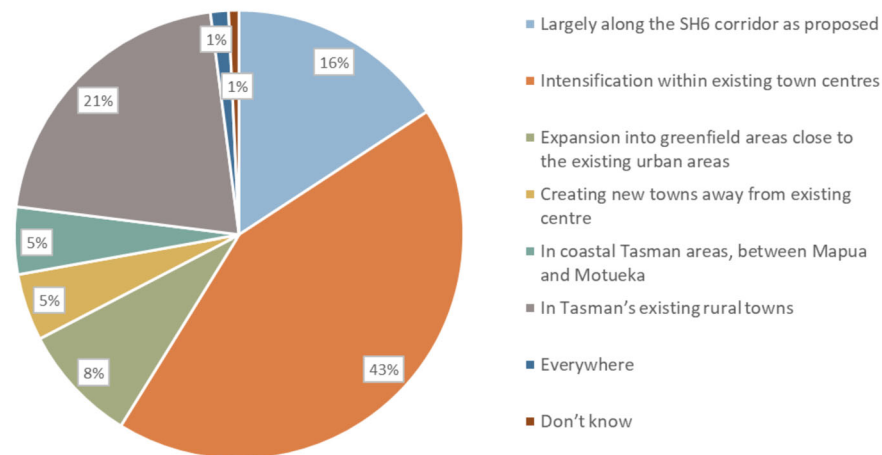


Figure 16 Responses to Question 14 - Where would you like to see growth happening in the next 30 years?

"Frankly, I would not like to see growth happening at all, but given local governments having little control over this I think the SH6 corridor as proposed makes sense (option a). Options b and c also make sense, although I am not happy with productive land being used."

"I would like to see small communities develop further to allow locals to shop and live locally. Particularly, I would like to see Tahunanui become a community unto itself providing a retail and community sector that encourages local shopping and community interaction and can be accessed by walking. As it stands, Council has encouraged SH6 'strip development' which is vehicle rather than pedestrian focused, and further has not established the retail or community environment or infrastructure necessary to allow locals to interact, shop and meet their needs locally."

"Why make this assumption? Show me where growth has led to improvements to towns like Nelson? especially this sort of growth as proposed."

"There is so much underutilized space within Nelson's CBD that intensified housing will not be harmful. In fact more housing above shops, multistoried apartments, and building on empty lots will bring a more healthy look to our town."

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3.4.2 Do you think we have got the balance right in our core proposal between intensification and greenfield development (approximately half intensification, half greenfield for the combined Nelson Tasman region)?

A total of 331 submitters responded to this question including:

- 6 people strongly agreed (2%) and 29 people agreed (9%) – total of 11% agreed
- 89 people disagreed (26%) and 145 people strongly disagreed (43%) – total of 69% disagreed
- 41 responded with 'neutral' (12%)
- 21 responded with 'Don't know' (6%)
- 6 responded with 'N/A' (2%)

There was not a comment function for this question.

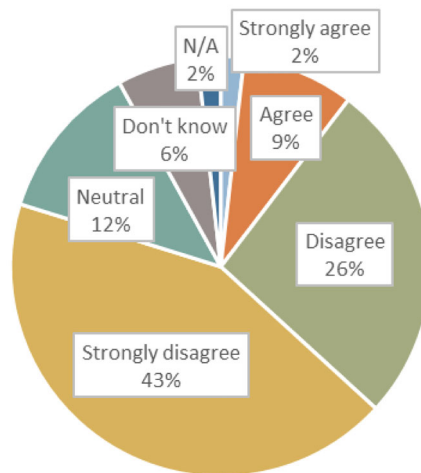


Figure 17 Responses to Question 29 - intensification / greenfield balance

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3.4.3 If you don't think we have got the balance right, let us know what you would propose. Tick all that apply

A total of 293 submitters responded to this question including:

- 147 people would propose more intensification (50%)
- 99 people would propose less greenfield expansion (34%)
- 32 people would propose less intensification (11%)
- 15 people would propose more greenfield expansion (5%)

There was not a comment function for this question.

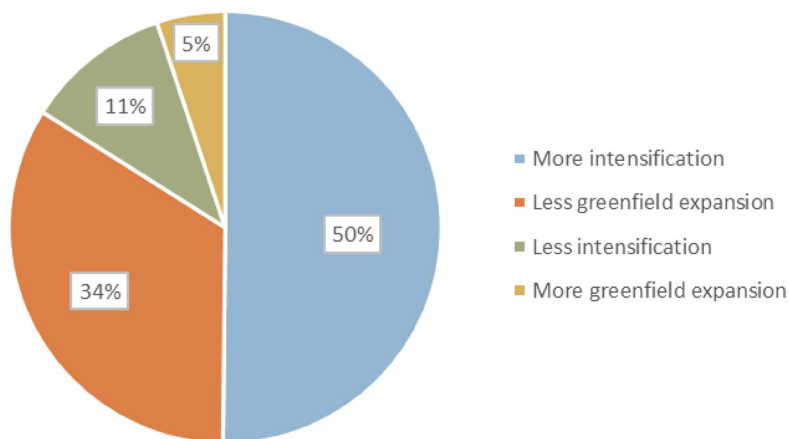


Figure 18 Responses to Question 30

3.5 Questions 15 – 21 - Intensification

3.5.1 Do you agree with the level of intensification proposed?

Figure 19 shows a summary of perspectives for Questions 15 to 21. Key themes and responses to questions 15 to 21 are detailed below and in general included:

- General agreement with the proposed intensification in the larger centres of Nelson, Stoke and Richmond.
 - Key theme was support for consolidating these areas to support intensification and reduction in GHG emissions and reduce ‘sprawling ribbon development’ along SH6.
- There was an even split of perspectives for the smaller settlements of Brightwater and Wakefield with roughly equal numbers of submitters who agreed or disagreed.
 - Key theme was general opposition to greenfield development and support for intensification within these towns whilst maintaining the rural character;
 - It appeared that a significant number of submitters did not know that intensification is proposed in these towns and is acknowledged this could be made clearer.
- There was a large amount of uncertainty amongst submitters for Motueka and no clear preference.
 - Again, a preference for intensification and reduction in greenfield expansion was raised.
- There was generally greater opposition to the growth proposed in Mapua than other areas.
 - General concern about creating a commuter suburb in Mapua that would be heavily reliant on vehicle travel to access other centres because of the lack of employment in the area;
 - A significant number of submitters raised concern that the label of ‘intensification’ is particularly misleading for Mapua given the nature of the areas proposed. It is intended that smaller housing typologies are provided for in these areas rather than only lower density, standalone homes.

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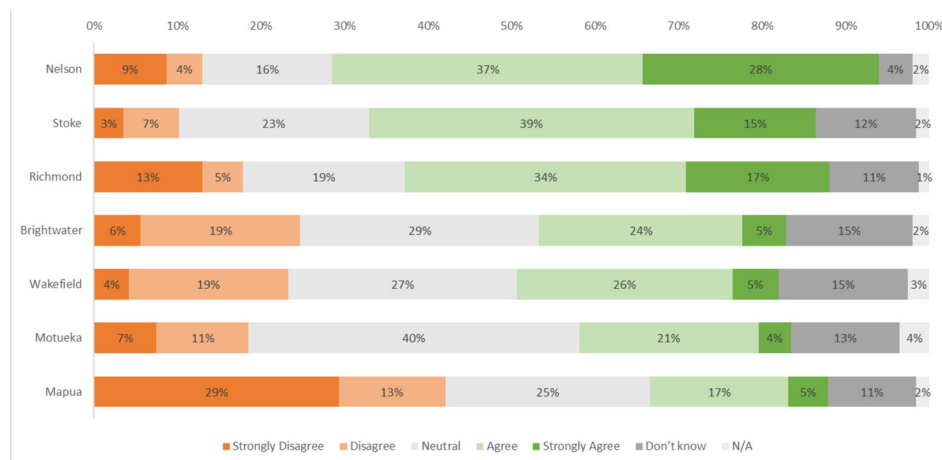


Figure 19 Responses to Questions 15 to 21 showing perspectives on the level of intensification proposed in existing centres

Nelson – Intensification prioritised

A total of 347 people answered this question including:

- 98 people strongly agreed (28%) and 129 people agreed (37%) – total of 65% agreed
- 15 people disagreed (4%) and 30 people strongly disagreed (9%) – total of 13% disagreed
- 54 responded with 'neutral' (16%)
- 14 responded with 'Don't know' (4%)
- 7 responded with 'N/A' (2%)

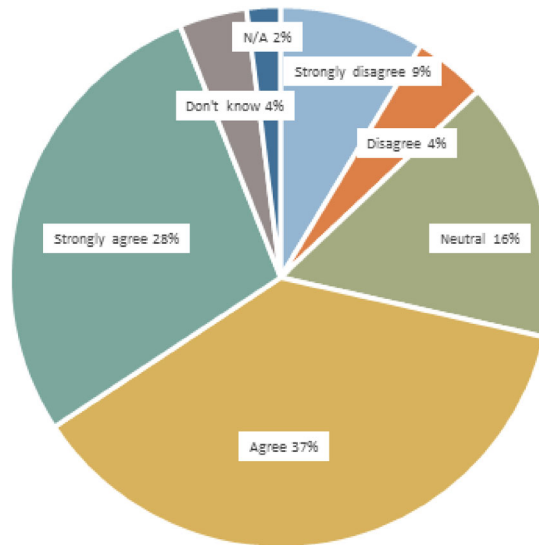


Figure 20 Responses to Question 15 - Prioritising intensification in Nelson

A total of 211 people provided comments in response to this question.

Approximately 146 people who agreed or strongly agreed provided comments including:

- Importance of prioritizing intensification and speeding up the uptake of this type of development (86 submitters). Concern that 'very slowly over time' is not prioritizing intensification enough and that this should be reflected in an increase in uptake rates and more comprehensively designed intensification;

"Great plan, but can we make sure that intensification is balanced with better living conditions? E.g. residential infill intensification just seems to pack more people into back sections instead of making sure that there are enough parks and open spaces, playgrounds or attractive streets."

"I would like to see small communities develop further to allow locals to shop and live locally. Particularly, I would like to see Tahunanui become a community unto itself providing a retail and community sector that encourages local shopping and community interaction and can be accessed by walking."

"Prioritising intensification within Nelson will both ensure that the city is a vital and lively centre, while preserving productive and recreational resources for the future."

"Speed it up."

- Importance of ensuring intensification takes into account impacts on surrounding properties particularly sunlight, views and general character/amenity (25 submitters);
- Importance of integrating this with public and active transport to reduce reliance on vehicle travel, as well as the provision of other infrastructure.

Approximately 34 people who disagreed or strongly disagreed provided comments including:

- Concerned about the loss of character, sunlight, amenity and impacts on quality of life resulting from intensification and taller buildings, particularly within Tahunanui (19 submitters);
- Support for increases in intensification in all areas and prioritizing this more (5 submitters).

Stoke – Around the centre

A total of 316 people answered this question including:

- 46 people strongly agreed (15%) and 123 people agreed (39%) – total of 54% agreed
- 21 people disagreed (7%) and 11 people strongly disagreed (3%) – total of 10% disagreed
- 72 responded with 'neutral' (23%)
- 38 responded with 'Don't know' (12%)
- 5 responded with 'N/A' (2%)

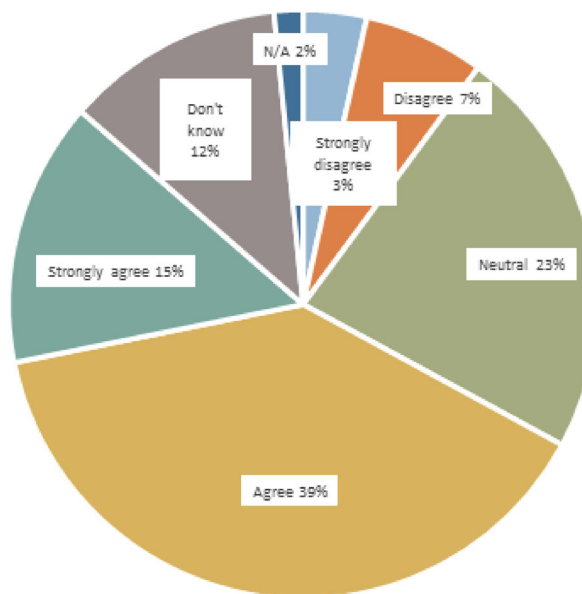


Figure 11 Responses to Question 16 – Intensification in Stoke

A total of 121 people provided comments to this question.

Approximately 82 people who agreed or strongly agreed provided comments including:

- There was support for the intensification of Stoke to increase the vitality of the centre of Stoke, but strong concern to ensure that this is done alongside improving living conditions and providing social amenities alongside intensification of residential areas (62 submitters);



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- This included approximately 23 submitters who followed the NelsonTasman2050 submission template that expressed similar views to above and focused on ensuring quality, comprehensively designed intensification.
- Support for ensuring good public transport links and cycle links to Nelson (9 submitters);

“Yes, we have lived there previously and it is at the centre of everything. Intensification here would be ideal because access to Richmond and Nelson and surrounding areas is relatively easy and at this stage quick, though getting into and out of Nelson can take time due to traffic. The amenities and services available in Stoke are extensive - it is a very easy place to live and work.”

“Great plan, but can we make sure that intensification is balanced with better living conditions? E.g. residential infill intensification just seems to pack more people into back sections instead of making sure that there are enough parks and open spaces, playgrounds or attractive streets.”

Approximately 20 people who disagreed or strongly disagreed provided comments including:

- Concerned about the loss of character and impacts on quality of life resulting from intensification and taller buildings. There was a mixture of views on the heights that should be allowed – concern about over 4-6 storeys (9 submitters).

Richmond – Right around town centre and along McGlashen Avenue and Salisbury Road

A total of 309 people answered this question including:

- 53 people strongly agreed (17%) and 104 people agreed (34%) – total of 51% agreed
- 15 people disagreed (5%) and 40 people strongly disagreed (13%) – total of 18% disagreed
- 60 responded with ‘neutral’ (19%)
- 33 responded with ‘Don’t know’ (11%)
- 4 responded with ‘N/A’ (1%)

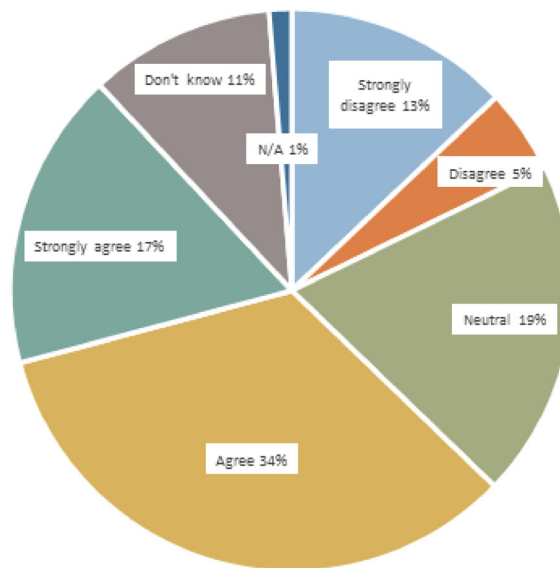


Figure 21 Responses to Question 17 - Intensification in Richmond

A total of 91 people provided comments to this question.

Approximately 54 people who agreed or strongly agreed provided comments including:

- Support for intensification but concern that this is not prioritized enough and there is too much focus on in-fill development rather than comprehensively deigned developments (22 submitters);

"Also, can we make sure that intensification is balanced with better living conditions? E.g. residential infill intensification just seems to pack more people into back sections instead of making sure that there are enough parks and open spaces, playgrounds or attractive streets."

- Concern that more public and active transport is needed to support the levels of intensification (9 submitters).

Approximately 52 people who disagreed or strongly disagreed provided comments including:

- Support for more intensification than what is proposed, as above (39 submitters). In particular a number of submitters picked up an error in the Richmond maps that show intensification through infill in the CBD rather than mixed use development. This has been fixed and intensification through mixed use development is intended in the FDS.
 - This included 23 submitters who used the NelsonTasman2050 submission template which raised the same issue.

"More intensification is needed, balanced with better living conditions"

"Why is the area along Queen Street only identified for "residential infill"? Shouldn't we allow for the highest intensity here? I would like to see comprehensive mixed use redevelopment along Queen Street."

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Brightwater – Around the centre

A total of 304 people answered this question including:

- 16 people strongly agreed (5%) and 74 people agreed (24%) – total of 29% agreed
- 58 people disagreed (19%) and 17 people strongly disagreed (6%) – total of 25% disagreed
- 87 responded with 'neutral' (29%)
- 46 responded with 'Don't know' (15%)
- 6 responded with 'N/A' (2%)

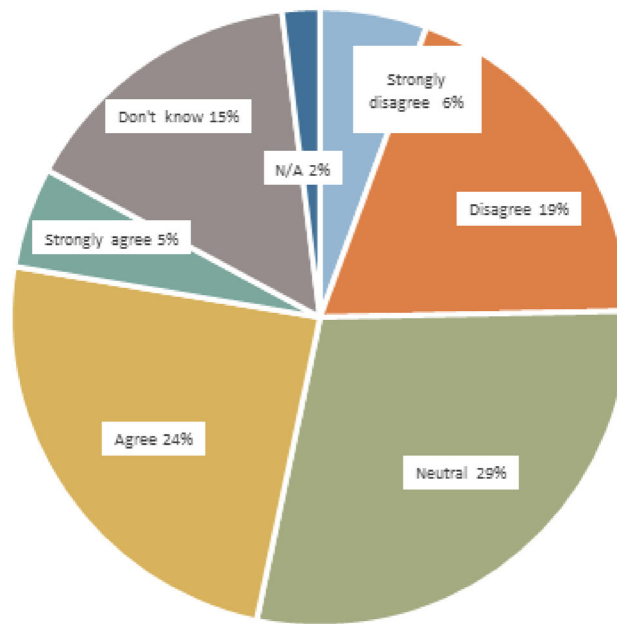


Figure 22 Responses to Question 18 - Intensification in Brightwater

A total of 115 people provided comments on this question.

Approximately 22 people who agreed or strongly agreed provided comments including:

- Support for intensification in the centre with mixed-use, commercial and multi-storey buildings in the centre (9 submitters);
- With the proviso that intensification retains existing character and amenity of the town (3 submitters).

"This is where an increase of population is needed to make this town thrive and not increase the frustration from traffic noise pollution in cities like Nelson and Richmond adverse to any pleasant biking option especially at the backward speed of 50km/hour!"

Approximately 66 submitters who disagreed or strongly disagreed provided comments that included:

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- Concern that there is not enough employment in Brightwater to support the level of growth proposed and will result in increased GHG emissions from travel to other areas (39 submitters)
 - Approximately 24 of these submitters followed the NelsonTasman2050 template.
- Concern that intensification may lose the rural village character of Brightwater and that height limits should be kept to 2-3 storeys (6 submitters).

"I'm not sure if there is enough employment in Brightwater to grow the population. Otherwise it only becomes a commuter suburb. I think there might be a need for smaller housing options though, which can be achieved by intensification in and near the village center."

Those who were neutral or weren't sure reflected the comments above.

Wakefield – Near the centre

A total of 310 people answered this question including:

- 17 people strongly agreed (5%) and 80 people agreed (26%) – total of 31% agreed
- 59 people disagreed (19%) and 13 people strongly disagreed (4%) – total of 23% disagreed
- 85 responded with 'neutral' (27%)
- 48 responded with 'Don't know' (15%)
- 8 responded with 'N/A' (3%)

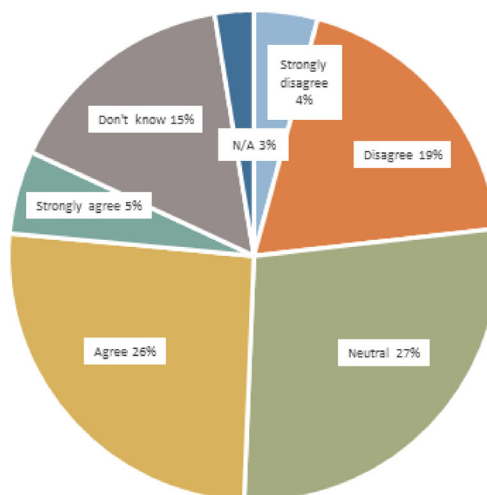


Figure 23 Responses to Question 19 - Intensification in Wakefield

A total of 125 people provided comments to this question.

Approximately 33 people who agreed or strongly agreed provided comments that included:

- Support for increase of homes in Wakefield, particularly through intensification of the centre and providing affordable options (7 submitters);



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- Support for providing more amenities and commercial activities in Wakefield too to support the existing residents in the area with employment as well as attracting visitors (7 submitters);
- Agreed but noted more infrastructure is required to support growth (4 submitters).

“It would be wonderful to see more opportunity for extra amenities/services in Wakefield as well - to create more jobs for those who prefer to spend time nearer to home (and less time travelling by car), but also to encourage visitors to enjoy the area (much like the experiences now provided at Mapua). This could be cafes/a boutique wine bar/boutique retail/fitness services/gym space/accommodations etc.”

Approximately 61 submitters who disagreed or strongly disagreed provided comments that included:

- Concern about the distance of Wakefield from employment and the impact this will have on commuter traffic into Richmond. Suggestion to intensify areas like Richmond first before providing growth in Wakefield (33 submitters);
 - This included approximately 21 submitters who used the NelsonTasman2050 submission template which reflected the above concern;
- Concern that intensification will impact on the local rural character of Wakefield (5 submitters);
- Concern about loss highly productive land and countryside areas in Wakefield (3 submitters).

“Do we need to build more commuter suburbs?. If there was enough industry in the area to support increased housing, that would help or different, smaller, more intense types of housing around the suburb centre, to make it more of a community.”

Those who were neutral or weren't sure reflected the comments above.

Motueka – Greenfield and brownfield intensification

A total of 308 people answered this question including:

- 12 people strongly agreed (4%) and 66 people agreed (21%) – total of 25% agreed
- 34 people disagreed (11%) and 23 people strongly disagreed (7%) – total of 18% disagreed
- 122 responded with 'neutral' (40%)
- 40 responded with 'Don't know' (15%)
- 11 responded with 'N/A' (4%)

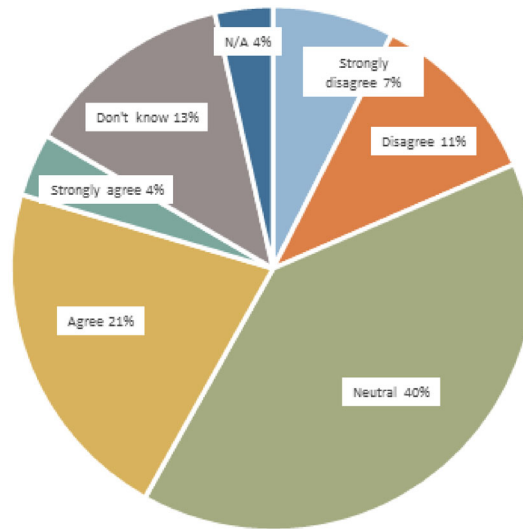


Figure 24 Responses to Question 20 - Intensification in Motueka

A total of 155 people provided comments to this question.

Approximately 41 people who agreed or strongly agreed provided comments, including:

- Support for more intensification to be prioritized, but only in brownfield areas rather than greenfield areas (13 submitters). Suggestion to use existing carpark areas in Motueka for apartment buildings;
- Support to allow for more growth that would provide living and working opportunities in Motueka and reduce the need to travel into Richmond or Nelson (8 submitters).

"To make public and active transport possible for work, school and shopping, intensification is the best option. However, Motueka is surrounded by highly productive land and also has potential for flooding so any development will have to protect productivity and be resilient to hazards."

Approximately 38 people who disagreed or strongly disagreed provided comments including:

- Support for more intensification that what is proposed and limiting this to brownfield areas rather than greenfield areas (11 submitters);
- Concern about the loss of highly productive land that may result from greenfield intensification (7 submitters);
- Concern about the proposal for greenfield intensification and the detrimental impacts on the increased GHG emissions (4 submitters);
- Concern about the impact of sea-level-rise on Motueka and new development (4 submitters).

"I don't agree with greenfield intensification, unless it is close to the centre and used to support the relocation of residential and commercial buildings that are in danger from rising sea level and storm waters. Motueka has a lot of employment needs and needs good quality homes to support that."

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"I think Motueka needs more radical thought. It is a question of what can be done in the face of sea level change. Is there going to be protection or retreat? Where could Motueka grow but still retain a sense of compact rural community."

Those who were neutral or weren't sure reflected the comments above.

Mapua – intensifying rural residential area to residential densities

A total of 314 people answered this question including:

- 15 people strongly agreed (5%) and 52 people agreed (17%) – total of 22% agreed
- 40 people disagreed (13%) and 92 people strongly disagreed (29%) – total of 42% disagreed
- 77 responded with 'neutral' (25%)
- 33 responded with 'Don't know' (11%)
- 5 responded with 'N/A' (2%)

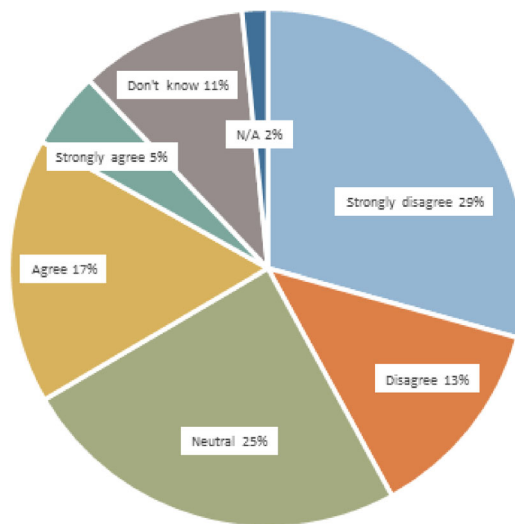


Figure 25 Responses to Question 21 - Intensification in Mapua

A total of 162 people provided comments on this question.

Approximately 25 people who agreed or strongly agreed provided comments that included:

- Support for intensification given there is existing infrastructure and services in place (4 submitters);
- Support given it will increase vibrancy in the town as long as the existing 'seaside village' feel is not lost (4 submitters).

"As new residents i would be delighted to see more residents. I think the balance between maintaining the serenity and allowing for more people to enjoy it about right - another 700 houses"



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isn't going to turn it into Auckland, i think it will be easily absorbed over the time frame and add to the energy and vibrancy."

"As long as the 'character' of Mapua is not dramatically altered. It is a 'seaside village', however SOME 3 level development would not be out of place."

Approximately 109 people who disagreed or strongly disagreed provided comments that included:

- Concern that there are already not enough jobs in the area and growth will exacerbate car dependence and greenhouse gas emissions with more people travelling into Richmond and Nelson (20 submissions);
- Concern that the type of growth shouldn't be labelled as intensification as it involves converting rural residential land into standard low-density housing, rather than intensifying existing urban areas (9 submissions);
- Approximately 27 submitters used the NelsonTasman2050 submission template to respond to this question, raising similar issues to the above. There was also concern that the label of 'intensification' is particularly misleading for Mapua given the nature of the areas proposed and that they will not provide for the smaller housing typologies that there is demand for. It is intended that smaller housing typologies are provided for in these areas rather than only lower density, standalone homes.
- Concern about the loss of character and the unique, coastal village qualities of Mapua that have already resulted from recent developments and concern that this will increase (19 submitters)

"Mapua is a small coastal village chosen by residents who want to experience a small village community, NOT a suburb! It is successful as a highly functional community because residents donate a huge number of volunteer hours to ensure that it is a great community. The recent influx of "commuters" has already degraded the community spirit . There is huge opposition to gobbling up rural land for suburban development."

"Change in Mapua has happened rapidly. More change and population undermines the unique quality of Mapua as a village. The school is oversubscribed, there is often no parking at the local shop and the congestion on the roads to Richmond is noticeable. Growing Mapua's population will only add to the congestion. Adding more shops , supermarkets etc. to this area will certainly undermine Mapua's unique village quality."

Those who were neutral or weren't sure reflected the above comments.

3.6 Questions 22 – 28 – Greenfield Growth

3.6.1 Do you agree with the location and scale of the proposed greenfield housing areas?

Figure 19 shows a summary of perspectives for Questions 22 to 28. Key themes and responses to questions 22 to 28 are detailed below and in general included:

- In general, there was less support for the location and scale of greenfield growth compared to intensification growth. A significant proportion of submitters are concerned about the impacts that the proposed level of greenfield growth will have on:
 - Loss of rural landscapes and open spaces for public use;
 - Increased greenhouse gas emissions from vehicles due to lack of employment in greenfield areas;
 - Loss of environmental values and increases in impervious areas; and
 - Generally increased impacts from climate change because of the above points.
- A large proportion of submitters do not agree with greenfield growth proposed around Nelson and Mapua
 - In Nelson, this significantly reflects the opposition to development in the Maitai Valley, including Kaka Valley, Bayview, Mahitahi and Orchard Flats. Approximately 92 submitters who answered this question expressed concern and opposition to the development in order to protect its recreational and natural values.
 - In Mapua, submissions generally reflected the above points relating to opposition to greenfield growth in general.

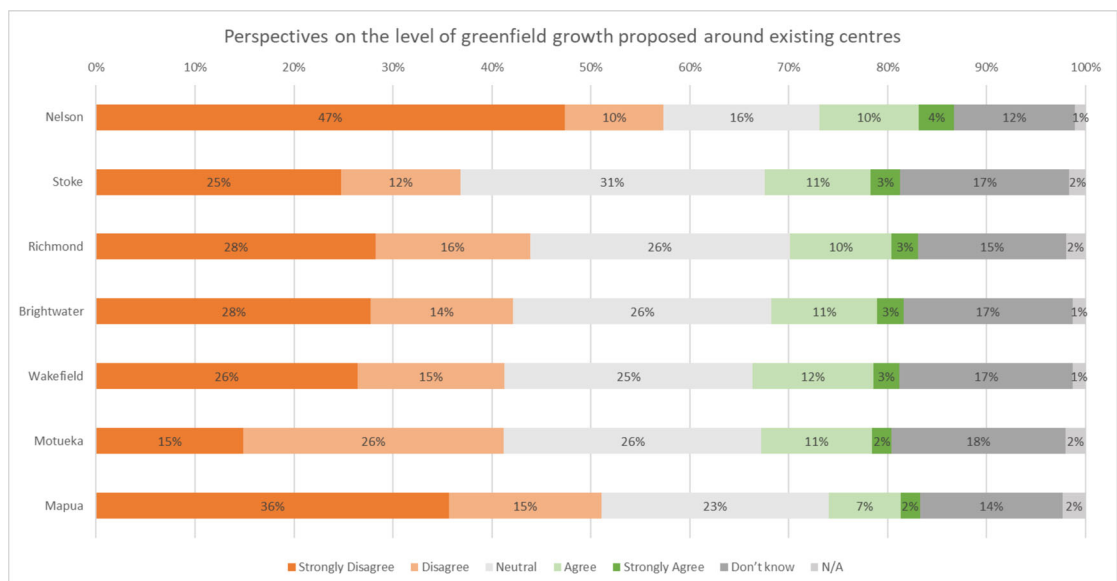


Figure 26 Responses to Questions 22 to 28 showing perspectives on the level of greenfield growth proposed around existing centres

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Nelson

A total of 361 submitters responded to this question including:

- 13 people strongly agreed (4%) and 36 people agreed (10%) – total of 14% agreed
- 36 people disagreed (10%) and 171 people strongly disagreed (47%) – total of 57% disagreed
- 57 responded with 'neutral' (16%)
- 44 responded with 'Don't know' (12%)
- 4 responded with 'N/A' (1%)

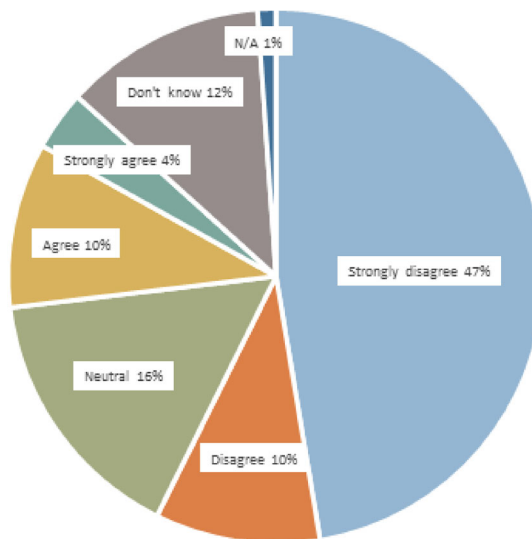


Figure 27 Responses to Question 22 - Nelson greenfield growth

A total of 261 people provided comments on this question.

Approximately 21 people who agreed or strongly agreed provided comments including:

- Support given that the greenfield areas are close to the existing urban area and have existing infrastructure, services and employment (5 submitters);
- General opposition to greenfield growth and support for intensification (5 submitters).

"Simply because intensification will not provide sufficient dwellings for an increasing population, and because the areas selected are not 'highly productive land'."

"Nelson needs to take a greater share of responsibility for regional growth and ensure costs for development of the built environment including supply of water from the Waimea Dam."

Approximately 183 people who disagreed or strongly disagreed provided comments including:

- Opposition of development in the Maitai Valley because of its recreational and natural value (92 submitters – 25% of all submissions)

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- General support to protect greenfield areas from development and prioritize intensification instead (35 submitters);
- Concern about the loss of open, natural rural landscapes that surround Nelson and contribute to its amenity and character (33 submitters);
- Concern about the increase in GHG emissions due to increased vehicle travel and lack of public transport provision (8 submitters)

“Changing the rural landscape in the Maitai valley, Kaka valley and Orchard Flats will deprive both residents and visitors to Nelson of a special recreational area, used and appreciated both historically and currently by all. I object to the proposed housing development, and wish it to be left unchanged, as it is, for future generations to enjoy.”

“One of the special qualities of Nelson is that you can actually walk to outside the city and enjoy nature. This is beneficial to the physical and mental health of the population and should be preserved. We want to enjoy the country, fields, rivers and trees, we do not want acres and acres of more houses and the destruction of nature.”

“Additional housing out of town will increase commuter costs, congestion and greenhouse gas emission.”

Those who were neutral or weren't sure generally reflected the comments above.

Stoke

A total of 299 submitters responded to this question including:

- 9 people strongly agreed (3%) and 32 people agreed (11%) – total of 14% agreed
- 36 people disagreed (12%) and 74 people strongly disagreed (25%) – total of 37% disagreed
- 92 responded with 'neutral' (31%)
- 51 responded with 'Don't know' (17%)
- 5 responded with 'N/A' (2%)

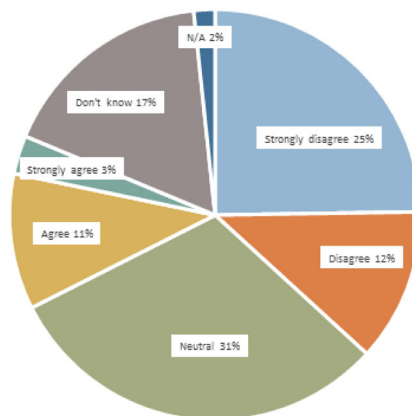


Figure 28 Responses to Question 23 - greenfield growth in Stoke

A total of 126 people provided comments for this question.

Approximately 16 people provided comments who agreed or strongly agreed and these included:

- General support for intensification of existing urban areas rather than greenfield growth (12 submitters)
- Support for greenfield growth in Stoke because it is close to employment opportunities, flat land and existing infrastructure (4 submitters)

A total of 95 people provided comments who disagreed or strongly disagreed and these included:

- Comments expressed a similar view to above that intensification of existing areas should be favoured and expansion into greenfield areas should be limited. Key reasons for this included protecting the rural landscapes, reducing greenhouse gas emissions and generally providing growth in the existing centre (71 submitters)

Richmond

A total of 301 submitters responded to this question including:

- 8 people strongly agreed (3%) and 31 people agreed (10%) – total of 13% agreed
- 47 people disagreed (16%) and 85 people strongly disagreed (28%) – total of 44% disagreed
- 79 responded with 'neutral' (26%)
- 45 responded with 'Don't know' (15%)
- 6 responded with 'N/A' (2%)

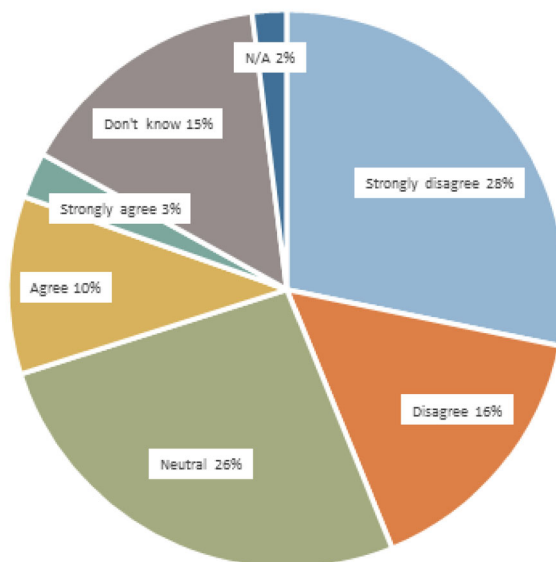


Figure 29 Responses to Question 24 - Greenfield growth in Richmond

A total of 80 people provided comments to this question.

Approximately 12 people who agreed or strongly agreed provided comments including:

- There is supporting infrastructure, services and jobs in Richmond and therefore a sensible place for growth that can easily access centres (6 submitters);
- Support as long as it does not extend into highly productive land of the Waimea Plains (3 submitters).

Approximately 39 people who disagreed or strongly disagreed provided comments including:

- Support to favor intensification over greenfield growth, largely because of the resulting increase in GHG emissions from vehicle travel and impact on the surrounding landscapes (20 submitters)
- Concern about the loss of productive land that may result from expansion into greenfield areas around Richmond (17 submitters)

Comments from those who responded 'don't know', 'neutral' or 'N/A' generally reflected the above.

Brightwater

A total of 299 submitters responded to this question including:

- 8 people strongly agreed (3%) and 32 people agreed (11%) – total of 14% agreed
- 43 people disagreed (14%) and 83 people strongly disagreed (28%) – total of 42% disagreed
- 78 responded with 'neutral' (26%)
- 51 responded with 'Don't know' (17%)
- 4 responded with 'N/A' (1%)

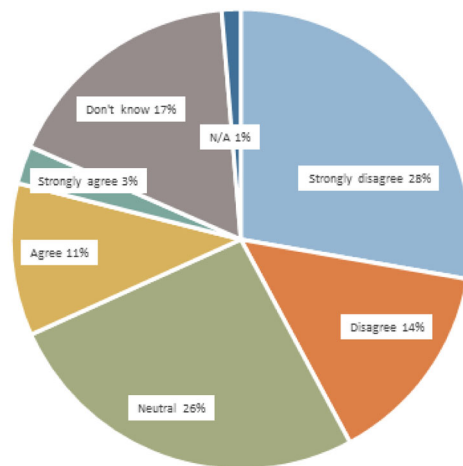


Figure 30 Responses to Question 25 - Greenfield growth in Brightwater



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A total of 133 people provided comments.

Approximately 17 people who agreed or strongly agreed provided comments including:

- Support given the proximity to Richmond and the existing services, infrastructure and community that are already located in Brightwater (5 submitters)
- Support for the greenfield sites as they have lower productive values and so are appropriate for residential development (3 submitters);
- Site specific comments for T-102, that it is supported and should be extended slightly (3 submitters).

Approximately 93 people who disagreed or strongly disagreed provided comments including:

- General opposition to any type of greenfield development because of the resulting increase in GHG emissions given the lack of employment options in Brightwater and the loss of rural landscapes. Support to favour intensification of existing centres instead (66 submitters).

“Unnecessary development at the cost of local amenity , there are better options with intensification, increasing occupancy levels and change of use of current housing stock.”

Comments from those who responded ‘don’t know’, ‘neutral’ or ‘N/A’ generally reflected the above.

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Wakefield

A total of 303 submitters responded to this question including:

- 8 people strongly agreed (3%) and 37 people agreed (12%) – total of 15% agreed
- 45 people disagreed (15%) and 80 people strongly disagreed (26%) – total of 41% disagreed
- 76 responded with 'neutral' (25%)
- 53 responded with 'Don't know' (17%)
- 4 responded with 'N/A' (1%)

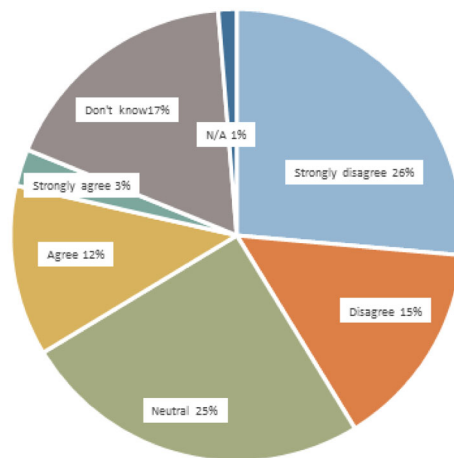


Figure 31 Responses to Question 26 - Greenfield growth in Wakefield

A total of 132 people provided comments.

Approximately 25 people who agreed or strongly agreed provided comments including:

- General support for growth in Wakefield so long as there are services and amenities provided.

Approximately 88 people who disagreed or strongly disagreed provided comments including:

- General opposition to any type of greenfield development and support to favour intensification of existing centres instead given the lack of jobs in the area and resultant increase in greenhouse gas emissions from commuters and in order to protect highly productive land (73 submissions).

Comments from those who responded 'don't know', 'neutral' or 'N/A' generally reflected the above.

Motueka

A total of 296 submitters responded to this question including:

- 6 people strongly agreed (2%) and 33 people agreed (11%) – total of 13% agreed

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- 78 people disagreed (26%) and 44 people strongly disagreed (15%) – total of 41% disagreed
- 77 responded with 'neutral' (26%)
- 52 responded with 'Don't know' (18%)
- 6 responded with 'N/A' (2%)

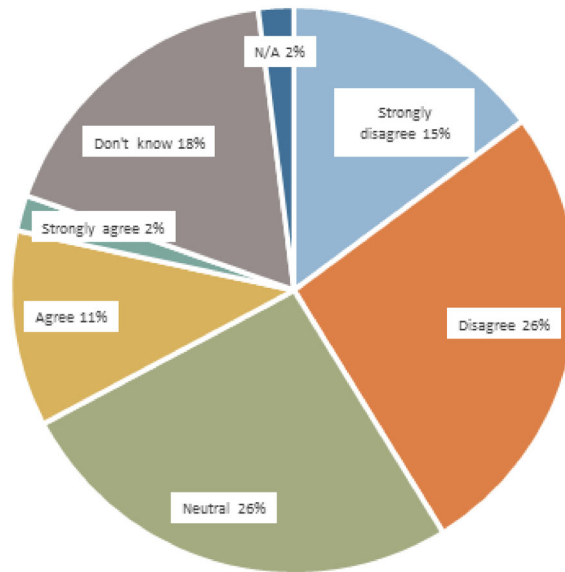


Figure 32 Responses to Question 26 - Greenfield growth in Motueka

A total of 135 people provided comments.

A total of 19 people who agreed or strongly agreed provided comments, including:

- There is demand and need for increased development in Motueka and it is a suitable location given it is an existing centre (6 submitters)
- The areas proposed for greenfield expansion are not highly productive and therefore OK to be developed in (3 submitters)

A total of 89 people who disagreed or strongly disagreed provided comments, including:

- General opposition to any type of greenfield development and support to favour intensification of existing centres instead (28 submitters). Reasons for this largely related to reducing greenhouse gas emissions and protecting the surrounding environment from development;
- Concerned about the distance of Motueka from Nelson and the increased traffic and GHG emissions that this will create (8 submitters).

Comments from those who responded 'don't know', 'neutral' or 'N/A' generally reflected the above

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Mapua

A total of 305 submitters responded to this question including:

- 6 people strongly agreed (2%) and 22 people agreed (7%) – total of 9% agreed
- 47 people disagreed (15%) and 109 people strongly disagreed (36%) – total of 51% disagreed
- 70 responded with 'neutral' (23%)
- 44 responded with 'Don't know' (14%)
- 7 responded with 'N/A' (2%)

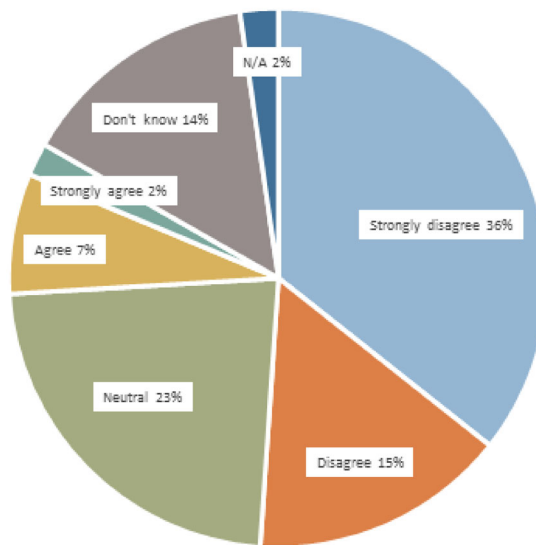


Figure 33 Responses to Question 28 - Greenfield growth in Mapua

A total of 151 people provided comments.

A total of 13 people who agreed or strongly agreed provided comments including:

- Rural residential land is underutilized and of low productive value (3 submitters);
- Growth in Mapua would support the existing community (3 submitters).

"Small towns are happy towns with relaxed people, a sense of security for parents for their children to walk bike to school to get to work easy access to parks, community gardens for a cohesive thriving community."

A total of 111 people who disagreed provided comments including:

- General concern about any type of greenfield growth due to the resulting increase in vehicle travel, associated GHG emissions, loss of productive land and the need to focus on intensifying



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existing centres instead (58 submitters – including 20 submitters that followed the NelsonTasman2050 submission template);

- Concern about the distance of Mapua from existing centres and employment areas due to the resultant increases in traffic and GHG emissions (12 submitters).
- Concern about loss of the unique village and rural character of Mapua (11 submitters)

“Mapua is a lovely village. I think there has been enough residential expansion on green fields already. Let’s avoid becoming a top of the south urban sprawl, and retain some character filled areas like this one, for recreation and enjoyment, otherwise our region will be totally without charm and individualism.”

Comments from those who responded ‘don’t know’, ‘neutral’ or ‘N/A’ generally reflected the above

3.7 Question 32 – Business Growth

3.7.1 Do you agree with the locations shown for business growth (both commercial and light industrial)?

A total of 295 submitters responded to this question including:

- 3 people strongly agreed (1%) and 49 people agreed (16%) – total of 17% agreed
- 52 people disagreed (18%) and 14 people strongly disagreed (5%) – total of 23% disagreed
- 100 responded with 'neutral' (34%)
- 75 responded with 'Don't know' (25%)
- 2 responded with 'N/A' (1%)

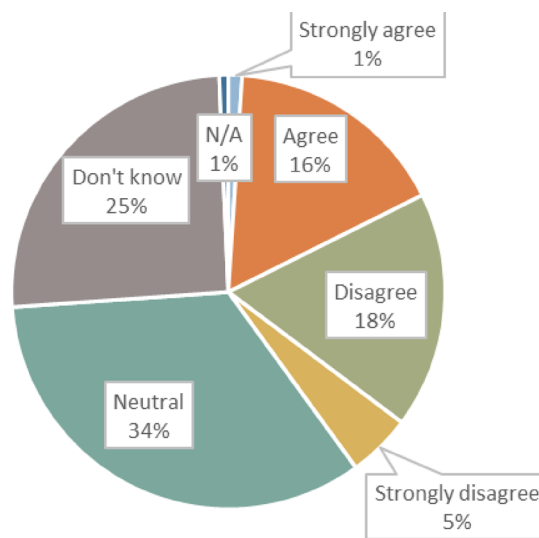


Figure 34 Responses to Question 32 - Business growth

A total of 115 people provided comments on why they agreed or disagreed.

Those who agreed and disagreed generally had the same comments including:

- Support for prioritizing business growth in existing areas through intensification, to ensure that jobs are close to where people live (28 submitters);
 - 32 submitters followed the NelsonTasman2050 submission template and raised concern about the proposal for business growth in between Richmond and Hope along SH6 and the potential loss of rural character in this area.

"We should be providing more opportunities for businesses in areas, including rural towns, that have a known employment shortage - not just roll out more light industrial along SH6 in Hope.... We need to protect this productive landscape and strengthen Hope as a village (separate from Richmond)."



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- Concern about business growth expanding onto highly productive land and greenfield areas (6 submitters);
- Site specific comments (6 submitters).

3.7.2 Let us know if there are any additional areas that should be included for business growth or if there are any proposed areas that you consider are more or less suitable.

A total of 97 people provided comments on this question. Key comments included:

- Generally focusing growth in areas where there is an employment shortage and business demand, particularly in rural areas (39 submitters including 30 that followed the NelsonTasman2050 submission template);
- Providing for intensification of business land alongside housing to reduce dependence on vehicle travel (11 submitters);
- Six submitters provided site specific suggestions for business growth.

3.8 Questions 34 to 38 – Rural Towns

3.8.1 Do you agree with the proposed residential and business growth in the rural towns?

Figure 35 shows a summary of perspectives for Questions 34 to 38. Key themes and responses are detailed below for each question and in general included:

- There was less certainty in perspectives for the rural towns with the majority of people answering 'neutral' or 'don't know', reflecting the smaller proportion of submitters from these areas.
- Of those who did answer, there were slightly more submitters who disagreed with the proposed growth compared to those who agreed.
 - The key reasons for this were site specific views as detailed below and the general perspective to intensify rural towns proportionately to the amount of employment in the area.

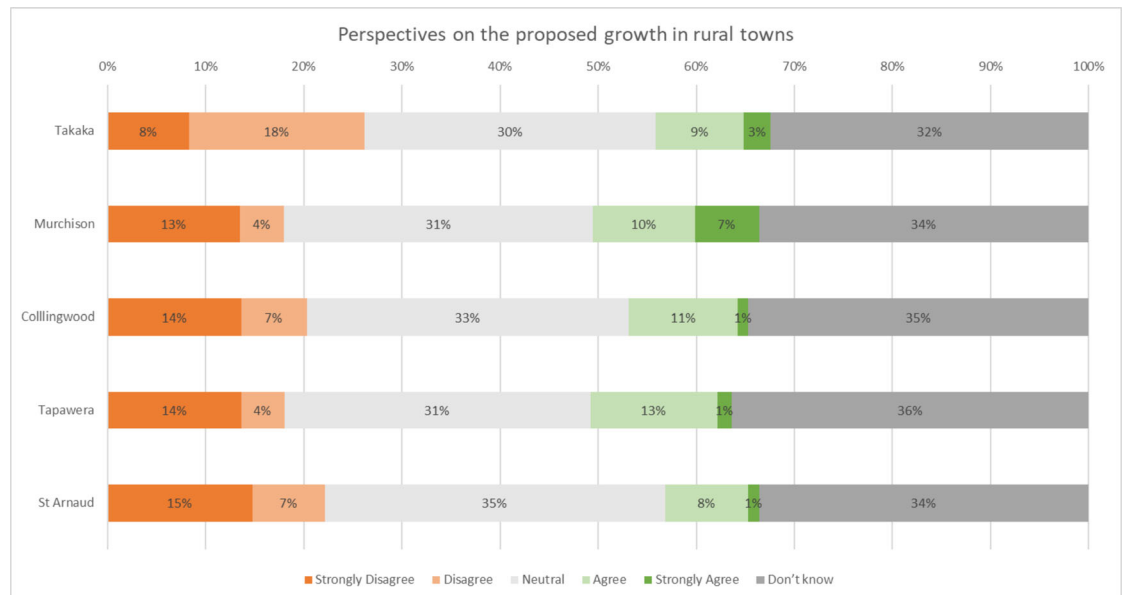


Figure 35 Responses to Questions 34 - 38 showing perspectives on proposed growth in rural towns

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Takaka

A total of 290 submitters responded to this question including:

- 8 people strongly agreed (3%) and 26 people agreed (9%) – total of 12% agreed
- 52 people disagreed (18%) and 24 people strongly disagreed (8%) – total of 26% disagreed
- 86 responded with 'neutral' (30%)
- 94 responded with 'Don't know' (32%)

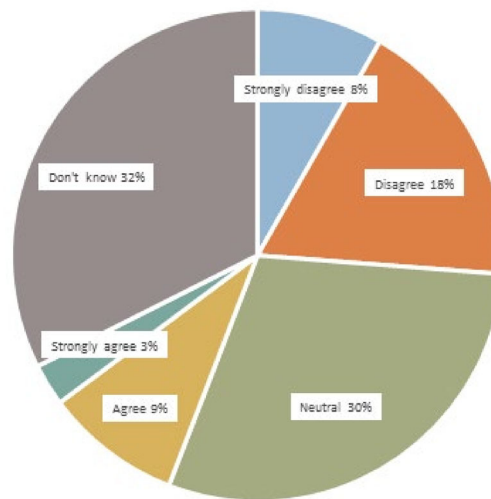


Figure 36 Responses to Question 34 - Takaka

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Murchison

A total of 289 submitters responded to this question including:

- 19 people strongly agreed (7%) and 30 people agreed (10%) – total of 17% agreed
- 13 people disagreed (5%) and 39 people strongly disagreed (13%) – total of 18% disagreed
- 91 responded with 'neutral' (31%)
- 97 responded with 'Don't know' (34%)

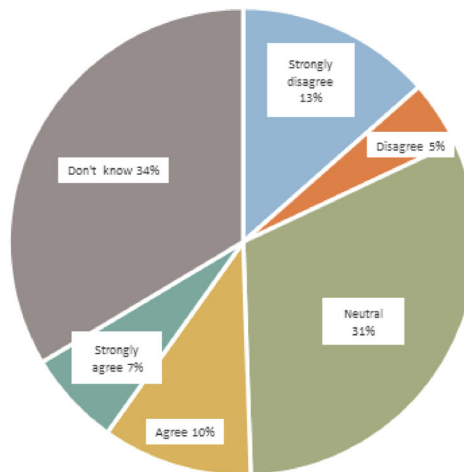


Figure 37 Responses to Question 35 - Murchison

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Collingwood

A total of 271 submitters responded to this question including:

- 3 people strongly agreed (1%) and 30 people agreed (11%) – total of 12% agreed
- 18 people disagreed (6%) and 37 people strongly disagreed (14%) – total of 20% disagreed
- 89 responded with 'neutral' (33%)
- 94 responded with 'Don't know' (35%)

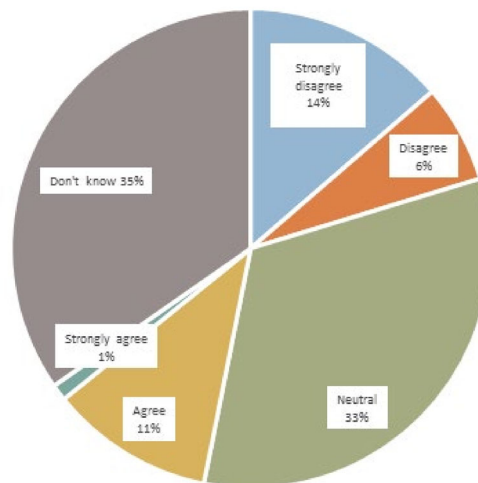


Figure 38 Responses to Question 36 - Collingwood

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Tapawera

A total of 272 submitters responded to this question including:

- 4 people strongly agreed (2%) and 35 people agreed (15%) – total of 15% agreed
- 12 people disagreed (4%) and 37 people strongly disagreed (14%) – total of 18% disagreed
- 85 responded with 'neutral' (31%)
- 99 responded with 'Don't know' (36%)

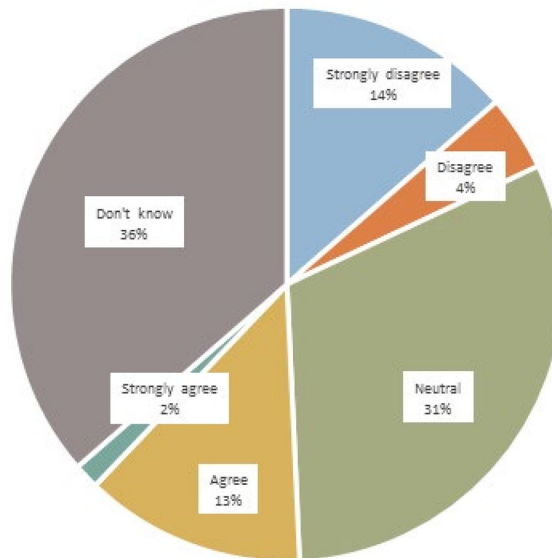


Figure 39 Responses to Question 37 - Tapawera

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St Arnaud

A total of 271 submitters responded to this question including:

- 3 people strongly agreed (%) and 23 people agreed (%) – total of % agreed
- 20 people disagreed (%) and 40 people strongly disagreed (%) – total of % disagreed
- 94 responded with 'neutral' (%)
- 91 responded with 'Don't know' (%)

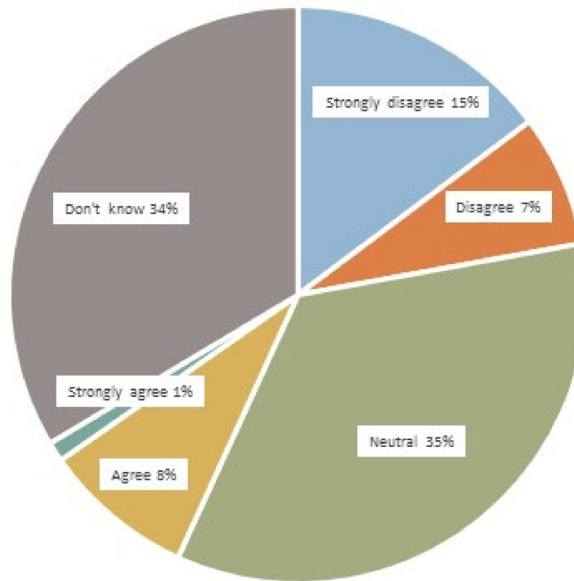


Figure 40 Responses to Question 38 - St Arnaud



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Let us know which sites you think are more appropriate for growth or not in each rural town.
Any other comments on the growth needs for these towns

A total of 151 people answered this question. Key comments included:

- General support for intensification in existing rural towns, as long as housing is balanced with employment to ensure people can live where they work (48 submitters including 30 submitters that followed the NelsonTasman2050 format)
- Concern that there is not a specific section for Golden Bay given the increasing demand for housing in this area

Key comments on specific sites included:

Takaka

- 10 submitters opposed site T-163 due to its location within rural lifestyle area and proposed intensification that will change the local rural character
- Support for intensification of existing areas of Takaka rather than growth in sites outside of the main town area

Collingwood

- No specific comments

Tapawera

- Concern that population growth is underestimated and need more housing particularly low-cost and elderly

Murchison

- General support for more residential sites, particularly rural residential (4 submitters)
- Concern about the light industrial site T-148 given its location at the entrance to the town

St Arnaud

- Need for more business growth sites



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3.9 Question 40 – Other comments

3.9.1 Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?

A total of 379 people answered this question. The comments received to this question generally reflected the key issues raised throughout the questionnaire. In particular these included:

- Concern that the FDS does not focus on protecting the environment and adapting to the impacts of climate change enough (45 submitters);
- Concern that the FDS does not prioritize intensification enough and limit greenfield growth (45 submitters);
- Opposition to intensification given the impacts on sunlight, views and quality of life (33 submitters)
 - 19 submitters expressed opposition to intensification of Tahunanui with an additional 5 concerned about in-fill proposed in the Tahuna Slump area;
 - 7 submitters expressed opposition to intensification of The Wood.
- Opposition to the Maitai Valley development including Orchard Flats (31 submitters);
- 29 submitters used the NelsonTasman2050 submission template or endorsed this submission. Similarly, to the key themes above, this submission related to limiting urban sprawl through greenfield development, providing for smaller and more affordable housing typologies, planning for quality environments and overall, fundamentally changing the approach to growth in order to respond to the impacts of climate change;
- Submitters expressed the need for development areas to include planning for social amenities, services and open spaces and ensure that development does not destroy the existing community values that people value in Nelson and Tasman (15 submitters);
- Concern about the proposal for growth in Tasman Village based on the perceived impacts on traffic, rural character of the area and infrastructure capacity (18 submitters);
 - 5 submitters expressed support for the development (landowners/developers);
- Concern that there is not enough focus on the public transport network that is required to support development (12 submitters) – this theme carried across a large number of submissions in relation to the support for increased intensification and reduction of greenfield development;
- Concern that the growth rates are too high (11 submitters);
- Difficulties with the consultation process, particularly timeframes, language or structure of the questioning (7 submitters);
- There were 42 site specific comments either proposing new sites, amendments to site boundaries or support/opposition to individual sites;
 - 10 submitters raised concern about site T-163 in Takaka given the impacts on the environment and rural character.

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SCP Analysis Report

Prepared by B&A for the Nelson Tasman Future Development Strategy

Attachment for Deliberations Hearing Report

23 May 2022

B&A
Urban & Environmental

Cover Page & Contents

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Draft Nelson Tasman Future Development Strategy 2022-2052 – Analysis Report for Deliberations



Appendices

- Appendix 1: Review of Selected Submissions (Kirdan Lees, Sense Partners)
- Appendix 2: MCA and revised residential capacity calculations

1.0 Introduction and Scope

1.1 Introduction

The purpose of this report is to analyse the key issues arising from submissions on the draft Nelson Tasman Future Development Strategy 2022-2052 (**the FDS**). We have organised the analysis as follows:

- Base assumptions and methodology used to inform the development of the draft FDS, including the growth projections, approach to calculating capacity and the multi-criteria analysis framework;
- The FDS Outcomes used to guide the development and implementation of the draft FDS;
- The growth strategy of the draft FDS, including the greenfield and brownfield capacity assumptions of the core proposal;
- The implementation section of the draft FDS, including provision for infrastructure and the staging of development areas.

We have set out the analysis in this way to address the distinct components of the draft FDS and the assumptions that inform it. Key issues arising through submissions on the draft FDS will be discussed in this context.

In addressing these issues, we briefly summarise the submissions relating to these matters, set out the relevant statutory framework (and where relevant strategic framework), followed by a planning analysis and response for consideration by the FDS Subcommittee. Throughout the report we refer to the following additional information:

- Memo of Sense Partners responding to economic matters raised by submitters (see Appendix 1); and
- MCA evaluation of new sites proposed and revised capacity calculations (see Appendix 2).

1.2 Recap of role of the FDS

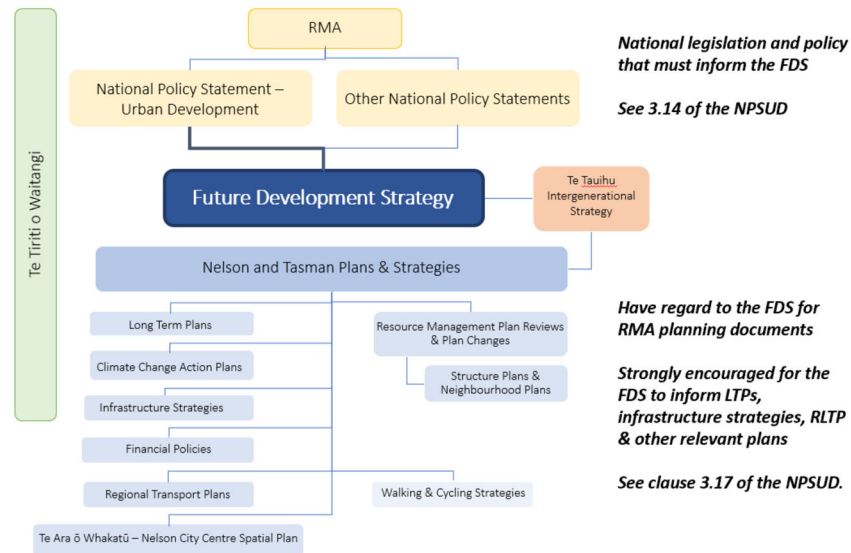
The purpose and role of the FDS is set out in Section 11 of the draft FDS. Below are the relevant provisions from the NPSUD that set out the statutory effect of the FDS for other Council documents:

Every tier 1 and tier 2 local authority:

- a) **must have regard to the relevant FDS when preparing or changing RMA planning documents;** and
- b) is **strongly encouraged to use the relevant FDS to inform:**
 - (i) long-term plans, and particularly infrastructure strategies; and
 - (ii) regional land transport plans prepared by a local authority under Part 2 of the Land Transport Management Act 2003; and (iii) any other relevant strategies and plans.

The Councils are therefore not required to give effect to the FDS but it must consider it. The weight that weight that would be afforded to the FDS would depend on a range of factors, including the

specifics of a development and the relevance of the FDS to it. This is illustrated in the diagram below.



Base Assumptions & Methodology

2.0 Growth Projections

2.1 Issue Statement

Various submissions have raised issues with the growth projections used to inform the draft FDS, these include:

- (a) Promoting no growth, or very limited growth, over the next 30 years to retain current community values;
- (b) Applying the medium rather than the high growth scenario for the draft FDS;
- (c) Criticism of the methodology for developing the projections, including comments around the linear extrapolation of historic growth trends;
- (d) Concern about the strategy being focussed on ‘meeting demand’ (particularly as noted in Outcome 5) and this encouraging a growth economy that relies heavily on market forces. Submitters suggested that the focus should instead be on managing demand within the carrying capacity of the land, particularly as this relates to protecting the environment and managing impacts of climate change; and
- (e) General concern that growth is the core driver of the FDS rather than reducing emissions or promoting quality urban environments.

Approximately 34 submitters raised concerns about the above issues in response to Question 40. This included both Kainga Ora and Nelson Tasman 2050 who provided detailed responses to these issues.

2.2 Statutory Requirements

The National Policy Statement – Urban Development (“NPSUD”) sets out the requirements for the FDS. Clause 3.13 sets out the purpose of an FDS as follows (emphasis added):

- (a) to promote long-term strategic planning by setting out how a local authority intends to:
 - (i) achieve well-functioning urban environments in its existing and future urban areas; and
 - (ii) **provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand;** and
- (b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.

This is consistent with Policy 2 of the NPSUD, which requires the Councils to at all times provide at least sufficient development capacity to meet expected demand.

The requirement for the Council to prepare a Housing and Business Capacity Assessment (“HBA”) directly links to the above highlighted requirement and is intended to inform the FDS (see clause 3.20 of the NPSUD). The HBA is required to set out a range of projections of demand for housing and business over the short, medium and long term and identify which are most likely over that timeframe.

The Councils, through their FDS, are able to signal greater capacity to meet the demand set out in the HBA. The NPSUD does not provide further guidance on the circumstances in which this should occur, however, the section 32 report informing the NPSUD does provide some guidance by linking the concepts of sufficient development capacity with improved housing affordability and the competitive operation of land and development markets (Objective 2)¹. Further commentary on this can be found in the Sense Partners memo at **Appendix 1**.

2.3 Analysis & Recommendations

2.3.1 Methodology for Medium and High Growth Scenarios

The demand forecasts in the Nelson and Tasman HBAs were developed for both Councils’ Long Term Plans 2021-2031, with input from experienced demographers and economists. They are based on demographic assumptions about mortality, fertility and net migration and are not a simple extrapolation of past growth trends². The projections also informed both Councils’ HBAs.

The HBAs were also peer reviewed by Principal Economics for the Ministry for the Environment, who advised that “overall the HBA provides a comprehensive assessment and meets the requirements of the NPS-UD 2020. The HBA provides an appropriate structure, with useful information on demand and supply. The HBA’s capacity assessment is consistent with the NPS-UD guidelines”.

¹ https://environment.govt.nz/assets/Publications/Files/NPS_UD_s32_evaluation_report.pdf

² See explanation on page 8 of the Sense Partners memo at Appendix 1.

In our opinion, and based on the economic advice of Sense Partners and Principal Economics, the demand forecasting undertaken for the HBAs provides a sound basis for the FDS. We note that this matter has not been addressed by the economic experts for Kāinga Ora (Phil Osborne) or Nelson Tasman 2050 (Fraser Colgrave).

The demand forecasts in the HBAs were the starting point for the FDS and are referred to as the 'medium growth scenario' in the draft FDS. To 'stress test' this, a high demand scenario was created using the same methodology as that adopted for the HBA, with input from the same demographers and economists who assisted with the HBA. We comment below on the appropriateness of using the high growth scenario for the FDS.

2.3.2 Can the FDS assume no or limited growth?

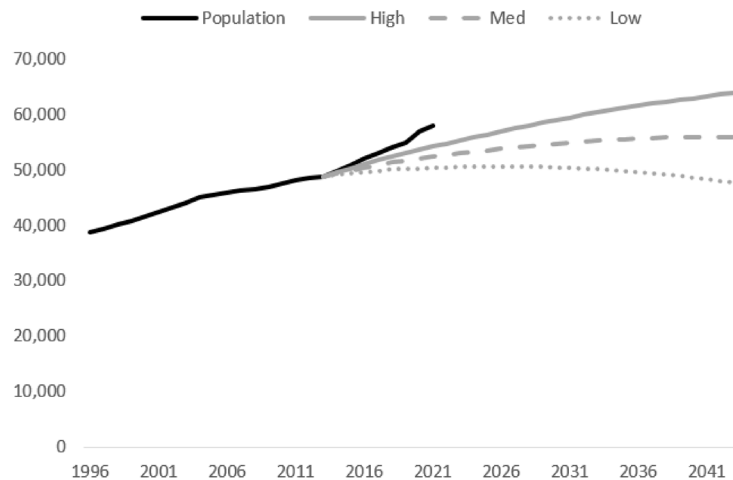
The short answer to this is no. The purpose of the FDS is to show where and how Nelson and Tasman will provide sufficient capacity to meet expected demand. Demand has been assessed through the HBA process as required by the NPSUD, which indicates that growth will occur in response to factors outside of the control of the Councils, including population growth, immigration, internal migration and lowering average household sizes over time. It is the Councils' role to respond and plan for this.

2.3.3 Can the FDS rely on the Medium Growth Scenario?

The Councils can choose to adopt either the medium and/or high growth scenario to inform the FDS. Informed by the analysis undertaken by Sense Partners at Appendix 1, in our view, it is more efficient over the long term to adopt a high growth scenario for the following reasons:

- (a) Recent growth in Tasman has been trending above the medium growth scenario used to inform the 2021 Long Term Plan³ and above the Statistics New Zealand high growth projection. This illustrates that growth in Tasman has been strong and that planning for high growth would be more consistent with recent trends in the local housing and development market.

³ Statistics New Zealand Population Estimates at 30 September 2021 show that Tasman District grew by 900 people in the year to June 2021 despite border closures. Growth of 7,700 people over 10 years was projected in the Tasman District Council Long Term Plan 2021-2031. <https://www.stats.govt.nz/information-releases/national-population-estimates-at-30-september-2021-infoshare-tables>



Graph showing the population forecasts for Tasman increasing above the Statistics NZ high projections (see page 10 of the Sense Partners memo at Appendix 1).

- (b) It provides a greater degree of certainty that the Councils will provide “at least” sufficient development capacity over the next 30 years, as required by the NPSUD. If a medium growth scenario is adopted, there is a risk that the Councils would not provide enough land to meet demand. This would have flow on effects for the competitiveness of the local market and may result in higher land prices and negative impacts on housing affordability.
- (c) The FDS is a strategic document and the greenfield growth areas identified require further planning, rezoning and funding to be in place to enable development. Through its statutory functions, the Councils ultimately manage the release of this land to the market. This allows the Council to coordinate the release of greenfield land with when it is needed. Should demand remain as it is, planning for the high growth scenario gives the Councils and the market choices and flexibility to respond quickly. Having choices is important, given that not all greenfield landowners may wish to develop and/or more detailed structure planning may reveal development constraints not otherwise identified at the strategic level in the FDS. Planning for medium growth would reduce those choices, and introduces a greater risk of ad-hoc or unplanned greenfield development occurring.

On balance, in our view, planning for the high growth scenario, more effectively achieves the objectives of the NPSUD, particularly those relating to providing at least sufficient development capacity and supporting competitive land and development markets. The Councils can ensure that development achieves the objectives for well-functioning urban environments, including supporting a reduction in greenhouse gas emissions by releasing greenfield land for development on a staged basis, supported by structure planning processes that ensure the land is used efficiently.

2.3.4 Recommended changes to the draft FDS

Based on the above analysis, we do not recommend any changes to the draft FDS regarding the growth projections for Nelson and Tasman. Section 7 below details the analysis of submissions related to climate change and emission reductions.

3.0 Approach to Calculating Capacity incl. Uptake Rate

3.1 Issue Statement

A strong theme that emerged in the submissions related to the balance of growth proposed in greenfield expansion areas versus intensifying existing urban areas. A large proportion of submitters expressed a preference that growth through intensification should be more heavily prioritised in the proposal with two issues being the rate and type of intensification anticipated by the proposal. The main points of concern that were raised by submitters included:

- (a) The proposed intensification uptake rates are too slow and conservative to suitably prioritise intensification and increase the pace of change in urban areas; and
- (b) The FDS relies on intensification through incremental backyard, infill developments rather than comprehensively designed development areas.

Kainga Ora were concerned that there are a number of assumptions that have been made in the FDS relating to this issue that have led to outcomes they consider contrary to the objectives to the NPS-UD. In particular, this submitter provided an economic analysis which raised concern that the FDS has underestimated feasible development capacity within the urban area particularly in Nelson City. Following further discussions, Kainga Ora has clarified their position on this matter and confirmed that the 15% uptake rate was at the lower range of potential development (see the attachment at **Appendix 2**). We take this to mean that Kainga Ora considers the uptake rate to be a reasonable, albeit conservative. In our view, it is appropriate to be conservative to ensure the FDS provides at least sufficient development capacity, noting that the Councils can, and should, aim for more to occur.

NelsonTasman2050 had similar concerns to Kainga Ora and specifically challenged the approach that involves incremental intensification. This submitter expressed concern that this type of intensification creates undesirable urban environments and could build opposition in the public to higher density areas. In the hearings process, this submitter expressed that more quality intensification should be integrated into the FDS with more detailed master planning and visioning to provide comprehensively planned intensification areas.

Both the Kainga Ora and NelsonTasman2050 submissions also challenged the underlying assumptions made in the Sense Partners 2020 report on the drivers of intensification and how greenfield land release impacts this.

3.2 Statutory Requirements

As noted above, part of the purpose of the FDS is to set out how the Councils will provide at least sufficient development capacity over 30 years to meet demand. “Sufficient” is specifically defined as being plan-enabled, infrastructure ready, feasible and reasonably expected to be realised.

For the purpose of the 2021 HBAs the Councils used different methodologies for calculating capacity and these are detailed in those reports. The HBAs tell us how much feasible and reasonably expected to be realised capacity is available now under the operative Resource Management Plans. This typically includes stand-alone dwellings, with some limited provision for attached dwellings and more intensive forms of housing in identified areas (e.g. the Richmond

Intensive Development Area). In Nelson, this assumes that only one house would be allowed per 450m² of site area in most residential areas.

The draft FDS looks well beyond the operative Resource Management Plans and signals a significant step change in enabled heights and densities, particularly in Nelson. The purpose of the capacity calculations in the draft FDS is to broadly understand how much capacity the preferred spatial scenario enables at a high level. This included getting a broad understanding of potential plan-enabled capacity with the use of density per hectare assumptions. A broad uptake rate was then applied as a proxy for feasibility. This analysis was deliberately strategic and high level and was not intended to meet the requirements of clause 3.2 or 3.3 of the NPSUD.

We understand that the Councils are currently working towards a combined modelling approach to inform the 2024 HBA. This will assist to provide a consistent approach to demand and capacity modelling that will assist the annual implementation plan and future FDS reviews.

3.3 Analysis and Options

3.3.1 Purpose of Capacity Estimates

The purpose of capacity estimates is to understand at a high level how much development might be realistically delivered by the market if development is enabled to the levels indicated by the draft FDS. This is part of understanding whether the draft FDS will provide sufficient capacity to meet demand over the long term. In our view, it is important that the FDS does not over-estimate the amount of capacity that might be delivered – if that occurred then it is more likely that the FDS would not provide sufficient capacity to meet demand, and therefore not meet the NPSUD requirements. It may also increase the likelihood of ad-hoc or unplanned development occurring in response to market demand, similar to the risks associated with assuming medium growth rather than a high growth scenario, as discussed in the sections above.

The other purposes for the capacity estimates are included in section 7.3 of the Technical Report.

Several submitters considered that the 15% uptake rate was too low and is not aspirational enough⁴. As explained, this is not the purpose of the uptake rate. See section 3.3.2 below for explanation of the role of the uptake rate. **However, the Councils can, and should, aim for a greater level of intensification to occur.** There are a range of methods available to Council to support this and we discuss this further in the report as it relates to implementation of the FDS. Ultimately, if through quarterly monitoring and annual reporting, the number of houses being delivered through intensification is greater than the draft FDS assumes, it is likely there would be reduced need for the Council to prioritise rezoning and infrastructure funding for greenfield locations. This would be an efficient outcome and one that is highly aligned with the FDS outcomes.

Other submitters have criticised the 15% uptake rate as being too low, and have stated that this has resulted in areas like Tahunanui being unnecessarily identified for intensification⁵. This incorrectly conflates two concepts in the draft FDS being:

- Assumed uptake for intensification for the purpose of determining whether the draft FDS provides sufficient capacity;

⁴ Including submission numbers: 31670, 31791, 31806, 31395, 31418, 31421, 31112, 31113, 31216, 31299, 31322, 31736, 31240, 31418 and 31704.

⁵ See Steve Cross submission and hearing presentation.

- What the appropriate heights and densities in the urban area are, commensurate with Policy 5 of the NPSUD.

In other words, even if the uptake rate for intensification was more than 15%, Tahunanui would likely remain suitable for intensification on the basis of its good level of accessibility and relative demand (notwithstanding the presence of natural hazards that will influence intensification outcomes).

3.3.2 Explanation of 2022 Approach and How this Differs from 2019

The approach to calculating capacity for the draft FDS is set out in detail in section 7.3 of the Technical Report. The approach can be summarised as follows:

- Revise and develop the range of housing and business typologies to be applied, this included assuming more efficient use of greenfield areas and introducing a greater range of intensive housing types within the urban area;
- For development in the urban area, 'dwellings per hectare' assumptions were applied to each typology that correlated with the heights and densities shown on the more detailed height and density maps in the draft FDS. The key density assumptions were as follows:
 - High density – up to six storey apartments – 125 dwellings/ha
 - High density – four to six storey apartments – 100 dwellings/ha
 - Medium density – predominantly three storey mixed use – 80 dwellings/ha
 - Medium density – three storey walk ups and apartments – 60 dwellings/ha
 - Standard density – two storey terrace housing/town houses – 33 dwellings/ha
- Use existing masterplans where possible to inform capacity for identified sites;
- Identify all developable parcels of land and exclude sites with reserves, schools, libraries etc as these cannot be developed;
- Exclude other sites unlikely to be redeveloped in 30 years including, sites smaller than 400m², cross lease or unit title sites, and sites with titles issues after 2010;
- Apply the density assumptions to the remaining sites, assuming that the percentage of lots that would take up this opportunity would be 15%.

As explained in Section 7.3.2.2 of the Technical Report, the 15% uptake rate was based on advice from Sense Partners, which benchmarked with Christchurch using the new Medium Density Residential Standards. When adjusting for Nelson conditions, this indicated a range of potential uptake between 4%-10% over the medium term. This was conservatively extrapolated out to 15% over the long term. As noted by Sense Partners, estimates become less assured over the long term, and the method does not capture landowner willingness, and preferences could differ across regions. This is particularly the case in Nelson, where higher density forms of housing are not enabled at scale in the Nelson Resource Management Plan and it is uncertain how the local market will respond when it is. In the face of this uncertainty, in our opinion, it is appropriate to take a conservative approach. The annual implementation plan and the three-yearly review of the FDS provide the opportunity to regularly review these assumptions and adjust the roll-out out of greenfield land in response.

Notwithstanding, Sense Partners has undertaken further analysis and remain of the view that the intensification approach in the draft FDS is appropriate. They have provided a comparison with uptake rates applied in Wellington. In particular, work undertaken by Beca for Wellington City Council in 2021 applied uptake rates ranging from 8% to 29%, with lower uptake rates applying to the most intensive housing types (eight storey apartments). The average of these assumptions is broadly equivalent to 15%. The approach to calculating capacity for the recent Kāpiti Growth Strategy (2022) was also similar to the approach that was adopted for the draft FDS. In that case, broad density assumptions were developed and applied to sites, to which a 10% uptake rate for intensification areas, and a 70% uptake rate for greenfield areas was applied. This is more conservative than the Nelson Tasman approach.

Kāinga Ora and Nelson Tasman 2050 have both raised concerns about the extent of greenfield development proposed, which is related to the rate of intensification assumed in the urban area. During and following the hearing, B&A met with Phil Osborne, the economic advisor for Kāinga Ora. Fraser Colgrave, the economic advisor for Nelson 2050 declined to be involved in these discussions. Through these discussions, it was apparent that Mr Osborne was not familiar with the details contained in the Technical Report. Following further discussions with him, Mr Osborne has confirmed that the approach taken to calculating capacity was appropriate, but maintained concerns that the 15% uptake rate was too conservative. Mr Osborne did not provide an alternative uptake rate or other measures that could be tested by the project team. A record of the outcome from these meetings is included at **Appendix 2** and has been confirmed by all parties.

Further detail on comparisons of the 15% uptake rate with intensification occurring in Richmond and Nelson is included within the attached Capacity Memo at **Appendix 2**.

Submitter 31363 has raised concerns about the differences between the capacity methodology used for the 2019 FDS and how this compares with the approach for the draft FDS. Section 7.3 of the Technical Report details the different approaches and notes that we have built on the methodology developed for the 2019 FDS. The key differences include:

- a) Significant increase in the gross density assumptions both for greenfield and intensification. For example, where the 2019 FDS assumed a gross density of 18 dwellings per hectare for 4-6 storey mixed use areas, the draft FDS assumes 100 dwellings per hectare. The gross density assumptions for the draft FDS are based on more up to date yield analysis undertaken of the Auckland Unitary Plan, and is consistent with the density assumptions used in other recent Future Development Strategies around NZ⁶.
- b) The uptake rates used in the 2019 FDS ranged from 20% to 33%, depending on the typology. This was derived from data showing the percentage of issued building consents that were for more intensive forms of housing. While this tells us about the type of housing developers may deliver, it does not inform us about number of sites that might be developed as a percentage of all sites in the Nelson Tasman urban environment. Understanding the latter is more critical when assessing what uptake rate to apply. In our view, the advice from Sense Partners regarding uptake rates is more reliable and up to date. As stated above, it also accords well with uptake rates assumed for recent planning processes in other cities in New Zealand.

⁶ See Kāpiti Growth Strategy 2022, and the Queenstown Lakes Spatial Plan 2021.

3.3.3 Recommended changes to the draft FDS

Following our review of the submissions, further advice from Sense Partners, and further discussions with Fraser Colgrave and Phil Osborne, we do not recommend further changes to the base capacity assumptions for the draft FDS, including the 15% uptake rate.

We do however recommend the following changes to the draft FDS:

- a) Amend Section 7.1 of the draft FDS to clarify that rate of intensification assumed is not a target, and that the Council should aim for a greater proportion of growth to be catered for within the urban area.
- b) Amend the table in the implementation of the draft FDS to clarify that the quarterly monitoring and annual reporting will involve monitoring of the uptake rate of intensification. This will link with the other recommendations for changes to the implementation section set out in the report below.

4.0 FDS Outcomes

4.1 Issue Statement

For the most part, submitters agreed with the outcomes for the FDS in principle, however there was concern that the proposal for growth would not achieve them. As discussed, submitters raised issues with the level of greenfield expansion in the proposal and expressed that this is in direct opposition to a number of the outcomes, particularly outcomes 1 -3 and 7.

The one outcome that received less support (but was still generally supported) was Outcome 5, which is that 'sufficient residential and business land capacity is provided to meet demand'.

Some submitters found the framing of the questions and outcome statements unclear with a number of submitters thinking the statements were intended to reflect existing conditions rather than the intention for them to be objective statements that the FDS is aiming to achieve over 30 years. Some submitters, including the NelsonTasman2050 submission, suggested that the outcomes should be renamed as 'objectives' to make this clearer.

4.2 Statutory Requirements

There is no statutory requirement for the FDS to contain outcomes, objectives or principles. However, this is a best practice and common planning tool for bringing together the various elements that inform an FDS⁷. The matters that must inform an FDS are set out in Clause 3.14 of the NPSUD and include national policy statements under the RMA. Applying this to Nelson and Tasman, the following are the key national policy statements that have informed the FDS outcomes:

- a) National Policy Statement: Urban Development 2020 (primary national planning instrument for urban growth that sets the requirements for the FDS);
- b) National Policy Statement: Freshwater 2020;

⁷ For example, the Queenstown Lakes Spatial Plan 2021 (outcomes), the Kāpiti growth strategy – Te Tupu Pai – Growing Well (overarching principles), Hamilton Future Proof (guiding principles).

c) New Zealand Coastal Policy Statement 2010.

The outcomes have also been drafted to recognise and provide for the matters of national importance and other matters set out in Part 2 of the Resource Management Act 1991, which are broadly embedded in the national policy statements outlined above.

Other legislation has also been considered in developing the FDS outcomes, including the Climate Change Response (Zero Carbon) Act 2019.

In addition to relevant policies and legislation, consideration was given to the 2019 FDS principles, the key themes arising through community feedback on recent Council consultations, and the outcome of discussions with Tangata Whenua.

4.3 Analysis and Options

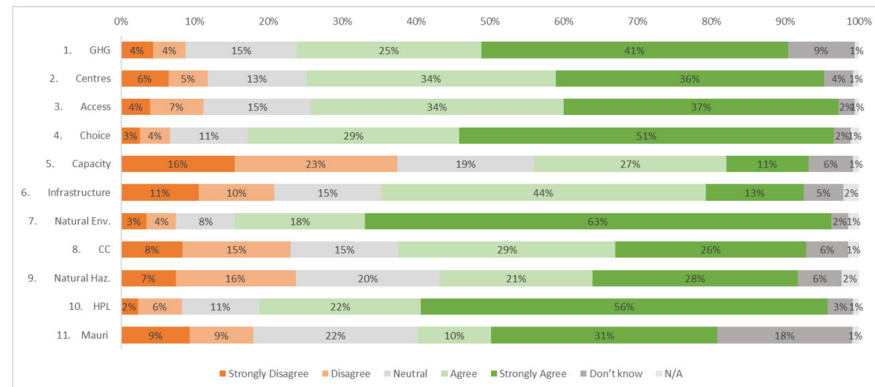
The outcomes developed for the draft FDS are derived from key relevant statutory requirements noted above, as well as key themes from feedback arising from recent consultation and engagement including on long-term plan consultation, the resource management plan reviews and FDS in 2021. They were also shaped by feedback from stakeholders and iwi. Outcomes were also considered in the context of the direction signalled in the draft national policy statements for indigenous biodiversity and highly productive land.

Each of the statutory documents contains objectives or requirements that can sometimes be in conflict. For example, community feedback and the directives of the RMA support the protection of highly productive land for productive uses. In Tasman, highly productive land surrounds Richmond, in locations that are otherwise well suited for growth given their proximity to services and amenities, favourable topography and limited constraints. Across the FDS, reducing carbon emissions to the greatest extent practicable, may mean that limited growth could occur, which would not meet other outcomes about housing affordability and providing sufficient capacity. The FDS seeks to achieve these outcomes as a whole, acknowledging the more effectively achieving one outcome may come at the expense of another, and some parts of the FDS align with each outcome to a greater or lesser degree. It is important that the FDS is not contrary to any of these outcomes.

This illustrates that often trade-offs are required. Outcomes, objectives, or principles are a planning method to manage and resolve these trade-offs in a strategic context. These trade-offs are illustrated in the matrix at Figure 10 on page 70 of the Technical Report. Achieving a balance between the outcomes has been a key driver in assessing the spatial scenarios and potential growth areas.

While there was general support for the intent of the majority of outcomes, many submitters found that the way the outcomes were presented in the draft, including the form of the consultation questions and the purpose of the outcomes was not clear. It is acknowledged that the consultation questions could have been framed differently. As noted above, many people saw them as either statements of the current situation or objectives, with some submitters noting they do not appear to be outcomes from the proposal. In our view, this can be resolved by adding further explanation to the purpose and role of the outcomes themselves on page 9 of the FDS. The outcomes could also be renamed 'objectives' to avoid any confusion regarding their purpose.

In relation to the outcomes themselves, the majority of submitters supported or strongly supported the outcomes as illustrated below. Notably, Outcome 5 received significantly less support with nearly 40% either disagreeing or strongly disagreeing with the outcome.



Outcome 5 is as follows: *Sufficient residential and business land capacity is provided to meet demand.* Most of the opposition to this outcome related to broader concerns over the extent of growth provided for in the FDS, the amount of greenfield development and the use of high growth projections. As outlined in the sections above, the purpose of the FDS is to show how and where the Councils will provide sufficient housing and business capacity to meet demand. This links with Policy 2 of the NPSUD. For these reasons, in our view, Outcome 5 should be retained unchanged.

Submitter 31705 has raised several concerns with the draft FDS that relate to the outcomes, in particular:

- Too much emphasis has been placed on the NPSUD;
- Insufficient weight given to climate change, including carbon emission reduction;
- Greater consideration should be given to renewable energy, with the submitter highlighting at the Hearing that the draft FDS should have considered the National Policy Statement on Renewable Electricity Generation and Electricity Transmission.

The submitter points out that there are potential conflicts between the NPSUD requirements to provide at least sufficient development capacity (i.e. enable growth to meet demand) and other policy directives to move towards a zero carbon economy. Submissions on climate change and emissions reduction are discussed in more detail in Section 7 of the report below. The Government's Emissions Reduction Plan published 16th May 2022, notes as one of its actions: **"Assess the extent to which existing urban development and infrastructure policy and programmes (eg, NPS-UD) are aligned with emissions-reduction goals"(7.4).** The requirements of the NPSUD are at the heart of the draft FDS because they set the core requirements for it. As discussed above, the draft FDS seeks to achieve a balance between the outcomes.

Both the National Policy Statement on Renewable Electricity Generation 2011 and Electricity Transmission are of some relevance to the draft FDS, particularly with respect to protecting significant infrastructure. These policies are aimed at ensuring infrastructure can operate efficiently and is protected from reverse sensitivity effects. The generation of electricity and the move to renewable energy is a national level issue and one which local Councils have limited ability to influence directly. At the local level through Resource Management Plans, the Councils can

ensure that significant electricity corridors are protected, including through designations and limitations on potentially sensitive activities close to significant infrastructure. Councils can also encourage community-scale projects (small scale solar and wind energy generation), through enabling rules in the Resource Management Plans.

4.3.1 Recommended changes to the draft FDS

- (1) Section 6 and throughout the document where ‘outcomes’ are referred to: change the term ‘outcomes’ to ‘objectives’.
- (2) Section 6: add further description on the purpose/role of the outcomes/objectives, including that they are aspirational, and implementing the FDS will require balancing and trade-offs between outcomes/objectives.

5.0 Multi Criteria Analysis Framework

5.1 Issue Statement

A limited number of submitters provided specific comment on the multi-criteria analysis (MCA) framework.

Nelson Tasman 2050 felt that the use of a MCA in the FDS, and how it was used, to be questionable. This submitter considered that the use of this number of criteria meant that weighting some criteria made little difference. Nelson Tasman 2050 gave specific feedback on particular criteria, and consider that many sites assessed using the MCA may not meet important NPSUD objectives but could still make it into the FDS. In particular this submitter raised concern that the MCA resulted in little difference in scoring between brownfield and greenfield sites. They also considered that greenhouse gas emission reduction should be one of the weighted criteria.

Zero Carbon Nelson Tasman submitted that there are inconsistencies in column 15 (coastal and river inundation and coastal erosion) of the MCA in terms of alignment with the strategic constraints mapping.

Other submitters felt that additional criteria should have been included, such as embodied carbon, and that ‘zero carbon’ should have been a specific criterion.

5.2 Statutory Requirements

There are no specific statutory requirements for using an MCA as part of an FDS, nor does the legislation set out what must be included if one is used. However, the many of the criteria have been drafted to reflect direction set by legalisation and national policy.

As set out in the Technical Report (section 6.2.2), the criteria used broadly covered the same themes as the MCA used in the 2019 FDS. Specific changes were made to the previous criteria to better align with new and upcoming national policy direction, such as the NPSFM (Criteria 12) and draft NPSHPL (Criteria 11). Criteria also align with other legislative direction, for example Criteria 15 for natural hazards is linked to significant risk from natural hazards (section 6(h) RMA) and the NZCPS.

5.3 Analysis and Options

Part 3.14(b) of the NPSUD requires a consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS. The MCA is just one of the tools used to assess potential growth areas, and as per the Technical Report it should not be used as the sole determinant of whether to include or exclude a site from the FDS. In order to include enough sites to achieve sufficient development capacity, some sites that scored poorly for some criteria have been included because they align with the preferred spatial scenario which itself was selected follow the evaluation required by Part 3.14(b) of the NPSUD. Due to the challenges in providing sufficient development capacity, the majority of sites assessed were included in the draft FDS, if not otherwise excluded for 'no-go' reasons such as effects on areas of cultural significance or health of waterbodies. As a result of submissions, the Councils are using the MCA to reassess several sites, as well as assess new sites, which may result in some sites being removed and new ones included, or the overall scores changing.

The MCA is one method for comparing sites against each other. The growth areas have also been tested against other components of the strategy, for example the outcomes and preferred spatial strategy.

A 'well-functioning urban environment' as defined by the NPS-UD, incorporates a range of factors and also needs to respond to various local contextual matters specific to discrete areas, some of which require subjective analysis. As such, what constitutes a well-functioning urban environment will vary over the extent of the FDS.

Other councils have used an MCA or similar framework in the preparation of recent growth strategies, illustrating that this is a common planning method for strategic planning documents. This includes for example the Queenstown Spatial Plan, Kāpiti growth strategy – Te Tupu Pai – Growing Well and the Heretaunga Plains Urban Development Strategy, and many others⁸.

In terms of outputs, with respect to the contention that evaluation has resulted in little difference between greenfield and brownfield sites, the MCA and associated weighting has resulted in a growth strategy where the vast majority of identified intensification areas have come out the best performing. For greenfield sites, those that are most proximate to the main centres of Richmond and Nelson have also performed well relative to other, more isolated greenfield areas. A simple demand analysis was also undertaken through mapping of the Land Value to Capital Value ratio on intensification sites within existing urban areas. The purpose of this analysis was to provide additional scoring for brownfield sites that were more suitable for intensification and inform potential building heights and density assumptions.

The various criteria within the MCA were developed from a broader range of objectives across a number of relevant national policy statements, not solely the NPSUD. There is no weighting or importance assigned to any particular piece of national direction and their consideration involves a balancing exercise against sometimes conflicting objectives. For example, several of the most accessible areas within Nelson where a car-free/ low carbon lifestyle are most readily achievable such as the Wood or Tahunanui are also subject to potential risks associated with coastal

⁸ https://www.qldc.govt.nz/media/ndsdv0x3/7a-queenstown-lakes-spatial-plan-scenario-report_mar21.pdf, <https://www.kapiticoast.govt.nz/media/f5onhn5d/kapiti-coast-growth-strategy-review-growth-scenarios-report.pdf>, Section 3.2.1: <https://www.hpuds.co.nz/assets/Document-Library/Strategies/2017-Heretaunga-Plains-Urban-Development-Strategy-incl-Maps-AUG17.pdf>;

inundation and flooding. Similarly, new housing must be provided for in areas of high demand regardless of accessibility by public transport or proximity to employment/service centres (see Policy 5).

In terms of weighting a criterion for reducing greenhouse gas emissions, we consider this would be an inappropriate criterion to incorporate into a no-go or pass/fail constraint. Reductions in emissions is also dependant on plans, strategies and policies outside the control of both Councils or the scope of the FDS itself (e.g. congestion charging).

Regarding the potential inconsistencies between the constraints mapping and MCA natural hazards criteria raised by Zero Carbon Nelson Tasman, the strategic constraints map is of a scale not suited for making detailed assessment against individual sites. The strategic constraints maps was itself informed by detailed flooding and inundation modelling preparing by both Councils. These detailed models were used for the assessment of individual FDS areas and have been included on the FDS GIS viewer.

Only a few FDS areas were identified as having a significant risk to natural hazards in relation to flooding and sea level rise. This is a result of the FDS areas covering broad areas which include areas potentially subject to significant risks from natural hazards, areas not at risk at all or areas subject to a low level of risk (e.g. ponding or flood depths below 10cm). The MCA score represents an aggregate of these these issues and reflects the fact that parts of FDS areas may be more suitable than others to support development or intensification. As part of the preparation of more detailed plan changes that would seek to enable greater levels of intensification, these more detailed differences would be taken into account down to a site-by-site or street-by-street level and would likely result in portions of the identified FDS areas being identified as not suitable for further development.

5.3.1 Recommended changes to the draft FDS

No changes are recommended with respect to the use of the MCA in the FDS. A number of changes to individual site scores have been made by the Councils' teams as a result of submissions and these are detailed in the Deliberations Report.

6.0 Climate Change and Emissions Reduction

6.1 Issue Statement

A large proportion of submitters raised the importance of the FDS contributing to a reduction of greenhouse gas emissions. This included approximately 50 submitters raising concern about these issues in Question 40. Key issues raised in relation to this included:

- (a) Concern that the proposed urban form will increase the use of vehicles and emissions as a result given the proportion of greenfield growth in the proposal;
- (b) Strong support for intensifying existing centres in order to integrate land use with transport, promote a compact urban form (and protect rural land from being expanded into);
- (c) Concern that there are various other ways to contribute to a reduction in greenhouse gas emissions, other than intensification and promoting a compact urban form. These included construction methodologies, housing typologies and energy usage in general.

In their submission and further discussions with Kāinga Ora following the hearing, Kāinga Ora recommended that the two councils work together on their various natural hazards workstreams in conjunction with the implementation plan for the FDS to ensure alignment. This in fact already happens. In addition, Kāinga Ora noted that alternative options for future growth areas should be considered in the event that the proposed growth areas become increasingly vulnerable to the extent that risk can no longer be managed.

6.2 Statutory Requirements

The RMA requires the councils to recognise and provide for significant risk from natural hazards (section 6(h)), and have particular regard to the effects of climate change (section 7(i)).

Objective 8(b), Policy 1(f) and Policy 6(e) of the NPSUD focus on ensuring urban environments are resilient to the current and future effects of climate change. Objective 8(a) and Policy 1(e) focus on environments support reductions in greenhouse gas emissions.

The Climate Change Response Act 2002 sets a legal framework to enable New Zealand to meet domestic and international climate change obligations (mitigation) and adapt to the effects of climate change (adaptation). In 2019 the Climate Change Response (Zero Carbon) Amendment Act committed New Zealand to reducing greenhouse gas emissions by 2050 in line with global commitments under the Paris Agreement. To meet this target, central government must set a series of five yearly emissions budgets and an Emissions Reduction Plan showing how these will be met. A final version plan was published in May 2022 and includes policies for every sector of the economy, including transport, energy and industry⁹.

The Climate Change Response (Zero Carbon) Amendment Act also requires the Government to develop a National Adaptation Plan in response to a national climate change risk assessment. The National Adaptation Plan is a strategic document that sets out objectives, strategies, plans and policies for climate change adaptation. A draft of the National Adaptation Plan has just been released, and we understand a final version is due out later this year¹⁰. The draft plan sets out that existing risk and/or impacts from this risk needs to be reduced, and the importance of land use and building in planning for resilience and minimising risk. The draft plan also notes that the resource management reforms will assist spatial planning and locating development in areas away from climate-related natural hazards, as well as setting out a framework for managed retreat.

6.3 Analysis and Options

6.3.1 Greenhouse gas emissions

6.3.1.1 Accessibility

Along with industry, households are a key contributor to carbon emissions in New Zealand, with transport making up about 90% of total household emissions¹¹. The draft FDS has focussed on analysing how the future urban form of Nelson and Tasman can best support a reduction in greenhouse gas emissions, while achieving the other objectives of the NPSUD set out in the

⁹ <https://environment.govt.nz/what-government-is-doing/areas-of-work/climate-change/emissions-budgets-and-the-emissions-reduction-plan/>

¹⁰ <https://environment.govt.nz/assets/publications/Draft-national-adaptation-plan.pdf>

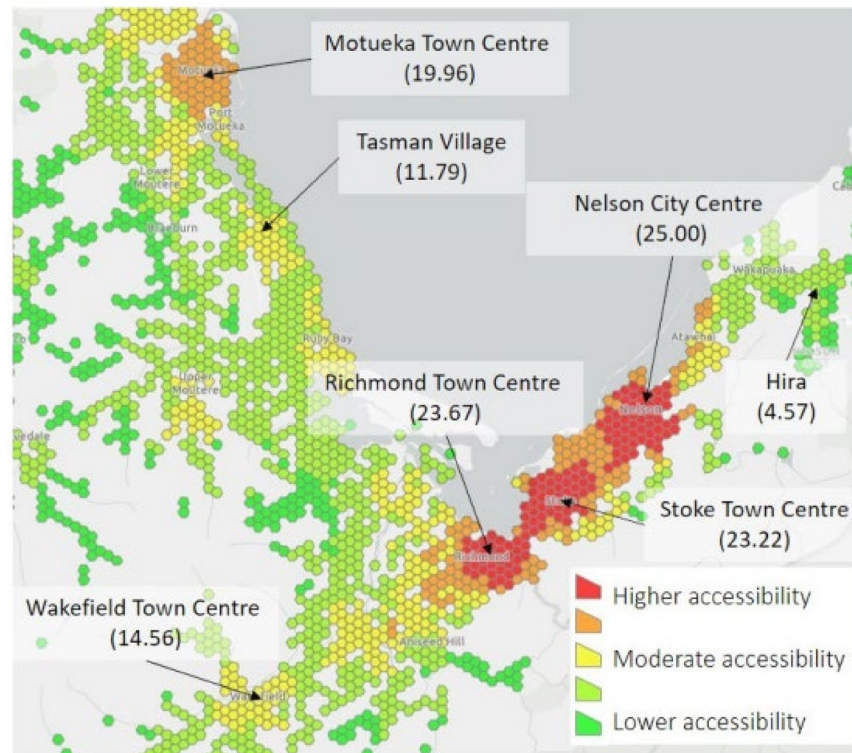
¹¹ <https://www.stats.govt.nz/information-releases/greenhouse-gas-emissions-by-region-industry-and-household-year-ended-2019#tasman-and-nelson>.

sections above. This is based on the principle that enabling people to live close to where they work and recreate will reduce reliance on cars for travel. Greater population density also supports greater efficiency of public transport.

The accessibility mapping undertaken for the draft FDS has been the primary tool for evaluating this. This mapping identifies those parts of Nelson and Tasman that are accessible to a range of commercial activities and community services. The methodology for the assessment is detailed in full in Appendix 1 of the Technical Report. The results of this analysis are shown from page 26 of the Technical Report and are reproduced below.

The accessibility analysis was utilised in several ways:

- The seven spatial scenarios developed were assessed in terms of their relative accessibility, with those that provided for growth in more accessible locations scoring better (see Figure 10 of the Technical Report);
- Each proposed growth area was assessed using a Multi-Criteria Analysis. Criterion 1 assessed the level of accessibility by public and active transport to services and gave this the highest weighting of all the criteria. Sites with a high degree of accessibility generally performed better overall as a result;
- Within the preferred spatial scenario, heights and densities were allocated according to relative accessibility, with the most accessible locations providing for the most intensive development, including in and around Nelson City Centre, Stoke and Richmond Centre. While uptake of intensification is assumed to be modest, the heights and densities enabled nevertheless provide for a significant amount of development to occur.



6.3.1.2 Additional Analysis

Calculation of greenhouse gas emissions associated with different forms of growth, e.g. intensification compared to greenfield, is an emerging area of analysis. As far as we are aware, no other councils or Government agencies have a methodology in place to measure this. We have discussed this gap with both Kāinga Ora and Waka Kotahi, and we are aware that Waka Kotahi is working on a methodology that will form part of the Emissions Reduction Plan. We understand that this methodology will be based on carbon emissions generated by transport, and will not account for emissions from industry, energy generation or other household emissions. Once this is available, the Councils can test emissions from different growth areas and consider the results of this during implementation, including emissions as part of cost benefit analysis when rezoning land.

Since the draft FDS was released, and in response to submissions, Tasman District Council has completed an assessment of Vehicle Kilometres Travelled (**VKT**) for each of the urban growth areas and has assessed GHG emissions from three different spatial growth scenarios. The detail of this is set out in the Staff Deliberations Report to the FDS Subcommittee

6.3.1.3 Other Considerations

In addition to emissions associated with transport, enabling opportunities for renewable energy will also support local opportunities to reduce carbon emissions. The FDS does not explicitly identify growth sites for renewable energy infrastructure, for example a hydrogen production facility or other new technology. However, identifying at least sufficient industrial/business land,

including areas for heavy industry where there is demand, helps address potential land supply barriers for this type of activity occurring. This is a matter for the Councils' resource management plans to address. Infrastructure for electric and/or hydrogen charging stations will also become increasingly important in supporting the shift to electric vehicles and the Council can work to proactively integrate this into new and redeveloping public facilities and parking areas.

6.3.2 Climate change and natural hazards

The Councils are working together on a resilience strategy for climate change.

To date, both councils have developed and published coastal hazards and sea level rise mapping (see [Tasman mapping](#) and [Nelson mapping](#)) and are now at different stages within steps 3 – 5 within the Dynamic Adaptive Pathways Planning (DAPP) framework. This work considers values and objectives, vulnerability and risk, and options for coastal management. Climate change and adaptation planning is extremely complex and challenging for all of New Zealand, as well as globally. Both Councils are awaiting national guidance from central government which will strongly influence next steps in their respective work programmes, including the resource management reforms and the National Adaptation Plan noted above.

As set out in the Technical Report, both Councils have also adopted climate action plans which sets out their commitments to address climate change, including mitigation and adaptation actions. Through future reviews of these plans, there are opportunities to consider implementing additional measures to support a reduction in greenhouse gas emissions, e.g. providing the infrastructure necessary to support electric vehicles.

As set out in the FDS, a number of growth areas in Nelson, including in the Wood and Tahunanui are subject to the DAPP program of work. These areas are not required to meet capacity, and their inclusion in the FDS will be reviewed annually as part of the annual implementation plan, as well as in the three yearly review of the FDS, and any adjustments made following the outcomes of the DAPP process.

6.3.3 Recommended changes to the draft FDS

No changes to the draft FDS are recommended on this issue, however, we recommend that the Councils but take into account VKTs analysis undertaken by Tasman District Council and any other GHGs analysis tools made available by the Government in implementation and staging of the FDS.

Growth Strategy

7.0 Greenfield / Brownfield Splits and Other Matters

7.1 Issue Statement

As discussed in the previous sections, the most significant issue that emerged from the submissions related to the balance between greenfield expansion and intensification of existing centres.

Approximately 69% of submitters did not think that we have got the balance right in the core proposal between intensification and greenfield development (Question 29). When asked what they would propose (Question 30), 50% of submitters said more intensification and 34% said less

greenfield expansion. This was also raised more generally by approximately 45 submitters in response to Question 40.

The key issues included:

- (a) Significant support for intensification of existing urban centres as well as within existing smaller towns to enable a compact urban form where people can shop, live and work locally;
- (b) Concern that the FDS does not prioritise intensification enough and a larger proportion of the growth should be accommodated within existing areas rather than expanding into new greenfield areas; and
- (c) Significant opposition to the proportion of greenfield growth proposed in the FDS due to increased vehicle use, cost of infrastructure servicing and the low-density housing typologies that are perceived to be encouraged through greenfield growth.

7.2 Statutory Requirements

Policies 1 and 2 of the NPSUD are most relevant to this issue and relate to achieving well-functioning urban environments and providing at least sufficient development. They link with the purpose of an FDS set out in clause 3.13 of the NPSUD.

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

- (a) have or enable a variety of homes that:
 - (i) meet the needs, in terms of type, price, and location, of different households; and
 - (ii) enable Māori to express their cultural traditions and norms; and
- (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
- (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
- (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
- (e) support reductions in greenhouse gas emissions; and
- (f) are resilient to the likely current and future effects of climate change.

Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term. Clause 3.2(1) of the NPS-UD gives effect to this policy.

These policies must be read as a whole. That is to say, the FDS must show how the Councils will provide at least sufficient development capacity **while** achieving a well-functioning urban environment, and accounting for other relevant policies in legislation and national policy statements. This includes matters like the efficient use and development of natural and physical resources (s7(b) RMA).

Importantly, the concept of well-functioning urban environment does not predetermine the urban for outcomes for cities, and provides some flexibility for that to be set within the context of the

residential and business demands, and particular development opportunities and constraints of cities and districts.

7.3 Analysis and Options

7.3.1 Greenfield / Brownfield Splits

The draft FDS contains indicative splits of greenfield and brownfield development that flow from the capacity estimates detailed in the report above. Many submitters have criticised these splits as leaning too heavily on greenfield.

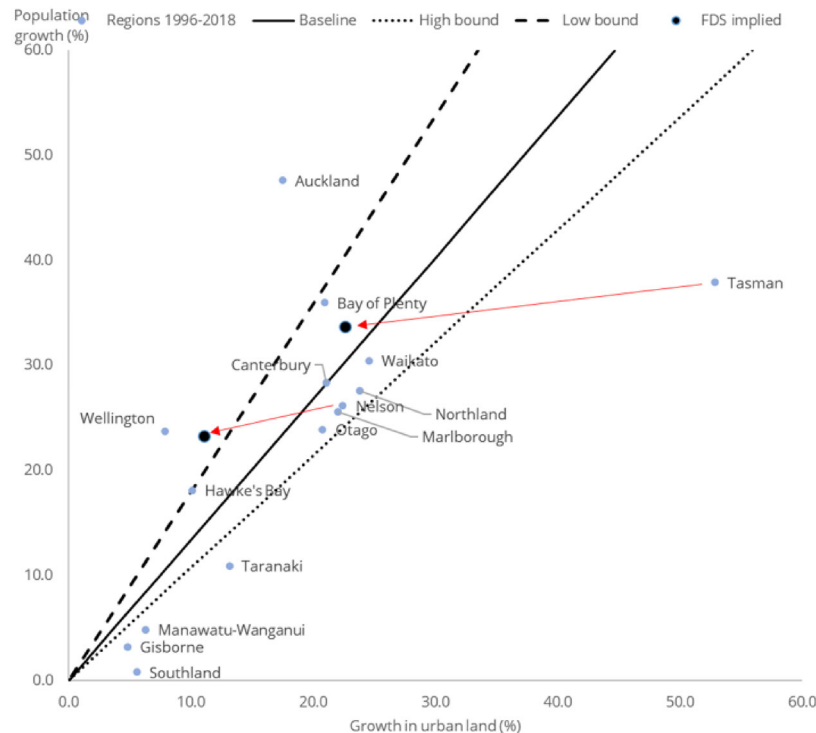
The draft FDS splits for the core proposal are provided below. This compares with the more detailed breakdown provided in the Capacity Memo, for the draft FDS and as they are proposed to be amended in response to submissions (see page 8). This illustrates that the greenfield capacity includes already zoned but as yet undeveloped land, including Marsden and Ngawhatu Valley. In this regard, the amount of 'new' greenfield land provided for in the draft FDS is less than the percentages below imply.

	Draft FDS Brownfield	Draft FDS Greenfield (incl Rural Residential)
Nelson	65%	35%
Tasman	24%	76%
Nelson Tasman combined	48%	52%

The approximate 50/50 split between greenfield and brownfield is also comparable to other cities in New Zealand. See the Wellington Region's 2019 HBA, which indicated a 55/45 split, the Hamilton Future Proof Strategy 2021, which indicated a 50/50 split.

In addition to this, Sense Partners has undertaken further analysis at Appendix 1, considering the historic rate of growth in urban land for New Zealand's regions and compared them to the rates implied by the FDS. The key extract from this analysis is as follows:

*These points show the implied growth in urban land is much lower than history. Rather than growing at historical rates of growth, **urban land growth for Tasman is much curtailed** – the draft FDS **suggests a dramatic fall in land growth in the Tasman towards historical averages for each New Zealand region**. For Nelson, a smaller fall in urban land growth is suggested. Urban land growth is expected to be much closer to the low rate of land growth observed for the Wellington region. **Rather than simply extrapolating growth, this suggests a more compact urban form in the draft FDS that over this earlier period.***



This analysis shows that the draft FDS represents a significant improvement from the 2019 FDS in terms of moving towards a more compact urban form. This can also be understood in the context of the differences in the growth projections. In 2019, the expected demand for housing in Nelson and Tasman under a high growth scenario was 24,000 households. This has increased to 29,000 in for this FDS. Most of this additional growth is being accommodated through greater levels of intensification, with a modest increase in the amount of greenfield sites when compared with 2019. This also provides a counterpoint to submitters that assert the draft FDS is a continuation of past growth trends and planning approaches.

7.3.2 Rural Urban Boundary

Some submitters have requested that the FDS include a Rural Urban Boundary (“RUB”) as a means of containing urban growth and promoting intensification. One of the only cities that includes a RUB in its growth strategy is Auckland. This has been implemented in the Auckland Unitary Plan and links with detailed policies in the Regional Policy Statement (“RPS”) regarding the instances where a change or extension to the RUB would, or would not be appropriate. In this regard, it is the policies in the RPS that relate to the boundary between urban and rural zones that are important, rather than the RUB itself. Through the review of the Resource Management Plans, the Councils will need to consider the range of statutory policy options available to manage urban expansion. These require detailed evaluation, and may include a RUB and other options such as strengthened RPS policies. In our view, this is not a matter for the draft FDS, and it would be better considered through a plan review process that is subject to a detailed cost benefit analysis.

7.3.3 Housing Affordability

Kāinga Ora raised concerns that the draft FDS does not place enough emphasis on housing affordability. In subsequent discussions with Kāinga Ora they agreed that ensuring sufficient land supply and providing capacity for growth is the key way in which the FDS can assist with housing affordability. This is consistent with Objective 2 of the NPSUD, which states that “planning decisions improve housing affordability **by** supporting competitive land and development markets.”

A number of other submitters suggested that the draft FDS should provide for inclusionary zoning and other methods aimed at requiring (rather than incentivising) affordable housing. Inclusionary zoning is an option available to the Councils, and this is being explored by other Councils across New Zealand. It is a statutory planning tool and requires changes to the Councils Resource Management Plans to implement. It has been previously introduced as an option by the Government through the Housing Accords and Special Housing Areas Act, which has since been repealed. No other Councils have yet successfully applied these provisions in their plans. Auckland Council sought to introduce inclusionary zoning provisions through its Unitary Plan in 2016. It was highly contested and ultimately unsuccessful. Inclusionary zoning is a complex policy area, requiring robust economic evidence assessing whether it achieves housing affordability, when viewed in the context of the wider housing market and the other factors that influence house prices. For this reason, we recommend that this issue is best addressed through the Councils Resource Management Plans, where a detailed cost benefit analysis can be undertaken. The Government may also choose to address this through the upcoming RM Reforms.

8.0 Tangata Whenua Feedback

8.1 Issue Statement

Several submissions were received from iwi and hapū. Key themes arising from these submissions are:

- Residential and business growth – general support for intensification and increasing housing supply in existing built-up areas over sprawling low density rural residential development, however matters of market feasibility, building requirements and topography need to be addressed.
- Consultation and capacity of iwi and hapū – general concern regarding resourcing and capacity of iwi and hapū to respond, including during pre-notification engagement and during the Special Consultative Procedure.
- Focus on Te Taiao – especially from Te Ātiawa, relating to achieving net enduring restorative outcomes and opposing the general presumption in the NPSUD and FDS on growth.
- Sites near Tasman Village (the secondary proposal) – concern regarding water supply servicing and cultural sites (Te Ātiawa) that need to be discussed and resolved with iwi and hapū.
- Site specific support – support from Wakatu House for specific sites in Nelson, Saxton, Brightwater and Motueka and from Ngāti Apa ki te Rā Tō in St Arnaud.

In addition to these submissions, since finalising the draft FDS for consultation, TDC has had further discussion with Te Ātiawa o te Waka a Māui Trust. Te Ātiawa reiterated their previous significant

concerns regarding the three sites (T-166, T-167 and T-168) that would make up a new community near Tasman Village (the secondary part of the proposal).

8.2 Statutory Requirements

The RMA, the LGA and the NPSUD all set out statutory requirements in relation to tangata whenua values and engagement. The most directly relevant provisions are set out in section 4 of the Technical Report and are summarised as follows:

- RMA s6(h) – **the relationship of Māori and their culture and traditions** with their ancestral lands, water, sites, waahi tapu and other taonga must be recognised and provided for;
- RMA s7(a) – particular regard shall be had to **Kaitiakitanga**;
- NPSUD Objective 5 and Policy 9 – planning decisions **take into account the principles of Te Tiriti o Waitangi**, involve iwi and hapū, take into account iwi and hapū values and aspirations for urban development, provide opportunities in appropriate circumstances for Māori involvement in decision making, and operate in a way that is consistent with iwi participation legislation;
- NPSUD Parts 3.13 and 3.14 – requires that the FDS include a statement of iwi and hapū values and aspirations for urban development and that the FDS is informed by Māori, and in particular tangata whenua values and aspirations for urban development.

8.3 Analysis and Options

Approach to growth

Regarding the FDS's focus on growth, Te Ātiawa's position and the overall issues expressed with the approach to growth are acknowledged and understood.

The development of the FDS is guided by the NPSUD, with an emphasis on ensuring sufficient residential and business land for anticipated growth and demand over the next 30 years. It is acknowledged that this directive, informed by a predominantly Western worldview, does not always sit comfortably with the Te Ao Māori worldview and the specific request from Te Ātiawa for "net enduring restorative outcomes." This tension is acknowledged, and specific criteria have been incorporated within the Multi Criteria Analysis framework to ensure that areas identified for growth are done so in a way that ensures the protection and enhancement of ecological elements, and avoids areas which could exacerbate existing adverse ecological effects. The protection and enhancement of the environment and people is also a key focus. It is considered that the draft FDS and more specifically Multi Criteria Analysis framework appropriately achieves this by balancing protection and enhancement with the need to accommodate future growth and change in residential and commercial development over the next 30 years.

It is important that balance is struck between these often competing priorities, and it is considered that the Multi Criteria Analysis framework appropriately achieves this.

Process

In terms of the process, the challenges faced by iwi and hapū with respect to time and capacity to review the FDS is acknowledged and understood. This point was made consistently by representatives from Te Ātiawa and other iwi and hapū throughout the pre-notification consultation process for the draft FDS.

Both Councils are operating within the parameters of the NPSUD as directed by Central Government. This includes a requirement to following the Special Consultative Procedure for the notification, which has been following accordingly.

Prior to notification of the draft for submissions, every effort was made by the Council teams to genuinely engage with iwi and hapū as best as they could within the constraints of the NPSUD and also the timeframes set by the Joint Committee. This included undertaking effective consultation that was early, meaningful and, as far as practicable, in accordance with tikanga Māori. Information was shared as soon as it was available, often before it was taken back to the Joint Committee for consideration. Throughout the pre-notification engagement process, the capacity and resourcing constraints were acknowledged and provided for by making Council staff available for answering questions and arranging hui (both virtually and kanohi ki te kanohi, depending on the preferences of iwi and hapū representatives).

The pre-notification engagement process and Special Consultative Procedure has ensured that iwi, hapū, key stakeholders and the community at large have had their say in the development of the FDS.

Secondary part of the proposal

Regarding the secondary part of the proposal, this is discussed further in the Officers' deliberations report to the FDS Subcommittee and it is recommended that the secondary part of the proposal be removed from the draft FDS. This aligns with the concerns raised by iwi and hapū.

8.3.1 Recommended changes to the draft FDS

A number of changes to the draft FDS are recommended, several of which align with the broad matters raised by iwi and hapū in their submissions. A recommended change is the removal of the secondary part of the proposal, the reasons for which are addressed in the deliberations report.

There are no additional specific changes to the FDS text or mapping that are considered necessary in response to iwi and hapū submissions.

Implementation

9.0 How it Fits

Section 16 of the draft FDS outlines the approach to implementation. As a secondary step of the FDS, the NPSUD requires Nelson City Council and the Tasman District Council to jointly prepare an FDS implementation plan as a single document. This is different from the requirements of the previous NPS-UDC.

The implementation plan must be updated annually, is not part of the FDS, and does not need to be prepared using the SCP, nor does it have the effect of an FDS as an informing document to RMA planning documents or LTPs etc. Based on this, we see the implementation plan as a procedural document that sets out in detail what the Councils will do to achieve the FDS. The implementation of the FDS itself can, and should in our view, provide direction on what the implementation plan should cover. The table below summarises this and outlines the statutory requirements and our recommendations.

	FDS – Implementation section Subject to the current FDS process	Implementation plan To be developed separately as a next step
Purpose	<p>Promote long term strategic planning.</p> <p>Show where and how sufficient capacity will be provided, and supporting infrastructure.</p> <p>See clause 3.12 & 3.13 of the NPSUD</p> <p>Recommend providing guidance in the FDS on implementation but leave detailed planning to the implementation plan.</p>	<p>Detail how the Councils will implement the FDS.</p> <p>No guidance in the NPSUD on what the implementation plan must contain.</p> <p>Recommend developing the implementation plan collaboratively with infrastructure providers so that detailed actions can be developed, which are regularly updated.</p> <p>See clause 3.18 of the NPSUD</p>
Who prepares it	Jointly prepared by TDC and NCC.	Jointly prepared by TDC and NCC.
Consultation	<p>Special Consultative Procedure applies i.e. wide community engagement.</p> <p>Stakeholder engagement occurs.</p>	<p>No required to use a special consultative procedure.</p> <p>Recommend engaging with infrastructure providers to ensure good alignment with provision on non-Council infrastructure to FDS areas e.g. schools, health & regional transport.</p>
Timeframe	<p>Reviewed 3 yearly.</p> <p>New FDS every six years.</p>	Updated annually.
What it informs	<p>RMA planning documents.</p> <p>LTPs, infrastructure strategies, RLTPs & other Council strategies.</p> <p>See clause 3.17 of the NPSUD.</p>	<p>Clause 3.17 of the NPSUD does not apply.</p> <p>Therefore, the implementation plan, will not have legal weight in decision making.</p> <p>Intended to set out what the Councils will do to implement the FDS and is therefore a procedural document.</p>

10.0 Infrastructure

10.1 Issue Statement

Various submissions raised concern about the capacity of infrastructure to service the proposed growth and largely related to the overarching theme of the preference for intensification over greenfield growth. Key issues included:

- (d) Concern about the funding of infrastructure to ensure that the focus is on long-term affordability and efficiencies. This largely related to promoting intensification given the perceived ease of servicing in comparison to greenfield expansion;
- (e) Providing for infrastructure that factors in long-term shifts in urban form and transportation, with a particular focus on public transport and cycling that are cheaper to maintain in the long term; and
- (f) Concern about the capacity of existing infrastructure particularly regarding public transport and the three-waters network. There was support for improving existing networks but concern was raised by submitters about new infrastructure being planned ahead of this, particularly to support new growth areas.

Kāinga Ora submitted that while the Technical Report identified that the wastewater treatment plant at Bell Island would require upgrading, there was no detail on how this would occur so as not to delay implementing the growth strategy.

Kāinga Ora and many others noted that social infrastructure is also important for the FDS. For example, schools will need to be located in the right places and have enough capacity to accommodate the growth areas.

Kāinga Ora also submitted that the FDS should include clearer statements relating to the integration with infrastructure planning and funding and thought that more detail should be provided for each growth area and how it relates to Long Term Plans.

10.2 Statutory Requirements

The NPSUD Part 3.13(1)(b) sets out that one of the purposes of the FDS is to *‘assist the integration of planning decisions under the Act with infrastructure planning and funding decisions’*.

Part 3.13(2) sets out that every FDS must spatially identify *‘the development infrastructure and additional infrastructure required to support or service that development capacity, along with the general location of the corridors and other sites required to provide it’*. Both ‘development infrastructure’ and ‘additional infrastructure’ are defined.

Part 3.14(1)(c) requires that an FDS is informed by *‘the relevant long-term plan and its infrastructure strategy, and any other relevant strategies and plans’*.

Infrastructure providers are required to be engaged with as part of preparing the FDS (Part 3.15(2)(b), (d) and (e)).

Further the NPSUD strongly encourages Councils to use the FDS to inform long term plans and infrastructure strategies and regional land transport plans.

10.3 Analysis and Options

When viewed as a whole, it is clear that the NPSUD intends for the FDS to set the ‘big picture’ for where growth should occur and what key infrastructure is needed to support it. This then devolves to the more detailed land use and infrastructure planning that is needed to inform rezoning and infrastructure planning and funding.

Section 16.2 of the draft FDS includes details of the strategic infrastructure (transport and three waters) needed to support growth, and illustrates this spatially. Infrastructure already budgeted for in the Councils’ Long Term Plans was excluded. The FDS is a 30-year plan and infrastructure funding cycles operate 10-yearly through the Councils Long Term Plans. The draft FDS therefore focussed on unbudgeted trunk infrastructure. This infrastructure will therefore be rolled out as it is needed over the life of the FDS. It will also be subject to more detailed technical evaluations through the development of the implementation plan and the Councils’ Long Term Plans. We do not see value in highlighting what infrastructure shown on Figure 23 is funded through the Councils Long Term Plans, given that those documents clearly illustrate that already. Nor do we see value in developing detailed infrastructure plans for particular areas – that would not be consistent with the strategic role of the FDS.

Several submitters requested that the draft FDS include further details on public transport routes. These are shown on Figure 23 of the draft FDS and show public transport connections between Nelson, Stoke, Richmond, Brightwater, Wakefield, Māpua and Motueka, being the main centres within the combined urban environment. The draft FDS proposes increasing the frequency of public transport routes to promote greater use of public transport and this will be a key matter to address through the Councils Regional Public Transport Plans. We do not recommend further changes to the public transport information in the draft FDS.

With respect to Bell Island wastewater capacity, discussions with the Nelson Sewerage Regional Business Unit (NRSBU) during the preparation of the FDS indicated that the NRSBU did not have any significant concerns with servicing the preferred growth scenario. They are currently working on a 50-year master plan and will look to reflect the FDS growth in this planning. NRSBU advice is that the capacity of the wastewater treatment plan can be increased to meet projected growth. Work is underway now to increase capacity between Richmond and Bell island which will be sufficient until 2040. NSRBU is considering plans for a new inland treatment plant as part of the 50-year master plan.

The NPSUD requires the FDS to spatially identify ‘additional infrastructure’, which includes schools, open spaces, community infrastructure and network infrastructure (power, gas and telecommunications). We have engaged with infrastructure providers throughout the development of the draft FDS and they have advised that their approach is to plan for infrastructure in response to the FDS. That is, schools, network providers etc will provide facilities where growth is planned to occur. This happens through implementation, and in our view the implementation plan is the most appropriate mechanism for integrating infrastructure provision with growth. This can be undertaken with knowledge of the staging strategy that would form part of the implementation plan, discussed further below. In relation to open space, the Councils can also undertake open space network planning as part of implementing the FDS. This can be done on a city wide scale or neighbourhood scale – ideally both – as a next step.

10.3.1 Recommended changes to the draft FDS

No changes are recommended to the infrastructure section of the FDS.

11.0 Staging of Development

11.1 Issue Statement

The draft FDS does not include details of how and when greenfield land will be released for development. The draft FDS states that this will be determined through the annual implementation plan that must be prepared jointly by the Councils and other planning processes, most relevantly the Long Term Plan and associated Infrastructure Strategies.

Several submissions have requested that the implementation section of the FDS include details on the staging of development, similar to the 2019 FDS. Specifically, the submitters noted:

- a) **Ministry for the Environment** – seeks clarity regarding timeframes on intensification to better understand the implications on the school network, to assist with MoE's planning and investment decisions;
- b) **Waka Kotahi** – requests inclusion of staging and timing of development to assist with alignment of investment decisions with growth. Without certainty around staging there is a risk of spending money in locations that are out of step with council and developers. Waka Kotahi request a partnership approach to developing the Implementation Plan and Intensification Action Plan.
- c) **Kāinga Ora** – notes that it is useful to have an indication of the staging/sequencing of urban areas as per the 2019 FDS and requests that this approach is continued in the 2022 FDS.

The thrust of these submissions is that staging in the FDS assists with the integration of infrastructure planning and funding with urban growth. We discuss this further in the analysis section below.

In addition to this, a number of submissions raised concerns about the low rate of intensification assumed in the draft FDS and the high amount of greenfield development proposed. These submissions were concerned that more greenfield development is counter to statutory and FDS outcomes to reduce greenhouse gas emissions and protect the natural environment. While these submissions do not comment specifically on staging of development, it is a relevant matter to consider in responding to the issues raised. We address this in further detail below.

11.2 Statutory Requirements

The policies of the NPSUD that are particularly relevant to this issue are as follows:

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

- (g) have or enable a variety of homes that:
 - (iii) meet the needs, in terms of type, price, and location, of different households; and
 - (iv) enable Māori to express their cultural traditions and norms; and

- (h) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
- (i) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
- (j) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
- (k) support reductions in greenhouse gas emissions; and
- (l) are resilient to the likely current and future effects of climate change.

Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.

Policy 8: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: unanticipated by RMA planning documents; or out-of-sequence with planned land release.

The previous National Policy Statement: Urban Development Capacity (2016) required Future Development Strategies to “identify the broad location, timing and sequencing of future development capacity over the long term...” This requirement has been removed from the NPSUD and has been replaced with a new requirement for Councils to prepare an implementation plan for the FDS annually. This requirement applies to the Tier 2 urban environment and must be prepared jointly by Nelson City Council and Tasman District Council. This document does not require the use of a special consultative procedure; however, the Councils may choose to undertake consultation in preparing the document, and this may be desirable in order to understand the views and development programmes of housing and infrastructure providers.

11.3 Analysis and Options

While the NPSUD signals a change in policy direction on this issue, the Councils are able to include staging in the FDS if desired. In considering this, a range of options are available to the Councils, including:

- a) Option 1: Do not include staging details in the FDS and use the implementation plan and other planning processes outside of the FDS to define staging, such as the LTP and infrastructure strategies;
- b) Option 2: Include detailed staging within the FDS;
- c) Option 3: Include high level guidance on staging in the FDS together with the other tools identified in (a).

Notably, **all of these options provide for the development of an integrated staging strategy for the growth areas in the FDS.** The key difference is the timing for the development of that strategy.

At this point, it is relevant to address the submissions and recent discussion regarding the impact of greenfield land on the intensification objectives of the FDS. In the opinion of Fraser Colgrave (Nelson 2050) and Phil Osbourne (Kāinga Ora), the unconstrained release of greenfield land may have an impact on the viability of intensification by suppressing land values in the urban area, where

higher land values may be needed to incentivise redevelopment. The counter view to this expressed by Kirdan Lees (for the Councils) is that constraining the supply of greenfield land limits the competitive operation of land and development markets and is therefore contrary to the NPSUD (Policy 1(d)), and that developers will choose develop higher density forms of housing if there is genuine demand for these typologies. In our opinion, the preferred planning response on this issue as it relates to staging is likely to lie somewhere between these two views, noting that in addition to staging, there are other factors, such as the limitations of infrastructure provision, which would inherently moderate the release of greenfield land to the market and the effect on land values. In discussions following the Hearing, Mr Osbourne acknowledged that implementation and staging is critical to getting a balanced greenfield/brownfield mix. We agree, and the staging strategy for the FDS, whether included in the FDS itself or in the implementation plan, will be the key method for achieving this.

We address the advantages and disadvantages of the options below.

11.3.1 Option 1: Address staging in the implementation plan

The draft FDS does not include details of how and when greenfield land will be released for development. The intent of this approach is to provide the Councils with flexibility to be responsive to market conditions, and rely on the annual implementation plan and infrastructure strategies to analyse and determine when to service and rezone land for development.

This approach is consistent with the recent Queenstown Lakes Spatial Plan (2021) and the Heretaunga Plains Urban Development Strategy for Napier Hastings (2017). Those documents outline similar reasons for adopting this approach.

11.3.1.4 Advantages

- a) Market conditions and funding streams can change significantly and quickly over the life of the FDS. Relying on the implementation plan to determine staging, which is regularly reviewed, allows the Councils to respond to market conditions at the time and latest information. Land supply can be sped up or slowed down in response to demand. In our view, this better achieves Policy 8 of the NPSUD.
- b) The implementation plan must be prepared jointly by the Councils. This supports an integrated approach across Nelson and Tasman and minimises the risk of a disjointed staging strategy that undermines the outcomes of the FDS particularly those relating to delivering a compact urban form, a range of housing choices, and efficient and integrated infrastructure.
- c) Infrastructure provision is a key driver of staging, given the high costs and long lead in times. Deferring the detailed consideration of staging to the implementation plan provides time to undertake more detailed infrastructure investigations and planning for the growth areas identified in the FDS. This work should be completed to fully inform the staging strategy.

11.3.1.5 Disadvantages / Risks

- a) As outlined in the submissions from Waka Kotahi and MoE, providing no indication of staging in the FDS provides less certainty for these organisations as they undertake their own infrastructure planning. This risk would be mitigated by closely involving all infrastructure providers in the development of the implementation plan and associated staging plan.

11.3.2 Option 2: Detailed staging in the FDS

This option would include detailed staging in the FDS, similar to the approach taken to the 2019 FDS. This option is consistent with that sought by the Ministry of Education, Waka Kotahi and Kāinga Ora in their submissions. Following the Hearing, Kāinga Ora acknowledged the limitations of this option and agreed that broad directives to guide a future staging strategy may be appropriate.

The only other growth strategy that we are of aware of that includes detailed staging is the Auckland Future Urban Land Supply Strategy (2017).

The advantages and disadvantages of this option is outlined below.

11.3.2.6 Advantages

- a) Provides certainty for the community, landowners and infrastructure providers now about where and when development will occur. It allows the Councils to illustrate now how a balance of intensification and greenfield opportunities can be realised over time.
- b) Allows for infrastructure planning and rezoning for high priority areas to follow quickly once the FDS is adopted.

11.3.2.7 Disadvantages

- a) Recent experience in Tasman and Auckland show that staging plans quickly become out of date. In Tasman, growth areas have been brought forward to meet stronger than expected demand. The opposite situation has occurred in Auckland, where the Council has not released land for development in line with its staging plan. The role of the FDS is to inform RMA planning documents, LTPs and RLTPs (see clause 3.17 of the NPSUD). Limited weight may be afforded to staging in an FDS if it can be demonstrated that its contents are out of date. Recent decisions on greenfield Plan Changes in Auckland are a good example of this.
- b) The NPSUD requires the Councils to be responsive to developments that are unanticipated or out of sequence with planned land release. Being responsive in this context, requires a nimble strategic planning framework that can set clear direction for future growth, while being adaptable to changing circumstances and new information. In our view, prescribing detailed staging in the FDS would be contrary to this intent.

11.3.3 Option 3: High level staging guidance in the FDS

This option would involve providing more guidance in the implementation section of the FDS that would inform the preparation of a staging strategy as part of the implementation plan. This guidance would link back to FDS outcomes and could expand on those where they are relevant to staging. Relevant matters to consider in a balanced and holistic way, could include:

- Prioritising Council planning and infrastructure investment within existing urban areas (to link with Outcomes 1, 2 and 3);
- Being informed by market conditions, including house prices and near term demand projections (Outcome 5);
- Ensuring that a range of housing choices are provided overall that meets needs (Outcome 4);

- Prioritising investment in areas that are cost effective to service for ratepayers (Outcome 6).

Examples of this approach across New Zealand vary, with some indicating broad spatial priorities. This includes the Kāpiti Growth Strategy 2022, Hamilton Future Proof 2021 and Tauranga/Western Bay Smart Growth 2021 (draft).

11.3.3.8 Advantages & Disadvantages

- This option has the same advantages and disadvantages as Option 1. However, an additional advantage includes providing more strategic guidance to future implementation processes, that would address some of the uncertainty raised by the submitters on this issue. Providing a linkage with the FDS outcomes in the guidance, allows greater certainty that the intent of the FDS will be met through future Councils actions.

11.3.4 Recommended Changes to the draft FDS

Option 3 is recommended. This provides additional guidance on how the implementation plan and staging should be developed, while providing flexibility to monitor and review the staging in response to market conditions and new information. An additional change would be to clarify the process for developing the implementation plan, including that infrastructure providers would be consulted during its preparation.

12.0 Other implementation recommendations

Section 11 of the draft FDS includes a table of actions that will **form a framework for the implementation plan**. These are intended to guide the development of the subsequent implementation plan and is not exhaustive. These are grouped into monitoring and review, strategic alignment and funding, supporting infrastructure, providing greenfield opportunities and partnerships. These are operational areas and there are opportunities to refine and add to these to align with the FDS outcomes/objectives. Below is a list of potential additional actions that could be captured in the final FDS in response to submissions:

- Work with central Government (MoT, Waka Kotahi) on a joint model for monitoring VKTs in Nelson Tasman in line with the Emissions Reduction Plan targets and requirements;
- Add further detail to the action on affordable housing, referencing the different tools available and the types of affordable housing. Potential to review these measures jointly with the Councils through a housing affordability strategy or similar that focusses on measures other than land supply;
- Update the Councils open space policies to support integrated open space network planning and policies that guide the provision of new open space. This will be important part of delivering the public facilities necessary to support intensification. This could be developed jointly by the Councils for the combined urban area

As part of the implementation plan, we recommend refining and detailing the actions in the FDS and developing a series of key performance indicators and measures to monitor success. This would link to the FDS outcomes/objectives.

Appendix 1

Review of Selected Submissions (Kirdan Lees, Sense Partners)





SENSE PARTNERS

DATA LOGIC ACTION

Thursday 26 May 2022

From: Kirdan Lees (Sense Partners)

To: Rachel Morgan (Barker and Associates)

Review of selected submissions on Nelson-Tasman Future Development Strategy

Rachel,

As requested, please find attached an updated memo in response to the recent workshop.

This memo attaches the relevant comparison between today's population and previous forecasts for Nelson.

Thanks, and best regards,

Dr Kirdan Lees

Partner

Sense Partners

021 264 7336

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Review of selected submissions on the Nelson-Tasman Future Development Strategy

Report to Nelson City Council
Amended, 26 May 2022



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1. Objectives and constraints

Objectives

The Nelson-Tasman FDS sets out a high-level plan of where growth is expected to occur. The purpose of the FDS is:

- a) to promote long-term strategic planning by setting out how a local authority intends to:
 - i. achieve well-functioning urban environments in its existing and future urban areas; and
 - ii. provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and
- b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.¹

The plan is consistent with the objectives of the NPS-UD. Several objectives are relevant to fulfil direction under the NPS-UD. Crucially, the plan needs to support objective 2 of the NPS-UD.² That makes clear policies need to support the operation of competitive land markets:

“Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.”

Relaxing land use regulations on existing brownfields sites promotes intensification, helping to lift competition in land and development markets. But restricting greenfield development inhibits competitive markets.

Some submissions (Nelson-Tasman 2050, Property Economics, Fraser Cosgrove) miss this point. For example, PE state:

“Overall, the outcome of the Nelson / Tasman FDS seems to contradict its objective of consolidation”. p5, Property Economics

Such an objective – on its own – contradicts objective 2 of the NPS-UD.³ Competition is beneficial to help reduce the cost of housing:

“Competition is important for land and development markets because supply will meet demand at a lower price when there is competition. There are several key features of a competitive land and development market. These include providing plenty of opportunities for development. Planning can impact on the competitiveness

¹ See NPS-UD 2020

² See page 10, <https://environment.govt.nz/assets/Publications/Files/AA-Gazetted-NPSUD-17.07.2020-pdf.pdf>

³ A clue to the overarching objective is simply in the title of recent land use regulation that received bi-partisan support, that is, the Enabling housing Supply and Other Matters Act 2021.



of the market by reducing overall opportunities for development and restricting development rights to only a few landowners.”⁴

So, it is perhaps surprising that submissions do not consider more fully the impact of the FDS on competition that can enable better outcomes for housing and land markets. This understanding is critical and missed by the Property Economics note.

Sequencing

The submissions also want the FDS to consider sequencing, suggesting development should be deferred until intensification takes places closer to established sites with Nelson and Tasman.

But the requirement to consider sequencing has been removed from the NPS-UD. Instead, the FDS needs to respond to market dynamics, including out-of-sequence private planning changes as instructed under the NPS-UD.⁵

It's not that sequencing doesn't matter. Rather, the right place to consider the impact of timing on infrastructure is via annual implementation plans, jointly prepared by both councils, that execute the FDS. The draft FDS notes:

“The draft NTFDS does not include sequencing of timing for when growth areas will be rolled out over the next 30 years, given the need to be responsive to changing market dynamics in the NPS-UD 2020. This is one of the differences between the NPS-UDC and the NPS-UD.” (See paragraph 4.38 in section 7 of the draft FDS).

This is based on policy 8 of the NPS-UD:

“Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning environments, even if the development capacity is unanticipated by RMA planning documents, or out-of-sequence with planned land release.”⁶

Thus the FPS needs to allow for market dynamics, including as instructed under the NPS-UD.

This is different to the NPS-UDC that specifies:

“Local authorities shall produce a future development strategy which demonstrates that there will be sufficient, feasible development capacity in the medium and long term.” – (PC12)

⁴ See NPS-UDC

⁵ See Ministry for the Environment 2020, Appendix 1 which states that timing and sequencing has been removed in the NPS-UD. The clause PC13: that required the FDS to “balance the certainty regarding the provision of future urban development with the need to be responsive to demand for such development”.

⁶ This requires councils to form a view on the significance of development capacity that the NTFDS captures within the multi-criteria analysis that weights significance of added capacity.



Constraints

Both the Kainga Ora submission and the Nelson-Tasman 2050 submission, include references to highly productive land, for example:

“Section 5 of the FDS on climate change⁶ and Section 6 “Outcomes”⁷ are correctly reflecting the objectives of governmental directives (NPS UD, Government Policy Statement on Land Transport (GPS LT), National Policy Statement on Highly Productive Land (NPS HPL) and Zero Carbon Act), which the FDS is supposed to give effect to.” Nelson-Tasman 2050, p5

But any National Policy Statement on Highly Productive Land is not done. So, it is surprising that Kainga Ora is so directive:

“The Council with need to have regard to this NPS as it defines the areas for urban growth in the Region.” Page 10 Kainga Ora.

There are many criticisms of the proposed NPS-HPL. For example, New Zealand Treasury are highly critical:

“The NPS-HPL’s aim to increase protections on productive land is likely to work against the goal of housing affordability set by the Government in its Urban Growth Agenda (UGA). As a result of the NPS-HPL the supply of urban land is likely to be further restricted overall for three reasons:

1. councils are likely to increase protections including by more than is intended
2. the NPS-HPL may create more regulatory uncertainty for property developers
3. and it will increase consideration performed by councils before effect is given to any policy with the intent of freeing up land for housing development.

“The Treasury consider the NPS has a weak problem definition and rationale for intervention”.⁷

Given the NPS-HPL is not done,⁸ and the points raised against the NPS-HPL, councils are not required to consider Highly Productive Land in the FDS.

Impacts of releasing Greenfields land

Previous work for Tasman District identified poor outcomes in terms of housing affordability.⁹

Even with signs of easing in the price of existing housing, house prices in Tasman District increased 120 percent in the seven years to March 2022.

⁷ See Official Information Response 20190547,
<https://www.treasury.govt.nz/sites/default/files/2019-09/oia-20190547.pdf>

⁸ The link provided on the timing of any NPS-HPL provided in the KO report appears broken.⁸

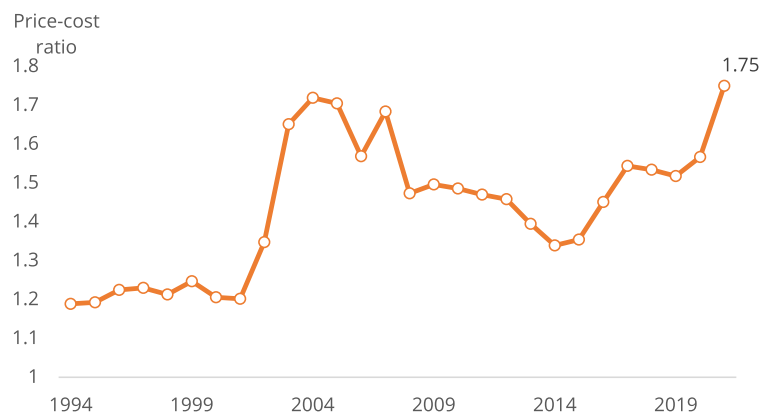
⁹ See Sense Partners 2019, “Understanding the impacts of releasing greenfield sites for development”, Report for Tasman District Council 2019.



It's not just housing. Rents are up 14 percent in two years. And the house price to income ratio suggests housing is unaffordable in Tasman and Nelson relative to other parts of New Zealand.

Increases in land prices have outstripped house prices – a signal that land is undersupplied across the district. And house prices have disconnected with the cost of housing: the price-cost indicator - recommended by HUD as a key indicator – of a lack of competitiveness in local housing markets, has pushed higher suggesting a stressed market (see Figure 1). This squares with indicators of market ownership that show greenfield land in the Nelson-Tasman land area is more concentrated than many other New Zealand regions, reducing competition in land and development markets.

Figure 1 Wedge between house prices and construction costs has never been higher
Price of housing relative to the cost of constructing new houses



Source: HUD

Objective 2 of the NPS-UD is to support competitive land and development markets. One approach to meeting this objective is to increase the size of the market for land by adding more greenfield land to make it more difficult for developers to capture market share

Releasing Greenfields land reduces the cost of land, reduces the cost of housing predominantly by increasing the supply of housing in greenfield areas within the region.

These houses are likely to be new. The cost of constructing a new home mean that these homes are unlikely to be affordable. But these new homes meet demand from elsewhere in the shared urban areas, easing demand – and reducing prices – on the existing stock of houses.

One submission (Fraser Cosgrove) appears to read this report as suggesting releasing Greenfields land would increase intensification across the shared urban area. It will not. But the price of brownfields land will also fall. So depending on the idiosyncratic preferences and needs of firms and households, it would be wrong to expect no new development in brownfields areas after releasing Greenfields land. Instead, some new development will lead to intensification of specific brownfields sites over time.



2. Growth projections

One submission (Nelson-Tasman 2050) questions the population growth projections that form the demand side of the housing demand projections. The (Nelson-Tasman 2050) submission points to a note in Principal Economics review of the Nelson and Tasman HBAs that notes the population growth rates across the combined urban area are different, with Tasman growing more quickly than Nelson.

But this is easily refuted. Tasman's population has grown more quickly than Nelson's population over the past twenty years. Growth in many local councils has proceeded more quickly than shared urban areas.¹⁰

These projections also originate in the Housing and Business Assessment. The Principal Economics assessment is very clear:

“Overall, the HBA provides a comprehensive assessment and meets the requirements of the NPS-UD 2020. The HBA provides an appropriate structure, with useful information on demand and supply. The HBA's capacity assessment is consistent with the NPS-UD guidelines.” P3, Principal Economics 2021

The (Nelson-Tasman 2050) submission argues that the population data that supports the demand side of the housing and business assessment has a flawed methodology.¹¹

The claim is made that population projections are simply extrapolations of past growth. But these population projects are comprised of demographic assumptions about mortality, fertility, and net migration. These variables are driven by a range of factors, including the ageing of New Zealand's population. Moreover, the projections are consistent with a modest easing of the rapid growth Nelson and Tasman in particular, has experienced in recent years.

To place these projections in context, Statistics New Zealand released subnational projections in the first quarter of 2021 – the first release in four years.

These projections show the population projection used by Nelson City Council is close to the high projection by the end of the forecast horizon (see Figure 2).

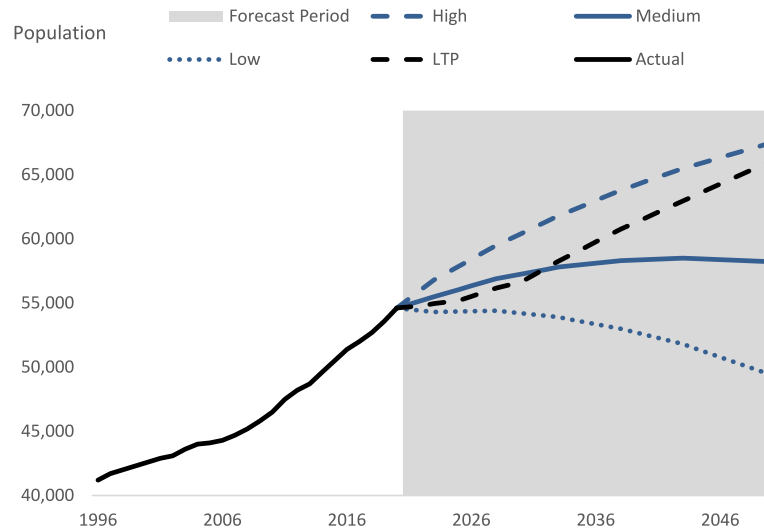
Like other councils, Tasman District Council has adopted a forecast close to Statistics New Zealand's high projection (see Figure 3).

¹⁰ See for example, population growth in Featherston, South Wairarapa, Masterton and Lower Hutt that has outstripped population growth for Wellington Council in recent years.

¹¹ See page 7, (Nelson-Tasman 2050).

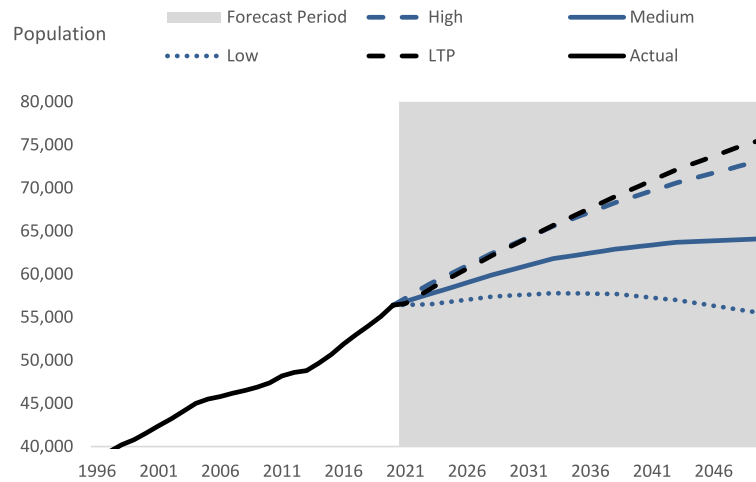


Figure 2 Nelson's LTP forecast is close to Statistics New Zealand high forecast by 2050
Population forecast comparison Statistics New Zealand vs Long-term Plan: Nelson



Nelson's population growth was flat between June 2020 and June 2021, consistent with the FDS population projection.

Figure 3 Tasman's LTP forecast is close to Statistics New Zealand's high forecast
Population forecast comparison Statistics New Zealand vs Long-term Plan: Tasman





Recent population data for 2021 shows strong population growth despite border closures that set inward migration essentially to zero. Tasman's population grew 5.5% in the two years to June 2021 – strong growth consistent with the FDS forecast.

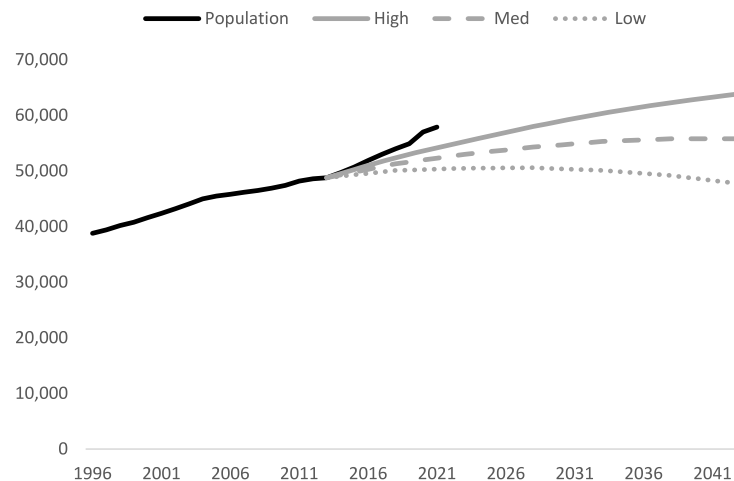
Recent data suggests FDS projections are reasonable

Unfortunately, Statistics New Zealand does not attach a likelihood to each of the low, medium and high population projections. The projections merely reflect choices on underlying parameters that results in low, medium, or high population projections.

To test the reasonableness of the FDS population projection it is useful to show actual population relative to recent population growth.

The last set of projections produced by Statistics New Zealand four years prior in 2017 suggested councils should expect low growth. Figure 4 shows Tasman's population today far outstrips Statistics New Zealand's high projection.

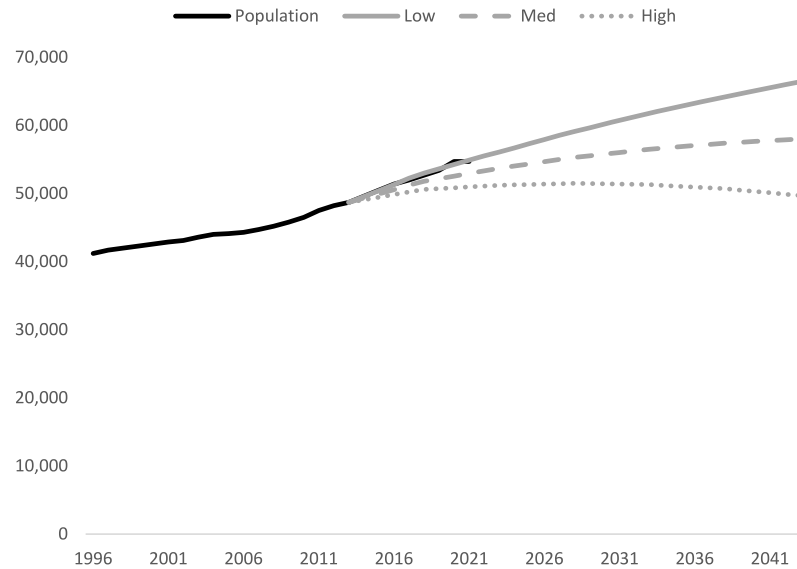
Figure 4 Tasman's population today outstrips Statistics New Zealand's '17 high projection
Population forecast comparison Statistics New Zealand vs Long-term Plan: Tasman



Even in 2043, the medium projection does not reach today's population in Tasman. This suggests adopting a forecast close to a medium projection would generate substantial risks to the Future Development Strategy. Figure 5 shows Nelson's current population lies on the previous high projection from Statistics New Zealand.



Figure 5 Nelson's population today lies on Statistics New Zealand's '17 high projection
Population forecast comparison Statistics New Zealand vs Long-term Plan: Nelson





3. Intensification

Several of the submissions suggest the FDS has not considered opportunities to intensify urban form.

This is not true. The Nelson-Tasman draft FDS proceeds in 5 clear stages that explicitly weight opportunities for intensification higher than greenfield development, everything else equal.

Construction of the FDS

Stage 1 – Strategic opportunities and constraints

Stage 1 addresses sites identified as opportunities for development for either housing or business land. These opportunities are sensibly identified from the previous FDS from 2019 and from engagement with the developer community, local landowners and residents who had the opportunity to propose sites.

Some 148 sites in Tasman and 41 in Nelson are identified as potential opportunities. My assessment is that a broad range of sites are identified as candidate sites for development. Looking through the GIS viewer, I cannot identify large sites that are not present.

The FDS process then steps through constraints on development including from natural hazards, landscape, the natural environment, culturally sensitive sites, and infrastructure. Gap analysis presented in table 2 on page 24 of the draft FDS suggests data supports a more fulsome and up-to-date treatment of some constraints than others. For example, Nelson provides slope instability data across the district while Tasman District Council provides a more limited dataset.

However, given the location of candidate sites for development the paucity of data for some aspects of natural hazards identification appears less material than for other regions.

Accessibility of sites is also thoroughly mapped across different transport modes and to a variety of destinations, spanning access to daily needs, jobs, schools, and other amenities, for each candidate location. This information is then summarised to a five-point scale. This data heavy analysis is sophisticated and helps support the FDS assessment.

Stage 2 – Analyse opportunities, develop spatial strategies, test with stakeholders

Stage 2 refined the methodology for site assessment that include the multi-criteria framework that was subsequently applied to many sites.

Multi-criteria analysis is a standard tool used to develop Future Development Strategies across many councils. The analysis within the draft FDS is consistent with approaches taken at other councils. The analysis is transparent, clearly setting out:

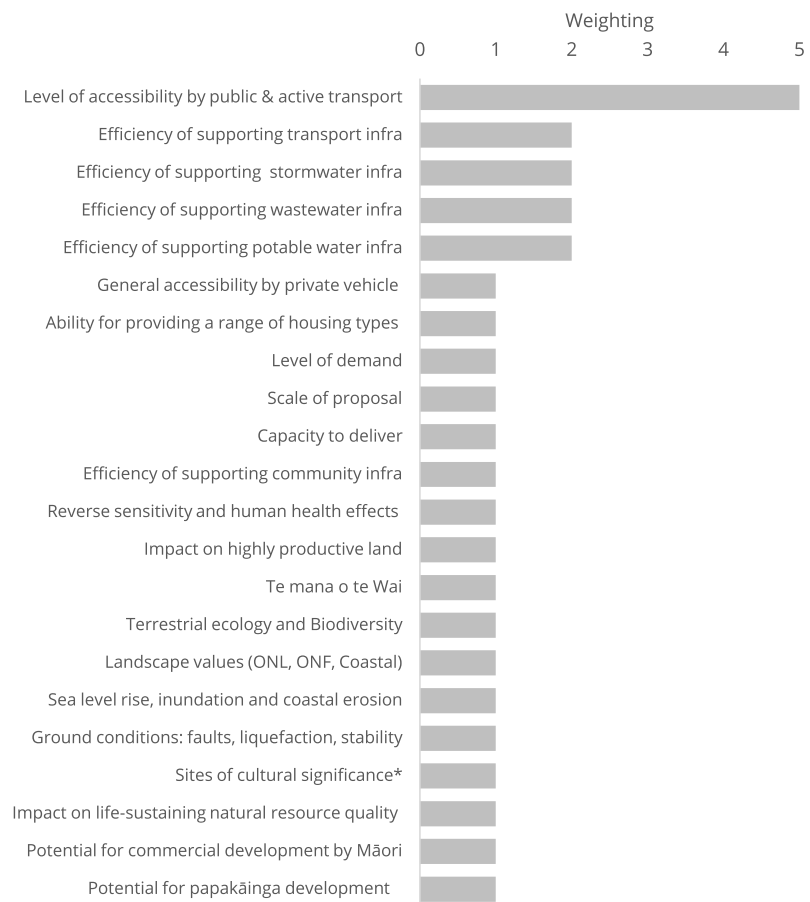
- I. the criteria for assessment,
- II. the weighting of each criterion
- III. the assessment of each development opportunity.



Many submissions point to the lack of access to potential development at the Maitai Valley candidate sites. But accessibility by public and active transport modes takes the highest weight in the multi-criteria analysis.

Submission also criticise the FDS for not putting weight on the weaker accessibility options of Greenfields development. But the multi-criteria analysis puts substantive weight on both lack of access to public and active transport modes and efficiency of infrastructure relative to other criteria (see Figure 6). It also places higher weights on this criterion than other MCA criteria in place at other councils (see for example the Housing and Business Assessment for Wellington City Council 2019 and Rotorua Lakes Council).¹²

Figure 6: Weighting of criteria for MCA analysis of candidate development sites



¹² See Wellington City Council 2019 and Market Economics 2021.



Stage 3 – Assess sites and draft recommended spatial strategies

This stage of the FDS refines site assessments and develops the spatial strategy and where development is expected to occur.

Stage 4 – Refine growth areas

Stage 4 of the FDS looks to refine the spatial scenarios. This work includes adding additional details on infrastructure and transport routes. Many submissions point to a lack of detail on transport routes. But active and public transport is included as a key criterion in the MCA analysis. And the draft FDS sets out what is possible to know at this point ahead of take up in development capacity. Indeed, it is a requirement of the NPS-UD that the FDS identifies spatially the infrastructure needed to support future development.

The spatial scenario captured in the core proposal includes additional public transport in the existing urban area and to the south and acknowledges the need for significant new infrastructure investment.

Refinements of the spatial scenario can help the FDS mitigate and adapt to climate change. Mitigating greenhouse gas emissions is assisted by locating much new development close to the current urban form and existing transport links. Adaption is addressed via planning for flood risk that is well documented in the draft FDS.

Both councils plan significant public consultation at this stage for the draft FDS.

Stage 5 – Updating the FDS based on submissions

A final stage will then allow for revision to the FDS based on public submissions.

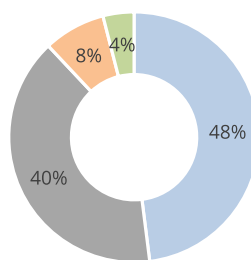
Contrary to many of the submissions, I find little to suggest the draft FDS is not fit-for-purpose. The document is a sound basis for planning purposes in the region.

The FDS multi-criteria analysis identifies many sites for intensification

Figure 7 shows that much of the new capacity identified under the FDS is intensification.

Figure 7: About half of the new housing is intensification

■ Intensification ■ Greenfield ■ Other ■ Rural residential





This is not surprising. One of the criteria within the multi criteria analysis MCA relates to intensification.

But several of the submissions (Nelson-Tasman 2050, Fraser Cosgrove, Property Economics) suggest intensification of specific sites are likely to be higher than the 15 percent uptake rate assumed.

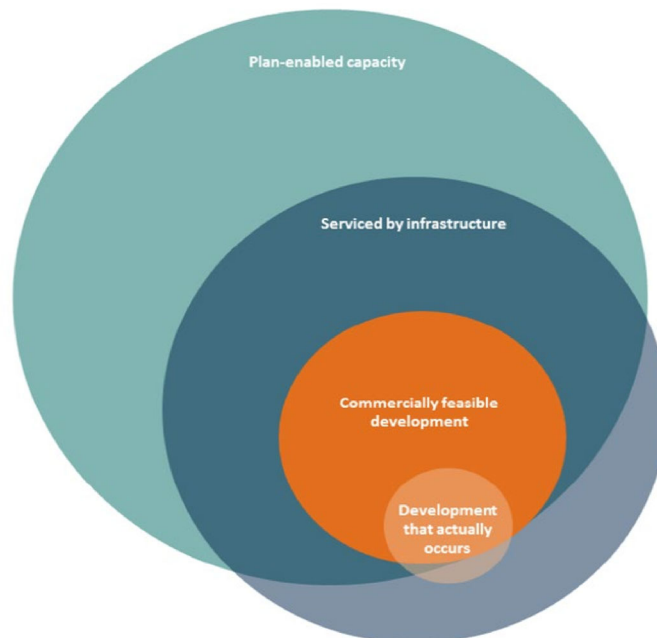
Uptake and intensification compared to other regions

How does this uptake rate for Nelson-Tasman compare with other jurisdictions?

First, it is important to distinguish the uptake rate applied to a specific site versus the rate of greenfield or brownfield development realised across the city.

To assess expected location of housing, councils' Housing and Business Assessments step through a stage process from plan-enabled capacity, through infrastructure-ready capacity to commercially feasible development to development that occurs (see Figure 8).

Figure 8 Councils' standard process from plan-enabled to realised development



Source: Greater Christchurch Partnership 2018

Several features impact on commercially feasible development including:

- land set aside for wastewater and stormwater
- constraints that limit net site area such as minimum net density and maximum net density



- time to develop
- fees and charges
- average sales prices in a location.

These features and many more are worked through as part and parcel of the Housing and Business Assessment.

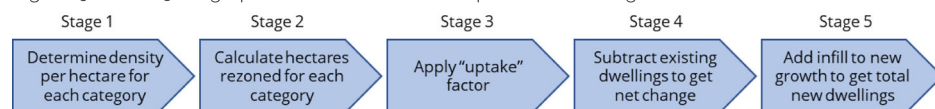
Rather than review that work line-by-line, it is informative to look to other regions to test the broad parameters and the projected ratio between greenfields and brownfields development. Housing markets will differ, so only broad indications of direction are possible rather than precise numbers. Using uptake rates that assume high rates of development risk higher land and house prices than using lower rates.

Comparisons with Wellington region

The councils within the Wellington region and Wellington City provide one comparison.

In 2020, Wellington City Council commissioned Beca to scope likely uptake and infill development in the outer suburbs. Beca proceeded by determining density per hectare for each new zone and then applied an uptake factor to each zone (see Figure 10).

Figure 9 Beca's 5-stage process assessed development in Wellington's outer suburbs



Source: Beca

This process requires uptake rates for each category. Figure 10 shows that the uptake rate applied for medium density development for 4 storeys was 14 percent and for 6 storeys was 14 percent, close to the 15 percent used in the Nelson-Tasman FDS.

Figure 10 Beca's uptake rate by development type

Category	Description	Density per hectare	Uptake
Category 2	Up to 3 storeys, medium density	55	29 percent
Category 3	Up to 4 storeys, medium density	100	14 percent
Category 4	Up to 6 storeys, medium density	130	14 percent
Category 5	Up to 8 storeys, medium density	400	8 percent

Source: Wellington Outer Suburbs assessment and evaluation

This approach gives different outcomes in terms of greenfield and brownfield development depending on density, amenity values and development potential (see Figure 11).



Figure 11 Projected infill as a percentage of new dwellings

Category	Potential new dwellings over next 30 years	Existing dwellings	Potential new dwellings	Infill dwellings	Infill % of new dwellings
Northern suburbs					
Tawa	2,067	4,618	1,880	187	9.05%
Churton Park	602	2,560	549	53	8.80%
Johnsonville	1,572	3,533	1,397	175	11.13%
Newlands	836	2,437	792	44	5.26%
Western suburbs					
Khandallah	1,489	3,129	1,062	426	28.61%
Ngaio	445	2,091	191	254	57.08%
Crofton Downs	162	637	137	25	15.43%
Karori	2,890	5,194	1,910	980	33.91%
Kelburn	457	1,349	328	129	28.23%
Southern and Eastern suburbs					
Brooklyn	1,071	2,331	1,011	60	5.60%
Haitaitai	577	1,886	390	187	32.41%
Kilbirnie	619	1,132	487	132	21.32%
Lyall Bay	301	1,108	255	46	15.28%
Island Bay	970	2,628	906	64	6.60%
Miramar	758	2,916	697	61	8.05%
Total	14,816	37,549	11,992	2,823	19.05%

At first glance, Figure 11 suggests the brownfields development rate (about half) across the Nelson-Tasman area might be difficult to achieve, but there are several mitigating factors:

- The MRDS is accommodative of growth
- The NPS-UD should be expected to have a significant impact
- Wellington's outer suburbs miss intensification that might be expected to occur closer to the CBD.



Other local councils within the broader Wellington region provide a point of comparison. Their earlier 2019 Housing and Business Assessment suggest only a small fraction of in-fill housing capacity is likely to be realised.

Comparisons with other cities

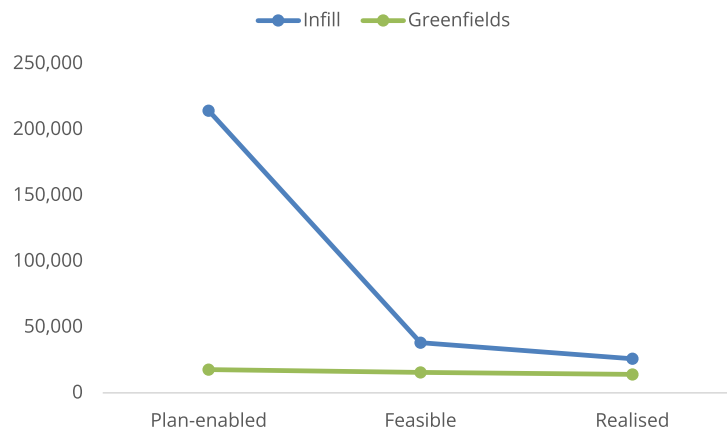
The Wellington region's earlier 2019 Housing and Business Assessment also provides a marker for the likely ratio between infill and greenfield development. At that point, total realised capacity across the region was 39,875 additional dwellings in the next thirty years with 17,635 dwellings (about 45 percent) expected to be greenfield development (see Figure 12).

Figure 12 Greenfield development from the Wellington region HBA 2019

Council	Plan-enabled	Feasible	Infill capacity	Realisation	Greenfield
Hutt City	41,240	5,476	39,030	4,473	2,210
Upper Hutt	18,306	3,830	15,488	3,509	2,818
Porirua	42,713	10,276	36,084	6,664	6,629
Kapiti Coast	23,135	6,052	19,785	4,935	3,350
Wellington	106,411	27,954	103,783	20,294	2,628
Total	231,805	53,588	214,170	39,875	17,635

Figure 13 shows the extent to which plan-enabled infill is feasible and ultimately realised relative to greenfield development.

Figure 13 Realised infill is a small fraction of plan-enabled infill



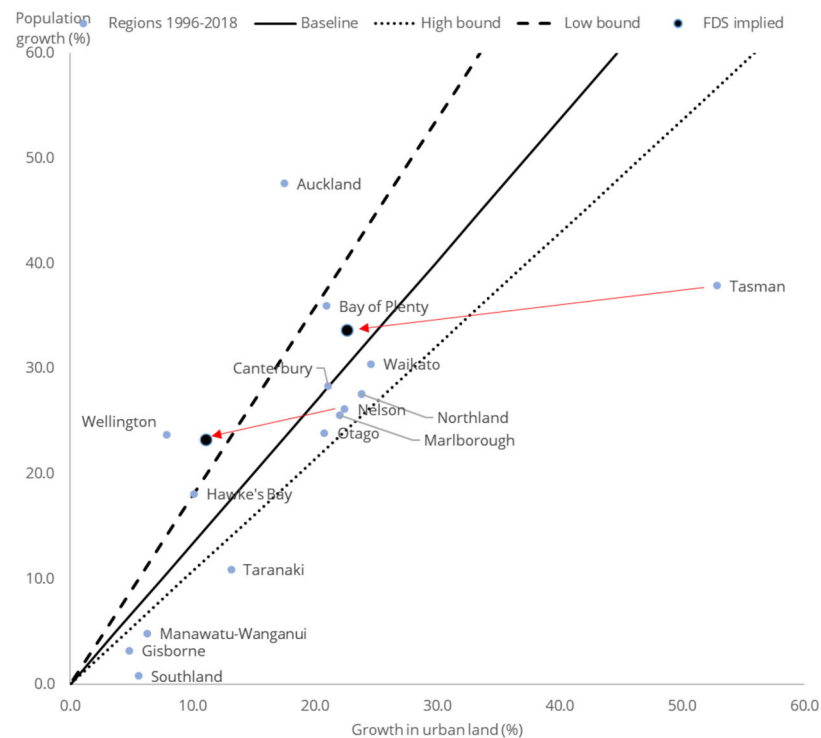


A final alternative is to consider the historic rate of growth in urban land for New Zealand's regions and compare these rates to the rates implied by the Nelson FDS. We use the LUCAS land use data base to calculate the growth in urban land for each region which we then compare to the population growth for each region over the period 1996-2018. These are the blue dots in Figure 14.

Then we run a regression to test the average land growth realised for population growth over the period 1996-2018. This is our baseline – the solid black line. We then provide a lower bound – two standard deviations lower than the black line and a higher bound – two standard deviations higher than the baseline.

We then add two important points – the growth in urban land implied by the draft FDS for Nelson and Tasman. These points show the implied growth in urban land is much lower than history. Rather than growing at historical rates of growth, urban land growth for Tasman is much curtailed – the draft FDS suggests a dramatic fall in land growth in the Tasman towards historical averages for each New Zealand region. For Nelson, a smaller fall in urban land growth is suggested. Urban land growth is expected to be much closer to the low rate of land growth observed for the Wellington region. Rather than simply extrapolating growth, this suggests a more compact urban form in the draft FDS that over this earlier period.

Figure 14 Councils' draft FDS proposes reducing land per person relative to history





References

Beca and Studio Pacific Architects 2020, Wellington Outer suburbs assessment and evaluation, for Wellington City Council
https://planningforgrowth.wellington.govt.nz/_data/assets/pdf_file/0026/13598/Assessment-and-Evaluation-of-Wellingtons-Outer-Suburbs-Report-Introduction.pdf

Future Development Strategies 2020", Ministry for the Environment:
<https://environment.govt.nz/assets/Publications/Files/FDS-Fact-sheet-updated.pdf>

Greater Christchurch Partnership 2018 "Housing and Business Development Capacity Assessment" March

Ministry for the Environment 2016, National Policy Statement on Urban Development Capacity,
https://environment.govt.nz/assets/Publications/Files/National_Policy_Statement_on_Urban_Development_Capacity_2016-final.pdf

Ministry for the Environment 2020, "National Policy Statement on Urban Development 2020", Ministry for the Environment: <https://environment.govt.nz/assets/Publications/Files/FDS-Fact-sheet-updated.pdf>

Sense Partners 2019, "Understanding the impacts of releasing Greenfields sites for development", report for Tasman District Council

Wellington City Council 2019, "Housing and Business Development Capacity Assessment" Wellington City Council, November.

Appendix 2

MCA and Revised Residential Capacity Calculations

Memorandum



To: Jacqui Deans and Chris Pawson – Tasman District Council and Nelson City Council

From: Cam Wallace – Barker & Associates Limited

Date: 25 May 2022

Re: Nelson Tasman FDS – MCA and revised residential capacity calculations

1.0 Introduction

The purpose of memo is to address various submission points which have focussed on the approach to assessment of sites using the MCA approach along within estimated residential capacity enabled within intensification areas identified within the Draft FDS.

In addition, this memo provides an assessment of the capacity implications of revisions to proposed FDS areas based on feedback received during public consultation, a summary of the assessment of new sites identified through submissions.

2.0 Level of Demand MCA Criteria

Criterion 4 of the MCA relates to “Level of Demand”. Several submissions have raised queries as to how this criterion was developed and applied as well as why some large greenfield areas were identified as having “low demand”.

To clarify, assessment against this criterion was only applied to identified residential intensification areas within the draft FDS rather than all sites considered. This criterion reflects Policy 5(b) of the National Policy Statement on Urban Development (“NPSUD”). This policy predominantly relates to the intensification requirements of the NPSUD. Assessment against this criterion drew on ratings data provided by both Council to understand both relative land prices (per m²) and the Land Value to Capital Value Ratio (“LV2CV”) of existing developed parcels. These measures are identified in *“Understanding and implementing intensification provisions for the National Policy Statement on Urban Development”* prepared by the Ministry for the Environment (“MfE”). As greenfield development areas within the FDS are largely undeveloped, and in many cases not zoned for urban development, this invariably leads to low relative land prices (per m²) and a high LV2CV as these sites feature limited / no capital improvements. As such, all greenfield sites would likely score identically under the chosen metrics. In light of the general strategy towards seeking to maximise intensification opportunities, it was therefore considered more appropriate to focus the assessment of Criterion 4 on intensification areas only, effectively acting as a bonus criterion. Sites that scored well under Criterion 4 should be prioritised for greater levels of intensification. To avoid confusion, this criterion would be better named “Level of Demand for Intensification”.

It is important to note that the assessment of land prices and capital values has been undertaken at a fixed point in time. In reality, these are dynamic figures which fluctuate depending on local market conditions including how enabling the District Plan framework is for development. In this regard, any measures that remove barriers to development (e.g. increased building heights) will likely increase land prices altering the LV2CV and improve feasibility for redevelopment.

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3.0 Capacity

3.1 Intensification Uptake Rate

A number of submissions have challenged the validity of the 15% uptake rate used to help calculate capacity for areas of intensification and infill development within the FDS. Long-range forecasts around the amount of housing that may be delivered via intensification are challenging as set by the original memo provided by Sense Partners.

To help respond to these, additional sensitivity testing looking at the impact of various uptake rates within intensification areas has been undertaken. Further analysis has also been undertaken looking at recent levels of intensification and uptake within Tasman's Richmond Intensive Development Area ("RIDA") over the past 5-years and within Nelson's existing Residential – Higher Density Area ("HDA") over the past 3-years.

This additional analysis is complimentary to Sense Partners "Review of selected submissions on Nelson-Tasman Future Development Strategy" dated 9 May 2022.

3.1.1 Limitations

From the outset, it is also important to acknowledge that feasible capacity modelling (which provides an understanding of the likely uptake rate intensification opportunities) is typically informed with an understanding of more detailed district plan standards at the time a district plan change or review is advanced. Standards such as permitted heights, building coverage, interface controls (e.g. yards or recession planes) all impact on the amount of new floor space that can be realised on any given site and therefore the overall feasibility of intensification. Feasibility will also be partially dependent on when any plan changes or reviews for greater levels of intensification are advanced.

Capacity within the Draft FDS is based on high-level density assumptions which generally exceed what is currently enabled under either Council's Resource Management Plans, and there a wide range of other external factors which will ultimately impact on the uptake of intensification opportunities (e.g. interest rates). As such, the capacity calculations (including uptake rate) are intended to provide a high-level overview of what could be anticipated over the life of the FDS. Ultimately, further economic analysis will be required to inform planning standards, including the extent of zones, to understand the implications of more enabling planning.

3.1.2 Sensitivity Testing

In response to submissions questioning the validity of the 15% uptake rate (i.e. 15% of suitable sites will be intensified over a 30 year period) over a 30 year period used to inform capacity figures within the Draft FDS, sensitivity testing of various rates of uptake was undertaken to get an understand of what this may mean for achievable (and realistic) capacity.

Uptake rates of between 5% and 35% (at 5% intervals) were applied to FDS intensification and broader infill areas to understand the potential of intensification in contributing to the 24,000 high growth housing target. In addition, the capacity within each intensification areas was tested against all Intensification Typologies proposed within the Draft FDS (i.e. all intensification areas would enable six storey residential development).

This testing indicated that to achieve the required housing targets through intensification only, that between 30 to 35% of all sites where residential is enabled (e.g. residential zones and commercial centres)

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would be required to be redeveloped over the next 30-years. This intensification would also need to utilise development opportunities towards the theoretical maximum that has been assumed.

A summary of the capacities possible under different uptake scenarios is presented below in Table 1 below.

Table 1: Potential dwelling capacity within FDS Intensification Areas based on different uptake rates

Uptake %	FDS Areas	Infill Areas	Total
5	2,535	1,783	4,318
10	4,579	3,567	8,146
15	6,623	5,250	11,873
20	8,668	7,134	15,802
25	10,712	8,918	19,630
30	12,756	10,702	23,458
35	14,800	12,486	27,286

In addition to the above, a further sensitivity test on varying intensification uptake by typology and location was undertaken as well as by decade.

Varied Uptake by Typology

Under the first test, the uptake rate of FDS areas highlighted for medium-density housing (the I4 Typology) was increased to 20%. Uptake in the residential infill areas was retained at 15%. This covers the majority of the balance of the urban environment in areas that are not as accessible as the FDS areas. Intensification areas which relied on more intensive forms of development such as multi-storey apartment buildings and those in the smaller Tasman towns of Wakefield, Brightwater and Motueka was reduced to 10%. The reduction to 10% in these areas is intended to reflect the increased build costs, complexity and capacity within the Nelson Tasman area to deliver multi-storey apartment projects. This is consistent with the approach undertaken by Wellington

Under this test, increasing the uptake rate for medium-density intensification areas and reducing it for high density intensification areas yielded an additional 446 dwellings (7,069 dwellings vs 6,623 dwellings). This would represent 1.9% of the 24,000 new dwellings identified as being required under a high-growth scenario.

Varied Uptake by Decade

At the request of the Joint Sub-committee, a further test was undertaken applying varying uptake rates by decade over the life of the FDS to the intensification areas. This is intended to reflect increased acceptance of more intensive forms of living as it becomes more common within the urban environment as well as increased capacity in the local development industry to deliver more intensive developments. These uptake rates were also varied by typology consistent with the approach above and the variations identified in Figure 9 of the Sense Partners review dated 9 May 2022.

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Two varying uptake scenarios were tested as follows:

- Scenario 1:
 - For medium density typologies (I4 and I5), uptake rates of 15%, 17.5% and 20% across decades 1-3 respectively.
 - For high density/ mixed-use typologies (I1, I2 and I3), uptake rates of 5%, 10% and 15% across decades 1-3 respectively.
- Scenario 2:
 - For medium density typologies (I4 and I5), uptake rates of 15%, 20% and 25% across decades 1-3 respectively.
 - For high density/ mixed-use typologies (I1, I2 and I3), uptake rates of 10%, 15% and 20% across decades 1-3 respectively.

The results of this additional testing are provided in Table 2 overleaf. These capacities include all identified intensification areas within the Draft FDS (excluding those subjects to the DAPP in Nelson and N-102 Roto Street which is proposed to be removed). The broader infill areas are not included in the capacity below as these are less well suited to delivering larger-scale, comprehensive redevelopment than the intensification areas.

Scenario 1 above would provide for approximately the same amount of capacity within the intensification areas as the 15% flat uptake rate scenario used to inform the FDS.

Scenario 2 would provide for an additional 1,734 dwellings or 7.2% of the new dwellings required under the high-growth population scenario. However, the majority of this increase (1,112 dwellings or 64%) would be expected to be realised in the third decade post 2042. As such, we are of the opinion that the 15% uptake averaged over the 30-year duration of the FDS remains an appropriate measure on which to base capacity that could be realised by intensification areas in the FDS. If during regular monitoring, intensification uptake rates are tracking closer to these higher scenarios this would reduce the need to release/ enable greenfield sites also identified within the FDS.

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Table 2: Potential dwelling capacity within FDS Intensification Areas based on different uptake rates by decade and typology

Typology/ Scenario		Decade 1	Decade 2	Decade 3	Total Capacity
Medium Density (MD) Typologies	Scenario 1	1,578	1,800	2,022	5,400
	Scenario 2	1,578	2,022	2,467	6,067
High Density/ Mixed-use (HD-MU) Typologies	Scenario 1	267	490	713	1,470
	Scenario 2	490	713	936	2,139
Combined MD/ HD-MU Typologies	Scenario 1	1,844	2,290	2,735	6,870
	Scenario 2	2,068	2,735	3,403	8,206
MD	Draft FDS Reference Case (15% flat rate)	1,578	1,578	1,578	4,734
HD/ MU		713	713	713	2,139
Combined MD/ HD-MU Typologies		2,291	2,291	2,291	6,873

3.1.3 Nelson HDA

Within the HDA (excluding the HDA within the greenfield development in Marsden and Ngawhatu valleys), between March 2017 and July 2020 a total of 30 sites obtained resource consent for redevelopment. However, these 30 sites yielded only an additional 25 dwellings. The HDA extends across five FDS intensification areas: N-016 Neale Park, N-019 Nile St East, N-108 City Centre North, N-109 Wood South and N-110 Wood North. Adopting the same methodology for identifying sites suitable for intensification within the Draft FDS, the HDA comprised a total of 932 sites.

The 30 sites would be equivalent to 3% of suitable sites within the HDA. Extrapolated out to a 30-year time horizon this would represent 29% of sites coming forward for redevelopment. However, this is balanced against the low number of additional dwellings these sites contributed. All sites which added additional capacity only added one further dwelling per site indicating that only infill development was occurring rather than more comprehensive redevelopment and intensification. Development at this rate would yield

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an additional 225 dwellings over a 30-year time horizon. This would represent approximately half of the anticipated yield within this area as set out in the Draft FDS and would be equivalent to an uptake rate of around 7.5%. However, it is noted that the level of development enabled within the HDA is less than that anticipated within the various intensification areas included within the Draft FDS. As such, increased new capacity on these sites closer to the 15% assumed could be expected to occur.

3.1.4 Tasman RIDA

Within the RIDA, between late 2016 and June 2021 a total of 26 sites were redeveloped resulting in 52 additional dwellings being created. Of these, 20 sites were brought post the RIDA being fully operative in late 2018 while 6 were brought forward after it was initially notified and going through the plan change process. Adopting the same methodology for identifying sites suitable for intensification within the Draft FDS, the RIDA comprised a total of 1,066 sites.

The 20 sites are equivalent to 1.9% of suitable sites within the RIDA, whilst the 26 sites would represent 2.4% of all suitable sites. Extrapolated out to a 30-year time horizon this would represent 14.6% and 13.1% of sites coming forward for intensification respectively. In terms of the impact these areas have on total capacity, a simple extrapolation of new dwellings out over a 30-year time horizon would provide for approximately 53% of the dwelling increases assumed for the Draft FDS. However, it is noted that the level of development enabled within the RIDA is less than that anticipated within the FDS.

3.1.5 Summary

The 15% uptake rate assumption is broadly consistent with observed trends within both the HDA and RIDA for sites coming forward for redevelopment with both delivering levels of intensification required to meet the capacity assumptions which have underpinned the Draft FDS. It is also generally well aligned with uptake rates modelled or adopted by other local authorities as set out in the Sense Partners memo dated 9 May 2022. Kāinga Ora's economic consultants, Property Economics, have also noted that the 15% is realistic (albeit at the lower, more conservative range of what they consider for potential development).

The Draft FDS assumes significantly greater levels of intensification would need to be delivered (and realized) than is currently enabled (e.g. 5-storey apartment buildings vs a new duplex unit) and in the case of the Tasman towns, in more geographical areas than are currently enabled. These changes are still required to go through a plan change process and would be subject to a standard hearing/ appeals process and are therefore still some time away from being operative. As such, a conservative uptake rate of 15% is considered appropriate at this stage.

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3.2 Capacity Calculations

Capacity calculations have been re-run based on a number of factors, including:

- Amendments to site areas and/ or development typologies based on submissions received;
- Removal of areas subject to significant development constraints (e.g. Tahunanui Slump and the 55dBA Aircraft Noise Area);
- Amendments to density assumptions for Richmond Town Centre; and
- Data errors or misclassifications identified post public consultation of the Draft FDS.

3.2.1 Residential Infill Areas

Key changes from the Draft FDS include a reduction of dwellings accounted for via residential infill development from 5,351 to 5,241. This includes:

- The loss of approximately 220 dwellings within the Tahunanui Slump;
- An additional 100 dwellings identified as being possible within Richmond Town Centre using the I1 Intensification density assumption (six storeys) of 104dph (this is equivalent to 125dph less all ground floor spaces being retained for commercial uses); and
- Removal of residential infill areas accidentally included within some rural towns within Tasman including Tasman Village, Kaiteriteri, Upper Takaka, and Lower Moutere.

3.2.2 Nelson areas subject to significant natural hazard risk

In terms of intensification areas, calculated capacities for N-16 Neale Park, N-17 Vanguard St, N-18 Gloucester St, and N-110 Wood North have been removed from the revised calculations as these are the main areas subject to significant flooding/ coastal inundation risks and their capacity was never required to meet the high growth scenario target subject to consideration of submissions and any changes to overall calculations. Overall capacity calculations indicate that we are still able to meet the high growth target without these. This results in a reduction in intensification capacity by approximately 350 dwellings. They are proposed to remain as FDS areas with the caveat that they are subject to the DAPP.

It is also proposed to remove N-102 Roto Street in its entirety due to risks of coastal inundation as well as the removal of sites subject to the 55dBA airport noise contour. This would result in a further reduction of 100 dwellings to overall capacity numbers.

3.2.3 Intensification Areas

T-115 Berryfields Crossing, Richmond has been reclassified under the intensification typology (away from Greenfield) noting that this area is already zoned and the development proposes to intensify what is otherwise enabled under existing planning controls. This results in a change of 100 dwellings between greenfield development to intensification. T-206 Hickmott Place, Motueka has also been added providing for an additional 30 dwellings in Motueka.

In terms of Nelson intensification areas, some amendments have been made to several of the mixed-use intensification areas. The original methodology had assumed all sites within these areas would include some form of ground floor residential. On reflection, as these areas are very broad in scale and incorporate existing residential areas away from major movement corridors where ground floor residential uses are likely to remain appropriate in the long term. The assumptions have been revised so that only 50% of the sites that come forward will feature exclusive commercial uses at ground floor. This has resulted in an estimated increase in yields of approximately 200 dwellings.

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The outcome of the above is a change in the total number of homes delivered via intensification from 6,947 down to 6,872 with the overall % contribution reducing from 27% to 26%.

3.2.4 New Sites Identified through Submissions

3.2.4.1 New Sites in Nelson

Four additional sites in Nelson were assessed based on submissions received. Of these three were considered appropriate to include within the revised FDS, all of which were minor extensions of existing areas – N-11 Saxton, N-109 Wood South and N-112 Orphanage West. These have the potential to increase capacity provided via greenfield development by approximately 420 dwellings.

3.2.4.2 New Sites in Tasman

A total of 32 new or amended sites were identified through submissions across Tasman District. Many of these areas were close to previously assessed FDS areas which did not make it through the initial assessment. The majority of which were poorly aligned with the spatial strategy, included land identified as highly productive or were identified as featuring land with cultural sensitivities. Of the 32 sites assessed, eight new sites are recommended to be included. Most of these sites all relate to development in rural towns around Tasman or new rural residential areas. Hickmott Place in Motueka (site T-206) is the exception, proposed for mixed use development. No additional greenfield areas have been proposed.

3.2.5 Greenfield Areas

Several amendments to greenfield areas are proposed to take into account amended site boundaries. This includes an overall decrease for T-01 Jefferies Road and a minor increase for T-42 Seaton Valley Northern Hills. T-03 Shannee Hills has been removed based on landowner feedback while T-011 has been removed following more detailed infrastructure investigations as part of the ongoing plan change process in that area and the fact that it did not score as well as other new site proposed in Nelson. Site T-107 Edward St has reduced slight in size, so has site T-37 Fairfax St in Murchison and site T-195 Massey St in St Arnaud. Site T-145 Park Ave light industrial has changed in orientation.

Noting the general concern around the extent of greenfield residential development proposed in Tasman, we would also recommend the removal and/ or reclassification of T-28 Pigeon Valley Residential to rural residential uses and removal of T-41 88 Valley. These were two of the most marginal sites in terms of scoring (139 and 127 respectively) with development in Wakefield also performing poorly (relative to other areas) in the assessment of carbon emissions. Once T-28 was reassessed with the assumption for coming forward for rural residential uses, its rankings improved to 85 as infrastructure servicing issues were no longer relevant. The loss of these sites would reduce total greenfield provision by 1,250. This could be partially recovered with 210 dwellings under a rural residential classification.

Overall, the recommended changes would reduce the provision of greenfield dwellings to 8,956, down from 10,500 in the Draft FDS. In percentage terms this would result in a drop to 35% from 40%. Please note that the Coastal Tasman sites near Tasman village and in Lower Moutere are still not required to meet capacity targets.

3.2.6 Tasman Rural Residential Sites

An additional 6 rural residential areas close to the existing urban area have been identified, with one site within the draft FDS now proposed to be removed – T-54 Teapot Valley. Two of which are proposed residential areas now reclassified as rural residential as set out in 3.2.4 above.

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T-198 Higgins Road, located just south of T-01 in Brightwater, scored well within the MCA and better than the nearby rural residential alternative of T-54 Teapot Valley. This site is considered to have several benefits including its proximity to key active transport corridors linking the site to both Brightwater and Wakefield as well as reduced impacts on freshwater and highly productive land. Two further sites (T-205 and T-213) are located adjacent to T-17 Mytton Heights Hills while T-200 is adjacent to T-32 Pigeon Valley Rural Residential. These sites would effectively involve relatively minor expansions of these rural residential areas previously identified in the Draft FDS. The former two sites will assist in providing some increased capacity in close proximity to Motueka.

3.2.7 Rural Tasman Sites

Sites identified across rural Tasman are proposed to remain largely unchanged from the Draft FDS. The capacity assumed for identified sites generally exceeds projected demand for the relevant towns. This provides flexibility to the market to determine where new dwellings should be brought forward. In addition, this will provide an additional buffer should development not proceed or uptake at the assumed densities not be realized.

Additional development sites, T-217 79 Main Road, Tapawera, T-219 3177 Korere-Tophouse Road and T-204 39 Beechnest Drive, both in St Arnaud, have also been identified and included enabling more choice in these locations. There have also been some minor adjustments in site areas for T-37 Murchsion (Fairfax St) and T-195 Massey St, St Arnaud resulting in a slight reduction in yield. T-48 Rototai Road, Takaka has also been removed as a result of landowner feedback indicating no interest in redevelopment. As the Draft FDS proposed sites in excess of the anticipated capacity in Takaka, the loss of the 125 dwellings attributed to this site does not raise any capacity concerns.

3.3 Existing Residential Zoned Land in Nelson

Original residential capacity estimates covering Nelson City were informed by GIS data sources provided by Nelson City Council which identified the “Urban Built Area” and excluded land otherwise zoned for residential development or currently in the process of residential development. Key areas excluded from this were the areas around Lower Bayview, Toi Toi, Briannia Heights and Highview Drive.

As such, not all existing development areas within Nelson are captured by either identified FDS areas or the broader residential infill areas. This has resulted in another 1,240 dwellings being identified that can contribute to capacity requirements under the FDS. Comparable areas within Tasman District were captured as part of the initial capacity calculations.

3.4 Capacity Breakdown

The table overleaf presents the proposed changes in capacity from the Draft FDS based on officer feedback and a review of relevant submissions. Overall, 27% (7,026 dwellings) of growth across both Council’s is projected to be delivered from new managed greenfield development with a further 6% provided via rural residential uses. The balance of 67%¹ will be delivered in existing zoned urban areas via a combination of intensification, infill and the development of vacant greenfield sites which are already zoned for residential development. This split compares favorably with the Auckland Spatial Plan 2048,

¹ This represents an increase from 63% from the Draft FDS.

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where the equivalent split was for 62% of growth in the existing urban area, 32% via new greenfield development and 6% via rural residential.²

It should be noted that this reporting differs slightly from the Draft FDS as greenfield areas which were already zoned for residential uses and formed part of the existing urban area were not distinguished from greenfield areas which would require the rezoning of rural land.

In terms of the split between Councils, Nelson is projected to accommodate approximately 54% (13,989 dwellings) of growth required for the urban environment while Tasman will accommodate 46% (11,949 dwellings). This represents a slight increase for Nelson from the Draft FDS where the split was 49% of new dwellings in Nelson and 51% in Tasman (12,627 dwellings vs 13,208 dwellings). This change is largely driven by a reduction of some greenfield areas proposed for Tasman and the inclusion of existing zoned residential areas in Nelson along with a slight increase in greenfield areas.

Nelson is projected to deliver 20% of new housing via greenfield development on currently rural zoned land, a further 24% on zoned but as yet undeveloped residential land and 56% through intensification and infill development of existing built-up urban areas. In comparison, Tasman is projected to deliver 47% of new housing via greenfield and rural residential development on currently rural zoned land, a further 16% on zoned but as yet undeveloped residential land and 37% through intensification and infill development of existing built-up urban areas.

Table 3 overleaf provides a breakdown of where/ how new dwellings are projected to come from over the life of the FDS. The major change from the draft FDS is the contribution attributed to “greenfield” development. Previously, any development of currently vacant land whether or not it was already zoned for urban uses was identified as Greenfield development. For clarity, where FDS areas are identified on vacant sites which are already zoned for urban uses these have been reclassified to “Zoned” land in their respective local authority area.

² <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/auckland-plan/development-strategy/Pages/aucklands-capacity-for-growth.aspx>

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Table 3: Capacity breakdown between Draft and Revised FDS

Broad Typology	Draft FDS Yield	Draft FDS % Split	Revised FDS Yield	Revised FDS % Split
Intensification	6,947	27%	6,872	26%
Infill	5,500	21%	5,250	20%
Greenfield	10,500	40%	7,016	27%
Rural Residential	1,100	4%	1,285	5%
Zoned/ Deferred Residential Tasman	1,915	7%	1,915	7%
Zoned Residential Nelson	0	0%	3,390	13%
Zoned Rural Nelson	200	1%	200	1%
Total (Urban Areas)	26,300		25,928	

Overall, the potential for approximately 26,000 new dwellings has been identified in and around the existing urban area of Nelson/ Tasman. This exceeds the 24,000-target identified under a high-growth scenario. This is considered appropriate as of the 26,000 dwellings identified, approximately 7,000 would need to be delivered via greenfield development on existing rural zoned land. The capacity figures assume that 100% of identified greenfield sites will come forward and be developed to their full potential. However, this is unlikely to be the case due to issues around land-owner motivation, financing and feasibility. It is noted that the Kāpiti Coast FDS adopts a 70% uptake rate for new greenfield growth areas.

A further 3,000 dwellings are enabled more broadly across the Tasman Rural area. This is comprised of 1,034 dwellings within specified FDS areas serving the main rural towns across Tasman District along with a further 2,000 dwellings already enabled via existing Rural Residential and Rural 3 zones.

A summary of changes to recommended FDS areas is included in Attachment 1.

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Attachment 1 – FDS Growth Areas

	Amended / new capacity figure
	Site Removed
	Site reclassified to other typology group
	Capacity not required to meet targets – subject to DAPP

Greenfield Growth Options

Growth Option	Draft FDS Yield	Revised FDS Yield
N-11 Saxton	900	900
N-32 Orchard Flats	200	200
N-100 Griffin Site	265	265
N-106 Maitahi Bayview (PPC28)	900	900
N-111 Marsden & Ngawhatu (note: already zoned Residential)	2150	2150
N-112 Orphanage West	150	80
N-114 Saxton Extension	-	160
N-116 Orphanage West Extension	-	240
T-01 Jefferies Road, Brightwater	500	450
T-03 Shannee Hills (Katania)	100	100
T-05 Wanderers Avenue, Brightwater	150	150
T-11 Seaton Valley Flats - elevated	120	120
T-15 Te Awhina Marae papakainga	35	35
T-28 Pigeon Valley Residential	950	220
T-33 Seaton Valley Hills	375	375
T-38 Richmond South (Hope)	900	900
T-39 Paton Road foothills, Richmond	650	650
T-40 Hill Street South foothills, Richmond	200	200
T-41 88 Valley, Wakefield	300	60
T-42 Seaton Valley Northern Hills	170	170

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T-102 No. 100 Bryant Rd, Brightwater	110	110
T-107 177 Edward St (unzoned area), Wakefield	107	107
T-114 216 Champion Road "Broadgreen", Richmond	264	264
T-115 405 Lower Queen Street "Berryfields Crossing"	100	100
T-120 Richmond South between White Rd and Ranzau Rd	380	380
T-121 Richmond South between White Rd and Ranzu Rd, south of Paton Rd	260	260
T-194 144 & 200 Whitby Road, Wakefield	220	220
Total	10,500	9,166

Intensification Growth Options

Growth Option	Draft FDS Yield	Revised FDS Yield
N-15 Dodson Valley Road (and surrounds)	215	215
N-16 Neale Park	90	90
N-17 Vanguard Street (and surrounds)	40	40
N-18 Gloucester Street (and surrounds)	65	65
N-19 Nile Street East	130	200
N-20 Fairfield Park	260	260
N-21 Waimea Road North	80	80
N-22 Hospital/ Nelson South	160	250
N-23 Victory	250	250
N-24 Nayland North	235	235
N-26 Tahunanui Drive East	135	150
N-27 Stoke Centre	125	130

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N-28 Stoke School (and surrounds)	215	215
N-29 Nayland South	235	235
N-34 Tahunanui Drive West	100	150
N-35 Port Hills	90	90
N-101 Marlowe Street (and surrounds)	230	230
N-102 Roto Street (and surrounds)	100	70
N-103 Washington Valley North	35	50
N-104 Victoria Road (and surrounds)	35	70
N-107 City Centre South	285	285
N-108 City Centre North	200	200
N-109 Wood South	100	100
N-110 Wood North	180	120
N-285 Arapaki & Isel	300	300
N-287 Washington Valley South	45	45
N-288 St Vincent	120	120
N-289 The Brook	280	280
T-02 Brightwater Centre Intensification	45	45
T-103 Brightwater intensification area	25	25
T-22 Richmond Intensification	1500	1500
T-23 McGlashen Redevelopment, Richmond	25	25
T-29 Wakefield Intensification	95	95
T-30 Wakefield Church Land	12	12
T-104 Katania Heights intensive area, Brightwater	50	50
T-112 Salisbury Rd, Richmond intensification	60	60
T-115 405 Lower Queen Street "Berryfields Crossing"	-	100
T-189 Motueka Intensification (north)	275	275

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T-190 Motueka Intensification (south)	515	515
T-206 Hickmott Place	-	30
Intensification Total	6,947	6,872

Rural Residential (Urban Tasman) Growth Options

Growth Option	Draft FDS Yield	Revised FDS Yield
T-17 Mytton Heights Hills	450	450
T-28 Pigeon Valley Residential	-	210
T-32 Pigeon Valley Rural Residential	400	400
T-54 Teapot Valley	250	250
T-198 Higgins Rd, Falcon Ridge winery, Brightwater	-	85
T-200 405 & 433 Pigeon Valley Road	-	30
T-205 14 Waiwhero Road	-	60
T-213 319 Motueka Valley Highway	-	50
Total	1,100	1,285

Rural Tasman Growth Options

Growth Option	Draft FDS Yield	Revised FDS Yield
T-20 65 Hotham St, Murchison	50	50
T-37 Murchison (Fairfax St)	50	18
T-48 Rototai Road, Takaka	125	125
T-53 Collingwood	50	50
T-56 Tapawera south	50	50
T-138 4 Rototai Rd, Takaka	225	225
T-139 Land bound by Commercial St/Meihana St, Takaka	50	50
T-140 259 Takaka-Collingwood Highway	200	200

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T-143 Page Road, Takaka (next to Fresh Choice)	20	20
T-144 Park Avenue, Central Takaka	60	60
T-146 Murchison Holiday Park (170 Fairfax St and 174 Fairfax St)	25	25
T-154 268 Mangles Valley Rd, Murchison	15	15
T-155 land opposite 702 Mangles Valley Rd, Murchison	40	40
T-156 40 Matiri Valley, Murchison	5	5
T-157 Rata Avenua, Tapawera	20	20
T-163 42 Keoghan Road, Takaka	50	50
T-175 2596 Kawatiri-Murchison Highway, Murchison	30	5
T-176 26A Grey St Murchison	45	45
T-181 3010 Korere-Tophouse Rd, St Arnaud	50	50
T-195 Massey St, St Arnaud	15	2
T-217 79 Main Rd Tapawera	-	4
T-219 3177 Korere-Tophouse Road	-	50
Total	1,177	1,034

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Attachment 2 – Kāinga Ora feedback on capacity calculations and uptake assumptions

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Meeting notes



Project: Nelson Tasman FDS

Date: 29 April 2022

Time: 9:30am

Location: Teams

Name	Role/Organisation
Rachel Morgan	Planner, B&A – FDS project team member
Cam Wallace	Planner, B&A – FDS project team member
Ruth Evans	Planner, B&A – FDS project team member
Kirdan Lees	Economist, Sense Partners – economist advising on the FDS
Mel Rountree	Team Leader Development Planning, Kāinga Ora
Jennifer Rose	Planner, Beca – Kāinga Ora advisor
Tim Heath	Economist, Property Economics – Kāinga Ora advisor
Phil Osborne	Economist, Property Economics – Kāinga Ora advisor
Chris Pawson – apology	Senior Analyst, Nelson City Council, FDS project lead for NCC
Jacqui Deans – apology	Growth Coordinator, Tasman District Council, FDS project lead for TDC

Item	Detail
1	<p>Introductions and purpose of the session</p> <ul style="list-style-type: none"> a) Kāinga Ora submission and hearing presentation indicated general support for the FDS, proposed spatial strategy (except for the secondary proposal), outcomes b) Points of difference (items below) to discuss and seek to narrow the outstanding issues in order to inform the sub-committee deliberations – report due 10 May) <p>Discussion</p> <p>Noted.</p> <p>All agreed that the topics listed below cover the main issues raised in Kāinga Ora’s submission.</p> <p>Actions</p> <p>B&A to discuss with JD/CP if there is any flexibility in timeframe for deliberations report, to give time for Kāinga Ora advisors to consider the issues further and workshop with the FDS project team.</p>
2	<p>Economics – points raised in Kāinga Ora submission</p> <ul style="list-style-type: none"> a) Impact of including greenfield on intensification and affordability outcomes <ul style="list-style-type: none"> • <i>Impacts on intensification</i> • <i>Impacts on affordability</i> b) Theoretical and feasible capacity

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Item	Detail
	<ul style="list-style-type: none"> • <i>Appropriateness of FDS approach to calculating capacity</i> • <i>15% uptake rate (see Steve Cross hearing presentation)</i> <p>Discussion</p> <p>TH – is the high proportion of greenfield growth areas a failure in FDS in implementing NPSUD. How does the proportion of greenfield impact brownfield uptake? There are also impact of removing sequencing from the FDS. Questioned whether the potential brownfield feasible development been undercooked, including infill and comprehensive development.</p> <p>TH and PO discussed uptake rates – a key component is the ‘realisation rate’ and whether this impacted by amount of available greenfield. If greenfield is easy to develop then the realisation rate falls away, particularly in short and med term, and particularly if have live zoned greenfield in the market.</p> <p>Discussed the option to manage this impact on uptake is through staging of greenfield release. However even if not live zoned, but instead identified as future urban zone, or in a strategy as a future growth area, there will still be pressure to release these areas rather than develop intensification areas.</p> <p>15% uptake of intensification. B&A asked PE team what this should be if not 15%. PE noted it was hard to determine an alternative without further analysis. Noted they had not had a chance to read the FDS Technical Report. All agreed there was merit in doing sensitivity tests – high and low.</p> <p>Subject to KO agreement on additional work, PE will have a closer look at the uptake rate and assumptions, including reviewing the Technical Report. Then CW (B&A) and PE to will workshop this – aim for end of next week.</p> <p>On the greenfield/brownfield split, there is disagreement between the economists.</p> <ul style="list-style-type: none"> • Broadly, KL has concerns that not releasing greenfield means prices in the intensification areas increases, which then affects affordability. If have a mix of greenfield and brownfield prices will be lower. To incentivise brownfield then the value of this development needs to increase in order for developers to progress it. Developers will deliver intensification in response to market preferences. • PE team considers the FDS should be trying to get a different outcome. There should be a balance between feasible and realisable infill, and greenfield. Greenfield is not necessarily cheaper. If it is developed it must be developed efficiently. Increase in land values makes the use of land more efficient. TH doesn’t consider greenfield is cheaper based on recent analysis, and more greenfield won’t achieve affordability. A balance between greenfield and brownfield is needed to catalyse brownfield. Restricting land in any way will impact land prices. PE believe intensification can ultimately produce cheaper product. • All agree adding supply assists with affordability. But not just land supply that increases the cost, there are nationwide factors affecting this. • Need to understand the greenfield/brownfield balance for feasible uptake. • KL - direction in NPSUD for competitiveness of land and development markets supports a broad more liberal approach to land release.

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Item	Detail
	<ul style="list-style-type: none"> PE consider that implementation and staging is critical to getting a balanced greenfield/brownfield mix. <p>Actions</p> <p>PE team to read Technical Report and understand the methodology and assumptions, then undertake their own further analysis on greenfield/brownfield split and appropriate uptake rate. B&A to get TDC to send through Steve Cross presentation, so this can also be considered by PE team.</p> <p>CW and PO to meet next Friday to workshop capacity calculations.</p>
3	<p>Kāinga Ora proposed intensification/growth areas</p> <ul style="list-style-type: none"> a) Richmond (Lower Queen Street, Jubilee Park, Bateup Road, Salisbury School, Henley School) b) Māpua (Seaton Valley Road/Māpua Drive/Stafford Drive, others) c) Tasman Village d) Supporting calculations <p>Discussion</p> <p>B&A questioned inclusion of the sites in a) to c) above for a range of reasons including that Richmond Lower Queen Street areas are newly developed and unlikely to be redeveloped in 30 year timeframe. Other areas are schools or reserves.</p> <p>KO agreed these shouldn't be included in the FDS as growth areas. KO noted analysis informing the submission was very high level and really just applied a walking catchment, without looking at age of housing stock or status of land, and other matters that might affect potential for intensification.</p> <p>Discussed c), intensification at Tasman Village – advice from TDC is that this has significant infrastructure constraints but agreed to double check this with TDC.</p> <p>Regarding the supporting calculations, the FDS project team is looking at this in more detail including further discussions with KO, as per item 4 above.</p> <p>Actions</p> <p>B&A to check with TDC re. infrastructure at Tasman Village.</p> <p>Review of capacity calculations following KO and B&A meeting 6/5/22.</p>
5	<p>Housing affordability</p> <ul style="list-style-type: none"> a) Kāinga Ora suggestion that the FDS should have clearer and stronger focus on improving housing affordability (e.g. see paragraphs 56-59 of the submission). <p>Discussion</p> <p>JR noted there is not much focus on affordability in the FDS, it doesn't come across clearly other than in relation to land supply. Need to explain this further in the FDS.</p> <p>All agreed that ensuring land supply and providing capacity is the key method for the FDS to assist with housing affordability, consistent with the NPSUD. KO will consider this issue further and come back to us with any suggested improvements.</p> <p>Actions</p> <p>KO will come back to B&A with any further suggestions about strengthening how the FDS deals with affordability.</p>

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Item	Detail
	FDS team will also consider further and look at how this can be explained more fully in the FDS.
6	<p>Indicative staging</p> <p>a) Kāinga Ora suggestion that the FDS should have more detail on staging/sequencing of growth areas (e.g. see paragraphs 51 of the submission).</p> <p>Discussion</p> <p>KO acknowledged that staging is not included as has been removed from the NPSUD. KO suggested including some indication of the broad direction for staging. All agreed will be infrastructure-led. All agreed that limitations of detailed staging, and that if any staging were included in the FDS it would need to be high level and indicative only. All agreed that there is merit in exploring staging principles or similar as part of this.</p> <p>KL cautioned inclusion of staging and noted should look at the reasons why it was taken out of the NPSUD, including impacts on competitiveness or markets.</p> <p>PE will also look at implications of staging.</p> <p>All agreed there is merit in including high level / indicative staging.</p> <p>Actions</p> <p>FDS team to review options for amendments to the implementation section of the FDS.</p> <p>KO team to consider staging implications as part of the work being done next week and workshop on Friday.</p>
7	<p>Other matters</p> <p>Discussion</p> <ul style="list-style-type: none"> • Location of schools – KO support MoE submission on this. • Impact of natural hazards/climate change and resilience – discussed implications of DAPP and how DAPP areas aren't required to meet capacity. KO advice is that the councils should be working together on climate change response and resilience. • GHG emissions – RM asked if KO are doing any work in this space to guide councils in working out GHG emissions for growth strategies. MR not aware of anything but will look into it and report back. <p>Actions</p> <p>MR to ask team about any work KO is doing on calculating GHG emissions.</p>

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Penny Gaze

Subject: FW: FDS Workshop Notes

From: timothy@propertyeconomics.co.nz <timothy@propertyeconomics.co.nz> **On Behalf Of** tim@propertyeconomics.co.nz
Sent: Thursday, 12 May 2022 2:13 pm
To: Cam Wallace <CamW@barker.co.nz>; philosb1201@yahoo.co.nz
Cc: Rachel Morgan <RachelM@barker.co.nz>; Ruth Evans <RuthE@barker.co.nz>; 'Mel Rountree' <Mel.Rountree@kaingaora.govt.nz>
Subject: FDS Workshop Notes

Hi Cam,

Phil has added some script in blue to your email to more fully articulate his position / concern outlined at the workshop.

If there's anything else let us know.

- You agreed that the general methodology used for calculating potential housing capacity in intensification areas for the purposes of the FDS was appropriate. However, you still have some concerns around the 15% uptake rate and believe this could be on the conservative side. You also retain some concerns around Sense Partner's advice that the release of more greenfield land can support intensification by lower land prices.
- Property Economics agrees with the methodology utilised in assessing the theoretical (plan enabled) capacity. While there are a range of approaches used for this the methodology applied appears sound and practical.
- The key issue for Property Economics in understanding the potential uptake rate (or the rate that could be achieved through the PDP, presumably informed by the FDS). There are several aspects to this query including:
 - a. Recently (over the past 2 years) property prices in Nelson have increased over 40%, this increase will have fundamentally shifted the commercial feasibility of intensified residential development within the market. An example of this is the recent application of updated residential valuations for the Wellington region. The feasibility rate within existing urbanised areas within Wellington City doubled due in large part because of this valuation change. Essentially, it is unrealistic to presume that the development potential for brownfill residential development does not change in a market that is experiencing these growth pressures. (It is also important to note that the vast majority of this price change can be explained through macro-economic influences, such as low interest rates).
 - b. Additionally, the uptake rate is heavily influenced by the level of 'alternative' development competition. In this case the level of greenfield provision and competition has the potential to materially impact upon the propensity for the market to develop brownfill sites.

Property Economics' primary concern remains the influence the adoption of this rate has on the requirement to identify and zone additional greenfield capacity and my its nature the impact this will have on the uptake rate of brownfill compact redevelopment.

In terms of the realistic nature of the 15% itself, Property Economics has undertaken some site specific feasibility assessment modelling that would indicate this figure is potentially at the lower range of potential development. This in itself would require some consideration of QFM to understand the level of impact these would have (as identified below).

- The 15% uptake used was not considered a target to achieve, rather it was what we thought was realistic based on the level of intensification we were proposing. Ideally, uptake rates will be higher than 15%.

- Note the capacity numbers have assumed full build out of sites to the density assumptions including areas where 100 to 125 dwellings per hectare is assumed. For this to be achieved it would likely require a number of 5-6 storey apartment buildings to be delivered. The more modest density targets of 60 dwellings per hectare used for most of the intensification areas and most of the Nelson urban area will still require full build out equivalent to what can currently occur in the MHU zone in Auckland (e.g. three-storey walk-ups or narrow terraces).
- It is also worth noting that we cant rely on all of the calculated intensification capacity as this relies on intensification in areas subject to significant coastal inundation and flooding risks such as The Wood. NCC are currently doing more detailed investigations around the potential for intensification in these areas as part of their district plan review.
- Our approach to the strategy and meeting the housing targets under a high growth scenario was to firstly try and accommodate as much growth as possible via intensification. Once we had exhausted intensification options we then sought to utilise greenfield areas that were already zoned or deferred zone for residential (e.g. Ngawhatu and Marsden Valley). Once all of these options had be taken into consideration we still found ourselves short of the 24,000 housing target and therefore sought to identify additional greenfield sites for inclusion. We used the preferred spatial scenario and the MCA scoring to identify these sites, which resulted in sites closest to the existing urban area being included that were not otherwise 'red flagged'. This included the Maitai Valley, Richmond South, Saxton and Motueka. In other words, we did not seek to maximise the amount of greenfield development capacity in response to Sense Partners advice.
- You highlighted a need for the FDS to provide greater clarity around prioritisation or potential sequencing of the release of any greenfield land within the strategy. Agreed.

Regards



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MEMORANDUM

TO: Future Development Strategy Hearings Committee
FROM: Drew Bryant (Senior Infrastructure Planning Advisor)
DATE: 6 May 2022
FILE NO: GHG Emissions Modelling Memorandum v2
RE: **Household Transport Emissions Analysis**

Summary

Staff have developed a model to assist Councillors deliberate on the implications of transport related GHG emissions related to different development patterns. To do this, staff have developed the model from first principles that uses a Ministry of Transport pathway as the basis for what transport will be like in the future.

The FDS proposal can potentially reduce household transport emissions by 94% of current emissions by 2050. However, this is not enough to achieve international and national targets of keeping global temperatures increases less than 1.5°C. Development within or close to Richmond/Nelson (including all suburbs) has the least amount of Vehicle Kilometres Travelled (VKT) and will generally contribute the least GHG emissions (intensification scenario). However, this is not enough on its own to meet transport GHG emission targets.

Introduction

Nelson City Council (NCC) and Tasman District Council (TDC) are developing a combined Future Development Strategy (FDS). International and national net GHG emission reduction targets for keeping global temperatures increases less than 1.5°C are 50% reduction by 2030 and 100% reduction by 2050. Advice from the Climate Change Commission recommendations to government is that transport will have to meet a higher proportion of net reductions than many other activities. In May 2019, NCC declared a Climate Emergency and prioritised collective action to climate change mitigation and adaptation. In 2019, TDC adopted the Tasman Climate Action Plan which sets out goals target and actions to mitigate GHG emissions from Council activities and to advocate and encourage others to take action.

The draft FDS proposes using a combination of intensification and greenfield development to cater for the expected growth in the area over the next 30 years. The geographical constraints of the combined region means many greenfield developments are separated from the main NRUA. This includes all suburbs that make up the wider contiguous urban space straddling the boundary of NCC and TDC. The geographic separation means significant travel through rural areas. Development in these new non-NRUA greenfield areas would mean that a greater number of residents will drive long distances for everyday activities such as work or school. This will in turn

increase vehicle travel and transport related Greenhouse Gas (GHG) emissions when there is a need to reduce GHG emissions.

This analysis helps to identify the development areas that contribute the greatest to transport GHG emissions and quantify the future transport emissions from the FDS proposal. This analysis only looks at opportunities to change development areas within a commutable distance to Nelson but does include all NCC and TDC in future emissions calculations.

Note: The Government are finalising their Emissions Reduction Plan (ERP) and will be released on 16 May 2022. Some of the information in this memo and assumptions may be superseded by the new ERP.

Vehicle Kilometres Travelled

VKT is the combined distance that households travel each day and can be used as a proxy to assist in identifying the development areas that will contribute the most to transport GHG emissions. The greater the VKT, the more transport emissions a development area is likely to produce. Staff have used 2018 travel to work and school census data to determine the travel patterns of different development areas. The results of the analysis are shown in Figure 1 below.

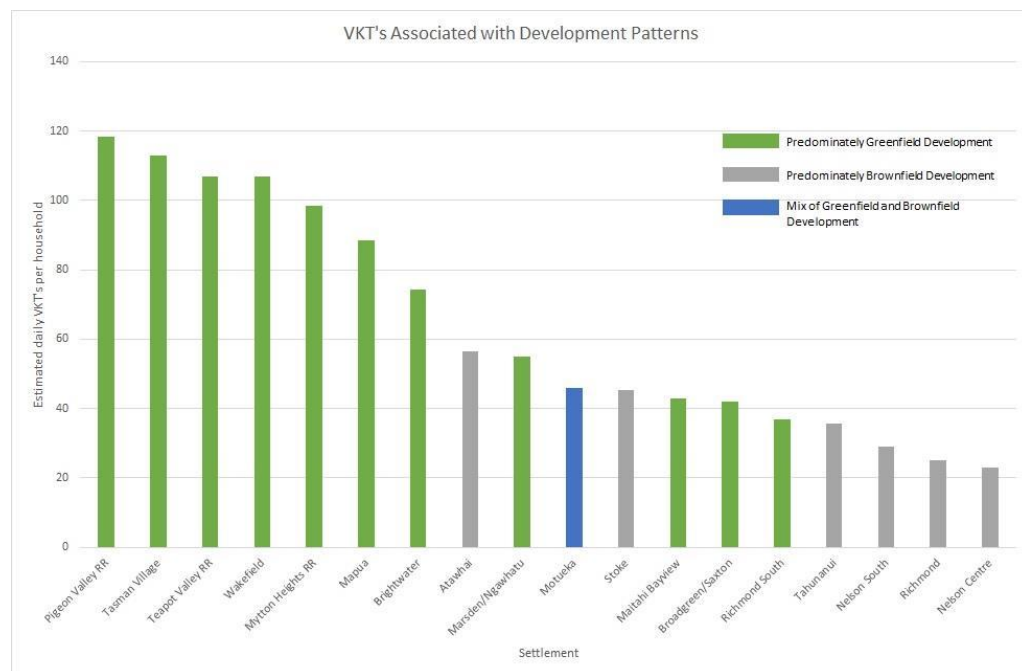


Figure 1: VKT's from Developments

Figure 1 shows that rural residential and non-NRUA greenfield development a long way from NRUA produces the most VKT's due to a high proportion of residents travelling to work or school in NRUA. The exception to this is Motueka. Motueka is large enough that it includes a number of workplaces and schools that mean a high proportion of residents stay local. In addition, there is a high number of residents that work just outside of Motueka like Riwaka or Lower Moutere. This

shows that developments within (or very close to) NRUA or Motueka will produce the least VKT's and therefore the least GHG emissions.

Transport Emissions

Staff have used the travel patterns from the VKT analysis and combined it with future transport changes and the residential growth from the draft FDS to model transport emissions in 2035 and 2050 as shown as red in Figure 2 below.

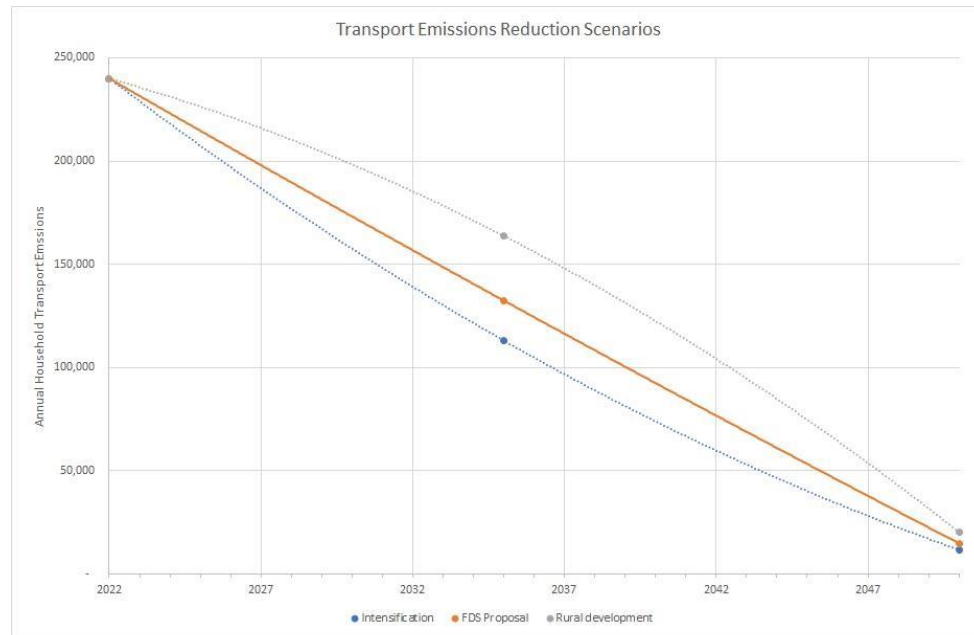


Figure 2: Future Transport Emissions

In order to understand the results, staff also modelled two other scenarios that have significantly different development patterns. The first is 'Intensification' (blue) which looks to extensive intensification in the NRUA with some intensified greenfield development that has low VKT's to make up the required dwelling numbers. The second is a 'rural development' (grey) which will cater for all the new growth expected in the combined regions for the next 30 years. These two scenarios provide context to where the proposed FDS sits. The FDS proposal can reduce household transport emissions by 94% of current emissions by 2050 but only 37% by 2030. The draft FDS emissions reduction trend is constant over the next 28 years compared with the targets which requires faster reductions early on. When compared with the intensification scenario, the draft FDS proposal does not get the same level of early GHG emissions but is still much better than a rural development scenario.

Staff have also compared the modelled GHG emissions against the national and international GHG emission reduction targets are shown in Figure 3 below.

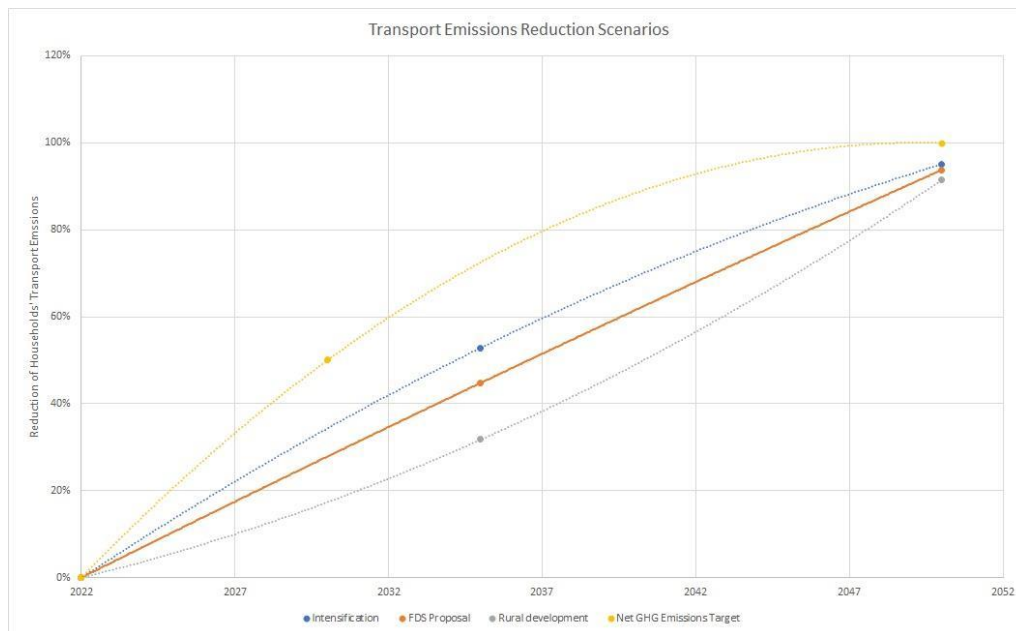


Figure 3: Transport GHG Emissions Reductions

Transport emissions need to be above the GHG emissions target line to be on track to keeping global temperatures increases less than 1.5°C. As it can be seen from Figure 3 the FDS proposal is close to the intensification scenario, but both the proposed FDS and the intensification scenario are significantly under the GHG emissions target. The target requires greater emission reduction within the next eight years than what the FDS allows. To achieve the transport emission targets, emissions will need to be offset by planting around 3.1 million pine trees by 2030.

Assumptions

Staff have produced this analysis to assist Councillors in assessing FDS options. This type of analysis is relatively new to New Zealand and staff have had to develop this from first principles rather than utilising a tested methodology.

This modelling is based on a future scenario and therefore staff have made a number of assumptions as to what will happen. Staff have endeavoured to use other research or Government advice to provide some consensus and alignment. Staff acknowledge the challenge of over reliance on the accuracy of future predictions. Staff recommend the trends and patterns relative to other development areas and scenarios rather than figures.

Staff have used Hikina to Kohupara, Transport Emissions: Pathways to Net Zero by 2050 by Ministry of Transport (Pathway 4) as the basis for future transport scenarios¹.

Other key assumptions include:

¹ <https://www.transport.govt.nz/assets/Uploads/Discussion/Transport-EmissionsHikinateKohuparaDiscussionDoc.pdf>

- Growth of existing settlements or suburbs will mean a greater proportion of residents will stay within the settlement for work;
- Any new townships will have travel patterns similar to neighbouring towns;
- Residential development areas outside of commutable distances to Nelson (Takaka, Murchison, St Arnaud, Collingwood, etc.) will continue to have the same travel patterns as those seen in the 2018 census data.

The intensification scenario focusses on all intensification areas in the NRUA. The scenario assumes 45% update of intensification over the next 30 years which is three times higher than the 15% used in the draft FDS. Even at 45% intensification, the NRUA does not provide enough dwellings to match the draft FDS and therefore the intensification scenario includes some greenfield development in Richmond South and Saxton.

The rural development scenario focuses on all growth over the next 30 years being through development within TDC around 25km from Richmond. The 'rural development' would be on the public transport routes.

Conclusions

The FDS proposal can reduce household transport emissions by 94% of current emissions by 2050 but only 37% by 2030. This is not enough reduction to support transport emissions contribution to achieve international and national targets of keeping global temperatures increases less than 1.5°C without carbon offsetting. Development within the NRUA has the least amount of VKT's and will generally contribute the least GHG emissions (intensification scenario) but is also not enough on its own to meet transport GHG emission targets.

Attachment Six: Information requests from the FDS Subcommittee during submission hearings

Information requests from the Subcommittee for day one of hearing (26th April 2022).

Related submission/source of request	Information Request	Who is actioning/response In scope or out of scope?
Steve Cross submission	Intensification uptake rate. Kirdan's "ballpark figure" not refined analysis. FDS has used 15% of sieved sample why not 15% of gross sections as Chch CC did? Cllr Edgar (day two) Q15 of survey – says intensification happens slowly over time – uptake rates?	<p>Refer to Analysis Report (appended to the Deliberations Report) section 3: Approach to Calculating Capacity incl. Uptake Rate</p> <p>Regarding the 'ballpark figure' - the purpose of the capacity calculations in the draft FDS is to broadly understand how much capacity the preferred spatial scenario enables at a high level. This included getting a broad understanding of potential plan-enabled capacity with the use of density per hectare assumptions. A broad uptake rate was then applied as a proxy for feasibility. This analysis was deliberately strategic and high level and was not intended to meet the requirements of clause 3.2 or 3.3 of the NPSUD.</p> <p>Regarding the process compared to Christchurch - As explained in Section 7.3.2.2 of the Technical Report, the 15% uptake rate was based on advice from Sense Partners, which benchmarked with Christchurch using the new Medium Density Residential Standards. When adjusting for Nelson conditions, this indicated a range of potential uptake between 4%-10% over the medium term. This was conservatively extrapolated out to 15% over the long term. As noted by Sense Partners, estimates become less assured over the long term, and the method does not capture landowner willingness, and preferences could differ across regions. This is particularly the case in Nelson, where higher density forms of housing are not enabled at scale in the Nelson Resource Management Plan and it is uncertain how the local market will respond when it is. In the face of this uncertainty, in our</p>

		<p>opinion, it is appropriate to take a conservative approach. The annual implementation plan and the three-yearly review of the FDS provide the opportunity to regularly review these assumptions and adjust the roll-out out of greenfield land in response.</p> <p>IN SCOPE</p>
	Why is there a difference between the % uptake rate in NCC's HBA and the FDS?	<p>Refer to Analysis Report (appended to the Deliberations Report) section 3: Approach to Calculating Capacity incl. Uptake Rate</p> <p>IN SCOPE</p>
	TDC used uptake rate in HBA based on actual development rate over 2 years. JD will see if she can get this as a % of all sections.	<p>Refer to Capacity Calculations memo (appended to the Deliberations Report) section 3.13: Tasman RIDA.</p> <p>Between end 2018 when the RIDA Plan Change was operative and July 2021, 20 resource consents were consented in RIDA where the intensive rules are used. Nine of these consents are where the house has been removed and replaced with multi units and 11 of these are where a second dwelling is added to the site. The majority of these consents are single storey but some are 2-storey and together these consents have resulted in a net addition of 36 dwellings in two years. Just before the RIDA rules were operative (2016-2017) a further six resource consents were granted within RIDA where the proposals were discretionary due to not complying with original rules, providing 16 net additional dwellings. This makes a total of 52 net additional dwellings from the RIDA rules.</p> <p>IN SCOPE</p>
Cllr McGurk (Cross 31363 and Kainga Ora)	An explanation of the uptake calculations? Explanation of the variation from 2019? What adjustments have been made for post-Covid? How has the data from Sense Partners been used? Kainga Ora reckon we have underestimated the brownfield uptake figure. Similar issue has been raised in NT2050 submissions	<p>Refer to Analysis Report (appended to the Deliberations Report) section 3: Approach to Calculating Capacity incl. Uptake Rate (section 3.3.2) and the Capacity Calculations memo: section 3 (appended to the Deliberations Report).</p> <p>Put simply, the uptake rate assumes that 15% of the sites identified as being appropriate to support intensification across Nelson and Tasman will actually be</p>

		<p>redeveloped. There are two key differences between the approach used in 2019 and 2022:</p> <ul style="list-style-type: none"> - The 2022 FDS includes a significant increase in the gross density assumptions for both greenfield and intensification, based on a more up to date yield analysis of the Auckland Unitary Plan; and - The uptake rates used in the 2019 FDS were based on the percentage of building consents that were more intensive forms of housing. Whilst this tells us about the <i>type</i> of housing that developers may deliver, it doesn't inform on the <i>number</i> of sites that may be developed as a percentage of all sites across the urban environment. <p>In our view, the advice from Sense partners regarding the 15% uptake rate is more reliable and up to date as discussed above and in the analysis report.</p> <p>B&A have met with Kainga Ora representatives twice since the hearing and the outcomes of this discussion are explained the Analysis report.</p> <p>IN SCOPE</p>
Cllr McGurk	Are forested areas included in the FDS?	<p>Sites assessed and some sites proposed include forestry, where the landowner has suggested that it will be harvested within a timeframe that would make the site available in the next 30 years.</p> <p>Where submitters have expressed concerns about forestry slash and subsequent environmental degradation, TDC has explained that it has existing work programmes researching and addressing these areas of concern which will feed into the Tasman Environment Plan work.</p> <p>In Nelson, there is only one small area in forestry and that is the Orchard Flats area N-032</p> <p>IN SCOPE</p>
Cllr McGurk Jonkers/Robson/ Richards/Kainga Ora	How have CO2 emission reductions and targets been factored into FDS	<p>Refer to Analysis Report (appended to the Deliberations Report) section 6: Climate Change and Emissions Reduction, as well as the VKT's work completed by TDC (detailed in Staff Deliberations Report).</p>

		<p>The accessibility mapping undertaken for the draft FDS has been the primary tool for evaluating how the future urban form of Nelson and Tasman can best support a reduction in greenhouse gas emissions. This mapping identifies those parts of Nelson and Tasman that are accessible to a range of commercial and community services. The accessibility analysis was utilised in several ways including assessing the spatial scenarios in terms of their relative accessibility, assessing growth areas by the level of accessibility by public and active transport and gave this the highest weighting of all the criteria, and allocating heights and densities according to relative accessibility within each preferred spatial scenario.</p> <p>VKTs work: TDC staff have also developed a model to illustrate the different development patterns and associated impact on transport related GHG emissions within the urban environment of both Councils. This work has concluded that the draft FDS proposal can reduce household transport emissions by 94% of current emissions by 2050, but only 37% by 2030.</p> <p>IN SCOPE</p>
Gilkinson	How is our FDS aligned to the emission reduction goals in the Zero Carbon Act? How does the FDS achieve those goals?	<p>Refer to Analysis Report (appended to the Deliberations Report) section 6: Climate Change and Emissions Reduction, as well as the VKT's work completed by TDC.</p> <p>As above, the draft FDS has focussed on analysing how the future urban form of Nelson and Tasman can best support a reduction in greenhouse gas emissions and the accessibility mapping tool has been the primary tool for evaluating this.</p> <p>IN SCOPE</p>
Cllr McGurk	What infrastructure is planned for N-111 & N-112 Orphanage West Block? (Raine Farms)	<p>There is no infrastructure planned in the current LTP, asset management plans or Infrastructure Strategy for this area as it is new for this FDS. The detailed work on this is still to be done but it is anticipated that there will be upgrade required to the wastewater network as per the Ngawhatu IAF application, extension of the stormwater main from Ngawhatu and a new upper reservoir and pump station for water supply.</p> <p>IN SCOPE</p>
Cllr McGurk	Content and how was the FDS communicated to Tahunanui	<p>There were errors and mislabelling issues and in one of the four pieces of advertising it referenced Nelson City Centre and Nelson South rather than Tahunanui. However,</p>

	residents? Claims that it was inadequate and conflicting content (Cross/Davey/Conway)	the public notice and 3 of the 4 advertisements as well as the FDS document itself, reference Nelson which includes Tahunanui. Nelson is a compact area compared to most local authority areas, so the communication was aimed at everyone rather than tailored to each individual suburb. Every household in Tahunanui will have received a copy of three stories included in Our Nelson and delivered to all households. IN SCOPE
Cllr McGurk and Cllr Edgar	How have natural hazard overlays been advised/notified in the FDS? Kainga Ora said we haven't (TDC). What adjustments have been made to recognise and build resilience to those natural hazards?	<p>Staff from both councils do work collaboratively together on our natural hazards work streams (e.g. development of technical hazards information, sharing of knowledge and understanding of best practice) which enables consistency between districts. Under the RMA 1991 (section 6h) the councils are required to manage the significant risks from natural hazards, and the FDS demonstrates this by avoiding future growth in areas with significant hazard risk, and instead directing this growth to areas where the hazard can be mitigated or there is no risk.</p> <p>Nelson mapping showing areas of the following natural hazards were used in determining the scoring for each site in the Nelson area:</p> <ul style="list-style-type: none"> • liquefaction • flooding • coastal inundation • Slope stability • Fault rupture zones <p>Tasman Slope Instability. Mapping is limited to key settlements/areas where there is known or potential slope instability and current or anticipated future development pressure, including Richmond, Clifton-Pohara-Ligar Bay, and Collingwood. A broader assessment across the wider District has not been undertaken. However, all sites have been assessed by Council's Hazards senior resource scientist.</p> <p>Since the draft FDS being produced, high level liquefaction mapping has been undertaken by TDC and is on our website, see liquefaction map Tasman District Council. Those areas that are potentially vulnerable to liquefaction are generally low-</p>

		<p>lying coastal areas that will also be vulnerable to coastal hazards and sea level rise, and have therefore been avoided through the FDS assessment for Tasman.</p> <p>Flooding mapping TDC - Flood models (present day, and 2081-2100) for: Takaka; Motueka, Māpua/ Ruby Bay, Richmond, Brightwater/ Wakefield, and Pohara. Flood modelling for the wider District has not been undertaken. However, all sites have been assessed by Council's Senior Hazards resource scientist and infrastructure planners.</p> <p>All available flood mapping data, which has informed the opportunities and constraints analysis and MCA scoring are shown as layers in the FDS Viewer: https://experience.arcgis.com/experience/b7a47abf8bd400cab1d24f4425ec086/</p> <p>IN SCOPE</p>
Haddon	Relevance of RPS?	<p>Nelson Regional Policy Statement was made operative in 1997 and the Tasman Regional Policy Statement was last amended in 2011. Significant changes in national policy direction have occurred since this time and both of these documents are due to be reviewed through the Tasman Environment Plan and Nelson Plan processes. The FDS Outcomes have been drafted to reflect latest national policy direction and community values determined through recent consultations.</p> <p>IN SCOPE</p>
	Kaka Valley – inundation risk and flood risk	<p>This is an onsite effect that will need to be designed for and will be considered as part of the Plan Change process.</p> <p>IN SCOPE</p>
	Status of Tahunanui Structure Plan 2004 (Boffa Miskell)	<p>The Tahunanui Structure Plan is a relevant consideration and has been reviewed in preparing the FDS. However, it is a designed based document that was completed nearly 20 years ago and there has been significant change in national policy direction since that time, which means it needs to be reviewed in this context.</p> <p>IN SCOPE</p>
	Supporting evidence about infrastructure planning for Tasman village and T-136	<p>In the 2021 Water Supply AMP, TDC put a \$20M placeholder project (very high level estimate) that comprised the major components of a water supply in order to service the Lower Moutere growth area. This comprises new source treatment, storage and reticulation. When we did the estimating exercise, we assumed the development was at School Lane, Lower Moutere (previous 2019 FDS site for 1200</p>

		homes), rather than Braeburn Rd (site T-136) and that source water was from Motueka. However, the estimate would be relevant for site T-136. Estimates for wastewater for this site are \$8.5M for new rising mains and pump stations. IN SCOPE
Cllr Olgilvie asked for	Building consents for dwellings over last 3 years and where they are located spatially in Nelson and Tasman	Complete – see below table IN SCOPE
	Sea level rise projections for Nelson and Tasman	Complete – see below table IN SCOPE
Ina Kara-France	May I please have the following information for the purpose of the Future Development Strategy 2022 – 2052: Nelson City Council and Tasman District Council Hearing Panel Iwi Representative due diligence. 1. Evidence of the Iwi and Mana Whenua Documentation required as follows: a. Manawhenu Ki Mohua • Treaty Settlement Statutory Obligations • Iwi Environmental Management Plan • Cultural Impact Assessments (on file) • Cultural Values Assessments (on file) • Department of Conservation: Conservation Management Strategy • Takutai Moana – Marine and Coastal Claim(s)	Manawhenu Ki Mohua Note this is the Mohua grouping of Ngati Tama, Te Atiawa and Ngati Rarua, there is no separate settlement or IMPs etc Treaty Settlement Statutory Obligations none – individual stat obligations for each iwi Iwi Environmental Management Plan none Cultural Impact Assessments (on file) Cultural Values Assessments (on file) Department of Conservation: Conservation Management Strategy: Nelson/Marlborough: Conservation management strategies (doc.govt.nz) Takutai Moana – Marine and Coastal Claim(s) Ngāti Kuia Ngāti Kuia (ngatikuia.iwi.nz) Treaty Settlement Statutory Obligations Letter (nelson.govt.nz) Iwi Environmental Management Plan https://www.tasman.govt.nz/document/serve/Pakohe%20Management%20Plan%202015%20Ng%C4%81t%20Kuia.pdf?DocID=19203 Cultural Impact Assessments (on file) Cultural Values Assessments (on file) Department of Conservation: Conservation Management Strategy: Nelson/Marlborough: Conservation management strategies (doc.govt.nz)

	<p>b. Ngāti Kuia</p> <ul style="list-style-type: none"> Treaty Settlement Statutory Obligations Iwi Environmental Management Plan Cultural Impact Assessments (on file) Cultural Values Assessments (on file) Department of Conservation: Conservation Management Strategy Takutai Moana – Marine and Coastal Claim(s) 	<p>Takutai Moana – Marine and Coastal Claim(s) https://www.tearawhiti.govt.nz/te-kahui-takutai-moana-marine-and-coastal-area/applications/te-tau-ihu/#</p> <p>Ngāti Apa Ki te Rā Tō</p> <p>Treaty Settlement Statutory Obligations Letter (nelson.govt.nz)</p> <p>Iwi Environmental Management Plan none</p> <p>Cultural Impact Assessments (on file) Cultural Mapping - Ngāti Apa ki te Rā Tō (ngatiapakiterato.iwi.nz)</p> <p>Cultural Values Assessments (on file) Cultural Mapping - Ngāti Apa ki te Rā Tō (ngatiapakiterato.iwi.nz)</p> <p>Department of Conservation: Conservation Management Strategy: Nelson/Marlborough: Conservation management strategies (doc.govt.nz)</p> <p>Takutai Moana – Marine and Coastal Claim(s) https://www.tearawhiti.govt.nz/te-kahui-takutai-moana-marine-and-coastal-area/applications/te-tau-ihu/#</p> <p>Ngāti Koata</p> <p>Treaty Settlement Statutory Obligations Letter (nelson.govt.nz)</p> <p>Iwi Environmental Management Plan https://www.tasman.govt.nz/document/serve/Ng%C4%81t%C4%81%20K%C5%8Data%20Trust%20Iwi%20Management%20Plan%202002.pdf?DocID=15412</p> <p>Cultural Impact Assessments (on file)</p> <p>Cultural Values Assessments (on file)</p> <p>Department of Conservation: Conservation Management Strategy: Nelson/Marlborough: Conservation management strategies (doc.govt.nz)</p> <p>Takutai Moana – Marine and Coastal Claim(s) https://www.tearawhiti.govt.nz/te-kahui-takutai-moana-marine-and-coastal-area/applications/te-tau-ihu/#</p> <p>Ngāti Rarua</p>
	<p>c. Ngāti Apa Ki te Rā Tō</p> <ul style="list-style-type: none"> Treaty Settlement Statutory Obligations Iwi Environmental Management Plan Cultural Impact Assessments (on file) Cultural Values Assessments (on file) Department of Conservation: Conservation Management Strategy Takutai Moana – Marine and Coastal Claim(s) 	
	<p>d. Ngāti Koata</p>	

	<ul style="list-style-type: none"> • Treaty Settlement Statutory Obligations • Iwi Environmental Management Plan • Cultural Impact Assessments (on file) • Cultural Values Assessments (on file) • Department of Conservation: Conservation Management Strategy • Takutai Moana – Marine and Coastal Claim(s) <p>e. Ngāti Rarua</p> <p>Ngāti Tama</p> <ul style="list-style-type: none"> • Treaty Settlement Statutory Obligations • Iwi Environmental Management Plan • Cultural Impact Assessments (on file) • Cultural Values Assessments (on file) • Department of Conservation: Conservation Management Strategy • Takutai Moana – Marine and Coastal Claim(s) <p>f. Ngāti Tama</p> <ul style="list-style-type: none"> • Treaty Settlement Statutory Obligations • Iwi Environmental Management Plan 	<p>Treaty Settlement Statutory Obligations Letter (nelson.govt.nz) Resource Kete (ngatirarua.iwi.nz)</p> <p>Iwi Environmental Management Plan https://www.tasman.govt.nz/document/serve/Ng%C4%81ti%20R%C4%81rua%20Environmental%20Plan%202021%20-%20Final%20.pdf?DocID=32892</p> <p>Cultural Impact Assessments (on file) Resource Kete (ngatirarua.iwi.nz)</p> <p>Cultural Values Assessments (on file)</p> <p>Department of Conservation: Conservation Management Strategy</p> <p>Takutai Moana – Marine and Coastal Claim(s) https://www.tearawhiti.govt.nz/te-kahui-takutai-moana-marine-and-coastal-area/applications/te-tau-ihu/#</p> <p>Ngāti Tama</p> <p>Treaty Settlement Statutory Obligations Letter (nelson.govt.nz)</p> <p>Iwi Environmental Management Plan https://www.tasman.govt.nz/document/serve/Ng%C4%81ti%20Tama%20Environmental%20Management%20Plan%202018.pdf?DocID=29832</p> <p>Cultural Impact Assessments (on file)</p> <p>Cultural Values Assessments (on file)</p> <p>Department of Conservation: Conservation Management Strategy: Nelson/Marlborough: Conservation management strategies (doc.govt.nz)</p> <p>Takutai Moana – Marine and Coastal Claim(s) https://www.tearawhiti.govt.nz/te-kahui-takutai-moana-marine-and-coastal-area/applications/te-tau-ihu/#</p> <p>Ngāti Toa Rangatira</p> <p>Treaty Settlement Statutory Obligations Letter (nelson.govt.nz) Settlement — Ngāti Toa Rangatira (squarespace.com)</p> <p>Iwi Environmental Management Plan none lodged with NCC or TDC</p> <p>Cultural Impact Assessments (on file)</p>
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	<ul style="list-style-type: none"> • Cultural Impact Assessments (on file) • Cultural Values Assessments (on file) • Department of Conservation: Conservation Management Strategy • Takutai Moana – Marine and Coastal Claim(s) 	<p>Cultural Values Assessments (on file)</p> <p>Department of Conservation: Conservation Management Strategy: Nelson/Marlborough: Conservation management strategies (doc.govt.nz)</p> <p>Takutai Moana – Marine and Coastal Claim(s) https://www.tearawhiti.govt.nz/te-kahui-takutai-moana-marine-and-coastal-area/applications/te-tau-ihu/#</p>
	<p>g. Ngāti Toa Rangatira</p> <ul style="list-style-type: none"> • Treaty Settlement Statutory Obligations • Iwi Environmental Management Plan • Cultural Impact Assessments (on file) • Cultural Values Assessments (on file) • Department of Conservation: Conservation Management Strategy • Takutai Moana – Marine and Coastal Claim(s) 	<p>Rangitane No interests outside of Marlborough</p> <p>Treaty Settlement Statutory Obligations Letter (nelson.govt.nz)</p> <p>Iwi Environmental Management Plan</p> <p>Cultural Impact Assessments (on file)</p> <p>Cultural Values Assessments (on file)</p> <p>Department of Conservation: Conservation Management Strategy: Nelson/Marlborough: Conservation management strategies (doc.govt.nz)</p> <p>Takutai Moana – Marine and Coastal Claim(s)</p>
	<p>h. Rangitane</p> <ul style="list-style-type: none"> • Treaty Settlement Statutory Obligations • Iwi Environmental Management Plan • Cultural Impact Assessments (on file) • Cultural Values Assessments (on file) • Department of Conservation: Conservation Management Strategy • Takutai Moana – Marine and Coastal Claim(s) 	<p>Te Atiawa</p> <p>Treaty Settlement Statutory Obligations Letter (nelson.govt.nz)</p> <p>Iwi Environmental Management Plan Iwi Environmental Management Plan - Te Atiawa o Te Waka-a-Māui (teatiawatrust.co.nz)</p> <p>Cultural Impact Assessments (on file)</p> <p>Cultural Values Assessments (on file)</p> <p>Department of Conservation: Conservation Management Strategy: Nelson/Marlborough: Conservation management strategies (doc.govt.nz)</p> <p>Takutai Moana – Marine and Coastal Claim(s) https://www.tearawhiti.govt.nz/te-kahui-takutai-moana-marine-and-coastal-area/applications/te-tau-ihu/#</p>

	<ul style="list-style-type: none"> • Takutai Moana – Marine and Coastal Claim(s) <ul style="list-style-type: none"> i. Te Atiawa <ul style="list-style-type: none"> • Treaty Settlement Statutory Obligations • Iwi Environmental Management Plan • Cultural Impact Assessments (on file) • Cultural Values Assessments (on file) • Department of Conservation: Conservation Management Strategy: Nelson/Marlborough: Conservation management strategies (doc.govt.nz) • Takutai Moana – Marine and Coastal Claim(s) Ngāi Tahu <ul style="list-style-type: none"> • Treaty Settlement Statutory Obligations: https://ngaitahu.iwi.nz/te-runanga-o-ngaitahu/ngai-tahu-governance/constitution-and-legislation/ • Iwi Environmental Management Plan: https://ngaitahu.iwi.nz/te-runanga-o-ngaitahu/papatipu-runanga/kaikoura/environmental-management-plan/ • Cultural Impact Assessments (on file): https://ngaitahu.iwi.nz/culture/cultural-mapping/ • Cultural Values Assessments (on file): https://ngaitahu.iwi.nz/culture/cultural-mapping/ • Department of Conservation: Conservation Management Strategy: Nelson/Marlborough: Conservation management strategies (doc.govt.nz) • Takutai Moana – Marine and Coastal Claim(s): https://ngaitahu.iwi.nz/environment/customary-fishing/ • Te Tau Ihu Statutory Acknowledgements Tasman District Council Iwi Management Plans Tasman District Council
	<ul style="list-style-type: none"> • Takutai Moana – Marine and Coastal Claim(s) <ul style="list-style-type: none"> j. Ngāi Tahu <ul style="list-style-type: none"> • Treaty Settlement Statutory Obligations • Iwi Environmental Management Plan • Cultural Impact Assessments (on file) • Cultural Values Assessments (on file) • Department of Conservation: Conservation Management Strategy • Takutai Moana – Marine and Coastal Claim(s)

	<p>k. Ngāti Wae Wae</p> <ul style="list-style-type: none"> • Treaty Settlement Statutory Obligations • Iwi Environmental Management Plan • Cultural Impact Assessments (on file) • Cultural Values Assessments (on file) • Department of Conservation: Conservation Management Strategy • Takutai Moana – Marine and Coastal Claim(s) 	
Clr Edgar asked for	NRSBU infrastructure costs and whether we need to consider these? Capacity of Bell Island treatment plant	See notes below table from meeting with NRSBU IN SCOPE
	Does FDS only need to cover 30 years? Or longer?	<p>The purpose of the FDS is to “provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand” as defined by the NPSUD. This links with the definitions of short, medium & long term in the NPSUD and the demand projections in the HBA that the FDS is based on.</p> <p>Legally, the FDS could cover a longer timeframe, however, this is not the intent of the NPSUD. IN SCOPE</p>
	Summary of project funding for Maitai (?)	<p>Funding for the infrastructure required for the Maitahi Plan Change 28 area is not included in the last LTP and would need to be included in a future LTP. IN SCOPE</p>
David Bartlett	<p>Greenfield versus intensification uptake – how can we encourage intensification if we are allowing greenfield? How does one affect the other?</p> <p>Clr Edgar (day two) – Urban rural boundaries and their effects</p>	<p>The Councils have a range of tools available to it to encourage intensification. The first and most significant is to ensure that intensification is enabled by the Resource Management Plans. Intensification cannot occur to the levels indicated in the FDS if the rules in the plan do not allow it, without going through a resource consent</p>

		<p>process. Infrastructure investment is critical, as is streamlined consenting and approval processes.</p> <p>The Councils' intensification action plans detail a range of other methods available to support intensification.</p> <p>Applying a Rural Urban Boundary is an option available to the Council through their Resource Management Plans. It is a complex method that requires careful balancing and analysis through a s32 analysis under the RMA. This is discussed in the Barker's Analysis Report (appended to the Deliberations Report) section 7: Greenfield / Brownfield Split.</p> <p>IN SCOPE</p>
Mayor Reese & Cllr McGurk	Has the Intergovernmental Panel on Climate Change (IPCC) report been taken into account in the MCA?	<p>The outcomes and MCA, as well as the Councils' hazards modelling (used for the opportunities and constraints mapping), for example flood hazards, include projected climate change effects such as increased rainfall and sea level rise.</p> <p>The FDS has been developed under the NZ RMA framework and the Government will soon be releasing additional climate change policies, National Adaptation Plan and Emissions Reduction Plan that the Councils will need to implement through future FDS reviews or a Regional Spatial Strategy.</p> <p>Please see comments on page 16 below on sea level rise</p> <p>Out of scope</p>
Ina Kara-France asked for Joseph Blessing	Healthy Homes research by Pinnacle housing (provide) Ina wanted clarification on how we have considered co-housing and papakainga in the FDS?	<p>Opportunities for development on Maori land identified through various hui.</p> <p>Enablement for papakainga to be addressed through Plan Changes & Plan reviews.</p> <p>The TRMP currently enables co-housing, as evidenced by the development under construction in Takaka.</p> <p>IN SCOPE</p>
Cllr Edgar asked for	Growth demand in Saxton described as low, by Jane Hilson for the Raine submission –	<p>Refer to Capacity Calculations memo (appended to the Barker's Analysis Deliberations Report) section 2.</p> <p>IN SCOPE</p>

Ian McComb/Rebecca Hamid Mayor Reese	clarification of this? Also how have we taken demand into account spatially in the FDS? Councils need to take a whole system approach to intensification. Forget about reducing DCs, get on with doing your stormwater models, map secondary flow paths, do Geotech studies, transportation assessments, consent staff resources. Have this modelling info available for developers at an extra fee and that will reduce their development costs. This may help achieve intensification targets. Mayor Reese - Scope of influence of FDS and tools needed to implement FDS? Legal impediments and opportunities to influence its outcomes. Building types, greenhouse gas emissions Mayor Reese (day 2) - Living standards framework and other docs we need to take into assessment and how do they fit with NPS UD? How does suite of govt policy relate to implementation of FDS? Holistic approach to development	See both Councils' Adopted Intensification Action Plans 2020. These are about removing barriers to intensification through process and need to be reviewed following the 2022 FDS as part of the implementation plan that needs to be prepared jointly by both Councils. See further responses to the questions above regarding the tools available to Council to support intensification. These are consistent with the points made by the submitter. IN SCOPE
	Clarification over instability (slump) problems in Tahunanui.	The hazards information on the GIS viewer incorrectly omitted the Tahunanui Slump area. This has now been rectified and the capacity calculations have been adjusted. See Capacity Calculations memo (appended to the Deliberations Report) section 3 .
Kainga Ora Mayor Reese	BECA said there have not been discussions with Kainga Ora on the draft FDS. Explain how we have ended up so far apart if we have engaged?	Zoom meeting 22 nd Nov 2021 with B&A consultants and Kainga Ora – with Mel Rountree – Team Leader Development Planning, (Christchurch based), Julia Campbell – Regional Director – Nelson, Lorellin Syben – Manager Community Engagement and Partnerships, (Nelson based), Josh Neville – Senior Development Planner, (Christchurch based)

		<p>Kainga Ora attended the small stakeholder webinar for the draft FDS on 22nd March with Mel Rountree and Rob Graham in attendance. The project team offered to meet with Kainga Ora and other stakeholders 1 on 1 to discuss any specific feedback or concerns. This opportunity was not taken up by Kainga Ora but it was by others e.g. Waka Kotahi.</p> <p>IN SCOPE</p>
Mayor Reese	Expert engagement with Kainga Ora and FDS team asked for. What do we agree on and what disagree on?	<p>First meeting held 29th April – Second meeting 6th May. Refer to meeting minutes and email correspondence.</p> <p>Kainga Ora's experts had not reviewed the technical information informing the draft FDS.</p> <p>IN SCOPE</p>
Kainga Ora	Staging and sequencing of sites – why can't we provide this in the FDS?	<p>The FDS can include staging, but there are reasons why we have not recommended this approach.</p> <p>Refer to Barker's Analysis Report (appended to the Deliberations Report) section 10: Staging of Development.</p> <p>IN SCOPE</p>
Kainga Ora Requested by several members of Sub Committee	<p>Lack of infrastructure planning (Kainga Ora), not evidenced sufficiently. What infrastructure is already in our LTP?</p> <p>Nayland South extension proposal by K-O</p> <p>Coastal hazards and SLR not addressed</p> <p>Addressing NPS HPL?</p> <p>Property Economics analysis (uplifted land and contradictions with NPS UD)</p> <p>Analysis of uptake rate of intensification.</p> <p>Tahunua slump zone – scale of the slump?</p>	<p>Refer to meeting minutes from B&A meeting with Kainga Ora 29/4/22, and Barker's Analysis Report (appended to the Deliberations Report) section 3: Approach to Calculating Capacity incl. Uptake Rate.</p> <p>Kainga Ora agreed in subsequent discussions that detailed staging and infrastructure planning does not need to sit within the FDS.</p> <p>Coastal hazards and SLR have been addressed in the mapping, MCA and outcomes. The NPS HPL has not been released yet. The MCA includes consideration of HPL. Outcome 10 is to prioritise HPL for productive purposes.</p> <p>The FDS maps on infrastructure focussed on trunk infrastructure needed that is not already in our Long Term Plans</p> <p>IN SCOPE</p>

Cllr Edgar	Tahuna advertised differently in press to what the proposals are, then changed?	There were errors and mislabelling issues and in one of the four pieces of advertising it referenced Nelson City Centre and Nelson South rather than Tahunanui. However, the public notice and 3 of the 4 advertisements as well as the FDS document itself, reference Nelson which includes Tahunanui. The FDS is intended as a growth strategy for the whole of the Nelson and Tasman area so the advertising reflected that. Not every suburb was mentioned by name in the advertising material as this would not have been feasible while still being effective advertising. IN SCOPE
Ina Kara-France	Coastal adaptation plan – do we have a strategy in place for this? Provide what we have.	Complete – see TDC details below. The coastal adaptation project is in its inception with no information relevant to the FDS available yet. Nelson is undertaking further work using the Dynamic Adaptive Pathways Process. IN SCOPE

Request for Residential BC data by town last 3 years

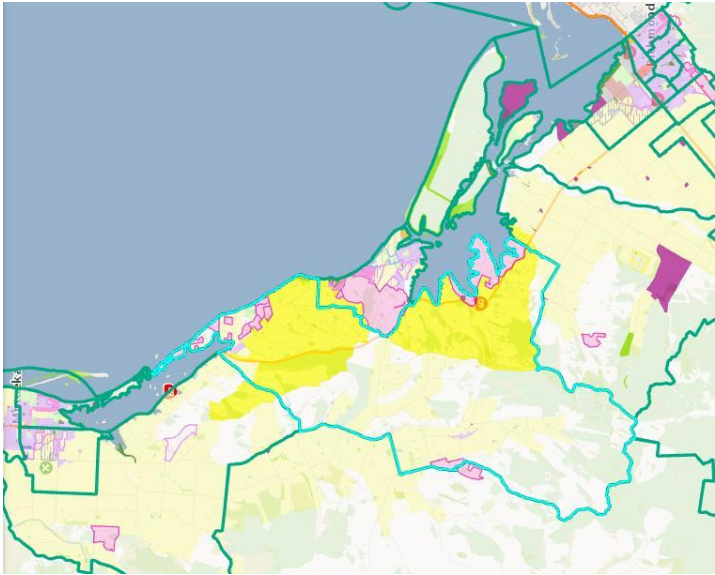
CONSENTED NEW RESIDENTIAL BUILDINGS				
YEAR ENDING DECEMBER	Dec-19	Dec-20	Dec-21	
Total Nelson and Tasman	812	803	768	
Nelson	312	253	246	
Tasman	500	550	522	
Richmond	262	275	271	
Richmond West	181	207	192	
Richmond South	32	13	33	
Rest of Richmond	49	55	46	
Motueka	51	32	16	
Mapua	19	30	29	
Brightwater	4	39	23	
Wakefield	28	15	33	

Moutere	62	81	69
Moutere Hills	56	70	60
Golden Bay	28	26	34

Data is based on Stats NZ SA2 Statistical Areas which can be viewed here: [Geographic Boundary Viewer \(arcgis.com\)](https://arcgis.com)

Moutere includes Lower Moutere and Moutere Hills SA2 area.

The following map shows the location of the Moutere Hills SA2 area outlined in blue, which includes most of the Rural 3 Zone:



Sea level rise projections

Ministry for the Environment released national sea level rise projections in 2017 via their Coastal Hazards and Climate Change Guidance (based on IPCC's 5th Assessment Report). The Guidance outlines the approximate years, from possible earliest to latest, when specific sea level rise increments (in metres above 1986-2005 baseline) could be reached for various projection scenarios of sea level rise for the wider New Zealand region, as shown in the table below.

Table 10: Decadal increments for projections of sea-level rise (metres above 1986–2005 baseline) for the wider New Zealand region (for the four future scenarios from figure 27)

NZ SLR scenario	NZ RCP2.6 M (median) [m]	NZ RCP4.5 M (median) [m]	NZ RCP8.5 M (median) [m]	NZ RCP8.5 H* (83rd percentile) [m]
1986–2005	0	0	0	0
2020	0.08	0.08	0.09	0.11
2030	0.13	0.13	0.15	0.18
2040	0.18	0.19	0.21	0.27
2050	0.23	0.24	0.28	0.37
2060	0.27	0.30	0.36	0.48
2070	0.32	0.36	0.45	0.61
2080	0.37	0.42	0.55	0.75
2090	0.42	0.49	0.67	0.90
2100	0.46	0.55	0.79	1.05
2110	0.51	0.61	0.93	1.20
2120	0.55	0.67	1.06	1.36
2130	0.60*	0.74*	1.18*	1.52
2140	0.65*	0.81*	1.29*	1.69
2150	0.69*	0.88*	1.41*	1.88

* Extended set 2130–50 based on applying the same rate of rise of the relevant representative concentration pathway (RCP) median trajectories from Kopp et al, 2014 (K14) to the end values of the Intergovernmental Panel on Climate Change Fifth Assessment Report (IPCC AR5) projections. Columns 2, 3, 4: based on IPCC AR5 (Church et al, 2013a); and column 5: New Zealand RCP8.5 H* scenario (83rd percentile, from Kopp et al, 2014). Note: M = median; m = metres; NZ = New Zealand; SLR = sea-level rise. To determine the local SLR, a further component for persistent vertical land movement may need to be added (subsidence) or subtracted (uplift).

Source: [coastal-hazards-guide-final.pdf \(environment.govt.nz\)](https://environment.govt.nz/coastal-hazards-guide-final.pdf)

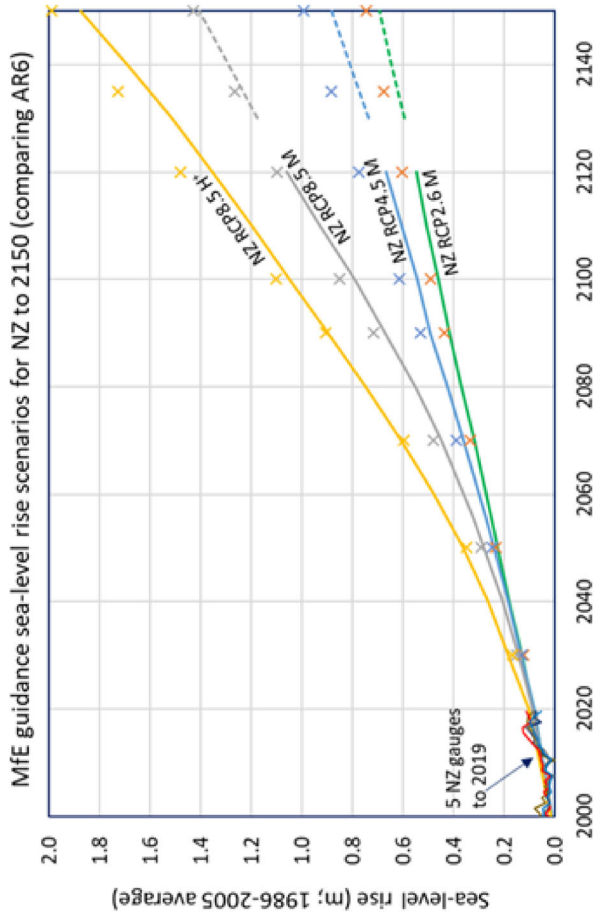
The representative concentration pathways (RCPs) listed are four comparable scenarios used to predict how future global warming may contribute to climate change and sea level rise. The lower scenario (RCP2.6) represents the rise in sea level if the Paris Agreement was achieved, namely to keep the global average temperature well below 2° C above pre-industrial levels, while pursuing efforts to limit the temperature increase to 1.5° C. The upper scenario (RCP8.5 H+) represents continuing high emissions and no effective emissions mitigation, plus runaway instabilities in polar ice sheet melting. The other two scenarios (RCP8.5 and RCP4.5) are in between those two different futures.

Given that the rate and magnitude of future sea level rise is uncertain, all four RCP scenarios should be considered in relation to council activities and work programmes. Each increment of sea level rise will depend on the rate of future global warming and climate change.

It is noted that IPCC released updated sea level projections in August 2021 (6th Assessment Report), and it is the understanding of staff that NIWA is updating the projections for the New Zealand context - this in turn will inform MfE's table above (see: NZ SeaRise Programme). Dr Rob Bell provided TDC staff the following graph which compares the 2017 MfE guidance (solid lines) against IPCC's updated data (crosses) which indicates generally slightly higher rates of sea level rise than previously forecast.

Recent updates on predictions

-IPCC 6th Assessment Aug 2021 (Science Basis Report)



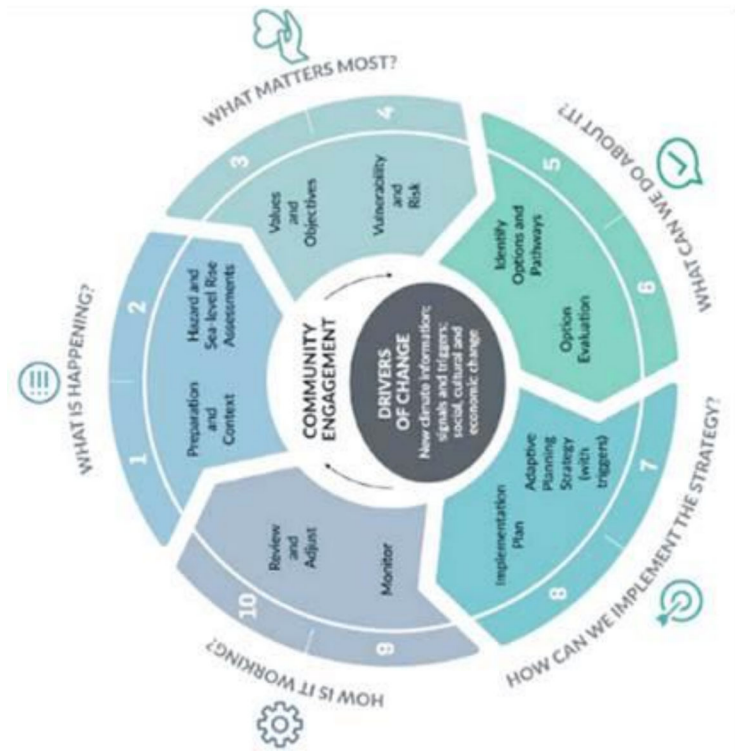
NZ SeaRise: Te Tai Pari O Aotearoa programme

In early May, this programme released location specific sea level rise projections out to the year 2300 for every 2 km of the coast of Aotearoa New Zealand. These projections can be accessed through a [new online tool](#), which illustrates sea-level rise and vertical land movement (VLM) incorporated under potential climate change scenarios. NZ SeaRise is a 5 year project funded by MBE's Endeavour Fund. It brings together 30 local and international experts (including scientists from GNS Science, Niwa and Victoria University) to improve projections of sea-level rise in Aotearoa New Zealand. The new projections will inform MfE's national adaptation plan and will be used to help develop an update of MfE's 2017 Coastal Hazards and Climate Change Guidance.

Staff are yet to fully assess this new data and how it may compare to the work we have completed to date on sea level rise and our understanding of vertical land movement (as advised by Beca from work commissioned in 2019). Certainly this national dataset adds to our understanding of coastal hazards and sea level rise and staff welcomes further guidance from MfE on how to use this work to inform local adaptation planning. It is understood that guidance will be forthcoming in the following weeks.

- a Coastal adaptation plan and whether we have a strategy in place for this? Asked to provide what we have.

Both Tasman and Nelson Councils are working on the development of long-term adaptation plans for coastal hazards and sea level rise, following best practice as set out in MfE's Coastal Hazards and Climate Change Guidance 2017. As recommended in the guidance, development of the adaptation plans are multi-year projects as it requires working in partnership with our communities, iwi, and the scientific community. The guidance sets out the following 10 step decision-making process:



To date, both councils have developed and published coastal hazards and sea level rise mapping (see [Tasman mapping](#) and [Nelson mapping](#)) and are now at different stages within steps 3 – 5 within the framework. This work considers values and objectives, vulnerability and risk, and options for coastal management. Tasman is currently slightly further ahead than Nelson in relation to their work programme, and has published a Tasman [Coastal Risk Assessment](#) (2020) and in 2021 undertook community engagement on [high level options for coastal management](#). Climate change and adaptation planning is extremely complex and challenging for all of New Zealand, as well as globally. Both Councils are awaiting national guidance from central government which will strongly influence next steps in our work programmes, including RMA 1991 reform and the National Adaptation Plan (a draft of this is now out for consultation).

For more information see:

- [Tasman Coastal Management Project](#)
- [Nelson Coastal Hazards](#)

Both Councils have also adopted climate action plans which set out our commitments to address climate change, including mitigation and adaptation actions.

The recently released draft [National Adaptation Plan](#) emphasises how, “It is important for us to try to reduce existing risk so the chances of disaster are reduced, and/or the impacts are reduced when events occur. We also need to recognise how we can inadvertently add to risk through poor development choices, including land-use and building choices. Planning for resilience at the outset of new projects is by far the cheapest and easiest time to minimise risk and has the potential to significantly reduce disaster costs in the future” (page 10). “System-wide reforms will encourage a long-term and proactive view to account for climate change. For example, **resource management reform** will support effective spatial planning by promoting development in areas away from climate-related hazards. It will also set out a framework to manage retreat and relocate communities, homes and buildings where risks are seen as unacceptable.” (page 60).

Through the FDS the Councils are promoting sustainable growth by not encouraging new development in low lying coastal areas, therefore reducing risk to our communities from coastal hazards and climate change. RMA reform will enable a more joined up approach to managing the significant risks from natural hazards and the proposed Climate Adaptation Plan will address the complexities of managed retreat.

Nelson Regional Sewerage Business Unit

NRSBU is currently preparing a 50 year master plan but they will incorporate the FDS next July when it is settled in their plan. They are hoping to have their draft master plan for consultation complete by the end of 2022.

NRSBU is currently doing renewals on infrastructure, to enable unused pipes to be used (with new sleeving). This will provide capacity up until approximately 2040 (with 50% increase in sewage flows) and will be complete by end of 2023. It tries to address the current capacity problems between Richmond and Bell Island. The capacity modelling this is based on is the flow numbers provided by TDC and NCC engineers (in the case of TDC these are based on the 2019 FDS)

NRSBU is considering new infrastructure – new pipe to wastewater treatment plant down Lower Queen St and via rally car racing site, out to Bell Island. Needed when reach 730-780 litres/sec from Beach Rd around approximately 2040. This will signal the need for a new main in advance to the councils and the \$40M it would cost. If the Councils were to favour future growth in the FDS in the form of a new community near Tasman village instead this may push the need for this pipe out a little bit, but it would depend on how successful I&I management is by the Councils.

If the Tasman village expansion was favoured—sewage would be a community scheme, then it would connect to the Motueka reticulation and, therefore, not go to Bell Island.

Councils' SH6 growth corridor fits with the NRSBU plans to pipe the sewage to Richmond and then out to Bell Island. NRSBU has expressed concern about the resilience of that network (single corridor) and has suggested TDC consider an alternative route for some flow from Brightwater/Wakefield down Waimea Rd.

There is 50-80 year capacity at Bell Island, due to sea level rise implications. Moturoa/Rabbit island protects Bell Island to some extent. However the Council will be looking for a new inland treatment plant at some point (NRSBU considering this as part of their draft master plan).

No real limit on capacity to Bell Island. Relaxed about more growth being added. From a long perspective, the Councils could increase capacity of Bell Island to double what it is now. The primary constraint at Bell Island is peak flow in wet weather (L&I control).

- NRSBU manages NCC's waste from about Bishopdale onwards
- Fittal St pump station is in an inundation zone and the Council is trying to move it to higher ground. The pump station failed in cyclones Gita and Fehi. Sceptic tanks from Tasman's Rural 3 get dumped here, then pumped to Bell Island for further treatment. NRSBU are keen to secure a new site in this AMP cycle for future relocation of the pump station to higher ground.

To date, both Councils have developed and published coastal hazards and sea level rise mapping (see [Tasman mapping](#) and [Nelson mapping](#)) and are now at different stages within steps 3 – 5 within the framework. This work considers values and objectives, vulnerability and risk, and options for coastal management. Tasman is currently slightly further ahead than Nelson in relation to their work programme, and has published a Tasman [Coastal Risk Assessment](#) (2020) and in 2021 undertook community engagement on [high level options for coastal management](#). Climate change and adaptation planning is extremely complex and challenging for all of New Zealand, as well as globally. Both Councils are awaiting national guidance from central government which will strongly influence next steps in our work programmes, including RMA 1991 reform and the National Adaptation Plan (a draft of this is now out for consultation).

For more information see:

- [Tasman Coastal Management Project](#)
- [Nelson Coastal Hazards](#)

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Information requests from the Subcommittee for day two of hearing (28th April 2022)

Related submission/ source of request	Information Request	Who is actioning/response
31345 and others	Scope of FDS to rezone land – clarify in the report. What does a site being part of the FDS mean?	The FDS does not rezone land. It indicates sites that may be appropriate for rezoning in the future which would be proposed and consulted on through the Councils' Resource Management Plans. IN SCOPE
Joni Thomsett	Is there a Motueka South Structure Plan? What are the plans for this area? Sea level rise ok for site T-190?	There is no structure plan for Motueka South (or Motueka West as TDC has named it). The land is currently zoned rural 1 deferred residential (deferred for servicing). The landowners are Wakatu incorporation and NRAIT. The rules relating to the zoning are currently being reviewed to enable higher density housing than that originally envisaged, reflecting the 2019 FDS site. TDC staff are working with the landowners in this respect. Sea level rise – under a 1.5m SLR the site is not affected. The vast majority of the site is outside the mapped extent of a 1.5mSLR + 1% Annual Exceedance Probability storm tide scenario. Site T-190 is also above the estimated +2.0m SLR + 1% AEP storm tide scenario. Additionally we have flapgates at Wharf Rd which dampen effects of tidal inundation when closed, as they allow the estuary area behind Wharf Rd to act as a large storage basin. IN SCOPE
	Mixed use zoning of Queen Street – there was a proposal within TDC to have mixed use on south side of Queen Street – where is that or wasn't it considered as part of this process?	The FDS will amend the Richmond town centre to show Mixed Use, consistent with its centre status. Refer to the Barker's Capacity Calculations memo (appended to the Deliberations Report) section 3 . IN SCOPE
Hattersley	Status of consents at Tasman village – productive land status of the sites T-166 to T-168 and T-136.	Productive land status: <u>T-166 Tasman Bay Village</u> : Scores 1, significant loss of productive land (Land Use Capability (LUC) 3). Large titles not fragmented, relatively flat, some is north facing and surrounding use is horticulture. In the original Productive Land Classification (PLC) the entire area is classified as B (Highly Productive Land (HPL)).

	<p><u>T-167 Tahimana, Stagecoach Rd:</u> Not productive land (No LUC 3, only a very small area of HPL under the PLC within the site), steeper little flat, gullies scores 4.</p> <p><u>T-168 303 Aporo Road:</u> Scores 1, entire site is productive land (LUC 3).</p> <p><u>T-136 Malcolms Tasman View Road and Braeburn Road block:</u> Scores 4 (Not HPL under LUC or PLC), too steep to be classed as productive. Gullies etc. Grazing currently.</p> <p>General methodology used for the Productive Land Criterion: Refer to criterion 10 description in MCA.</p> <p>The data layers Mirka Langford (Senior Resource Scientist at TDC) used to make the assessment were as given in the criteria: LUC mapping, TDC HPL (1994) mapping and existing rural residential boundaries. The TDC HPL 2021 was not available at the time.</p> <p>Mirka Langford also looked at landscape and other restrictions such as proximity to rivers, highways, steep slope which would influence parcel sizes and fragmentation to make an assessment against the definition for each scoring parameter.</p> <p>Consent history - The relevant one for site T-168 is the original Decision RM150576 issued on 19 Dec 2016 and which lapses 10 years after that. As per Condition 2 of RM150576. Only part of that consent has been implemented on the seaward side of Aporo Rd. It is entirely up to the consent owner whether they implement the remainder of the consent, apply for an extension of the lapse period (an additional 3 years), or let the consent lapse and then apply for new consents instead.</p> <p>IN SCOPE</p>
	<p>TACA were sent an email (from the TDC FDS email address) on the 29/9/21, on the FDS process, detailing the October 2021 Community Engagement (including the webinar links).</p> <p>TACA were sent another email (from Myaan Bengosi, TDC) on the 14/02/21 to provide information on the public consultation dates, and to organise a date and</p>

		time to hold a public consultation webinar with TACA. Steve Richards confirmed he was happy for the FDS team to hold the TACA webinar on the 30 March 2022. IN SCOPE
Falcon Ridge Estate Cllr Bryant	Are we looking to rezone the land to rural residential here, as proposed in submission? Infrastructure implications?	Rural residential so little servicing required. The site will be fully assessed using the multi criteria analysis. See Capacity Calculations memo (appended to the Deliberations Report). IN SCOPE
Cllr Edgar	T-163 – Impact on Keoghan road (transportation) of this site	The proposed development is 6km from Takaka and is made up of 52 rural/residential dwellings proposed in this area. Most residents will use their cars and use Takaka as their main town centre. The development will utilise Keoghan Road which is unsealed and will need to be upgraded to a sealed road for the development to proceed (approximately 340m). The intersection at Rangihaeata Road and Takaka-Collingwood Highway will not need any change. The number of residents won't trigger any other major road improvements for vehicles. The distance is not too far that bicycle cannot be used, but the Highway has some areas where the shoulders are narrow and are points of concern for cyclists. The route also has some hills making it less desirable for commuting by the general public. There is no dedicated cycling infrastructure, although the Golden Bay community has been strongly advocating for an improved cycling route between Takaka and Rangihaeata. Note: This is state highway and administered by Waka Kotahi. IN SCOPE
Cllr Edgar NM Health	Different outcomes suggested to ours.	These are the agreed outcomes of the draft FDS put together by the project team, the community (engagement round Oct 2021), iwi, stakeholders and the Councils. The purpose of the FDS consultation is to seek feedback on them. IN SCOPE
	Incorporating mixed use – outline where in the FDS we are proposing mixed use	See response to similar question above. Amended to show mixed use and capacity calculations have been updated. See Capacity Calculations memo (appended to the Deliberations Report) section 3 . IN SCOPE
	More explicit about the public transport (PT) changes that are coming into play next year	PT will go into Richmond West to a park n ride at the Connings site (SH60/McShane Rd junction) and another Park n ride at White Rd/SH6 junction. These are in the

	as FDS currently vague, lots of submitters mentioned this	<p>Richmond Programme Business Case. The White Rd park n ride could also work for the Hope bypass too if it went ahead. It's a long term project 10 yrs plus, may never happen.</p> <p>We are making SH6 the main vehicular route north to south and other north to south routes in Richmond will be prioritised for pedestrians and active transport.</p> <p>Intensification T22, T112 all fits in well with the transport strategies, supported. See the TDC walking and cycling strategy Draft Walking and Cycling Strategy Tasman District Council</p> <p>PT service to Brightwater starts 2023. Frequency could increase with growth.</p> <p>PT along SH6 to Pitfour, stopping at Edward St.</p> <p>The plans in the draft FDS can be amended to show the public transport connections more clearly on a separate plan with a separate discussion on it in the text.</p> <p>IN SCOPE</p>
NM Health	Light industrial site proposed in Hope – assessment and whether other areas better eg Business park suggested by Raine landowner?	<p>The FDS has suggested business land at site T-35, it hasn't said light industrial. Submitters have somehow thought it will be light industrial. The most likely business type here would be mixed business, similar to the existing mixed business zone in Richmond West. However there have not been any detailed discussions on this yet.</p> <p>Initial engagement on the Richmond South Plan Change has indicated demand for – incubator units for robotics, food tech, precision engineering, some warehousing and distribution, small business start up premises and larger business premises.</p> <p>IN SCOPE</p>
NM Health	How does the FDS support affordable housing?	<p>There are many factors affecting the price of housing, including value of land, cost of building materials, banks finance lending policies, availability of skilled labour. The Councils alone cannot control the affordability of housing, but one thing we can do is to ensure that we have enough zoned and serviced land available for housing to meet demand, even in a high growth scenario. The FDS is the first step in identifying areas that may be suitable for growth/intensification.</p> <p>IN SCOPE</p>
Tim Bayley	Comments on maps for Nelson being unclear	<p>The maps themselves were not incorrect as claimed by the submitter. The maps in the online GIS viewer showed the boundaries of each area. The maps in the FDS document showed the boundaries of the recommended building heights with the FDS area labels placed in the general area.</p>

		<p>The final FDS document will have the boundaries of the FDS areas included on maps.</p> <p>IN SCOPE</p> <p>Refer diagram on Page 4 of the FDS Consultation Summary document– the TDC Growth Plan Change is a change to one of the Council Plans and Strategies – a change to the Tasman Resource Management Plan.</p> <p>Early engagement on the growth plan change is happening at the same time as the FDS consultation, but is subject to a separate process. Growth Plan Change site boundaries have been adjusted as a result of the Growth Plan Change feedback period and evaluation. For those Growth Plan Change sites that are in the FDS, we are proposing to realign boundaries.</p>
Dominic Williams Cllr Bryant	Why is his property dissected as part of T-001	<p>It was drawn back in 2018, as this site was part of the 2019 FDS and we were trying to avoid the submitter's own property while forming a new development area. FDS boundaries are very rough, the boundaries become refined at rezoning stage. We have reassessed the site including the submitter's whole property using the MCA.</p> <p>IN SCOPE</p>
Mayor Reese	Tim Bayley – issues raised re Nelson maps in draft FDS and GIS viewer – please clarify	<p>The maps themselves were not incorrect as claimed by the submitter. The maps in the online GIS viewer showed the boundaries of each area. The maps in the FDS document showed the boundaries of the recommended building heights with the FDS area labels placed in the general area.</p> <p>The final FDS document will have the boundaries of the FDS areas included on maps.</p> <p>IN SCOPE</p>
Cllr McGurk	Can we have an opinion from officers regarding decision from the recent Rolleston residential rezoning case https://www.stuff.co.nz/the-press/news/128361469/bid-to-build-2100-new-homes-in-canterburys-rolleston-turned-down	<p>There were site specific reasons for declining this application relating to reverse sensitivity effects and the site not being identified in the strategic plan. Further issues related to the density of the proposal and the view of the panel that it would not support compact urban form objectives of the RPS. In our view, the decision is not particularly relevant to the draft FDS.</p>

Cllr Edgar Submission 31776	Reference to “extension” in Bayview submission	The area described is included as background rather than suggested as an additional FDS growth area. Staff are following up with the land owners on this matter to confirm. IN SCOPE
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Information requests from Subcommittee day three of hearing (29th April 2022)

Related submission/ source of request	Information Request	Who is actioning/response
	Consideration of wildlife corridors and biodiversity in the FDS	Criterion 13 in the MCA covered terrestrial ecology and biodiversity. Each site was assessed by appropriately skilled staff. Please see the FDS technical report for more information. IN SCOPE
	MCA – have we assessed reverse sensitivity or land use compatibility?	Criterion 10 in the MCA covered reverse sensitivity and human health effects. Please see the FDS technical report for more information. IN SCOPE
	Do we need to consider the Zero Carbon Act?	Yes, to the extent that the legislation directs. The Government’s Carbon Emissions Reduction Plan is a key relevant output of this legislation that would inform Council plans, strategies and actions. The Government is set to release a draft of this plan later in May. Refer to Barker’s Analysis Report (appended to the Deliberations Report) section 7: Climate Change and Emissions Reduction , as well as the VKT’s work completed by TDC. IN SCOPE
Bruno Lemke Cllr McGurk	Mapua - LOS for parks and reserves and amenity – in relation to intensification, how	The submitter is incorrect. It is not 5% of the land that is set aside for reserves. This is a mis-interpretation of a rule in the TRMP that requires 5.62% of the value of

	does the 5% work if it is an intensification area?	<p>additional lots created to be paid as a Reserve Financial Contribution, which can be taken as land, monetary contribution, or both.</p> <p>The levels of service for reserve provision are:</p> <ol style="list-style-type: none"> 1. At least 85% of properties zoned residential are located within 500m of open space. Currently all residential zoned land in Mapua is located within 500m of open space 2. Total area of parkland provided by the Council exceeds the minimum of 4ha per 1,000 residents required by the TRMP. Current provision district wide is 15.0ha per 1,000 residents, <p>This level of service is relevant whether brownfield or greenfield land (including intensification)</p> <p>IN SCOPE</p>
	Amenity – shade and sun effects? Are those rules adequately met within our RMPs or are rule changes required?	<p>Comments relating to Resource Management Plan rules and regulations are outside the scope of the FDS. They will be addressed through the review of the Councils' Resource Management Plans, both of which are underway.</p> <p>Out of scope</p>
	Affordability of intensified options – not cheaper and locally seem more expensive; If intensification is to support affordability, what are the conditions that support that?	<p>Development in other cities where more intensive housing forms are common show that a range of price points are offered, from high end apartments to more affordable duplex and walk-up apartments.</p> <p>Apartments are not enabled extensively in Nelson or Tasman's resource management plans. They are typically enabled in higher value areas, like the City Centre and Richmond town centre where the market is delivering more premium product. If higher density is enabled more extensively across the region, the potential for affordable options to be developed is much greater.</p> <p>IN SCOPE</p>
31457	Carrying capacity study – have we done this?	<p>Resource management is often too complicated to do this analysis effectively. To assess what "carrying capacity" would be appropriate to avoid any adverse effects on the natural environment would mean that we would need a much more complete knowledge of the 'cause and effect' of, not only particular land uses, but also of particular activities on that land use. Our knowledge through research (particularly from CRI's and universities) and Council monitoring has steadily grown over the last few decades. Some relationships between land uses or activities and a particular</p>

		<p>environmental condition have an inflection point that results in a “tipping” into a more degraded state. This makes establishing limits much more straight forward. However, most relationships of this nature have linear or curvi-linear relationships with no tipping point.</p> <p>So, it comes down to our community deciding the values and outcomes we want and compromises that we can tolerate. There are many different factors in this. This means that we need to use modelling to understand the situation more fully. Some modelling has been done and we are using that to address the issues.</p> <p>IN SCOPE</p>
	Do we have to meet demand of housing?	<p>In short – yes.</p> <p>Section 31 RMA Functions of territorial authorities under this Act (1)</p> <p>Every territorial authority shall have the following functions for the purpose of giving effect to this Act in its district:</p> <p>...(aa)</p> <p>the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district.</p> <p>National Policy Statement Urban Development:</p> <p>Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.</p> <p>IN SCOPE</p>
Heslop	T-114 (216 Champion Road, Richmond) has higher capacity potential – true?	<p>Site T-114 (Richmond) is partly zoned Rural 2 and deferred Rural residential. However, the landowner asked for the site to be considered in the draft FDS for a denser development that is serviced, totalling 264 lots. Lot sizes vary from 500 sqm to 1250 sq m). That is what has been assessed.</p> <p>IN SCOPE</p>

Jack Bauer	Site T-17 has higher capacity potential – true?	Site T-17 (near Mytton Heights, Motueka) was assessed in the 2019 FDS and was assessed for rural residential densities. There is no servicing in this area. The landowner did not ask staff to assess it for higher densities. IN SCOPE
Cllr McGurk	Incentives and disincentives for intensification – commentary on DC policy?	See intensification action plans of both councils 2020. Partly out of scope, however, the development contributions policy can be reviewed/updated, and this can be signalled through the annual implementation plan for the FDS. Both councils already offer substantial discounts on DCs. E.g. this applies to smaller homes. Note that development contributions are a small overall portion of development costs. Land and holding costs are more significant, consistent with the advice from submitters at the hearing. Ensuring land and development markets are competitive and consenting processes are streamlined and fast will be more effective tools to incentivise intensification, assuming that the Resource Management Plans can be amended quickly to enable intensification to occur. PARTLY OUT OF SCOPE
	Infrastructure required in Nile St and Milton St area for Kaka valley site – is it in the LTP, summary of requirements and what is planned for?	Funding for the infrastructure required for the Maitahi Plan Change 28 area is not included in the last LTP and would need to be included in a future LTP. IN SCOPE
	BRE standards for emissions reduction (Lindsay Wood) – can we have a copy? NPS on electricity transmission	Dr Lindsay Wood says - We are actively engaged in applied research in various related areas, such as assisting BRANZ in project work, and being at an advanced stage of development of a high-functionality tool for estimating the greenhouse gas emissions associated with construction projects. (Interim information is at https://www.resilienz.co.nz/clearcut). The BRANZ research was circulated post hearing. The tool is not suitable for analysis purposes as it relates to individual buildings and building materials etc. The FDS is a strategic document and it needs a strategic tool to evaluate carbon emissions. The analysis undertaken by TDC on VKTs provides information on this matter, and is detailed in the deliberations report.

		<p>We understand that the Government will be making tools available as part of its Emissions Reduction Plan. Government agencies, including Waka Kotahi are unable to provide information on this tool that would assist the deliberations panel. Any Government tools that are developed to assist Councils would be available to inform future reviews of the FDS or a Regional Spatial Strategy.</p> <p>The NPS on Electricity Transmission is concerned with protecting nationally significant transmission networks. Although Council's plans can support local renewable energy, this is better addressed through the Councils' Resource Management Plans. No other spatial plan or FDS that we are aware of addresses this issue for that reason.</p>
Cllr Bryant	<p>Site T-136 – are we going to consider this? Seek further info on it if so</p>	<p>Addressed in Officer's deliberations report – theme 7 "Proposal for a new community near Tasman village"</p> <p>IN SCOPE</p>
	<p>Adjoining neighbour to T-136 who spoke yesterday, what are the effects on them if it went ahead?</p>	<p>Comments relating to Resource Management Plan rules and regulations are outside the scope of the FDS. They will be addressed through the review of the Councils' Resource Management Plans, both of which are underway.</p> <p>OUT OF SCOPE</p>
Submitter 31806	<p>Graeme Dick referred to another 1500 ha for rural res, during his presentation, are we considering this?</p>	<p>Meetings were held with the submitter as part of the first round of engagement for the FDS and this and other sites have already been assessed for the 2022 FDS. Large site T-169, sites T-128 and T-127 have all been assessed but did not progress to the final FDS. Please see technical report pages 79-86 for reasons why.</p> <p>IN SCOPE</p>
	<p>Effect of cost of council charges on devt? Average across the Districts</p>	<p>Work undertaken for the Richmond Intensive Development Area Plan Change in 2018, which included advice from valuers and developers found Council charges on the whole development were typically 7-8% of all costs, comprising Development contributions, reserve financial contributions and connection fees</p> <p>PARTLY OUT OF SCOPE</p>

Information requests from Subcommittee day four of hearing (3rd May 2022)

Related submission/ source of request	Information Request	Who is actioning/response
Mayor Reese	What are the legislative requirements about delivery of an updated FDS? What happens if we hold off until a spatial plan is done?	<p>The FDS is in essence a high level spatial plan. The NPSUD (clause 3.16) requires the Councils to regularly review its FDS to inform its Long Term Plans, and provides three yearly intervals as a guide. An FDS must be prepared every six years.</p> <p>The 2022 FDS could be put on hold until the Regional Spatial Strategy, however, this creates significant risks for unplanned and ad-hoc development to occur in a way that is not integrated with infrastructure. It also assumes the current government will pass its RMA reform through Parliament. Having an NPS UD aligned strategic plan provides a sound foundation for informing the 2024 LTPs and Plan Changes and Resource Management Plan reviews.</p> <p>IN SCOPE</p> <p>Mayor Reese has since advised that Site Visits for the new areas will not be needed. If the hearing panel wish to see the new areas, they will do so in their own time.</p> <p>Provide GIS viewer shots of the new sites.</p>
NT 2050	Wants Site visits for the new areas	<p>This is an urban design issue and is about how development occurs, rather than where and when. The form of future development, in terms of building design will be addressed through Councils Plan Changes and Resource Management Plan reviews.</p> <p>The draft FDS promotes the development of neighbourhood plans for priority areas within the city. This can detail at a more granular level what improvements are needed to support intensification, including improved open spaces and walking and cycling connections. These more detailed plans will provide a framework for more Council investment.</p> <p>OUT OF SCOPE</p>
Cllr Bryant	Need for employment land close to communities. Employment will change over next 30 years, have we taken that into account?	<p>Sense Partners undertook business land forecasting in 2021 for Nelson and Tasman. https://www.tasman.govt.nz/my-council/key-documents/more/urban-development-reports/capacity-assessments/</p> <p>The draft FDS promotes a centres-based strategy that encourages the most intensive employment activities (offices) to locate within intensifying centres. This approach is</p>

		<p>consistent with expected employment trends in Nelson that will see a further decline in industry and manufacturing and increased demand for commercial activity.</p> <p>Industrial activities are significant employment generators but have different functional needs. They are land expansive, need good access to the freight network and need to manage effects on sensitive land uses.</p> <p>There is sufficient land supply for business (industrial and commercial) to meet demand, however, the FDS identifies additional opportunities to provide local employment opportunities in the Tasman towns and respond to local feedback from the market, which are all located within the existing urban area and generally adjoining existing business areas.</p> <p>IN SCOPE</p>
Ina Kara-France	Maori economic development strategy for the area? What would that look like? What does our future look like in terms of workforce, technology etc?	<p>Nelson and Tasman Councils have worked collaboratively with iwi groups and Government agencies to develop the Te Taihū Strategy. This sets a range of actions for Maori economic development that the Councils can support.</p> <p>https://www.tetaihu.nz/</p>
Cllr McGurk	Port Tarakohe – what is the thinking around the TEP including this business area? Reverse sensitivities considered?	Port Tarakohe Sites have not made it in the draft FDS due to iwi cultural heritage significance.
	Site T-112 is this a suitable site for housing? What does MCA say?	<p>This site has been assessed in the draft FDS for housing (prior to public consultation), site T-112. It scored highly against the multi criteria assessment as the 6th highest ranked site</p> <p>IN SCOPE</p>
	Coastal erosion – recent info on sea level rise – some advice on how we approach that, have we contemplated it?	<p>See above question.</p> <p>IN SCOPE</p>
Ali Howard	Work on greenhouse gases and why not included in draft FDS? What is possible with this FDS in this respect?	<p>Refer to the additional VKT analysis and GHG emissions model undertaken by Tasman District Council in the staff deliberations report (theme 5).</p> <p>IN SCOPE</p>
Peter O	We hadn't considered partitioning, tiny houses not considered enough.	Draft FDS makes reference to partitioning as a form of intensification. Page 38 and 39 technical report (captured as suggested through community engagement on FDS

Mayor Reese/Cllr McGurk		Oct 2021). Tiny homes are a new name for something that had been around for years in a different guise. Consents may be required because they have environmental effects like any other dwelling, but tiny homes have been consented and built.
Mayor Reese	Repurposing of car yards in Nelson? What does our future economy look like?	<p>These car yards are currently zoned industrial under the Nelson Resource Management Plan. The FDS indicates that the area would be Mixed Use in the future, with provision for commercial at ground floor with residential above. This reflects the high accessibility of these sites close to the City Centre and the need to ensure land use used efficiently.</p> <p>Future of the economy is addressed in the Sense Partners report referenced above, together with the commentary.</p> <p>See page 82 technical report for why this site was not included in the draft FDS (could bring this site back in if need capacity but it is HPL - full block of LUC 1, scored 0). Resource scientist is also unsure of how we could mitigate flood hazard without impacting neighbouring properties, would need to reduce the site.</p> <p>IN SCOPE</p>
Joe Roberts	T-100 – advice from officers on this?	<p>See Tasman's Housing and Business Capacity Assessment 2021 https://www.tasman.govt.nz/my-council/key-documents/more/urban-development-reports/capacity-assessments/</p> <p>Section 1.3; section 1.4; section 4; 4.4, 4.5, 4.5.5, section 5, and 5.13.</p> <p>TDC is looking to improve its growth model to account for seasonal accommodation demand this year. Some factors to consider are what proportion of seasonal workers are usual Tasman residents (and therefore included in population projections anyway); what proportion are RSE workers (for which employers are responsible for providing accommodation), and what is the remaining proportion which are temporary residents in Tasman for seasonal work (this is the number we need to estimate in terms of additional housing demand in the growth model). And we'll need to do that by town.</p> <p>The FDS takes the total demand figures from housing from the HBA, which includes demand for various forms of housing as noted above. Sufficient development</p>
Mayor Reese/Cllr Bryant/Cllr Maling	What type of accommodation do we need? Seasonal workers? Relocatable homes? Have we considered need for workers accommodation (eg Tapawera) and sites where it needs to be and opportunities provided thro relocatable homes? Employers taking care of accommodation (RSE)? Influences we need to take into account when considering capacity?	

		capacity is then indicated in different locations. The Resource Management Plan will need to ensure that different types of housing are enabled in these locations incl. housing for seasonal workers, retirement villages etc.
Cllr McGurk	Workforce working in the rural sector – Tapawera – quantify employment growth in those sectors?	Sense Partners Business Land Demand Forecasting Study (see above)
Gary Clark	T-125 - iwi significance	See page 81 technical report to FDS. IN SCOPE
Cllr McGurk	Proximity of jobs to new houses and associated GHG emissions	See comments above regarding the additional VKT analysis and GHG emissions model, undertaken by Tasman District Council. IN SCOPE
Joanna Hopkinson submission	Murchison – yield of FDS sites and what is the study that says the town won't grow after about 20 years?	The sites in the draft FDS would yield approximately 260 dwellings, this is based on theoretical yields from the size of the sites and typical lot sizes applied. The Plan Change to rezone the land will provide more analysis on this. There is not a study on the growth of Murchison, the data referred to at a webinar was the population projections which were undertaken by Dr Natalie Jackson for the Long Term Plan 2021-2031 and Housing and Business Assessment 2021. These are available on our website under “growth model”. These project population decline after approx. 20 yrs but new projections are commissioned every 2-3 years. The medium projection forecasts demand for approx. 60 dwellings in Murchison over the next 30 years. IN SCOPE
Mayor Reese	Expectation for Tier 1 and Tier 2 Authorities eg number of storeys?	Policy 3 of the NPSUD sets clear minimum heights and densities for Tier 1 cities. Many of these cities have released early engagement material for their upcoming NPSUD Plan Changes. Auckland Council for example are proposing no height limit in the City Centre zone, 72.5m in Metro Centre zones, 6-8 storeys in other centres, 6+ storeys in surrounding High Density Residential zones and three storeys generally in residential areas. For Tier 2 cities, Rotorua Lakes Council are considering enabling 8 storeys within the City Centre, 5-6 storeys in surrounding high density commercial and residential zones, and 3 storeys generally in residential areas. IN SCOPE

	Changes in typology of housing – Collingwood, Trafalgar St what were they in previous FDS and what are they now?	Comparison to be provided/appended.
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Questions that were emailed through from Crs’:

Additional Question from Cr McGurk:	<p>Many transport related comments have been included in submissions.</p> <p>A theme that has been coming through for me in a quite a number of submissions is the proximity of employment to greenfield sites or for areas for intensification. Submissions have highlighted support for areas with good access to existing transport infrastructure and public transport.</p> <p>Conversely, they express concerns that many of the proposed greenfield sites are too remote from employment, commercial centres and services and to provide connections would result in increasing emissions as well as an increasing capacity.</p> <p>Would it be possible to include the number of additional jobs required in addition to the number of dwellings that would be required in a particular growth area. I’m unsure if there is a simple formula or model we could use.</p> <p>I’m thinking about the impact of sites on our region’s transport infrastructure. It might be helpful for my thinking when we have to consider the number of people who have to travel to and from where they live to where they work.</p>	<p>To clarify the information requested.</p> <p>Employment travel patterns differ between areas, and not all people living locally will work locally. Providing good, high frequency PT connections between the outer areas of Wakefield, Brightwater and Mapua to Richmond and Nelson be important to encourage reduced car travel.</p> <p>Impacts on the transport network from growth will depend on where people are going for work, noting that this accounts for about half of daily household trips. Education, and other local trips account for the other half. Intensifying close to employment, schools, public transport etc provides the best opportunity for urban form to support reduced greenhouse emissions. Consistent with this, the accessibility analysis undertaken (see Part 7.3.1) has been the basis of the height and density plans developed for the draft FDS.</p>
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Additional Questions from CR Edgar		
Outcomes:	Outcomes - a lot of people disagreed with outcomes not because they didn't like the outcome, but because they didn't think, as it stood, that that FDS would deliver on them. This needs to be considered when reporting back.	Addressed in the deliberations and the analysis report. Recommend further explanation in the FDS about the role and purpose of the outcomes. In scope.
	A lot of people commented on the use of the term 'outcomes' as opposed to objectives - as it implies that they are outcomes of the strategy, whereas they are aspirations.	While 'Objectives' has a specific statutory meaning under the RMA for District and Regional Plans, there is potential to amend the 'outcomes' to 'objectives' and include further explanation in this section of the FDS to explain their role in document.
	Outcome 1 - some people confused as to what the term 'land use transport' means.	Outcome 1: Urban form supports reductions in greenhouse gas emissions by integrating land use and transport. There was a typo in the submission form, the 'and' was left out.
	Outcome 3 - a lot of people commented on the phrase "where people want to live" as it was seen to undermine some of our other objectives and implies that personal preference can override all other considerations.	This was intended to equate to the demand component in Policy 5 of the NPSUD. Potential to amend to "demand", or could be addressed through further explanation.
	Outcome 4 - a lot of people commented that we haven't led up with enough housing options such as tiny houses, communal living etc., and that we need to give more options and enable through our	The TRMP enables tiny homes (meets the definition of a dwelling). The TRMP also enables cooperative living (communal living) in Rural 1, Rural 2 and Rural Residential zones.

	planning more options. It was also raised whether papakainga is one word or two.	<p>The FDS provides zoned and serviced land for different housing types. It is not within the FDS scope to enable different types of houses, that is covered in the RMA plans.</p> <p>See answers to the same question in the tables above for Nelson.</p> <p>Papakainga is one word.</p> <p>Required by NPS-UD 3.13(1)(a)(ii) as defined by 3.2:</p> <p>3.13 Purpose and content of FDS</p> <p>(1) The purpose of an FDS is:</p> <p>(a) to promote long-term strategic planning by setting out how a local authority intends to:</p> <p>(ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand;</p> <p>3.2 Sufficient development capacity for housing</p> <p>(1) Every tier 1, 2, and 3 local authority must provide at least sufficient development capacity in its region or district to meet expected demand for housing: in existing and new urban areas; and for both standalone dwellings and attached dwellings; and in the short term, medium term, and long term.</p> <p>Policy 5 of the NPSUD also requires the council to consider “relative demand for housing and business use in that location” when deciding what heights and densities to apply in a particular area. Location based demand and understanding where people want to live is therefore a relevant consideration. This has been assessed through the FDS with the use of land value data in the MCA.</p>
	Outcome 5 - a lot of people commented on the term "to meet demand" and that this is the wrong metric to be using and whether we should be managing demand and whether we should instead we should have a more council-led development approach versus a developer-led approach to developments (31820 & others)	<p>This part of the outcome is intended to ensure that we encourage heights and densities in locations that make efficient use of infrastructure, particularly transport infrastructure. Potential to refine/revise the wording if there are concerns it is confusing.</p>
	Outcome 6 - several people commented on the use of the phrase "to support growth" and sought clarification on this.	<p>Outcome 1 reads: Urban form supports reductions in GHG emissions by integrating land use transport.</p> <p>Outcome 1 is therefore already providing for mitigation.</p>
	Outcome 8 - some people questioned the use of 'adapt' only in relation to climate change and not mitigation.	

		<p>The FDS sets out to adapt to the likely future effects of climate change by providing for housing capacity requirement in areas that are not susceptible to hazards (such as sea level rise and fire risk areas etc).</p> <p>Land that is regarded as highly productive means that it is highly versatile and as such would support a large range of productive land uses.</p>
	<p>Outcome 10 - some people queried that the outcome only mentioned protecting HPL in relation to primary production, and not in relation to smaller food production/resiliency.</p> <p>Nelson Marlborough Health sought 5 additional outcomes (31512)</p>	<p>NMDHB requested additional outcomes for:</p> <ul style="list-style-type: none"> - Social housing - Inclusionary zoning - Access to green space - Housing affordability - Life-time design principles - Catering for reducing household sizes <p>Outcome 4 relating to housing choice and affordability captures NMDHBs comments on affordability. Social housing is provided by Kāinga Ora – the Council can provide social housing, however the FDS is not the appropriate place to consider this. The Council could develop a more specific housing/affordability strategy that assesses these options more fully, as other NZ cities do. This would also address the relative merits of inclusionary zoning.</p> <p>Access to green space is a key consideration and important to support intensification outcomes. This is reflected in Outcome 3, but this could be amended to more specifically reference quality open space.</p> <p>Life-time design principles or universal design is a matter relating to detailed building design and can be considered through future Plan Changes and Resource Management Plan reviews.</p>

	3 further outcomes suggested (31452)	<p>Three new outcomes requested:</p> <ol style="list-style-type: none"> 1. Organisational outcomes – a new regeneration agency. 2. Consistency with Council viability. 3. Low cost affordable housing. <p>Outcome 1 is a method rather than an objective. Addressed in comments above. Unclear what Outcome 2 is seeking. A matter for Council's LTP. The purpose of the FDS is to define the "how much" and "where" and is not a detailed funding plan. Affordable housing is addressed by Outcome 4.</p>
	The BRANZ research has been referenced in relation to our Outcomes - has this been reviewed?	See above already answered Out of Scope
Overarching Concerns/Further analysis/Assumptions/Considerations for final FDS		
	Does not give effect to/take into account the Zero Carbon Act (31539, 31708 & others).	Addressed in the deliberations and the analysis report (see section 7.3).

	<p>Not seen to adequately give effect to the NPS UD or GPS LT or NPS HPL or NZCPS (31539, 31540, 31807, 31304 & others)</p>	<p><u>NPS UD:</u> The NPSUD has been at the heart of the draft FDS. The outcomes of the draft FDS reflect the key policies of the NPSUD that are relevant to an FDS. See the analysis report for the statutory analysis relating to the key themes identified.</p> <p><u>GPS LT:</u> GPS 2021 has four strategic priorities, safety, better travel options, climate change and improving freight connections. Outcomes that give effect to the GPS LT include:</p> <p>Outcome 1: Urban form supports reductions in greenhouse gas emissions by integrating land use and transport.</p> <p>Outcome 3: New housing is focused in areas where people have good access to jobs, services and amenities by public and active transport, and in locations where people want to live.</p> <p>Outcome 6: New infrastructure is planned, funded and delivered to integrate with growth and existing infrastructure is used efficiently to support growth.</p> <p>This is further reflected in the criterion used to assess every potential future development site (specifically criterion 1, 2 and 7).</p> <p><u>Proposed NPS HPL:</u> The proposed NPS HPL is currently being reviewed by MPI and MfE, based on public submissions. The HPL criterion was discussed at a council workshop (although I think this was a TDC only workshop?), with councillors agreeing that a proposed NPS should not be taken into account for the FDS. See section 2.1.4, page 10, of the Draft technical document. The next review of the FDS will take into account the gazetted NPS HPL. We note however, that the proposed NPS HPL classifies HPL using Land Use Capability (LUC), which TDC have used (in combination with our Productive land classification system).</p>
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		<p><u>NZCPS:</u></p> <p>The only site in Tasman that is partly located within the Coastal Environment Area is T-163 (42 Keoghnan Road, Takaka). Mapping of the coastal environment in Tasman and Outstanding Natural Coastal Character in Nelson has been undertaken. Effects on the coastal environment have been considered through the MCA.</p>
	If the HBCA and LTP are used as the assumption for infrastructure and housing demand, how is there such a significant growth jump between those documents and the FDS assumptions (David Ayre).	<p>Refer to the Analysis report – see Section 3. The HBA and LTP assume medium growth. The draft FDS provides capacity for high growth to ensure the strategy is future proofed for all potential growth scenarios.</p>
	Doesn't adequately address climate change and that some locations of expansion are in sensitive areas e.g. coastal, rivers.	<p>Adapting to climate change has been a key consideration for the FDS, while acknowledging that the Councils are progressing other processes separately to determine the appropriate resource management response in high hazard areas e.g. The Wood. Up to date hazard data, that adjusts for climate change are included in the FDS viewer. This information has been used to assess sites using criterion 15.</p>
	Does not support/enable reduced GHG emissions - and even if electrified vehicles are taken into account, doesn't reduce congestion (31700).	<p>Refer to the VKTs analysis and GHG emissions model undertaken by Tasman District Council.</p>
	Options to address SLR and coastal hazards not addressed (31807)	<p>Council has considered natural hazards and sea level rise in its work programmes for a number of years, including decisions on resource and building consents, infrastructure planning, and to inform the FDS. In 2019 the Council launched its 'Coastal Management Project – Responding to Climate Change' which seeks to strengthen our existing work and is guided by best practice as set out in MfE's Coastal Hazards and Climate Change Guidance 2017. Between September – October 2021, the Council undertook community engagement on high level options for coastal management – under the four broad categories of accommodate, protect, avoid and retreat. The feedback highlighted the complexities of managed retreat for coastal settlements, and nationally councils are waiting for further guidance from central government on mechanisms to consider and implement retreat options over the longer term (where necessary). Long-term adaptive planning for sea level rise and coastal hazards will take several</p>

		years and community conversations will be ongoing. More information can be found at Coastal Management – responding to climate change Tasman District Council.
	How does the FDS actually support affordable housing or different types of housing other than just stand alone dwellings? (31407, 31512 & others)	There are many factors affecting the price of housing, including value of land, cost of building materials, banks finance lending policies, availability of skilled labour. The Councils alone cannot control the affordability of housing, but one thing we can do is to ensure that we have enough zoned and serviced land available for housing to meet demand, even in a high growth scenario. The FDS is the first step to look at growth. TDCs latest Plan Change for more housing land, which is at very early stages, is considering making provision of a range of section sizes mandatory, while retaining flexibility over housing typologies built. This could result in more smaller sections being provided and more affordable homes.
	How does the FDS support tiny houses (31560 & others)	The FDS ensures enough zoned and serviced land is provided, to meet housing demand. Provisions for Tiny homes (meets the definition of a dwelling) are enabled through the resource management plans. See TDC guidance note: https://www.tasman.govt.nz/document/serve/TRMP%20Summary%20Guide%20No.%2016%20-%20Provisions%20for%20Tiny%20Homes.pdf?DocID=31306
	How do we support small apartments/flats in rural communities to enable seniors to age in place (31605)	See comments to the same question in the table above. As above. No legal ability for the FDS to do this. The FDS ensures that enough zoned and serviced land is provided. Providing for small apartments/flats in the rural communities will be through other plans and strategies (such as RMA plans).
	Add high-level directives on housing affordability in final FDS (31807)	Addressed by the responses above.
	Add housing mix/examples (31594) that will support intensification, reduction in GHG emissions.	Noted, although the FDS is a high-level strategy.

	What does a 20-minute neighbourhood overlay look like and what impact would this have?	<p>This concept is consistent with the accessibility modelling that has been completed for the draft FDS, where the idea is to encourage more people to live close to where they live, work and play.</p> <p>The draft FDS encourages the Councils to prepare neighbourhood plans for existing parts of the city. These will be more detailed plans that inform what additional investments are needed to ensure that people can access what they need within a 20 minute walk. A neighbourhood level assessment is needed to consider this in detail. Examples of different types of neighbourhood plans (although not always called that – sometimes structure plans, spatial plans, community plans, area plans etc) can be found here.¹</p> <p>Already answered above.</p>
	Carrying capacity survey to be undertaken for each settlement (31547, 31636 & others)	
	Has employment analysis been undertaken to determine employment capacity/availability in settlements, in particular Mapua, Wakefield, Brightwater, Murchison, Tasman, Takaka. As part of that analysis, have we looked at a radius of employment hubs to see where housing should best be located (31593)	Only in terms of the HBA which compares business land demand projections (which are based on population and employment projections) vs business land capacity.
	How can the FDS support (as we can't prevent) single storey sprawl like in Richmond West? How can we be more supportive/enabling of intensification? (31363)	<p>The FDS can set out the range of methods available to the Councils to encourage more efficient use of land that could be implemented through other processes outside of the FDS.</p> <p>RMA plan rules can enable/incentivise higher densities, IAP to identify levers. Already in train with NCC & TDC.</p>
	Queries around validity of the uptake rate (31363). Why just one blanket uplift rate when previous	Addressed in the Analysis report and Capacity memo (see Section 4).

¹ https://www.tauranga.govt.nz/Portals/0/data/future/te_papa/files/te-papa-spatial-plan-2020-2050.pdf
<https://www.westernbay.govt.nz/repository/libraries/id:25p4fe6mo17q9stw0v5w/hierarchy/community-plans/community-plans/VBCP%20280120.pdf>

	FDS had multiple? Inconsistency between HBCA and FDS	
	Property Economics analysis for Kainga Ora - does this change any of our calculations (31807)	No. Addressed in the Analysis report and Capacity memo (see Section 4). Meetings held with Kainga Ora's consultants and all issues closed out See answers to the same question in the table above.
	Discussion of intensified options being cheaper or more expensive (31776)	
	Does the FDS need to acknowledge retirement villages as a form of intensification?	Retirement villages are an important form of housing, particularly given the aging population in Nelson and Tasman. Outcome 4 reflects this by promoting a range of housing types. The heights and densities identified in the urban area provide significant capacity for retirement villages, which are generally a more intensive use of land and require good access to healthcare, and services. The key way in which the Councils can support this form of housing is by implementing the heights and densities in the FDS through their Resource Management Plans. The approach is not the same as the 2019 FDS.
	The outcomes seem to be very different to 2019 FDS yet approach seems to be very much the same to achieve different outcomes (Business as Usual) (31371, 31407 & others)	Firstly, the level of growth we are catering for is significantly more than the 2019 FDS. 24,000 dwellings in 2019 vs 29,000 dwellings in 2022. This has meant we have had to find room for 5,000 more dwellings than 2019. Most of this growth has been accommodated through intensification in the urban area, with significantly greater heights and densities enabled. Several greenfield sites have been removed from 2019 that are remote from existing towns (e.g. Upper and Lower Moutere) and a limited number of new sites have been added. Some new sites in Wakefield, that are currently being reviewed against submissions.
	Why were the community values from the 2019 FDS not transferred (31439)	The principles of the 2019 FDS were considered in developing the draft FDS outcomes. More up to date information was used from recent LTP and Plan

		Review consultations, as well as discussions with iwi and early community feedback were used to develop the draft FDS outcomes. More capacity is provided in Tapawera than the demand suggests in the HBA.
	Tapawera growth under-estimated (31416)	Noted, the GIS viewer map shows present and future public transport. Although it should be noted that future public transport is continuously being updated. Potential to include a separated public transport map in the infrastructure section of the draft FDS and additional supporting text.
	Need to be more explicit about Public Transport changes and map these (31512 & others)	Noted – for next HBA. Principal Economics has undertaken a review of the Nelson Tasman HBA and found the methodology sound and well aligned with statutory requirements.
	Independent review HBCA identified that it needed to consider planning impacts on urban environment and effects of climate change (31540).	This report from Market Economics was commissioned prior to the draft FDS. It was context setting, and highlighted the importance of ensuring that the FDS provides for a range of housing choices. It highlighted the current community's preferences but did not tell us about how those preferences may change in the future. There are other relevant factors to consider other than preferences, including the need to support intensification outcomes to encourage a reduction in greenhouse gas emissions. In this respect, the report was one input of many to the draft FDS. Related to response to the below question.
	Reliance of FDS on demand preferences survey (31540)	This report by Sense Partners was commissioned by the Councils prior to the draft FDS. It did not inform the methodology that was used to develop the draft FDS and it is not referenced in the Technical report. The methodology used for determining the FDS growth areas within the combined urban environment was as follows: <ul style="list-style-type: none"> - Determine the growth numbers (what we need to cater for) - Develop spatial scenarios, of which 'intensification only' is one - Test capacity of scenarios and evaluate - Within the preferred scenario include well scoring sites – being those within the urban area.
	"Fatally-flawed assumption" that more greenfield supply will encourage intensification of existing urban areas (31540) see also (31807)	

		<p>- Only add greenfield sites where they are needed to meet the capacity target. Include the best scoring greenfield sites closest to the urban area.</p> <p>On this basis, delivering growth through intensification was the starting point, not greenfield. The staging plan will address how greenfield areas will be rolled out.</p> <p>The last FDS was prepared under the NPS Urban Development Capacity which required sequencing and timing of sites to be explicit in the FDS. The current draft FDS is prepared under the latest NPS on Urban Development (2020) which does not require FDSs to do this. This is due to the shift in Government policy (NPS UD) that has occurred. Local authorities are now encouraged to be responsive to the market, particularly in relation to proposals that would supply significant development capacity, even if the capacity is out of sequence.</p> <p>While the last FDS specified sequencing and timing, it was quickly out of date.</p> <p>Reality is sequencing will come through servicing (the infrastructure strategy & LTP and plan (deferred zoning)).</p> <p>Refer to the Analysis report for further details (see section 14).</p>
	Need some sequencing/implementation outline/timing of developments (31807, 31444, 31655)	<p>Unfortunately, the submitter has not referred to the actual sites, but in the ranked spreadsheet tab for the MCA, there are three sites in positions 1-3. These are T-115, T-177 and T-116 and represent their ranking before the 'no go' criteria were applied. Of these three sites, only one was progressed into the draft FDS, the others excluded since they are highly productive land. Site T-115 scored very highly (Berryfields Crossing) and was included since the land is already zoned for mixed business uses and is either developed or zoned all around it, therefore its productive value has already been lost.</p> <p>The submission talks about financial risks to the Councils. This issue is considered in the deliberations report.</p> <p>IN SCOPE</p>
	Areas that scored poorly in the MCA yet were still considered for MCA and areas that had incorrect scoring e.g land productivity quality of Richmond West (31388)	<p>The demand measure in the MCA is a value calculated from the property values in the area and is not one that is for staff to change. Any change to this value on its own will make it inconsistent with the methodology used for the rest of the urban area.</p>
	Need section in final FDS identifying how risks will be managed (31452)	
	Why is Saxton growth assumption identified as low (31547)	

		IN SCOPE	
	What consideration of education facilities has been included and what engagement with MoE (31444)	<p>The project team has held FDS stakeholder workshops to which the Ministry of Education was invited on 23rd Sept 2021 and 22nd March and Jacqui Deans of TDC attended a meeting with the Ministry of Education at their request on 6th Oct 2021 in Nelson.</p> <p>MoE advised, as they have for similar projects across NZ, that they plan for schools in response to growth. They will need to be a key stakeholder involved in the development of the FDS implementation plan.</p> <p>We could contact them. But initial discussions with KO said they were only interested in this for main centres and councils don't have the powers. KO reluctant to use the powers they have been given.</p> <p>See the response to this question in the table above.</p>	
	Consideration of an Urban Regeneration Agency (Eke Panuku) - what would be process to consider this? (31450, 31457, 31430 & others)		
	How were MCA criteria chosen? Should have Zero Carbon (or supporting that journey) been one of them? (31636)	<p>This is detailed in section 2.2.1 (page 10) of the Draft Technical document.</p> <p>Carbon reductions are reflected in the accessibility and public transport criteria, which were heavily weighted.</p>	
	Waka Kotahi considers 'safe' Active Transport and Public Transport should have been part of MCA (31655)	<p>When assessing each potential future development site under criterion seven, our Transport Manager and Senior Infrastructure Planning Advisor took into consideration any transport infrastructure upgrades that would be required to ensure safe active and public transport.</p> <p>Accessibility by public and active transport to the draft FDS sites (criterion 1) was assessed with the knowledge of all such proposals that the Councils have in place (i.e the future picture). Inevitably some of these plans are at the early stage and</p>	

		the Councils look forward to working closely with Waka Kotahi on ensuring these plans are deemed safe.
	Can development areas be deferred "subject to" DAPP, structure plans, inundation work etc.	Note MCA hazards criteria, also clear message in FDS that some sites will fall away when detailed assessments are done. This is a strategic plan and there is flexibility for it to change, particularly if the draft FDS is very explicit about it. 2019 FDS adopted the same approach. For Tasman, low-lying coastal areas were avoided so there is no need to have caveats such as subject to DAPP
	Please clarify growth assumptions to justify Murchison development and commercial areas - was previously on a zero growth assumption for TDC LTP (31700, 31761 & others)	31700 Incorrect submission number, think it is 31754 (answered above). The Tasman HBA 2021 sets out population projections and housing demand under a medium growth scenario, reflected in the FDS. These were also used for the LTP 2021. The FDS has considered, in addition a high growth scenario. For Murchison it projects demand for approx 60 dwellings over the next 30 years under a medium growth scenario. The FDS includes sites with capacity for 260 dwellings
	What is the process for inclusionary zoning (31724, 31609 & others). Is this being considered as part of RMA reforms?	See the answers to this question in the table above.
	Te Atiawa recommend using NERO (net enduring restorative outcomes) as a consequence of all decisions/changes (31805)	Too detailed for FDS. This will be applied through next level – plan changes etc, via te mana o te wai – currently, and new te mana o te taiao in NBEA.
	Any impacts on RNZ guyed aerial mast in Saxton Field from proposals? (31808) Do we need an NZ EMR regulation overlay or other mechanism to mitigate this risk to structures/building structures (31808)	RNZ legally required to comply with NZ EMR regulation NZS 2772.1:1999 same standards apply to the sports fields as housing.
	Is there sufficient commercial/business zoning in Stoke (31098)	The work done for the HBA looking at demand for business land did not look at the geographical spread of demand outside the Nelson/Tasman split. The model

		showed that there is sufficient business land overall but not specifically whether Stoke had enough.
Amenity and character	Do we need to consider a heritage zone, have a structure plan or consider impacts to historic areas e.g. Brougham, Bronte and Trafalgar St (behind Cathedral)? (31277) N19, N20, N21 (31737)	This matter is currently being considered as part of the Nelson Housing Plan Change. Requires input from a heritage expert and a detailed evaluation of sites. The area behind the Cathedral has been previously reviewed as part of the Nelson Plan and the expert advised that the area would not qualify as a heritage area.
	How do we ensure sufficient parks, playgrounds, attractive streets, tree-lined streets, amenity etc., alongside infill and intensified areas in particular (31371).	Neighbourhood plans, IAP, reserves strategy, plan rules around RFCs etc, good urban design requirements.
	What budget, if any, have we allocated for more outdoor areas to support intensified areas (31700)	<p>We collect RFC's to purchase additional reserve land (and fund community facilities).</p> <p>Most of the FDS areas are greenfield sites so when a development application is lodged we consider the number of lots, size, the LOS in the surrounding areas and acquire (purchase) reserve land if there is an identified deficit in the LOS OR if there are particular values of significance that we want to provide for or protect such as public access to and along the coast or linkages between reserve areas, significant indigenous veg/trees etc.</p> <p>We try to take into account future intensification BUT it is very hard because we cannot predict what future intensification will occur and we only receive RFC's relative to the current development.</p> <p>This issue has arisen in the RWDA SHA's where we acquired large(ish) reserves for the consented level of development and now the consent holders are applying to further intensify the existing consented development, often around the reserve areas ... but it is very difficult to acquire more reserve land to address the intensification once the area has been subdivided already ...</p>

		<p>In Richmond the reserves team is currently looking to acquire more land for reserves (or reuse Council owned land). In addition, please see intensification action plan 2020 which sets out plans for 'greenways' which are budgeted for in our LTP.</p> <p>In Nelson, the development contributions policy has changed to fund the improvement of existing reserves to allow their use by a larger number of people. This recognises that there is unlikely to be the opportunity to develop more land for reserves in the intensification areas without removing existing housing which would be counter to the objective of the NPS UD of providing for more capacity in these areas.</p>
	How are we balancing intensification and amenity (31593 & others)	<p>Richmond already has reserves and school playing fields that can be used by the community. In addition, in the Richmond intensification area the council is currently trialing change to the streets, to reduce traffic speeds, increase planting and ultimately seating, in order to improve amenity. This was a recommendation of our 2020 Intensification Action Plan.</p> <p>In Nelson, the development contributions policy has changed to fund the improvement of existing reserves to allow their use by a larger number of people. In addition, most of the intensification areas have reserves, parks, schools and playgrounds within easy walking distance.</p>
	Has the impact of increasing heights on amenity been considered especially The Brook and Tahunanui (31452, 31363)	<p>The NPSUD is directing Councils to provide for more growth and intensification within the urban area, consistent with the idea of a well-functioning urban environment. Policy 6 is particularly relevant, and recognises that "the planned urban built form... may involve significant changes to an area, and those changes may detract from amenity values appreciated by some people but improve amenity values by other people..." The policy also expressly recognises the benefits of urban development that are consistent with a well-functioning urban environment.</p> <p>In a context of change, the Council can through its Resource Management Plans require quality building design to ensure that what is built contributes positively</p>

		to neighbourhoods. Neighbourhood plans will also be important to determine what is needed locally to improve amenity.
	Have we considered amenity/mental health impacts of intensification (e.g shading, lack of access to green areas etc) (31543)	In response to concerns from the airport regarding reverse sensitivity, it is proposed to remove some of the area in Tahunanui previously shown for intensification. This will not have any effect on the overall capacity as this area is subject to sea level rise concerns as such the potential capacity has not been included in the totals.
	Previous intensification of Tahunanui in the 1970s and 80s has led to some very poor quality, poor amenity infill/intensification. How will current FDS lead to better outcomes esp 6 storey buildings? (31363, 31781 & others)	See discussion above.
	Can there be staggered heights (31821)	See discussion above. The Resource Management Plans will be critical to ensuring quality design is achieved.
		Yes, but it is unclear what the submitter is intending. The draft FDS does provide for staggered heights.
		If the submitter is seeking more granular height transitions, say between individual sites, this is a matter of detail and is best addressed through the Councils Resource Management Plan processes.
Natural environment	T163 - impact on Onahau estuary/wetland and esplanade reserve - outstanding natural area (31451, 31453, 31513 & others)	Already answered above.
	Do we have a conservation/wetland type of classification (31325)	NPS-Freshwater prohibits removal of any natural wetland. Doesn't have to be mapped
	Do we need to consider wildlife corridors (31625) % coverage of vegetation (31560)	Matters of detail, FDS can influence these. Plan changes will/ can
	Need greenbelt zones (31700)	Answered above

			This is in relation to a consented development, out of scope
	More houses e.g. near Baigents Bush, Snowdon's Bush = more cats = more negative impact on wildlife (31764 & others)		
Infrastructure	Concerns raised about existing infrastructure not being fit for purpose for intensification levels sought.	Yes, will require upgrades in most cases to enable intensification. This has been taken into consideration and reflected in the MCA scores for each site. Not all intensification will happen at once – more detailed infrastructure planning required as a next step but draft FDS shows key infrastructure corridors and upgrades required.	
	Do we need to consider serviceability of sites e.g. water availability in Tasman - if it can't be serviced do we need to acknowledge in any way e.g. rainwater tanks (31211).	Already considered	
	Bell Is WWTP capacity (31807) and who carries costs (31452)	Both TDC and NCC carry the cost for upgrades. Extensive answer above. See section 5.2.4.2 of the Draft Technical Document "They [NRSBU] noted that with infrastructure renewals currently underway, Bell Island WWTP has capacity to accommodate projected growth up until 2025 and that new infrastructure to the wastewater treatment plant is currently being explored"	
	Lack of evidence of integration of infrastructure planning (31807, 31655)	The draft FDS was put together with the full involvement of both external stakeholders and council infrastructure staff. See the trunk infrastructure maps in the draft FDS, MCA analysis.	
	Is infrastructure to support intensified development cheaper over the life of the asset (31564)	This shows the strategic picture of what bulk infrastructure is required to support the level of development shown. The implementation plan will work out how this will be staged. It depends on the infrastructure, size, cost etc and the number of households that that benefit from it.	

	Supporting infrastructure not well defined e.g Active and Public Transport (31444).	Answered above
	Concern about infrastructure and SLR - do we need to wait for DAPP processes to be completed? (31636, 31540 & others)	As stated in the FDS document, the FDS areas subject to sea level rise have not had their housing capacity included in the overall total. Instead, they are included but with the note that they are subject to the DAPP process.
	Update on Hope Bypass, timing if any, and impact if any on proposed development areas (31655)	The impact of the hope bypass will be considered through a plan change and consenting (if it ever happens). It has a designation which is still live. The FDS has planned around this alignment in case it happens
	Richmond's current development is a great example of unplanned development without adequate infrastructure, particularly for active transport or public transport (31533). How are any of the proposed developments going to be different?	Council have been working with Waka Kotahi to develop a plan for current and future transport needs in Richmond (Richmond Transport Programme Business Case). Other plans will fund infrastructure supporting FDS areas (such as the Long Term Plans and Regional Land Transport Plans). Structure planning of new greenfield areas will be a critical tool to ensure that development is planning before it occurs. TDC is already doing this through its structure planning for Richmond South.
	Is there a mechanism to support rurally-located adults without public transport in their area being able to use school buses? (31744)	The school buses are run by the Ministry of Education, not by Council. We have had conversations with Ministry of Education about these policies and the likelihood of change, but they are unlikely to change their policy.
Natural Hazards/ Hazards	Developments on fault lines & tsunami zones don't demonstrate resilience e.g. T195 and T181 St Arnaud (31439).	The Wairau/Alpine Fault is located approximately 350 metres southeast of T195. Waimea fault passes through T181 but it is considered suitable for rural residential density. Larger lot sizes allows buildings to avoid the fault line. Under the current TRMP, buildings need to have a 10m setback from the fault line. Geotech investigations would be needed and any subdivision would still require building site certification from an engineer/geotech regardless of the fault being present.

		<p>Since 2019, the Council has been undertaking our “Coastal Management Project” which aims to enable our Tasman Bay / Te Tai o Aore and Golden Bay/Mohua communities to work towards long-term adaptive planning for sea level rise and coastal hazards. It is noted that tsunami is out of scope of this project. This is because given the very low probability of occurrence of significant tsunami in our district, the Council does not address tsunami hazard in our resource management plans (which is the same for NCC and other councils). Instead, the Council focuses on providing education and information for evacuation through our civil defence functions.</p> <p>Already answered above</p>	<p>Since 2019, the Council has been undertaking our “Coastal Management Project” which aims to enable our Tasman Bay / Te Tai o Aore and Golden Bay/Mohua communities to work towards long-term adaptive planning for sea level rise and coastal hazards. It is noted that tsunami is out of scope of this project. This is because given the very low probability of occurrence of significant tsunami in our district, the Council does not address tsunami hazard in our resource management plans (which is the same for NCC and other councils). Instead, the Council focuses on providing education and information for evacuation through our civil defence functions.</p> <p>Already answered above</p>
	Continued development of low-lying coastal areas (and potential need to relocate people). Is there enough rezoned land to allow for relocation/managed retreat - in particular in Motueka (31493, 31098 & others). Do we need a climate change adaptation strategy for managed retreat for Motueka (31526 & others)		
	N32 Orchard Flats in a flood zone (31256).		The Orchard flats area is on the hill above the Maitai Valley floor and not subject to flooding.
	Kaka Valley/Maitai in an inundation zone (31156)		For this site it has been considered a feasibility issue that will be dealt with through appropriate engineering design. From a feasibility point of view, the plan change request indicates that development of the area is feasible as if it wasn't the plan change request would not have occurred.
	Mapua Coastal erosion and inundation (31304)		MCA addresses this by assessing each site individually. This information is on our webpage and in the technical report
	Development allowed on/near former landfill site at Neal Park - risks of methane leaks (31439, 31636 & others)		The area on top of the old Atawhai landfill comprises some housing and reserves as well as the Marae. Careful consideration will need to be given to any further development of this area as part of any Plan Change process.
	Slope instability, liquefaction and flooding assessments not done for Tasman sites (31512)		The Multi Criteria Assessment included inundation and river flood hazard as one of its key criteria. Stormwater solutions were considered at a high level for each site to see whether mitigation is feasible.

		While there is variation in the type of information available for flood hazards, slope instability and seismic liquefaction across the Tasman District, each proposed FDS site has been assessed for its exposure to natural hazards by Council's resource scientists and scored accordingly in the Multi Criteria Assessment analysis.
	How was Tahunanui slump zone not automatically excluded under natural hazards criteria (31651, 31698, 31763 & others) refer also BECA 2020 report re. unsuitability.	Responses outlined in the tables above.
	Mapua too low lying for any further development (31636)	The areas in Mapua identified for intensification from rural residential to residential avoid low lying land subject to coastal hazards.
	T139 Takaka - flood prone - should be rezoned wildlife reserve (31189)	T139 is at a higher elevation and therefore has a lower risk of inundation. The lower lying areas have been left out on purpose. Future development will need to consider and manage flood risk in this area and mitigate potential downstream effects. There is an LTP stormwater upgrade in Commercial St in the LTP 2021
	T143 Takaka - flood prone (31309)	T-143 - Parts of this area could be raised (to mitigate the flood hazard) in a way that avoids effects on other properties. For residential development in the subject area it is unlikely that the entire area can be raised. Whilst unlikely to be high velocity flow, the floodwaters are not static (i.e. ponded) and do flow. Any raising of the land would still have to allow for this. The supermarket provides a useful example. As part of their resource consent application they included an assessment of the effects on flood flows and depths. The subsequent design included ensuring there was sufficient flow capacity around the building so as to avoid adverse effects on neighbouring properties.

Highly Productive Land	Braeburn Rd area is productive soils (31134). How is highly productive land classified - does this need to be extended? (31403)	For land to be classified as highly productive it will need to be versatile enough to sustain intensive cropping and horticulture. There are two classification systems that have been used to assess this site. The Land Use Classification (LUC) and the Productive Land Classification (PLC). LUC looks at rock type, soil, slope angle, erosion type and severity and vegetation cover. Land classified as LUC 1, 2 and 3 is regarded as highly productive. T-136 I likely to be 5 or 6. The PLC looks at altitude, length of growing season, heat in summer, rainfall, wind, slope, aspect, fertility, water holding capacity, rooting depth, erosion, structure/texture and drainage & permeability. The PLC classifies T136 - as class E, which means that the most intense land use would be intensive pastoral use. The land is not suited to cropping and horticulture.
	Remaining areas of Waimea Basin should be left for food production (31404). Remove HPL in Waimea Plains T038 T120 & T121 (31418).	Presuming you mean Waimea Plains? The Waimea Plains are classified as LUC 1-3 and PLC A-B, which means that they are regarded as highly productive. The land in Richmond South (T38, T120, T121) in the draft FDS also formed part of the adopted 2019 FDS. The Councils decided that it was needed to help meet growth demands and while comprising some highly productive land, if it was developed to densities that make efficient use of the land, it was favoured. Its position in close proximity to the town centre is an obvious strength.
	Scoring of Richmond West land in MCA inaccurate (31388)	Answered above
	Unused land is different to unproductive land (31325)	Unused land is not the same as unproductive land. The physical characteristics of the land together with climate attribute determine how versatile and as such productive the land is. Land could be deemed as highly productive but the current owner could decide to simply not use it at all.

Existing Rules/Impacts/Incentives	Does the Nelson city centre zoning allow for developments such as housing over carparks e.g. Buxton Square (refer Nelson Mail article)	Yes, although there are restrictions on the type of uses that areas within the parking squares relating to gifting and acquisition to land. For example, if the land has been acquired for the purposes of car parking, there would need to be additional legal work done to determine what other types of activities could occur.
	What is the impact on CJ Industries shingle extraction on Motueka River Vly development (31252) and conversely impact on aggregate supplies (31376) and the need to consider quarrying land as highly productive	The CJ Industries RC application is separate to the FDS. A current application exists and a hearing is scheduled. This is for gravel extraction from the berm of the Motueka River and on the landward side at 134 Peach Island Road. This is on the opposite side of the river to site T-17. Time periods for the extraction have not yet been determined. The Resource consent officer is aware of the submission on the FDS. The issue of the quarrying land being highly productive is outside of the FDS
	Impacts of FDS on 96a Ellis Street and Schwass Lane (31292)	This new site has been assessed and while it scored relatively well, it is not needed to meet business demand and already have other options. In light industrial use currently, suggest TEP looks at rezoning for commercial
	Do we need to zone for schools, recreation and medical facilities?	The NPS UD requires us to spatially show the location of additional infrastructure to support growth. This is defined as including social infrastructure such as school and healthcare facilities. We have said in the draft FDS that additional infrastructure would be planned for and provided in response to growth (consistent with the advice we had from infrastructure providers including MoE, Network Tasman, DHB, Transport, NRSBU etc). In terms of open space this would be addressed through the structure planning (greenfield sites) and neighbourhood planning (brownfield sites) stages prior to rezoning.
	What rules mitigate shading, allow for inner city greenspace etc and how do we allow for this/require this in the FDS?	Not a FDS matter these are RMA plan rule performance standard matters
	Can we relax rules on multi-purpose dwellings and offer incentives for intensification (31409)	Yes but not through the FDS
	T01 Shannee Hills and T03 Jeffries Rd would fragment rural land (31414)	T-03 is not classified as productive land as it is too steep.

		T-01 is classified as productive along the valley floor but not on the steeper sides. As such T-01 would have been given a lower score for productivity than T-03.
	Current rules don't allow partitioning? Is this correct? (31791)	The draft FDS recognises partitioning of dwellings as a form of intensification. Rules to more readily provide for this can be developed. Building Act requirements regarding fire rating are important factors. There has been very little uptake of partitioning in Tasman District to date. We have a building guide on our website explaining how this can be done. See answers to the same questions above.
	Consider introduction of rural-urban boundaries as per QLDC (31540).	There are several different options for getting the balance right for intensification and greenfield development. Rural-urban boundary is one, others are regulatory planning methods in the Resource Management Plans. These need to be considered in detail through the Councils' respective plan reviews.
	Consideration/more information about perimeter blocks as a type of intensification (31540)	Responded to this in the Nelson Tasman 2050 submission response.
	Building and RM rules make intensification too restrictive and hard (31564) - what do we need to change - can we make recommendations?	Both Councils are working on plan revisions to make intensification consenting more straight forward. Tasman's RMP currently enables intensification in Richmond and uptake has been promising.
	Are we allowed a tiered DC system to provide reductions/incentives and if so, would this support intensification/developments in the "right areas" (31407)	See answer above
	Have we assessed reverse sensitivity or land use in/compatibility as part of our new development area assessments? (31715) Or have we built in buffers?	See answer above

	Have we analysed/considered intensification incentives e.g. 31724 (refer Habitat for Humanity submission).	Yes see both Councils' intensification action plans
	Do we have any way to control developer covenants such as minimum house size (31724)	No.
	Are Noise Contours/Reverse sensitivity (N102, N034) incorporated as per Nelson Airport submission (31770)	Yes, Covered in the deliberations report.
	Is there an Airport Effects Advisory Overlay as per NAL submission (31770)	Yes. Officers recommend some areas are removed from the FDS in the vicinity of the Airport.
	Can end up with orphaned sections/sections too small to be economically viable to continue productively/reverse sensitivity can also impact on viability (31779)	Yes, sections can be and are amalgamated into larger properties, rural res properties demonstrate loss of productive land as well as residential development. Appropriate buffers to account for reverse sensitivity are considered when FDS sites are looked at for re-zoning, e.g Richmond south.
Private Plan Changes/ Re-zoning	Deliberations report needs commentary on the scope of what can be considered in relation to the number of Private Plan changes that have been mentioned throughout the submissions/hearings e.g. PC28, Harakeke etc.	Noted – RMA provides a pathway for anyone to seek a plan change, including re-zoning of land. There is no outright veto of this process. The RMA schedule 1 process for private plan changes has to run its course.
	Also need to comment on the submissions that asked for land to be rezoned and the scope/where this fits in the process.	FDS does not rezone the land – out of scope. This occurs via a Plan Change or Plan review
	I think there also needs to be commentary or a flow chart or something in the FDS to show the relationship between FDS, TRMP, PPC etc.	Flow chart already provided in FDS. See page 4 summary doc

	Need commentary on to what extent, any of the planning in the FDS obviates the need for a resource consent - a lot of people talk about "of right". Would height be "of right" but all other elements would still require a resource consent? Is there the potential that a 6 storey building could be developed and not require any other consent? Is daylight angle, shading etc., parts of any consent, and if height is allowed, would these aspects still need to be considered? (31296)	Any 'relevant FDS' is something which must be had regard to in deciding on a consent. This does not elevate the FDS to the level of the higher order documents (i.e. the NPS UD) which must be given effect to, but rather, it makes the FDS a relevant consideration to be taken into account. Noted. FDS doesn't obviate any planning requirements from plan changes to rezone and the rules that would then apply to consents.
Structure Plans	A number of structure plans were mentioned. Can we please know the status of each of these and where they stand in the hierarchy, what their current status is, and why the FDS was silent on them e.g. Tahunanui, Mapua, Port Tarakohe, and whether the FDS renders them redundant (refer also 8 March Joint Committee meeting - comments by Chris Pawson - 31540).	Noted. Structure plans have no legal weight unless codified or incorporated by reference into an RMA plan. You could take them into account when developing an FDS and vice versa a structure plan can consider FDS areas (more likely). They represent how areas may be developed. They do age very quickly. The Mapua one was used to inform re-zoning after it was produced and is now out of date as things change and assumptions 10 years ago are no longer valid. Port Tarakohe – strategic planning is underway as part of TEP development to produce a strategic/spatial plan for the area. The FDS has no bearing on them and each council would need to consider if they are still relevant and whether a new one or a refresh is needed.
	There was also a lot of comments about the need for structured development/structure plans e.g. Motueka South (31593 & others). Is this something we would do or could acknowledge needs to be done. Could areas be deferred subject to structure plans being in place? (31684 & others). Should they be done for each development area (31457)	Could possibly defer a zone until a structure plan is in place, but more likely we would do a structure plan as part of re-zoning (E.g Richmond South) Motueka South is essentially two developers (Wakatu and NRAIT). Rezoning includes things such as indicative reserves, walkways roads etc. it will depend on size of area being looked at. The implementation section of the draft FDS is clear that structure planning is required as part of rezoning greenfield land. It is a tool to inform the land use/zoning pattern and supporting infrastructure etc.
Additions/ Changes/	We need to be including mixed use development as part of new residential areas (31512)	Richmond – yes this was an error. Map amended, showed infill in CBD instead of mixed use.

Deletions		<p>There is potential for mixed use along key corridors. The maps in the draft FDS refer to “intensification” and provide flexibility to incorporate some mixed use activities in key locations through the Resource Management Plans.</p> <p>Residents suggested sites be assessed following early engagement and then more residents suggested more sites during submissions. There is nothing in the NPS UD that prevents this when preparing an FDS.</p> <p>All new or amended sites have been assessed using the same process as for the draft FDS.</p>
	<p>There have been a large number of requests for changes - additions/ deletions/ extensions etc to the development areas. I would anticipate that we need to address each of these. In particular, for additions, why these weren't included in the draft FDS, but a full MCA for each of them as well as commentary as to whether we should accept, or not, the proposed changes and degree of significance (I'm not advocating either way, just listing as submitted). I have included some "rezoning" requests below, as these are still relevant for discussion here. List is possibly not necessarily complete: see below</p>	
	<ul style="list-style-type: none"> 89 Abel Tasman Drive to be residential (31250) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> What happened to 1,000 house Mariri Hills proposal in 2019 FDS (31386) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Change T166 from Rural 3 to Rural Residential for higher yield (31388 & 31405). 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Add Falcon Ridge Estate, Higgins Rd (31435) 	All new or amended sites have been assessed using the same process as for the draft FDS.

	<ul style="list-style-type: none"> Extend T32 Pigeon Valley to include 405 & 433 Pigeon Valley Rd (31461) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Extend Pigeon Valley to include 172 Pigeon Valley Rd (31735) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Change T035 and T122 to mixed use (31512) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Remove T038, T120 & T121 (31418) (HPL) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Extend Nayland South - refer Kainga Ora submission (31807) 	Further work has been done with Kainga Ora and Property Economics on this. No further changes needed.
	<ul style="list-style-type: none"> T102 to include area to the West & North of Snowdon's Bush (to add buffer) (31438, 31662 & others) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Change Queen Street CBD to mixed use development (31569 & others) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Add land between T140 & T163 for residential (31642) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Additional commercial area Marsden/Montebello area (31659) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Add to Teapot Valley proposed Development area (31520) 	All new or amended sites have been assessed using the same process as for the draft FDS.

	<ul style="list-style-type: none"> Add 10-140 Seaton Valley Rd (31629) 	All new or amended sites have been assessed using the same process as for the draft FDS.	
	<ul style="list-style-type: none"> Additional land at St Arnaud (31638) 	All new or amended sites have been assessed using the same process as for the draft FDS.	
	<ul style="list-style-type: none"> Extend Raine land and have business park/commercial area (31547) 	All new or amended sites have been assessed using the same process as for the draft FDS.	
	<ul style="list-style-type: none"> Remove 42 Keoghnan Rd from T163 (31513) 	All new or amended sites have been assessed using the same process as for the draft FDS.	
	<ul style="list-style-type: none"> Extend development area of Baigents Bush Reserve (31620) 	All new or amended sites have been assessed using the same process as for the draft FDS.	
	<ul style="list-style-type: none"> Expand Hope/Richmond South (31548) 	All new or amended sites have been assessed using the same process as for the draft FDS.	
	<ul style="list-style-type: none"> Expand (address redacted) - (31551) 	All new or amended sites have been assessed using the same process as for the draft FDS.	
	<ul style="list-style-type: none"> Remove Teapot Valley T003 (31550 - land owner) 	All new or amended sites have been assessed using the same process as for the draft FDS.	
	<ul style="list-style-type: none"> Remove Pigeon Valley South Branch (31529) 	All new or amended sites have been assessed using the same process as for the draft FDS.	
	<ul style="list-style-type: none"> Change part of T112 to commercial (31614) 	All new or amended sites have been assessed using the same process as for the draft FDS.	

	<ul style="list-style-type: none"> Add Massey St site in St Arnaud for Papakainga (31552) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Refer 31702 to list of changes to Mapua (Rural Residential and Commercial areas) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	Port Tarakohe zoning (31714, 31826) - why wasn't this included in draft?	The submitter did not ask for it to be assessed as part of the draft FDS. There was no feedback provided for the first round of engagement. Through discussions that other council staff have had with the submitter, prior to the FDS, the two business sites now assessed following submissions were not presented. The actual submission does not ask for these sites to be assessed as part of the FDS, it took several e mails to obtain a site plan from the submitter. The proposal discussed with other staff was for the zoned industrial area to be rezoned as port and support service requirements for aquaculture
	<ul style="list-style-type: none"> Extend Industrial area at Marchwood Park (31760) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Remove T114 (31791) T114 has capacity for more development than allocated (31316) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Add Wensley Rd as area for intensification (31791) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Add Golden Hills Rd properties as rural residential (31791, 31804) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Land adjoining T017 to be rural residential and some medium density (31785) 	All new or amended sites have been assessed using the same process as for the draft FDS.

			All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Add land at 49 Stafford Drive as residential (31809) 		All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Add land at Pohara as future growth area (31813) 		All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Change land at cnr Appleby Straight (SH) and Blackbyre Rd to rural industrial (31814) 		All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Add Griffin family landholdings at Angelus Ave and Champion Rd (31819) 		All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> T125 in Mapua as a commercial hub (31595) 		All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> T17 could support higher capacity than indicated in FDS (31457) 		All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Suitability of 2ha at end of Beechnest Drive for residential development (31638) 		All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Does St Arnaud need commercial land? (31608) 		All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> Change T112 to high density housing (and add road) (31614) 		All new or amended sites have been assessed using the same process as for the draft FDS.

	<ul style="list-style-type: none"> • Include Burnside Rd as per 1995 Environment Court (31111) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> • Possible residential zoning opposite airport (31210) 	The submission number does not match with a submission dealing with the airport. A submission was received from the Nelson Airport and this issue is dealt with in the deliberations report.
	<ul style="list-style-type: none"> • Extend N112 and N111 (31547) 	Dealt with in the deliberations report.
	<ul style="list-style-type: none"> • Extend T102 to include 70a Waimea West Rd (31662) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> • T054 Teapot Valley to be extended to include 4 Teapot Valley Rd (31520) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> • Extend Richmond/Hope development areas to include their landholdings at Lansdowne & Ranzau Rds & Main Rd Hope adjacent to T035 (31548) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> • T107 to be zoned Rural Residential and some mid-density (31785) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> • 34ha at Pohara to be identified as a growth option (31813) 	All new or amended sites have been assessed using the same process as for the draft FDS.
	<ul style="list-style-type: none"> • 123 Halifax Street 	This area has been red flagged by Iwi so is recommended to not be added to the FDS to keep consistent with the process followed for all of the other sites.
	<ul style="list-style-type: none"> • Saxton Extension 	This area scores well in the MCA and is proposed to be added to the FDS. This is dealt with in more detail in the deliberations report.

	<ul style="list-style-type: none"> Orphanage West extension 	This area scores well in the MCA and is proposed to be added to the FDS. This is dealt with in more detail in the deliberations report.
	<ul style="list-style-type: none"> Port Nelson 	Port Nelson is identified as a strategic asset and as a result it is recommended that the area is not included in the FDS.
Errors/Maps/Clarifications	T181 incorrectly labelled (31204)	Only the street address was incorrect, the label and mapping is correct. The submitter is aware of this minor error.
	Unfinished sentences to be fixed (31359)	Will be address in the final FDS.
	MCA inconsistencies - column 15 - strategic constraints not listed and inconsistency with map 5a (31439).	As stated in the FDS document, the FDS areas subject to sea level rise have not had their housing capacity included in the overall total. Instead, they are included but with the note that they are subject to the DAPP process.
	Hira still identified as a growth area in FDS p. 14 (31540)	This section of the draft FDS details the range of spatial scenarios that were considered and clearly states that the ones with Hira included were not progressed.
	Submitter (31204) raised errors with maps.	The maps themselves were not incorrect as claimed by the submitter. The maps in the online GIS viewer showed the boundaries of each area. The maps in the FDS document showed the boundaries of the recommended building heights with the FDS area labels placed in the general area.
		The final FDS document will have the boundaries of the FDS areas included on maps.
	Draft FDS maps poorly labelled re. Tahuna - Tahuna itself in map labelled "Nelson South" and this map is referenced in section 8.1 "Nelson City Centre and surrounds" and Tahunanui is not mentioned in this text. Section 8.2 "Stoke, Tahunanui and surrounds" doesn't mention height changes proposed and refers to Fig 6 which doesn't have Tahunanui.	There were errors and mislabelling issues and in one of the four pieces of advertising it referenced Nelson City Centre and Nelson South rather than Tahunanui. However, the public notice and 3 of the 4 advertisements as well as the FDS document itself, reference Nelson which includes Tahunanui. The FDS is intended as a growth strategy for the whole of the Nelson and Tasman area so the advertising reflected that. Not every suburb was mentioned by name in the advertising material as this would not have been feasible while still being effective advertising.

	Use of language relating us to a Tier 1 area (31256)	The reference to Christchurch (a tier 1 city) in the Sense Partners report is related to providing a comparison on uptake rates for intensification. This is necessary if a comparison is done with other tier 2 areas, it would be difficult to gauge where things might head as far as intensification is concerned. Looking to the trends in an area more advanced than Nelson/Tasman necessitates looking at places that have already experienced that development type occurring.
	In final version can map colours be better differentiated especially figure 5a.	Will be address in the final FDS.
	Ensure all acronyms are clearly defined first.	Will be address in the final FDS.
	Concerns about lack of Tahunanui consultation (31363) in particular.	<p>We did three stories in Our Nelson, which is delivered to all households in Nelson, including Tahunanui:</p> <p>https://our.nelson.govt.nz/stories/future-development-strategy-consultation-goes-online/</p> <p>https://our.nelson.govt.nz/media-releases-2/future-development-strategy-feedback-breaks-ground-in-identifying-new-sites/</p> <p>https://our.nelson.govt.nz/media-releases-2/pressing-play-on-future-development-strategy-public-consultation/</p> <p>The suburb of Tahunanui was not specifically listed in advertising material. Nelson is a compact area compared to most local authority areas so the communication was aimed at everyone rather than tailored to each individual suburb. Every household in Tahunanui will have received a copy of three stories included in Our Nelson and delivered to all households.</p>
	To what extent should we be considering the latest IPCC report and SLR report? (31636, 31373)	Already covered in answers above.
	Is the 30 yr timeframe a legal requirement? (31322 & others)	Already covered in answers above.

	Webinars - attendees were told they were to be recorded but then weren't. Concerns also Q&A summaries were selective (31781 & David Ayre)	Attendees were told that the questions from the webinars would be summarised and included for the deliberations process. A recording of the material presented at the webinar was available on both council's websites.
	Why are recordings of hearings not to be released until after <u>all</u> hearings?	This is just down to the resources that the team has for doing this task. All team members were needed at the hearing or working on other tasks relating to the FDS if the deadlines were to be met. Recordings have now been released.
	Next steps: Need to update websites with deliberation venues, times (start & end), Zoom links, public access.	Noted. TDC website has been updated with deliberations dates. Further updates to be provided on website when Deliberations report/agenda made public and new timeframes are confirmed.
	Why are recordings of hearings not to be released until after <u>all</u> hearings?	Hearings over the four days went into a single recording. Had to wait until the end to separate these out and upload them.
		Recordings of hearings are now up on both websites (via a you tube link).