

Notice is given 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  
**Zoom conference link:** <https://us02web.zoom.us/j/89063880895?pwd=aVdlT2tyenJKU3hrK1ozMEIxckVPQT09>  
Meeting ID: 890 6388 0895  
Meeting Passcode: 485703

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## Deliberations

### Future Development Strategy Deliberations

## AGENDA

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#### MEMBERSHIP

<b>Chairperson</b>	Mayor R Reese	
<b>Deputy Chairperson</b>	Deputy Mayor S Bryant	
<b>Members</b>	Cr D Ogilvie	Deputy Mayor J Edgar
	Cr K Maling	Cr B McGurk
	Ina Kara-France	

(Quorum 2 members)

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# AGENDA

**1 OPENING, WELCOME, KARAKIA**

**2 APOLOGIES AND LEAVE OF ABSENCE**

**Recommendation**

**That apologies be accepted.**

**3 REPORTS**

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**4 HEARING OF SUBMISSIONS**

Nil

**5 CONFIDENTIAL SESSION**

Nil

**4 CLOSING KARAKIA**

### 3 REPORTS

#### 3.1 DELIBERATIONS HEARING - NELSON TASMAN FUTURE DEVELOPMENT STRATEGY 2022-2052

**Decision Required**

<b>Report To:</b>	Submissions Hearing
<b>Meeting Date:</b>	31 May 2022
<b>Report Author:</b>	Jacqui Deans, Urban Growth Co-ordinator Chris Pawson, Strategy and Environment Senior Analyst
<b>Report Number:</b>	RSH22-05-8

#### 1 Summary

1. This report summarises the key matters raised through the special consultative process for the Nelson Tasman Future Development Strategy 2022-2052. It seeks the Future Development Strategy (FDS) Subcommittee's direction on these matters to enable officers to prepare the final FDS and accompanying technical report. The Joint Committee of the Nelson City and Tasman District Councils was scheduled to adopt the FDS on 27 July 2022. This has since changed slightly. The intention is for the Joint Committee of the Nelson City and Tasman District Councils to consider adopting the policy decisions arising from the FDS on 27 July 2022 and for the same Joint Committee to either consider adoption of the FDS itself by the end of August, or delegate adoption to the FDS Subcommittee by the end of August.
2. The Nelson City and Tasman District Councils received 568 submissions throughout the FDS consultation period (14 March to 14 April 2022 inclusive), including five late submissions which were accepted by the FDS Subcommittee on the first day of the hearings. This report covers the main themes raised by submitters and outlines officers' response and recommendations. Officers have also considered the questions raised by the Subcommittee during the hearings process and these are either addressed in this report, and/or answered in an accompanying briefing note sent out under separate cover. The FDS Subcommittee may wish to raise other matters at the deliberations meeting.
3. The Statement of Proposal for the FDS comprised a core part (consolidated growth focused largely along State Highway 6 from Atawhai to Wakefield, but also including Māpua and Motueka and meeting the needs of Tasman rural towns) and a secondary part (creation of a new community near Tasman village and Lower Moutere (Braeburn Road), for consideration by the community).
4. The questionnaire which accompanied the Statement of Proposal asked the community a large number of questions. A number of key themes have emerged from the submissions. Each question has been analysed in detail in Attachment 3 to this report "Submissions summary report". This report to the FDS Subcommittee focuses on the key themes that have emerged from the submissions, which are:
  - 1.4.1 Theme 1 - Growth projections (page 14);

- 1.4.2 Theme 2 - Housing land capacity calculation and uptake rate for housing intensification (page 18);
- 1.4.3 Theme 3 - FDS outcomes (page 21);
- 1.4.4 Theme 4 - Multi criteria analysis framework (page 23);
- 1.4.5 Theme 5 - Greenhouse gas emissions reduction (page 29);
- 1.4.6 Theme 6 - Greenfield/brownfield housing capacity split (page 37);
- 1.4.7 Theme 7 - Proposal for a new community near Tasman village (page 42);
- 1.4.8 Theme 8 - Site specific matters (page 45);
- 1.4.9 Theme 9 - Implementation – infrastructure (page 52);
- 1.4.10 Theme 10- Staging of development (page 54);
- 1.4.11 Theme 11 - Building height – Nelson (page 55);
- 1.4.12 Theme 12 - Natural hazards – Tasman, the Wood and Tahunanui, Nelson (page 57);
- 1.4.13 Theme 13 - Strategic areas – Port Nelson and Nelson Airport (page 58); and
- 1.4.14 Theme 14 - New sites and amended sites proposed and sites proposed for exclusion through submissions (page 59).

#### **Proposed amendments to the draft FDS**

- 5. Following consideration of all the submissions, the completion of the hearings, and a workshop to brief the Subcommittee on the various technical documents, officers have considered a very wide range of proposals but have identified the following amendments that they now recommend should be incorporated in the final FDS:
  - 1.5.1 Replace the term “outcomes” with the term “objectives” in the final FDS document;
  - 1.5.2 adopt the core part of the proposal in the final FDS (consolidated growth focused largely along State Highway 6 from Atawhai to Wakefield, but also including Māpua and Motueka to meet the needs of Tasman rural towns);
  - 1.5.3 remove the secondary part of the proposal in the final FDS (creation of a new community near Tasman village and near Lower Moutere (Braeburn Road)). This comprises sites T-166, T-167, T-168, T-136. Also, to exclude new site T-202 at Lower Moutere (Hayden-Payne land, Tasman View Road, adjacent to site T-136);
  - 1.5.4 remove the Tahunanui core slump infill area from the pink and white coloured infill area on the FDS map;
  - 1.5.5 clarify in the FDS that The Wood and Tahunanui FDS areas are included in the FDS subject to the outcomes of the climate adaptation Dynamic Adaptive Pathway Plan (DAPP) process, underway currently and to use an overlay on the FDS maps illustrating this;
  - 1.5.6 The FDS should contain a set of principles to guide the staging in the FDS implementation Plan. The process for developing the implementation plan should include infrastructure providers.
  - 1.5.7 *NCC FDS sites*

- Port Nelson and Nelson airport: remove area N-102 and the part of N-034 inside the 55dBA airport noise contour in response to concerns from the Nelson Airport management regarding noise sensitivity and recognition of the strategic importance of the airport to the regions;
- expand both area N-011 (Saxton) and N-112 (Orphanage West) by adding two additional areas called N-115 (Saxton extension) and N-116 (Orphanage West extension). Leave the area N-011 as a single residential greenfield expansion area with any other land use to be considered as part of a plan change or resource consent application

#### 1.5.8 *Tasman District Council FDS sites*

- add site T-198 (Falcon Ridge winery, Higgins Road, Brightwater rural residential) and remove site T-54 (Teapot Valley, Brightwater rural residential);
- remove site T-41 (88 Valley Road, Wakefield, residential);
- change existing site T-28 typology (Pigeon Valley Road, Wakefield) to rural residential from standard residential and add adjoining site T-200 (Pigeon Valley Road, Wakefield, rural residential);
- add sites T-205 (14 Waiwhero Road, Motueka Valley, rural residential) and T-213 (318 Motueka Valley highway, rural residential) to existing adjacent FDS site T-17 (either side of Mytton Heights, Motueka);
- add site T-206 (Hickmott Place, Motueka, mixed use);
- add site T-217 (79 Main Road, Tapawera, residential);
- add site T-219 (3177 Korere Tophouse Road, St Arnaud, rural residential) to adjoin existing FDS site T-181 (3103 Korere Tophouse Road, St Arnaud, rural residential);
- change boundary of FDS site T-01 (Jeffries Road, Brightwater, residential) to include whole of a landowner's property (106 Jeffries Rd) but also to remove a small southern portion (75 Jeffries Road), as the landowner is not supportive;
- exclude site T-003 as landowner not supportive (Shanee Hills, Brightwater, residential);
- exclude site T-48 as landowner not supportive (Rototai Road, Tākaka, residential);
- reduce size of FDS site T-37 (Fairfax Street, Murchison, residential), as additional landowners not supportive;
- amend orientation of site T-145 (Page Road, Murchison, light industrial), as preferred by the landowners;
- reduce overall scale of site T-195, but to include a small parcel of land (Massey Street, St Arnaud, papakainga) due to revised proposals by the landowner;
- site T-05 (Wanderers Avenue, Brightwater, residential)– boundary extended to align with Growth Plan Change boundary following further evaluation and to allow for an esplanade reserve;
- site T-42 (Stafford Drive, Māpua, residential) – small extension to SW corner of site to align with and following further evaluation for the Growth Plan Change;

- site T-107 (Edward Street, Wakefield) – exclusion of small parcel of land in the south east following further evaluation for the Growth Plan Change;
  - remove site T-41 (88 Valley Road, Wakefield, residential), since there are better performing comparable sites that have been proposed in submissions in Nelson;
  - remove site T-54 (Teapot Valley, Brightwater, rural residential), since there is a better performing comparable site (T-198) that has been proposed in submissions.
6. If the FDS Subcommittee recommends amending any of the changes identified above or makes any other changes to sites included in the FDS, it will have an impact on overall capacity of housing land or business land provided and may require further analysis during deliberations hearings.
7. There have been a number of new sites proposed for consideration in the submissions and full details are provided under theme 14 of this report. Where a site is proposed for inclusion in the draft FDS, as it accords with the methodology for site selection outlined under theme 14, surrounding landowners have been contacted and their views obtained about the proposal. In a small number of cases the site was not proposed by the landowner but by an unrelated submitter and so the landowner’s views have also been obtained. This information will assist the Subcommittee to understand the views and preferences of people who may be affected by the changes.
8. There are a number of attachments to this report, these comprise:
- 1.8.1 Attachment 1 – schedule of speakers at the submissions hearing who appeared
  - 1.8.2 Attachment 2 – minutes from the four days of hearings
  - 1.8.3 Attachment 3 – Submissions summary report (by Barker and Associates)
  - 1.8.4 Attachment 4 – Analysis report for deliberations (by Barker and Associates), containing appendices on revised residential capacity analysis and Sense Partner’s review of selected submissions
  - 1.8.5 Attachment 5 – Tasman District Council officers’ memo on Vehicle Kilometres travelled and Greenhouse Gas emissions model
  - 1.8.6 Attachment 6 – Questions raised by FDS Subcommittee during hearings and responses.

These attachments will be distributed under separate cover.

## 2 Draft Resolution

**That the Nelson Tasman Future Development Strategy Subcommittee:**

- 1. receives the Deliberations Hearing - Nelson Tasman Future Development Strategy 2022-2052 RSH22-05-8; and**
- 2. notes that the Future Development Strategy (FDS) Subcommittee has received all the written, verbal and late submissions on the draft FDS and supporting information; and**
- 3. recommends to the Joint Committee of the Nelson City and Tasman District Councils that the following changes be included in the final FDS 2022-2052 and that it instructs officers to amend the relevant documents to incorporate the following changes:**

## **Growth Projections**

- 3.1.1 retain the high growth population projection for sensitivity testing in the FDS, to ensure the Councils have identified sufficient capacity if the population continues to grow quickly;**

### **Housing land capacity calculation and uptake rate for housing intensification**

- 3.1.2 retain the 15% uptake rate from the draft FDS document in calculating the expected yield of dwellings from intensification;**

### **FDS Outcomes**

- 3.1.3 direct officers to replace the term “outcomes” with the term “objectives” in the final FDS document;**

### **Multi Criteria Analysis Framework**

- 3.1.4 retain the Multi Criteria Analysis method used in the draft FDS and agree that it represents a robust approach to the assessment of potential growth sites throughout the regions;**

### **Greenhouse gas emissions reduction**

- 3.1.5 include in the FDS comment that there are conflicting demands between the climate change direction and the housing capacity direction provided by central government and that balancing these demands is challenging;**
- 3.1.6 accept the preliminary analysis undertaken on modelling GHG emissions;**
- 3.1.7 retain the draft FDS core spatial scenario of consolidated growth focused largely along State Highway 6 from Atawhai to Wakefield, but also including Māpua and Motueka to meet the needs of Tasman rural towns;**
- 3.1.8 adopt the core part of the draft proposal and accept that the preliminary analysis on modelling GHG emissions is appropriate for considering the competing demands of the climate change and housing capacity direction from central government;**
- 3.1.9 ensure that the FDS implementation plan (updated annually) closely monitors population growth trends and the proportion of intensification and greenfield areas that are enabled by rezoning and rule changes in Plan Changes across the regions;**

### **Greenfield/brownfield housing capacity split**

- 3.1.10 amend the greenfield/intensification split to that detailed in section 12.22 of this report following the outcome of the analysis and decision making at earlier stages of the FDS;**

### **Proposal for a new community near Tasman village**

- 3.1.11 remove all three sites near Tasman village (T-166, T-167, T-168, Aporo Road, Marriages Road, Horton Road and Stagecoach Road) and Braeburn Road, Lower Moutere (T-136) from the draft FDS, and exclude new site T-202 (Hayden-Payne land, 583 Tasman View Road and adjoining block) in Lower Moutere proposed through submissions (the site references can be found on the GIS viewer on the Councils’ FDS webpages and will be explained in the FDS);**

### **Infrastructure**



**3.1.12 retain the draft FDS approach of not including detailed infrastructure information or site sequencing information and instead leaving this information to its more appropriate locations in the infrastructure strategies, asset management plans, long term plans and development contribution policies of both Councils;**

**Building Height – Nelson**

**3.1.13 retain the indicative building number of storey recommendations in the draft FDS, noting that they will be subject to further analysis in any future plan change processes;**

**Natural Hazards – The Wood and Tahunanui**

**3.1.14 remove the Tahunanui slump area from the pink and white coloured infill area shown on the FDS maps noting that the draft FDS approach to natural hazards remains otherwise unchanged;**

**3.1.15 retain the FDS areas in the suburbs of The Wood and Tahunanui in the FDS subject to the outcomes of the climate adaptation Dynamic Adaptive Policy Pathways process underway currently;**

**3.1.16 differentiate the FDS areas in 3.1.15 above with different colour or overlay in the FDS maps, in order to highlight that they have not been included in the housing capacity numbers in the FDS;**

**Strategic areas – Nelson airport**

**3.1.17 remove area N-102 (Roto Street and surrounds) and part of N-034 (Tahuna Drive West) inside the 55dBA airport noise contour in response to concerns from the Nelson Airport management regarding noise sensitivity and in recognition of the strategic importance of the airport to the regions (the site references can be found on the GIS viewer on the Councils' FDS webpages and will be explained in the FDS);**

**Strategic areas – Port Nelson**

**3.1.18 retain no FDS development areas for the Port Nelson land in recognition of the strategic importance of the Port to the regions;**

**Nelson City Council FDS sites**

**3.1.19 expand both areas N-011 (Saxton) and N-112 (Orphanage West) by adding two additional areas called N-115 (Saxton Extension) and N-116 (Orphanage West Extension) while leaving the area N-011 as a single residential greenfield expansion area with any other land use to be considered as part of a plan change or resource consent application;**

**Tasman District Council FDS sites**

**3.1.20 add site T-198 (Falcon Ridge, Higgins Road, Brightwater, rural residential) and remove site T-54 (Teapot Valley, Brightwater, rural residential);**

**3.1.21 change existing site T-28 (Pigeon Valley Road, Wakefield, residential) to rural residential from standard residential and add adjoining site T-200 (Pigeon Valley Road, Wakefield);**

- 3.1.22 add sites T-205 (14 Waiwhero Road, Motueka Valley, rural residential) and T-213 (319 Motueka Valley Highway, rural residential) to existing FDS site T-17 (either side of Mytton Heights, Motueka);**
- 3.1.23 add site T-206 (Hickmott Place car park, Motueka, mixed use);**
- 3.1.24 add site T-217 (1 Main Road, Tapawera, residential);**
- 3.1.25 add site T-219 (3177 Korere Tophouse Road, St Arnaud, rural residential) to adjoin the existing FDS site T-181 (3103 Korere Tophouse Road, St Arnaud, rural residential);**
- 3.1.26 change the boundary of FDS site T-01 (Jeffries Road, Brightwater, residential) to include the whole of the landowner's property (106 Jeffries Road) but also to remove a small southern portion (75 Jeffries Road), where the landowner is not supportive;**
- 3.1.27 exclude site T-003 (Shannee Hills, Brighwater, residential) as the landowner is not supportive;**
- 3.1.28 exclude site T-48 (Rototai Road, Tākaka, residential) as the landowner is not supportive;**
- 3.1.29 reduce size of FDS site T-37 (Fairfax Street, Murchison, residential);**
- 3.1.30 amend the orientation of site T-145 (Page Road, Tākaka, Light industrial);**
- 3.1.31 reduce the overall scale of site T-195 but include a small parcel of land (Massey Street, St Arnaud, papakāinga);**
- 3.1.32 extend the boundary of site T-05 (Wanderers Avenue, Brightwater, residential) to align with the Growth Plan Change boundary following further evaluation and to allow for an esplanade reserve;**
- 3.1.33 extend site T-42 (Stafford Drive, Māpua, residential) to the south-west corner of site to align with the Growth Plan Change;**
- 3.1.34 exclude a small parcel of land in the south-east of site T-107 (Edward Street, Wakefield) following further evaluation for the Growth Plan Change;**
- 3.1.35 remove site T-41 (88 Valley Road, Wakefield, residential);**
- 3.1.36 remove site T-54 (Teapot Valley, Brightwater, rural residential);**

**(note: the site references can be found on the GIS viewer on the Councils' FDS webpages and will be explained in the FDS);**

**Understanding of views and preferences of the community and persons affected by decisions:**

- 4. agree that the FDS Subcommittee has an accurate understanding of the community's opinion on the new sites proposed for inclusion in and the sites proposed to be amended or deleted from the FDS in 3.1.20 to 3.1.36 above, either through general submissions and the hearings and/or subsequent limited further consultation;**

**Other matters raised by the FDS Subcommittee:**

- 5. notes that staff will prepare principles to guide the staging and rollout of development areas for inclusion in the final FDS and that these principles will be used in the preparation of the implementation plans which will also involve consultation with infrastructure providers;**

- 6 agree that this deliberations report and the attachments provided in response to questions from the Subcommittee, provide the information required by the Subcommittee to make fully informed recommendations to the Joint Committee of the Nelson City and Tasman District Councils on the final FDS; and**
- 7 recommend to both Councils that they explore the use of Inclusionary Zoning and consider plan provisions that make a range of section sizes mandatory, while retaining flexibility over housing typologies built, in housing plan changes and/or plan reviews; and**
- 8 direct officers to start making the changes resulting from the resolutions in this report and any other minor changes required to complete the final FDS and its attachments pending the policy decisions from the Joint Committee; and**
- 9 acknowledges that there have been a number of requests and proposals in submissions that have not been addressed by specific decisions as a result of this report and agrees not to make any changes in response to those submissions which have not been outlined in the earlier parts to this resolution; and**
- 10 also acknowledges that submitters will each receive a response to their request.**

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## 4 Purpose of the Report

- 4.1 The purpose of this report is to:
- 4.1.1 provide a detailed summary of the submissions received on the Nelson Tasman Future Development Strategy (FDS) 2022-2052 and supporting information and analysis of key submission themes;
  - 4.1.2 provide the FDS Subcommittee with an opportunity to discuss and obtain advice from officers on the matters raised in the submissions, as well as discuss the responses officers have provided to its questions raised during the hearings (provided in Attachment 6 to this report); and
  - 4.1.3 seek recommendations on the changes that are to be included in the final FDS and technical report, which will be considered by the Joint Committee of the Nelson City and Tasman District Councils on 27 July 2022. The intention is for the Joint Committee of the Nelson City and Tasman District Councils to consider adopting the policy decisions arising from the FDS on 27 July and for the same Joint Committee to either consider adoption of the FDS itself by the end of August, or delegate adoption to the FDS Subcommittee by the end of August.
- 4.2 This report is structured so as to align with the key themes raised through the submissions on the FDS during consultation. Officers have grouped the issues raised in submissions into key themes and the majority of points raised in the submissions have been covered. Attachment 3 to this report “Submissions summary report” provides a comprehensive summary of all the responses to the survey, which formed part of the Statement of Proposal.
- 4.3 The data discussed in this report is based on the total number of submissions received as at 26 April 2022.

## 5 Background and Discussion

- 5.1 The proposals included in the FDS Statement of Proposal (which included a Summary of Information and Draft Future Development Strategy) and the supporting technical information have been developed over the last 12 months. Confidential briefings on the draft FDS have taken place with elected members from both Councils on 19 October 2021, 16 November 2021, 24 January 2022 and 8 February 2022. On 8 March 2022, the Joint Committee approved the commencement of a Special Consultative Procedure on the draft FDS Statement of Proposal with the consultation period to run from 14 March to 14 April 2022.
- 5.2 The Statement of Proposal asked the community for feedback on the core part of the proposal (consolidated growth focused largely along State Highway 6 from Atawhai to Wakefield, but also including Māpua and Motueka and meeting the needs of Tasman rural towns), and a secondary part (creation of a new community near Tasman village and Lower Moutere (Braeburn Road)). It also asked for feedback on:
- 5.2.1 the 11 outcomes for future development in the regions (note these were the agreed outcomes of the draft FDS put together by the project team, the community (engagement round October 2021), iwi, stakeholders and the Councils. The community was asked whether they agreed with them.
  - 5.2.2 the intensification proposals by area;
  - 5.2.3 the greenfield expansion proposals by area;

- 5.2.4 the balance of greenfield development and intensification;
  - 5.2.5 the business growth sites proposed;
  - 5.2.6 whether there are any additional areas that should be included for housing or business growth;
  - 5.2.7 whether the balance was right for growth in the rural towns; and
  - 5.2.8 whether there was anything else important to guide growth in the regions, that was missed.
- 5.3 While the survey was detailed, it has enabled officers to analyse responses by geographical area which is important in guiding future development for the regions.
- 5.4 The Statement of Proposal proposed meeting identified demand for housing and business land for both a medium growth and high growth population scenario, so that the Councils can accommodate growth demands if high population growth continues, particularly in Tasman. Under a high growth scenario this equates to 24,000 homes in the urban environment and 5,100 homes in rural Tasman, totaling approximately 29,000 homes for the regions. For business land, under a high growth scenario the Councils would need 48ha of commercial and 20 ha of industrial land. The Councils have plenty of capacity to cater for this growth over the long term, with the Housing and Business Assessments showing that capacity exists for about 88 hectares of commercial land and 50 hectares of industrial land over the next 30 years. However, this capacity is not spread equally throughout the regions, nor is it all currently serviced, with anecdotal shortages existing in towns like Richmond and Motueka following a survey undertaken in 2021.
- 5.5 The supporting documents that were relied upon to prepare the Statement of Proposal include:
- 5.5.1 Tasman Housing and Business Capacity Assessment 2021;
  - 5.5.2 Nelson Housing and Business Capacity Assessment 2021;
  - 5.5.3 Combined Tier 2 Nelson Tasman Housing and Business Capacity Assessment 2021;
  - 5.5.4 “Housing We’d Choose” report 2021 (Market Economics);
  - 5.5.5 Nelson Tasman Business land demand forecasting study 2021 (Sense Partners);
  - 5.5.6 Tasman population projections 2021-2051;
  - 5.5.7 Nelson population projections 2021-2051;
  - 5.5.8 All National Policy Statements; and
  - 5.5.9 Relevant National Environmental Standards.
- 5.6 Public consultation commenced on 14 March 2022 and closed on 14 April 2022 at 5.00 pm. Due to the red traffic light setting on the Covid Protection Framework, the consultation was online including 17 webinars hosted by both Councils. There were approximately 300 participants in these webinars. Many questions were asked at the webinars and these were very wide ranging, but the recurring themes raised in these can be summarised as follows:
- 5.6.1 concerns about the submission timeframes;
  - 5.6.2 importance of active and public transport provision;
  - 5.6.3 density thresholds for viable public transport;
  - 5.6.4 affordability of housing, particularly in Wakefield, Tapawera, Golden Bay;

- 5.6.5 intensification uptake levels;
  - 5.6.6 lack of focus on decarbonisation within the draft FDS and low emissions transport;
  - 5.6.7 some concern about height limits – that six storeys is too high;
  - 5.6.8 concern about the proposals near Tasman Village – misaligned with NPS-UD, concern about carbon emissions from residents travelling to work and not supported by iwi;
  - 5.6.9 importance of maintaining local character and visual amenity of Tahunanui with intensification;
  - 5.6.10 questioning endless/exponential growth and that the Councils should constrain growth rather than providing for it;
  - 5.6.11 population projections – concern that they are too high in some areas or do not reflect the need for affordable homes in others (especially Tākaka/Golden Bay, Tapawera);
  - 5.6.12 natural hazards particularly coastal inundation and flooding and concern about proposed growth in areas subject to these;
  - 5.6.13 iwi engagement and how this has been undertaken;
  - 5.6.14 protecting productive land;
  - 5.6.15 incorporating human environment factors into the mapping;
  - 5.6.16 some confusion about how the FDS is different to plan changes or the District plan with questions relating to particular zoning provisions and controls and requests for rezoning of land;
  - 5.6.17 issues with regard to growth in the Maitai Valley;
  - 5.6.18 need to provide for job opportunities in rural areas as well as housing;
  - 5.6.19 questions about infrastructure and development sequencing and funding;
  - 5.6.20 demand for smaller homes and sections particularly in Wakefield – FDS should reflect this;
  - 5.6.21 visual amenity/local character.
- 5.7 The Councils received 568 submissions throughout the consultation period (14 March to 14 April inclusive 2022), including five late submissions which were accepted by the FDS Subcommittee on the first day of the hearings. Hearings were held between 27 April and 3 May 2022. 120 submitters presented their submissions to the FDS Subcommittee all via audio-visual link – 29 on day one, 35 on day two, 19 on day three and 37 on day four. Each submitter was given 10 minutes to present to the FDS Subcommittee.
- 5.8 There is a detailed summary of the submissions provided at Attachment 3 (Submissions Summary report) and an analysis report at Attachment 4, both by Barker and Associates. The analysis report covers the key components of the draft FDS – base assumptions and methodology, outcomes, growth strategy and its implementation. Key issues arising through submissions on the draft FDS are discussed in that report in this context. Themes 1-14 below arise from the submissions and draw on the analysis report.

### **Iwi of Te Taihu iwi feedback**

- 5.9 A summary of iwi of Te Taihu submissions is provided in Attachment 4 (Analysis report). Submissions were received from Ngāti Apa ki te Rā Tō, Te Ātiawa Manawhenua Ki Te Tau

Ihu Trust, Wakatu Incorporation & Ngāti Rārua Atiawa Iwi Trust. Other than those issues covered under theme 7 (secondary part of the proposal – creation of a new community near Tasman village), key themes arising from these submissions by iwi include:

- 5.9.1 general support for intensification and increased housing supply in existing built up areas, over sprawling low density rural residential development;
  - 5.9.2 consultation and capacity of iwi and hapū – concerns over resourcing and capacity to respond in the timeframes throughout the process;
  - 5.9.3 focus on Te Taiao, especially from Te Ātiawa, relating to achieving net enduring restorative outcomes and opposing the general presumption in the NPS UD on growth;
  - 5.9.4 support for specific sites (T-195 St Arnaud (Ngāti Apa ki te Rā Tō), the papakāinga proposals which have reduced in overall scale requiring a smaller site; sites N-11, T-15, T-102, T-189 and T-190 (Wakatu incorporation and Ngāti Rārua Atiawa Iwi Trust));
  - 5.9.5 maintained opposition to the inclusion of sites within Tasman village, unless agreement can be reached on significant sites (Te Ātiawa Manawhenua Ki Te Tau Ihu Trust).
- 5.10 Through the submissions the Councils received suggestions to include 31 entirely new sites as growth areas and suggestions to amend five sites as growth areas. The Councils also received suggestions to include other sites as growth areas, but these sites had already been assessed as part of compiling the draft FDS.
- 5.11 As soon as officers had mapped the 31 new sites and five amended sites they were distributed to iwi on 29 April for feedback as part of the Multi Criteria Analysis (criteria 18-21). Feedback was sought by 13 May but officers acknowledge the timeframe was challenging due to iwi resources and capacity. To date written feedback has been provided by Manawhenua Ki Mohua and Te Ātiawa Manawhenua Ki Te Tau Ihu Trust. Officers will provide any further feedback during deliberations if it is not received earlier.
- 5.12 Ms Ina Kara-France was appointed by both Mayors to the FDS Subcommittee before the submission hearings commenced, following unanimous support from chairs of eight iwi of Te Taihu. Ms Kara-France has attended all the submission hearings and will be present for the deliberations hearings.

## **6 Assessment of key themes from submissions**

### **Origin of submitters**

- 6.1 A total of 568 submissions were received during the consultation period (14 March to 14 April 2022 inclusive), including 5 late submissions. Submissions were received from locations across Nelson and Tasman including those below:
- 6.1.1 47% from Nelson
  - 6.1.2 9% from Golden Bay
  - 6.1.3 11% from Upper Moutere
  - 6.1.4 6% from Richmond
  - 6.1.5 5% from Māpua/Ruby Bay



- 6.1.6 5% from Motueka
- 6.1.7 4% from Wakefield
- 6.1.8 3% from Murchison
- 6.1.9 2% from Brightwater
- 6.1.10 The remaining 8% came from locations outside the regions, or country, or locations within the regions not specified.

## 7 Theme 1 Growth Projections

### Issues raised in submissions

- 7.1 A number of submissions raised issues with how catering for growth in population is a key focus (some believe flawed) of the draft FDS. There were four main sub-themes as follows:
  - 7.1.1 wanting no growth or very limited growth in order to retain the current community values;
  - 7.1.2 that the draft FDS uses the high growth series in the FDS when it should rely on the medium growth series;
  - 7.1.3 criticism of the methodology used for developing the population projections;
  - 7.1.4 concern about the draft FDS being focused on ‘meeting demand’ instead of on managing demand within the carrying capacity of the land, particularly as this relates to protecting the environment and managing the impacts of climate change.
- 7.2 Question five of the submission form asked “Please indicate whether you support or do not support Outcome 5: Sufficient residential and business land capacity is provided to meet demand.” A total of 340 submitters answered this question with the responses as follows:
  - 7.2.1 29 people strongly agreed (11%) and 91 people agreed (27%)
  - 7.2.2 77 people disagreed (23%) and 16 people strongly disagreed (16%)
  - 7.2.3 65 responded with ‘neutral’ (19%)
  - 7.2.4 21 responded with ‘Don’t know’ (6%)
  - 7.2.5 3 responded with ‘N/A’ (1%)
- 7.3 A related request was made by the FDS Subcommittee during hearings for data on building consents for the past 3 years, to be shown spatially. This is addressed below.

### Officers’ comments

- 7.4 The Councils have a legal obligation under sections 30 and 31 of the Resource Management Act 1991 to provide sufficient development capacity in relation to housing and business land to meet the expected demands of the region/district.
- 7.5 The Councils also have a legal requirement to provide for sufficient housing and business land capacity to meet demand at all times (policy 2 of the National Policy Statement on Urban Development) (NPS UD). Clause 3.13(a)(ii) sets out the purpose of an FDS as:
  - 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.*

- 7.6 The FDS needs to provide for development capacity to meet expected demand. This expected growth is determined by the population projections that the Councils adopt for their Long Term Plans (LTPs) and FDS.
- 7.7 The demand for new dwellings is also partly driven by a decrease in household size (the average number of residents per household). With an ageing population, Nelson and Tasman need to attract working-age migrants to our regions which means some population growth is necessary. Please see Dr Natalie Jackson's population projections report at [Growth model | Tasman District Council](#) and Tasman's age friendly policy for evidence, [Age-friendly policy | Tasman District Council](#). Also please see [Nelsons City for All Ages Strategy](#).
- 7.8 For Tasman the FDS growth assumptions were based on the medium growth scenario of 2019 population projections provided by an independent and experienced demographer (see [Growth model | Tasman District Council](#)). At the time, the medium scenario was in line with recent population and development trends, however Tasman has since already exceeded these projections. Stats NZ estimates for the 12 months to June 2021 show that even with New Zealand's borders being closed due to Covid-19 Tasman's population grew by 900 people. This was as a result of more births than deaths and internal migration. Two thirds of the population increase were amongst the over 65s.
- 7.9 The Nelson medium series population projection was prepared in-house, and peer reviewed by an external consultant. The FDS models a marginally higher projection based on the Stats NZ high projection for Nelson to allow the document to be resilient to changes in demand from that projected.
- 7.10 The Councils review the growth assumptions for each LTP (every three years) and therefore have the opportunity to fine tune the roll-out of rezoning and servicing of land to meet demand as it may change between now and the next LTP. Similarly, the FDS is required to be reviewed every three years and a new one prepared every six years which gives further opportunity for adjustment
- 7.11 In relation to the suggestion by some submitters of managing growth demands within the carrying capacity of the land, 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 councils 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 universities) and Council monitoring has steadily grown over the last few decades. A few relationships between land uses or activities and a particular 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 foreseen tipping point. Even when known tipping points are recognised, there are factors that seem to over-ride sustainable management. One example of this is that sometimes highly productive land is proposed for development where the parcel size is too small to practically be productive. However if greenhouses or hydroponics were proposed on the site it could be very productive. So, there are many different values and outcomes to consider for "carrying capacity" and compromises that society can tolerate.

- 7.12 In relation to the request from the FDS Subcommittee **for building consent data spatially for dwellings for the past three years**, the following analysis has been put together based on both Councils' annual monitoring reports required under the NPS UD:

*Consented new residential buildings*

<b>Year ending December</b>	<b>Dec-19</b>	<b>Dec-20</b>	<b>Dec-21</b>
Total Nelson and Tasman	812	803	768
Nelson	312	253	246
Tasman	500	550	522
Richmond	262	275	271
<i>Richmond West</i>	<i>181</i>	<i>207</i>	<i>192</i>
<i>Richmond South</i>	<i>32</i>	<i>13</i>	<i>33</i>
<i>Rest of Richmond</i>	<i>49</i>	<i>55</i>	<i>46</i>
Motueka	51	32	16
Māpua	19	30	29
Brightwater	4	39	23
Wakefield	28	15	33
Moutere	62	81	69
<i>Moutere Hills</i>	<i>56</i>	<i>70</i>	<i>60</i>
Golden Bay	28	26	34

- 7.13 This table shows that more dwellings have been consented in Tasman than Nelson for the past three years and within Tasman, Richmond accounts for over half of those consents.

### Options

- 7.14 As a result of the statutory requirements of the NPS UD, only the choice of either the projected population growth series or the methodology used in developing the growth projections, can be considered further. The FDS Subcommittee therefore has the following options available:
- Option 1: Retain the high growth population projection for sensitivity testing in the FDS, to ensure the Councils have identified sufficient capacity if the population continues to grow quickly; and
  - Option 2: Adjust the draft FDS to rely only on the medium growth series in the draft FDS put to public consultation.
- 7.15 As detailed above, the two growth projections series (medium and high) referred to in the draft FDS have been through a robust development process either via a highly experienced demographer or via a series of peer reviews by a consultant. These projections were adopted for both Councils' Long Term Plans 2021-2031 (LTPs). These two projections are therefore considered to be the best available given the information available at the time they were developed and are suitable for use in the FDS.
- 7.16 Population growth in Tasman is already exceeding the medium growth series, adopted for its LTP in 2021. If the FDS only relied on this growth series it would be out of date already.

- 7.17 In considering which of the two growth series referred to in the draft FDS to adopt, using the high series provides a greater certainty that there will be the provision of “at least” sufficient development capacity over the next 30 years, as required by the NPS UD.

### **Officers’ recommendations**

- 7.18 No changes to the draft FDS are recommended as a result of the issues raised by submitters on this theme. Council officers recommend option one be adopted.

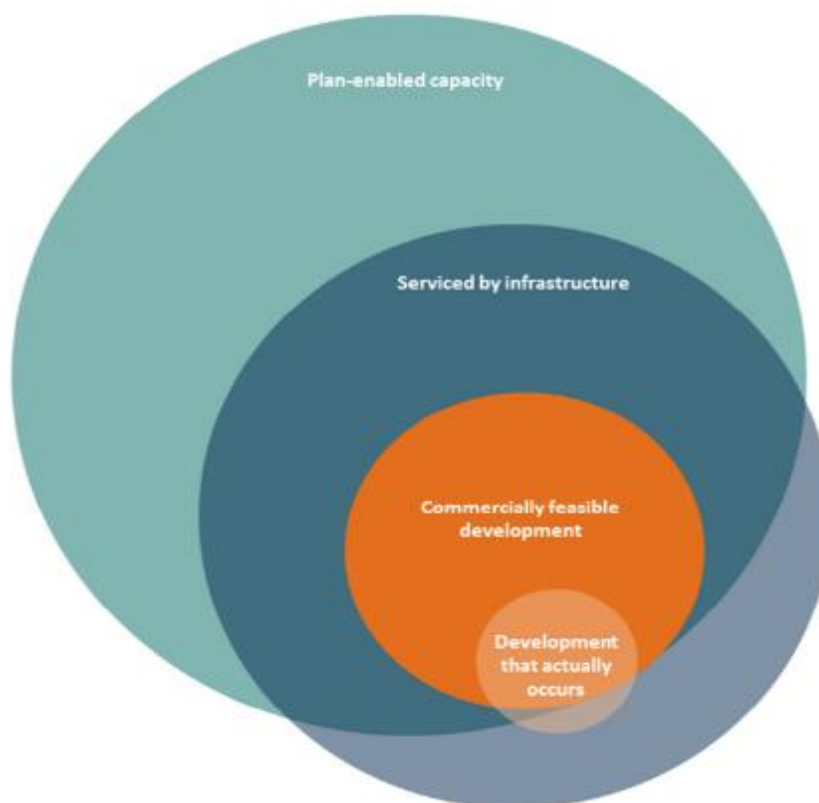
## **8 Theme 2 Housing land capacity calculation and uptake rate for housing intensification**

### **Issues raised in submissions**

- 8.1 There is a strong theme of submitters raising concerns regarding the capacity calculations for housing land. In particular:
- the proposed intensification uptake rates are too slow and conservative to suitably prioritise intensification and increase the pace of change in urban areas; and
  - the FDS relies on intensification through incremental backyard, infill developments rather than comprehensively designed development areas.
- 8.2 In relation to Nelson: submitters raised the importance of prioritising intensification and speeding up the uptake of this type of development (86 submitters) and concern that ‘very slowly over time’ is not prioritising intensification enough and that this should be reflected in an increase in uptake rates and more comprehensively designed intensification.
- 8.3 In relation to Stoke: 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).
- 8.4 In relation to Richmond: there was support for intensification but concern that this is not prioritised enough and there is too much focus on infill development rather than comprehensively designed developments (22 submitters).
- 8.5 Specific submissions such as Kāinga Ora’s and Nelson Tasman 2050’s were also critical of the uptake rate. Kāinga Ora considered the draft FDS has underestimated feasible development capacity within the urban area. Nelson Tasman 2050 had similar concerns and specifically challenged the approach that involves incremental intensification. 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.

### **Officers’ comments**

- 8.6 The NPS UD requires that any housing capacity analysis considers the feasible level of development that is likely to happen. In the case of the Nelson/Tasman regions, brownfield intensification will occur in an environment with highly fragmented property ownership. As a result, the uptake of intensification is likely to be relatively piecemeal with very few consolidated sites. Figure 1 below shows councils’ standard process from plan enabled to realised development (source Greater Christchurch Partnership 2018).

**Figure 1 Councils' standard process from plan enabled to realised development**

- 8.7 To understand the likely uptake rate, Sense Partners were engaged by the Councils to provide advice to the FDS team regarding the likely uptake rate for intensification. The uptake rate provided was in the form of a range. The lower end of that range was 15% over a 30 year period. This was further analysed in response to submissions and was found to be relatively consistent with the uptake rates for Nelson and Tasman over the last few years for intensification. See Attachment 4 and its appendix on revised capacity calculations by Barker and Associates.
- 8.8 Uptake rates of between 5% and 35% (at 5% intervals) were applied to the FDS intensification areas and broader infill areas. Capacity was also tested against all intensification typologies proposed in the draft FDS (ie all intensification areas would enable six storey residential development). This sensitivity testing revealed that to meet housing demand, by intensification only, between 30-35% of all sites in residential zones and commercial centres would be required to be redeveloped over the next 30 years and this would be towards the six storey density.
- 8.9 The “Analysis report ” Attachment 4 and its appendix on revised capacity calculations provides details of uptake of intensification in Nelson and Tasman to date. Within Nelson’s higher density area the uptake rate to date is 7.5%. Most of this has been infill to date, rather than redevelopment or the densities envisaged in the draft FDS.
- 8.10 Intensification in an urban centre like Nelson is still a relative unknown. While work continues on a Plan Change to enable greater intensification there will always be the risk that whatever uptake rate is chosen, it is more likely to be different to what eventually occurs. The key decision being that intensification relies on individual allotments and personal decisions landowners make.

- 8.11 It is considered prudent to be conservative in choosing an uptake rate to ensure that enough greenfield development is planned for to ensure that there will be the provision of “at least” sufficient development capacity over the next 30 years, as required by the NPS UD.
- 8.12 Within Tasman’s Richmond Intensive Development Area (RIDA), the intensification uptake rate over the last five years indicates a rate of between 13.1% and 14.6% of sites coming forward. The level of development that has so far occurred in RIDA is less, in terms of number of storeys, than is anticipated by the FDS. Most of it has been single storey to date with some two storey developments but there has been redevelopment as well as infill.
- 8.13 Dr Kirdan Lees of Sense Partners has also undertaken analysis of the FDS intensification uptake rate, in response to submissions and this is provided in Attachment 4 “Analysis report” (appendix on review of selected submissions). He has found that the method for calculating the ultimate capacity for intensification before application of the uptake rate is consistent with that used in other areas of the country such as Kāpiti and Wellington. The method used allowed for a single analysis method covering both Nelson and Tasman which was seen as a critical step if the FDS was to be considered a properly joint strategy.
- 8.14 Meetings that took place with Kāinga Ora’s consultants (Property Economics) subsequent to the hearings concluded as follows - Kāinga Ora clarified their position on this matter and confirmed that the 15% uptake rate was at the lower range of potential development (see the Barker’s analysis report and its appendices at Appendix 4). In other words, the uptake rate is reasonable, albeit conservative. Officers consider 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. Nelson Tasman 2050’s economic consultant was invited to the same meetings but declined to be involved.
- 8.15 Both Councils have robust monitoring of the level and type of dwelling being brought to the market and will continue to monitor the intensification uptake rate over time to allow the roll-out of greenfield land to be adjusted over time, if possible.

### **Options**

- 8.16 The project team has revisited the assumptions on uptake of intensification, following submissions on this issue. Sense Partners has reviewed the assumptions and methodology in the draft FDS and compared it with other regions in NZ and has found it to be consistent. The Sense Partners analysis considers “at first glance ...the brownfields development rate (about half) across the Nelson Tasman area might be difficult to achieve” but finds there are mitigating factors.
- 8.17 The assumptions on intensification uptake have been peer reviewed by an independent consultant. Council officers consider there are no further options available. The methodology has been found to be sound. Officers have also compared the uptake rate with the level of uptake currently occurring in Richmond and Nelson now and have reached the view that it is consistent with the assumptions.

### **Officers’ recommendations**

- 8.18 No changes to the draft FDS are recommended as a result of the issues raised by submitters on this theme.

## 9 Theme 3 FDS Outcomes

### Issues raised in submissions

- 9.1 On assessment of the responses to the draft FDS outcomes, it is apparent that there has been some confusion amongst submitters as to their purpose and how they should respond to them.
- 9.2 The original intent in developing the outcomes was to define a set of high level statements that would describe what the draft FDS was ultimately striving for. The outcomes were developed with reference to the range of national policy statements and legislation that influence the FDS and adjusted with input from elected members of both councils, feedback from FDS community engagement in 2021, iwi and stakeholders.
- 9.3 The final draft outcomes that were put to the public for consultation were intended to represent the outcomes the community wants to see from future development and there was no attempt to prioritise them or moderate one outcome with another. For example, there are known and acknowledged conflicts between multiple national policy statements - for example outcomes to meet all growth demands (as required by the NPS UD), could be seen as a conflict with the outcomes for freshwater (NPS FWM) (natural environment). The purpose was for each of the outcomes to stand alone in their inspiration rather than be damped by any of the other outcomes. The Councils were asking the community whether it agreed with these outcomes.
- 9.4 This phrasing of the outcomes resulted in the following variations on how they were responded to in submissions:
- 9.4.1 a large proportion of submitters took the outcomes to be a measure of whether the FDS was successful or not and selected the disagree or strongly disagree options, before pointing out that that the FDS did not go far enough to meet the particular outcome they considered important. In most cases it is clear from the written response that they did actually agree with the outcome but just wanted this emphasised more in the draft FDS;
- 9.4.2 some submitters thought that the outcomes reflected the current situation in the regions and disagreed;
- 9.4.3 greater than 70% of submitters responded in the expected fashion agreeing or disagreeing with each outcome as an aspiration; and
- 9.4.4 a small proportion but still significant number of submitters mixed the two approaches outlined above together.
- 9.5 The following example illustrates a submitter who thought the FDS did not go far enough to meet an outcome

Subject	Answer	Summary
01 Please indicate whether you support or do not support Outcome 1: Urban form supports reductions in GHG emissions by integrating land use	Strongly disagree	If the Tasman Bay Village is adopted this will lead to a huge increase in cars in the area. If there are to be around 3200 new dwellings in Tasman / Moutere this will increase emissions. Each house is likely to have at least one vehicle if not two. This is a predominantly rural area and to suggest people will utilise public transport, even IF it is ever available at

Subject	Answer	Summary
transport. Please explain your choice		sufficient frequency, there is no getting away from the fact most people will continue to use their cars to get from A to B

9.6 In this example, the text response in the summary column clearly is at odds with the option chosen in the answer column. This submitter actually agrees that the regions should be aspiring to be limit green house gas (GHG) emissions as opposed to the “strongly disagree” that has been chosen.

9.7 Nelson Tasman 2050 submitted that the term “objectives” would be a better term to use and that it would be more clearly understood by a wider range of people. Council officers agree and recommend that the terminology change to this in the final FDS document.

#### Officers’ comments

9.8 This deliberations report summarises the responses on the basis that they have been completed as anticipated but notes where there have been obvious deviations from the originally expected responses. Where the responses to the outcome questions have been obviously treated differently by submitters for a large proportion of the responses, no summary is provided.

#### Options

9.9 No options are presented for this theme as it is considered a technical issue relating to understanding of the responses by the Subcommittee rather than an issue raised regarding the intent or contents of the draft FDS document itself.

#### Officers’ recommendations

9.10 As stated above, Council officers recommend that the term “outcomes” is changed to “objectives”.

## 10 Theme 4 Multi Criteria Analysis Framework

### Issues raised in submissions

10.1 Officers have formed the view that most submitters reviewed the results of the analysis rather than the underlying technical report and the multi criteria analysis framework that was used to assess the 189 sites for the draft FDS. This is not surprising as this is a relatively complex part of the methodology. Following a request from one submitter the actual scoring framework for the assessment was placed on both Councils’ websites, rather than relying on the “traffic light’ display of results provided in the technical report (appendix 4 pages 93-96.)

10.2 Submitters who have used the Nelson Tasman 2050 template (approximately 27, with more answering certain questions than others), have criticised the multi criteria analysis (MCA), stating that:

10.2.1 use of an MCA is questionable and that when many criteria are used, changes in weightings make little difference;



- 10.2.2 when comparing the unweighted and weighted sites scores, there is little difference between the average scores (eg for human health effects and landscape values);
  - 10.2.3 that very few of the 22 criteria reflect the NPS UD's objectives;
  - 10.2.4 that carbon emissions are only represented in 20% of the total score in the framework;
  - 10.2.5 that the integrity of the MCA methodology appears even more compromised seeing that as an alternative to accessibility by active and public transport, accessibility by private vehicle can also add a score for a site;
  - 10.2.6 that the MCA discredits the integrity of the FDS.
- 10.3 Some submitters (eg #31805) found the MCA very sound e.g.. “comprehensive MCA framework offered for this process provides a comforting level of overall context (holism) upon which to base analyses and draw conclusions – a very sound, responsible and welcome approach.”
- 10.4 Waka Kotahi (#31655) concluded that the MCA “emphasises the importance of accessibility by public and active transport as well as private vehicle to employment, education and social opportunities. However the assessment does not seem to factor in provision of safe multi modal transport opportunities” and Waka Kotahi suggests it will be able to assist with this during the rezoning stage.
- 10.5 Other submissions that mentioned the MCA, raised the following issues:
- 10.5.1 that the MCA should have included the carbon emissions from the building of dwellings and business units in the assessment e.g. steel and concrete use
  - 10.5.2 queried how the criteria for the MCA have been chosen and that zero carbon should have been one of them
  - 10.5.3 that the MCA spreadsheet ranks three flat good soil areas as the highest for development
  - 10.5.4 that the MCA scoring spreadsheet shows inconsistencies in column 15, while the constraints map shows coastal and river flooding, only three locations are noted as having significant or potential issue and not the low lying areas of N108 (City Centre north), N109 (The Wood South), N100 (Griffin site, Nelson), and N016 (Neale Park).
- 10.6 Related questions that arose from the FDS Subcommittee during hearings related to the MCA were:
- 10.6.1 whether the Intergovernmental Panel on Climate Change (IPCC) report has been taken into account in the MCA?
  - 10.6.2 whether the MCA has assessed reverse sensitivity or land use compatibility?

### **Summary of MCA process**

- 10.7 A summary of the process is provided below for convenience, since few submitters reviewed this.

### **MCA process**

- 10.8 The MCA was revised from that used for the 2019 FDS to reflect the NPS UD requirements, other National Policy Statements that have emerged since the last FDS, relevant legislation and community, iwi and stakeholder feedback.

- 10.9 The development of the outcomes for the FDS was partly based on the opportunities and constraints mapping undertaken at the outset for the FDS. The outcomes were also scoped with the community (from feedback during the engagement round in October 2021), feedback from iwi (particularly criterion 11) and stakeholders and the two Councils during confidential briefings.
- 10.10 The next stage was an evaluation of broad spatial scenarios for accommodating growth across the regions. Such an evaluation is required by the NPS UD (clause 3.14). Section 7 of the FDS technical report outlines this. The third stage was an evaluation of specific sites (189) across the regions and this required assessing all sites through MCA based on more detail and site specific information. This assessment was undertaken by technical specialists in each area of work, according to the criterion, including resource scientists on land and soils, natural hazards; infrastructure engineers covering three waters and transport; reserves and community facility planners; freshwater scientists including wetlands; natural resources and subdivision planners; biodiversity and biosecurity scientists. The sites were then allocated to the various spatial scenarios depending on their geographical location. Each scenario was then tested to get an understanding of how well each scenario performed in meeting forecast housing demand under both medium and high-growth scenarios.
- 10.11 The MCA identified some 'no-go' constraints where a site would be excluded from consideration within the draft FDS if it scored zero or in some cases one for a particular criterion. Sections 6.2.3 and 8 of the FDS technical report provide details. The four no-go criteria were:
- 10.11.1 **Impact on highly productive land** (criterion 11) – where significant loss of highly productive land (eg LUC 1 and 2) would result. If a site scored zero it was discounted. If it scored 1, it was discounted but was added back in if there were no other alternative (e.g. site T-105 Brightwater employment site and site T-108 Wakefield employment site).
- 10.11.2 **Te mana o te Wai** (criterion 12) - where significant adverse effect on the health of waterbodies including groundwater cannot be mitigated (e.g. a site likely to be within 20m of a surface waterbody (e.g. wetland) and/or lies over unconfined aquifer) and it scored zero, such sites were discounted.
- 10.11.3 **Natural hazards** (criterion 15) – where it is likely that the area will not be habitable (under water/within coastal margin) or have a significant risk to people and property within 100-year timeframe. If it scored zero it was discounted.
- 10.11.4 **Sites of cultural significance** (criterion 17) – where development will have unacceptable adverse effects on identified or unidentified sites of cultural significance, based on feedback from Iwi and hapū.
- 10.12 Testing of some spatial scenarios identified that meeting housing demand under a high growth scenario was challenging due to the potential yield that was discounted as a result of impacts of these 'no go' constraints. As such it was necessary to include some more poorly performing sites within the refined scenarios as they were more aligned with the core part of the proposal where growth is largely focused along State Highway 6. Where sufficient demand was identified, especially across rural Tasman towns, better performing sites under the MCA were selected in preference to lower scoring sites where there was a choice.

- 10.13 Initially all sites were given an unweighted score. Then weighting was applied to help reflect the relevant importance of some criteria based on the policy framework established by the NPS UD as follows:
- 10.13.1 Criterion 1 - accessibility by public and active transport to essential services, employment, education and social opportunities was given a weighting factor of 5;
  - 10.13.2 Criteria 7, 8a, 8b and 8c – efficiency of supporting transport, stormwater, wastewater and potable water infrastructure were given a weighting factor of 2.
- 10.14 These weightings were then used to derive an overall weighted score which was then used to help inform the site selection process.
- 10.15 Following submissions, a further 32 sites were proposed within Tasman (five of these were amendments to existing draft FDS sites) and a further four sites were proposed within Nelson (two of these were amendments to previous sites). These sites were all assessed against the MCA, involving the same officers as previously and this is covered under theme 14 below.

### Officers' comments

- 10.16 In relation to the issues above raised by submitters, officers make the following comments:
- 10.17 **Changes in weightings make little difference** - the MCA and associated weighting has resulted in an outcome 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.
- 10.18 **Little difference between average score for some criteria whether weighted or unweighted** - consideration around human health effects has focused on impacts arising from proximity to particular land-uses that can give rise to adverse health impacts through things like noise, light or spray drift for example. A more detailed consideration of some of the matters raised introduces a larger component of subjectivity on factors outside of the control and scope of the FDS: The assessment of landscape values has been against protected landscapes where there are well-known and defined landscape values (e.g. Outstanding Natural Landscapes). Individual preferences around the value of particular rural landscapes have not been considered.
- 10.19 **Very few of the 22 criteria reflect the NPS UD's objectives** - 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 NPS UD. 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 care-free/low carbon lifestyle is most readily achievable such as the Wood or Tahunanui are also subject to potential risks associated with coastal 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. The need to assess a broader range of objectives and matters is considered by officers to be consistent with the broader requirements of the Resource Management Act 1991 (RMA) when undertaking spatial planning exercises of this nature.
- 10.20 **That carbon emissions are only represented in 20% of the total score in the framework / zero carbon should have been a criterion-** The NPS-UD requires consideration of accessibility by all modes including private vehicles. It is not limited to a

consideration of public transport, walking and cycling. GHG reductions would be an inappropriate criterion to incorporate into a no-go constraint. Reduction in GHGs is also dependent on plans, strategies and policies outside the control of both Councils or the scope of the FDS itself (e.g. congestion charging). 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 discreet areas, some of which require subjective analysis. As such, what constitutes a well-functioning urban environment will vary over the extent of the FDS. It is not a readily measurable criteria nor can it be applied in a consistent manner. As such, it would be inappropriate to incorporate such as criterion as a “pass-fail”.

- 10.21 **“Safe” multi modal transport opportunities** – 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 (ie the future picture). Inevitably some of these plans are at the early stage and the Councils look forward to working closely with Waka Kotahi on these plans.
- 10.22 **The MCA should have included carbon emissions from the building of dwellings and business units** – The FDS is a high level strategy, it does not prescribe building designs or technologies. It is therefore not known at this stage how the construction of such buildings may evolve over the 30 years period. Other methods such as the Building Act control such technologies. Some submitters also suggested the FDS should provide for tiny homes or enabling more than one dwelling per section. This is beyond what can be delivered by the FDS and relies on the existing or proposed rules in each Council’s Resource Management Plan (RMP) instead.
- 10.23 **The MCA spreadsheet ranks three flat good soil areas as the highest for development** – Unfortunately the relevant 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.
- 10.24 **Low lying areas of N108, N109, N100, and N016 not scored appropriately for sea level rise and flood risk** – see theme 11 below.
- 10.25 **Whether the IPCC report has been taken into account in the MCA** – The Ministry for the Environment released Coastal Hazards and Climate Change Guidance for local government in 2017 (2017 Ministry for the Environment (MfE) Guidance). Both Councils have been using this guidance to inform their work programmes on long term adaptation planning for sea level rise, working in partnership with their communities. The 2017 MfE Guidance uses sea level rise projections from the IPCC’s 5th Assessment Report. The IPCC released updated sea level projections in August 2021 (6th Assessment Report).
- 10.26 In early May, the NZ SeaRise Programme released updated national sea level rise projections (drawing on IPCC’s 6th Assessment Report) which also takes into consideration vertical land movement. Officers understand that MfE will shortly be releasing guidance to local government on how to use this new sea level rise information in their adaptation work programmes, and that the 2017 MfE Guidance will be updated.

- 10.27 Tasman District Council's coastal hazards and sea level rise mapping that was released in 2019 follows best practice guidance set out in the 2017 MfE Guidance and looks at a range of sea level rise increments. The mapping does not consider the rate of sea level rise, rather it enables a consideration of a range of emission scenarios (RCPs) and time spans when deciding what particular sea level rise increment is of interest. As part of the FDS MCA process, officers used the extent of our sea level rise mapping which is a 1% AEP (annual exceedance probability) coastal storm-tide and 2m sea level rise. This is consistent with the 2017 MfE Guidance which recommends that for 'coastal subdivision, greenfield developments and major new infrastructure' that planning instruments should 'avoid hazard risk by using sea-level rise over more than 100 years and the RCP8.5H+ scenario'.
- 10.28 In relation to the NZ SeaRise project data that was recently released, it is noted that Tasman District Council had considered the potential for land subsidence exacerbating sea level rise at the time our map was being developed, as officers sought advice from local experts at Beca Ltd. Nelson City officers used 2020 coastal and 2021 flood data to assess the FDS areas and based on a possible higher level of risk some areas have been identified as requiring further assessment. This will be undertaken through Council's Dynamic Adaptive Planning Process (DAPP).
- 10.29 Both the updated IPCC sea level rise projections and the NZ SeaRise project provide additional information which will support all of New Zealand in understanding and responding to coastal hazards and sea level rise. What is clear is that given the uncertainties regarding sea level rise and the magnitude and rate at which it will occur, our adaptation planning response needs to be flexible. Officers welcome further guidance from MfE in the coming weeks and months which will be used to inform and update our long term adaptation planning work programme.
- 10.30 **Whether the MCA has assessed reverse sensitivity or land use compatibility? –** Criterion 10 relates to reverse sensitivity and human health effects, so it assesses both.

### Options

- 10.31 The options open to the FDS Subcommittee are:
- 10.31.1 Option 1: Retain the MCA unchanged in the FDS
  - 10.31.2 Option 2: Amend specific criteria within the MCA and reassess all 209 sites (draft sites and new sites) against those criteria.
- 10.32 The MCA was workshopped with both Councils in advance of assessing the sites for their suitability for future development. The MCA has been reviewed by Sense Partners (see attachment 4 "Analysis report for deliberations" and its appendices which include the Sense Partners report) and is found to be consistent with approaches taken at other councils. Sense Partners find it to be transparent and applauds the weighting afforded to public and active transport mode access. In fact, the MCA for the FDS places higher weighting on this criterion than other MCA criteria used by other councils (eg Wellington and Rotorua Lakes).

### Officers' recommendations

- 10.33 Officers recommend no changes to the MCA used for the FDS. It is considered to be a sound framework and has enabled assessment of a very large number of sites.

## 11 Theme 5 Greenhouse gas emissions reduction

### Issues raised in submissions

- 11.1 Outcome 1 of the draft FDS focused on urban form reducing greenhouse gas (GHG) emissions. 66% of respondents to this question strongly agreed or agreed with this outcome, with approximately:
- 11.1.1 68 submitters of the 345 (20%) that answered this question considered this outcome should be the core driver of the FDS
  - 11.1.2 52 submitters (15%) were concerned about how the FDS will achieve this given the proportion of greenfield growth
- 11.2 Comments were received on GHG emissions in relation to many other parts of the draft FDS survey including:
- 11.2.1 outcome 2 on consolidation and intensification of Nelson and Richmond
  - 11.2.2 outcome 3 on accessibility of new housing to jobs, services and amenities
  - 11.2.3 outcome 8 on climate change, where emissions reduction was raised as the most important thing to achieve this by 11 submitters and 12 submitters considered the FDS is not doing enough to adapt to the impacts of climate change, which included increasing vehicle travel by providing for greenfield expansion of housing
  - 11.2.4 question 12 which sought other comments in relation to the FDS outcomes, where 40 submitters considered the FDS is not working towards a reduction in GHG emissions
  - 11.2.5 question 13 which sought views on the core part of the proposal – of those 152 submitters (60% of respondents for this question) that did not support the core part of the proposal, a significant number raised the issue of greenfield expansion in the FDS, the impact this will have on car dependency, traffic and GHG emissions
  - 11.2.6 question 31 which sought views on the secondary part of the proposal – of those 53% of submitters who did not support the secondary part of the proposal, key concerns were distance of the growth areas from existing centres and employment and resultant increase in GHG emissions
  - 11.2.7 questions 15-21 on intensification in specific areas – a key theme in support for consolidating Nelson, Stoke and Richmond to support intensification was to reduce GHG emissions
  - 11.2.8 questions 18 and 19 on intensification in Brightwater and Wakefield, of those submitters who disagreed with this proposal, a significant number cited lack of employment here which would result in increased GHG emissions from travel to other areas
  - 11.2.9 question 21 on intensification in Māpua – of the 42% that disagreed with this proposal, a significant number cited lack of jobs in the area and growth will exacerbate car dependence and GHG emissions
  - 11.2.10 a significant proportion of submitters were concerned over the impacts of proposed greenfield expansion in the FDS in specific towns due to increased GHG emissions, including Nelson, Stoke, Richmond, Brightwater, Wakefield, Motueka, Māpua.
- 11.3 Submitter 31655 (Waka Kotahi) notes in its submission that *“the subsequent processes to enable growth (e.g. Plan Changes) should provide information on how greenhouse gas*

*emissions could be reduced by enabling active mode and public transport links that provide legitimate transport choice for all people. Waka Kotahi request that they work with the FDS team and local councils in the carbon modelling space – this will be particularly important when the Waka Kotahi Emission Reduction Plan is finalised in the next few months. Integration with existing networks, and the required infrastructure improvements need to be assessed in line with the Toitū Te Taiao framework: Avoid, Shift, Improve.”*

### **Officers' comments**

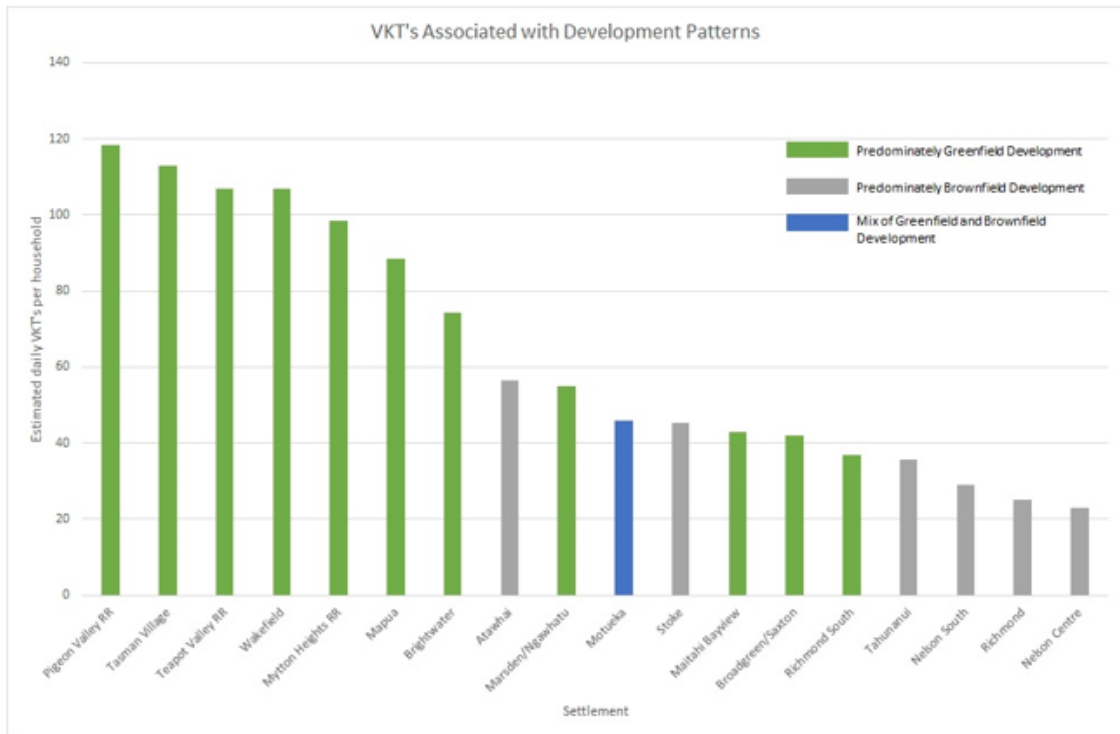
- 11.4 The NPS UD requires councils such as Nelson and Tasman to provide sufficient housing and business land to meet demand at all times, over the 30 year period (policy 2). Objective 1 of the NPS UD is for New Zealand to have well functioning urban environments and policy 1 explains urban environments as a minimum (amongst other things) have good accessibility for all people between housing, jobs, community services etc. and support reductions in greenhouse gas emissions. Policy 6 requires decision makers, when making planning decisions to have regard to the benefits of urban development being consistent with well functioning urban environments. One of the purposes of an FDS is to achieve well functioning urban environments in its existing and future urban areas.
- 11.5 The NPS UD focuses on urban environments which are areas of land that are or are intended to be predominantly urban in character and are or are intended to be part of a housing and labour market of at least 10,000 people. An urban environment can be a non-contiguous area of urban land – so long as they are part of the same housing and labour market.
- 11.6 Following this clarification the Joint Committee of the Nelson City and Tasman District Councils agreed in November 2020 that the urban environment in the Nelson Tasman Tier 2 would comprise Nelson, Cable Bay, Hira, Richmond, Motueka, Māpua, Wakefield and Brightwater. There are many towns in Tasman not included in the urban environment because they do not meet the criteria above, including Tākaka, Tapawera, Murchison, St Arnaud, Collingwood.
- 11.7 As well as the NPS UD, the FDS has to comply with other National Policy Statements and sometimes these are conflicting in their objectives. The draft FDS attempts to balance the requirements of all these directives, including reducing GHG emissions. The weighting of the accessibility criterion of potential development sites to public and active transport by a factor of 5 (discussed in the previous section), is due to the acknowledged importance of accessibility in contributing to reducing GHG emissions. It should be noted that intensification of housing does not mean no GHG emissions, all development will increase GHG emissions. Generally, inhabitants of intensive housing will still use their private vehicles, some more than others and deliveries will be made by commercial vehicles.
- 11.8 Conclusions on GHG emissions can also not automatically be jumped to according to the physical location of an area. For example, according to census travel to work and school data, 51% of people who live in Māpua that travel for work or school, do it within Māpua. The same figure for Motueka is 70%. Despite its distance from Nelson and Richmond, Māpua and Motueka have better (lower) transport GHG emissions than Wakefield. They are however higher than intensification of existing urban areas within Nelson, Richmond and Motueka. An increased residential population within Māpua or Motueka also has the potential to help better support local services and employment opportunities, reducing the need to travel outside of the town for day-to-day living.

- 11.9 The core part of the proposal (growth focused mainly along SH6) prioritises intensification as much as it can close to existing and proposed public and active transport, while being realistic about how much housing the local market can deliver.
- 11.10 The accessibility mapping undertaken for the draft FDS and subsequent scoring under the MCA has been the primary tool for evaluating greenhouse gas emissions to date. Theme 4 above and attachment 4 “Analysis attachment” by Barkers both provide more details on this.
- 11.11 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.
- 11.12 As Waka Kotahi notes, the next step in the implementation process, the Plan Changes should provide information on how greenhouse gas emissions could be reduced by enabling active mode and public transport links that provide legitimate transport choice for all people. The Waka Kotahi Emission Reduction Plan is due to be finalised in the next few months. The timing of this is not helpful for the FDS. No other Councils or Government agencies have a methodology in place to measure future GHG emissions from transport.
- 11.13 That said, officers at Tasman District Council have undertaken their own household transport emissions analysis, in the absence of direction from Central Government. This type of analysis is relatively new to New Zealand and officers have had to develop this from first principles rather than utilising a tested methodology.
- 11.14 Officers have 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 model is based on Hikina te Kohupara Transport Emissions: Pathway to Net Zero by 2050, a Ministry of Transport discussion document which Central Government is going to base its emissions reduction plan on. The fourth pathway from this document has been relied upon, as the basis for what transport will look like in the future, (eg in terms of uptake of electric vehicles, public transport and walking/cycling), which complies with the Climate Change Commission’s directions. Assumptions on this analysis are set out in Attachment 5 “Greenhouse gas emissions modelling memo.”
- 11.15 Officers have looked into the likely distances people need to travel from dwellings in different areas based on the 2018 travel to work and school census data. (Freight movements have not been assessed.) The figure below shows that development in the Nelson/Richmond areas have the smallest Vehicle Kilometres Travelled (VKT) out of any of the settlement areas. Figure 2 below shows that rural residential and greenfield development a long way from Nelson/Richmond produces the most VKT’s due to a high proportion of residents travelling to work or school in Nelson/Richmond. 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 for example in Riwaka or Lower Moutere. This shows that developments within (or very close to) Nelson/Richmond urban area (intensification and greenfield) or Motueka will produce the least VKT’s and therefore the least GHG emissions.



11.16 A large proportion of the submissions raised the issue of the FDS growth areas in the Maitai Valley requiring too much use of private motor vehicles and effect this would have on GHG emissions. From the graph below, it is clear that, of the greenfield sites, those located in the Maitai Valley are amongst the best locations regardless of whether they are greenfield or intensification sites.

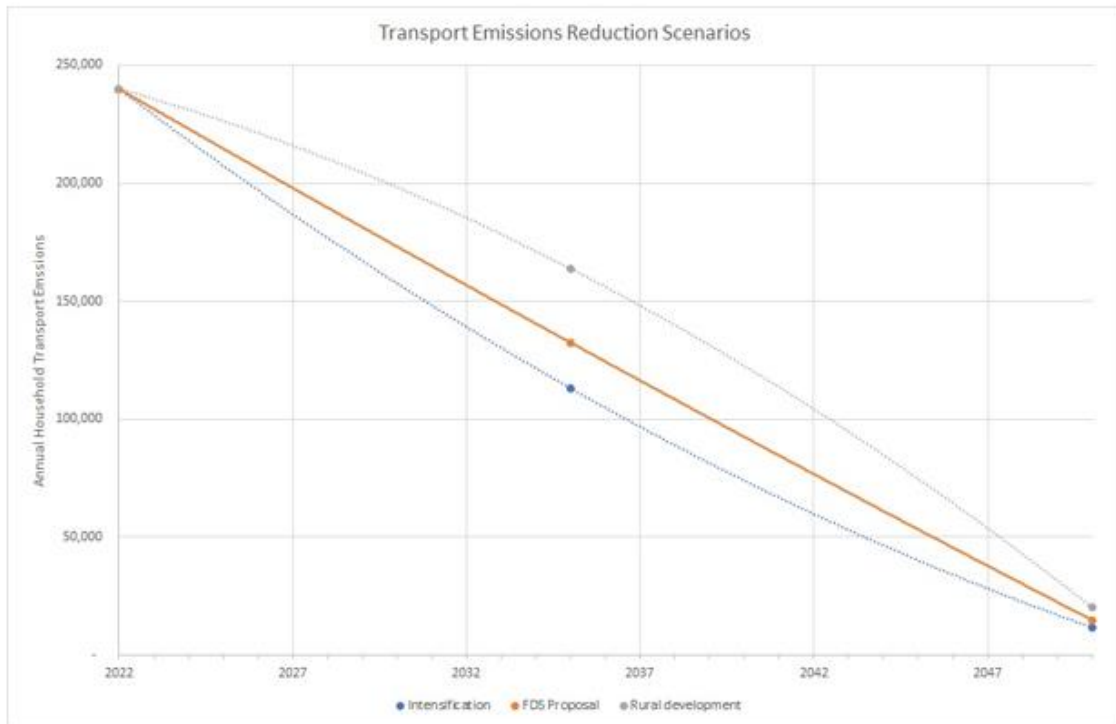
**Figure 2 VKT's associated with development patterns**



11.17 Next, officers have also used the travel patterns from the VKT analysis and combined it with future transport changes and the residential growth in the draft FDS to model transport emissions in 2035 and 2050 as shown in Figure 3 below. Officers have modelled three different scenarios for future transport emissions:

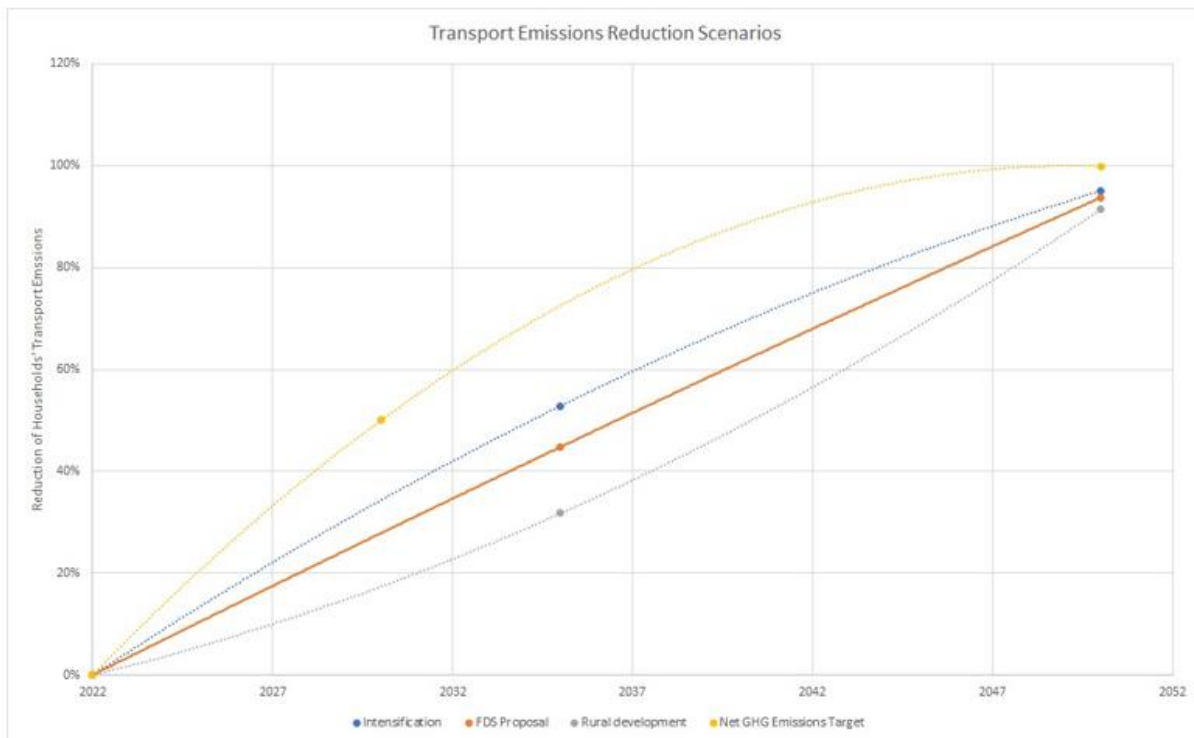
- 11.17.1 to meet demand for the high growth scenario within the urban environment (24,000 dwellings), the Councils will provide all capacity by intensification and greenfield expansion as set out in the core part of the proposal in the draft FDS (so excluding the new community near Tasman Village and Lower Moutere);
- 11.17.2 to meet demand for the high growth scenario within the urban environment the Councils will provide all capacity by intensification only (with a couple of intensive greenfield sites that have low VKTs, near to centres, needed to meet demand); and
- 11.17.3 to meet demand for the high growth scenario within the urban environment the Councils will provide all capacity by rural development only (e.g. within 25km from Richmond, in a location such as the secondary proposal near Tasman village, as a new town).

**Figure 3 Transport Emissions Reduction Scenarios**



11.18 Officers have also compared the modelled GHG emissions against the GHG emission reduction targets shown in figure 4 below.

**Figure 4 Transport Emissions Reduction Scenarios**



11.19 The figure 3 above shows that all scenarios show significant reductions in transport emissions, however there is a considerable variation in the emissions in 2035. 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.

- 11.20 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 4 the FDS proposal is close to the intensification scenario, but both the proposed FDS and the intensification scenario are under the GHG emissions target and this is assuming an unrealistic uptake rate of 45% for intensification, in the intensification only scenario. To achieve the transport emission targets, emissions will need to be offset by planting around 3.1 million pine trees by 2030.
- 11.21 On 16 May 2022 the Government’s first Emissions Reduction Plan was launched, the plan contains strategies, policies and actions for achieving the Government’s first emissions budget and contributing to global efforts to limit global temperature rise to 1.5 degrees Celsius above pre-industrial levels. Chapter 7 of the plan looks at planning and infrastructure and how that can reduce emissions. The plan supports more mixed use, medium and high density development close to urban centres, creating more accessible, healthy, resilient and vibrant towns and cities (page 129). Action 7.2 of the plan refers to the NPS UD and how that requires intensification in and around urban centres. Action 7.4 includes improving the evidence base for understanding what can help reduce urban greenhouse gas emissions e.g how land use planning and delivering infrastructure in our urban areas can reduce emissions. Finally, action 7.4 is to assess the extent to which existing urban development and infrastructure policy programmes (e.g. NPS UD) are aligned with emissions-reduction goals.
- 11.22 Chapter 10 of the Emissions Reduction Plan considers transport. Action 10.1.2 is to set sub-national VKT reduction targets for tier 1 and 2 urban environments by the end of 2022. By the end of 2024, VKT reduction programmes will be published by Central Government for tier 2 urban environments, in partnership with local government, Māori and community representatives.
- 11.23 There are some differences between assumptions of the Hikina te Kohupara Pathway 4 used in the above model and the emissions reduction plan. The assumed level of VKTs by 2035 is different: 39% and 20% respectively. The EV uptake rate is also different 27% and 30% respectively. The emissions reduction plan does not project either metric to 2050. Notably the plan also requires roadway expansion and investment in new highways to be consistent with transport targets.

## Options

11.24 The options open to the FDS Subcommittee are:

- 11.24.1 Option 1: Retain the balance of intensification and greenfield housing land as proposed in this report (for the core part of the proposal), based on the above GHG emissions analysis, in the knowledge that the assumptions in the draft FDS and the preliminary GHG emissions analysis will be reviewed many times over the 30 year period.
- 11.24.2 Option 2: Change the uptake rate for intensification which would then change the balance of greenfield and brownfield housing, to improve GHG emissions, noting that even an unrealistic uptake rate of 45% for intensification does not achieve the GHG emissions target by 2050.

- 11.24.3 Option 3: commission further GHG emission analysis, noting that Central Government's (Waka Kotahi's) Emission Reduction Plan is not available for another few months.

### Officers' recommendations

- 11.25 In assessing GHG emissions, officers recommend the core part of the proposal (consolidated growth focused largely along State Highway 6 from Atawhai to Wakefield, but also including Māpua and Motueka and meeting the needs of Tasman rural towns), with the balance of intensification and greenfield development as set out in this report under theme 6 below. This spatial strategy is realistic in its assumptions on intensification, with an uptake rate of 15%.
- 11.26 The FDS proposal (intensification and greenfield expansion) can reduce household transport emissions by 94% of current emissions by 2050. While this is not the 100% reduction needed, no scenario reaches that target, even intensification only, assuming an unrealistic uptake rate of 45%. It is important to remember that the FDS provides for a high growth scenario in both Nelson City and Tasman District, so that it plans strategically for the worst case in terms of demand for housing and business land. It is potentially unlikely that both Councils will continue to experience high population growth. Currently it is only Tasman that is experiencing high population growth and this could slow down. The Councils undertake population projections every 3 years for this reason.
- 11.27 Officers recommend that the annual FDS implementation plan considers population growth trends, housing demand and uptake of intensification. The implementation plan can then propose the proportion of intensification and greenfield areas that are enabled by rezoning and rule changes in Plan Changes across the regions. As Waka Kotahi suggests these Plan Changes will need to address how to minimise GHG emissions.
- 11.28 Officers recommend option one above.

## 12 Theme 6 - Greenfield/brownfield housing capacity split

### Issues raised in submissions

- 12.1 Questions 14 (where respondents would like to see growth over the next 30 years), question 29 (balance between intensification and greenfield for the core part of the proposal) and question 30 (proposals for a different balance) provided the following responses:
- Question 14:
- 43% wanted to see growth occurring via intensification within existing centres
  - 21% wanted to see growth in Tasman's existing rural towns
  - 16% wanted to see growth largely along the SH6 corridor as proposed
  - 8% wanted expansion into greenfield areas close to the existing urban area
- 12.2 On the balance of greenfield and intensification (question 29), only 11% of submitters agreed that the core part of the proposal had the balance right, while 70% disagreed, 12% were neutral and 6% didn't know.
- 12.3 In terms of suggestions where submitters thought the balance was not right (question 30), 50% would prefer more intensification, 34% would propose less greenfield expansion and

smaller proportions of submitters would propose less intensification (11%) and more greenfield expansion (5%).

- 12.4 In terms of specific submissions, Property Economics provided a supplementary memo for Kainga Ora’s submission. This concludes “overall the outcome of the Nelson/Tasman FDS seems to contradict its objective of consolidation. The result of the FDS is likely to be much of the same greenfield expansion with this form of development dominating future growth and providing a similar position for Council in the future to simply supply more greenfield as its proportional capacity is developed ahead of any significant level of increased consolidation in existing urban areas.”
- 12.5 Mr Fraser Colgrave provided a supplementary statement with Nelson Tasman 2050’s submission which appears to read earlier Sense Partner’s advice for Tasman District Council as saying releasing greenfield land would increase intensification across the shared urban area.

### Officers’ comments

- 12.6 There is clearly greater support for intensification. There is also a significant amount of support for growth particularly in Tasman’s existing rural towns. Support for intensification is a common response to surveys when asking the community where future growth should be accommodated. For the FDS 2019, the Councils sought the community’s views on whether they supported building up (intensification), out (greenfield) or start from scratch (new communities). There was an overwhelming response of support for intensification - 84% of respondents supported this.
- 12.7 However, when the Councils undertook a housing preferences survey of residents living in the Nelson Tasman urban environment in 2021 and asked where they themselves would like to live, the response was very different. The survey also asked residents what type of dwelling they would choose, with over 200 different options provided, using local photographs of recent housing.
- 12.8 The “Housing We’d Choose” survey found for Tasman that 71% of the 300 respondents preferred a standalone dwelling, 5% would like an apartment and 24% an attached dwelling. These choices were income constrained. While 71% is lower than some previous surveys undertaken by the Councils, it is still a very high proportion. The survey found for Nelson that 64% of the 300 respondents preferred a standalone dwelling, 8% would like an apartment and 28% an attached dwelling. It’s also worth noting that overall in the regions, 34% of respondents could not afford to buy any dwelling. 5% of these could afford a rental. The remaining 28% could not afford to buy or rent anything.
- 12.9 The results of the Housing Preferences Survey are very typical for New Zealand, although they are changing slowly. The predisposition of New Zealanders is for the single storey detached housing. Surveys nationally generally find around 80% prefer detached housing. The Wellington and Dunedin City Councils’ surveys (2014 and 2019) found that 70 – 80% of respondents prefer detached housing<sup>1</sup>. This was echoed in a survey undertaken for Nelson and Tasman Councils in 2015 by the University of Otago, which found that 80% of respondents stated detached housing as the most desirable form. The three most common reasons cited were desired privacy, garden space and outdoor space. Recent Tasman District Council customer surveys (Communitrak) have found similar percentages, (actually 91% preferred lifestyle blocks and standalone housing). This shows the challenge in New

<sup>1</sup> Wellington City Council “The Housing Viewpoints Report” 2014; Dunedin City Council “The Housing We’d Choose, Housing Framework Predictions’ 2019

Zealand for the uptake of intensification, due to lack of cultural familiarity with medium density housing, although the surveys do reflect a slow growing acceptance of medium density housing as an option.

- 12.10 The draft FDS considered a scenario of intensification only in the regions, (discussed in the technical report) but unfortunately, using realistic densities and uptake rates, this did not yield enough houses to meet the high population growth scenario. Hence greenfield sites have also been suggested as a means of satisfying the expected capacity requirements. If population growth slows to a medium rate for both Councils and remains at that rate, the capacity could feasibly be provided by way of intensification rather than greenfield expansion.
- 12.11 Brownfield intensification needs to be commercially feasible and there are a number of factors that contribute to this 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, potential for notification of the proposal, average sale prices in a location. The areas selected for intensification in the draft FDS have been reviewed by Sense Partners, (see attachment 4 “analysis report” by Barker and Associates and its appendices including Sense Partner’s memo) and it cannot identify large sites that are not already included.
- 12.12 Not every brownfield site is feasible for intensification. There are certain criteria that need to exist generally to make a site suitable, including distance from a city centre, land value and capital value ratio, topography, age of existing housing on site, amenities nearby, public and active transport accessibility, amenity space nearby and infrastructure servicing availability. Submitter Kāinga Ora included some maps within its submission, showing a walking catchment from centres within the regions and suggested all the land included was suitable for intensification. This analysis failed to take any of the above factors into account and as a result is unrealistic. Sites included were schools, housing just constructed recently including a retirement village, and reserves including Jubilee Park.
- 12.13 Sense Partners has provided advice to Tasman District Council on the implications of greenfield housing supply on intensification uptake previously (“Understanding the impacts of releasing greenfield sites for development” 2019) and their more recent advice is consistent with the earlier advice. Dr Kirdan Lees states “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.”
- 12.14 Objective 2 of the NPS UD states “Planning decisions improve housing affordability by supporting competitive land and development markets”. As Dr Lees suggests, 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 greenfield land reduces the cost of land, reduces the cost of housing predominantly by increasing the supply of housing in greenfield areas within the regions. 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.
- 12.15 In relation to Kāinga Ora’s submission (Property Economics), Dr Kirdan Lees finds they miss this point.
- 12.16 As the Sense partners report outlines, using Central Government’s Urban Development dashboard, one of the indicators monitored is the ‘price cost ratio’ – the price of housing

relative to the cost of constructing new houses ie the cost of land. Where this ratio is 1.5, the cost of a section comprises one third of the house price. 1.5 is therefore used as a benchmark.

- 12.17 This ratio has been rising in recent years for Nelson and Tasman combined. In 2014 the ratio was 1.3. Today it is 1.75. Dr Lees comments this is a signal that land is undersupplied across the regions and suggests a stressed market.
- 12.18 In terms of Mr Colgrave's memo for the Nelson Tasman 2050 submission, Dr Lees disagrees with his interpretation of the earlier Sense Partners report – that releasing greenfield 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 greenfield land. Instead, some new development will lead to intensification of specific brownfields sites over time. Not all the greenfield sites in the draft FDS will be released at once, or possibly even at all. Demand will be regularly monitored and sites zoned and serviced in a staged manner, as currently occurs.
- 12.19 Dr Lees' report also considers the historic rate of growth in urban land for NZ regions 1996-2018 and compares these rates to the rates implied by the FDS. His analysis shows that the implied growth in urban land is much lower in Tasman than has been the case historically. 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 district 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 than over this earlier period.
- 12.20 The draft FDS did not set out to secure a particular greenfield/intensification split. The final greenfield/intensification split was rather the final result after the rest of the process of scoring sites, choosing a spatial scenario and maximising intensification first.
- 12.21 Policy 1 of the NPS UD seeks to enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households. Clause 3.2 of the NPS UD requires sufficient development capacity for housing. 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.
- 12.22 As a result of submissions and some reworking of the capacity provided for housing (see attachment 4 "Analysis report" and its appendices on revised capacity calculations), the intensification/greenfield housing split in the draft FDS across the regions is as follows:
- 12.22.1 46% intensification, 54% greenfield. This approximate 50-50- split for the regions as a whole is comparable to other cities in New Zealand, including Wellington and Hamilton for example. The split reflects the officers' views as to what the market might realistically and reasonably be estimated to deliver at this point in time (save for any drastic and unanticipated changes to current market conditions); or put another way -
- 12.22.2 67% intensification, infill and development of vacant greenfield zoned residential sites (representing an increase from 63% in the draft FDS); 27% new managed greenfield sites not yet zoned; and 6% rural residential sites not yet zoned. This reporting is slightly different to the draft FDS, as greenfield sites already zoned

were not distinguished from unzoned greenfield sites. It is worth noting that the 67%-33% split compares favourably with the Auckland Spatial Plan 2048 where the equivalent split was for 62% of growth in the existing urban area, 32% via new greenfield development and 6% via rural residential.

12.23 Split out by each Council area, the figures are as follows:

12.23.1 Nelson would 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.

12.23.2 In comparison, Tasman would 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.

### Options

12.24 There are no specific options available in this section as forcing a change to the split between greenfield development and intensification would invalidate the rest of the analysis that led to the final calculation of the split. Officers did not start with any predetermined split. Rather as much intensification as is realistically possible was sought first and then greenfield was next examined to meet total demand. If the Subcommittee wishes to change the split in some way it will need to consider the options available in the other stages of the FDS such as uptake rate, or suggest new sites for intensification. This has already been suggested above as an option for theme 5.

### Officers' recommendations

12.25 Officers recommend that should the Subcommittee wish to change the split between greenfield development and intensification, choosing an option such as to change the uptake rate is the most valid way to achieve this.

12.26 Officers recommend to retain the greenfield/intensification split as set out in this report, as this is based on sound analysis.

## 13 Theme – 7 Proposal for a new community near Tasman village

### Issues raised in submissions

13.1 53%, (176) of the 325 submitters did not support the secondary part of the proposal including three sites near Tasman Village and Lower Moutere. 12% (41 people) supported the proposal. 8% (27 people) supported the proposal provided agreement could be reached with Te Ātiawa. 25% (81 people) did not know. Key points of concern included:

13.1.1 general opposition to greenfield growth and in particular in Tasman Village due to its location away from existing centres and difficulty to service with public transport with resultant increases in vehicle use and GHG emissions;

13.1.2 loss of highly productive land;

13.1.3 concern about the capacity of infrastructure, including social infrastructure such as schools and medical centres in the wider Māpua area and the cost of upgrading or creating new infrastructure to service the amount of growth proposed;

13.1.4 concern that the inclusion of the proposal is only in response to developer/landowner willingness;



- 13.1.5 the impact on the landscape values, rural character and geographical features of the wider area including the Moutere Hills;
- 13.1.6 the proposal is not required to meet population growth;
- 13.1.7 submitters expressed particular concern about site T-136 Braeburn Road, Lower Moutere for reasons similar to those above.
- 13.2 The draft FDS noted throughout the documentation that Te Ātiawa raised significant concerns over three Tasman sites which would comprise the majority of any new development there. The nature of the concerns is a long history of spiritual/cultural issues associated with an area of battle and it being a very sensitive area. Meetings with Te Ātiawa were held between officers and Tasman elected members to discuss these concerns. The decision was made to include the sites in the secondary part of the proposal during the consultation process to obtain views of the wider community. Good-faith dialogue with Te Ātiawa continued at the same time, with a view to finding out whether a solution could be achieved which benefits all parties and takes into consideration the cultural sensitivities Te Ātiawa raised.
- 13.3 During consultation, Tasman District Council received further confirmation from Te Ātiawa that Te Ātiawa o te Waka a Māui Trust ('Trust') supports earlier feedback provided by its Kaitiaki o Te Taiao Team, in relation to all the draft FDS sites. This therefore means earlier feedback on the three sites near Tasman village (T-166, T-167 and T-168) and two sites in Māpua stands (T-124 Aranui Road and T-125 Mapua Drive/Seaton Valley Road).
- 13.4 It is important to note also that during the draft FDS hui with iwi (January 2022), Ngāti Tama ki Te Waipounamu Trust raised issues with this secondary part of the proposal concerning bringing water from a different catchment and the importance of this principle being understood in the processes that follow the FDS e.g. LTP and Tasman Environment Plan. Manawhenua Ki Mohua raised similar issues in its general response on the draft FDS – "Where does this wai come from and what infrastructure will be required to supply water?"
- 13.5 There was also opposition to the secondary part of the proposal from iwi organisations who submitted. Submission #31700 from Wakatu Incorporation and Ngāti Rārua Ātiawa Iwi Trust noted concerns regarding the new community near Tasman with respect to servicing, including water supply and transfer of water between catchments and associated cultural and environmental impacts.

#### **Officers' comments**

- 13.6 Significant legal obligations exist for councils in relation to Māori interests when working through the RMA, National Policy Statement and Local Government Act (LGA) processes. These include:
- 13.7 Sections 6, 7 & 8 of the RMA – the relationship of Māori with the environment is a matter of national importance; the need to have particular regard to kaitiakitanga; the need to take into account the principles of Te Tiriti o Waitangi
- 13.8 Objective 5 NPS UD – FDSs must take into account the principles of Te Tiriti o Waitangi
- 13.9 Policy 9 NPS UD – Local Authorities must involve hapū and iwi in the preparation of FDSs and take into account the values and aspirations of hapū and iwi for urban development
- 13.10 Clause 3.13, 3.14 and 3.15 NPS UD – specifically in relation to preparation of an FDS – the need for an FDS to have a clear statement of hapū and iwi values and aspirations for urban development; the FDS must be informed by Māori and tangata whenua values and

aspirations for urban development and feedback from engagement with hapū and iwi; in preparing an FDS local authorities must engage with relevant hapū and iwi

- 13.11 Section 4 LGA – for the Crown to take appropriate account of the principles of Te Tiriti o Waitangi and to maintain and improve opportunities for Māori to contribute to local government decision-making processes
- 13.12 Sections 81 and 82 LGA – Local Authorities must provide opportunities to Māori to contribute to decision-making processes and must ensure that they have in place processes for consulting with Māori
- 13.13 Section 77 (1) LGA – If any of the options for achievement of the objective and of a decision involves a significant decision in relation to land or a body of water, Local Authorities, in the course of the decision-making process must take into account the relationship of Māori and their culture and traditions with their ancestral land, water, sites, waahi tapu, valued flora and fauna and other taonga
- 13.14 The NPS UD contains legal obligations when preparing an FDS to include a clear statement of hapū and iwi values and aspirations for urban development; and that an FDS must be informed by Māori and in particular tangata whenua, values and aspirations for urban development and feedback from engagement with relevant hapū and iwi.
- 13.15 Since consulting on the draft FDS, discussions have taken place between the Mayor of Tasman District Council and the Chair of Te Ātiawa and the interim CEO of Te Ātiawa. These discussions have resulted in Te Ātiawa confirming their previous advice in relation to these sites near Tasman village.
- 13.16 It is important to appropriately consider and weigh these Māori considerations in this decision making process for the FDS.
- 13.17 Engagement with iwi did not reveal the same concerns for site T-136 (Braeburn Road). There have been a further three new sites proposed in the vicinity of T-136 through submissions (sites T-201 (Chisolm Land Tasman view Rd, T-202 Hayden Payne land, Tasman View Road and nearby Moana Orchard land T-203.) A further nearby site was also put forward through submissions, but it had already been assessed as part of the draft FDS, site T-180, 43 Flett Rd and discounted due to highly productive land. These new sites have been assessed using the MCA and two of them comprise significant loss of Land Use Classification 3 land, which means they would not be progressed as this is a score of 1 and a 'no-go' constraint (sites T-201 and T-203). Details of these new sites have been provided to iwi and their feedback is awaited.
- 13.18 Assuming iwi do not raise concerns of cultural significance over these sites, site T-202 (Hayden Payne land, Tasman View Rd) and site T-136 (Braeburn Rd) remain. While they adjoin each other, estimated yield from these sites is 1,500 dwellings. Neither site has scored well, ranking 162<sup>nd</sup> and 172<sup>nd</sup> out of 209 sites. These two sites do not align with the preferred growth pattern of the core part of the proposal.
- 13.19 While these two sites would potentially provide a resilient option for residents wishing to live in Motueka in the future, the servicing costs for these two sites alone are substantial. The efficiency of servicing these two sites is much less than if Council was investing in servicing of the larger number of sites in the area i.e. more houses could be provided at a lower cost per house. These sites are not needed in order to provide capacity to meet identified housing demands over the next 30 years.

## Options

- 13.20 Option 1 – Exclude all the sites near Tasman village and Braeburn Road, Lower Moutere from the draft FDS, as well as new site T-202 (Hayden-Payne land Tasman View Rd) proposed through submissions in Lower Moutere.
- 13.21 Option 2 – Include the sites near Tasman village (T-166, T-167 and T-168) and Braeburn Road, Lower Moutere (T-136) in the draft FDS, as a core part of the proposal.
- 13.22 Option 3 – Exclude the sites near Tasman village but include the sites at Lower Moutere (T-136, and T-202, Hayden-Payne land, Tasman View Road).
- 13.23 Option 4 – Include the sites near Tasman village (T-166, T-167 and T-168) but exclude the sites at Lower Moutere (T-136 and T-202).

### **Officers' recommendations**

- 13.24 Officers recommend option 1. As stated in the draft FDS the three sites near Tasman village and the site in Lower Moutere (as well as other sites proposed in Lower Moutere through submissions), are not needed in order to meet housing demand, in the high growth scenario.
- 13.25 To include sites T-136 and T-202 only (which have scored better in the MCA and do not comprise highly productive land) would entail high servicing costs for a relatively low yield of dwellings.
- 13.26 Officers do not recommend including the sites near Tasman village and this has been considered fully under theme 7 above.
- 13.27 Given the size of the proposal has reduced from what was originally considered (originally including sites T-166, T-167 and T-168), there would also be less scope to ensure viable employment land opportunities are provided here which may also lead to increased VKTs, as residential travel to nearby towns for employment and school.

## **14 Theme 8 - Site specific matters**

### **Issues raised in submissions**

- 14.1 Site specific matters were raised in a large number of submissions. Where a particular site attracted a significant amount of comments by submitters (directly or indirectly), these comprise:
- 14.1.1 Maitai Valley (sites N-106 Maitahi Bayview (Private Plan Change 28 site) and N-32 Orchard Flats);
  - 14.1.2 Tahunanui (covered under theme 11 – natural hazards);
  - 14.1.3 Site T-163 42 Keoghan Road, Tākaka;
  - 14.1.4 Light industrial sites in Brightwater and Wakefield on highly productive land (T-105 and T-108) (indirect comments);
  - 14.1.5 Submissions on the sites near Tasman village and in Lower Moutere (Braeburn Road) (dealt with above under theme 7);
  - 14.1.6 Opportunities for the rural towns of Murchison and Tākaka (few comments in any number but the Statement of Proposal sought responses on these sites);
  - 14.1.7 Landowners opposing inclusion of their site in the draft FDS; and
  - 14.1.8 Horoirangi, Nelson.

*Maitai Valley (sites N-106 Maitahi Bayview (Private Plan Change 28 site) and N-32 Orchard Flats)*

14.2 A large proportion of submitters raised their opposition to the two areas shown in the Maitai Valley in the draft FDS. The reasons given for opposition include:

- loss of amenity for recreational users of the Maitai Valley;
- environmental effects on the Maitai river as a result of additional contaminated stormwater run-off;
- loss of amenity for neighbouring properties;
- increase in traffic on Maitai Valley Road and Nile Street.

*Site T-163 42 Keoghan Road, Tākaka*

14.3 10 submitters oppose the development of this site for rural residential housing and 1 submitter supports this site. Reasons for opposing it include:

- the site overall contains wetlands;
- the site falls wholly within the Coastal Environment;
- the site falls within the outstanding Natural landscape;
- noise impact from the Tākaka-Puramahoi aerodrome runway;
- exceptional birdlife in the estuary and wetland and indigenous biodiversity value;
- lack of safe active transport access to town;
- key concern is loss of former wetland areas which could be restored in the future. There may well be a compromise protecting remaining and former wetland areas. Rangiheata headland and surrounding area is of significance to MKM and other iwi (Manawhenua Ki Mohua).

*Light industrial sites in Brightwater and Wakefield on highly productive land*

14.4 The FDS questionnaire (question 32) asked for feedback on the locations shown for business growth and the summary of the advantages and disadvantages of the core part of the proposal (page 12 summary document), highlighted that it included proposals for light industrial land in Brightwater and Wakefield on highly productive land. The vast majority of responses to this question do not specifically mention the Brightwater and Wakefield business sites.

14.5 17% of respondents agreed with the locations generally shown in the draft FDS for business purposes. 23% disagreed with the locations generally. 34% responded with neutral and 25% did not know. 6 submitters specifically mentioned concern generally over business growth expanding onto highly productive land.

14.6 On a related question (question 25) about support or otherwise for greenfield housing expansion in Brightwater, 93 submitters who disagreed with the proposed greenfield residential sites in Brightwater did so because of resulting increase in GHG emissions given the lack of employment options in Brightwater. On another related question (question 26) about support or otherwise for greenfield housing expansion in Wakefield, 73 submitters who disagreed with the proposed greenfield residential sites in Wakefield, did so, because of lack of jobs in the area and resultant GHG emissions.

*Growth opportunities for the rural towns of Murchison and Tākaka*

14.7 Section 7.2 of the draft FDS (page 30) explains that the FDS provides a range of opportunities for consideration in Murchison, Tapawera, St Arnaud and in Golden Bay and

that not all the sites identified are needed. Questions 34-39 of the questionnaire sought feedback on the proposed residential and business sites in these areas. Responses to sites in these towns have therefore been considered.

- 14.8 With the exception of site T-163 (covered above), numbers of submitters making comments about specific sites in the rural towns of Tasman, including Murchison and Tākaka are very low. Single or a couple of respondents have indicated support or opposition for different sites.
- 14.9 However, more generally, as discussed above under theme 6, 21% of respondents to question 14 (“where would you like to see growth happening in the next 30 years?”) supported growth in Tasman’s rural towns.

*Landowner responses on sites being included in the draft FDS*

- 14.10 Before the Special Consultative Procedure commenced on March 14th, landowners of a draft site proposed in the FDS received a letter explaining the consultation process to them and inviting feedback on the proposal and whether they supported the inclusion of their land or not. Consequently, Tasman District Council received three submissions where the landowners did not support the inclusion of their site. These are:
- 75 Jeffries Rd (a small southern portion of site T-01, east of Jeffries Rd) Brightwater– residential;
  - Site T-003 (Shanee Hills, although the landowner suggests this should have been called “Waimea Plains View” after the farm (adjoins 75 Jeffries Rd) – residential;
  - Site T-048, Rototai Road, Tākaka – residential

*Hohoirangi, Nelson*

- 14.11 A submission was received from Wakatu Incorporated specifically on the Hohoirangi site that they are proposing to develop within the wider Wakapuaka area.

**Officers’ comments**

*Site N-106 Maitahi Bayview (PPC28)*

- 14.12 Maitai Valley sites - Loss of amenity for neighbours and recreational users and noise from new housing are matters for consideration as part of a Plan Change process.
- 14.13 The potential environmental effects of stormwater run-off will be an issue for any developer of the site to deal with in a resource consent application and plan change.
- 14.14 Likewise, the increased traffic on Maitai Valley Road and Nile Street is an issue for a resource consent application or plan change.
- 14.15 The area N-106 Maitahi Bayview (PPC28) is currently the subject of a private plan change application (PPC28). The RMA does not require consideration of the FDS 2022 when making a decision on PPC28, however PPC28 must give effect to the NPS UD. Accordingly by virtue of giving effect to the NPS UD the “relevant FDS” is something which must be had regard to in PPC28. This does not elevate the FDS to the level of the higher order documents which must be given effect to, but rather it makes the FDS a relevant consideration to be taken into account. The NPS UD must be “given effect to” (ie a much stronger direction than “having regard to”).
- 14.16 Policy 8 of the NPS UD states that “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”

- 14.17 PPC28 would need to be assessed under this policy regardless of whether it was included in the FDS or not as it would be considered “out-of-sequence with planned land release” and likely “add significantly to development capacity”. Whether PPC28 would proceed would depend on the wider assessment required by the RMA but its absence from the FDS would not in itself exclude it from going ahead.

*Site T-163 42 Keoghan Rd, Tākaka*

- 14.18 Approximately half the site is outside the mapped Coastal Environment and would not therefore be subject to the New Zealand Coastal Policy Statement policy 11 (indigenous biodiversity). The site's indigenous biodiversity values, the effect on existing wetlands including Onahau wetland, wetland management and associated concerns would be explored through any rezoning process, if the site progresses to the adopted FDS. Officers would check whether any of the values listed are within the Coastal Environment area and if so, an assessment would then be needed of whether rural residential housing may adversely affect those values. If so those parts of the site would need to be excluded.
- 14.19 The area adjoining the estuary is a wetland and is not considered appropriate for development. Some significant wetlands are on the boundary. The remainder of the site is suitable. Also noted old images show a lot of ephemeral areas and drainage channels on site. Low key development and habitat restoration as positive mitigation may be a better option than farming pastoral use. Tasman District Council officers have not done any fish monitoring here, so would rely on modelled fish data and desktop habitat assessment (eg using LIDAR); some estuary habitat mapping vegetation, substrate, macroalgae) was done by Wriggle in 2012 (now Salt Ecology). The 2012 mapping reports are on the TDC website. See Environmental monitoring reports. Click on the Appendix for “Habitat Maps Golden Bay” pages 86 and 87. The resource scientists have confirmed that if keeping T-163 allows for any chance of restoration/improvement through setting aside strategic areas to restore and rewet then they would be very supportive of this.
- 14.20 On active transport connections, the distance is not too far that cycling is not possible, 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 Tākaka and Rangihaeata. Note: This is state highway and administered by Waka Kotahi.
- 14.21 In December 2021 a noise impact assessment was undertaken by WSP for the Council for the Tākaka-Puramahoi aerodrome runway. It found in the worst-case three-month period, 1,800 aircraft movements are recorded and this number is unlikely to increase in the foreseeable future. The aerodrome operates only during daylight hours, and therefore there is a longer flying period during the summer months, and a shorter flying daytime period during the winter months. An air noise boundary and outer control boundary was used in the assessment to measure the noise impact from the runway. Neither of these boundaries overlap with site T-163. The subdivision zone for T-163 is currently closed in the Tasman Resource Management Plan but there is policy support in the current RMP for it to be reopened. The proposed rezoning did not eventuate due to lack of resources it seems.

*Light industrial sites T-105 and T-108 in Brightwater and Wakefield*

14.22 While there is a lack of responses specifically in regard to these sites under the business growth question, there are significant numbers of submitters (93 – Brightwater, 73- Wakefield), who have highlighted concern over lack of employment options in both towns, when answering the questions on greenfield housing sites here. Given their main concern is increase in GHG emissions arising from new residents living there and travelling to work, providing more employment options in these towns would seem to be a logical step in response to their concerns. According to an audit undertaken of all Tasman’s zoned business land in 2020, Brightwater has just six hectares of zoned business land available and Wakefield has three hectares available.

*Opportunities for the rural towns of Murchison and Tākaka*

14.23 Numbers of submitters making comments about specific sites in the rural towns of Tasman are very low. Single or a couple of respondents have indicated support or opposition for different sites, making it difficult to draw any conclusions about overall support or opposition to sites. There has however been significant support for growth of the Tasman rural towns in relation to question 14 of the survey.

14.24 The survey specifically sought responses to suggested sites in Murchison and Tākaka, because they provide more capacity than is needed according to our demand projections. One site in Tākaka (T-48 Rototai Road) does not have landowner support and is recommended for exclusion but the remaining sites in Tākaka and Murchison could remain. It is unlikely that all these sites will eventuate, as landowner intentions change over time and it is unlikely demand will exist for all these sites to come forward. This will be reviewed during each LTP. It is better to have more options than insufficient for future growth of these towns that are currently facing acute housing problems.

*Landowner responses on sites being included in the draft FDS*

14.25 A very small number of landowners objected to their land being included in as draft FDS sites and it is possible to remove these parts of sites or whole sites from the draft FDS without affecting overall capacity analysis (see Attachment 4 “Analysis report” and its appendices for full details of revised capacity calculations).

*Horoirangi, Nelson*

14.26 This site was assessed using the MCA and did not score well enough to proceed. In particular, the scores for efficiency of water supply infrastructure, highly productive land and sea level rise were particularly poor. It is acknowledged that development proposal from Wakatu Incorporated includes mitigation for the sea level rise component but Council officers consider that, given the poor scoring and the need to protect the integrity of the MCA process, the development is more appropriately progressed via a private plan change, rather than inclusion in the draft FDS.

**Options**

14.27 Maitai Valley (sites N-106 Maitahi Bayview (Private Plan Change 28 site) and N-32 Orchard Flats)- the options available are:

- Option 1: Keep the Maitai Valley Areas in the FDS
- Option 2: Remove the Maitai Valley areas from the FDS in response the concerns of the community.

14.28 The analysis of yield that can be expected from intensification has shown that the demand cannot be met from intensification alone. As a result, greenfield areas are needed to

supplement intensification. There is not a lot of greenfield land suitable for residential development in the Nelson area and therefore, the Maitai Valley growth areas identified in the draft FDS are needed if the NPS UD requirement that there will be the provision of “at least” sufficient development capacity over the next 30 years is going to be met.

- 14.29 The alternative to greenfield development in the Maitai Valley is increased greenfield development in Tasman which, in general, (dependent on its location), carries with it poorer environmental outcomes with respect to greenhouse gas emissions.
- 14.30 **Recommendation:** No changes to the draft FDS are recommended as a result of the issues raised by submitters on this theme. Council officers recommend option one be adopted.
- 14.31 Site T-163 42 Keoghan Road, Tākaka – the options available are:
- Option 1: Keep site T-163 in the FDS.
  - Option 2: Remove site T-163 from the FDS in response the concerns of some people in the community
- 14.32 It is the officers’ view that site T-163 could be developed taking into consideration all the concerns expressed in submissions. Not all of site T-163 is intended for development. The boundary will be drawn when the site is proposed for rezoning. Contrary to submitters’ concerns, Council’s resource scientists have confirmed that developing some of site T-163 would allow for restoration/improvement through setting aside strategic areas to restore and rewet, as opposed to leaving the site in pastoral use.
- 14.33 **Recommendation:** No changes to the draft FDS are recommended as a result of the issues raised by submitters on this theme. Council officers recommend option one be adopted.
- 14.34 Light industrial sites T-105 and T-108 in Brightwater and Wakefield – the options available are:
- Option 1: Keep sites T-105 and T-108 in the FDS.
  - Option 2: Remove sites T-105 and T-108 from the FDS
- 14.35 Retaining these sites will ensure additional employment land is provided for the two towns, which is already in short supply in this location. It will also reduce some VKTs for some future residents, contributing to reducing GHG emissions.
- 14.36 **Recommendation:** No changes to the draft FDS are recommended as a result of the issues raised by submitters on this theme. Council officers recommend option one be adopted
- 14.37 Opportunities for the rural towns of Murchison and Tākaka - the options available are:
- Option 1: Keep all the Murchison and Tākaka sites in the FDS, except site T-48 (landowner does not support).
  - Option 2: Remove certain Tākaka and Murchison sites from the FDS
- 14.38 While more capacity has been provided than is needed to meet demand in both these towns, the sites proposed in the draft FDS have been assessed against the MCA and are currently considered appropriate for future development. With the exception of site T-48 (not supported by landowner) , officers propose retaining all sites in the FDS for these towns. They will all be further evaluated at the rezoning stage and at that time some sites



may fall away. It is therefore considered appropriate to leave more sites in the draft FDS at this stage.

- 14.39 **Recommendation:** No changes to the draft FDS are recommended as a result of the issues raised by submitters on this theme, other than the exclusion of site T-48 as it is not supported by the landowner. Council officers recommend option one be adopted.
- 14.40 Landowner responses on sites being included in the draft FDS – the options available are:
- Option 1: Retain small southern portion of site T-01, east of Jeffries Road, Brightwater site T-003 Shannee Hills, Brightwater and site T-048, Rototai Road, Tākaka in the FDS;
  - Option 2: Remove small southern portion of site T-01, east of Jeffries Road, site T-003 Shannee Hills and site T-048, Rototai Road, Tākaka from the FDS.
- 14.41 The shortfall in capacity from exclusion of these sites can be found from other sources. The capacity analysis note, appended to Attachment 4 (analysis report) (page 4) provides details. Essentially the shortfall can be accommodated by an increase in zoned capacity of housing within Nelson, which was accidentally omitted from the draft FDS calculations and which was highlighted by a submitter. 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, Britannia 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.
- 14.42 **Recommendation:** Changes to the draft FDS are recommended as a result of the issues raised by submitter on this theme. Council officers recommend option two be adopted.
- 14.43 Horoirangi, Nelson – the options available are:
- Option 1 – include the site in the draft FDS
  - Option 2 – continue to exclude the site from the draft FDS
- 14.44 **Recommendation:** Officers recommend continuing to exclude this site from the draft FDS, since it did not score well enough to proceed.

## 15 Theme 9 – Implementation – Infrastructure

### Issues raised in submissions

- 15.1 The provision of infrastructure was a common issue raised in submissions to the draft FDS during the consultation. Specifically, the following matters were raised by submitters:
- 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;
  - 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;

- the draft FDS not including details of all of the new infrastructure that is needed to support the growth areas proposed.

### Officers' comments

15.2 The primary focus of the FDS is as a high level document setting out the strategy for where and how population growth will be accommodated in the regions. Four of the criteria in the MCA covering transport, water, stormwater and wastewater, dealt with the efficiency that each of the growth areas could be provided with supporting infrastructure. These criteria were scored and contributed to the overall score of each site. The provision of infrastructure in a general sense has therefore been imbedded in the FDS scoring without detailing specific parts of each network that needs to be upgraded. This approach allows the document to remain a high level strategy that provides overall direction to the following infrastructure related documents that both Councils are required to prepare to implement the FDS:

- Infrastructure Strategy
- Asset/Activity Management Plans
- Long Term Plan
- Development Contributions Policy
- Resource Management Plans

15.3 These additional documents are where both Councils are required to further evaluate the FDS sites and assess the detailed infrastructure requirements to cater for growth including how they will be staged and funded in the LTPs' Development Contributions policies are then adjusted to enable the funds to be collected to service these sites. Inclusion of detailed infrastructure funding and staging would have the effect of essentially predetermining the outcomes within these documents.

15.4 Submitters have raised the issue of infrastructure costs associated with greenfield development. In the submissions received it was stated that the cost to service greenfield land is much higher than to service intensification. In the experience of Council officers, this is correct on a 'by area' basis but when the costs are examined on a per dwelling basis this is no longer the case. This relates to the efficiency that greenfield development has in its favour, in that it has the opportunity to develop more dwellings in the same area. In the case of intensification, the development is expected to take place over a much longer time scale, often in excess of Council's legal ability to collect development contributions. This results in cost to Council (and by extension ratepayers), as the full cost of growth related infrastructure is not able to be collected without increasing the development contributions to an unreasonable level for those developments that occur in the period that development contributions can be collected. In contrast, greenfield development typically happens at a rate that ensures that, while the overall cost is high, the cost per household is low.

### Options

15.5 The Subcommittee has the following options available:

- Option 1: Adopt the draft FDS approach of not including detailed infrastructure information.
- Option 2: Include full infrastructure information.
- Option 3: Include partial infrastructure information.

- 15.6 The NPS UD requires FDSs to spatially identify the development infrastructure required to support or service that development capacity, along with the general location of the corridors and other sites to provide it. This is what the draft FDS does, with the inclusion of high level trunk infrastructure plans. As suggested by the NPS UD, there are other, more appropriate council processes and documents that will detail the infrastructure needed in each of the FDS development areas in response to demand and any financial constraints at that time.

### **Officers' Recommendation**

- 15.7 No changes to the draft FDS are recommended as a result of the issues raised by submitters on this theme. Council officers recommend option one be adopted.

## **16 Theme 10 - Staging of development**

### **Issues raised in submissions**

- 16.1 A number of submitters requested that the FDS includes staging of all of the proposed growth areas. The reasons for wanting this included were:
- Residents wanting to know when intensification would affect their property
  - Other infrastructure and community asset providers (i.e. Ministry of Education, Waka Kotahi) wanting to be able to do their own capacity planning

### **Officers' comments**

- 16.2 The NPS UD no longer contains the requirement to include development sequencing in the FDS unlike the superseded NPS UDC. The NPS UD requires local authorities to now be more responsive to the market and proposals from developers, including private plan changes.
- 16.3 The risk with including staging is that the FDS document becomes outdated very quickly if for example population growth rates are higher or lower than projected or developers develop land at different rates. This occurred with the 2019 FDS where sites were sequenced by decade but some are being brought forward much earlier than planned for rezoning.
- 16.4 Likewise, developers have applied for resource consents in a different order than anticipated by the 2019 FDS which has resulted in infrastructure roll-out being required out of sync with the staging in the document. As a result, while the fundamental direction of the 2019 FDS is sound, the finer detail relating to staging of development has quickly become out of date.
- 16.5 An assessment of three other local authorities' approaches to this issue in their respective FDS documents is provided in the Attachment 4 "Analysis report for deliberations" to this report. The assessment has found that the approach varies between the three local authorities ranging from no staging to full staging being detailed in their FDS documents.
- 16.6 To mitigate the concerns of the submitters that raised this theme, there is the requirement for a range of implementation processes to follow the FDS that will have the effect of providing an indication of staging as follows:
- an FDS implementation plan will be required to be prepared following the adoption of the FDS and must be updated annually (clause 3.18 NPS UD). Infrastructure providers

(including submitters such as Ministry of Education, Waka Kotahi) have expressed an interest in being involved in formulating these plans;

- a plan change process is still required to enable the greater level of intensification that the FDS indicates in the current built urban area;
- the sites need to be serviced and this cannot occur simultaneously.

16.7 Asset/activity management plans, infrastructure strategies and LTPs will contain information on staging every three years.

16.8 Furthermore, the FDS does not contain analysis of the financial position of the Councils which is a major driver of further upfront investment in infrastructure for servicing the FDS development areas. This level of detail is reserved for the asset/activity management plans, infrastructure strategy and LTP.

16.9 One option, is to detail a set of principles in the draft FDS that will guide staging of development in the FDS implementation plan. This would provide 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. In addition, infrastructure providers could be consulted during preparation of the infrastructure plan, such as Ministry of Education, Waka Kotahi, Kāinga Ora, DHB.

### Options

16.10 The Subcommittee has the following options available:

- Option 1: Adopt the draft FDS approach of not including staging information but include further guidance within the FDS on how the implementation plan and staging within that plan should be developed.
- Option 2: Include full staging information.
- Option 3: Include partial staging information.

16.11 On balance, Council officers consider that the relevance of the FDS into the future is an important issue that needs to be prioritised as far as content of the FDS itself goes. It is recommended that as a result of the issues raised by submitters on this theme, the FDS should contain principles to guide the staging in the FDS Implementation Plan and for the process for developing the Implementation Plan, which should include infrastructure providers.

### Officers' recommendation

16.12 Council officers recommend option three be adopted.

## 17 Theme 11 – Building Height – Nelson

### Issues raised in submissions

17.1 A number of the submissions received discussed building heights in relation to the potential intensification of the Nelson urban area in particular. The range of issues raised are summarised as follows:

- restriction of sunlight to neighbouring properties and the effect this will have on mental and physical health, energy use, and property values;
- loss of current low-rise urban aesthetic;

- conflicts with previous messages from the community in Tahunanui during the consultation related to the Tahunanui Structure Plan;
- loss of views for neighbours next to hillside intensification sites.

### Officers' comments

- 17.2 It is important to note that, the building heights shown in the draft FDS maps do not make any changes to the planning rules but instead give an indication as to where further analysis is recommended as part of any plan change processes to follow.
- 17.3 The NPS UD indicates a preference for intensification where accessibility to shops, jobs, transport links and community facilities are best, or in areas where demand is greatest. If the heights used in the analysis for the FDS were to be restricted to say two storeys to limit the effect of shading for example, there would need to be the following changes:
- more greenfield area would need to be utilized for capacity; and/or;
  - more sites would need to be intensified at the lower number of storeys.
- 17.4 The NPS UD requires a focus on intensification, including multi storey development in order to maximise intensification densities. Nuances around building height for particular areas for example, will be considered not in the FDS but as part of a subsequent plan change or RMP review, or through a resource consent application.
- 17.5 There may be some limited areas where it makes sense to limit building heights such as in small, consolidated areas of historical buildings but this analysis will need to be undertaken at a plan change level rather than at the FDS stage.
- 17.6 Section 75(3) of the RMA requires that the district plan must give effect to a national policy statement including the NPS UD. This does not include the FDS 2022, which is a separate strategy required by the NPS-UD. In practice however, while the FDS is a non-statutory document, it will be used to inform RMPs including plan changes.

### Options

- 17.7 The options available to the FDS Subcommittee are:
- Option 1: Adopt the number of building storey recommendations in the draft FDS for further analysis in the plan change processes that follow.
  - Option 2: Direct Council officers to undertake minor changes to the distribution of building storeys in the draft FDS in response to specific submissions.

### Officers' recommendation

- 17.8 The FDS is a high level document that provides broad recommendations to help inform the direction of planning rules rather than getting into the detail. The number of storeys shown on the draft FDS maps have been developed with this in mind and with the anticipation that plan changes will fine-tune the building height extent of each area.
- 17.9 Care is need in modifying the areas too much as the dwelling capacity relating to intensification is directly related to the building typology in each area which include the building heights.
- 17.10 Recommendation: No changes to the draft FDS are recommended as a result of the issues raised by submitters on this theme. Council officers recommend option one be adopted.

**18 Theme 12 – Natural Hazards – Tasman, The Wood and Tahunanui, Nelson****Issues raised in submissions**

18.1 Sea level rise is the issue raised most commonly in submissions with almost all that raised it wanting to see a stronger response in the FDS. In particular, the FDS areas in The Wood and Tahunanui were called into question as they are low lying and likely to subject to inundation in the longer term.

**Officers' comment**

- 18.2 The approach taken in the draft FDS was for existing built urban areas such as The Wood and Tahunanui that were low lying, to be scored using the MCA and included as intensification areas. The rationale behind this approach was that until some form of climate change adaptation policy is adopted, the intensification potential of an area should be acknowledged as this in itself may be useful information in determining the response to sea level rise.
- 18.3 In order to make sure the FDS is not reliant on these areas to meet the capacity target, the modelled capacity of these areas was not included in the final numbers. In other words, there is additional capacity to that expressed in the FDS if these areas ended up being protected through a future sea level rise response.
- 18.4 The eventual decisions relating to adaptation to sea level rise will be made as part of the Dynamic Adaptive Policy Pathways (DAPP) process underway in Nelson. This process is expected to be completed around the time that preparation of the next FDS will begin which will allow a more final decision on the inclusion of these areas and determine whether the capacity from these areas can be included. The implementation plan that follows this FDS will need to consider the timing of when any investment in additional infrastructure should take place in relation to the outcomes of the DAPP process. To make it clearer in the FDS that this is the approach being taken, an additional overlay will be shown on the final maps.
- 18.5 There have been questions asked regarding consistency between the approaches taken for the Tasman area compared with that in the Nelson area in relation to sea level rise with there being no site subject to sea level rise included from Tasman. This difference relates to the type of development that exists in the area subject to sea level rise. In Nelson, the areas are already occupied with fully developed urban suburbs with an existing high density of valuable infrastructure. The Tasman areas have been discounted due to the increased size of the District and the availability of choice of other sites not subject to sea level rise.
- 18.6 Liquefaction in the Tahunanui area has been raised by a small number of submitters, specifically regarding the suitability of the ground to carry taller buildings. After the Christchurch earthquake of 2011 the design standards have to take into account development that may occur in areas that may be subject to liquefaction. Liquefaction has been treated in the draft FDS as an engineering issue that influences a developer's feasibility calculations rather than not including these areas as possible intensification areas.
- 18.7 Slope stability was another of the natural hazards raised by submitters. This hazard has been treated as an engineering issue in much the same way as the liquefaction issue above in the draft FDS. There are suitable engineering solutions to slope stability issues in most cases with the main effect on housing capacity being the feasibility for developers.
- 18.8 Submissions were also received from residents in the Tahunanui Slump area regarding the inclusion of that area in the broad infill overlay of all the areas outside the specific FDS growth areas. These submissions pointed out that the area was of particularly high risk of

slope failure in relation to other areas and the effects on neighbouring properties had the potential to be severe. The current Nelson Resource Management Plan limits further development above what is already subdivided. Council officers have reviewed the draft FDS with this information in mind.

### Options

18.9 The Subcommittee has the following options available:

- Option 1: Adopt the draft FDS approach to natural hazards with no changes.
- Option 2: Adopt the draft FDS approach to natural hazards but remove the Tahunanui slump area from the pink and white coloured infill area and use an overlay on the FDS maps to show the Wood and Tahunanui FDS areas are included, subject to the outcomes of the DAPP process.

### Officers' recommendation

18.10 It is recommended that the Tahunanui slump core area be removed from the pink and white infill area shown in the draft FDS document. Council officers recommend option two be adopted.

## 19 Theme 13 – Strategic areas – Port Nelson and Nelson airport

### Issues raised in submissions

19.1 Two submissions were received that raised the topics of Port Nelson and the Nelson Airport.

19.2 The submission dealing with Port Nelson suggested that it be considered for further development for residential use and mixed business use (not suggested by the Port itself). In the submitter's follow-up at the hearing, the container storage area was specifically mentioned as a location that could be better utilised so other areas of the port could be redeveloped. The submitter was concerned that the income provided to the two Councils from the port was not enough to justify it taking up such a large space so close to the city centre and on prime waterfront property.

19.3 The Nelson Airport company provided a submission asking that the FDS areas inside the 55dBA noise contour be reconsidered.

### Officers' comments

19.4 Port Nelson is an important strategic asset to the regions as it allows for the transport of goods in and out of the regions. It is not appropriate for this report to comment on financial issues associated with utilisation of the Port. There is a need to consider whether residential development around the Port will hinder the ability of the Port to operate.

19.5 Converting port land to residential use would have the effect of constraining the operation with regards to potential reverse sensitivity effects of the noise on any new residents. Noise from the Port is an issue for some existing residents.

19.6 The Port Nelson area scored poorly in the multi-criteria analysis due to reverse sensitivity effects, Te mana o te Wai, and sea level rise effects. With the scoring and ranking poor, the site is not being put up for further consideration.

19.7 On Nelson Airport's submission, given the strategic nature of the airport careful consideration needs to be given to the likely reverse sensitivity effects and how that might constrain the operation in the future.

19.8 As detailed earlier in this report, the bulk of the submissions received on the subject of development in Tahunanui were in opposition to further intensification, particularly if it resulted in taller buildings. While this on its own is not a reason to discount development in Tahunanui, the concerns raised by the airport provide further rationale for removing these areas. It is therefore recommended that the area N-102 Roto Street be removed from the FDS in its entirety and the area of N-034 Tahunanui Drive West inside the 55dBA contour be removed from the FDS.

### Options

19.9 The options available are:

- Option 1: Remove N-102 (Roto Street) and part of N-034 (Tahunanui Drive West) from the FDS.
- Option 2: Leave areas N-102 and N-034 unchanged in the FDS.

### Officers' recommendation

19.10 Recommendation: Remove N-102 and the part of N-034 inside the 55dBA airport contour from the FDS. Council officers recommend option one be adopted.

## 20 Theme 14 - New sites, sites to be removed and amended sites proposed through submissions

### Issues raised in submissions

20.1 Through submissions, a further 32 sites were proposed within Tasman (five of these were amendments to existing draft FDS sites) and a further four sites were proposed within Nelson (two of these were amendments to existing draft FDS sites). It is critical that these sites are treated in the same manner as the sites that were considered during the preparation of the draft FDS so as not to advantage or disadvantage any particular site or group of sites.

20.2 The new and amended proposed sites were all assessed against the MCA, by the same officers as previously that completed the analysis for the draft FDS. The MCA has already been covered in theme 4 above.

20.3 The sites proposed cover the full range of greenfield residential, intensification, rural residential and business sites. The new sites proposed are as follows:

- 20.3.1 N-113 – 123 Halifax Street East (residential)
- 20.3.2 N-114 – Port Nelson (residential)
- 20.3.3 N-115 – Saxton Extension (residential)
- 20.3.4 N-116 – Orphanage West Extension (residential)
- 20.3.5 T-001 amended Jeffries Rd, Brightwater (residential)
- 20.3.6 T-005 amended Wanderers Ave, Brightwater (residential)
- 20.3.7 T-42 amended Seaton Valley Rd, Māpua (residential)
- 20.3.8 T-145 - amended Page Rd, Tākaka (light industrial)
- 20.3.9 T-195 amended Massey St, St Arnaud (papakāinga)
- 20.3.10 T-196 - 880 Waiwhero Road, Motueka Valley (rural residential)
- 20.3.11 T-197 - Ellis St/Schwasas Lane, Brightwater (commercial)



- 20.3.12 T-198 – Falcon Ridge, Higgins Rd, Brightwater (rural residential)
- 20.3.13 T-199 - 4 Teapot Valley Rd, Brightwater (rural residential)
- 20.3.14 T-200 - Pigeon Valley Rd, Wakefield (rural residential)
- 20.3.15 T-201 Chisholm land Tasman View Road (residential)
- 20.3.16 T-202 Hayden-Payne Tasman View Road (residential)
- 20.3.17 T-203 Moana orchard land Tasman View Road (residential)
- 20.3.18 T-204 St Arnaud 39 Beechnest Drive (residential)
- 20.3.19 T-205 14 Waiwhero Road (rural residential)
- 20.3.20 T-206 8 Hickmott Place (Mixed use)
- 20.3.21 T-207 9 Greenwood St (Mixed use)
- 20.3.22 T-208 Glenview Rd, Tākaka (light industrial)
- 20.3.23 T-209 Marchwood Park Road, Motueka (light industrial)
- 20.3.24 T-210 394, 410, 416 Main Road Hope (residential)
- 20.3.25 T-211 Dawson Rd, Māpua (residential)
- 20.3.26 T-212 Dodson Road, Tākaka
- 20.3.27 T-213 319 Motueka Valley Highway (rural residential)
- 20.3.28 T-214 272 Golden Hills Rd (rural residential)
- 20.3.29 T-215 326 Golden Hills Rd (rural residential)
- 20.3.30 T-216 379-391 Appleby Highway and 5-11 Blackbyre Road (light industrial)
- 20.3.31 T-217 79 Main Rd Tapawera (residential)
- 20.3.32 T-218 1 Main Rd Tapawera (residential)
- 20.3.33 T-219 3177 Korere Tophouse Road (rural residential)
- 20.3.34 T-220 262 Tākaka-Collingwood Highway (rural residential)
- 20.3.35 T-221 Ligar Bay headland East (port business use)
- 20.3.36 T-222 Ligar Bay Headland West (port business use)

#### **Officers' comments**

- 20.4 Where a new site has scored as well as, or better than other previously assessed comparable sites for the FDS and it aligns with the preferred spatial scenario for the FDS (growth focused largely along SH6, in Māpua, Motueka and Tasman's rural towns), consideration has been given to its inclusion and the consequent removal of some sites in the draft FDS. This is consistent with the methodology explained above on the multi criteria analysis.
- 20.5 In addition consideration has been given to the extent which a new proposed site:
  - 20.5.1 may accord with the purposes of the draft FDS
  - 20.5.2 may accord with the intended outcomes sought by the draft FDS
  - 20.5.3 RMA considerations
  - 20.5.4 LGA considerations and

- 20.5.5 whether the changes are generally in keeping with what the community has sought through submissions.
- 20.6 Once a site was assessed against the MCA and above factors and it scored/aligned well when compared with comparable sites, the following checks were undertaken:
- 20.6.1 where the site was proposed by a submitter, not the landowner, the landowner was contacted to obtain their views on the site being proposed for future development;
- 20.6.2 surrounding landowners of the sites were contacted to obtain their views on the site being proposed for future development;
- 20.6.3 in the case of the amended sites in Tasman, where they were amended to align with Growth Plan Change boundaries, such contacts had already been made and were reviewed.
- 20.7 Details are provided below of the new sites proposed for inclusion in the draft FDS, sites proposed to be amended and site proposed to be removed.

*NCC New Sites*

- 20.8 123 Halifax Street – the addition of this property was requested by the landowner. The site scores well under the MCA assessment but is opposed by iwi on grounds of cultural heritage significance. Therefore, in accordance with the approach taken for other sites opposed by iwi, the site scores zero under this criterion and such a score is a ‘no go’ constraint. The site is not recommended for inclusion in this FDS.

*NCC extensions to sites*

- 20.9 N-115 Saxton Extension – an area approximately 18 ha to the east of N-011 has been proposed by the landowner. This site is a moderately sized extension that scores well under the MCA and is expected to yield around 162 additional dwellings.
- 20.10 A submission was received from the owners of the land in areas N-011 and N-112 in the Saxton area. The submission asked that the two areas be expanded and that N-011 include provision for light industrial development. Scoring of the additional areas show that they make a logical extension to both N-011 and N-112.
- 20.11 The part of the submission that detailed the light industrial area in N-011 was very detailed but did not contain any assessment of the need for additional land area for this type of activity in the regions and whether this location is the best or appropriate place for it. The assessments undertaken for the Nelson and Tasman HBAs indicate that there is already enough industrial land zoned and serviced (or planned to be serviced) in the regions to meet the demand for the next 30 years. Therefore, without additional assessment work to show otherwise it is not recommended to change the typology of this area. There is of course the opportunity for the submitter to undertake this additional work and submit further in future plan changes if they wish to continue to pursue this option.
- 20.12 N-116 Orphanage West Extension - an area of approximately 64 ha to the west of N-112 has been proposed by the landowner. This site is a large extension that scores well under the MCA and is expected to yield around 245 additional dwellings.
- 20.13 Surrounding landowners of the sites recommended for inclusion were contacted to obtain their views on the site being proposed for future development.

*Tasman District Council new sites*

20.14 As noted above, within the submissions a total of 27 new sites were proposed for consideration as part of the FDS in Tasman and five existing sites were proposed to be slightly amended. These sites have all been assessed using the same MCA. They range from rural residential sites, to mixed use commercial and apartments on Council owned land, to business sites (commercial and industrial), to standard serviced residential greenfield sites.

**Officers' comments**

20.15 A number of the new sites proposed score poorly when compared to existing draft FDS sites, or are knocked out by a 'no go' constraint such as highly productive land or cultural heritage significance for iwi. Some of the requested new sites are not proposed in the draft FDS since they were previously assessed and discounted at the time of the draft FDS. Other than scoring poorly, or not aligning with the outcomes of the draft FDS or preferred spatial growth scenario, other reasons for new sites not being recommended for inclusion in the draft FDS include:

- business sites which are not needed to meet demand;
- inability to service a site proposed for standard residential development due to its topography and water servicing constraints;
- reserve designation covering a site;
- site lies within an outer noise control boundary for an airstrip.

20.16 Full details of the sites assessed by officers but not recommended for inclusion in the draft FDS will be provided in the updated technical report in due course.

20.17 Of the new and amended sites sought by submissions and now proposed by officers, the following score as well as or better than comparable sites in the draft FDS and they align with the preferred spatial scenario:

20.18 New site N-115 – Saxton Extension is an extension of the existing N-011 Saxton growth area included in the draft FDS document. This area scores amongst the highest scoring greenfield areas due to its close proximity to the two main urban areas of Nelson and Richmond in the regions. There are six immediately adjacent landowners to the extension area and they all been contacted since the hearings to gauge their opinions on development of this area.

20.19 New Site N-116– Orphanage West Extension is an extension of the existing N-112 Orphanage growth area included in the draft FDS document. In a similar manner to the Saxton expansion area, this area scores amongst the highest scoring greenfield areas due to its close proximity to the two main urban areas of Nelson and Richmond in the regions. There are three immediately adjacent landowners to the extension area and they all been contacted since the hearings to gauge their opinions on development of this area.

20.20 In terms of surrounding landowner responses for sites N115 and N116, so far, responses have been received from five neighbours with four supporting the areas inclusion and one opposing. One of the neighbours to area N-115 requested that their property also be included but with the submission period finished this would need to be considered in a future FDS. Should further feedback be received between this report being completed and the deliberations meeting, officers will provide a verbal update at the deliberations meeting.

20.21 New site T-198 – Falcon Ridge winery, Higgins Rd Brightwater. This scores better than the existing rural residential site at Teapot Valley in Brightwater (T-54), 91<sup>st</sup> best site versus

138th and appears a better site generally in several respects. Little feedback was received from the landowners of site T-54 during consultation but a submitter of adjoining land sought for his land to be added to site T-54 (new site T-199 4 Teapot Valley Rd). Submitters have not been supportive of rural residential sites generally in their submissions but they are needed for capacity and site T-198 seems a better site, nearer to active transport opportunities for example. Site T-198 was put forward by the landowner (submitter #31435). Eight surrounding landowners were contacted to obtain their views on this site being proposed for rural residential in the future. Five landowners are supportive, two are against (one citing concerns about chemical spray drift from their nursery and complaints), one is still considering. Of those landowners that are supportive, a couple mentioned the flooding that occurs near the road. One also mentioned that the construction of the dam on the site has helped with flooding. This was identified in the MCA and the north eastern corner of the site may not be suitable for development. However it is a large site and issues like these will be further evaluated at the rezoning stage.

- 20.22 New site T-200 - 400 and 433 Pigeon Valley Road - this is a small extension to the Pigeon Valley rural residential area in the draft FDS (T32). Given the general concern in submissions around extent of greenfield sites proposed generally in Tasman, officers suggest changing the Pigeon Valley sites T28 and T32 to both become rural residential (instead of one standard residential and one rural residential). Neither of the existing sites score particularly well, however if both sites become rural residential their scores improve to 85<sup>th</sup> and 120<sup>th</sup> respectively due to lack of servicing costs for Council. T-28 then becomes the best ranking rural residential site. However, if the site is developed for rural-residential use, it will compromise the opportunity for this area to be developed for residential use in the longer term. This might constrain opportunities for Wakefield's growth in the future. The yield of both sites together was previously 1,250 dwellings (as a rural residential and standard residential site). If this was reclassified to rural residential for both sites it would dramatically reduce yield to about 600 dwellings which would in turn reduce GHG emissions. Site T-200 was put forward by one landowner (433 Pigeon Valley Road) on behalf of two landowners (Submitter #31461). Officers have spoken to the other landowner (405 Pigeon Valley Road) and they are very supportive of the proposal.
- 20.23 Submitters have not been supportive of rural residential sites generally in their submissions but site T-28 and T-32 have been included for capacity for the future expansion of Wakefield. Five surrounding landowners were contacted to obtain their views on this site being proposed for rural residential in the future. Officers are still waiting to hear back from three landowners. Two other landowners are unsure about the proposals citing the proximity of the site to forestry and they like the area as it is in lifestyle use. In this regard it is noted that T-28 and T-32 adjoins forestry in places and the future development of this area is for continued lifestyle blocks. Proximity to forestry alone does not necessarily indicate the level of wildfire risk. Factors such as the amount of fuel source, the remoteness of the location, access and egress, design of houses, local climate and density of housing and whether there is scope to mitigate risk around the house (eg fire bunkers) are all important.
- 20.24 New site T-205 and site T-213 (14 Waiwhero Rd and 319 Motueka Valley highway respectively) are adjacent and both represent an extension to site T17, the rural residential area near Mytton Heights in Motueka. Housing capacity in Motueka is heavily constrained due to natural hazards and highly productive land and site T-17 is the closest to Motueka identified. These two new sites adjoin site T-17 and have been put forward by 2 landowners (submitters # 31785 and #31458). They rank similarly to site T-17 (which is a large site and comprises 2 parts) but highlight some individual differences. Site T-205

ranks 173rd, site T-213 ranks 147th and existing site T-17 ranks 157th. A number of other landowners in the Motueka Valley area have proposed sites for inclusion in the FDS. They certainly consider there is demand in that location.

- 20.25 Submitters have not been supportive of rural residential sites generally in their submissions. 13% of submitters agreed with greenfield growth in Motueka. These options have been proposed to provide some growth opportunities for the Motueka area, with the sites nearest to the town being proposed. There are no other surrounding landowners for these sites as the landowners of T-205 and T-213 own much bigger blocks than are being proposed.
- 20.26 New site T-206, Hickmott Place car park Motueka (100 spaces). This is a Council owned site which has been suggested for mixed use development, commercial and apartments above. The car park currently appears to be used by the adjoining supermarket. This site scores very highly ranking 14<sup>th</sup>. The site was put forward by member of public (submitter #31240). Wastewater servicing already exists, there would be some challenges for water servicing, connecting to the existing reticulation but it would be possible. There are some other issues for consideration with this site including (i) the car park is fairly well utilized according to recent surveys (although it appears to mainly be used by supermarket shoppers and town centre users at peak times); (ii) if the car park was to be reused it may trigger the need for revision of the 2018 town centre car parking strategy; (iii) the New World car park adjacent is at less than 50% capacity on average; the site could be developed for apartments with car parking retained below. While under existing commercial rules in the TRMP, residential is already permitted above a commercial ground floor in the commercial zone (such as this site), there is a permitted height restriction of 10 metres. Also the FDS has not factored capacity such as this into our estimate of zoned capacity. Therefore, the site is recommended for inclusion.
- 20.27 Surrounding landowners were not contacted since the site is already zoned for commercial use and the development proposed is already possible under existing RMP rules. Officers can confirm that no lease arrangement exists with the nearby supermarket operator either.
- 20.28 New site T-217 at 79 Main Road Tapawera, is a small site for residential but it scores well, ranking 72nd and more capacity is needed in Tapawera. It scores better than the other site in Tapawera which ranks 79th. The site was put forward by a submitter (#31757), not the landowner. The property is currently for sale. Officers have contacted the landowner separately and he is supportive of the proposals in principle. There are some boundary changes that may need to occur in advance of any development and the landowner would prefer to have some control over the layout of any development. During the Tapawera specific FDS consultation webinar, three attendees queried whether the Councils had accurately estimated future housing demand for Tapawera, citing the explosion in the hops industry and the inability currently for people to age in place in Tapawera.
- 20.29 Five surrounding landowners were contacted to obtain their views on this site being proposed for residential in the future. Four landowners are supportive (although one cited noise disturbance as a concern) and one is unsure due to enjoyment of the view currently opposite the site. In this respect it is important to consider that the site is already zoned industrial and therefore a building could be erected on the site. Also the NPS UD (Policy 6) notes that when making planning decisions that affect urban environments, decision-makers have particular regard to the planned urban built form in RMA planning documents and how it may involve significant changes to an area, and those changes: (i) may detract from amenity values appreciated by some people but improve amenity values appreciated

by other people, communities, and future generations, including by providing increased and varied housing densities and types; and (ii) are not, of themselves, an adverse effect

- 20.30 New site T-219 at 3177 Korere Tophouse Rd St Arnaud – adjoins another existing large rural residential site in the draft FDS (T-181). Site T-219 does not score quite as well as T-181 (132<sup>nd</sup> versus 90<sup>th</sup>) due to scoring differently for terrestrial ecology and biodiversity and impact on life sustaining quality of natural resources and ecosystems, but the two sites together could be included in the FDS with the actual boundary of this site to be determined at the rezoning stage. The site was put forward by a submitter, not the landowner (submitter #31757). Officers have contacted the landowner separately and he is supportive of the proposals. During the FDS consultation webinar for St Arnaud (7 April 2022), some questions were raised by attendees about lack of employment opportunities in St Arnaud if more people are going to live there; the Council panel also asked attendees (ten in total) where they thought the town needed more housing for permanent residents given it's very large holiday home component (80%) and some responded that its population is declining from what it once was, potentially due to the age demographic and that the town needs more young people to create a sustainable community. This sentiment was echoed by submitter #31204 during the hearing, citing the local school as needing a higher roll to survive.
- 20.31 Three surrounding landowners were contacted to obtain their views on this site being proposed for rural residential in the future. One landowner has yet to respond, another (DoC) does not object and the third is not sure. He enjoys the current privacy of the area but noted generous planting/screening could assist with any development. In relation to comments about amenity changes, please see above for commentary on site T-217.
- 20.32 Amended site - Landowner of 106 Jeffries Road Brightwater seeks for all of his land to be included in T-01, (Jeffries Road) not just half. This land is roughly opposite some submitters' who are landowners of other sites who did not want their land to be included in the FDS, but they did not comment on other parts of T-01 specifically. The small addition makes a small further contribution to the overall capacity of site T-01 which has already been recommended by officers for inclusion in the draft FDS. An adjacent landowner to the extended area was contacted and he supports the inclusion of the whole of 106 Jeffries Road provided his land could also be included. This could be possible and the exact boundary of site T-001 would be determined at the rezoning stage.
- 20.33 Amended site T-37 (Fairfax Street Murchison) has been much reduced in size following discussions with landowner for the Tasman growth plan change. The Growth Plan Change has engaged the community, iwi, stakeholders and the landowners on this amended boundary during March and April 2022. The landowner of T-37 remains keen to develop. The landowner to the south of T-37 indicated they did not wish to develop their land, hence it was removed. The community indicated they were supportive of this as a location close to the town centre. Letters were sent to the landowners and adjoining landowners in March 2022 informing them of the plan change and FDS proposals .
- 20.34 Amended site T-145, Page Road, Tākaka proposed for light industrial, has been reorientated (rotated by 90 degrees) after discussions with the landowner following their submission. There is an adjacent landowner but they were already previously adjacent to site T-145 and notified when the draft FDS was consulted on.
- 20.35 Amended site T-195 Massey St Arnaud, is much reduced in size from that originally sought by the landowners to be assessed for the FDS but takes in an additional small parcel of land. This land is also now being proposed for rezoning currently, alongside the Growth Plan Change but it didn't form part of the engagement for the Plan Change in March/April

2022. The proposal is for a cultural facility with outbuildings, it will be self serviced and guests may stay overnight occasionally.
- 20.36 The site is owned by the Ngāti Apa ki te Rā Tō Trust and includes land which was returned to them through the Treaty settlement process as a cultural redress property. The surrounding conservation land is managed by DoC and DoC has no objection to the proposals. Letters have been sent to two other surrounding landowners to obtain their views on 18 May.
- 20.37 Amended site T-42 (Stafford Drive, Māpua, residential) is a small extension to south-west corner of the site to align with further evaluation for the Growth Plan Change. The Growth Plan Change has engaged the community, iwi, stakeholders and landowners on this amended boundary during March and April 2022. The area was extended as this is the full area of the existing deferred Rural Residential Serviced area and also includes an indicative road that goes to Stafford Drive. Consistent with the submissions on the draft FDS, some members of the Māpua community have questioned the demand for housing, whereas others have felt strongly that additional land should be included in the town for development. Letters were sent to the landowners and adjoining landowners in March 2022 informing them of the plan change and FDS proposals. There are five immediately surrounding landowners. Two are supportive of the proposals, provided their land can also be included. Two are against and one is unclear but does not want their property to be included (it is outside of site T-42).
- 20.38 Iwi have raised some concerns over this development area, although for the 2019 FDS no concerns were raised with this particular development area. Discussions are ongoing with iwi and the Subcommittee will be updated during deliberations.
- 20.39 Amended site T-107, Edward Street, Wakefield is a small area in the south east, excluded following further evaluation in the Growth Plan Change. The Growth Plan Change has engaged the community, iwi, stakeholders and the landowner on this amended boundary during March and April 2022. Letters were sent to the landowners and adjoining landowners in March 2022 informing them of the plan change and FDS proposals. Discussions with the landowner as part of the engagement on the Plan Change concluded he was comfortable with this small exclusion which did not propose many houses in any case.
- 20.40 Amended site T-05 (Wanderers Avenue, Brightwater) has been slightly extended in size, following further evaluation in the Growth Plan Change. However, the yield of houses has not increased due to constraints of the land included, as this is to allow for an esplanade reserve. The Growth Plan Change has engaged the community, iwi, stakeholders and landowners on this amended boundary during March/April 2022. One of the landowners of this amended site felt an indicative esplanade reserve is not required. However, feedback from the community indicated reserves should be included. Letters were sent to the landowners and adjoining landowners in March 2022 informing them of the plan change and FDS proposals. Feedback on the Plan Change centred around flood risk in this area and increased traffic onto Lord Rutherford Road.
- 20.41 Amended site T-28 (see above – proposed for rural residential rather than standard residential). This would reduce the yield of this site from 953 to 212 dwellings and in doing so would reduce the GHG emissions of residents. When rescored for rural residential rather than standard residential it becomes the highest scoring rural residential site in the urban environment the 85<sup>th</sup> best ranked site). Submitters have not been supportive of rural residential sites generally in their submissions, or greenfield sites, largely out of concern for increased GHG emissions. In recognition of that fact, reducing the density in

this location reduces the number of dwellings significantly and hence GHG emissions, while still retaining an option for the growth of Wakefield. As noted earlier, this change could have implications for the future growth of Wakefield.

### **Sites to be removed**

- 20.42 As a result of new sites being assessed and some included (details above) it does mean that some sites are proposed to be excluded from the draft FDS where they do not score as well. These are:
- 20.43 Remove site T-41 (88 Valley Road, Wakefield, residential), since this site no longer scores as well as other sites in the urban environment due to new sites being proposed in Nelson through submissions. Site T-41 was not specifically mentioned by a significant number of submitters. Site T-41 ranks 133<sup>rd</sup> and is the worse scoring greenfield site.
- 20.44 Remove site T-54 (Teapot Valley, Brightwater), since there are better performing comparable sites, proposed through submissions, notably site T-198. Site T-54 was not specifically mentioned by a significant number of submitters, other than the owners of site T-199 who adjoin T-54 and wished for their land to be included. Site T-199 is highly productive land and was ruled out as a 'no-go' constraint.

### **Infrastructure requirements of new sites**

- 20.45 Officers have considered the infrastructure requirements of any new sites proposed for inclusion in the FDS. A number of the sites are rural residential (unserviced) and so do not impact Council's three waters servicing requirements. Site T-204 (Beechnest Drive) does face some expensive servicing challenges which would need further consideration by Council especially given development contributions are not collected in St Arnaud.
- 20.46 For the two Nelson sites, the infrastructure required is similar to that for the two areas that they are extensions of. For N-115 (Saxton Extension) there will be the requirement to extend water infrastructure to the site but this will be done via the main site N-011 (Saxton) when it is developed. For N-116 (Orphanage West Extension) this situation is similar but with the added need to rely of the high level reservoir needed to serve the areas below in the Ngawhatu Valley.

### **Options**

- 20.47 Option 1: Add new sites that have scored as well as or better than existing sites included in the draft FDS; exclude sites proposed in submissions that do not score as well as or better than existing sites included in the draft FDS; and remove a worse performing site (i.e. site T-41) currently in the draft FDS. Such a scenario may comprise:

#### *NCC sites*

- expand both area N-011 and N-112 by adding two additional areas called N-115 and N-116. Leave the area N-011 as a single residential greenfield expansion area with any other land use to be considered as part of a plan change or resource consent application; and
- Port Nelson and Nelson airport: remove area N-102 and the part of N-034 inside the 55dBA airport noise contour in response to concerns from the Nelson Airport management and recognition of the strategic importance of the airport to the regions.

#### *Tasman District Council sites*

- add site T-198 and remove site T-54;



- change existing site T-28 typology to rural residential from standard residential and add adjoining site T-200;
- add sites T-205 and T-213 to existing FDS site T-17;
- add site T-206;
- add site T-217;
- add site T-219 to adjoin existing FDS site T-181;
- slightly enlarge site T-01 to include all of 106 Jeffries Road;
- slightly enlarge site T-05;
- slightly enlarge site T42 - small extension to SW corner of site to align with Growth Plan Change;
- amend site T107 - small parcel of land removed to align with Growth Plan Change boundary following further evaluation;
- reduce size of site T-37;
- amend orientation of site T-145;
- reduce scale of site T-195 overall but to include a small parcel of land; and
- remove site T-41.

20.48 Option 2: Retain the draft FDS unchanged with existing sites.

20.49 Option 3: Add new sites proposed in submissions and remove existing sites included in the draft FDS, different from that suggested above, provided it confirms with the MCA and preferred spatial scenario and the other considerations set out above in 20.4.

#### **Officers' recommendation**

20.50 Officers consider the changes above in option one represent improvements on sites currently included in the draft FDS. Officers recommend option one.

#### **Other matters raised by the FDS Subcommittee**

20.51 During the hearings, the members of the Subcommittee raised issues and asked questions of officers relating to the written submissions and verbal submissions. These questions have been recorded and responses either incorporated into this deliberations report or contained in the attached question and answer document. Should members of the Subcommittee need further clarification, this will take place during the deliberation meetings.

20.52 This section provides the Subcommittee with the opportunity to raise any other issues or matters from the submissions and hearings that may have not been covered in this report. This is especially for those matters where further discussion is required or where potential changes should be made prior to finalising the FDS.

<b>21</b>	<b>Role of FDS Subcommittee</b>
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21.1 The next step in the process is for the FDS Subcommittee to deliberate on the various matters which require decisions to enable the final FDS to be prepared. When making recommendations the Subcommittee needs to consider the reasonably practicable options

for achieving the objectives of the decision and to assess the options in terms of their advantages and disadvantages. The submission process helps the Subcommittee to identify the advantages and disadvantages and to assist to understand the views of its community.

- 21.2 Submission processes do not amount to a poll, or a vote on any proposal. Submissions are a means of allowing the Subcommittee to gather an indication of the views and preferences of the people in our regions. They are one input into the Subcommittee’s recommendations, along with other information and advice the Subcommittee seeks or is provided by officers.
- 21.3 The Subcommittee should consider whether, there is a need for further consultation with the community on the new proposed and amended sites, having taken into account the latest information officers have provided above on further consultation with surrounding landowners to specific sites, subsequent to submissions closing. It should consider whether it has enough information on the views and preferences of the people who may be affected by the additional sites, amended sites and sites to be removed, from submissions generally and specific feedback from the further limited consultation. Under section 82 of the Local Government Act on principles of consultation, subsection (4) states a Local Authority must have regard to:
- 21.3.1 (b) the extent to which the current views and preferences of persons who will or may be affected by, or have an interest in, the decision or matter are known to the local authority; and
- 21.3.2 (c) the nature and significance of the decision or matter, including its likely impact from the perspective of the persons who will or may be affected by, or have an interest in the decision or matter; and.....
- 21.3.3 (e) the costs and benefits of any consultation process or procedure.
- 21.4 A large number of submissions (568) were received on the draft FDS from individuals and groups within the community and these have been summarised in this report and in Attachment 3 “Summary of submissions”. Submitters are able to address wider (regional) issues, or choose to focus on specific matters and sites. No one submission or set of submissions can be taken to represent the wider views of the community. Each submission needs to be considered on its own and together with all others, to evaluate community views and preferences. In evaluating these submissions they need to be considered in terms of their content and relief sought and in the context of the size of the Nelson and Tasman communities (circa 55,500 and 58,000 respectively). The submissions also need to be considered in light of the context that they were requested i.e. the draft FDS and its objectives. Submitters may not necessarily be representative of the views of the wider community.
- 21.5 The questionnaire that formed part of the Statement of Proposal included a question (question 33) which asked the community “whether any additional areas should be included for housing or business growth or if there are any proposed areas that you consider are more or less suitable”. It is therefore consistent that the Subcommittee should consider the sites and suggestions that have been put forward by submitters and consider whether they should be included in draft FDS. Officers have recently sought the views of surrounding landowners on new and amended sites (subsequent to submissions closing) and these are detailed in this report.
- 21.6 The Subcommittee needs to consider the content of the submissions received not just the quantity of submissions. The substance of the arguments put forward by submitters, along

with the advice of officers, should together influence the Subcommittee’s recommendations to the Joint Committee of the Nelson City and Tasman District Councils. Submissions are not the sole source of knowledge about community views and preferences on growth. The Subcommittee will have a broad understanding of these issues already through other engagement exercises and consultations on other recent Council plans, as well as through experience of speaking with the community.

- 21.7 The FDS is a high level, non-statutory strategy. That said it informs a wide range of other plans of both Councils. All members of our community affected by the proposals in the eventual FDS will have further opportunities to engage and submit to both Councils, if/when sites are proposed for rezoning through changes to or reviews of Councils’ resource management plans.
- 21.8 The cost of the further limited consultation on new and amended sites undertaken by officers recently was small, when considering the benefits of obtaining those views of landowners surrounding the sites. It was a relatively straight forward exercise and the scale of further consultation was proportionate to the scale of changes recommended by officers to the draft FDS. Officers consider further consultation is therefore not necessary. However should the Subcommittee recommend further consultation on any proposed changes to the FDS, the costs of doing so would need to be weighed against the benefits.
- 21.9 For example, the costs of delaying the FDS may outweigh the benefits of additional consultation particularly when considered against the fact that the sites will need to go through other planning processes prior to being developed. The NPS UD (sub part 4 clause 3.12) requires tier 2 local authorities to prepare and make publicly available an FDS in time to inform the preparation of the next LTP. Tasman District Council has already commenced work on its next LTP and it is therefore important that the FDS is concluded before September 2022 to enable preparation of this plan and other plans that form part of the LTP. The 2019 FDS is no longer compliant with the NPS UD and uses outdated demand projections.

**22 Decision making options**

22.1 The decision making options are outlined in the table below. The Subcommittee has the options of accepting the officers’ recommendations; or adding additional changes or reducing them; or making no changes from what was proposed in the Consultation Document and the technical report.

Option	Advantage	Disadvantage
1. Accept officers’ recommendations (recommended).	Officers have considered the submissions and further limited consultation and have made suggestions as to what changes can be accommodated within FDS, that are in scope.  Some submitters will receive changes that they have requested.	The Subcommittee will not be recommending all of the changes requested by submitters. Given the varied views the Subcommittee received, it is not possible to meet all the views and preferences presented.

<p>2. Direct officers to undertake further consultation in relation to the new sites proposed through submissions</p>	<p>The Subcommittee may feel that it still does not have sufficient information on current views and preferences of persons who will or may be affected by, or have an interest in, the FDS. Further consultation would clarify any particular changes of concern to the Subcommittee.</p>	<p>The costs of delaying the FDS by undertaking further consultation, may outweigh the benefits. The Council's would not have an FDS in place in time to inform the next LTP. The Councils may not be complying with the NPS UD in this respect. The 2019 FDS is no longer compliant with the NPS UD and uses outdated demand projections.</p>
<p>3. The Subcommittee could recommend changes to the officers' recommendations and either add additional changes or reduce them.</p>	<p>The advantages will depend on the changes the Subcommittee recommends</p>	<p>The disadvantages will depend on the changes the Subcommittee recommends</p>
<p>4. The Subcommittee could recommend not to make any changes to what was proposed in the Statement of Proposal and the technical report.</p>	<p>Less change would be needed to the documents for the FDS.</p> <p>This approach would be appropriate if the Subcommittee recommends that the approach taken in the draft documents was correct and that there are no changes needed as a result of the submissions or further limited consultation recently undertaken.</p>	<p>The Subcommittee would not be recommending any changes as a result of the consultation process.</p> <p>This option could have reputational damage to the Councils if submitters consider that the consultation process did not lead to any changes</p>

### Officers' recommendations

- 22.2 Officers recommend option one above, although acknowledging that option 3 may also be recommended during the course of deliberations. Officers consider that the Subcommittee is well informed about views of the community through the submissions, the hearings and the further limited consultation reported above. Officers consider the cost and associated delays of any further consultation would outweigh the benefits of not having an FDS in place in time to inform the LTP 2024 and other Council plans.
- 22.3 As is detailed below under 'significance and engagement' officers consider that the new sites recommended for inclusion do not represent a significant change in the context of the overall FDS development area. Looking across all of the changes proposed from the draft FDS, there is a total of 123 ha of additional land proposed, or 3.6% of the total development area consulted on in the draft FDS. This represents a relatively small change

to the draft FDS as a whole and as such, can be considered to amount to a reasonably anticipated outcome. Also, the FDS does not rezone the land.

## **23 Strategy and Risks**

- 23.1 The key risks are reputational and litigation related. Some people may support the Subcommittee's decisions but others may oppose them and seek to judicially review the Council's eventual decision.
- 23.2 The Councils received a range of community and organisational views on the matters consulted on through the FDS Statement of Proposal. The Subcommittee's role is to consider the views of the community, officers' recommendations and other advice it receives in order to make decisions for the preparation of the final FDS. Such other advice may comprise the consultants' advice attached to this report for example. The Subcommittee may require further advice before making its recommendations on the draft FDS. The Subcommittee will need to consider whether it has sufficient information on the views and preferences of people who may be affected by the additional or amended sites proposed for the draft FDS and any sites proposed to be removed. This information is from the submissions generally, the further limited consultation undertaken by officers recently as well as the understanding of the Subcommittee of wider issues than was able to be articulated to the public through the consultation process.
- 23.3 In considering the risks associated with the FDS to both Councils, it is useful to consider the following issues:
- Compliance with the LGA
  - Review of submissions
  - How well you understand the views of the community on any matters that may be changing from the Statement of Proposal consulted on
  - Process of considering new sites
  - Compliance with the requirements of the NPS-UD, RMA and associated instruments
  - Questions and issues raised by the Subcommittee
  - Implications of having no FDS
- 23.4 Compliance with the SCP process is critical in ensuring that the public have all of the information they need to make an informed submission. Failure to meet the requirements of the SCP process would put the FDS process at risk of legal challenge.
- 23.5 The FDS consultation process to date has followed the SCP process closely and is compliant with the requirements of the LGA. Additionally, early engagement prior to developing the draft FDS has allowed a more robust draft document to be presented as part of the SCP.
- 23.6 One aspect of the consultation that differed from the usual methods that both Councils use is the online webinar format that allowed the public to ask questions about the draft FDS. This would usually occur face to face in public drop in sessions around each district, but this was not possible due to the restrictions that COVID 19 posed. This element of the consultation is not strictly required but the webinars did provide both a useful forum for questions from the public as well as a level of feedback. They were well attended with over 300 people joining.

- 23.7 The SCP process is intended to ensure that those that wish to have their say can in an effective manner. It is therefore critical that all submissions have been given an appropriate level of consideration during the process. Submissions have been received in three main formats, online in the submission database, email and hardcopy. Both Councils have had admin officers responsible for processing these submissions so that they are all contained within the submissions database for consideration by officers and for distribution to the members of the Subcommittee.
- 23.8 During the process of reviewing submissions, each submission has been read by more than one officer as well as by at least one member of the consultant team. The information that these submissions contain has been summarised and distilled down to inform the contents of this report and its supporting documents.
- 23.9 After considering the submissions, officers mapped and assessed new sites proposed as well as amended sites and considered the effects on capacity of removing certain sites as requested by unsupportive landowners, or sites that scored poorly in the MCA. Officers then undertook limited consultation with surrounding landowners of new and amended sites, to obtain their views on these new proposals. Officers consider this provides a robust picture of landowners' views on the latest proposals. Combined with the views already expressed by the community through submissions, officers consider the Subcommittee has sufficient information on the current views and preferences of persons who will or may be affected by, or have an interest in the FDS.
- 23.10 There is of course a risk that elected members may choose to not progress the FDS to its final adoption in time for it to inform the LTP 2024-2034 as required by the NPS UD. The implications of not adopting an FDS are that neither Council would have an up to date FDS to inform its other Council plans, including its LTP (including its Infrastructure Strategy) and any new Resource Management Plan. It is a requirement of the NPS UD to have an FDS in place in time to inform the LTP. The implications of this are not absolute as the level of non-compliance would be considered during any challenge to the Councils' processes and any response to any successful challenge. The relevant sections of the RMA are provided below however.
- 23.11 Sections 24 and 25 of the RMA provide the functions of the Minister for the Environment. These include the monitoring and effect and implementation of the RMA and national policy statements. Section 24A provides the Minister with power to investigate the exercise or performance by a local authority of any of its functions, powers or duties under the RMA and make recommendations. Section 25 provides residual powers to the Minister for the Environment, such that he can appoint one or more persons to exercise or perform all or any of the functions, powers or duties in place of the local authority.

## **24 Policy/Legal Requirements/Plan**

- 24.1 The Councils are required to use the SCP when preparing the FDS. The relevant requirements of the SCP are found in sections 83 and 87 of the LGA. The general consultation requirements in section 82 apply to all consultation, including use of the SCP.
- 24.2 Section 83 provides that the Councils must prepare a statement of proposal (SOP) including a summary of information and a draft of the FDS. The SOP has formed the basis of the Councils' public consultation process. The Councils distributed the summary of information in each service centre and library and restocked, and made the full SOP publicly available. Written submissions were invited on the proposal, and any submitter had

the opportunity to be heard in support of their submission. Following the submission, hearing and deliberation process, the Subcommittee will make recommendations to the Joint Committee of the two Councils which will make the decisions prior to the final FDS being adopted.

- 24.3 The process undertaken by the Councils on the FDS to date complies with the requirements of the LGA.
- 24.4 The consultation undertaken through the FDS Statement of Proposal provides the Subcommittee with an understanding of views and preferences of the submitters. When deliberating, the Subcommittee should also consider that it has heard from 568 submitters representing individuals and a range of organisations. There are approximately 58,000 residents in the Tasman District and 55,000 residents in Nelson City who are also likely to have a range of views and preferences in relation to the matters contained in the FDS. The Councils are not obligated to adopt any position that is advanced to them – even one that has majority support.
- 24.5 When the Subcommittee makes a recommendation, it considers community views as one input into its decision making process. The Subcommittee has a wider understanding of the issues than was able to be fully articulated to the public through the consultation process. It is privy to additional information and advice and needs to consider each matter in the context of what it is trying to achieve for the regions and its residents, now and into the future.
- 24.6 There are other factors that the Subcommittee must have regard to in complying with the decision making provisions in the LGA including the principles in section 14 of the Act, the Councils' resources and the extent to which the nature of the decision, or the circumstances in which it is taken allow the Council the scope to consider options, or the views and preferences of persons. The present circumstances include the need for the Councils to meet the legislative timeline for the FDS to be finalised and adopted by the Councils in time to inform the next LTP. This timeframe makes further consultation by the Councils on any of the matters in this deliberations report difficult but not impossible. In this context officers recommend that sufficient additional consultation has been undertaken recently on the new and amended sites.
- 24.7 The section 14 principles that are relevant here are:
- 24.7.1 openness and transparency;
  - 24.7.2 giving effect to the Council's identified priorities and desired outcomes in an efficient and effective manner;
  - 24.7.3 the views of all communities;
  - 24.7.4 community well-being and the interests of future as well as current communities;
  - 24.7.5 your strategic priorities and desired outcomes;
  - 24.7.6 collaboration with other bodies;
  - 24.7.7 prudent stewardship of resources; and
  - 24.7.8 effective future management of assets.

## **25 Consideration of Financial Budgetary Implications**

- 25.1 The financial implications for the Councils relating to the decisions being made in this report follow.

- 25.2 Changes required to the FDS document to finalise it are allowed for in the existing officers' and consultant budgets so there are no financial implications in this respect.
- 25.3 The FDS does not have the power to force changes directly to the LTPs where the final decisions are associated with infrastructure servicing. That being said, the FDS does provide a strong direction to both the LTP and RMP Review processes, so the Councils will be required to take this into account. Both Councils have development contributions policies that require the cost of the growth portion of new infrastructure to be met by developers. In most cases this infrastructure is built in advance of the development occurring by the Councils and it is often debt funded before the costs are recovered through development contributions.
- 25.4 The interest costs associated with this borrowing is also part of the development contributions so in effect the cost to the Councils in the long term is minimal.

## **26 Significance and Engagement**

- 26.1 The Councils have undertaken a SCP process to enable them to understand the views and preferences of the community. The SCP process and notified proposal itself makes it clear that the final proposal may change as a result of the views expressed by the community and in response to other information the Council receives from consultants, officers or other sources. Therefore, the final proposal after consultation may be different from the draft proposal which was put out for consultation.
- 26.2 The Councils must have open minds to being persuaded that its proposal should not be adopted without change, and/or that something else should be adopted in its place. However, in order to be fair to submitters who have become involved, and those who may have chosen not to participate (given the terms of the SOP), it is appropriate that there are limits to the extent to which changes can be made without having to undertake some form of additional consultation or engagement.
- 26.3 The purpose of assessing the level of significance of any changes proposed at this stage in the process is to provide the Subcommittee with an understanding of potential implications of those changes. This assessment can then guide the Subcommittee on the level of understanding members may already have in relation to a potential change and on whether it is necessary to undertake any additional consultation or engagement with landowners, specific groups or interested parties.
- 26.4 The matter that needs to be considered with reference to the significance and engagement policies of both Councils is the level of significance of any changes recommended and/or finally adopted compared to the draft FDS that went out for public consultation. As outlined in this report, the potential changes that will need to be considered are:
- addition of new and amended sites;
  - changes to existing site boundaries in draft FDS;
  - removal of sites in draft FDS; and
  - greenfield/intensification split.
- 26.5 Alongside the potential changes to the draft FDS, the following matters need to be considered:



- whether the Subcommittee has enough information on the views and preferences of people who might be affected by the addition of new or amended sites or sites which are proposed to be removed;
  - the nature and significance of the decision, including its likely impact from the perspective of persons who will or may be affected by, or have any interest in, the decision or matter;
  - the costs and benefits of any consultation process or procedure;
  - whether the change is larger than could have been reasonably expected by the public;
  - any additional processes and decisions involved under the RMA and LGA before any development occurs, which will likely have separate and specific consultation processes.
- 26.6 If the changes are considered to be of a high level of significance/significant then further engagement may be required, unless the Subcommittee considers it already understands the likely views of the community in relation to the proposed changes, or there are other factors that weigh against the benefit of further engagement.
- 26.7 The FDS's broad, strategic policy nature would generally suggest that further consultation is not required, especially given the further limited consultation that officers have undertaken since submissions closed. However, the Subcommittee will need to turn its mind to whether any of the proposed changes would not have been "reasonably foreseeable" consequences of the process. If considered necessary, the Subcommittee could request additional advice from officers in advance of making any recommendations or potentially decide to undertake further focused consultation on specific matters prior to decision making. There is no statutory requirement to consult in relation to any change to a proposal however, with that decision needing to take into account several factors. Officers recommend that the Subcommittee members turn their minds to whether additional consultation would be necessary or appropriate in relation to any of the changes proposed in terms of whether that would be likely to provide additional and necessary evaluative material. The costs and benefits of any consultation process or procedure must also be considered.
- 26.8 For the Nelson area, the changes to the FDS growth areas associated with the inclusion of new sites are considered relatively minor. There are only three changes in the form of extensions to three existing areas. Two new extension areas adjacent to the Saxton and Orphanage Stream West FDS areas have approximately 10 immediately adjacent neighbours and are only approximately 20 ha in size. The extension of N-109 Wood South to include the property at 123 Halifax Street East has approximately six immediate neighbours and is approximately 2 ha in area.
- 26.9 Officers consider that these two Nelson areas do not represent a significant change in the context of the overall FDS development area as it represents a net addition of 69 ha or 2% of the total FDS land capacity of 3379 ha that were notified in the SCP. Also these sites are adjacent to other sites proposed in the draft FDS so the public could reasonably have expected some areas to be expanded following consultation.
- 26.10 Officers consider that the eight new Tasman sites, the five amended Tasman sites and the four Tasman sites to be excluded do not represent a significant change in the context of the overall FDS development area. It represents a net addition of 54 ha or 1.6% of the total FDS land capacity of 3379 ha that were notified in the SCP. (In Tasman there was an increase of 142 ha but a loss of 88 ha).

- 26.11 Looking across all of the changes proposed from the draft FDS, there is a total of 123 ha of additional land proposed, or 3.6% of the total development area consulted on in the draft FDS. This represents a relatively small change to the draft FDS as a whole and as such, can be considered to amount to a reasonably anticipated outcome for the wider community. Also, the FDS does not rezone the land. Before the land can be developed, there will need to be a plan change process or resource consent process undertaken. A plan change process would require public consultation and enable anyone affected by the proposal to have an opportunity to comment before the land was rezoned. A resource consent process would require consideration of the potential impacts on neighbours before deciding whether to publicly notify any consent application.
- 26.12 The FDS Subcommittee will need to consider whether it has sufficient information and understanding of the community's views and preferences (from the submissions on the draft FDS the subsequent limited consultation and other information it has) of landowners likely to be affected by new and amended sites being proposed.
- 26.13 Overall, the level of significance of the decisions sought through this report are considered to be of a low to moderate level of significance. Adopting the FDS itself is likely to be a moderate level of significance, given the large number of submissions received on the draft FDS. Officers have sought the views of iwi on the new and amended sites proposed for inclusion in the final FDS and some iwi have responded; the views of landowners whose properties were proposed for inclusion by others; and the views of landowners surrounding new proposed and amended sites.

	<b>Issue</b>	<b>Level of Significance</b>	<b>Explanation of Assessment</b>
1.	Is there a high level of public interest, or is decision likely to be controversial?	Moderate	<p>Some sites like the Maitai/Kaka Valley sites are of high public interest. However, officers are not proposing to change these sites from what was included in the proposal consulted on. Also, the Subcommittee has a good understanding of the views of the community from the submissions and from other public input on the matter.</p> <p>The majority of the changes proposed to the draft FDS will have a low to moderate level of significance, but recommending the FDS for adoption itself will have a moderate level of significance, as partly evidenced by the 568 submissions received.</p> <p>The rural Tasman sites attracted low levels of public interest in the proposal consulted on, so changes in these areas may also be of a low level of public interest. The secondary proposal included in the SOP was of moderate public interest with some submitters supporting it and with others against it.</p>

	<b>Issue</b>	<b>Level of Significance</b>	<b>Explanation of Assessment</b>
			While the FDS is a non-statutory plan, it is an important guiding document for a range of other Council plans.
2.	Are there impacts on the social, economic, environmental or cultural aspects of well-being of the community in the present or future?	Moderate	The various changes proposed to the FDS through this report will have a mix of impacts on the various aspects of community well-being.
3.	Is there a significant impact arising from duration of the effects from the decision?	Low - Moderate	The FDS is a 30 year strategy which is reviewed every three years. There will be a longer term duration from any actions undertaken to implement the strategy over the coming three years.
4.	Does this activity contribute or detract from one of the goals in the Councils' climate change action plans or policies?	Moderate	Climate change impacts were raised by a large number of submitters. The analysis of those impacts is outlined earlier in this report under Vehicle Kilometres Travelled, GHG emissions and natural hazards and resilience of future development. The decisions relating to the changes proposed to the FDS do not of themselves impact on climate change, however, the implementation of these decisions will have implications.
5.	Does the decision relate to a strategic asset? (refer Significance and Engagement Policy for list of strategic assets)	Low	The changes proposed in the FDS do not of themselves directly impact on the Councils strategic assets. Subsequent decisions through LTP and Asset/Activity Management Planning processes will relate to strategic assets but not the whole systems of assets owned by the Councils. However the FDS does directly relate to the future of those strategic assets.
6.	Does the decision create a substantial change in the level of service provided by Council?	N/A	The decisions sought in this report do not directly impact on the Councils' levels of service in their LTPs.
7.	Does the proposal, activity or decision substantially affect debt, rates or Council finances in any one year or more of the LTP?	N/A	Any funding implications will be the subject of future Council decisions through LTPs.
8.	Does the decision involve the sale of a substantial proportion or controlling interest in a CCO or CCTO?	N/A	

	<b>Issue</b>	<b>Level of Significance</b>	<b>Explanation of Assessment</b>
9.	Does the proposal or decision involve entry into a private sector partnership or contract to carry out the deliver on any Council group of activities?	N/A	
10	Does the proposal or decision involve Council exiting from or entering into a group of activities?	N/A	
11	Does the proposal require inclusion of Māori in the decision making process (consistent with s81 of the LGA)?	Yes	Iwi have been invited to advise officers of their views on the new sites proposed for inclusion in the final FDS. An iwi representative is involved in the recommendations being made by this Subcommittee.

## **27 Conclusion**

27.1 The purpose of this report is to:

27.1.1 provide a detailed summary of the submissions received on the Nelson Tasman Future Development Strategy (FDS) 2022-2052 and supporting information and analysis of key submission themes;

27.1.2 provide the FDS Subcommittee with an opportunity to discuss and obtain advice from officers on the matters raised in the submissions, as well as discuss the responses officers have provided to its questions raised during the hearings; and

27.1.3 seek recommendations on the changes that are to be included in the final FDS and technical report, which will be considered by the Joint Committee of the Nelson City and Tasman District Councils on 27 July 2022.

27.2 This report is structured so as to align with the key themes raised through the submissions on the FDS during consultation. Officers have grouped the issues raised in submissions into key themes and the majority of points raised in the submissions have been covered.

27.3 The key themes considered in this report are:

27.3.1 Theme 1 - Growth projections;

27.3.2 Theme 2 - Housing land capacity calculation and uptake rate for housing intensification;

27.3.3 Theme 3 - FDS outcomes;

27.3.4 Theme 4 - Multi criteria analysis framework;

27.3.5 Theme 5 - Greenhouse gas emissions reduction;

27.3.6 Theme 6 - Greenfield/brownfield housing capacity split;

27.3.7 Theme 7 - Proposal for a new community near Tasman village;

27.3.8 Theme 8 - Site specific matters;

27.3.9 Theme 9 - Implementation – infrastructure;

- 27.3.10 Theme 10- Staging of development;
  - 27.3.11 Theme 11 - Building height – Nelson;
  - 27.3.12 Theme 12 - Natural hazards – Tasman, the Wood and Tahunanui, Nelson;
  - 27.3.13 Theme 13 - Strategic areas – Port Nelson and Nelson Airport; and
  - 27.3.14 Theme 14 - New sites and amended sites proposed through submissions.
- 27.4 The report summarises the submissions for each theme, provides analysis of the issues and makes individual recommendations for each theme.
- 27.5 As a result of 568 submissions on the draft FDS, officers are recommending a number of amendments to the draft strategy. These are provided in section 1.5 of this report.

## 28 Next Steps / Timeline

- 28.1 This report seeks the Future Development Strategy (FDS) Subcommittee’s direction on matters to enable officers to prepare the final FDS and accompanying technical report. The Joint Committee of the Nelson City and Tasman District Councils was scheduled to adopt the FDS on 27 July 2022. This has since changed slightly. The intention is for the Joint Committee of the Nelson City and Tasman District Councils to consider adopting the policy decisions arising from the FDS on 27 July 2022 and for the same Joint Committee to either consider adoption of the FDS itself by the end of August, or delegate adoption to the FDS Subcommittee by the end of August.

## Attachments

1. [⇒](#) Schedule of Speakers at the Submissions Hearing who appeared (*Under Separate Cover*)
2. [⇒](#) Minutes from the four days of hearings (*Under Separate Cover*)
3. [⇒](#) Submissions summary report (by Barker and Associates) (*Under Separate Cover*)
4. [⇒](#) Analysis report for deliberations (by Barker and Associates) (*Under Separate Cover*)
5. [⇒](#) Tasman District Council officers' memo on Vehicle Kilometres travelled and Greenhouse Gas emissions model (*Under Separate Cover*)
6. [⇒](#) Questions raised by FDS Subcommittee during hearings and responses (*Under Separate Cover*)