

## Submission on Publicly Notified Plan Change 29

30 October, 2023

To:

Senior Planning Administrator  
RMA Plan Submissions  
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### Submitter Details

|                |                             |
|----------------|-----------------------------|
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### Trade Competition

I could NOT gain an advantage in trade competition through this submission

### Council Hearing

YES, I wish to be heard in support of my submission

(See hard copy for signature and date of submission)

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Signature

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Date

The specific provisions of the Proposed Plan Change that my submission relates to are as follows:

- Entire plan change (in some aspects)
- Residential
- Other (process)

I,

- Oppose the Plan **in part**
- Request **amendments** to the Plan Change

### **My submission is:**

I object to and oppose Plan Change 29 (PC29) in its present form on three grounds:

- 1) There have been serious shortcomings in the **process** by which citizens and ratepayers of Nelson have been informed about Plan Change 29 and the arrangements put in place to obtain public input to the proposal. (details below in Part 1).
- 2) The analysis of past and projected future population growth in Nelson undertaken by the Nelson City Council (NCC) is **seriously flawed**, thus undermining the primary rationale for Plan Change 29 (details below in Part 2)
- 3) The proposal to make parts of Atawhai North “Medium Density” housing zone would have **negative consequences** for the environment and people of Atawhai (details below in Part 3)

### PART 1: THE PROCESS

(a) The **Time frame** is too compressed. The public was unaware of the details of Plan Change 29 until it had been under discussion within Council for between 2 and 3 years. The Plan Change was publicly notified on 11 August, 2023, at least seven months after selected “stakeholders” were consulted.

The initial time allowed for the public to make submissions was only 28 days. This was later extended to October 31, providing a total period of approximately 60 days.

Even this extended period provided **insufficient time** for the public to read, understand and respond to a large quantity of documentary material, which covered complex planning matters. The need for more time was especially acute in that the NCC has stated that:

**“Plan Change 29 is the biggest plan change that we have done as a Council in a generation”**  
(Our Nelson, Issue 176. P.6.).

A once in a generation plan change deserves a much longer period for public review and the formulation of submissions than the NCC has allowed for. Among other reasons, the need may

arise for a submitter to request further information from the Council under the Local Government Information and Meetings Act, 2019 (LGOIMA). Under this legislation, a council is obliged to make a decision and communicate it within 20 working days of the request. However, the decision to release or not release information is not the same as **actually releasing it**, which could take longer. In the case of a “once in a generation” plan change, sufficient time should be allowed for members of the public to make use of the LGOIMA.

Further:

(b) There was limited access to key documents. The NCC’s Section 32 Evaluation Report (which is the basic cost-benefit analysis of PC29) is 395 pages long and contains 29 appendices. While NCC made one hard copy of the Section 32 Report available in the Council lobby, access to the appendices is only possible on line through the Council’s web-page. The Local Government Act 2002 Section 5(3) states:

*If a local authority or a council-controlled organisation is required under this Act to make a document or other information publicly available, it must take reasonable steps to—*

*(a) ensure that the document or other information or a copy of the document or other information is accessible to the general public in a manner appropriate to the purpose of the document or other information, including, where practicable, on the local authority’s Internet site; and*

*(b) publicise, in a manner appropriate to the purpose and significance of the document or other information, both the fact that the document or other information is available and the manner in which the document or other information may be accessed.*

The NCC has breached Section 5(3) by not making at least one hard copy of Section 32 Evaluation Report (with all appendices) available at the Council chambers or the Public Library. This is a breach, we claim, because the internet is not accessible as a practical matter to the older population that may have little experience of laptop computers, tablets or smart phones. Even a smart phone is not a suitable device for reading large documents containing maps and graphs. The internet is one means of providing documents to the public but it cannot and should not be the **only or exclusive** method.

Furthermore, the NCC did not take older and vulnerable people into account when it refused, after a request (by me), to make at least one printed copy of all relevant documents in support of PC29 available to the public in the Council lobby.

(c) Some members of the panel that will hear submissions from the public on PC29 are apparently **not unbiased or impartial**, as required by the New Zealand Bill of Rights. The New Zealand Bill of Rights, under the heading 27 Right to Justice, states:

**27 Right to justice**

*(1) Every person has the right to the observance of the principles of natural justice by any tribunal or other public authority which has the power to make a determination in respect of that person's rights, obligations, or interests protected or recognised by law.*

The key principles of “natural justice” in circumstances like the proposed Plan Change 29 are:

- 1) No one should be a judge in their own cause*
- 2) A party should be informed of the allegations against it and be given an opportunity to answer those allegations*
- 3) A party is entitled to have its case heard by an unbiased and impartial tribunal*

Principle (1), otherwise known as ***Nemo judex in causa sua*** appears relevant in this context because some members of the panel, in their capacity as City Councillors, are also decision-makers on Plan Change 29. As principle (3) notes, parties to a hearing such as on Plan Change 29 under the RMA, are entitled to be heard by an unbiased and impartial tribunal. However, some of the Councillors who are also panel members have indicated a pre-existing bias by voting in support of PC29. **All members of the panel should be independent.**

#### PART 2: NCC'S TREATMENT OF POPULATION ISSUES IN SUPPORT OF PC29.

In its public statements and various Council documents, the NCC has been providing misleading information on past and projected future population growth in Nelson City in the context of promoting and justifying the need for Plan Change 29. This misleading information ranges from relatively minor errors to more serious statistical deficiencies. The principle that animates this submission is:

**The citizens, residents and ratepayers of Nelson have a right to expect that the Nelson City Council will adhere to the highest scientific standards (including accuracy and transparency) when making proposals to change the conditions of life within which we live.**

(a) Misleading statistics published in the NCC publication OUR NELSON. In the August 11 issue of OUR NELSON (Issue 176) it is stated that “Whakatu Nelson’s population increased by 13,400 between 1996 and 2020 (at a rate greater than the national average)”. Using Statistics NZ data<sup>1</sup>, the actual increase in the usually resident population of Nelson was 13,700 over that period (See References, document No. 19 under the heading “Other documents”). As shown in that document, the average rate of population growth in Nelson 1996-2022 was 1.2 percent per year compared to 1.3 percent per year in New Zealand as a whole. Therefore, Nelson’s growth rate was below the national average for this period, not above.

OUR NELSON goes on to state that the Council is “...expecting approximately 27 percent growth in population over the period 2020-2051. This means that by 2051 the population is estimated to

<sup>1</sup> See: <http://nzdotstat.stats.govt.nz/wbos/Index.aspx?DataSetCode=TABLECODE7512#>

increase by an additional 11,680 people”. OUR NELSON does not give the source of this statistic but it is apparent that it derives from the Council’s **Housing and Business Capacity Assessment** (July, 2021, p. 18). (See reference No 4). OUR NELSON has confused the growth of population with the growth of **households** The 27 percent figure refers to the growth of households (Table 5), not population (Table 4). The error is actually in the wording contained in the HBA itself (p.18), and OUR NELSON has simply reproduced it.

The actual percentage increase in **population** can be calculated from HBA Table 4, where it shows that the 2020 population was 54,620 and the projected population in 2051 is 66,480. The difference is:  $66,480 - 54,620 = 11,860$ . The actual percentage increase indicated by these numbers is **22 percent** when calculated by a simple arithmetic method, or **20 percent** when calculated by the method preferred by demographers—using natural logarithms.

Another anomaly in OUR NELSON (16 August, 2023) is the estimated number of households expected on the basis of a population increase of 11,860. This is given as 6,470, which is 1.8 persons per household. Since the number of households has been calculated on the basis of 2.3 persons per household up to 2028 and 2.2 persons thereafter, the increase in population and the increase in households should also be somewhere between 2.2 and 2.3. The problem appears to lie in the period 2027-2030 (inclusive) when the number of households is increasing at a faster rate than the population. This should not happen, but I am unable to identify the cause of the problem. The result is probably to increase the number of households that would need housing in the long term.

Are these differences and anomalies important? This depends on the context in which these figures are used. In the context of the announcement of plan change 29, publishing a higher percentage population growth rate than is warranted has the effect of over-stating future population increase and therefore exaggerating the need for Plan Change 29. Also, when local governments and territorial authorities are competing for funds from the central government, a difference of 7 percentage points may well be highly significant. Overstating the number of households in the future would also have the effect of exaggerating the need for Plan Change 29.

The NCC and its officials appear to frequently exaggerate both past and future population growth in Nelson. One method of doing this is to add Tasman and Nelson’s population together and present the number as if it applied to Nelson alone. This is not legitimate in the context of Plan Change 29, which only applies to the Nelson urban area, not Tasman District. Furthermore, Tasman’s demography is different from Nelson’s. For example, Tasman has had higher in-migration in recent years and is an older population than Nelson’s.

Another method used by NCC to create false impressions is the through the construction of misleading graphs. The following graph (Figure 1) was published in the **Nelson-Tasman Future Development Strategy Technical Report** (See Reference No. 7) and has been used by Council staff to justify Plan Change 29 on the grounds of population growth.

**Figure 1**

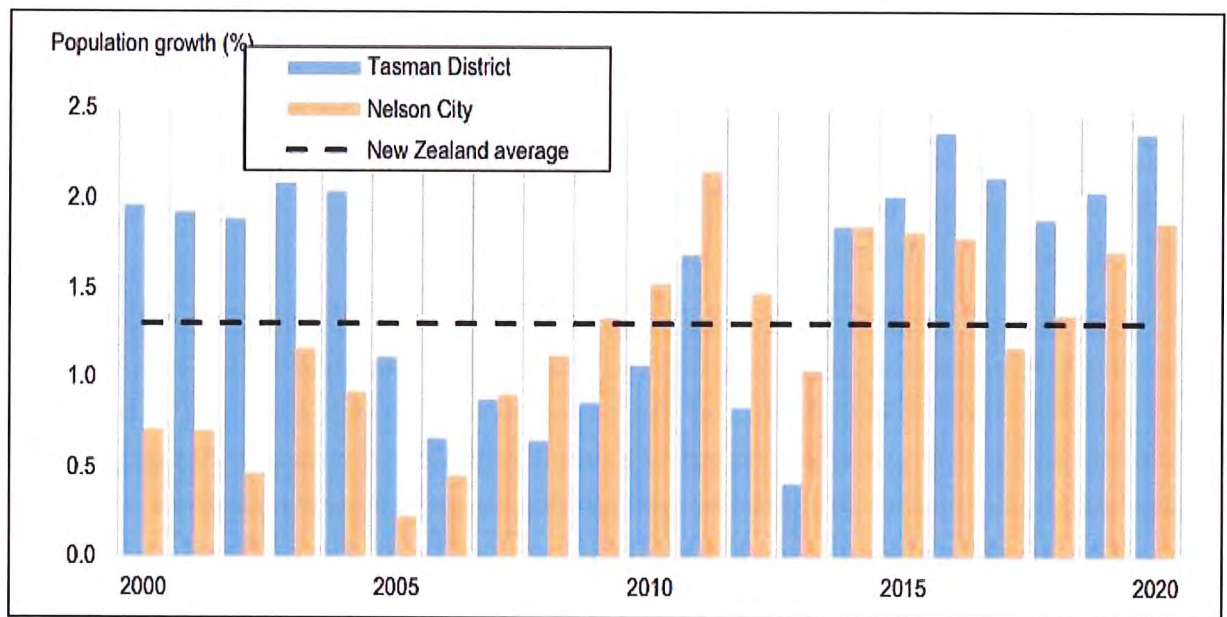
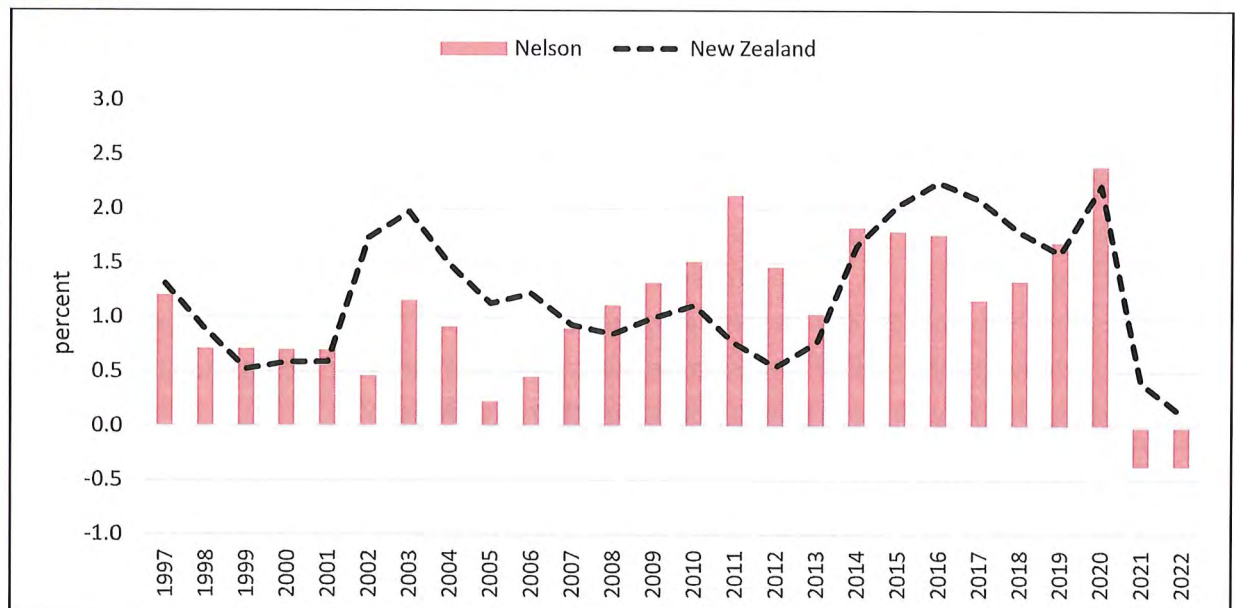


Figure 1 Showing historic population growth in Nelson and Tasman (Source: Nelson and Tasman combined Housing and Business Assessment 2021).

Figure 1 is misleading because it shows the national growth rate as a straight line, whereas the population growth rate in New Zealand varies year to year, just as Nelson's growth rate does. The correct way to construct a graph of this type is shown in the second graph (Figure 2) below (showing Nelson only without Tasman). This graph shows that the national growth rate fluctuates in a different pattern than Nelson's and in certain periods one can be higher or lower than the other. During the period 2001-2006, for example, Nelson's growth rate was significantly lower than the national average. In other periods it has been higher. The two rates are not closely related.

Figure 2



Source: <http://nzdotstat.stats.govt.nz/wbos/Index.aspx?DataSetCode=TABLECODE7512#>

This point is well-illustrated by the latest population growth estimates for the year-ending June 2023. While growth in New Zealand and Nelson has been boosted by an unexpected increase in net international migration during the year 2022-23, New Zealand's population increased by 2.1 percent while Nelson's increased by 1.2 percent. The latter rate is the same as Nelson's average growth over the past two decades, whereas New Zealand's rate is significantly higher.

(b) Population projections using a seriously flawed methodology. The **National Policy Statement on Urban Development (NPSUD)** and its companion document **National Policy Statement on Urban Development Capacity: Guide on Evidence and Monitoring (NPSUDC-Guide)** (See References item 1 and 2, respectively), specify the methods and procedures that local authorities are required to follow when developing population projections for the purpose of formulating Housing and Business Assessment (HBA) and related plans such as a Future Development Strategy (FDS).

*Every HBA must:*

- (a) set out a range of projections of demand for housing in the short term, medium term, and long term; and*
- (b) identify which of the projections are the most likely in each of the short term, medium term, and long term; and*
- (c) set out the assumptions underpinning the different projections and the reason for selecting the most likely; and*
- (d) if those assumptions involve a high level of uncertainty, the nature and potential effects of that uncertainty.*

(NPSUD May 2022 p.23, Reference No. 1)

Further guidance on methodology is provided by the NPSUDC **Guide on Evidence and Monitoring:** (See reference No. 2).

### **“2.1.2 Using Statistics NZ or alternative sources of population and household projections**

In assessing demand for housing, Policy PB2 a) requires assessments to use, as a starting point, the most recent Statistics New Zealand population projections. Consistent with this:

- Assessments for high growth urban areas, due at the end of 2017, could estimate growth in the total number of households, by applying the ratios between the previous set of population and household projections (both published in 2015), for each 5-year period, to the most recent Statistics New Zealand's population projections.
- Assessments for medium growth urban areas, due at the end of 2018, could use Statistics New Zealand household estimates to be published in December 2017.

There are several advantages to using Statistics NZ's projections:

- The projection methodology is applied consistently across territorial authority areas.
- Projections are regularly reproduced over time using consistent and internationally-accepted methods, rather than on an ad hoc basis.

- The projections are produced by an independent agency with access to the most comprehensive data inputs.

In some cases, a local authority may want to commission its own bespoke projections from another provider. The rationale for choosing to augment, or depart from, the Statistics NZ projections should be explained in the assessment in a way that can be traced and audited.

Local authorities that jointly produce a housing and business development capacity assessment need to agree on the source, methodology and assumptions for the projections used for the study area and constituent territorial authorities. These would desirably also be consistent with the projections that they use in their long term plans and infrastructure strategies prepared under the Local Government Act 2002” (p.23).

Further guidance to councils and territorial authorities is provided under the heading “Dealing with uncertainty”. (p.30)

“One way that Statistics NZ addresses uncertainty is to provide three projection scenarios – **low, medium and high growth** – for each geographic area to illustrate a range of possible scenarios. At the time of release, Statistics New Zealand considers the medium projection the most suitable for assessing future population and household changes. The medium series is consistent with the median projection (50th percentile) of the national population projections.”

***“Should a local authority wish to depart from using a medium projection, the rationale should be explained in a way that can be traced and audited.”*** (italics and bold added).

In summary, the NPSUD and the NPSUDC Guide on Evidence and Monitoring express a very clear preference that Local Authorities use the regular population projections developed by Statistics NZ when developing FDS and HBA and related plans. However, the option of commissioning “bespoke” projections from another “provider” is permitted, providing that the Local Authority presents a valid rationale for doing so and that the assumptions employed in a bespoke projection series are stated transparently such that the effects can be “traced and audited.” That is, any bespoke projection series should follow the same principles as Statistics NZ follows in its own projections.

**It is the contention of this submission that the Nelson City Council’s “bespoke” projection does not meet the requirements of the NPSUD and the NPSUDC Guide on Evidence and Monitoring. The basis of this contention is provided in the following section.**

(c) The NCC’s report Population Growth and Demographics (see Reference No. 3) does not meet the requirements of the NPSUD and the NPSUD Guide on Evidence and Methodology. Therefore, the projection contained therein is not a valid basis for the NCC’s FDS, HBA, or proposed Plan Change 29.

First, the NCC did not commission “another provider”, as permitted under the NPSUD, but rather did an “in-house” exercise and only later sought technical advice. The NCC Population and Demographics Report does not ***“set out the assumptions underpinning the different projections and the reason for selecting the most likely”*** but rather describes the outputs from various Statistics NZ projections that the NCC has bundled together to create a single projection, which is then compared with actual projections conducted by Statistics NZ. The NCC Report misunderstands the meaning of an

“assumption” in the context of population projections. Assumptions are the **inputs** that generate a projection of future population. The inputs required to do a population projection are:

- 1) A base population
- 2) Age-specific fertility rates for women aged 15-49
- 3) The Total Fertility Rate
- 4) The sex ratio of births
- 5) Age and sex-specific mortality rates (survival ratios)
- 6) Age and sex-specific net migration rates (or proportions)

The NCC Report does provide a base population, but does not explain or present the other assumptions normally required to do a population projection. As a consequence, the NCC’s projection cannot be **“traced and audited”**, as required by the NPSUD Guide on Evidence and Monitoring (Reference No. 2, p.28).

In an Official Information Request to the Nelson City Council, the present submitter asked the NCC why it had not commissioned “another provider” to produce a “bespoke” projection series as allowed for in the NPSUD. The Council replied that:

**In the experience of the officers that were involved in this decision, the relatively complex models that traditional demographers use are not easy for elected officials and the general public to interrogate and understand. In particular, linking the effects of a likely COVID19 related recession to population change is a topic that it was felt may not be communicated appropriately.** (Reference No. 16).

The first part of this response is quite obviously incorrect, given that NCC has previously commissioned projections using the methods of “traditional demographers” and has subsequently, in 2022 or 2023, commissioned another projection using normal demographic methods<sup>2</sup>. These methods refer to what is known as the “cohort-component” method, in which rates of births, deaths and migration are applied independently to a base population in a continuous iteration. This is not simply a “traditional” method but the **ONLY** valid method of doing a population projection—other than a simple mathematical extrapolation of a growth rate.

As regards the issue of incorporating the possible economic impact of the COVID-19 pandemic, it is a standard caveat of all population projections that they do not take account of natural disasters, epidemics, wars or economic cycles. While an assessment of the economic impact of a pandemic such as COVID-19 is perhaps a useful or interesting exercise, it is not possible to predict the impact or the progression of any economic effects or to quantify the impact on population.

In any case, the advent of COVID-19 does not preclude the use of “traditional methods” to model the possible consequences. Any qualified “provider” could have produced a set of projections reflecting the uncertainty associated with such a rare event. The use of a “hybrid” method is not an obvious procedure nor a necessary one under these circumstances. New

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<sup>2</sup> See Reference list No 10.

Zealand's "recession" during the COVID-19 period was in any case very brief and under some definitions would hardly qualify as a recession. While GDP dropped by 12.2 percent in the June quarter of 2020, economic growth during the year was up by 0.4 percent and unemployment dropped to 4.9 percent. In other words, the recession was short and sharp.

Reference No. 17 (*A note on the hybrid population projection developed by Nelson City Council for the purpose of its Long Term Plan, HBA and Housing Bottom Line*) lays out in more detail the shortcomings of NCC's "hybrid" projection in terms of the requirements of the NPSUD.

As regards the actual "method" employed by the NCC, a detailed demographic assessment is contained in Reference No. 18, which reports the comments of New Zealand's foremost regional demographer. The key conclusion by Professor Jackson is as follows:

**There are few words to describe the audacity of this modelling.** The narrative outlining the 'projection methodology' identifies that the numbers selectively chosen from Statistics New Zealand's *output* are disturbingly ignorant of the underlying assumptions used to produce them, namely high, medium or low fertility rates and age distribution of mothers; high, medium and low survivorship rates and associated life expectancy by age and sex and migration by age and sex.... (Reference No. 18, p.1).

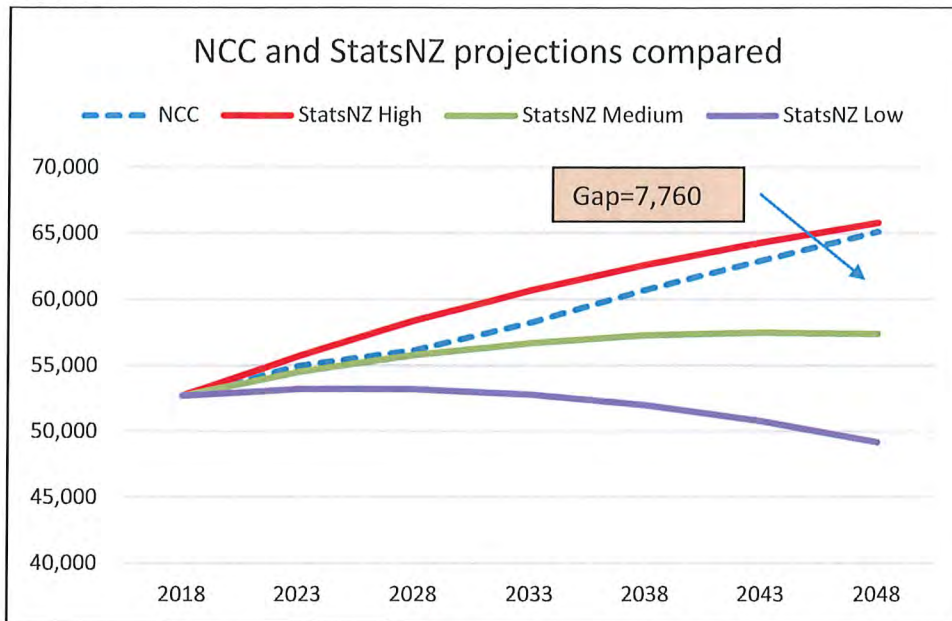
The 'hybrid' population projections and subsequent housing 'demand' NCC proposes to adopt are inherently flawed. Population numbers are 'cherry picked' across the output from three projection variants produced by Statistics New Zealand, with no understanding of the underlying input assumptions and how they may interact with future growth or decline. They have no tenable demographic foundation, and instead are based almost solely on economic (recessionary) considerations (p.3).

The principles of good governance (transparency and evidence-based decision-making) would suggest that a population projection that has been subject to such severe criticism should not be used for serious planning purposes, especially for a "once in a generation" decision such as Plan Change 29.

Note another point made in Professor Jackson's review. That the projections "were reviewed and seemingly endorsed by infometrics 'with minor adjustments' ... adds to the culpability of both NCC and Infometrics if it is decided by NCC to adopt the projections". (For Infometrics responses to the NCC's draft projection report and their recommended adjustments, see Reference 16d and 16e).

(d) What difference does it make? The flaws in the NCC's population projection would not be of great importance if the difference between that projection and the available alternatives from Statistics NZ were small. In the medium- and long-term, however, the differences are large. The graph below (Figure 3) shows the NCC's projection plotted against Statistics NZ's three projection variants (updated to 2023).

**Figure 3**



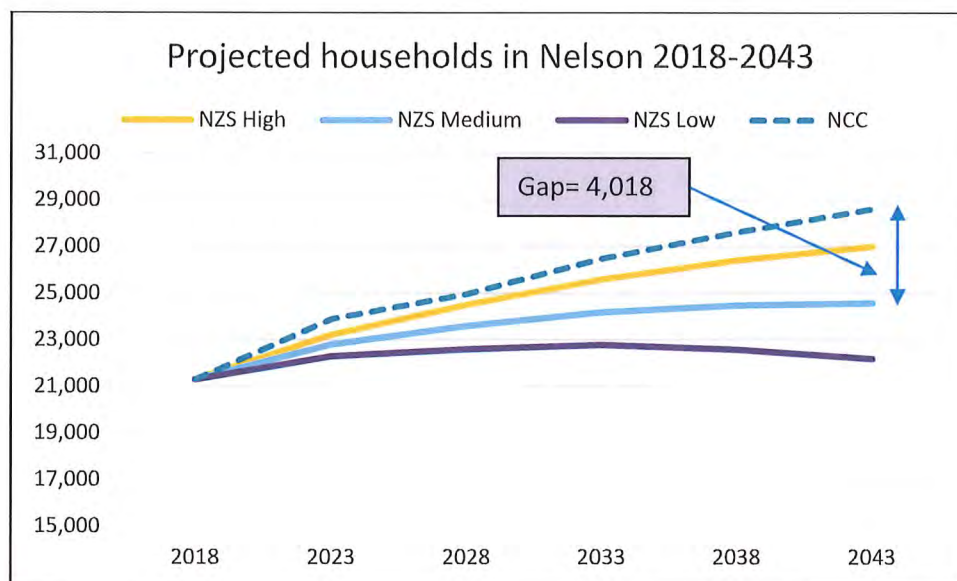
Sources: Reference No. 3; Statistics NZ ([Dataset: Subnational population projections, by age and sex, 2018\(base\)-2048 updates](#)).

Up to 2028, the NCC projections tracks just above the Statistics NZ “medium” projection, updated to a 2018 base (2023 release). By 2048 (the final year of Statistics NZ’s projections, the difference has expanded to 7,760. In other words, the NCC is projecting population increase over this period of 12,460, whereas under Statistics NZ’s “medium” projection, growth would be 4,700. The difference of 7,760 is far from trivial. Converted to households at the NCC’s suggested ratio of 2.2 persons per household (see Reference No.4, p.18), the difference represents about 3,300 additional households in need of accommodation (dwellings).

***It is the contention of this submission that this gap is significant in terms of the purpose for which population projections are to be used under the NPSUD. The gap between Statistics NZ’s medium projection and the NCC’s projection is too wide to be accepted for planning purposes. Consequently, we contend that the NCC projection is not fit for purpose.***

(e) Household projections: NCC and Statistics NZ compared. In terms of the demand for housing, the projected number of households is the key variable. Here again there is a wide discrepancy between Statistics NZ’s projection of households and the NCC’s. The following graph shows that Statistics NZ’s medium projection indicates that there would be 3,300 additional households in Nelson by 2048, whereas the NCC’s projection indicates that there would be 7,318, creating a gap of 4,018 households.

**Figure 4**



Source: Reference No. 3; Statistics New Zealand, [Dataset: Statistical area 2 \(SA2\) household projections, 2018\(base\)-2043](#)

Once again, we contend that the gap between Statistics NZ’s medium projection is too wide to be credible. The NCC is projecting that there would be 28,618 households in Nelson by 2048, whereas Statistics NZ is projecting 24,600. The difference between these projections is not a trivial number, and would make a major difference in terms of the number of dwellings that would be needed in Nelson over the long term.

**Given the criticism that the NCC projection report has received from qualified experts, we argue that the projection cannot be used to estimate future households—hence the future demand for housing.**

(f) The application of the “competitiveness margin” is a cause of confusion. The NPSUD requires councils and territorial authorities to add to the demand for housing a “margin” of 20 percent (in the short and medium term) and 15 percent in the long term. The NCC has applied these margins to the estimated demand for households based on their population projection. The NPSUD also requires councils to estimate the “unmet demand” represented by households living in overcrowded homes, transitional housing, living with relatives and related indicators of under-housing. When the “unmet demand” (estimated to be 217 households) and the competitiveness margins are added, the total demand for housing by 2051 is estimated to be equivalent to 8,025 households.

The HBA for Nelson proceeds to treat 8,025 as if it were the number of new dwellings that would need to be built to meet the demand of population growth and the existing unmet demand. As the report by M.e points out (Reference No. 16c, p.1) the actual number of dwellings required to meet future demand is “...more likely to be closer to 6,900 additional dwellings...” by 2051, not 8,000.

In other words, the “competitiveness margin” is intended for a quite different purpose, namely the functioning of the land and house market; it does not reflect **actual** demand. This is extremely important, because the HBA (p.40) indicates that **“Nelson has capacity for 7,160 new houses over the next 30 years”**. If actual demand (using NCC’s own flawed projection) net of the competitiveness margin is 6,900 dwellings, and current capacity is for 7,200 dwellings, then there is **no shortfall in supply**. If there is no shortfall in supply, then the need for PC29 is being overstated. This is pointed out by the M.e Report, which states:

**The long-term projected demand is substantially higher than the most recent Statistics New Zealand (SNZ) high series projections, meaning that the sufficiency assessment is conservative and likely to overstate any expected shortfalls in capacity (p.1).**

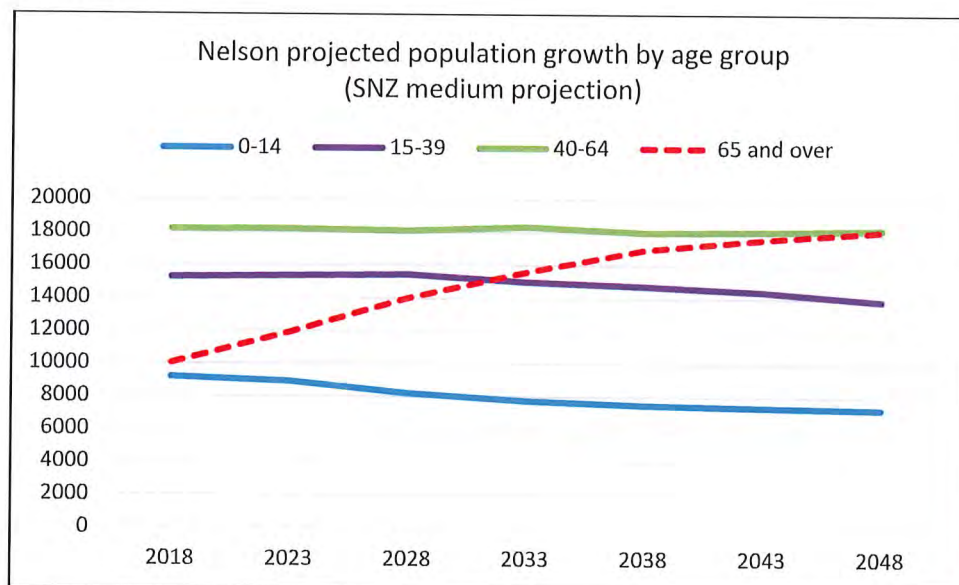
Note that the determination that any shortfalls in capacity are likely overstated, is with reference to Statistics NZ’s “high” projection. If Statistics NZ’s “medium” projection is employed then the “expected shortfalls” in capacity would be overstated by an even larger margin. Under Statistics NZ’s “medium” projection, 3,300 additional households would be required to be housed by 2048 and no additional demand up to 2051. If this projection turned out to be corrected, then Nelson has sufficient capacity not only for the next 30 years but also well beyond. The HBA estimates that the demand for “standalone” homes in the long term is 5,200—including the 20 percent competitiveness margin. This need could easily be met by the presently available capacity.

Even with the NCC’s inflated population and household projections, already identified capacity is sufficient to 2039—16 years away. With a more realistic projection, capacity would be sufficient beyond 2051.

(g) Age structure is the crucial dimension in regard to housing demand. Regardless of which population projection is used, the future population of Nelson will be older than the current population. As the graph below shows, the population aged 65 and over already exceeded the population aged 0-14 by 2018. In future, only the 65 and over population will grow, whereas all age groups below 65 will slowly decline. These growth patterns have important implications for housing demand—especially the type of housing needed. The NCC’s own projection report acknowledges this and includes a graph which is similar to Figure 5 (see next page). The NCC’s Housing and Business Assessment (HBA) acknowledges that more one- and two-bedroom homes will be required in the future (See Reference No. 4).

Unfortunately, the “Nelson-Tasman Housing We’d Choose” study of housing preferences (Reference No. 16a) paid no attention at all to the issue of ageing, which is the most important dimension of Nelson’s population in the future.

**Figure 5**



Source: Statistics New Zealand, <https://www.stats.govt.nz/information-releases/subnational-population-projections-2018base2048> (2023 revision)

It is important to note that the Nelson City Council had previously paid more attention to ageing in Nelson. A report published by the Council in 2017 (See reference No.15) provided details of housing preferences across all age groups from 18 years to 80 and older. The type of property preferred by “baby boomers” (aged 70-79 years) would have the following characteristics: “sunny, low maintenance with at least two bedrooms and a garage, on a flat section close to services”. When listing the features that the population of Nelson prefer (no breakdown by age), the NCC’s HBA omits two important preferences: adequate garage or off-street parking and an easy to maintain section.

(h) New projections prepared for Nelson and Tasman Councils in 2023. The Tasman District Council and the Nelson City Council have jointly commissioned a new set of population projections from a consulting firm (DOT Consulting). The report on these projections is dated March 2023 (See reference No. 10). The existence of this report is acknowledged by Tasman District Council in attachments to its agenda for a Council meeting on 27 April, 2023 (Reference 16b) and the results are already being used for planning purposes in Tasman. Despite intensive searching, I can find no mention of the report of these projections on the Nelson City Webpage, nor in media reports. On inquiry with the Environmental Planning section of NCC, it was stated that:

***The Tasman District Council and Nelson City Council Population Projections 2018 - 2058 Results'*** (March 2023) from DT Consulting was finalised in March of 2023. As the report was finalised after PC29 was released to statutory agencies the findings from the report were not included PC29 and its associated appendices [sic].

The findings from the report will be used to update the Housing and Business Development Capacity Assessment – which is a requirement under the NPS-UD. The findings from this report will also be used to inform the PC29 as it is modified in response to submissions.

(email from [environmental.planning@ncc.govt.nz](mailto:environmental.planning@ncc.govt.nz) (13 October, 2023)

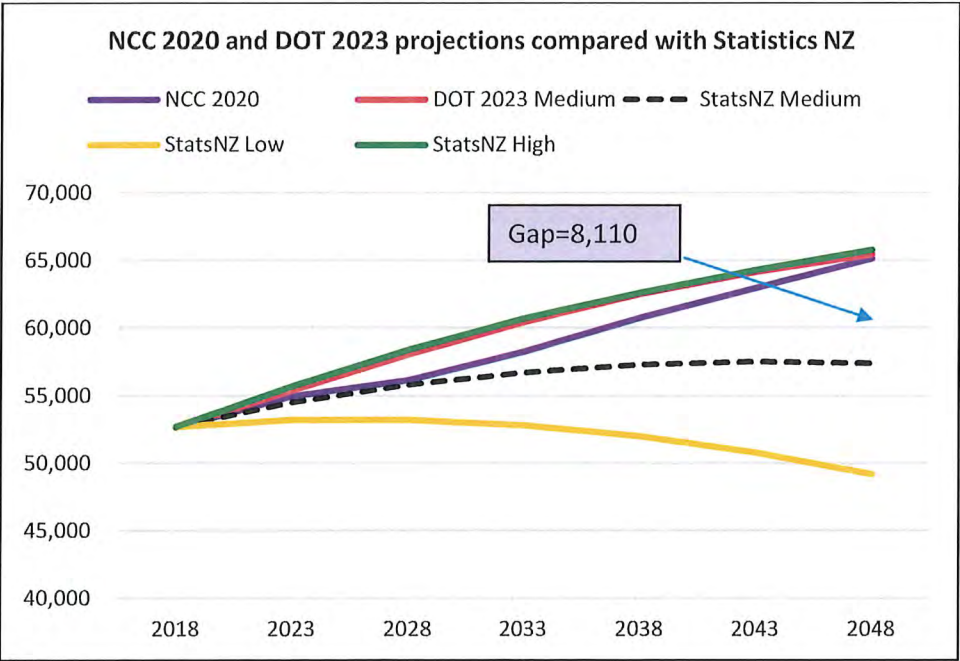
That the NCC has had this report in its possession since at least March 2023 and not released it to the public, or otherwise mentioned it in the context of Plan Change 29, is a matter of great concern. The Council has indicated in the email quoted above that the report is relevant to Plan Change 29, but has prevented any discussion of its implications in public meetings or other deliberations by not releasing it. Rather, the NCC is planning to use this report only **after** public submissions have been made. In the meantime, the report is being kept “under wraps”.

**In the opinion of this submitter, this lack of transparency is unacceptable and contrary to the principles of “good governance” and participatory democracy.** Opportunity must be given for the DOT consulting projections to be reviewed and scrutinized by qualified experts before they are used for any planning purposes, including Plan Change 29.

A preliminary review by this submitter (a qualified demographer) is that the DOT report is a major improvement on the projections used in Nelson’s FDS and HBA and being used to justify Plan Change 29. So far as one can tell from the report, the methodology employed is sound. The difficulty that arises is that the DOT projections result in a similar gap between Statistics NZ’s medium projection and the DOT medium projection. The differences can be seen in Figure 6.

The gap between DOT’s medium projection and Statistics NZ’s medium projection is just as wide as it was using the NCC’s own “bespoke” projection. Assuming that there are no calculation errors in DOT’s work, and given that DOT employs the same fertility and mortality assumptions as Statistics NZ, the difference between the two projections lies in the higher net migration assumptions used in the DOT projections. Table 1 (next page) compares the two sets of assumptions, with DOT assuming net in-migration of 464 persons per year on average and Statistics NZ assuming 300 per year.

Figure 6



Sources: Reference list Nos. 3 and 10.

<https://nzdotstat.stats.govt.nz/wbos/Index.aspx?DataSetCode=TABLECODE7988>

How significant is the difference between Statistics NZ and DOT's net migration assumptions? What difference does it make for Nelson's age structure? The answer can be seen in Figure 7, where it is apparent that there are only small differences between Statistics NZ's medium projection and DOT's medium projection in the younger (0-14) and older (65+) age groups but a very large difference in the working age range of 15-64.

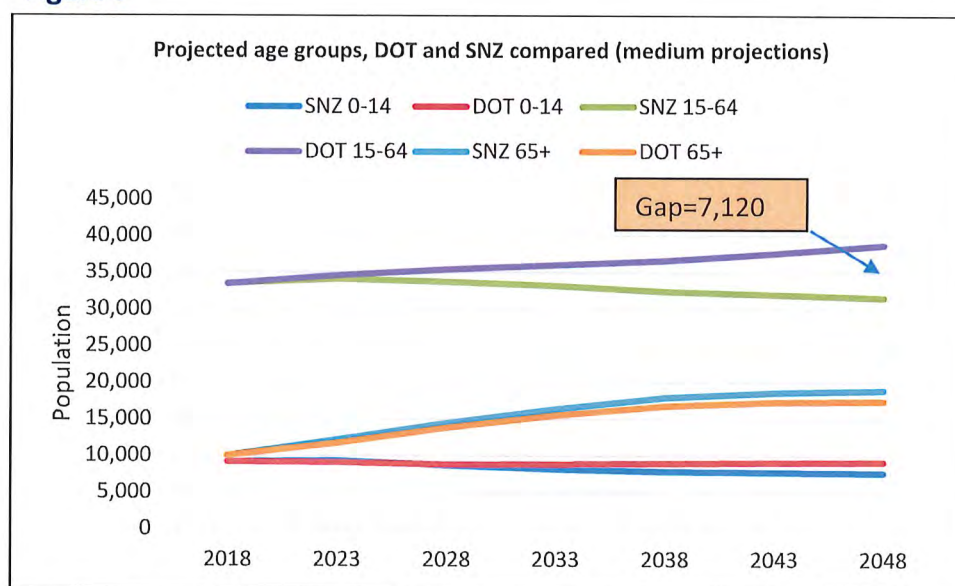
**Table 1: Migration assumptions 2018-2048**

| Period    | DOT Medium | Statistics NZ Medium |
|-----------|------------|----------------------|
| 2018-2023 | 2,137      | 1,500                |
| 2023-2028 | 2,257      | 1,500                |
| 2028-2033 | 2,283      | 1,500                |
| 2033-2038 | 2,414      | 1,500                |
| 2038-2043 | 2,418      | 1,500                |
| 2043-2048 | 2,418      | 1,500                |
| Total     | 13,927     | 9,000                |

Sources: Reference No. 10; Statistics NZ. <https://www.stats.govt.nz/information-releases/subnational-population-projections-2018base2048> (2023 revision)

The difference in the total projected population up to 2048 between the two projections appears to be entirely due to higher assumed net migration in the working age range of 15-64.

**Figure 7**



Source: See Table 1 sources.

It is the argument of this submission that the migration assumptions contained in the DOT projection should **be further assessed before the DOT projections are used in connection with Plan Change 29 or for other planning purposes**. Further investigation is needed in the difference between the age distribution of migration used by Statistics NZ, and that used by DOT—as per the instructions given to it by NCC—as well as the justification for DOT's higher total migration assumptions.

### PART 3: THE PROPOSAL TO MAKE ATAWHAI NORTH OF TUI GLEN ROAD 'MEDIUM DENSITY'

Certain areas of Atawhai North of Tui Glen Road (map unavailable in the Council Offices) are scheduled to be re-zoned under PC29 to medium density. This density, as I understand it, would allow for three housing units (dwellings?) per section up to a height of 12 metres, without any requirement for the owner or developer to seek resource consent or the agreement of neighbours. Furthermore, the structure could be built up to one metre from the boundary line. That is, a three-storey block could be built under PC29 "as of right", and no neighbour or co-resident would be able to have any say in the matter.

#### **I do not support this aspect of the PC29 proposal on the following grounds:**

1. Atawhai **infrastructure cannot** support this type of intensification, especially roading. The roads in this part of Atawhai are too narrow to accommodate additional traffic. That includes street-based parking. Under PC29 on-site parking will not be necessary, or even permitted. It is not feasible to have resident parking on both sides of the street as that would leave only one lane clear, which is potentially dangerous when vehicles are traveling in both directions. Citizens of Nelson have expressed a preference for houses with off-street parking (See: The Housing We'd Choose, Reference No. 16a). Atawhai was developed under rules that required garaging or off-street parking. Those rules should remain in place.
2. Intensification would also **place more traffic on State Highway 6**, which is already busy enough. SH6 already generates significant acoustical pollution, especially from heavy trucks and most particularly logging trucks. Additional commuter traffic will only add to this. Waka Kotahi are not interested (apparently) in mitigating the noise pollution from SH6 either by repaving with a smoother surface or compensating residents along this route for investing in double glazing and mechanical ventilation. Atawhai North has never been properly developed with a local shopping area. So other than for some basic supermarket shopping, residents have to drive to the CBD. Only a small minority of people will take the bus either for shopping or work. Cycling is a recreational activity, not suitable for commuting.
3. **Sun angles are crucial** in Atawhai due to its East-to-West slopes. Building up another floor or two would prevent sunlight reaching some homes downhill from receiving sunlight until the afternoon. This has implications for home heating, as most people want to minimize their use of heating devices and to gain as much solar heat as possible. This is especially the case for fixed-income pensioners.
4. **Sea views are another reason that Atawhai is an attractive destination.** Under intensification, some homeowners could lose their views. This would constitute a significant loss of amenity.
5. **Some areas in Atawhai may be suitable for some intensification**, but this should be done on an ad hoc basis and require resource consent to protect amenity values that attracted people to Atawhai in the first place.

6. **Intensification in Atawhai would have no impact on affordability**, as household incomes are probably at or above the average for Nelson. There may be scope for low-income housing but it would need to be well-designed so as to avoid a concentration of poor or low income households. Only Kainga Ora can provide affordable housing for low or moderate income households.
7. **In general, intensification in Atawhai (as elsewhere in Nelson) needs to be BY DESIGN and not driven by developers.** That means that improved access to local shopping—removing the need to go to town—is crucial.
8. **Infill housing should be permitted, subject to the current resource consent requirements.** I do not object to infill housing where it is suitable and doesn't detract from amenity values.
9. **Intensification should focus mainly in the Nelson CBD fringe area before considering suburbs like Atawhai.** In particular, the area between Vanguard Street and St Vincent Street from Gloucester to Northesk Street is suitable for **transition to low rise and possibly some higher apartment blocks**. This area should be re-zoned for this purpose as soon as possible. Council needs to form a land accumulation company to facilitate redevelopment of this area and reduce the focus on light commercial. But green space requirements are crucial if this area is to be intensified.

#### WHAT DO I WANT COUNCIL TO DO?

- 1) **Withdraw PC 29** and undertake revisions based on community input;
- 2) Atawhai to remain a General Residential Zone;
- 3) Put a revised PC29 out for further consultation and ensure that all essential documentation is available to ALL citizens, residents and ratepayers;
- 4) **Stop** using the NCC's flawed population projections of 2020 as a planning tool. Cease using this projection for the next FDS or in support of plan changes such as PC29;
- 5) Immediately **release the population projections prepared by DOT consulting** for public scrutiny and expert commentary;
- 6) Arrange for a **peer review** of the projections carried out by DOT under contract to the NCC by qualified specialists. Specifically, the peer review should focus on the migration assumptions employed by DOT under direction from NCC. Form a working group of economists and other social scientist along with business and community representatives and the Nelson Development Agency to formulate a more realistic set of migration assumptions based on the economic development prospects for Nelson;
- 7) Only after a peer review, prepare a new HBL using a set of projections supported by a consensus of experts and community representatives. Ensure that the "competitive margin" is applied correctly and transparently.

## REFERENCES CITED

### A. Nelson City Council and Government Documents (available online)

1. **National Policy Statement on Urban Development 2020** (Updated May, 2022). New Zealand Government.
2. **National Policy Statement on Urban Development Capacity: Guide on Evidence and Monitoring** (2107) NZ Government, Ministry for the Environment and Ministry of Business, Innovation and Employment.
3. **Population Growth and Demographics** (2021). Nelson City Council. Attachment 1 A2578160. Housing and Business Capacity Assessment for Nelson City and Nelson-Tasman's urban environment.
4. **Housing and Business Capacity Assessment** (July, 2021) Nelson City Council. Attachment 1 – A 2578160.
5. **National Policy Statement on Urban Development**. Nelson and Tasman Tier 2 Urban environment: Housing and Business Assessment (July 2021). Nelson City Council and Tasman District Council.
6. **Nelson Tasman Future Development Strategy 2022-2052**. (19 September 2022) Nelson City Council.
7. **Nelson Tasman Future Development Strategy 2022-2052. Technical Report** (19 September 2022) Nelson City Council.
8. **Nelson-Tasman FDS: Technical Background Report** (June 2019). Tasman District Council and Nelson City Council.
9. **National Policy Statement on Urban Development: Nelson-Tasman Joint Monitoring Report**. (June 2021)
10. **Population Projections 2018-2058 Results**. (March 2023). Tasman District Council and Nelson City Council and DOT Consulting.
11. **OUR NELSON**, 16/08/2023, "Housing Plan Change 29" (p.6). Nelson City Council.
12. **OUR NELSON**, 13 September 2023, "Mayor's message", (P.5).
13. **Minutes** of an Ordinary Meeting of the Nelson City Council, 12 November, 2020, Agenda Item 12.
14. **Attachment** to agenda of Council Meeting of 12 November 2020, Report No. R15907 and attachment 1 Population Growth and Demographics.
15. **Nelson's Ageing Population**. Background Paper (February, 2017). Nelson City Council.
16. **Response to LGOIMA Request**. Letter from Clare Barton (November 2021) with attachments. Council Ref: SR 2145516. See: [https://www.nelson.govt.nz/assets/Our-council/Downloads/official-information/lgoima-responses/2021/LGOIMA-Population-Growth-and-Demographics-24NOV2021\\_Redacted-Strategic-Planning-and-Policy.pdf](https://www.nelson.govt.nz/assets/Our-council/Downloads/official-information/lgoima-responses/2021/LGOIMA-Population-Growth-and-Demographics-24NOV2021_Redacted-Strategic-Planning-and-Policy.pdf)
- 16a **Nelson-Tasman Housing We'd Choose: Housing Demand Preferences**. M-e Consulting. June 2021.
- 16b **Attachments to Agenda** of Tasman District Council Meeting of 27 April, 2023. Attachment 8.4, p.144.
- 16c **Nelson City Housing Plan Change – Economic Assessment**, 16 May 2023, M.e Consulting.
- 16d **Review of post COVID population projection for Nelson City Council**, June 2020, Infometrics. (See online reference No. 16)

16e **Effect of COVID-19 on Nelson's Population Outlook, for Nelson City Council**, February, 2021.  
Infometrics (See online reference No. 16)

B. Other documents (attached to emailed and hard copy)

17. A Note on the "hybrid" population projections developed by the Nelson City Council for the purposes of its Long Term Plan, HBA and Housing Bottom Line, Geoffrey Hayes (Dr) November, 2021. (attached)
18. "Comments on the Nelson City Council's Report 'Population Growth and Demographics', Natalie Jackson (Dr), Natalie Jackson Demographics, 17 November 2021.
19. "A Note on Nelson's Population Growth", Geoffrey Hayes (Dr), August 2023.

**Long Term Plan and Activity Management Plans 2021**

# **Population Growth and Demographics**

**Nelson City Council**

## Executive Summary

The purpose of this report is to present a population projection for use in developing Nelson City Councils Asset Management Plans and Long Term Plan. Traditionally, Statistics New Zealand would provide high, medium and low scenarios for Councils to use. In 2018, the latest census was completed but due to shortcomings in the move to online forms the return rate was lower than previously experienced. As a result, there has been significant delays in Statistics New Zealand providing updated population projections.

The COVID19 event is expected to have significant immediate and future economic effects particularly as it restricts the movement of people regionally and internationally.

In this context there is a lot of uncertainty involved with projecting future population change. To account for this a custom, or hybrid, population projection for Nelson has been developed. This report looks back at trends over previous recessionary periods to assist in developing rationale for choosing variables to develop the custom population projection.

It is recommended that the following assumptions inform a future population projection for Nelson:

- Medium births scenario for ten years
- High births scenario after that
- Medium deaths
- zero net migration for two years
- low net migration for the next three years
- medium net migration for the next five years
- high net migration after that

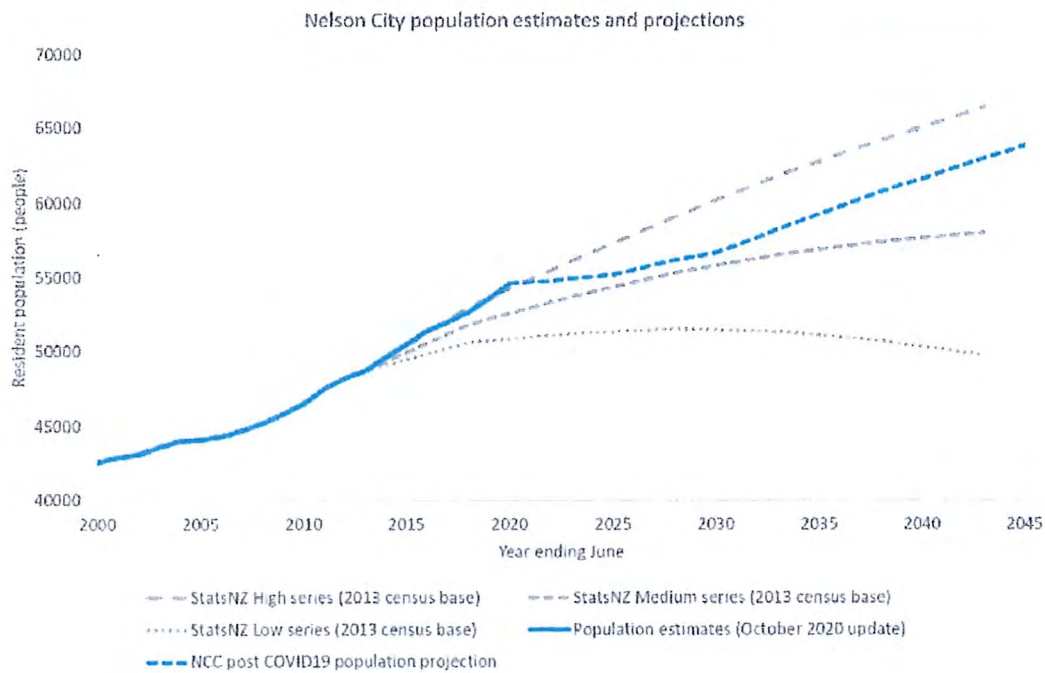
These assumptions result in a recommended population projection for use in developing the Asset Management Plans and Long Term Plan for 2021 as shown in the table below.

| Year | Projected population | Year | Projected population | Year | Projected population | Year | Projected population |
|------|----------------------|------|----------------------|------|----------------------|------|----------------------|
| 2020 | 54,620               | 2028 | 56,160               | 2036 | 59,760               | 2044 | 63,400               |
| 2021 | 54,700               | 2029 | 56,400               | 2037 | 60,260               | 2045 | 63,840               |
| 2022 | 54,780               | 2030 | 56,640               | 2038 | 60,760               | 2046 | 64,280               |
| 2023 | 54,960               | 2031 | 57,180               | 2039 | 61,200               | 2047 | 64,720               |
| 2024 | 55,080               | 2032 | 57,720               | 2040 | 61,640               | 2048 | 65,160               |
| 2025 | 55,200               | 2033 | 58,260               | 2041 | 62,080               | 2049 | 65,600               |
| 2026 | 55,520               | 2034 | 58,760               | 2042 | 62,520               | 2050 | 66,040               |
| 2027 | 55,840               | 2035 | 59,260               | 2043 | 62,960               |      |                      |

The starting population for the population projections in the table above has been adjusted to reflect the latest Nelson population estimates published by StatsNZ in October 2020. This adjustment has increased the population estimated in 2020 by around 1,600 residents compared to the figures presented in the draft of this report.

The figure below shows the recommended population projection in graphical form.

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It is clear from the figure above that the recommended projection is very low compared to the Statistics New Zealand high and medium series scenarios. The projection anticipates very low growth out until around 2025 before the rate of growth returns gradually to the high growth rate.

It is important to recognise that there is very significant uncertainty in any population projection as the short, medium and long term effects of the COVID19 event are not clear and are unlikely to be for some time. A precautionary approach is therefore recommended.

## 1.0 Introduction

- 1.1 This report provides the population and household projections recommended for use in the Nelson City Council Activity Management Plans and Long Term Plan for 2021. Predicting growth for the Long Term Plan and Asset Management Plans in 2021 has been made more complex by delays in receiving projections from Statistics New Zealand (StatsNZ) based on the 2018 census data.
- 1.2 With the release of 2018 census base projections delayed until at least December 2020, it has been necessary to utilise alternative methods for determining future population growth in Nelson. The following sections detail the methods used and the risks and uncertainty associated with using these methods and population projections in general.
- 1.3 Further complicating projecting the future population of Nelson is the COVID19 event. This report provides summary data and commentary on the recommended population projection and highlight the uncertainties and risks associated with that projection.
- 1.4 This report has been reviewed by Infometrics (a specialist economics and demographics consultancy) and the resulting population projection has been adjusted slightly to reflect the feedback received as part of the review process.
- 1.5 The projections have been updated with the 2020 StatsNZ population estimates that were released on 22 October 2020. These estimates set the starting point for the projections at a 2020 population of 54,620 people in Nelson City. This represents a higher starting point compared to the October 2019 population estimates as a result of StatsNZ having underestimated the population.

## 2.0 Uncertainty

- 2.1 Predicting future populations is an activity that involves uncertainty and risk. In particular, there is a lot of uncertainty around post COVID-19 economic performance, movement of people, and the timelines of both. This creates greater uncertainty than usual, especially when combined with the delay in receipt of StatsNZ population projections.
- 2.2 Given this uncertainty, it is important to understand the consequences of projections being incorrect and how they can be represented to make them as useful as possible.
- 2.3 Given this situation, it is considered appropriate to make some broad assumptions and understand the limitations of these assumptions rather than building a complicated model that is credited with a greater level of accuracy than it actually represents.
- 2.4 This report contains analysis, figures, and tables showing different date ranges. This is a limitation of the available data and needs to be acknowledged.
- 2.5 One of the ways that Council manages the risk of using incorrect population projections is through the annual plan process and the three yearly LTP process. Both of these processes enable projections to be updated yearly and three-yearly.

### 3.0 The Pre COVID19 population projections

#### Historical and current population

- 3.1 Every year, StatsNZ provides estimates of resident population for each territorial authority in New Zealand. The estimate is typically based on birth and death records as well as building consents and other indicative measures. The population estimates are validated every five years with census data. Figure 1 below shows the StatsNZ population estimates for Nelson City between 2000 and 2020.

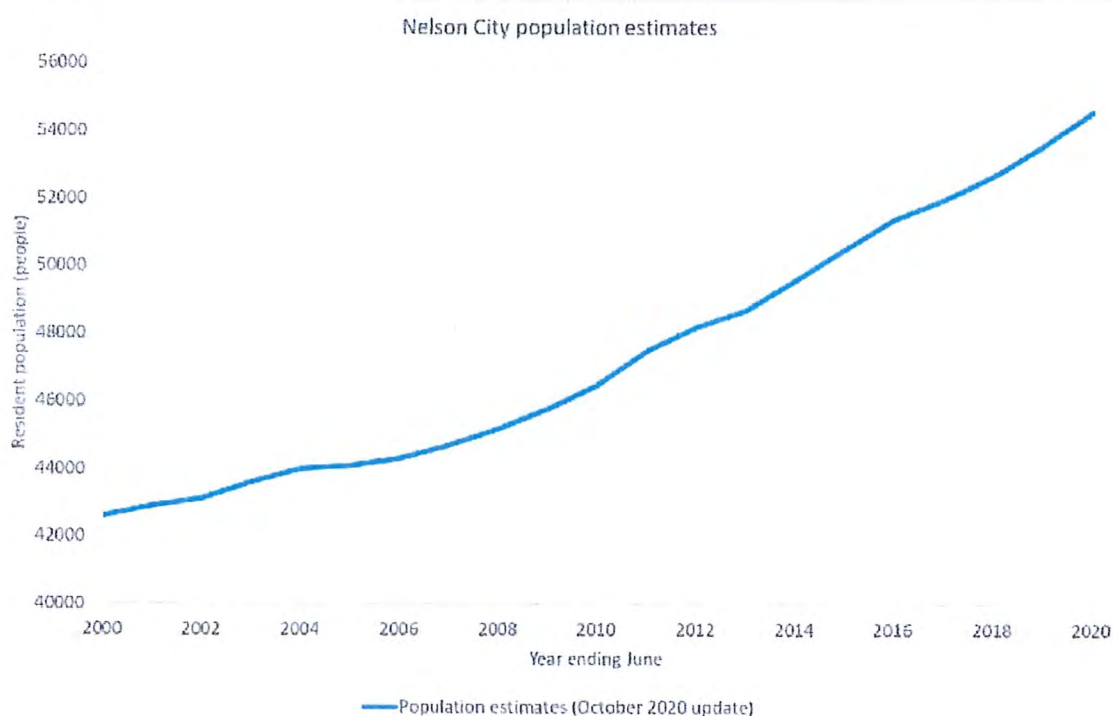


Figure 1: Nelson City population estimates from StatsNZ (as at end June 2020)<sup>1</sup>

- 3.2 Figure 1 shows that the estimated population has tracked in two distinct stages. Between 2000 and 2008 the population of Nelson grew by around 330 people or 130 households per year on average. Since 2008 the rate of population growth has increased to around 700 additional residents or 290 additional households per year.

<sup>1</sup> StatsNZ <http://nzdotstat.stats.govt.nz/wbos/Index.aspx> - Estimated Resident Population for Regional Council Areas, at 30 June (1996+) (Annual-Jun)

### Future population

- 3.3 In previous Long Term Plan development rounds StatsNZ has supplied population projections within the five years previous, following a census, for around 30 years into the future. Due to challenges faced during the 2018 census, StatsNZ are not able to provide population projections in time for the development of activity management plans and the 2021 Long Term Plan. Instead, the latest population projections provided by StatsNZ at the end of 2018 are based on the 2013 census.
- 3.4 Figure 2 below shows the StatsNZ high, medium and low population projections based on the 2013 census data along with the Nelson City population estimates from Figure 1.

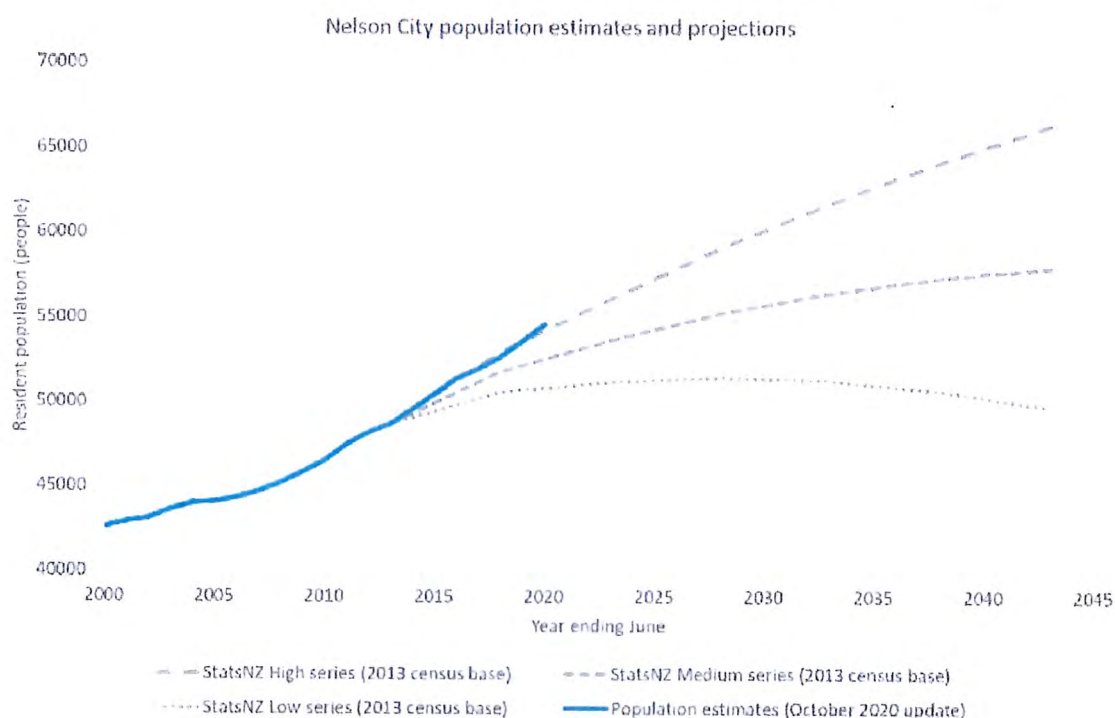


Figure 2: Nelson Population projections (2013 census base)<sup>2</sup>

- 3.5 These population projections are no longer relevant in the light of COVID19 and alternative analysis methods are needed. The remainder of this report deals with these alternative methods.

<sup>2</sup> StatsNZ <http://nzdotstat.stats.govt.nz/wbos/Index.aspx> - Dataset: Subnational population projections, characteristics, 2013(base)-2043 update

## 4.0 Recessions through history

- 4.1 With a significant recessionary period expected during and following COVID19 it is useful to look back at other recessions in history to see the effect on the various factors that influence population growth.
- 4.2 Since 1930 there have been seven clear recessions starting with the wool bust in 1930 through to the most recent, prior to COVID19, with the Global Financial Crisis in 2007-2008. Table 1 below summarises the recessions since 1930.

| Recession name    | Start year (inclusive) | Finish year (inclusive) | Period (years) |
|-------------------|------------------------|-------------------------|----------------|
| Depression        | 1930                   | 1934                    | 5              |
| Wool bust         | 1967                   | 1969                    | 3              |
| Oil price shock 1 | 1974                   | 1977                    | 4              |
| Oil price shock 2 | 1979                   | 1982                    | 4              |
| Recession         | 1991                   | 1992                    | 2              |
| Asian Crisis      | 1997                   | 1999                    | 3              |
| GFC               | 2007                   | 2008                    | 2              |

Table 1: Recessions through history<sup>3</sup>

- 4.3 It is important to consider the different characteristics of each recession in that they influence things like travel and unemployment in different ways depending on their size and geographical spread amongst other things. For example, COVID19 has resulted in far more restrictions on travel internationally than all of the previous recessionary periods and as a result the tourism industry has been affected more severely. With the tourism industry employing approximately 11% of Nelsons employed population in 2019 this characteristic that is unique to COVID19 is particularly significant.
- 4.4 Figure 3 below shows a table from the Reserve Bank of New Zealand: Bulletin, Vol. 71, No. 2, June 2008 which provides a summary of the various attributes of the recessionary periods prior to the GFC. The document was prepared for the purposes of attempting to describe the likely economic effects to the GFC. While the document is over 10 years old now, its conclusions are still relevant.

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<sup>3</sup> Reserve Bank of New Zealand: Bulletin, Vol. 71, No. 2, June 2008

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|                                  |                                                                                 |                     | Recessionary Periods |           |               |               |       |              |
|----------------------------------|---------------------------------------------------------------------------------|---------------------|----------------------|-----------|---------------|---------------|-------|--------------|
|                                  |                                                                                 |                     | Depress.             | Wool Bust | 1st Oil Shock | 2nd Oil Shock | 91-91 | Asian Crisis |
| Pre-existing imbalances          | Rapid credit and asset price expansion                                          | Global              |                      |           |               |               |       |              |
|                                  |                                                                                 | NZ                  |                      |           |               |               |       |              |
|                                  | Well above trend                                                                | Commodity prices    |                      |           |               |               |       |              |
|                                  |                                                                                 | Real exchange rate  |                      |           |               |               |       |              |
|                                  |                                                                                 | House prices        |                      |           |               |               |       |              |
|                                  |                                                                                 | Real interest rates |                      |           |               |               |       |              |
|                                  | Unusually large current account deficit                                         |                     |                      |           |               |               |       |              |
|                                  | Large public debt                                                               |                     |                      |           |               |               |       |              |
|                                  | Inflation problem                                                               |                     |                      |           |               |               |       |              |
|                                  | Domestic financial fragility                                                    |                     |                      |           |               |               |       |              |
| Triggers and exacerbating events | World downturn                                                                  |                     |                      |           |               |               |       |              |
|                                  | Global credit/asset price squeeze                                               |                     |                      |           |               |               |       |              |
|                                  | Large fall in commodity prices                                                  |                     |                      |           |               |               |       |              |
|                                  | Large rise in oil prices                                                        |                     |                      |           |               |               |       |              |
|                                  | Drought                                                                         |                     |                      |           |               |               |       |              |
|                                  | Contractionary discretionary fiscal policy                                      |                     |                      |           |               |               |       |              |
|                                  | Tightened monetary policy/ interest rates rose after the downturn was under way |                     |                      |           |               |               |       |              |
| Exacerbating structural factors  | Fixed or pegged exchange rate                                                   |                     |                      |           |               |               |       |              |
|                                  | Capital controls in place                                                       |                     |                      |           |               |               |       |              |

Key:

|                       |  |
|-----------------------|--|
| A critical factor     |  |
| A contributing factor |  |
| Not a factor          |  |

Figure 3: The characteristics of recessionary periods<sup>4</sup>

- 4.5 Figure 3 shows that each recessionary period is unique and in fact no two periods had all of their attributes matching during the period of recession. During and following COVID19 will have its own unique attributes which will make predicting population change with any certainty very difficult.
- 4.6 In April 2020 Treasury released a paper titled "COVID19 Information Release" which detailed some of the thinking and analysis that Treasury had been undertaking. A key statement in this paper is:

*The path the economy takes from here is extremely uncertain. The magnitude and duration of the downturn and the subsequent pace of the recovery depends on many unknown factors, including the course of the virus, how long activity restrictions are in place, how quickly the global*

<sup>4</sup> Reserve Bank of New Zealand: Bulletin, Vol. 71, No. 2, June 2008

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*economy will recover, how behaviours and production might change, and how successful government policies will be in supporting households and firms.<sup>5</sup>*

- 4.7 In light of the above information and given the unprecedented nature of COVID19, it is impossible to predict the extent and timing of the potential impacts on Nelson's population with any degree of accuracy. Instead, the following sections of this report assess the factors that are likely to influence any change in population in a broad way so the level of uncertainty around the final proposed population projection is understood.

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<sup>5</sup> Treasury Report T2020/973: Economic scenarios - 13 April 2020 - <https://treasury.govt.nz/sites/default/files/2020-04/c19-4265378-t2020-973-economic-scenarios-v3.pdf>

## 5.0 Factors influencing population change

5.1 There are three major influencers of population change that represent the collated wider factors. These are:

- Births
- Deaths
- Net migration

5.2 Within each of these bulk factors are multiple others such as economic performance and immigration policy. These factors themselves may have further dependencies on things like how easy it is to sell and buy houses, or gain employment. All of these factors are not related in a purely linear fashion but instead form a complex web of interdependency.

5.3 Figure 4 below provides a simplified description of the relationship between the main factors that influence population change.

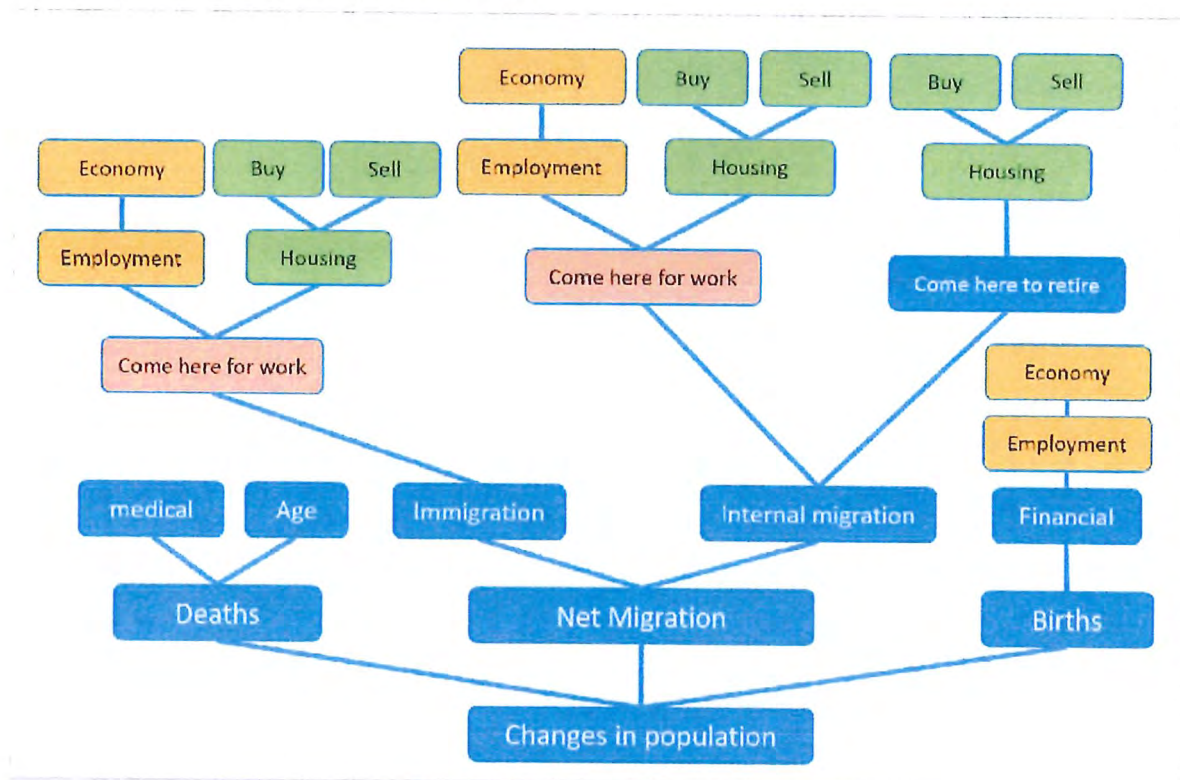


Figure 4: Simplified relationship between factors influencing changes in population

5.4 It is clear from Figure 4 above that the economy and housing market are two key drivers of population change. The remainder of section 3 provides commentary on the effect of each of the factors on population change in the Nelson region.

## 6.0 Births

- 6.1 One major influencer of births in a developed country like New Zealand is its economic performance and how that influences unemployment rates.
- 6.2 Figure 5 below shows the number of live births over time for New Zealand as a whole with the timelines of each of the recessionary periods since 1935.

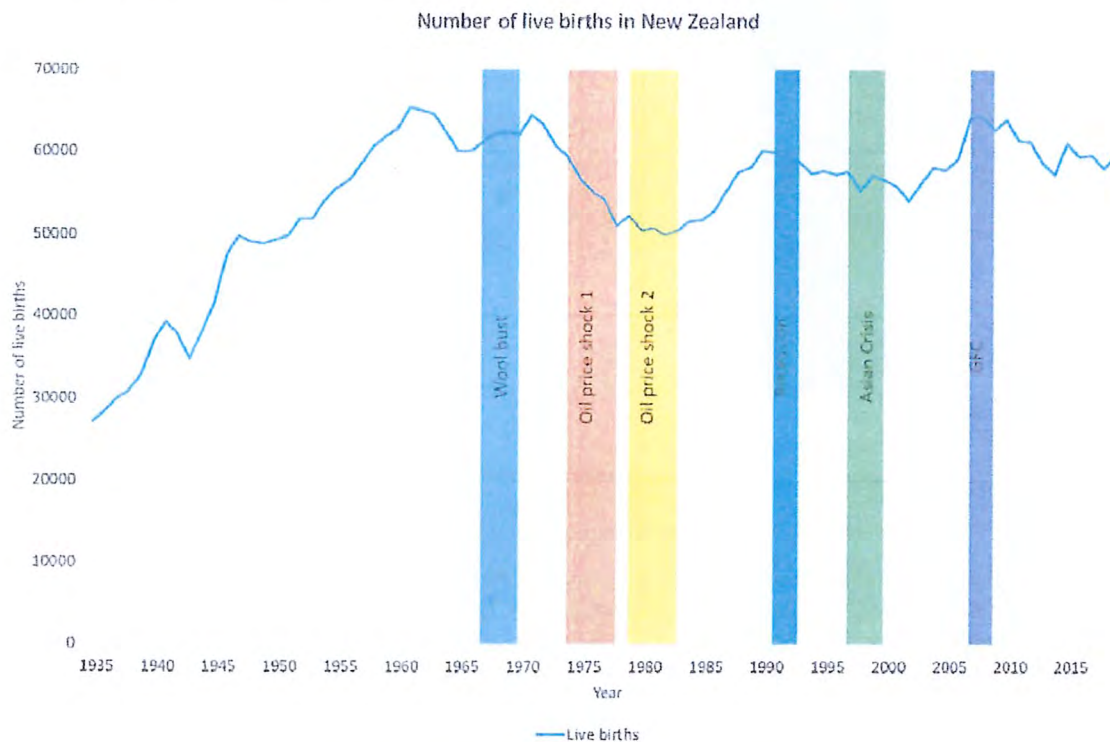


Figure 5: Live births In New Zealand over time<sup>6</sup>

- 6.3 Figure 5 above shows that for all recessionary periods other than the wool bust there was a dip in births for some time during or after the period of recession. In three of the recessions the number of births picked up almost immediately in the economic recovery. The immediate increase in births after the GFC has moved to a gradually reducing trend to return to the 60,000 births mark that the number has varied around since around the late 1950s.
- 6.4 Long term births data at a regional level are not available at the resolution needed to test whether the trend holds in Nelson over all of the same recessionary periods. In the shorter term, reliable births data is available from 2004 and can be compared to the national response during the GFC. Figure 6 below compares the two.

<sup>6</sup> StatsNZ Infoshare – Table: Birth numbers - VSBA (Annual-Dec)

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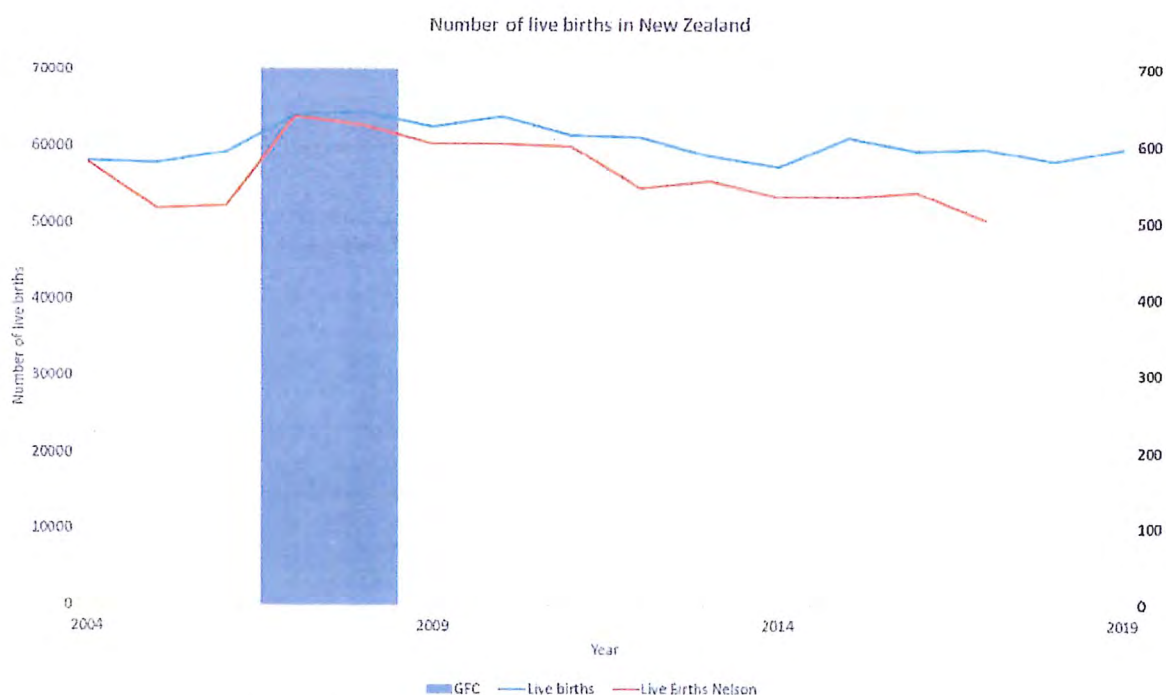


Figure 6: Nelson births over time compared to New Zealand trend<sup>7</sup>

- 6.5 Figure 6 shows that the number of live births in Nelson broadly followed the same trend as the rest of New Zealand during and after the GFC. The number of births in Nelson flattened then dropped during the GFC and have continued to drop through to 2017. The trend of reducing births continues for around ten years although there are other factors influencing this such as the generally reducing birth rates in developed countries.
- 6.6 Economists are divided in how long they see any economic recovery taking with some predicting sometime in late 2021 and others the end of 2022 or beyond.
- 6.7 Figure 7 below shows the latest StatsNZ population projections (2013 census base) for live births in Nelson.

<sup>7</sup> <https://www.stats.govt.nz/information-releases/births-and-deaths-year-ended-december-2018>

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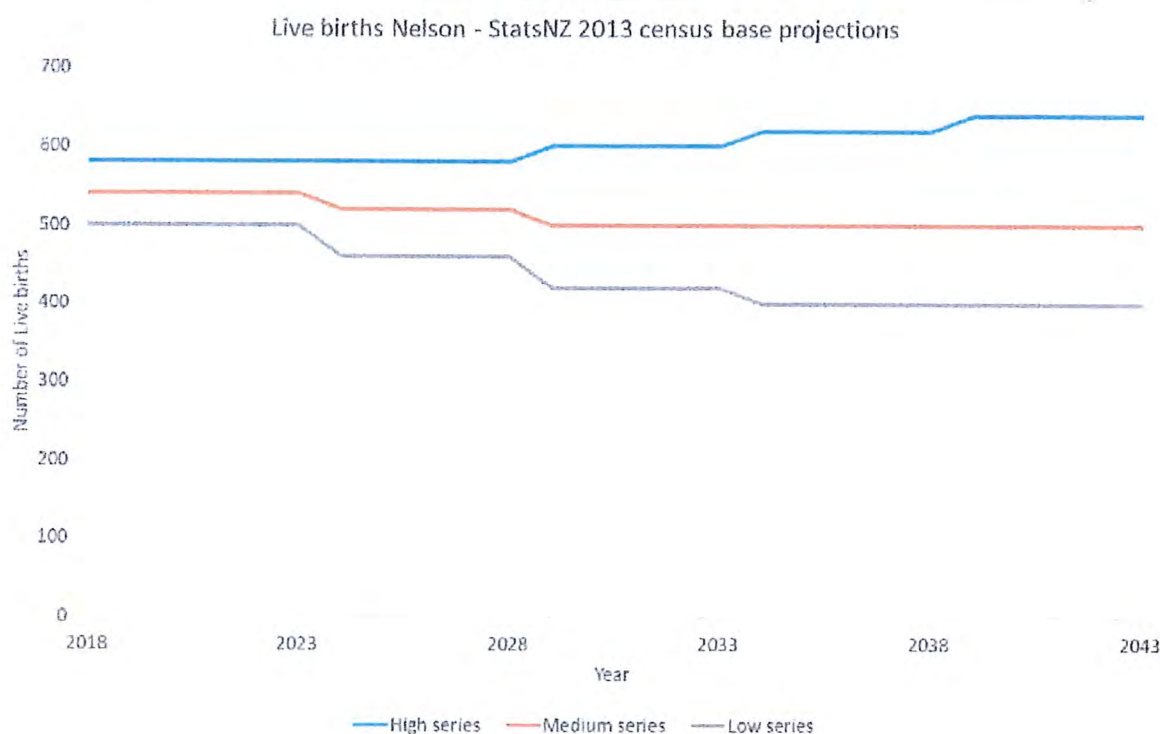


Figure 7: Live births assumptions in StatsNZ population projections<sup>8</sup>

- 6.8 Figure 7 above shows that both the low and medium series of the StatsNZ population projections anticipate a drop in live births in Nelson. The records of births for Nelson in figure 6 show that the current number of births per year are around the 500 live births per year. This is the same as the low series shown in figure 7 above and can be expected to drop lower during the economic recession that will follow COVID 19.
- 6.9 Countering the current low birth rate is the fact that the population of Nelson is slightly younger, with more residents of childbearing age than anticipated by the 2013 census base projections. This is likely to result in the birth rate being slightly higher than currently anticipated by each of the StatsNZ projection scenarios.
- 6.10 With this in mind it is recommended that the medium birth rate be adopted in any analysis for the next ten years to mirror the trend seen post GFC. It is recommended to return the birth rate to high after that to allow for some recovery, keeping in mind that the current high scenario still reflects the generally reducing birth rate in first world countries.

## 7.0 Deaths

- 7.1 The number of deaths in Nelson number around 470 per year currently. The majority of these deaths are as a result of natural aging. In estimating the likely effect of the COVID19 event on the death rate, the most important influencing factor is the ability of the medical system to deal with COVID19 and the normal medical services. With the government's

<sup>8</sup> StatsNZ NZ.Stat - Dataset: Subnational population projections, characteristics, 2013(base)-2043 update

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response to COVID19 so far being comprehensive enough to keep additional deaths very low the number of deaths is not expected to increase noticeably over the normal year to year variation.

- 7.2 The StatsNZ high and medium series use the same the same death rates so it is recommended that these be used rather than the higher death rate of the low series. This should be used for the full period of the population projections.

## 8.0 Net Migration

8.1 The third main factor influencing population change is net migration. In Nelson, net migration has typically accounted for the majority of population growth. There are a lot of different factors that influence peoples decision making when choosing to move to or from Nelson but the major ones that need to be considered in the context of COVID19 are the following:

- Tourism
- Unemployment
- International migration
- Housing market

8.2 It is clear that the variables above are not independent of each other but it is useful to consider them separately in the first instance to simplify description of the issues associated with each of them.

### Tourism

8.3 Tourism is a strong driver of employment in Nelson with around 11% of all jobs in the region linked to this activity. Since 1965 tourism has grown at a rapid rate from almost zero to over three million visitors every year in Nelson.

8.4 Figure 8 below shows the trend in visitor numbers in New Zealand over time and how they are affected by the various recessionary periods.

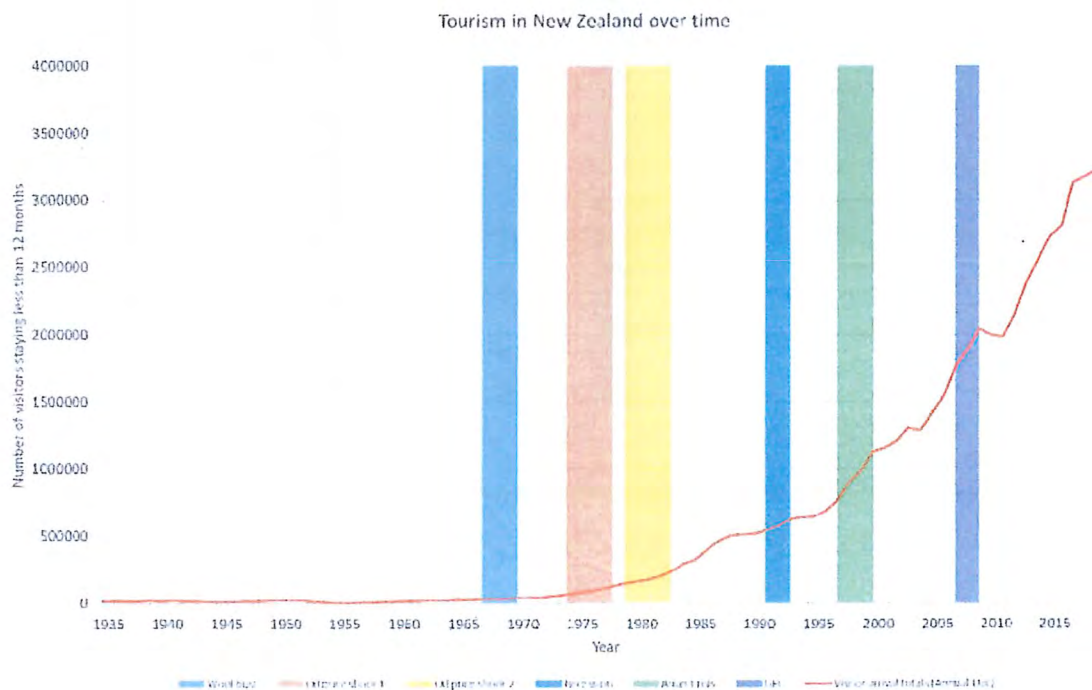


Figure 8: Visitor numbers to New Zealand<sup>9</sup>

<sup>9</sup> StatsNZ Infoshare – Table: Visitor arrival totals (Annual-Dec)

- 8.5 Figure 8 above shows that when visitor numbers were low between 1965 and 1985 the recessionary periods had very little effect but for the last three recessionary periods the effect has grown. The GFC resulted in visitor numbers dropping for two years before recovering to a similar trajectory as before the GFC.
- 8.6 One factor that is unique to COVID19 is the full shutdown of international travel. This has had the effect of greatly reducing the scale of the airlines that service New Zealand. This factor, along with the fact that the borders are likely to stay closed to a large number of countries for some time will mean that the effect on tourism is going to be severe, potentially for several years.
- 8.7 With the relatively high number of jobs associated with tourism in Nelson it can be expected that unemployment will remain higher than normal for around 2-5 years.

### Unemployment

- 8.8 Increased unemployment is a very likely outcome of COVID in Nelson. Figure 9 shows the total number of people unemployed in New Zealand over time against the backdrop of each of the recessionary periods since 1986.

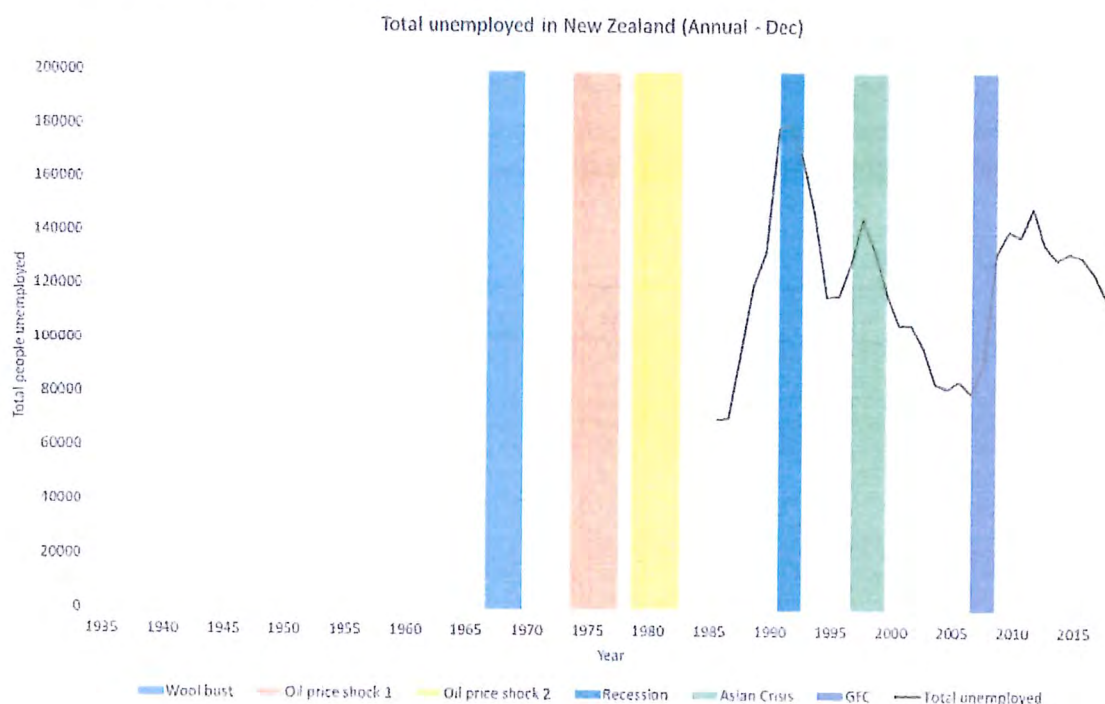


Figure 9: New Zealand unemployment – Long term trend<sup>10</sup>

- 8.9 Figure 9 shows that there is an inevitable increase in unemployment in New Zealand in the lead up to or during each of the last three recessionary periods. Of interest is the recovery after the GFC being delayed slightly compared to the two previous recessionary periods.

<sup>10</sup> StatsNZ Infoshare – Table: Unemployed by Sex by Duration of Unemployment (Annual-Dec)

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8.10 To compare Nelson's unemployment to the rest of New Zealand, underutilisation is a more effective measure as more reliable data is available over a longer period. Underutilisation is defined as the following:

- do not have a job, but are available to work and are actively seeking employment – unemployed
- are employed part time (fewer than 30 hours a week) and who both want and are available to increase the number of hours they work – underemployed
- want a job and are available to work, but are not currently looking for a job – available potential jobseeker
- are unavailable to start work but are looking for a job as they will be able to start work within the next month – unavailable jobseeker.

8.11 Figure 10 below shows the underutilisation for Nelson and New Zealand over the period leading up to, during and following the GFC.

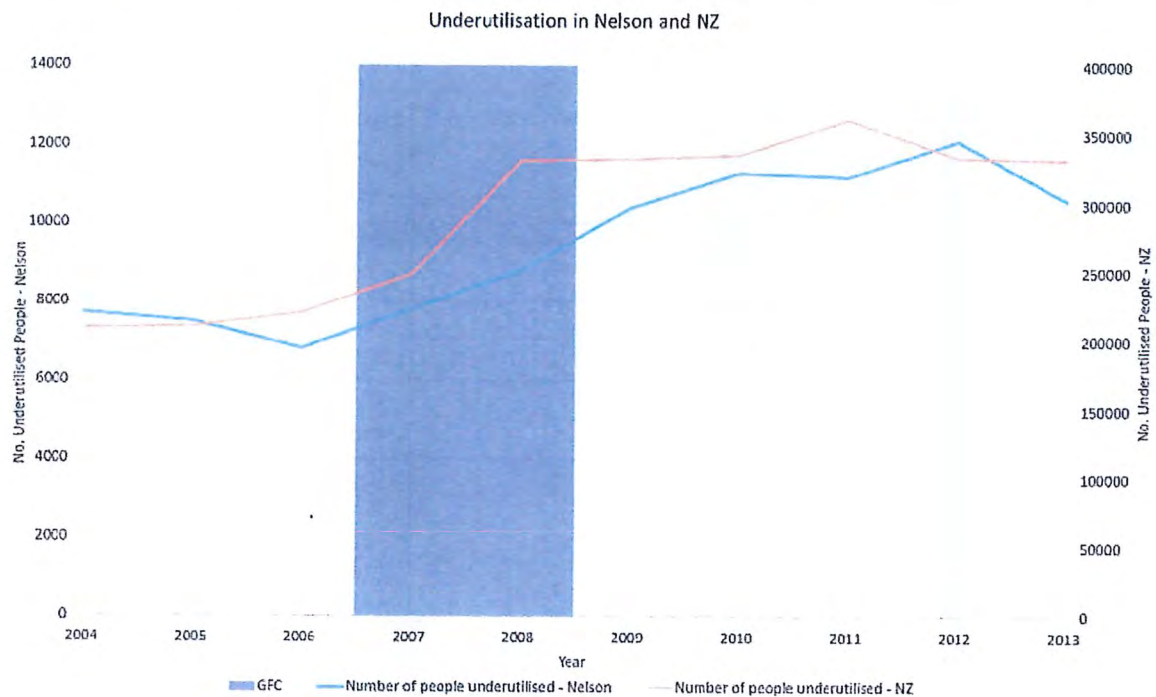


Figure 10: Workforce underutilisation<sup>11</sup>

8.12 Figure 10 above shows that the underutilisation for Nelson generally follows the trend in New Zealand as a whole with an increase in underutilisation in the lead up to, during and after the GFC.

8.13 An increase in underutilisation or unemployment has the potential to limit the ability of people to migrate to and from Nelson. In the case of domestic migration, it is unlikely that employment will be any better elsewhere in the country and therefore we could expect

<sup>11</sup> StatsNZ Infoshare – Table: Underutilisation by Sex by Regional Council (Annual-Dec)

internal migration to be relatively balanced for around the next five years if the GFC example is used.

- 8.14 In the case of migration to and from international locations, the response to COVID19 will limit people's ability to move here or move away, likely for several years.

### Housing market

- 8.15 A key factor in attracting people to move to Nelson, aside from employment, is the availability of housing and their ability to sell their existing house. Figure 11 below shows the average number of days that it has taken to sell residential properties in New Zealand since 1992. The data is sourced from REINZ monthly reporting but needs to be treated with some caution as the data does not take into account properties being on the market for a longer period but the vendor changing estate agents throughout the process.

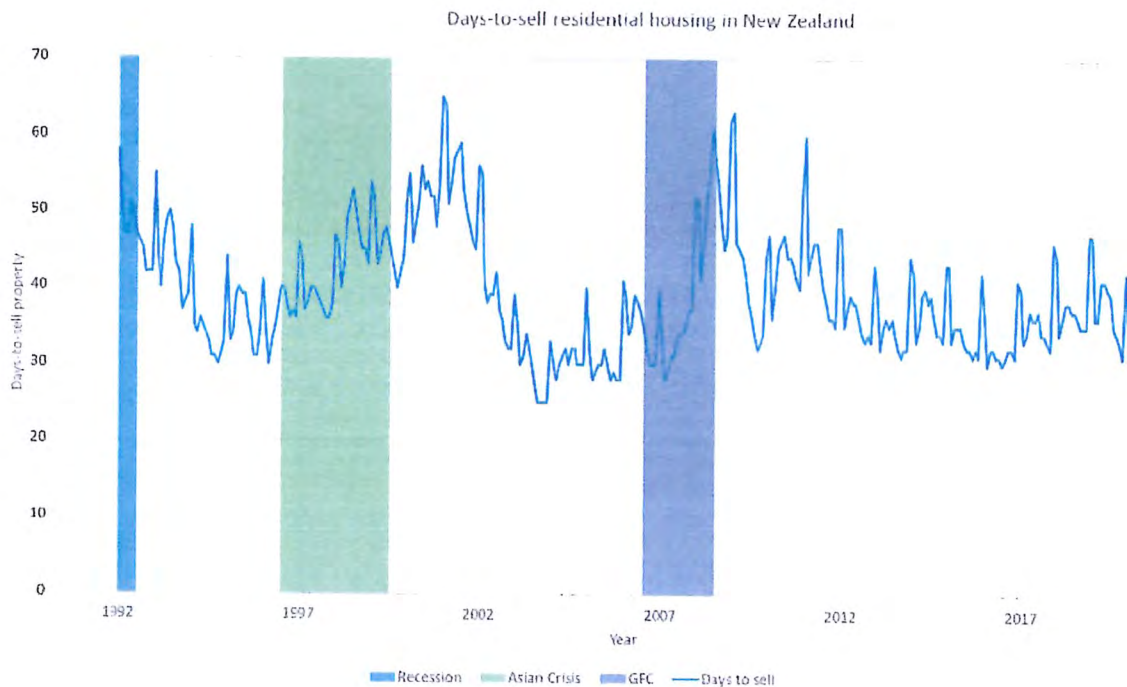


Figure 11: Days to sell residential property in New Zealand<sup>12</sup>

- 8.16 Figure 11 above shows that over the last two recessionary periods the housing market has slowed with the time taken to sell property increasing significantly before, during and after the recessions. This has the effect of limiting people's ability to move between centres within New Zealand. Those wanting to move from overseas have the same problems as the property market in places like Australia and the United Kingdom often mirror what the happening in the housing market in New Zealand.

<sup>12</sup> <https://www.interest.co.nz/charts/real-estate/days-sell>

### **International Migration**

- 8.17 As discussed in the unemployment and housing market sections above, the increased unemployment and the slowing of the housing market globally is likely to significantly slow the arrivals of international migrants to Nelson. The data available to provide analysis of this issue is not of suitable quality or resolution to allow meaningful numbers for determining the actual arrival rate.

### **Net Migration Summary**

- 8.18 In summary, there are a lot of interrelated factors that influence net migration for Nelson. There is uncertainty in how the factors may work together to limit the actual net migration creating uncertainty in population projections. A broad overall view of the factors is therefore taken and a StatsNZ net migration figure (or figures) selected that limits Councils financial risk.
- 8.19 It is recommended that the following net migration numbers be adopted for the purposes of the Asset Management Plans and LTP:
- zero net migration for two years
  - low net migration for the next three years
  - medium net migration for the next five years
  - high net migration after that
- 8.20 The above recommended net migration profile will limit Councils financial risk by giving time to monitor the actual growth over the next three years and adjust as needed without overinvesting in infrastructure and services or under collecting rates.

## **9.0 Final recommended variables**

- 9.1 The assumptions for the purposes of developing a population projection for Asset Management Plans and the LTP are recommended as follows:
- medium births for ten years
  - high births after that
  - medium deaths
  - zero net migration for two years
  - low net migration for the next three years
  - medium net migration for the next five years
  - high net migration after that

- 9.2 All are Statistics New Zealand variables from the latest population projections.

## **10.0 Population Projection**

- 10.1 Using the variables recommended for adoption in section seven above, population projections in table 2 below have been developed.

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| Year | Projected population | Year | Projected population | Year | Projected population | Year | Projected population |
|------|----------------------|------|----------------------|------|----------------------|------|----------------------|
| 2020 | 54,620               | 2028 | 56,160               | 2036 | 59,760               | 2044 | 63,400               |
| 2021 | 54,700               | 2029 | 56,400               | 2037 | 60,260               | 2045 | 63,840               |
| 2022 | 54,780               | 2030 | 56,640               | 2038 | 60,760               | 2046 | 64,280               |
| 2023 | 54,960               | 2031 | 57,180               | 2039 | 61,200               | 2047 | 64,720               |
| 2024 | 55,080               | 2032 | 57,720               | 2040 | 61,640               | 2048 | 65,160               |
| 2025 | 55,200               | 2033 | 58,260               | 2041 | 62,080               | 2049 | 65,600               |
| 2026 | 55,520               | 2034 | 58,760               | 2042 | 62,520               | 2050 | 66,040               |
| 2027 | 55,840               | 2035 | 59,260               | 2043 | 62,960               |      |                      |

Table 2: Recommended population projection for AMPs and LTP

10.2 Figure 12 below shows the projection in graphical form along with the StatsNZ high and medium series projections adjusted for the latest October 2020 population estimates which were higher than expected.

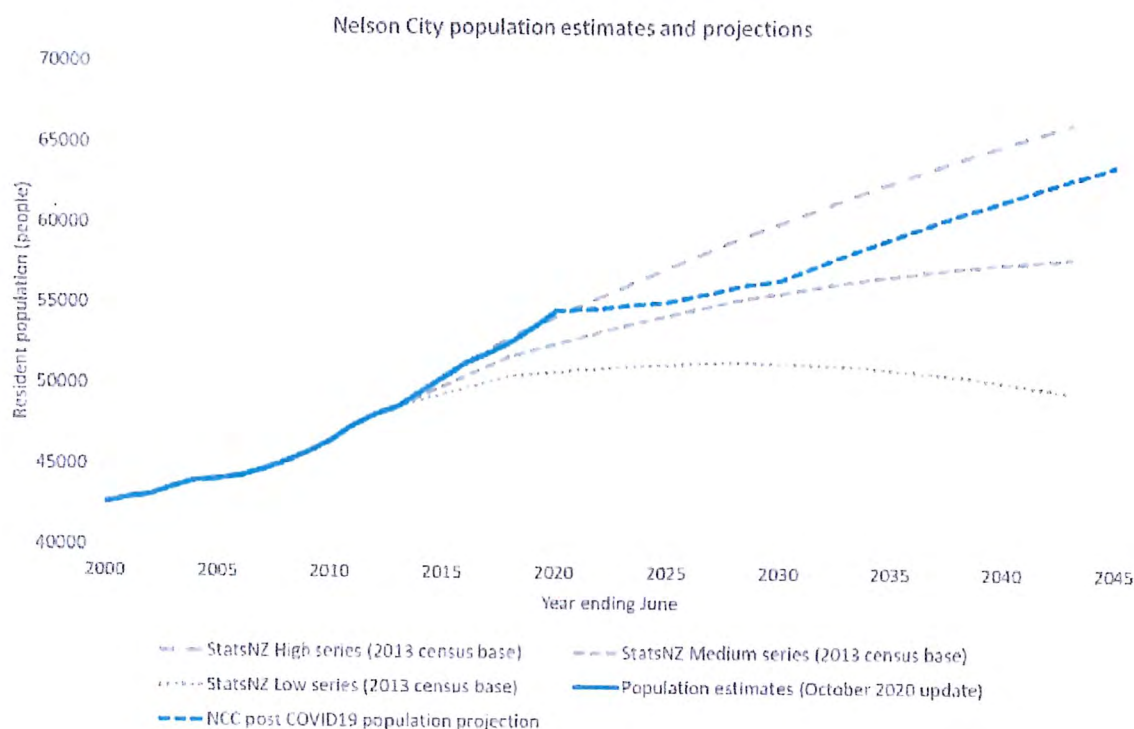


Figure 12: Recommended population projection and comparison projections

10.3 Figure 12 above shows that the recommended population projection tracks down, away from the high series before gradually returning to the same rate of growth as the high series some eight years later.

## 11.0 Households

- 11.1 To calculate the number of households that correspond to the recommended population projection in section 8, a household occupancy rate of 2.3 people per house was used for up until 2028 and 2.2 people per household after that based broadly on the StatsNZ recommended occupancy rates. Minor smoothing between the two rates has been done to allow for the fact that the jump would not occur in single year.
- 11.2 Table 3 below summarises the number of households expected each year under the recommended population projection.

| Year | Projected households | Year | Projected households | Year | Projected households | Year | Projected households |
|------|----------------------|------|----------------------|------|----------------------|------|----------------------|
| 2020 | 23,748               | 2028 | 24,960               | 2036 | 27,164               | 2044 | 28,818               |
| 2021 | 23,783               | 2029 | 25,348               | 2037 | 27,391               | 2045 | 29,018               |
| 2022 | 23,817               | 2030 | 25,745               | 2038 | 27,618               | 2046 | 29,218               |
| 2023 | 23,896               | 2031 | 25,991               | 2039 | 27,818               | 2047 | 29,418               |
| 2024 | 23,948               | 2032 | 26,236               | 2040 | 28,018               | 2048 | 29,618               |
| 2025 | 24,000               | 2033 | 26,482               | 2041 | 28,218               | 2049 | 29,818               |
| 2026 | 24,139               | 2034 | 26,709               | 2042 | 28,418               | 2050 | 30,018               |
| 2027 | 24,545               | 2035 | 26,936               | 2043 | 28,618               |      |                      |

Table 3: Households by year under recommended population projection

- 11.3 Figure 13 below shows the household projection in graphical form.

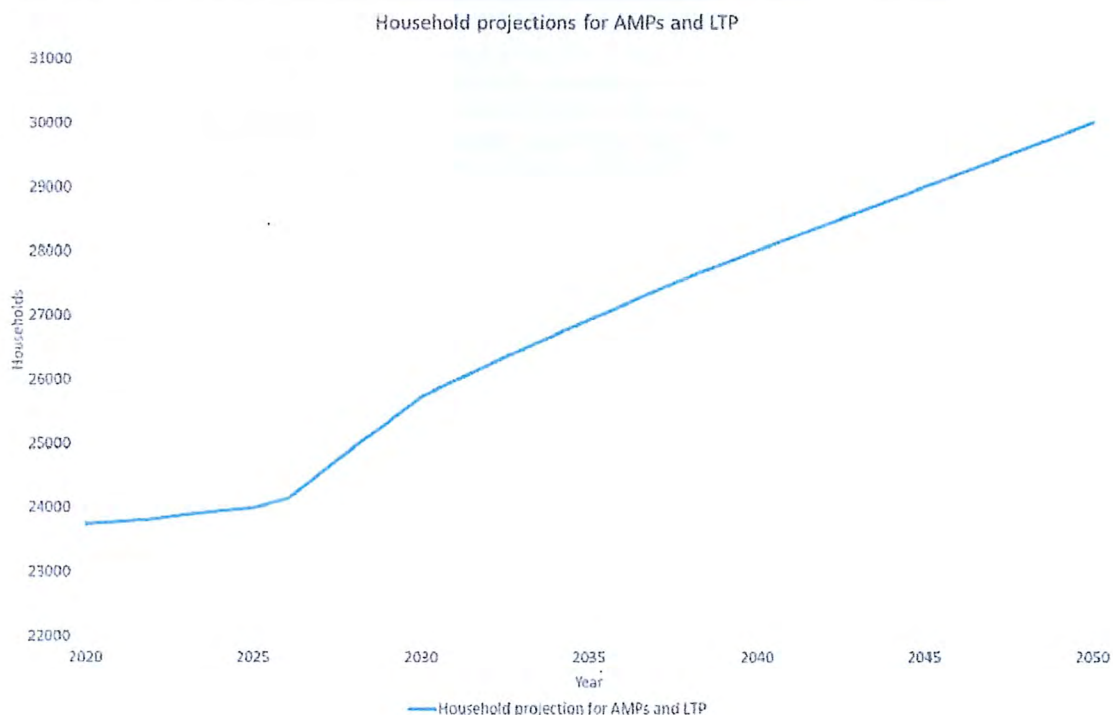


Figure 13: Household projection based on recommended population projection

## 12.0 Age profile

- 12.1 It is important to consider the age breakdown of Nelson residents when considering what, how, when and where Council should provide services. The age demographics provided by StatsNZ begin to break down under a hybrid population due to the complex relationship between births, deaths and net migration.
- 12.2 For the purposes of enabling decision making around an aging population figure 14 shows the breakdown of the Nelson population by age group and gender from the 2018 census.

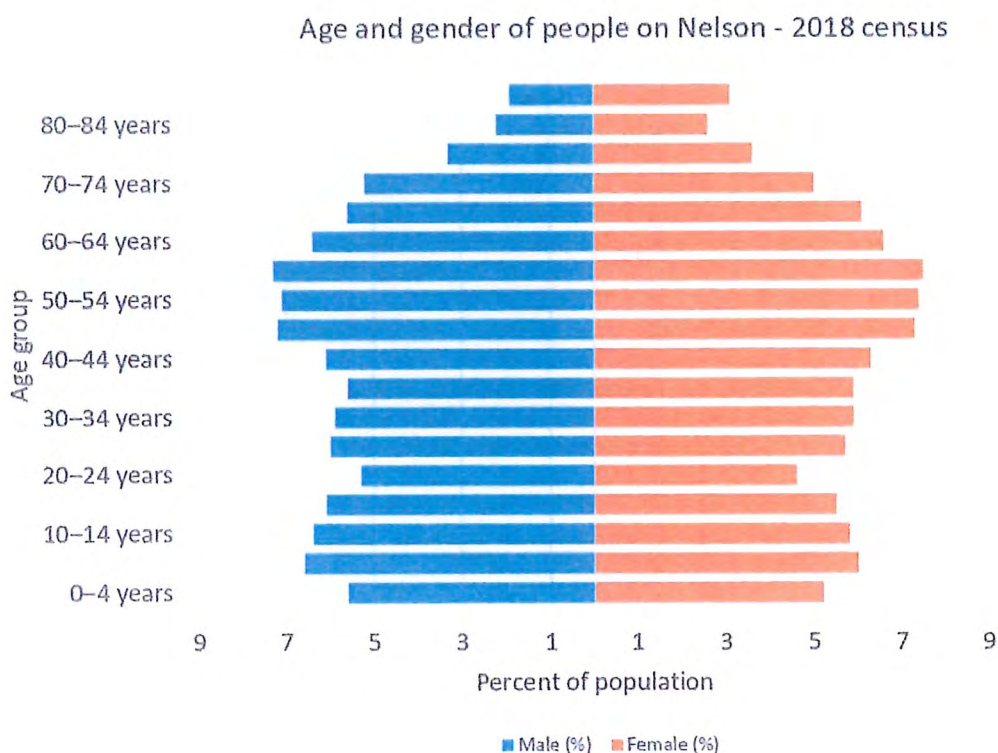


Figure 14: Age and gender breakdown of Nelson population at census 2018<sup>13</sup>

- 12.3 Figure 14 shows there are two distinct bulges for the age groups 5-19 years old and 45-59 years old with a narrowing between these ages at the 20-24 year old cohort.
- 12.4 Previous analysis has shown that the Nelson population, under all three of the StatsNZ growth series, will age rapidly and at a much faster rate than New Zealand as a whole. Figure 15 below shows the estimated proportion of each age cohort over time. Again, this is a high level estimate and only the overall trends should be considered rather than the actual numbers.

<sup>13</sup> NZStats Place Summaries - <https://www.stats.govt.nz/tools/2018-census-place-summaries/nelson-region#population-counts>

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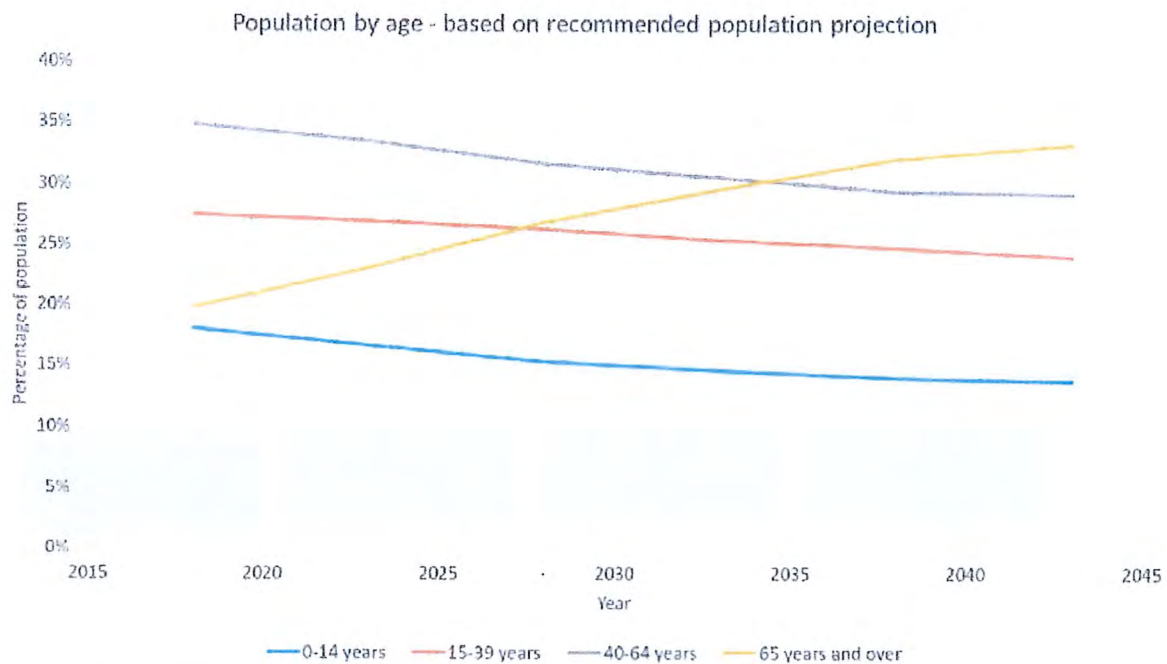


Figure 15: Age cohort trends for Nelson

- 12.5 Figure 15 above shows, as expected, the 65 years and over cohort to be the only increasing cohort. The reduction in all other cohorts is as a result of the low birth rate in the projection as well as the large number of people moving from the 40-65 years group into the 65 years and over group.
- 12.6 Broadly, the 65 years and over cohort will make up around a third of Nelson's population by 2043 under this scenario.

### 13.0 Conclusion

- 13.1 The purpose of the preceding report is to present a population projection for use in developing Nelson City Council's Asset Management Plans and Long Term Plan.
- 13.2 In 2018, the latest census was completed but due to shortcomings in the move to online forms the return rate was lower than previously experienced. As a result, there has been significant delays in Statistics New Zealand providing updated population projections.
- 13.3 Additionally, the COVID19 event is expected to have significant immediate and future economic effects particularly as it restricts the movement of people regionally and internationally.
- 13.4 New population estimates were published by StatsNZ in October 2020 and these have been used to provide an updated 2020 base population for the population projections. This base population is higher than previously presented in the draft of this report.
- 13.5 In this context there is a lot of uncertainty involved with projecting future population change. To account for this a custom, or hybrid, population projection for Nelson has been developed.

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13.6 It is recommended that the following assumptions inform a future population projection for Nelson:

- medium births for ten years
- high births after that
- medium deaths
- zero net migration for two years
- low net migration for the next three years
- medium net migration for the next five years
- high net migration after that

13.7 These assumptions result in a recommended population projection for use in developing the Asset Management Plans and Long Term Plan for 2021 as shown in table 4 below.

| Year | Projected population | Year | Projected population | Year | Projected population | Year | Projected population |
|------|----------------------|------|----------------------|------|----------------------|------|----------------------|
| 2020 | 54,620               | 2028 | 56,160               | 2036 | 59,760               | 2044 | 63,400               |
| 2021 | 54,700               | 2029 | 56,400               | 2037 | 60,260               | 2045 | 63,840               |
| 2022 | 54,780               | 2030 | 56,640               | 2038 | 60,760               | 2046 | 64,280               |
| 2023 | 54,960               | 2031 | 57,180               | 2039 | 61,200               | 2047 | 64,720               |
| 2024 | 55,080               | 2032 | 57,720               | 2040 | 61,640               | 2048 | 65,160               |
| 2025 | 55,200               | 2033 | 58,260               | 2041 | 62,080               | 2049 | 65,600               |
| 2026 | 55,520               | 2034 | 58,760               | 2042 | 62,520               | 2050 | 66,040               |
| 2027 | 55,840               | 2035 | 59,260               | 2043 | 62,960               |      |                      |

Table 4: Recommended population projection for AMPs and LTP

13.8 Figure 16 below shows the recommended population projection in graphical form along with the latest (2018) Statistics New Zealand high and medium and low series based on the 2013 census for the purposes of comparison.

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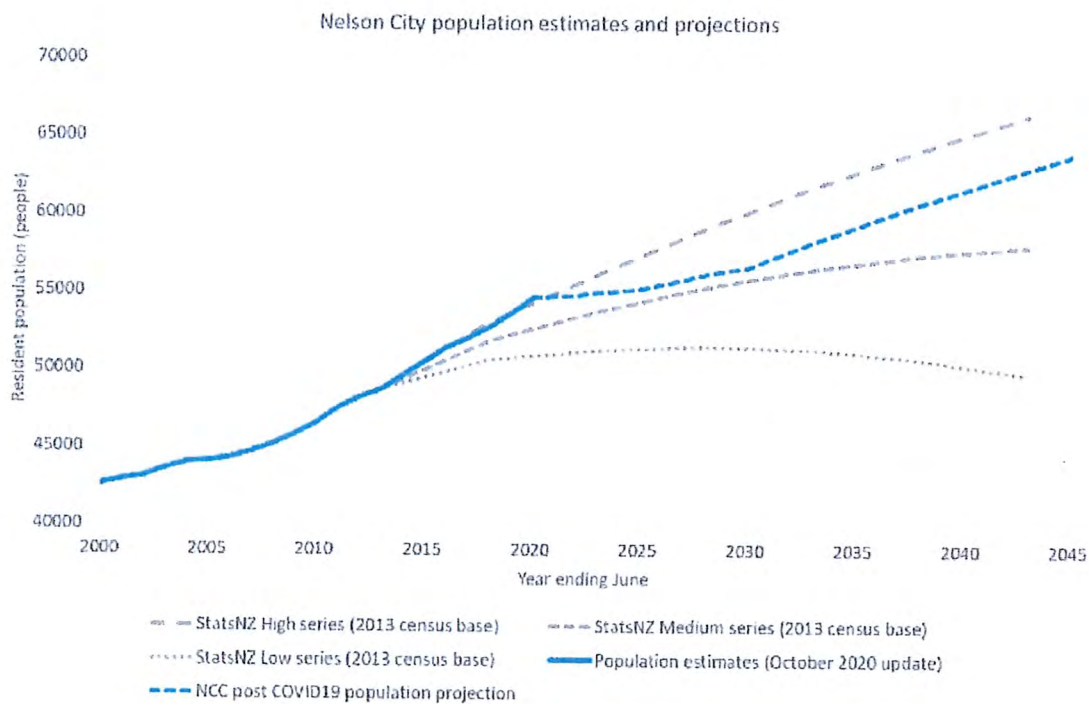
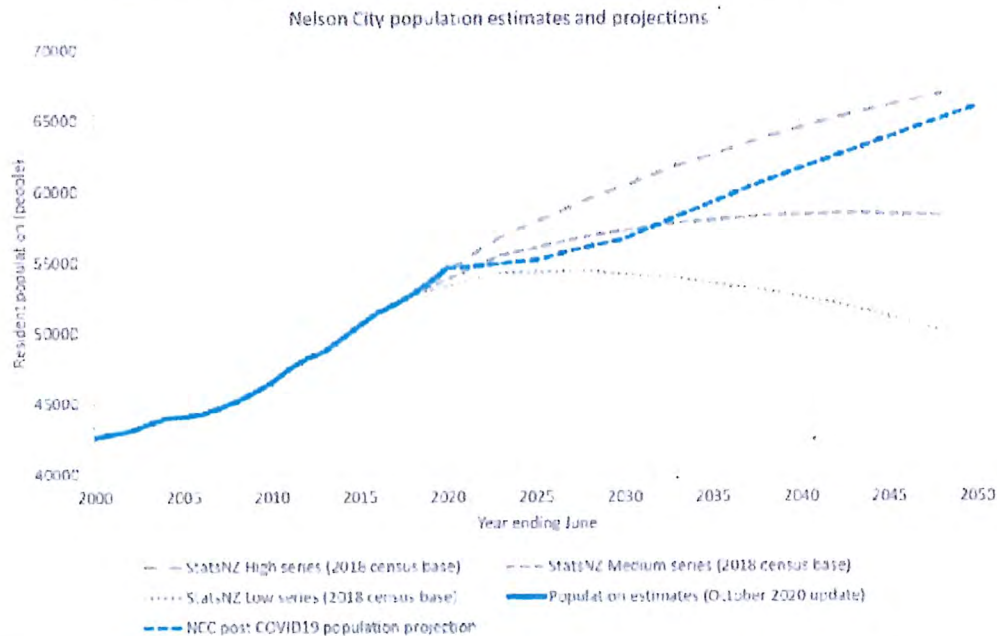


Figure 16: Recommended population projection for AMPs and LTP

- 13.9 It is clear from figure 16 above that the recommended projection is very low compared to the Statistics New Zealand high and medium series scenarios. The projection anticipates very low growth out until around 2030 before the rate of growth eventually increases to the same as the high series.
- 13.10 It is important to recognise that there is very significant uncertainty in any population projection as the short, medium and long term effects of the COVID19 event are not clear and are unlikely to be for some time. A precautionary approach is therefore recommended.



**Figure 3: Population projections adopted for the Nelson LTP 2021-31**



For this HBA, the NCC post Covid19 population has been adopted in line with the 2021-31 LTP. This means that out until around 2031, the population in Nelson is expected to be between the StatsNZ low and medium series projections. Beyond 2031, the population of Nelson is projected to increase at a higher rate that puts it between the StatsNZ medium and high projections.

The city's population projections are reviewed every three years in time to inform the next LTP. However, as a result of the actual population series potentially being different to the series that has been adopted and the impact of this on the city's capacity for housing, some forecasting of the impact of the different population scenarios by low, medium and high population series has also been prepared in the following section.

Further detail on how the population projection for Nelson was developed can be found in the population projection report in appendix 3 of this HBA.

### 3.3 Household projections

To calculate the number of households that correspond to the population projection in section 3.2, a household occupancy rate of 2.3 people per house has been used up to 2028 and 2.2 people per household after that. These rates are based broadly on the StatsNZ recommended occupancy rates. Minor smoothing between the two rates has been applied on the basis that it is not expected for the transition of rates to occur in a single year (e.g. 2.3 people up to 2028 and 2.2 people from 2029). These household projections have also been adopted for use in the Council's LTP 2021-31 as shown in Table 5.

## Item 7: Housing and Business Capacity Assessments for Nelson City and Nelson-Tasman's urban environment: Attachment 1 - A2578160

### Housing and Business Capacity Assessment Report 2021

**Figure 23: Nelson City housing bottom line and capacity.**

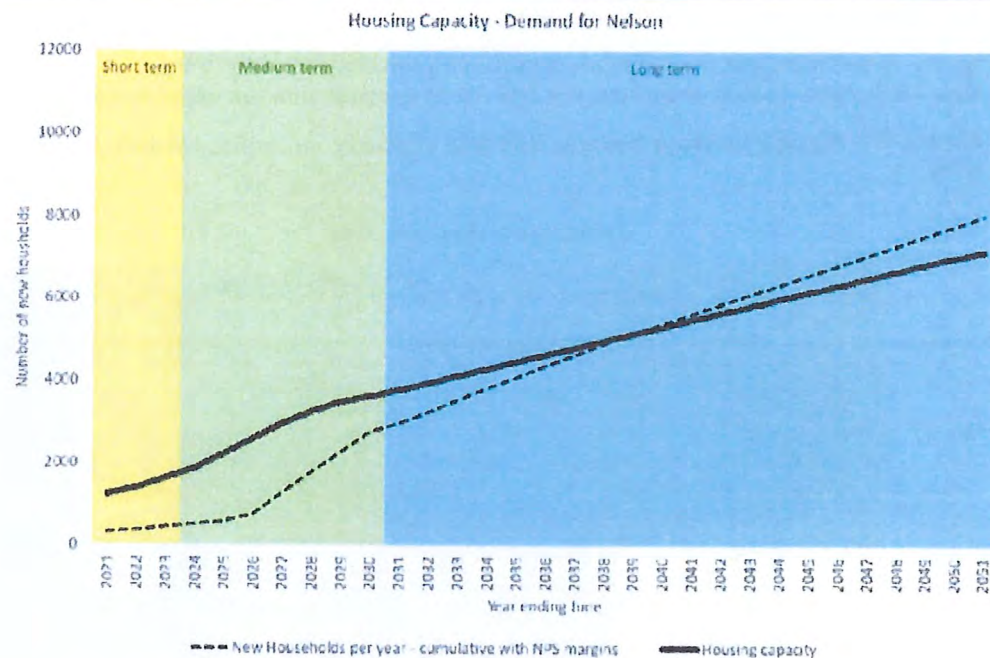


Figure 23 shows that housing capacity, shown as the solid line, exceeds the housing bottom-line until around 2039 or half of the way through the long term. However, if the plan change application submitted to Council for the Maitahi/Bayview development area is approved, demand is expected to exceed supply in around 2043 (instead of 2039).

The current capacity excess of around 1000 households is significant to note given the high property prices currently in the Nelson housing market. Careful monitoring of the gap between capacity and demand and the potential for it to narrow further will be required.

Capacity is broken down into the greenfield, infill and redevelopment components to view how each influence the final figure. Figure 24 below shows housing capacity broken down by type.

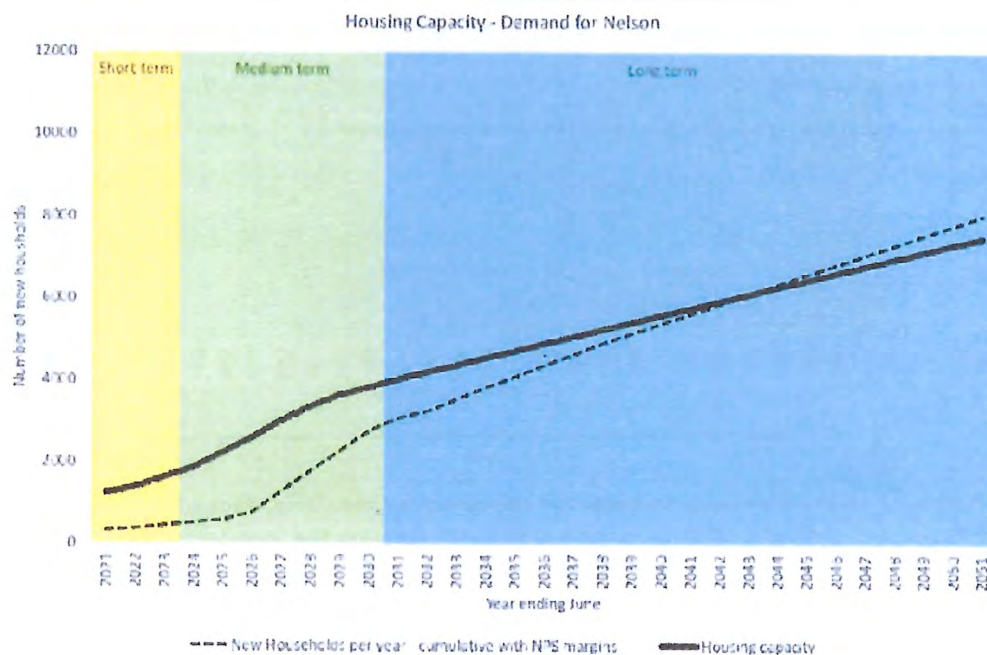
## Item 7: Housing and Business Capacity Assessments for Nelson City and Nelson-Tasman's urban environment: Attachment 1 - A2578160

### *Housing and Business Capacity Assessment Report 2021*

At the time of preparing this assessment a private plan change application has been received by the Council for the development of the Kaka Valley area (known as Maitahi/Bayview Private Plan Change 28).

Figure 25 below shows the demand-capacity relationship over time if the Maitahi/Bayview growth area from the FDS 2019 is included in the capacity assessment.

**Figure 25: Nelson housing bottom line and capacity including Maitahi/Bayview area**



As shown above in Figure 25, if this area is plan enabled and infrastructure ready in the future, the total housing capacity increases to 7,689 at 2051 and in doing so reduces the total shortfall to 564 dwellings. The point at which demand exceeds supply moves out to around 2043.

#### 4.16.2 Residential zone management assumptions

This HBA uses the operative rules under the Nelson Resource Management Plan to assess Nelson's capacity. A review of the Nelson Resource Management Plan is currently underway, and this has produced the draft Whakamahere Whakatū Nelson Plan. The development of the draft Whakamahere Whakatū Nelson Plan has been informed by the analysis that has been undertaken as part of this HBA. In response to the shortfall identified in the housing capacity model, the proposed Whakamahere Whakatū Nelson Plan has been modified to include provisions for a wider range of higher-density housing and small homes. These provisions include the following:

- Smaller minimum lot size
- Higher maximum site coverage
- Removal or refinement of courtyard and outdoor living rules
- Changes to maximum building heights

**A note on the “hybrid” population projections developed by the Nelson City Council for  
the purposes of its Long Term Plan, HBA and Housing Bottom Line**

Geoffrey Hayes (Dr)

## Introduction

The *National Policy Statement on Urban Development 2020* (NPSUD2020)<sup>1</sup> requires local authorities (city, district or regional councils) in either “Tier 1” or “Tier 2” urban environments to prepare (and make publicly available) a Housing and Business Development Capacity Assessment” (HBA) every three years. An HBA consists of an assessment of the future demand for and supply of land for housing and business purposes. On completion of an HBA, local authorities are expected to produce “Housing Bottom Lines” (HBLs) for the short-term (next three years), medium-term (between 3 and 10 years) and long-term (between 10 and 30 years). As a “Tier 2” urban environment, the HBA and HBL requirements of the NPSUD2020 are applicable to the Nelson City urban area and are the responsibility of the Nelson City Council.

The methods that local authorities are expected to follow when developing their HBAs and HBLs are outlined in the *National Policy Statement on Urban Development Capacity: Guide on Evidence and Monitoring*<sup>2</sup> as updated in December 2017. An important component of the general methodology for assessing the future demand for land for housing is an assessment of future population growth and, consequently, the demand for dwellings. Local authorities are encouraged to make use of the population projections produced by Statistics New Zealand every two years for this purpose. The NPSUD *Guide* points out the advantages of using Statistics NZ’s projections but notes that:

In some cases, a local authority may want to commission its own bespoke projections from another provider. The rationale for choosing to augment, or depart from, the Statistics NZ projections should be explained in the assessment in a way that can be traced and audited (p.28).

The Nelson City Council has availed itself of the above option by developing a “custom”, or “hybrid”, population projection for the purpose of its Long-Term Plan (LTP) and Asset Management Plan (AMP). The same population and household projection employed for the LTP has also been used in developing Nelson’s HBA and for defining its Housing Bottom Line. The methodology and rationale for Nelson City Council’s population and household projections is contained in the NCC report “Population Growth and Demographics”.<sup>3</sup> Additional population data derived from this report and other sources has also been included in the HBA itself.<sup>4</sup>

### Has NCC followed the government’s guidelines for developing HBAs?

There is some doubt as to whether developing its own in-house projections is the same thing as commissioning “...its own bespoke projections from another provider”. It would seem obvious that by “another provider” the Guide on Evidence and Monitoring of the NPSUD has in mind academic

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<sup>1</sup> Accessed at: <https://www.hud.govt.nz/urban-development/national-policy-statement-on-urban-development-nps-ud/>.

<sup>2</sup> Accessed at: <https://environment.govt.nz/assets/Publications/Files/FINAL-NPS-UDC-Evidence-and-Monitoring-guide.pdf>.

<sup>3</sup> Available as an attachment to the HBA for Nelson City as presented to the meeting of the NCC Urban Development sub-Committee 29 July, 2021. As accessed at: [http://meetings.nelson.govt.nz/Open/2021/07/UD\\_20210729\\_AGN\\_3397\\_AT.htm](http://meetings.nelson.govt.nz/Open/2021/07/UD_20210729_AGN_3397_AT.htm)

<sup>4</sup> Ibid.

or research institutions. There is nothing in the Guide that permits or encourages a local authority to make “do-it-yourself” projections. Indeed, the guide discourages “ad hoc” methods.

So far as can be established from the report “Population Growth and Dynamics”, the NCC did not commission “another provider”, but rather requested comments from an economic consultancy (Infometrics) after it had prepared its own projection. Subsequently, adjustments were made on the basis of the comments received. The principal author of the projections was Nelson City Council, not Infometrics or any other “provider”.

The NPSUD2020 specifies that an HBA must:

- a) Set out a range of projections of demand for housing in the short-term, medium-term, and long-term; and
- b) Identify which of the projections are most likely in each of the short-term, medium-term, and long-term; and
- c) Set out the assumptions underpinning the different projections and the reason for selecting the most likely; and
- d) If those assumptions involve a high level of uncertainty, the nature and potential effects of that uncertainty. (p.23)

In their approach to addressing these requirements, the NCC has presented a range of population projections, which includes Statistics NZ’s “high”, “Medium” and “low” variants based on the 2013 census population, along with the NCC’s own “hybrid” projection. Thus, four projections were presented and compared.

However, the NCC report does not “set out the assumptions underpinning the different projections” and justify why the NCC’s own “hybrid” projection is the “most likely” by comparison with the other projections. What the NCC report does is to attempt a “forecast” of the future population of Nelson based on the possible economic impact of the COVID-19 pandemic on Nelson’s economy. The Report presents a framework purporting to show how economic aspects affect population change (Figure 4). Unfortunately, an important omission in the framework is out-migration (within NZ) and emigration (outside NZ). According to the NCC’s model, migration is one-way only: people migrate in but never migrate out. This is demographically naïve as well as inconsistent with the history of migration in Nelson.

That NCC developed a forecast rather than a population projection is confirmed by the fact that they turned to an economics consultancy for endorsement of their approach. Infometrics is explicitly an *economics* consultancy. Although its website refers to “demographic” projections, Infometrics specializes in forecasting. As its website states:

The Infometrics Demographic Projection model is based on a conventional cohort component approach, meaning we consider how births, deaths, migration and household formation affect the population at each stage of life. However, our key point of difference is that we use our regional

employment forecasts to inform our net migration projection. This means that our projections reflect both demographic processes and the economic prospects of an area.<sup>5</sup>

Clearly, infometrics' "model" is a forecasting tool, not specifically a population projections programme as understood by demographers and implied by the NPSUD guide.

Although a projection is not in itself a *forecast* (because it does not assign a probability to any one projection) a forecast requires a prior projection as its basis.<sup>6</sup> This means that even if NCC engaged in "forecasting" it is obliged under the NPSUD Guide to set-out the assumptions of the projection that underlies the forecast it is making. Unfortunately, the NCC Report misunderstands what is meant by the term "assumptions".

When the NPSUD refers to the "assumptions" underpinning the projections, it is clear from the context that the term "assumptions" is being used as it is used by demographers when conducting projections. As such, assumptions refer very specifically to the detailed inputs that are required by computer programmes designed for the purpose of making population projections. Examples of inputs include: age-specific birth and death rates (the latter normally derived from a life table) and their changes through time, sex ratios at birth, age- and sex-specific net migration rates (or numbers). As outlined in the Comments prepared by Natalie Jackson Demographics Ltd.,<sup>7</sup> the NCC Report frequently confuses **rates** and **numbers**. The absolute numbers that are produced by population projection software are normally an output, not an input, although net migration may be input by numbers disaggregated or distributed by age and sex or by age-sex specific rates.

Nowhere in the NCC's Report do we find assumptions set-out in the manner expected in a report on population projections. For example, the Report presents a graph (Figure 7) of the "live births assumptions" by Statistics NZ's three population projections variants; but these are not assumptions in the sense of inputs to the projections but rather the numbers of births that would result from the birth rates (Total Fertility Rate and age-specific rates) that were used as inputs. The number of births is a function of both the fertility rates and the age structure of the population and cannot be known until the projection programme has been run.

### Concluding comments

The population projections prepared by the Nelson City Council for the purposes of its Long Term Plan, Housing and Business Assessment (HBA) and Housing Bottom Lines do not meet the normal statistical standards applicable to population projections nor the specific requirements laid out in the National Policy Statement on Urban Development Capacity (Guide on Evidence and Monitoring). The NCC neither commissioned projections from "another provider" nor employed Statistics New Zealand's projections but rather conducted its own in-house population forecast.

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<sup>5</sup> See: <https://www.infometrics.co.nz/product/demographic-projections/>

<sup>6</sup> This note does not address the economic aspects of the NCC/Infometrics forecast, other than to say that the expected economic consequences underlying the forecast were far less severe than expected. For example, the "recession" only lasted one quarter.

<sup>7</sup> See Natalie Jackson Demographics Ltd "Comments on the Nelson City Council's Report 'Population Growth and Demographics'".

While Councils are permitted to commission “bespoke” projections from another provider, any departure from Statistics New Zealand’s projections should be explained “...in a way that can be traced and audited.” Given that the NCC’s Report “Population Growth and Demographics” does not in fact permit the results of its projection to be “traced and audited”, it does not meet the requirements of the NPSUD.

The reason why the NPSUD stresses the need for Territorial Authorities to set-out the assumptions underlying any population projection that it uses to determine its HBA or Housing Bottom lines is obvious: **transparency**. In so far as Councils may compete for government funding on the basis of their projected demand for housing, the assumptions used by all councils must be open to scrutiny—both by other councils and the central government as well as other stakeholders. In the case of Statistics NZ’s projections, the basic assumptions used for all regions and the country as a whole are set-out on its website.<sup>8</sup> At a minimum, this is what all Councils or its provider of projections should do. However, the NCC has not done this.

In addition, the NCC Report on its population forecast contains a number of basic demographic errors, many of which have been identified in the comments prepared by Natalie Jackson Demographics Ltd.

Because the Nelson City Council’s projection is “inherently flawed” in a demographic sense,<sup>9</sup> and fails to meet the requirement of the NPSUD Guide on Evidence and Monitoring, the Housing Bottom Line included in the NCC’s Housing and Business Capacity Report of July 2021 (HBA) is of questionable validity. Consequently, the graphs in the HBA that purport to show the intersection point when the “demand” for housing exceeds its “supply” (Figures 1, 23 and 25) cannot be accepted on their face as valid. This includes Figure 25 that suggests the future date by which the intersection of demand and supply of housing might occur if the Maitahi/Bayview (Kaka Valley) development is included on the supply side. Until a set of population projections is developed for Nelson City that is methodologically sound and also meets the NPSUD Evidence and Monitoring Guide, the NCC’s Housing Bottom Line cannot be used as a basis for residential planning and development in the City. Specifically, the HBL (based on a flawed population projection) cannot be used as a valid argument in support of the Maitahi/Bayview Private Plan Change Request (28) or any other planning purposes.

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<sup>8</sup> <http://nzdotstat.stats.govt.nz/wbos/Index.aspx?DataSetCode=TABLECODE7990>),

## A NOTE ON NELSON'S POPULATION GROWTH

Geoffrey Hayes (PhD)

### Introduction

In its publication OUR NELSON (To Tatou Whakatu) Issue No. 76 (16 August 2022), the Nelson City Council (NCC) presents population data for Nelson City pertaining to 1) past population growth from 1996 to 2020; 2) Projected population growth to 2051. The data are presented in the context of Housing Plan Change 29, which would allow the intensification of housing in Nelson. The clear impression is given that the numbers are being provided in order to justify the proposed changes to the Nelson Resource Management Plan.

However, these population figures and their characterization by NCC require critical examination.

#### 1. Past population change

It is noted that Nelson's resident population has increased by 13,400 over the period 1996 to 2020 (24 years). Recent updates by Statistics NZ indicate that the actual increase over this period was 13,700 (from 41,200 to 54,900). However, regional population estimates have now been updated to 2022, providing 26 years of data. The updated estimates show that Nelson's population has increased by 13,300 over this longer period. This is because the population of Nelson dropped in 2021 and 2022.

The NCC characterized Nelson's population change from 1996 to 2020 as increasing "at a rate greater than the national average". This claim is incorrect. Over the period 1996-2020, the national population increased at an average rate of 1.3% per year compared to 1.2% in Nelson. Although Nelson's rate of growth was close to the national average, it was below it, not above it. The data demonstrating this are shown below in Table 1, which shows the rate of growth in the 1996-2020 period (as cited by the NCC) and in the longer 1996-2022 period. In both periods, Nelson's rate of population growth has been below the New Zealand average.

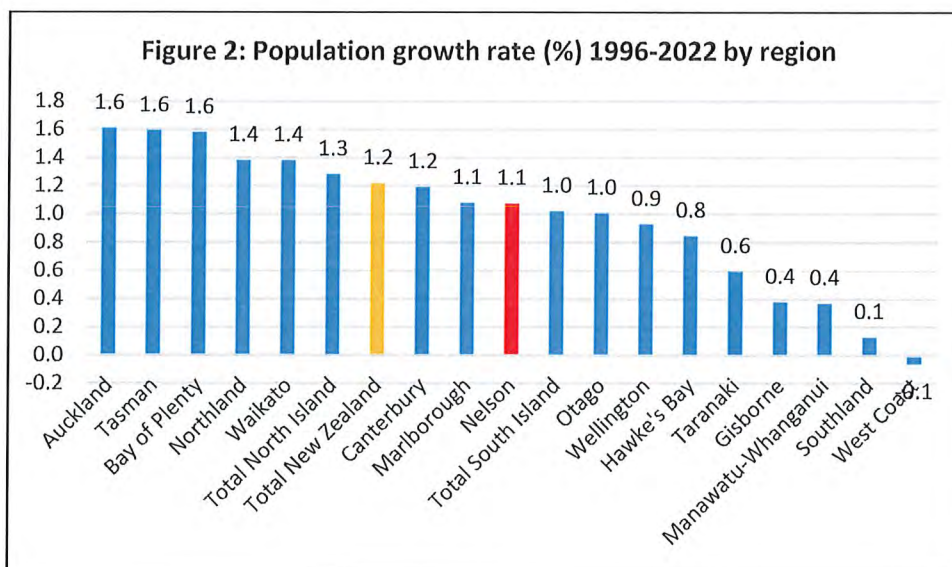
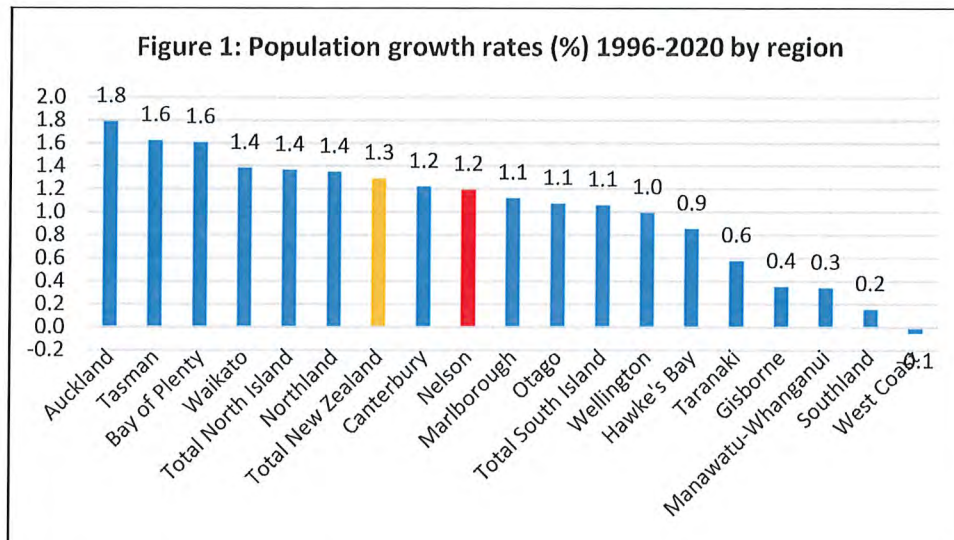
**Table 1: Population growth in Nelson and New Zealand 1996-2022**

| Year                                 | New Zealand | Nelson City |
|--------------------------------------|-------------|-------------|
| 1996                                 | 3,732,000   | 41,200      |
| 2001                                 | 3,880,500   | 42,900      |
| 2006                                 | 4,184,600   | 44,300      |
| 2013                                 | 4,442,100   | 48,700      |
| 2018                                 | 4,900,600   | 52,700      |
| 2020                                 | 5,090,200   | 54,900      |
| 2022                                 | 5,124,100   | 54,500      |
| Average annual growth (%) 1996-2020* | <b>1.3</b>  | <b>1.2</b>  |
| Average annual growth (%) 1996-2022* | <b>1.2</b>  | <b>1.1</b>  |

Source: <https://www.stats.govt.nz/information-releases/subnational-population-estimates-at-30-june-2022-provisional/>

\*Assuming exponential growth. Formula:  $\ln(P2/P1)/t \times 100$

A comparison of population growth rates by region is shown in Figures 1 and 2. Figure 1 refers to the period 1996-2020 while Figure 2 refers to the 1996-2022 period. It will be seen that in Figure 1, Nelson ranks 8<sup>th</sup> out of 18 regions in terms of population growth while in Figure 2 it ranks 9<sup>th</sup>. In other words, Nelson is just below the middle of the range in both periods and is not particularly exceptional among New Zealand's regions. Nelson City contrasts sharply with Tasman District, which *has* had above average growth, or Gisborne at the other end of the scale, which has had significantly slower growth. On the other hand, Nelson's recent growth has been slightly above the rate for the South Island as a whole.



Source: <https://www.stats.govt.nz/information-releases/subnational-population-estimates-at-30-june-2022-provisional/>.

As these data show, the characterization of Nelson's past population growth as "greater than the national average" is not correct over the period cited by the Nelson City Council or the longer period 1996-2022. Nelson City is rather an average region.

## 1. Future population growth

OUR NELSON indicates that Nelson's population is "estimated" to increase by an additional 11,860 people and 6,470 households by 2051 relative to 2020. It is noted that these numbers reflect a 27% increase on 2020. This is somewhat of an exaggeration. According to Statistics NZ, the 2020 population of Nelson was 54,900. An addition of 11,860 people to that number would indicate a 22% increase, not 27%.

In any case, the NCC is "expecting" a population of 66,480 in Nelson by 2051. This "projection" is based on an in-house exercise<sup>1</sup> carried out by the Nelson City Council's staff for the purpose of the Long-Term Plan and Activity Management Plan of 2021. As this report explains, the rationale for NCC doing in-house projections, rather than utilizing Statistics New Zealand projections, was that Statistics NZ had yet to update its population projections given the problems with the 2018 census. However, Statistics NZ has now produced an updated set of projections for the period 2018-2048, which makes it possible to compare the projections carried out by the NCC and Statistics NZ's projections and to consider the most likely scenarios. Table 2 shows the relevant data using the Statistics NZ's time frame of 2018-2048.<sup>2</sup> The same data are shown in graphical form in Figure 3.

**Table 2: Projected population of Nelson 2018-2048 (Stats NZ and NCC compared)**

| Variant                     | 2018          | 2023          | 2028          | 2033          | 2038          | 2043          | 2048          | Change        |
|-----------------------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|
| <b>Nelson City Council*</b> | <b>52,700</b> | <b>54,900</b> | <b>56,100</b> | <b>58,200</b> | <b>60,760</b> | <b>62,900</b> | <b>65,160</b> | <b>12,460</b> |
| Statistics NZ "High"        | 52,700        | 55,700        | 58,400        | 60,700        | 62,600        | 64,300        | 65,800        | 13,100        |
| Statistics NZ "Medium"      | 52,700        | 54,500        | 55,800        | 56,700        | 57,300        | 57,500        | 57,400        | 4,700         |
| Statistics NZ "Low"         | 52,700        | 53,200        | 53,200        | 52,800        | 52,000        | 50,800        | 49,200        | -3,500        |

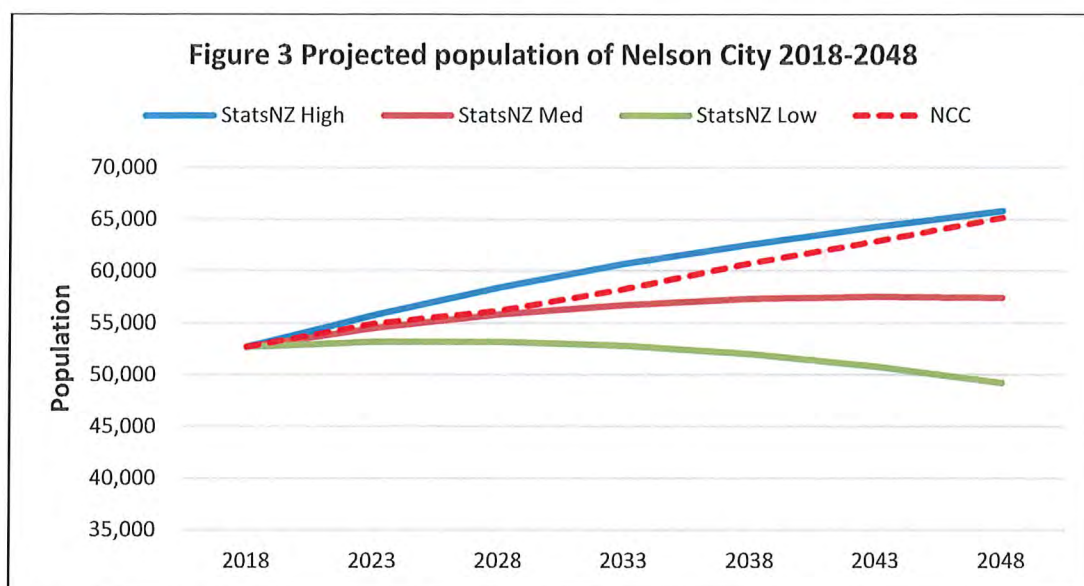
\*starting population adjusted to updated 2018 population.

Source: Statistics NZ: <https://www.stats.govt.nz/information-releases/subnational-population-projections-2018base2048>. NCC: Report on Population Growth and Demographics, Nelson City Council (undated).

As is normal demographic practice, Statistics NZ has provided three projection variants for consideration by planners and other users. The NCC, however, has only made one projection, which implies that only one demographic future is possible in Nelson and other possibilities are not worth consideration. In any case, given the availability of updated projections by Statistics NZ, we now have four scenarios to consider and from which planners can make a reasoned choice about Nelson's population prospects. As is apparent from Table 2 and Figure 3, the NCC's projection tracks Statistics NZ's "medium" variant up to 2028, after which growth is projected to accelerate to almost reach Statistics NZ's "high" projection by 2048. NCC's projected trend (Medium growth followed by high growth) is a result of NCC's attempt to anticipate the short-term effects of the COVID-19 pandemic. As it happened, these effects were over-stated. The economic recession that NCC expected did not occur, although the closure of the border did have a temporary impact on migration patterns.

<sup>1</sup> See Population Growth and Demographics, Nelson City Council (undated).

<sup>2</sup> The NCC's report used the projection period 2020-2050 compared with Statistics NZ's 2018-2048. However, OUR NELSON refers to 2020-2051.



Source: See Table 3

As pointed out by Statistics NZ, the “medium” projection is considered the most appropriate for planning purposes.<sup>3</sup> The “high” and “low” variants are designed to give an indication of what could occur under more radical assumptions—such as an increase in fertility rather than a decrease or an unusually large in-flow of migrants. Stats NZ’s projection assumptions are laid out in Table 4. Unfortunately, the NCC does not specify its projection assumptions in its Population and Demography report, so they cannot be directly compared. However, NCC’s single projection is close to Stats NZ’s “high” projection—at least beyond 2028—so we must assume that they have employed similar projection assumptions.<sup>4</sup>

The key issue to be considered by planners, is whether a projection other than the Medium one can be considered justified. The key variable is net migration. The High projection assumes net in-migration of 500 persons per year compared with 100 persons per year under the low projection. The mortality and fertility assumptions contained in the medium projection should be considered the most likely.

**Table 4: Statistics NZ’s Projection assumption by variable for Nelson**

| Variant/year | Fertility: Total Fertility Rate |        |      |
|--------------|---------------------------------|--------|------|
|              | Low                             | Medium | High |
| 2023         | 1.55                            | 1.65   | 1.75 |
| 2028         | 1.47                            | 1.58   | 1.70 |
| 2033         | 1.43                            | 1.57   | 1.70 |
| 2038         | 1.40                            | 1.56   | 1.72 |
| 2043         | 1.39                            | 1.56   | 1.74 |
| 2048         | 1.37                            | 1.56   | 1.76 |

<sup>3</sup>See:

[https://nzdotstat.stats.govt.nz/OECDStat\\_Metadata/ShowMetadata.ashx?Dataset=TABLECODE8620&ShowOnWeb=true&Lang=en](https://nzdotstat.stats.govt.nz/OECDStat_Metadata/ShowMetadata.ashx?Dataset=TABLECODE8620&ShowOnWeb=true&Lang=en).

<sup>4</sup> However, we do not know which of the main demographic variables (fertility, mortality and migration) is responsible for the similar results. Higher assumed fertility would have a similar effect as higher in-migration, although a different impact on the age structure.

|              | Male Life Expectancy at birth (years) |        |      |
|--------------|---------------------------------------|--------|------|
| Variant/year | Low                                   | Medium | High |
| 2023         | 80.8                                  | 81.3   | 81.8 |
| 2028         | 81.0                                  | 81.7   | 82.4 |
| 2033         | 81.5                                  | 82.4   | 83.2 |
| 2038         | 82.0                                  | 83.1   | 84.1 |
| 2043         | 82.4                                  | 83.7   | 84.9 |
| 2048         | 82.8                                  | 84.3   | 85.7 |

|              | Female Life Expectancy at birth (years) |        |      |
|--------------|-----------------------------------------|--------|------|
| Variant/year | Low                                     | Medium | High |
| 2023         | 84.0                                    | 84.5   | 85.0 |
| 2028         | 84.3                                    | 85.0   | 85.7 |
| 2033         | 84.8                                    | 85.7   | 86.4 |
| 2038         | 85.2                                    | 86.2   | 87.2 |
| 2043         | 85.6                                    | 86.8   | 87.9 |
| 2048         | 86.0                                    | 87.4   | 88.6 |

|              | Net migration per year) |        |      |
|--------------|-------------------------|--------|------|
| Variant/year | Low                     | Medium | High |
| 2023         | 100                     | 300    | 500  |
| 2028         | 100                     | 300    | 500  |
| 2033         | 100                     | 300    | 500  |
| 2038         | 100                     | 300    | 500  |
| 2043         | 100                     | 300    | 500  |
| 2048         | 100                     | 300    | 500  |

Source: <https://www.stats.govt.nz/information-releases/subnational-population-projections-2018base2048#assumptions>

If the NCC's planners have selected the less probable "High" projection, over the more reasonable "Medium" projection, then it would be appropriate for them to indicate why they believe that net immigration of 500 per year is reasonable and/or desirable for Nelson rather than the 300 assumed under the "Medium" projection.

### Conclusion

Population projections are inherently uncertain; they indicate what is demographically possible given assumptions about births, deaths and migration. Narrowly understood, projections are not forecasts or predictions of what will or probably will occur. Projections show the consequences of changes in demographic variables. This is why demographers make projections in series of three or five, as demographic factors can change and a range of possibilities must always be considered. A projection series allows planners to select a particular projection as the most probable. When a probability is given to a projection, the result is a "forecast", that is, a statement of what is likely.

A projection can also be used in reverse. That is, it becomes an answer to a "what if" question. For example, in the case of Nelson, the question could be put as follows: what would the population be in 30 years time if 500 persons per year (net) migrated into the city while mortality and fertility followed their historical trends. The answer is: the population would reach 65,800 people by 2048.

This is useful information for a planner, but it is not a **prediction** that 500 people **will** in-migrate to Nelson every year.

A population projection can also be used in another way. Say after due consideration by an administration and consultations with citizens a consensus was formed that a population of 65,800 people is desirable. That is, such a population is a policy goal. A projection would show what would have to happen for this goal to be realized. In this case, 500 people per year would have to move into Nelson (net) to achieve this goal, assuming that fertility and mortality would follow historical trends. This could potentially lead to a discussion as to whether other demographic variables could achieve the same result. For example, could that population size be achieved by increasing the birth rate and decreasing the death rate. It will be quickly realized that the increase in the birth rate to the equivalent of 500 new migrants per year is highly unlikely, if not impossible.

Nelson City Council has done the citizens of the city a disservice by presenting only one possible demographic future for the city in order to support their case for a radical change to the housing consent process. In fact, other futures are possible. The NCC has also attempted to close-off discussion about what is the ideal or preferable population for the city by presenting only one projection out of the several possible as if it were a foregone conclusion. The NCC's approach to population issues needs a thorough revision.

# Online submission

This is a submission that was made online via the Council's website.

|                           |                                                                             |
|---------------------------|-----------------------------------------------------------------------------|
| Submitter No.             | S475                                                                        |
| Submitter Name            | Kirsten Roedsgaard                                                          |
| Submitter first name      | Kirsten                                                                     |
| Submitter surname         | Roedsgaard                                                                  |
| Submitter is contact      | Yes                                                                         |
| Email                     | <a href="mailto:kirstenmadfrog@xtra.co.nz">kirstenmadfrog@xtra.co.nz</a>    |
| Wish to be heard          | No                                                                          |
| Joint presentation        | No                                                                          |
| Trade competition         | I could not gain an advantage in trade competition through this submission. |
| Directly affected         | N/A                                                                         |
| Withhold contact details? | No                                                                          |

## Submission points

| Plan section       | Provision          | Support/oppose | Reasons                                                                                                | Decision sought                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------------|--------------------|----------------|--------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Entire Plan Change | General opposition | Oppose in part | Design is such an important part of our lives and if we get it wrong, it can have devastating effects! | <p>DESIGN IS NEEDED</p> <p>I am partly in favour of intensification in Nelson but it seems like the <b>Plan Change 29 has not really considered the design aspects of this enormous project!</b></p> <p>I believe, like many professionals and other lay people, that for this plan to go ahead NCC needs to do a lot more work towards getting it right! It is as if NCC thinks "one plan fits all!" Well, it doesn't! I fear, that with the current plan, Nelsonians could potentially have multi- storey right next to residential properties of one of two storeys. Now, I cannot imagine anyone keen on that. Also, in the CBD, clever design ideas need to be considered I urge the NCC to engage with professional urban planners, designers and architects for Nelson not only to intensify <b>but also to beautify our city and make it and even more desirable place to live.</b></p> <p><b>Summing it up:</b> NCC must design comprehensive neighborhood plans focusing on the location and look of future buildings, open spaces incl. public and private green spaces, lane ways, playgrounds etc.</p> <p>All this must be carefully considered BEFORE NCC approves the major change plan. You owe this to the citizens of Nelson - it is not all about money and greed... it is ALSO about caring for the people and providing clever design that stands out and will stand the test of time for future generations to enjoy. Clever and thought-through decisions now will benefit everyone.Thanks.</p> |

# RMA Submission Form for Publicly Notified Plan Change 29



Return your submission by 4pm on  
Tuesday 19 September 2023 to:

Senior Planning Administrator  
RMA Plan Submissions  
Nelson City Council  
PO Box 645  
Nelson 7040

(Hand delivery or courier to: Ground Floor, Civic House, 110 Trafalgar Street,  
Nelson 7010 or email to: [environmental.planning@ncc.govt.nz](mailto:environmental.planning@ncc.govt.nz) with plan  
change no.29 in the subject line)

|                                        |
|----------------------------------------|
| OFFICE USE                             |
| Submission No: S476                    |
| Date Received Stamp:<br><br>30/10/2023 |
| NDOCs No: 539570224-16845              |

\*Required

## Submitter Details

|                 |              |        |                                                              |
|-----------------|--------------|--------|--------------------------------------------------------------|
| Full Name*      | Gaile Noonan |        |                                                              |
| Organisation    |              |        |                                                              |
| Contact Person  |              |        |                                                              |
| Postal address* | n            |        |                                                              |
| Telephone*      |              | Email* | <a href="mailto:g.noonan@xtra.co.nz">g.noonan@xtra.co.nz</a> |

## Trade Competition\*

If you are a person who could gain an advantage in trade competition through the submission your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act 1991.

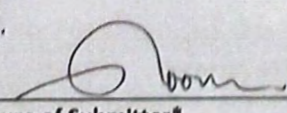
- ☒ I/we could not gain an advantage in trade competition through this submission.
- ☐ I/we could gain an advantage in trade competition through this submission. *if yes, please complete the following:*
- ☐ I/we are directly affected by an effect of the subject matter of this submission that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.
- ☐ I/we are not directly affected by an effect of the subject matter of this submission that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

## Council Hearing\*

- ☐ I/we do not wish to be heard in support of my/our submission.
- ☒ I/we wish to be heard in support of my/our submission. If yes:
- ☐ I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings.

## Public Information

Please note that your name and address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as council.

  
Signature of Submitter\*

(or person authorised to sign on behalf of submitter - a signature is not required if you make your submission by electronic means)

30 October 2023

Date\*

# RMA Submission Form for Publicly Notified Plan Change 29

The specific provisions of the Proposed Plan Change that my submission relates to are as follows:

- |                                                         |                                                      |
|---------------------------------------------------------|------------------------------------------------------|
| <input checked="" type="checkbox"/> Entire Plan Change  | <input type="checkbox"/> Papakāinga                  |
| <input type="checkbox"/> Residential                    | <input type="checkbox"/> Transport                   |
| <input type="checkbox"/> Inner City and City Fringe     | <input type="checkbox"/> Mapping                     |
| <input type="checkbox"/> Industrial                     | <input type="checkbox"/> Infrastructure              |
| <input type="checkbox"/> Suburban Commercial            | <input type="checkbox"/> Area outside of Plan Change |
| <input type="checkbox"/> Natural Hazards/Climate Change | <input type="checkbox"/> Subdivision                 |
| <input type="checkbox"/> Heritage                       | <input type="checkbox"/> Other                       |

- I/we\*: ☐ Oppose the Plan Change in part  
☐ Support the Plan change in part  
☐ Are Neutral about the Plan Change
- ☒ Oppose the Plan Change  
☐ Support the Plan Change  
☐ Request amendments to the Plan Change

## My submission is\*:

(Include whether you support or oppose the specific provisions or wish to have them amended, and reasons for your views)

First, I acknowledge that planning for the future growth must be done. However, the process undertaken for this plan change is lacking in a number of ways. Specifically, no consultation with the majority of the community and recommendations made through the Future Development Strategy, which was adopted, have not been followed. This has led to a fractured plan change as now proposed.

I oppose all of the plan change 29, as drafted, and request Council to refuse/reject Plan Change 29.

## My reasons follow:

1. The growth projections (being the basis of the proposed plan change) have been publicly challenged by professional persons and should be redone aligning with TDC as per the FDS resolutions and FDS Plan.
2. A Plan needs to be developed with the intended direction and scale of development well socialised with the community before notification, so consideration of community views informs the drafting directions. The current proposed plan did not give the community an opportunity to see the scale and extent of the development proposed. It is very different in scale to what the council had consulted on in plan development stages that the community was last provided with (e.g. maximum of 3 storeys to now 6 storeys).
3. The plan should include a staged approach rather than an scatter gun approach around most of the city.
4. Removing carparking is unrealistic. Acknowledging this is a Government directive, which may, in the future, be revoked or changed.
5. The proposed plan does not demonstrate design with consideration to mental health and well-being – green spaces, neighbourhood parks, sunshine, light etc. Well-being is a local government responsibility.
6. Building high-rise buildings in an unplanned, adhoc manner puts existing low rise environments at risk.

## RMA Submission Form for Publicly Notified Plan Change 29

### Considerations which relate to the above points:

1. Research and confirm growth projections and align to TDC methodology.
2. Develop neighbourhood plans for all areas but prioritise the CBD and work out, slowly over time as growth is proven.
3. Retain and encourage on-site carparking, if developer wishes to include this. Need to consider:
  - i) A potential future Government may change this directive and any local plan change needs to be able to pivot on this item;
  - ii) an aging demographic who require support and care (more lately in-home) which will potentially arrive by vehicle due to equipment needs;
  - iii) People requiring transportation of young children, especially larger families;
  - iv) Consideration of those participating in activities such as sport and music and transporting large objects for this purpose.
4. Good design planning is critical, both for the build itself and the surrounding areas. Consideration of protecting existing environment and not building in a way that removes any existing amenity from neighbouring sites. Therefore new builds could potentially "swamp" an existing environment. Many people now work from home and many are retired. Both spend considerable hours at their home. These should not be compromised in the short term and must be allowed the free space, light, air and sunshine they currently enjoy for well-being.

Finally, any plan change needs to be based around the principles of community living and well-being and not be driven by rules-based thinking but to deliver community outcomes.

Separately to the above I refer to Schedule G – Trafalgar Street-Hathaway Court site.

Hathaway Court was the street name until approximately 2009 when the street was renamed

Hathaway Terrace. This needs to be corrected on any future documentation. Please note that

Hathaway Court is the name of the residential complex bounded by Trafalgar Street, Hathaway Terrace and the Hathaway carpark.

Further page with relative portions of the Future Development Strategy follows.

# RMA Submission Form for Publicly Notified Plan Change 29

I seek the following decision from the Council\*:

*(Give precise details, where amendments are sought, provide details below of what changes you would like to see).*

Withdraw the Plan Change as proposed and resubmit when neighborhood plans and demographics work has been completed and aligned with Tasman District Council.

If a decision is made to proceed to Hearing then opposed in entirety and reject recommendations from Hearings Panel.

## Note:

- 1) This form is only for the purpose of making a submission on Proposed Plan Change 29 to the Nelson Resource Management Plan. It is NOT for making a further submission (i.e., in support or opposition to an original submission) or for making a submission on a resource consent or on Council's Annual Plan.
- 2) It is not mandatory to use either the cover or content sheet of this form, however your submission must be in writing and provide the necessary information as indicated on the form, e.g., what is supported or opposed, the reason why and the decision sought, full contact details, etc.
- 3) Council cannot accept a submission that does not clearly indicate what a submitter wishes Council to do (i.e., Council to make a decision to refuse, amend or accept the Plan Change). Please indicate specific recommendations if amendments are sought. Council also cannot accept a submission that does not relate specifically to the Plan Change. In these cases, the submission may be considered 'Out of Scope' and may not be considered further.
- 4) Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
  - a. Is frivolous or vexatious.
  - b. discloses no reasonable or relevant case.
  - c. would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
  - d. contains offensive language.
  - e. Is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

## RMA Submission Form for Publicly Notified Plan Change 29

The relevant portions of the Future Development Strategy:

- “ notes that officers will prepare principles to guide the staging and rollout of development areas for inclusion in the draft Future Development Strategy and that these principles will be used in the preparation of the implementation plans; and
- 6. notes that infrastructure providers will be consulted during the preparation of implementation plans referred to in Recommendation 5 and that the implementation plans will include preparation of neighbourhood and structure plans; and
- 7. recommends to both councils that they explore the use of Inclusionary Zoning and consider plan provisions that require a range of section sizes, while retaining flexibility over housing typologies built, in housing plan changes and/or plan reviews; “

And

- “E) Recommends to both Councils that they give consideration to how to support the Future Development Strategy Intensification goals through land aggregation including working with Kāinga Ora; and
- F) Recommends to both Councils that there is alignment of their Growth Strategies in terms of modelling and timing;”

And

- “11. notes the importance of neighbourhood plans for the successful implementation of the Future Development Strategy; and
- 12. recommends that officers report back, as a priority, to Nelson City Council on the options for preparing neighbourhood plans to feed into the Nelson Housing Plan Change process; and
- 13. recommends to Nelson City Council that it provides additional resources to enable the neighbourhood plans to be completed;

## Online submission

This is a submission that was made online via the Council's website.

|                                  |                                                                             |
|----------------------------------|-----------------------------------------------------------------------------|
| <b>Submitter No.</b>             | S477                                                                        |
| <b>Submitter Name</b>            | Russell Baillie                                                             |
| <b>Submitter first name</b>      | Russell                                                                     |
| <b>Submitter middle name</b>     | George                                                                      |
| <b>Submitter surname</b>         | Baillie                                                                     |
| <b>Submitter is contact</b>      | Yes                                                                         |
| <b>Email</b>                     | <a href="mailto:rgjmnelson@gmail.com">rgjmnelson@gmail.com</a>              |
| <b>Wish to be heard</b>          | Yes                                                                         |
| <b>Joint presentation</b>        | No                                                                          |
| <b>Trade competition</b>         | I could not gain an advantage in trade competition through this submission. |
| <b>Directly affected</b>         | N/A                                                                         |
| <b>Withhold contact details?</b> | No                                                                          |

## Submission points

| Plan section      | Provision                | Support/oppose | Reasons                                                                                                                                                                                                                                                                                                                                                                            | Decision sought                                            |
|-------------------|--------------------------|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|
| Residential Zones | General Residential Zone | Oppose         | We vehemently object to our superb views being completely ruined when obscured by any high rise buildings or additions to existing buildings. Plus our property value plummeting and ruining our property investment. Our wonderful views along with everybody else is why we chose to live in Atawhai.<br>Also the prevention of sunlight by high rise buildings is unacceptable. | To prevent the intensification of property on Ledbury Road |

## Documents included with submission

None

27 October 2023

Senior Planning Administrator  
RMA Plan Submissions  
Nelson City Council  
PO Box 645  
Nelson 7040

via email: [environmental.planning@ncc.govt.nz](mailto:environmental.planning@ncc.govt.nz)

## NELSON AIRPORT LIMITED - SUBMISSION ON NELSON CITY COUNCIL'S PLAN CHANGE 29

Nelson Airport Limited ("Nelson Airport" / "NAL") at the address for service set out below, thanks Nelson City Council for the opportunity to submit on Plan Change 29 - Housing and Hazards ("PC29"). This letter and appended table provides the substantive detail of Nelson Airport's submission on PC29.

### Background

1. NAL is the owner and operator of Nelson Airport which is a nationally and regionally significant infrastructure asset for the greater Nelson-Tasman region. Nelson Airport is located at the top of the South Island, south-west of the Nelson City Centre. It is one of the busiest regional airports in New Zealand. NAL is also a requiring authority for the relevant designations (Designations DAA1, DAA2, and DAA3) for Nelson Airport.
2. NAL has identified a need for an extension to the existing main runway at Nelson Airport (the northern runway extension), to ensure it can provide for the expected needs of future aircraft types, remove operating constraints experienced by existing aircraft to improve reliability, and improve safety through the provision of Runway End Safety Areas.
3. To achieve this, NAL has lodged with the Nelson City Council a:
  - a) a Notice of Requirement (NoR) application to alter existing designations DAA1, DAA2, and DAA3, and designate additional land;  
  
and
  - b) a Private Plan Change Request ("Plan Change 30" or "PC30") to:
    - i. provide a clear planning framework for NAL and the community regarding activities anticipated within the Airport context through the introduction of a specific Airport Zone; and
    - ii. ensure the contemporary role and function of the Airport, in terms of its strategic importance to the Nelson-Tasman region and country is recognised in the NRMP; and

- iii. provide a consistent approach to managing Activities Sensitive to Airport Noise (ASAN) in the NRMP in order to manage reverse sensitivity effects and ensure communities around the Airport are developed with healthy living environments.
4. PC30 was notified on 10 June 2023 and the submission period closed on 10 July 2023. The further submission period opened on 9 September and closed on 25 September 2023.
5. With the notification of PC29 on 11 August 2023 and the submission period closing on 31 October 2023, it is clear that both PC29 and PC30 are both following very similar process timelines and it is important that any overlap between the two plan changes, and potential conflict and/or impact on each other is understood and addressed to ensure strategic consistency and continuity.
6. NAL is interested in PC29 where any proposed changes may affect the strategic role, direction, or function of Nelson Airport, including the proposed framework as set out in PC30. These interests include the following:

#### Summary of Key Submission Points

- (i) NAL is supportive of the Council's approach in PC29 that avoids the rezoning and intensification of residential areas that are subject to the Airport Effects Control Overlay. However, NAL has identified one small portion of land within the proposed Airport Effects Control Overlay (55dB Ldn noise contour) as sought to be introduced by PC30 that has been proposed under PC29 for residential intensification (**Figures 1-2** below).

It is not considered appropriate or consistent with the strategic direction of the District Plan, as sought to be amended by PC30, for residential intensification (i.e. Activities Sensitive to Airport Noise or 'ASAN') to occur within either the operative or proposed Airport Effects Control Overlay. Any overlap between the Airport Effects Control Overlay and PC29 residential intensification areas have otherwise been avoided. This small overlap is likely to be unintended and a minor anomaly. Regardless NAL seeks to correct this matter through the relief sought by this submission.

However, the new proposed District Wide Objectives and Policies that relate to natural hazards (and new rules) are confined to only apply to zones that are subject to

residential intensification (Objective DO2.2), despite PC29 seeking amendments for Industrial Zone rules (such as INr.59 – INr60F). The new objectives and policies should apply to all zones impacted by the new rules, to ensure for example that there is a nexus between the amended rules introduced in the Industrial zone and associated objectives and policies. In addition, greater recognition of nationally and regionally significant infrastructure is sought in some of the proposed new natural hazard objectives, policies and rules to better reflect its strategic role.

- (iii) The detailed submission points are set out in the attached schedule.

Dated 27 October 2023



.....

**ADDRESS FOR SERVICE:**

Nelson Airport Limited  
c/- Planz Consultants  
PO Box 1845  
CHRISTCHURCH  
Attn: Matt Bonis  
e-mail: [matt@planzconsultants.co.nz](mailto:matt@planzconsultants.co.nz)

| Submission Schedule – Nelson Airport Limited |                      |                                                                                                                                                        |                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                     |  |
|----------------------------------------------|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| NAL Submission ID                            | Section of PC29      | Specific Provision                                                                                                                                     | Support / Oppose       | Reasons                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Relief Sought                                                                                                                                                                                                                                                       |  |
| 1                                            | Planning Maps Zoning | Identified areas for General, Medium, and Higher Density residential zoning under PC29 where also located within the proposed Airport Effects Overlay. | Support with amendment | <p>There is a small portion of land where the proposed Airport Effects Control Overlay (PC30) overlaps with proposed residential intensification rezoning under PC29 (see Figures 1-2 in the submission showing the approximate area affected)</p> <p>It is not considered appropriate or consistent with the strategic direction of the District Plan for residential intensification (i.e. activities sensitive to airport noise) to occur within the proposed Airport Effects Control Overlay.</p> <p>This has been specifically avoided for all areas of PC29 and is it considered that this small overlap is likely to be unintended and a minor anomaly but one that that should be corrected.</p> | That any land proposed to be zoned for General Residential, Medium Density Residential or High Density Residential under PC29 retains its existing zoning where that land is also located within the proposed Airport Effects Control Overlay area subject to PC30. |  |
| 2                                            | Planning Maps Zoning | All existing residentially zoned areas identified as excluded from the residential intensification provisions within                                   | Support                | These areas have been specifically excluded from further intensification under PC29 due to their location either entirely or partly within various overlays including the proposed Airport Effects Control Overlay,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | With the exception of the relief sought in ID1 above, retain all existing residential zonings in areas that are located outside PC29 residential intensification areas.                                                                                             |  |

|   |                        |                                                              |                        |                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                       |
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|   |                        | PC29 e.g. Tahunanui and Monaco areas.                        |                        | liquefaction overlay, flood area overlays and inundation overlay.<br><br>Consequently, they have been identified as being unsuitable for further intensification as a permitted activity beyond what is provided for under their current zoning permitted rules.<br><br>NAL supports this strategic approach particularly as it relates to recognising and managing the role and function of Nelson Airport. |                                                                                                                                                                                                                                                                                                                                                       |
| 3 | Planning Maps - Zoning | Exclusion of Open Space and Recreation Zones from PC29 scope | Support                | NAL supports the exclusion of the Open Space and Recreation zone from the scope of PC29, and considers that in any case, it is not appropriate to intensify that zone for residential development as it is not intended for long term/permanent accommodation, residential activities or intensification.                                                                                                    | With the exception of the relief sought in ID1 above, continue to exclude all OSR zonings from the scope of PC29.                                                                                                                                                                                                                                     |
| 4 | DO2.2 Natural Hazards  | Objective DO2.1-2.2<br>Policies DO2.2.1 – DO2.2.18           | Support with amendment | All proposed District Wide objectives and policies for Natural Hazards under PC29 apply to selected residential zones only as follows: <ul style="list-style-type: none"> <li>• General Residential</li> <li>• Medium Residential</li> <li>• High Density Residential Zone</li> <li>• Inner City Residential Zone</li> </ul>                                                                                 | Amend Objective DO2.1 as follows:<br><br><i>natural hazards: all zones except General Residential Zone, Medium Density Residential Zone, High Density Residential Zone, Inner City Residential Zone, <del>and</del> Suburban Commercial Zone, <u>Industrial Zone, Residential Zone: Standard Area, Comprehensive Area and Lower Density Area.</u></i> |

|   |                       |              |                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|   |                       |              |                        | <p>• Suburban Commercial Zone</p> <p>However, changes have been made to natural hazard overlay areas that extend beyond these selected zones e.g. new flooding and liquefaction overlays apply to industrial zones and existing residential zones (where not subject to intensification changes under PC29).</p> <p>There are new rules regarding natural hazards that apply in Industrial Zones as well as existing residential zones (e.g. Tahunanui) that do not presently link through to the new District Wide Objectives and Policies for natural hazards.</p> <p>It is considered that the scope of these new objectives and policies should apply beyond the listed zones to cover all zones affected by new natural hazard rules.</p> | <p>An environment within which adverse effects of natural hazards on people, property, and the environment are avoided or mitigated</p> <p>And</p> <p>Amend Objective DO2.2 as follows:</p> <p>DO2.2 natural hazards: <i>General Residential Zone, Medium Density Residential Zone, High Density Residential Zone, Inner City Residential Zone, and Suburban Commercial Zone, Industrial Zone, Residential Zone: Standard Area, Comprehensive Area and Lower Density Area.</i></p> <p>Risks to Whakatū Nelson's people, property and infrastructure from natural hazards, including the effects of climate change, are recognised and managed and significant risk is avoided.</p> |
| 5 | DO2.2 Natural Hazards | Policy 2.2.6 | Support with amendment | <p>Policy 2.2.6 is an enabling policy that provides specific direction around the potential use of hard protection structures e.g. sea walls, stopbanks, for the purpose of mitigating and managing natural hazards.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <p>Amend Policy 2.2.6 as follows:</p> <p><i>flood hazard: hard protection structures</i></p> <p><i>Support the use of hard protection structures for flood mitigation purposes</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

|   |                          |                |                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|   |                          |                |                        | <p>Nelson Airport is identified as nationally and regionally significant infrastructure and is located in an area that is subject to natural hazard overlays and risk. The risk to any strategic and critically important infrastructure is sufficient to warrant broader consideration of options for managing and mitigating the effects from natural hazards which may or may not result in the potential need for hard protection structures.</p> <p>It is also noted that clause 1 could imply that managed retreat or similar could be interpreted as a 'natural defence option' which is not a practical option in the case of the airport.</p> <p>Increased recognition and clarity is therefore sought in this policy.</p> | <p>in preference to natural features and processes only where:</p> <ol style="list-style-type: none"> <li>1. there is no <u>practical</u> natural defence option;</li> <li>2. the hard protection structure does not create or exacerbate flooding upstream or downstream, or otherwise increase flood hazards or erosion;</li> <li>3. the hard protection structure is located, designed, built and maintained to withstand natural processes and the effects of climate change; and</li> <li>4. significant adverse effects, including on the natural character and processes of the river and coastal environment, are avoided or mitigated.</li> <li>5. <u>nationally and/or regionally significant infrastructure would otherwise be subject to significant adverse effects from natural hazards.</u></li> </ol> |
| 6 | DO2.2<br>Natural Hazards | Policy DO2.2.7 | Support with amendment | <p>Policy 2.2.7 provides specific direction around the potential use, and development of land located within flood hazard overlay areas.</p> <p>Nelson Airport is identified as nationally and regionally significant infrastructure and is located in an area</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>Amend Policy DO2.2.7</p> <p>Enable activities and development in the Flood hazard, flood and inundation overlays where:</p> <p>(i) the activity does not increase significant risks of adverse effects from flood hazards to people,</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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|   |                          |                |                        | that is subject to the Flood Hazard Overlay .<br><br>Nationally and regionally significant infrastructure is often located in areas where ongoing mitigation and management of significant risks is required. The current policy is directive in that no increase in significant risk is anticipated at all. In reality, many significant infrastructure projects can increase risk, albeit that the likelihood of risk remains low and can be adequately mitigated. While it is a subtle distinction, it is important that this distinction is recognised in this policy to ensure nationally and regionally significant infrastructure is not unduly constrained or compromised by this policy. | <u>property, infrastructure and the natural environment; or</u><br><br><u>(ii) the activity is to support nationally and/or regionally significant infrastructure while mitigating significant risks of adverse effects from flood hazards to people, property, infrastructure, and the natural environment.</u>                                                                                                                                                      |
| 7 | DO2.2<br>Natural Hazards | Policy D2.2.10 | Support with amendment | Policy 2.2.10 provides specific direction for the subdivision, use and development (including redevelopment) of existing urban areas to locate in the High Flood Hazard, Floodways and Flood Path overlays.<br><br>Nelson Airport is identified as nationally and regionally significant infrastructure and is located in an area                                                                                                                                                                                                                                                                                                                                                                 | Amend Policy DO2.2.10.i<br><br><u>The areas of high flood flow and/or depth can cause harm to people and significant damage to buildings and infrastructure. Where possible the location of activities in these areas should be avoided <b>(except for nationally and/or regionally significant infrastructure that can demonstrate a functional or operational need for those activities to occur in these areas)</b>. It is important that prior to development</u> |

|  |  |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                             |
|--|--|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
|  |  |  | <p>that is subject to the High Flood Hazard Overlay.</p> <p>As above, nationally and regionally significant infrastructure, such as Nelson Airport, are required to locate in areas where ongoing mitigation and management of natural hazard risks are necessary.</p> <p>While ongoing development at Nelson Airport will be necessary for the Airport to remain operationally resilient, Nelson Airport is supportive of Policy 2.2.10's recognition of providing for the use and development of land subject to High Flood Hazard Overlays, where it can be demonstrated that risk to people, property, infrastructure and the natural environment are adequately mitigated, and significant risk is avoided.</p> <p>While Nelson Airport continuously aims to ensure its developments are of high quality, and are resilient to the impacts of natural hazards, Nelson Airport seeks that the Policy expressly recognise the functional and operational needs of nationally and regionally significant infrastructure to</p> | <p><i>consideration is given to the flood hazard and measures are taken to reduce significant risk.</i></p> |
|--|--|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|

|   |                             |                 |                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| 8 | DO2.2<br>Natural<br>Hazards | Policy DO2.2.14 | Support with<br>amendment | <p>continue developing in their existing locations.</p> <p>Policy 2.2.14 provides specific direction around the potential controls, use, and development of land located within a liquefaction overlay area.</p> <p>Nelson Airport is identified as nationally and regionally significant infrastructure and is located in an area that is subject to a liquefaction overlay.</p> <p>The importance of nationally and regionally significant infrastructure, which typically is not associated with habitable buildings but does often require large scale earthworks where the risk of effects related to liquefaction to buildings and people are substantially lower, is sufficient to justify increased recognition in this policy.</p> | <p>Amend Policy DO2.2.14 as follows:</p> <p><i>Liquefaction hazard: subdivision, use and development</i></p> <p><i>Control subdivision, use and development within the Liquefaction Hazard Overlay to ensure that:</i></p> <ol style="list-style-type: none"> <li>1. <i>the proposed subdivision, use or development anticipated for the site is suitable;</i></li> <li>2. <i>the location, size, design and layout of the subdivision, use or development in relation to the liquefaction risk is appropriate;</i></li> <li>3. <i>the level of risk to people, property and infrastructure from the liquefaction hazard is acceptable; <del>and</del></i></li> <li>4. <i>that site-specific geotechnical assessment and proposed mitigation measures identify and adequately address the level of risk from liquefaction hazard</i></li> <li>5. <i><u>nationally and/or regionally significant infrastructure can continue to function efficiently</u></i></li> </ol> |
|---|-----------------------------|-----------------|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|    |                                                   |                  |                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                               |
|----|---------------------------------------------------|------------------|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9  | RE1.7<br>Medium<br>Density<br>Residential<br>Zone | Policy RE1.7.iii | Support with<br>amendment | <p>Nelson Airport is aware and supportive of the need to provide greater intensified residential housing options for the Nelson region.</p> <p>However, Nelson Airport considers that it is essential that intensification occurs in a manner that promotes well-functioning urban environments, as well as the health and wellbeing of residents, while minimising the effects of reverse sensitivity on nationally and regionally significant infrastructure, such as Nelson Airport.</p> | <p>Amend Policy RE1.7.iii</p> <p><i>Rules that encourage a built-form which can better promote passive surveillance of streets and supporting a high quality built-form which minimises effects on neighbouring properties, <u>as well as reverse sensitivity effects on nationally and/or regionally significant infrastructure.</u></i></p> |
| 10 | RE1.8 High<br>Density<br>Residential<br>Zone      | Policy RE1.8.iii | Support with<br>amendment | <p>As above, Nelson Airport considers that it is essential that intensification occurs in an integrated, and well-considered manner that promotes well-functioning urban environments, as well as the health and wellbeing of residents, while also ensuring reverse sensitivity effects on large-scale, effects-generating infrastructure are well managed and minimised.</p>                                                                                                              | <p>Amend Policy RE1.8.iii</p> <p><i>Rules that encourage a built-form which can better promote passive surveillance of streets and supporting a high quality built-form which minimises effects on neighbouring properties, <u>as well as reverse sensitivity effects on nationally and/or regionally significant infrastructure.</u></i></p> |
| 11 | RE2.1<br>Residential                              | Policy RE2.1.    | Support with<br>amendment | <p>Nelson Airport is supportive of the Council's recognition of an express policy framework that manages noise effects experienced by noise sensitive</p>                                                                                                                                                                                                                                                                                                                                   | <p>Amend Policy RE2.1.viii</p> <p><i>Rules requiring acoustic insulation in new residential units and alterations to</i></p>                                                                                                                                                                                                                  |

|    |                             |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----|-----------------------------|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | Character – Noise           |                                 | <p>receivers in Residential Zones, particularly as noise has the ability to significantly impact residential amenity if not well-managed.</p> <p>However, Nelson Airport seeks that a consistent approach to managing noise from large-scale nationally and/or regionally significant infrastructure be adopted (including for consistency with PC30), and that reference to rules requiring acoustic insulation in new residential units and alterations in areas specifically affected by noise from within the Airnoise Boundary and Airport Effects Control Overlay, as well as minimum site requirements for subdivision in areas affected by Airport noise, be made.</p> | <p>existing residential units, in areas specifically affected by noise from the Port Industrial Area, <u><b>Airnoise Boundary, Airport Effects Control Overlay</b></u> and the state highway.</p> <p>Amend Police RE2.1.ix</p> <p><u><b>Rules requiring minimum site areas for subdivision in areas affected by noise from the Port Industrial Area, Airport Effects Control Overlay and Airnoise Boundary.</b></u></p> <p>Including any consequential amendments necessary to give effect to the above, consistent with the relief sought in PC30 (eg to Rules REr.64, REr.65, and REr.65A).</p> |
| 12 | Residential Zone Rule Table | Rules REr.64, REr.65 and REr.66 | Support with amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>Amend Rules REr.64, REr.65, and REr.66 to be situated within the rule set that applies to all residential zones, including any consequential amendments necessary per the relief sought in PC30.</p>                                                                                                                                                                                                                                                                                                                                                                                           |

|    |                                     |                                        |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                       |
|----|-------------------------------------|----------------------------------------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 13 | Industrial<br>Rule<br>Zone<br>Table | Rules INr.60A –<br>Inr.60F and INr.72A | Oppose | <p>density sizes and requiring acoustic insulation of buildings, like the rules which relate to state highway noise acoustic attenuation, it is entirely appropriate that Nelson Airport's Overlay rules apply to any qualifying building / site in all residential zones, to ensure the intention of those rules are adequately met and any adverse effects are appropriately mitigated.</p> <p>Nelson Airport is identified as nationally and regionally significant infrastructure and is located in an area that is subject to a flood overlay (partial coverage of airport land), inundation overlay (full coverage of airport land) and liquefaction overlay (full coverage of airport land).</p> <p>The introduction of new rules in the industrial zone provisions have the potential to severely constrain Nelson Airport which currently has an underlying industrial zone and also is seeking to pull the equivalent of the Operative Plan Industrial natural hazard rules over to apply to the Special Purpose Airport Zone proposed under PC30.</p> <p>These rules are opposed (as they relate to Nelson Airport land and activities) on the basis that they do</p> | <p>That Rules INr.60A-INr.60F and INr.72A are provided with specific exemptions or exclusions for national and regionally significant infrastructure to ensure Nelson Airport can practically advance future works and activities commensurate to its scale and specific functional requirements.</p> |
|----|-------------------------------------|----------------------------------------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|  |  |  |  |  |                                                                                                                                                                                                                                                                                                                      |  |
|--|--|--|--|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
|  |  |  |  |  | not recognise or adequately provide for the scale and functional requirements of significant national and regional infrastructure which often requires large scale earthworks where the risk of effects from natural hazards to buildings and people are substantially lower compared to other zones and activities. |  |
|--|--|--|--|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

Senior Planning Administrator  
RMA Plan Submission  
Nelson City Council  
PO Box 645  
Nelson 7040  
environmental.planning@ncc.govt.nz

Received: 30/10/2023  
Sub No: S479

NDOCS-539570224-16850

Submitter:

Maureen Anne Doherty

email: maureen.doherty@xtra.co.nz

31/10/2023

I could not gain an advantage in trade through this submission.

I wish to be heard in support of my submission.

I reject PC 29 in its entirety, however if it is not rejected these are my submission points:

**Submission Point : High Density Residential Zones (HDZ)**

- 1.** I oppose the proposed HDZ in residential areas where is no walkable access to amenities (supermarkets, schools with safe crossing of main highway and public transport) as well as where there is risk of increasing natural hazards (floods and land instability).
- 2.** I support the proposed increase in residential density in the city centre so long as it is good quality design led intensification that provides a creative mix of housing types for a diverse population and enables residents to have direct access to shopping and public transport services.
- 3.** If HDZ are approved for some areas, I particularly oppose the proposed HDZ in the Tahunanui hills because of ongoing slope instability and 'run off' that is accelerated during high rainfall periods made worse by aging underground infrastructure on most properties. With the increased likelihood of slips caused by intensification and more frequent weather events this is of grave concern. The fact that there is a lack of essential amenities like a supermarket or public transport that are given as reasons for HDZ is an additional reason for asking the Council to make it GRZ instead.
- 4.** I support the Council working with neighbourhood communities to design innovative and sustainable buildings and green spaces that make far better use of areas of older state type houses that are past their best by date and make a better use of flat land that is often on main roads within easy walking of public transport, schools and the hospital. Homes could be of

varying sizes and hopefully enable mixed age groups including families to be part of a real community that people are proud to be part of.

## **Reasons for my specific opposition to the proposed Tahunanui HDZ**

### **1. Slope instability**

It seems that there was no consideration of geotechnical issues when deciding on the proposed zoning for the area but rather perceived benefits to do with the school and 'public transport'. At public meetings and at a 1:1 with a member of the planning team there was an acknowledgement of slope instability, springs appearing, water run off and dated and failing pipes all over the Tamaki hill which impact on any proposed development in the future. The designated high density area does not exist as separate entity. It is impacted on by everything above it.

Many properties in the proposed HDZ have already experienced slips. Tosswill Road the only exit (Tamaki having only a set of steep steps) has been frequently blocked during heavy rainfall. In 2021, when we began the re build of an old existing house, during the winter there was several months of torrential rain. Just as the excavation for garages was being undertaken water and debris flooded down the hill and across the road. Although we had extensive and expensive geotechnical and Council intervention, at one point our neighbours were afraid they were going to lose their house. An under-runner from above ran under a large deciduous tree near the Council reserve land and we had an emergency arborist help to take it down safely and dispose of the rubbish (photos are available). As recent as 19 August this year, when there was exceptional rainfall over a 24 hour period the well- engineered overflow system was severely tested and there was a clean up needed.

Several homes on the periphery of Tosswill Road and Tahunanui Drive within the proposed HDZ are built on part of the old sea wall. Geotechnical evidence is publically available testifying to "the cliffs being cut in relatively weak rock with stability decreasing as weathering progresses" (paraphrased). Many existing properties have a Condition 1 on their titles and extensive foundations and block retaining walls are required even for single storey buildings. How much more costly would it be if six storeys were allowed? The buildings certainly wouldn't provide accomodation for the 700 odd families in the area living in sub standard housing. It's more likely a developer would hock them off to the highest bidder and that they become an expensive holiday home or used for AirBnB. That does not help Nelson's housing crisis!

### **2. Amenities**

The planning team in public meetings suggested this small section of the Tahunanui hills was chosen for proposed high density because of it's closeness to amenities; the amenities being the school and shops. There is only a dairy and a grog shop with the odd take- away but it is mostly commercial businesses. The nearest planned supermarket will be 2km away and the medical centre is already full. Access to the school or buses is via a steep set of steps and across State

Highway 1. These are not easily accessible for young families, the elderly, or the mobility impaired without a vehicle.

### **3. Traffic**

The Tahunanui Hills is serviced by narrow, winding streets which are inappropriate to service higher traffic volumes which would be inevitable if the proposed HDZ goes ahead. The recently installed speed humps were installed in recognition of the number of incidents and near misses due to the very narrow roads. These are working extremely well to calm the traffic and stop the area being used as a quick cut through to the city centre.

The right-hand exit onto Tahunanui Drive is already problematic. Imagine how much worse it will be if the proposal goes ahead!

### **4. Sunlight, trees and gardens in the Tahunanui Hills**

Most people who live here, or who aspire to live here, do so because of the beautiful trees and bird life along with the sun and views. When we built we deliberately chose a mono pitch roof, installed photovoltaic panels and improved the views for our neighbours both across the road and next door. It seems witless to do other-wise. Unfortunately, developers may not share our green, architectural and sustainable approach to building.

### **The Plan Change 29 Process**

In my opinion, the PC 29 process needs to be paused and re-evaluated before progressing to the hearing stage. This is for the following reasons:

- 1.** I have found the lack of early public engagement and consultation on Plan Change 29 extremely stressful. We found out only by chance when a neighbour phoned us two nights before the meeting at the Trafalgar Centre. There was no direct communication from the NCC. This is simply inadequate!
- 2.** I question why the hearing panel is not made up of independent hearing commissioners for the plan change. There is a distinct lack of trust in the having two councillors with perceived 'conflicts of interest' and that it is a Council- led plan.
- 3.** The forecasts used by NCC for population growth which have informed the intensification requirements are not Statistics NZ medium projections.

### **Given the above, I request the following:**

- 1.** That the Council withdraw PC 29 and have planning staff refine the plan design and follow the proper procedure of consultation and public engagement.
- 2.** That the Council appoint independent hearing commissioners for the plan change.
- 3.** That the Council use Statistics NZ medium projection forecasts and amend its intensification requirements accordingly.
- 4.** That the Council informs all rate payers individually with emails and letters about any changes to their property zoning and to give each rate payer the opportunity to respond.

With my best wishes for the process going forward

Nga mihi nui

Maureen Doherty

Rev 0.1

**MUST be sent or delivered by 31/10/23 4pm to:**

Senior Planning Administrator  
RMA Plan Submission  
Nelson City Council  
PO Box 645  
Nelson 7040  
Environmental.planning@ncc.govt.nz

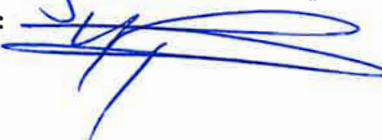
**Submitter (Complete details below):**

Full Name: Yvonne Hoislercy

Address:

Telephone:

Email: yvonnepercyp@xtra.co.nz

Signature of Submitter: 

Date: 27/10/23

Delete as applicable: -

I ~~COULD~~/COULD NOT obtain an advantage in trade competition through this submission.

I ~~WISH~~/DO NOT WISH to be heard in support of my submission.

Firstly, I reject PC 29 in its entirety, but if it is not rejected then these are my points...

**1) The Plan Change 29 Process. I want to acknowledge...**

- a) That I have found it difficult to digest the total effect of the proposed PC 29 and its supporting documentation due to its size and complexity.
- b) That access to a paper copy of PC 29 and the Section 32 reports has not been made available for residents who do not have access to, or the ability to use a computer.
- c) That I have found PC 29 lack of early public engagement and consultation by Council, with its severe implications towards the well-being of existing rate paying residents enjoyment of their properties, extremely stressful and unnecessary.
- d) That I have been put in a position of hoping more qualified citizens than I, will make more comprehensive submissions covering my concerns as to the future of Nelson and its ratepaying residents.
- e) That Council Planning Staff have stated at numerous meetings "This is a 'Broad Brush approach' that requires public submissions to refine the plan". Such a statement implies PC 29 has been prematurely put out for public submissions in an incomplete and inaccurate state that requires the public to learn and understand its entirety, so they can re-design it.
  - i) I am asking Council to withdraw PC 29 and get Council Planning staff to refine the plan design and then put it back out for public submissions.

## **2) Hearing Panel**

- a) I strongly disagree with the make-up of the hearing panel, because of its 'biased' public perception following the vote on Councillor Courtneys proposal to withdraw PC29 at the 14<sup>th</sup> September Council meeting.
- i) I ask the Council to appoint Councillors from either side of the Sept 14<sup>th</sup> vote.

## **3) NCC's Population forecasts**

- a) These are a pivotal aspect for the scale of which Nelson needs to enable intensification and growth. The forecasts used by NCC are not Statistics NZ medium projections, but are over inflated projections that require the scale of intensification to be greater than those of Statistics NZ.
- i) I ask the Council to use Statistics NZ medium projection forecasts, as recommended by the NPSUD Capacity: Guide on Evidence and Monitoring, para 2.1.1 and amend its intensification requirements accordingly.

## **4) Design Lead and Not Developer Lead Growth.**

- a) Nelson is a very special and unique place that needs to be protected with care. It is unlike any other district in NZ. It includes a 'Low Rise' City with a collection of heritage and non-heritage character buildings that have attracted people for generations and been a cherished holiday destination for many New Zealanders.
- b) Residential Neighbourhoods should be protected for future generations to enjoy and new developments thoughtfully designed and planned on a neighbourhood, by neighbourhood basis to maintain the essence of their character.
- c) We need to protect and retain CBD historic facades as an essential part of the character of the Inner City.
- d) Contemporary Black Iron Clad Boxes, built only a few metres from 120-year-old Historic Homes is a thoughtless lack of long-term vision for maintaining the attraction of Nelson for all the future residents and visitors.
- e) Green Spaces, Trees and Landscaping are essential for the look and feel of some of our older neighbourhoods. They help considerably with the wellbeing of the residents and help to provide an essential part of the attraction of Nelson, which must all be considered during developing the growth of Nelson.
  - i) I ask the Council to create a broader level of protection for neighbourhoods beyond the heritage buildings and precincts that still have historic character value from the early settlement years of Nelson.
  - ii) I ask the Council to appoint an Urban Development Agency (UDA) to carefully guide growth and actively facilitate the emergence of cohesive urban neighbourhoods with a variety of high-quality housing choices.

## 5) Sunlight Recession Planes and Shading Effects

- a) Sunlight is a **CRITICAL** part of living in Nelson. It is not called the 'Sunshine Capital of NZ' for no reason. It is well documented that people relocate to Nelson because of the Sun and accept reduced wages called 'Sunshine Wages' for that privilege.
- b) TDC even 'Encourage the Sun into your home'. See <https://www.tasman.govt.nz/my-property/building-and-alteration/heating-and-insulation/energy-efficiency-and-heating-your-home/>
- c) All existing houses built prior to and under the current daylight admission rules will be subjected to the loss of sunlight amenity under PC29 with the following effects: -
  - i) Increased levels of mental health illness, anxiety and stress.
  - ii) Increased levels of damp homes with associated mould and mildew and respiratory illnesses.
  - iii) Shadowing of 'Green Energy' Solar Arrays and Passive Solar Energy Heating.
  - iv) Increased heating costs, air pollution, carbon foot print, are all exasperated due to a large portion of Nelson housing is old, with un-insulated walls and single glazing and open fires were legislated out of use many years ago.
  - v) Reduction in property values and increased financial stress, because the house would be less desirable to live in.
  - vi) Residents, struggling with the cost-of-living crisis may not afford to heat their home.
  - vii) Property owners will be reluctant to invest in making additional new (low rise) infill improvements on their section, with affordable additional units that **COULD** be over shadowed and devalued by a wealthier developer who could afford to build a multi-storey development next door at any time in the future.
- (1) I ask the Council to maintain the AP15 Daylight Admission protection rules to all pre-existing properties, unless the owner gives written approval to the contrary.
- (2) I strongly support the inclusion of Daylight and Sunlight policy statement Para RE2.3.i: The reception of daylight and sunlight to each household unit is a critical component of residential amenity that provides warmth and energy efficiency, and is vital for outdoor activities such as gardening and recreation. To ensure shading effects are minimised, and to ensure there is sufficient space around buildings to allow the admission of daylight to the site, this Plan has provided for daylight controls on all side and rear boundaries. The policy also applies to larger non-residential buildings such as schools or halls. The basic premise is that the daylight and sunlight received on a residential site should be no different whether or not the neighbour is residential. This philosophy applies whether the building is on an adjoining site or across a street.

## 6) Privacy and Outlook

- a) Privacy is a critical part of enjoying a property.
  - i) I support the inclusion of RE2.4.iii, but ask Council to add the following [bracketed] words. 'The building Act controls windows in walls of buildings on or close to boundaries and the outlook rules ensure that residential units **[and their neighbours]** have a reasonable degree of privacy as well as encourage residential units to be orientated towards the street or public open space'.

## 7) Intensification

- a) I strongly oppose the High-Density Residential Zone. It is by no way in character or in keeping with any existing 'Low Rise' Nelson residential suburb and beyond the MDS legal mandate.
  - i) I ask Council to remove HDRZ from the plan completely.
  - ii) I ask Council to apply the new General Residential Zone equally across the entire Nelson district on the introduction of PC29, on the basis that AP15 Daylight Admission protection rules will apply to all pre-existing properties, unless the owner gives written approval to the contrary.
- b) I am strongly opposed to all new 'Green Field' developments being used for only single storey dwellings as it is a complete underutilisation of land that can accommodate increased intensification.
  - i) I ask Council to ensure a minimum of two storey dwellings be built on all new green field developments. Eg Golden Elms in Toi Toi, Ngawhatu Valley and Marsden Valley.
- c) Building holiday apartments that sit empty for long periods, does not solve our intensification, growth and affordability dilemma, and yet it locks up our valuable housing resource. Eg Rocks & Haven Road has many empty apartments.
  - i) I ask Council to consider solutions to mitigate against new-build empty holiday apartments.
- d) I oppose the increase of residential units beyond 4, as a **restricted discretionary** activity that does **NOT** require notification and written approval from neighbours.
  - i) I ask Council to ensure that more than 4 units requires notification, to restrict large 'out of character' accommodation blocks spanning multiple sections, and taking up lots of on street car parking spaces, popping up in a residential street, without warning.
- e) Bigger older properties, could be better utilised and help with our growth if they were more easily allowed to be divided into multi-dwellings.
- f) Building inner city apartments that offer an alternative solution to 'retirement villages', can free up the bigger homes for new families to occupy. The 'retired' occupants may also be less likely to be reliant on a vehicle, which may more closely suit the growth model desired.
- g) Designing Inner-City roof gardens and balconies with green spaces for commercial hospitality use or places for apartment living residents to relax and enjoy the Nelson Sun.
- h) Incentivise rate paying residents to demolish or relocate their house in favour of replacing more units on the same section providing they comply with the suitable character or heritage of the neighbourhood.

## 8) Progressively Phased Intensification

- a) Firstly, Inner City should be the starting place to have the most significant intensification, before forcing it onto the residential neighbourhoods, this can give more time to complete a better design vision for our residential neighbourhoods.
  - i) I ask Council to make better utilization of Car Only spaces, by developing them into shared spaces, with Accommodation overhead. 'Nelsust' highlights 44% of the Inner City as Car only spaces.
  - ii) I ask Council to retain para ICd.11 'The zone enables and encourages an increase in the density and diversity of quality housing in the City Centre by enabling residential activity above ground floor level. It is expected that over time, more people will choose

to live in the City Centre because of its easy access to offices, shops, entertainment and varied open spaces and experiences’.

- b) Secondly, City Fringe would be the next zone to phase in for intensification.
  - i) I ask Council to negotiate and/or incentivise Industry and car yards to relocate, to less essential land that can be better used for accommodation.
- c) Finally, the Residential Zones would be the last area to be phased in, by working out from the City Fringe Zone (and Central Stoke).
  - i) I would support Medium Density Residential Zones (3 storey 11m high) progressively expanding from the CBD (and Central Stoke) **if required and over time**, providing AP15 Daylight Admission Protection rules remain in force for existing properties.

#### **9) Intensification in hazard zones**

- a) I ask Council to apply no greater than General Residential Zoning rules in all Hazard overlays, because these areas have been assessed as vulnerable and given that we are in a climate crisis, with increasing record-breaking weather events, affecting increasing areas of Nelson in ways not seen before then, I believe those areas should be treated with caution.

#### **10) On-street carparking**

- a) Increased intensification will result in more on-street car parking and the narrow streets of Nelson will become a hazard to pedestrians, mobility scooters, cyclists, refuse collection and Emergency Service vehicles. This will cause fracturing of neighbourly relations and communities.
  - i) I ask Council to provide a ‘Comprehensive car parking management plan’ as strongly encouraged by Policy 11 of the NPSUD 2020, to mitigate against these issues.
  - ii) I ask Council to use traffic calming solutions that do not lose on-street car parking spaces. Eg. Speed Humps, instead of Choke Points.

#### **11) Social Housing**

- a) Significant care and attention must be considered with all social housing because there are too many examples across the country where this has resulted in disharmony in communities.
- b) High density living for the homeless and vulnerable will not result in healthy outcomes for all concerned.
- c) Careful design controls from the concept stage onwards, will be rewarded in the long run, with less support required by Mental Health Services, Charity Services, Police and Social Services.
  - i) I would like to see Council working closely with Kainga Ora, to provide a ‘transparent’ way of creating new Social Housing Developments that ‘Fit’ with the long-term design vision of Nelson.
  - ii) I would like to see Council have more fit for purpose controls for antisocial behaviour that affects the existing neighbour’s enjoyment of their property.

## **12) Infrastructure**

- a) I ask the Council to include a plan to mitigate against future drought situations with a greater demand on the same amount of water from the Maitai Dam, for a greater population.
- b) I ask the Council to include a plan to mitigate against the increased capacity requirements for our waste water systems.
- c) I ask the Council to include a plan to mitigate against the increased capacity requirements for storm water.

Senior Planning Administrator  
RMA Plan Submission  
Nelson City Council  
PO Box 645  
Nelson 7040  
Environmental.planning@ncc.govt.nz

Full Name: Philippa Swale  
Address:  
Telephon  
Email: pipswale@outlook.com  
Signature of Submitter:



Date: 31/10/2023

I could not obtain an advantage in trade competition through this submission.  
I wish to be heard in support of my submission.

Firstly, I reject PC 29 in its entirety, but if it is not rejected then these are my submission points:

#### **Submission Point 1: High Density Residential zones (HDZ)**

My key submission points on HDZ are as follows:

I oppose the proposed HDZ II where there is a risk of increasing natural hazards (e.g., floods and land instability).

1. I oppose the proposed HDZ in residential areas where there is no walkable access to amenities (supermarkets, schools and public transport)
2. I support the proposed increase in residential density in the inner city with mixed residential and commercial zones as these areas provide residents with direct walkable access to shopping and public transport services.
3. I support the inclusion of Daylight and Sunlight policy statement Para RE2.3.i: The reception of daylight and sunlight to each household unit is a critical component of residential amenity that provides warmth and energy efficiency and is vital for outdoor activities such as gardening and recreation.
4. If HDZ is approved for some areas, I particularly oppose the proposed HDZ in the Tāhunanui Hills area. I ask the Council to remove Tāhunanui Hills from the proposed HDZ and make it GRZ because of ongoing slope instability in this area, lack of infrastructure, lack of the essential amenities (no supermarkets or public transport) within walking distance, and the increased likelihood of slips directly caused by intensification development and frequent weather events.
5. I ask the Council to make sure all proposed HDZ have walkable access to a supermarket (not a local dairy). For example, Christchurch planners are only proposing HDZ within 800m of a supermarket.
6. I ask Council to ensure a minimum of two storey dwellings be built on all new green field developments. E.g., Golden Elms in Toi Toi, Ngawhatu Valley and Marsden Valley. Infrastructure is easier and cheaper to develop on flat land and would provide more housing without affecting neighbouring properties.
7. I support the establishment of multi storey or underground car parks to free up more land within the inner city for development.

#### **Reasons for My opposition to the proposed Tāhunanui High Density Zone**

##### **1. Slope instability**

I am extremely concerned that there was no consideration of geotechnical issues when deciding on the proposed zoning of the area. MyMy biggest concern is that high density development will increase the potential severity of future slips on the Tāhunanui Hills. The proposed HDZ in the Tāhunanui Hills

is an area potentially affected by significant natural hazard of slope instability. Plan change 29 Housing and Hazards on the Nelson City Council website stated that intensification should not include areas potentially affected by significant natural hazards:

*“Enabling the intensification of development on land currently zoned for residential and commercial uses (Residential Zone, Inner City Zone, and Suburban Commercial Zone), that is not within areas potentially affected by significant natural hazards”.*

There is an instability hazard overlay on 8 of the properties out of the 44 in the new proposed HDZ for Tāhunanui Hills. This includes 4 Tamaki Street, 113 and 111 Tāhunanui Drive, and 13, 15, 17, 23 and 19 Tosswill Rd. Beca’s 2022 report on slope instability said that damage observed along these old sea wall slopes post-August 2022 indicate they pose an elevated risk due to over-steepened slope profile and weathering.

Furthermore, all of the properties covered by the proposed HDZ have a condition (Condition 1) on their property title with the Council. Condition 1 is on the NCC NRMP register and states that the land may be of suspect stability and conditions must be in place including geotechnical reports for any developments. This has resulted in geotechnical reports being completed where property owners have undertaken development. Geotechnical reports have recognised the instability of the steep hill and required extensive foundations and work even for single story buildings. The proposed hazard overlays for slope stability do not include these Condition 1 properties but that does not mean there is no risk now especially with higher intensity of rainfall and intensification of the land. Beca produced a slope stability report in 2021 that stated regarding the Tāhunanui Hills that (emphasis added):

*“The distribution of mapped landslide deposits identifies locations of deep-seated landslides which may be re-activated during heavy rainfall, seismic events, and/or due to construction activities.”*

*Triggers for slope movement may include rainfall, earthquakes, physical and/or chemical weathering, and land development”.*

Many properties in the proposed HDZ have already experienced slips, such as at Tosswill Road where slips have blocked Tosswill Road several times (see Figure 1 attached to this submission). Many owners have geotechnical reports that show areas unsuitable for building and where remedial action may be needed.

Dr M. R. Johnston Consulting Geologist (report produced in 2018) recommends that all developments in hill areas other than minor structures and earthworks involving cut and fill faces less than 1m in height and thickness and/or fill comprising no more than 3m<sup>3</sup>, on sloping ground be subject to geotechnical input so as to minimise the risk of slope instability:

*“It is recommended that the Hill area is requiring geotechnical assessment or Geotechnical assessment requirements for hillsides...”*

*One specific geotechnical condition is C418 that applies to the abandoned sea cliff that extends along the former waterfront from Annesbrook to Tāhunanui. These cliffs are cut in relatively weak rock whose stability is decreasing as weathering progresses. The areas referred to in C418 could be, subject to a revision of its boundaries, incorporated into a slope risk overlay”.*

I am aware of many neighbours in Tosswill Road and on Tamaki Street who have had geotechnical reports prepared due to the potential instability of the hill during their housing developments. The reports have showed only part of sections suitable for building due to land instability. Since development you can now see large cracks on the dirt, concrete and grass around their sections (see Figures 2 and 3 attached to this submission).

I grew up on the Tāhunanui hills (Tamaki Street) and have recently moved back to Stansell Avenue. In the last 36 years I have experienced a number of high rainfall events where access to the streets have been cut off after slips have occurred on both sides of Tosswill Road, Stansell Avenue, Moana Avenue and on Tamaki Street. On one occasion I stood up to my knees in muddy slip mud and debris

helping a neighbour trying unsuccessfully to divert a slip going through their basement. I have often watched water pour down steep Tamaki Street after a storm. I have observed weeping coming through new seal in Tamaki Street from small springs after heavy rain. As stated in the Johnston report while some springs on the Tāhunanui hills have been intercepted by the stormwater system, their distribution is widespread and not all have been controlled, this is certainly my experience. Seismic activity combined with a storm event in a high-density area could be a disaster as mentioned in several reports on the Tāhunanui slump.

Zoning areas on the Tāhunanui Hills HDZ with no resource consent mean that existing stormwater systems which are already compromised and frequently overflow contributing to slips on the Hills will not be required to be upgraded by the developer as part of a considered resource consent process. The impact from the additional development without the developers having to contribute to upgrading overall stormwater could be disastrous for existing residents.

There has been no geotechnical input into what intensification (of up to six-storeys) will do to the stability of the Tāhunanui Hills. Climate change will increase adverse weather events with even greater potential to create slips on the hill.

The Beca Report on slope stability zones (dated 9/12/2021) recommended future work for land earmarked for future development as follows (underlines added):

1. The physical extent of the slope instability overlay may additionally be expanded to include areas of interest outside those included in this study, such as land earmarked for future development.
2. The overlay set out in the Beca report has been prepared from desk study only. refinement of the instability and run-out zones may be completed from field mapping. This step may be applicable for developed areas on land particularly prone to landslides and/or land earmarked for future development.
3. The report does not identify full extent of areas impacted by slope instability across hill slopes.
4. Risk assessments require additional considerations, including likelihood of slope failure and the potential consequences to a particular element at risk. Neither of these are considered in My susceptibility overlay given its primary purpose is to inform the need for further geotechnical assessment.
5. Does not show deep seated failures (i.e., Tāhunanui Slump), nor areas of hill creep. The maximum downslope extent of solid debris difficult to determine.
6. Tāhunanui - An extensive scarp formed along the head scarp of the Tāhunanui slump core below Princes Drive. Deep seated movement impacting multiple residential properties was recorded in this area. Shallow slope failures are additionally observed along the abandoned sea cliff along Tāhunanui Drive and near Port Nelson

As set out in the report above the study to identify the hazard overlays was a desktop study only and there are likely other areas on the Tāhunanui hill not yet part of the hazard overlay impacted by slope instability. As the report it a desktop study it also does not show the deep-seated failures like the Tāhunanui Slump.

## **2. Amenities**

The NCC planning team stated that the Tāhunanui Hills was chosen for the proposed high-density development because of their closeness to amenities. The amenities referred to (being the school and 'shops') are down a steep set of stairs and across State Highway 1, not easily accessible for young families, the elderly, or the mobility impaired without a vehicle. There are no supermarkets within walking distance of the proposed HDZ in Tāhunanui which would be a serious issue for all the HDZ residents with no vehicles. In addition, there is no public transport on the part of the Hill identified for the HDZ and bringing buses around that part of the Hill would be hazardous with nowhere for a bus to stop safely.

## **3. Traffic**

The Tāhunanui Hills is serviced by narrow, winding streets which I feel is inappropriate to service high traffic volumes. Just having a parked car on the roadside causes the many parts of the road to

become one lane. NCC recently installed multiple speed bumps along Tosswill Road to slow down traffic which uses this road as a thoroughfare to and from Nelson City. The road is very narrow and from My time living here, I have seen a number of incidents and near misses due to the narrow winding nature of the road where cars often cross the centre line. In addition, accessing Tāhunanui Drive from Tosswill Road can be very difficult and dangerous including where two people were killed on the intersection with Tāhunanui school while I was attending there and would need significant upgrading before this scale of development could be accommodated on the hill. I consider that the potential traffic produced by high-density development in this area has not been considered in enough detail as to whether it is appropriate. The same is likely for other infrastructure provisions to the area, such as Three Waters servicing. There are a number of reoccurring slip zones onto Tosswill Rd that make it even more dangerous.

HDZ does not require access to parking spaces. This may be sensible in inner city living however, HDZ will aspirote the already often hazardous and limited on street car parking on the Tāhunanui Hills if permitted.

#### **4. Sunlight and Shading Effects**

Sunlight is an essential part of living in Nelson and why many people chose to live on the Tāhunanui Hills. Intensification on the Hill where many Hill properties already have shading issues directly from the hill is another reason for not having high density development on hills. The lack of sunlight could result in existing homes becoming dark and damp with associated mould and mildew.

#### **5. Trees and Gardens in the Tāhunanui Hills HDZ**

There are many established large trees (over 6 metres high) in this Tāhunanui Hill HDZ that are helping stabilise the ground and providing a habitat for our native birds. These will be lost when there is no sun to support their growth or removed to make way for intensive development.

I have counted the large trees in the Tāhunanui Hill high density zone and there are approximately 1200 trees over 6 metres in height. They form part of the green garden canopy. There are direct benefits for maintaining and increasing leaf area index, or green spaces, in My suburb particularly with climate change increasing temperatures and heat extremes. Access to green spaces leads to an improvement in mental and physical wellbeing. Trees help with air pollution. They also play a vital role in storing and filtering water which helps prevent slips on the hill.

Trees provide a habit for our native birds, thus improving biodiversity in our urban setting. The Tāhunanui community has actively been killing rats and I now have established communities of Weka, Tui, Kereru and Piwakawaka. I see these birds every day on my property. Their habit could be destroyed with high density development. Most Tāhunanui Hill residents have productive gardens with fruit and nut trees and vegetables which will no longer be viable with the shading.

#### **7. Intensification**

I am opposed to new 'green field' developments being used for only single storey dwellings as it is a complete underutilisation of land that can accommodate increased intensification without affecting existing suburbs. The inner city should be the starting place for the most significant intensification.

#### **Submission Point 2: The Plan Change 29 Process**

In my opinion, the PC29 process needs to be paused and reevaluated before progressing to the hearing stage. This is for the following reasons:

- I feel there has been a lack of early public engagement and consultation on Plan Change 29. The Plan Change 29 severely affects all Nelson residents however, there was no letter or email from the Nelson City Council.
- I question why the hearing panel is not made up of independent hearing commissioners as it is a council led plan change.

- The forecasts used by NCC for population growth which have informed the intensification requirements are not Statistics NZ medium projections.

Given the above, I request the following:

1. to withdraw PC29 and have planning staff refine the plan design and follow the proper procedure of consultation and public engagement.
2. for the Council to appoint independent hearing commissioners for the plan change.
3. for the Council to use Statistics NZ medium projection forecasts and amend its intensification requirements accordingly.
4. for the Council to inform all rate payers individually with emails and letters about any changes to their property zoning and to give each ratepayer the opportunity to respond.

Thank you for the opportunity to submit on PC29.



Philippa Swale



Figure 1: This property in Tosswill Road will be zoned high density suitable for 6 story apartments. The property has regular slips and has 2 hazard slip overlays.



Figure 2: Trees plants on unstable land on Tamaki Street



Figure 3: Cracks in pathing at my neighbours Tamaki Street property