A Bent Ruler makes a Bent House 22nd May 2024

It appears that 'Dodgy Demographics' may have been at the heart of Council's decision making for years.

The projections used, have been the foundation corner stone for a significant amount of planning decisions made by Nelson City Council.

The Future Development Strategy (FDS), The Long Term Plan (LTP), The Housing and Business Capacity Assessments (HBA), The National Policy Statement on Urban Development (NPSUD), Council Borrowing, New infrastructure, Maitai/Kaka Valley development, Plan Change 29, Demand for Housing, The Airport Runway Extension, New Library, Bridge to Better plus more, have all relied on or been influenced by demographic growth projections.

Government Recommends Evidence Based Monitoring

The Ministry for the Environment National Policy Statement on Urban Development Capacity: Guide on Evidence and monitoring document dated June 2017 recommends local authorities use Statistics NZ medium projections, (which is free and spares the rate payer expensive consultancy fees).

Para 2.1.1 of this guide states ' There are several advantages to using Statistics NZ's projections:
1. The projection methodology is applied consistently across territorial authority areas.
2. Projections are regularly reproduced over time using consistent and internationally accepted methods, rather than an ad hoc basis.
3. The projections are produced by an independent agency with access to the most comprehensive data inputs.

Para 2.1.2 states:
'Should a local authority wish to depart from using a [Statistics NZ] medium projection, the rationale should be explained in the assessment in a way that can be traced and audited'.

NCC chose ***NOT*** to use Stats NZ, but to use its own 'home-grown' ad hoc projections from 2020. For the LTP and 2024 Housing and Business Assessment, NCC commissioned **DOT Consulting** (Dot loves data-DLD) to produce new projections. NCC's in-house projections of 2020 were reviewed by a senior regional demographer who identified serious flaws. The DOT projections, as reported in March 2023, were reviewed by another qualified demographer who reported that despite being a significant improvement on the NCC's 2020 projections, some errors remained. ***To date, the NCC 2020 and the DOT projections have NOT been officially audited and verified.***

M.e. Consulting adds caveat on NCC supplied projections

M.e. Consulting HBA report dated Jan 2024 included in the LTP, adds a caveat and states 'The population and housing projections are based on the DOT loves data [Consulting] projections as prepared for NCC. While we did not audit this, we note that the projections are ***significantly*** higher than the StatsNZ projections for Nelson. The implications of using high(er) projections is that dwelling demand levels used in estimating future sufficiency are ***aggressive*** and it is likely that capacity deficits will emerge'.

When one gets to level three of building a six storey apartment block and finds out that the foundations are not sound, it is prudent to stop building

I strongly request the Long Term Plan, Plan Change 29 and all other associated significant decision making, based on demographics, be paused pending an urgent, full and thorough independent investigation.

Regards
Steve Webster