Notes for speaking at NCC Plan Change 29 hearing

1. Speaking in support of PC29.

2. Following my submission on PC 29 I understand that part of it is accepted. The part that is rejected relates to the potential yield of dwellings as a result of PC29.

3. Nelson and Tasman are recognised as having a shared urban environment by Central Government and hence why we adopted a second joint Future Development Strategy (FDS) in 2022.

4. The FDS provides a blue print for how our shared urban environmental will grow and where it will grow. That growth will be a mixture of Brown field and green field growth. We expect higher densities and intensification from both.

5. We are required by the National Policy Statement for Urban Development to monitor and report on the implementation of the FDS annually, jointly with NCC. What happens in Nelson in terms of providing for dwellings, affects Tasman. So PC29 is very relevant for Tasman District Council.

6. Do have some concerns over the amount of intensification that PC29 will actually enable?

7. The FDS 2022 assumes more housing capacity will be provided in NCC than TDC. NCC provides 55% of the dwelling capacity and TDC provides 45%. Most of NCC's capacity is via intensification and infil. Therefore this PC is crucial for both Districts.

8. Tasman is going to be relying on NCC for capacity, as ours is running out. Our latest LTP population projections show that we will need all the capacity from almost all the Tasman FDS sites in the next 30 years. If our population projections for the next LTP forecast higher growth and Plan Change 29 does not deliver the capacity anticipated, that will mean building on more of Tasman's greenfield land.

Dwelling yield

9. While PC29 may meet demand arising from the population projections used for NCC's current LTP, population projections evolve and shift from LTP to LTP.

10. This is why the FDS used a high growth scenario for demand so that its shelf life would last beyond an LTP, in the event of higher population growth. TDC's forecast population growth has already accelerated between the FDS and latest LTP – surpassing the FDS' medium trend.

11. Of note is the Government's recent update on its 'Going for housing growth' (4th July 2024) proposing a Bill early next year that would require our Councils to use a high growth demand scenario for our 30 year capacity assessments (instead of a medium)

and for FDSs to have a 50 year timeframe, instead of 30 years. So the emphasis in the future appears to be finding even more housing land capacity.

12. I understand from discussions between officers of both Councils, that in order to provide the same housing yield assumed in the FDS for Nelson from intensification, PC29 would need an uptake rate of at least 22% rather than the 15% assumed for the next 30 years in the FDS. (For comparison between 2018 and mid 2021 in Richmond's intensive development area, the number of sites that were intensified for housing, represents approximately 14% over a 30-year period. Although it is acknowledged that the level of development enabled in Richmond is less than that anticipated by PC29.)

13. So how realistic is 22% for Nelson? Or how long will it take for such an uptake rate to evolve in Nelson? And how does this compare to rates of intensification that Nelson has seen in recent years?

14. If this uptake rate proves unrealistic, growth pressures will continue in Tasman. Tasman's population has grown by over 10% between 2018 and 2023, NZ's fastest growing region and the number of dwellings grew by 11% during the same time period. Continued growth pressures will mean more greenfield expansion and more sprawl, as well as more investment required for infrastructure over and above our $409m current bill for growth related infrastructure over the next 30 years.

15. I understand that the Council's consultant (Market Economics), in modelling the potential capacity from PC29, has not considered infrastructure capacity other than assuming that "the appropriate infrastructure would be available to support growth[1]"

16. Planning for servicing to accommodate intensification is critical otherwise it simply will not happen. A developer is unlikely to wait for the next LTP to come around, for the infrastructure to be programmed and then built, before progressing its application. The developer will go elsewhere. These are similar to the servicing issues that Tasman is also currently grappling with, for its forthcoming plan change 81, which will rezone a number of green field and brown field FDS sites, including for intensification.

Servicing

17. PC29 permits intensification if the dwellings are capable of being connected to the water, wastewater and stormwater networks. Otherwise intensification becomes a discretionary activity, with assessment criteria including the capacity of the reticulated network and the timing of works and projects facilitated through the LTP.

18. The rationale with PC29 seems to be – to provide services in line with what is needed, when it is needed, but there is no detail. Has an assessment been done of the likely

[1] (Market Economics evidence section 5.7)

servicing requirements or costs for 3,250 dwellings from intensification?[2] How will intensification in these areas be prioritised? What will happen if developers want to develop elsewhere where there is insufficient servicing?

19. In the Richmond intensive development area, operative since 2018, that intensification is sporadic and widespread. While Council favoured one part of the intensive development area due to better servicing capacity, there has been almost equal development in the other parts of the intensification area.

20. To help provide capacity for the region, PC29 needs to enable more than small numbers of developments. It needs to provide for approximately a net gain of 100 dwellings every year over the 30 years to meet the LTP's population projections[3]. (More capacity would be needed to provide for the higher growth scenario the FDS uses).

21. I understand Nelson has committed just over $48 million for 3 waters intensification network improvements in the LTP over the next 10 years.[4] Is this sufficient, if no real assessment of the servicing demands of PC29 has been undertaken?

22. On site servicing, (such as wastewater pumps), is mentioned as a possible solution, something that Tasman also currently relies upon to an extent for intensification, but connections to the network have to exist for such sites. Has connection availability been assessed for PC29?

23. Stormwater inflow and infiltration is acknowledged as continuing to be an issue for Nelson. [5] Our Council is grappling with stormwater issues for intensification also and may need to rule out areas of Richmond from Plan Change 81 for further intensification. Has the analysis been thorough enough for PC29? Or is the expected dwelling yield wholly unrealistic?

24. In summary we support PC29. We have long advocated for such a plan change in Nelson. Amended PC29 probably doesn't go far enough or isn't ambitious enough compared with the objectives adopted for the FDS. This in itself is likely to mean that NCC does not contribute its dwelling capacity to the region that was envisaged by the FDS. However, as set out in my submission, we still have reservations about the stated capacity PC29 will yield when there appears to be little comfort at this stage, that the servicing demands of such a plan change can be met.

[2] Lawrence Mc Ilrath's evidence page 22 foot note 33
[3] Lawrence Mc Ilrath's evidence para 7.15
[4] Appendix 2 Mr Ruffell's evidence $9.3M water, $31M wastewater $8M stormwater
[5] Mr Ruffell's evidence 5.17