

# Submission Summary

Nelson Tasman Future Development Strategy - Submission #31534

**Mr Grant Wilkins**

Speaker? False

Department	Subject	Opinion	Summary
TDC - Environment and Planning	40 Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?		<p>Please see attached - text copied below (has also included a video attachment - <a href="https://nelsoncity-my.sharepoint.com/:v/g/personal/thuja_johnson_ncc_govt_nz/ESUgNZrYt29Iro5_vgyCoEMB9VairfE-lfYQdZZhEAqfqQ?e=CehVdt">https://nelsoncity-my.sharepoint.com/:v/g/personal/thuja_johnson_ncc_govt_nz/ESUgNZrYt29Iro5_vgyCoEMB9VairfE-lfYQdZZhEAqfqQ?e=CehVdt</a>)</p> <p>Hi I live at 86 Murphy Street, Toi Toi, Nelson and have done for 14 years. In this time I have been flooded so many times I've lost count. The stormwater system goes under ground at start of my property and its constantly overflowing. This bring mud and junk that I have to clean up not to mention some times water over a meter deep. Piping the ditch up to the park 2 property's away and controlling the water there looks to be a good plan. The system is out dated to many houses for it and now a new subdivisions above me will be hooking to system. Please can this be looked at. I fear every rain storm Thanks Grant Wilkins</p>

**From:** Grant Wilkins [REDACTED]  
**Sent:** Tuesday, 12 April 2022 6:57 pm  
**To:** Future Development Strategy  
**Attachments:** received\_1829677180413696.mp4

**CAUTION:** External email.

Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi  
I live at [REDACTED], Toi Toi, Nelson and have done for 14 years. In this time I have been flooded so many times I've lost count.  
The stormwater system goes under ground at start of my property and its constantly overflowing. This bring mud and junk that I have to clean up not to mention some times water over a meter deep.  
Piping the ditch up to the park 2 property's away and controlling the water there looks to be a good plan.  
The system is out dated to many houses for it and now a new subdivisions above me will be hooking to system.  
Please can this be looked at. I fear every rain storm  
Thanks  
Grant Wilkins

Link for video attached:

[https://nelsoncity-my.sharepoint.com/:v/g/personal/thuja\\_johnson\\_ncc\\_govt\\_nz/ESUgNZrYt29Iro5\\_vgyCoEMB9VairfE-IfYQdZZhEAqfqQ?e=CehVdt](https://nelsoncity-my.sharepoint.com/:v/g/personal/thuja_johnson_ncc_govt_nz/ESUgNZrYt29Iro5_vgyCoEMB9VairfE-IfYQdZZhEAqfqQ?e=CehVdt)

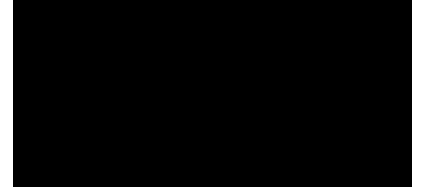
# Submission Summary

Nelson Tasman Future Development Strategy - Submission #31776

**Mark Lile**

Speaker? True

Department	Subject	Opinion	Summary
TDC - Environment and Planning	40 Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?		<p>See attached lengthy document. Summarised: submission from CCKV Maitai Dev Co LP and Bayview Nelson Ltd, landowner of N106, supports its inclusion and requests extension, requests that scoring be adjusted from high to very high, supports inclusion of greenfield land to support housing capacity and concern about the financial feasibility of the intensification proposed in the FDS and the affordability of homes.</p> <p>This submission supports planning for the high growth scenario. Despite having a reported capacity for 14,000 units already zoned, our region has shown that it is already not keeping up with the demand, and has in fact fallen significantly further behind in the last three years. Greenfield development is therefore fundamentally important to the FDS 2022, evidenced by the much larger number of new houses being constructed in Richmond than in Nelson. It there is too much reliance placed on intensification, the community is highly likely to fall further and further behind on available supply, having a negative impact on the housing affordability and community wellbeing. This prioritization would lead to Nelson City not achieving its statutory obligations under the NPS-UD.</p>



14 April 2022

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Tasman District Council  
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## Draft NELSON TASMAN FUTURE DEVELOPMENT STRATEGY

Submission From: *CCKV Maitai Dev Co LP (CCKV); and  
Bayview Nelson Limited (BNL)*

Thank you for this opportunity to contribute to and influence the Future Development Strategy 2022. This is a very important piece of work for the Nelson and Tasman communities given the considerable demand on residential land and housing, caused by regional migration of population and exacerbated by COVID-19. With the borders now reopening, and with conflict in Europe, it is considered that the crises could further worsen.

This submission supports planning for the high growth scenario. Despite having a reported capacity for 14,000 units already zoned, our region has shown that it is already not keeping up with the demand, and has in fact fallen significantly further behind in the last three years.

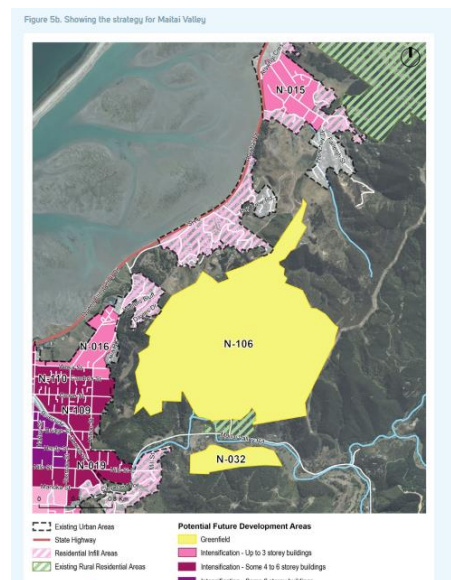
### Background: The CCKV and BNL landholding

CCKV and BNL collectively own the 287-hectares identified as N-106 in the draft FDS. Refer to Figure 5b below inserted below.

Whilst not shown in this Figure, there is 44-hectares of existing undeveloped *Rural-Higher Density Small Holdings* land in the valley floor adjacent to the identified 'existing rural-residential areas' comprising Raphine Way. The balance of the site is within the Rural Zone, with approximately 1.5km of that adjoining the residential zone to the north.

This site is therefore a greenfield opportunity, with rural-residential development of the valley floor already enabled by its zoning and with rural titles of 15-hectares able to be developed within the Rural balance.

The scale of the site combined with the variability in topography also provides the opportunity for a range of housing typologies (type and price) to be developed, to serve a range of needs.



The Raphine Way frontage of the site is 2.6m from Pikimai/Nelson Cathedral. The site also has direct linkages to existing active transport resources, such as Sir Stanley Whitehead Walkway, within Botanical Reserve, above Walters Bluff, and to the proposed new masterplanned subdivision being constructed on Bayview Road.

Aside from a small part of the valley floor that is zoned for *Rural – Higher Density Small Holdings*, this land does not contain high productive values.

The site has connections to the Maitahi/Mahitahi River and Kākā Stream within its boundaries. Combined with the objectives of Project Mahitahi, there are significant opportunities available for enhancing cultural and biodiversity values.

#### The proposal: Draft FDS 2022

The draft FDS 2022 will replace the FDS 2019, as required by the NPS-US which requires a review every three years. The last three years has seen significant additional demand on housing that was not forecasted in the FDS 2019. This demand has resulted in a sharp decrease in housing affordability. This is acknowledged in the draft FDS 2022 which shows the forecasted needs were out by 20%:

*“The 2019 FDS predicted lower rates of growth, needing up to 24,000 homes for the whole region, compared with 29,000 in this draft FDS. This reflects the higher rate of population growth now forecast in the first 10 years. Even with our borders closed our population has still been growing. This is why the FDS is regularly reviewed”.* (p4, Summary Document)

In addition, the draft FDS (p55) states:

*“Housing in Nelson and Tasman is considered severely unaffordable with a significant proportion of households spending more than a third of their income on housing costs ....”* (emphasis added)

Despite what has occurred in the last three years, the draft FDS acknowledges that the current planning/zoning rules currently provide capacity for 14,000 additional homes in Nelson and Tasman. And, that this capacity can be realized on land zoned for a mixed of infill and greenfield development (p55, draft FDS). Hence the draft FDS says *“we are not starting from scratch”*. However as noted above and acknowledged further below, this zoned capacity has seemingly provided little relief in terms of housing supply over the recent years. According to the “National Policy Statement- Urban Development Annual monitoring report 2020/2021 (Report R26304, 9 November 2021), there were ‘106 new residential sections’ created in Nelson in the 2020/2021 year, 83 of which were greenfield, 10 were backyard infill and 13 were redevelopment sites. This not only demonstrates the importance of greenfield, but also highlights the percentage expected from brownfield intensification, and the total supply made available to the Nelson market in that calendar year. This was a 50% drop from the previous year. The report also highlights that there is an increasing percentage of new attached dwellings, such as retirement village units. Looking also at the numbers of building consents for dwelling issued between Nelson and Tasman, Tasman had approximately 300% more than Nelson from June 2020 to June 2021, attributed to the greenfield developments.

The draft FDS outlines a proposal of consolidated growth focused largely along State Highway 6, to provide for *‘sufficient housing capacity’* under the high growth scenario. The draft again seeks to

prioritise intensification but “with greenfield expansion still necessary to meet expected demand” (p6, Summary Document).

For Nelson, 65% of growth is expected to be through intensification and 35% is expected to be through greenfield. This weighted reliance on intensification is specifically identified as a disadvantage of the draft FDS as:

*“There is uncertainty over the rate at which the local development market will take up intensification opportunities”.* (p12, Summary Document)

The risk of reliance or focus again on intensification as per the FDS 2019 is also acknowledged in the draft FDS 2022:

*“This option was not progressed as it was unable to provide enough feasible capacity in the short to medium term under the high growth scenario”* (p14, Summary Document, emphasis added)

Likewise, the Draft FDS highlights the likely slow uptake of intensification:

*“It is important to remember that intensification will not happen all at once, and we have assumed that only 15% of potentially suitable sites will be developed over the next 30 years using conservative estimates about the density of development that might occur. Not everyone will want to redevelop, and for those that do, it will take them time to find the right type of sites. Not everyone will want to live in higher density housing either and it will take time for demand to grow. Because the rate of intensification is generally slower, we need to make sure that we also provide opportunities for large-scale development in greenfield areas. Those opportunities will enable new communities to be developed efficiently and provide the volume of new housing we need to meet demand over the short, medium and long term”* (p28, draft FDS)

Another significant reason for the slow uptake will be the feasibility in financial (\$) terms, which is considered to be a very real and significant issue not addressed in the draft FDS 2022. This submission addresses that constraint later in this submission.

The identified greenfield site N-106 comprises the land the subject of Plan Change 28, by CCKV and Bayview Nelson. This site, as well as Orchard Flat (N-032) are included in recognition of “their close proximity to Nelson City Centre and ability to provide for new community of approximately 1,100 homes at the north-eastern edge of the city” (p34, draft FDS).

In terms of implementation of the final FDS, this would involve the “structure planning in greenfield locations” which would lead also to infrastructure planning and amendments to the Resource Management Plan (p66, draft FDS). This is the same method used in the provision of newly rezoned land in the Stoke Valleys, formulated and proposed as Private Plan Changes.

The selection of N-106 as a greenfield site within draft FDS 2022 has resulted from careful consideration of a large number of options, and using a Multi Criteria Scoring system as addressed below.

## Multi Criteria Scoring (Appendix 4: Technical Report)

Each of the criteria are identified and discussed below.

### ***Urban Growth and Form***

1. Level of accessibility by public and active transport to essential services, employment, education and social opportunities

Score in the draft FDS: **High**

Submission: **Very High**

The close proximity of this site to the Nelson City Centre and the existing direct linkages available to existing active transport cause the N-106 to score *High* against this criteria. It is considered that the score could have equally been *Very High*, given that Orchard Flats (Maitai Valley) (N-32) scored *Very High*, with N-106 site having essentially the same accessibility qualities as N-106.

2. General accessibility by private vehicle to employment, education and social opportunities.

Score in the draft FDS: **Very High**

Submission: **Very High**

As mentioned previously, N-106 is located 2.6km from Pikimai/Nelson Cathedral, and so in very close proximity to a number of education facilities, employment, social and community activities. It is for this reason that this site has scored *Very High*.

3. Ability for a range of housing types to be provided.

Score in the draft FDS: **High**

Submission: **Very High**

The assessed *High* score under this criterion is considered to be incorrect, with *Very High* being the more accurate assessment. The *High* score is also surprising given the specific provision and enablement of a range of housing typologies in PC28. Many of the other assessed *Very High* scores relate to growth opportunities / sites that are far less able to provide for the same range of typologies as N-106.

4. Level of demand.

Score in the draft FDS: **Very Low**

Submission: **Very High**

Section 6.2.3 ‘*Scoring and Weighting*’ (Technical Report, p47) states that criterion 4 only applies to “existing urban zoned land” to align with Policy 5(b) of the NPS-UD. That is not however what Policy 5(b) states. Policy 5(b) requires that RPS and district plans applying to tier 2 urban environments enable heights and density of urban form commensurate with the greater of relative demand for housing and business use in that location. It does not say “existing”, and importantly, says “enable”.

The Weighting System used has, by default, incorrectly awarded N-106 with a negative weight which has misrepresented the purpose of the weighting system when comparing options. The key issue is “Level of Demand”. The demand for land in and around Nelson City is *Very High*, and equally *Very high* on Bayview Road. Although there is not an available supply, this does not mean there is no or low demand. The opposite is true.

PC28 proposes to enable heights and density of urban form to meet current and forecasted *Very High* demand.

## ***Development Capacity***

### 5. Scale of proposal

Score in the draft FDS: **Very High**                      Submission: **Very High**

The scale of the subject site N-106 and its relative opportunity to provide for growth is significant and so can clearly justify the Very High assessment.

### 6. Capacity to deliver

Score in the draft FDS: **Very High**                      Submission: **Very High**

PC28 has been put forward by a very experienced and active group of companies that have a proven track record for delivering residentially masterplanned projects. The breadth of expertise and experience is Very High.

## ***Infrastructure***

### 7. Efficiency of supporting transport infrastructure

Score in the draft FDS: **High**                              Submission: **High**

The location of this site with existing transport connections to the City via Ralphine Way, Maitai Valley Road, and Nile Street, and also via Bayview Road and SH6, efficiently supports existing transport infrastructure. Likewise, under this item, the site is very well able to connect to existing and potential new alternative transport modes.

### 8a. Efficiency of supporting stormwater infrastructure

Score in the draft FDS: **High**                              Submission: **High**

A majority of this site involves the Kaka catchment which will involve appropriate management prior to discharge to the Maitai River. This does not lead to any impacts on downstream stormwater infrastructure.

### 8b. Efficiency of supporting wastewater infrastructure

Score in the draft FDS: **Fair**                                Submission: **High**

NCC has gathered a high level of information as to wastewater reticulation infrastructure. Any upgrade required downstream is equally required for and would benefit, intensification projects in Nelson City. This must be seen as an efficient outcome for the wider City.

### 8c. Efficiency of supporting potable water infrastructure

Score in the draft FDS: **Fair**                                Submission: **High**

With the construction of high-level reservoir storage, the subject site can be appropriately serviced. NCC has also identified the need for high level reservoir storage on the Bayview ridgeline to provide capacity for growth and further resilience to the existing urban area. This must be seen as an efficient outcome for the wider City.



9. Efficiency of supporting community infrastructure

Score in the draft FDS: **High**

Submission: **Very High**

With N-106 being in close proximity to Nelson City, future residents will also utilize and support community infrastructure in the City.

10. Reverse sensitivity and human health effects

Score in the draft FDS: **Very High**

Submission: **Very High**

The matter of reverse sensitivity and human health becomes relevant to land options located next to horticulture. This is why the Very High score is supported. This is no highly productive land, and nor is it located adjacent to highly productive land.

***Highly productive land***

11. Impact on highly productive land

Score in the draft FDS: **Fair**

Submission: **Very High**

PC28 is supported by an expert productive values assessment that confirms this land is not highly productive. The *Fair* score is therefore totally incorrect. Ironically, the only small area of flat land in on the valley floor is currently zoned for Rural-Higher Density Small Holdings subdivision (down to 5000m<sup>2</sup>).

***Natural environment***

12. To mana o te Wai

Score in the draft FDS: **Fair**

Submission: **Fair**

PC28 has volunteered best practice water sensitive design as a fundamental part of the provisions that must be followed in any development of the site. Resource consent is required for the associated activities and no consent could be obtained for activities that there are significant adverse effects that cannot be mitigated (Technical Report, p48). The *Fair* score under this criterion must therefore be seen in this context.

13. Terrestrial ecology and biodiversity

Score in the draft FDS: **Fair**

Submission: **High**

PC28 is supported by the Department of Conservation and Forrester & Bird. PC28 also proposed to protect biodiversity values far and beyond the current provisions in the NRMP.

14. Landscape values (ONL, ONF, Coastal Environment)

Score in the draft FDS: **Very High**

Submission: **Very High**

This site is not within an Outstanding Natural Landscape, nor contain an Outstanding Natural Feature. However Kaka Hill is being protected as a part of PC28, again over and above the current provisions of the NRMP.

While not within the 'Coastal Environment' as identified in the NRMP, the northern facing part of the site below the Malvern Hills ridgeline is visible from the coast and so bespoke rules are proposed to

ensure landscape and visual amenity effects are mitigated as a part of future subdivision and building design.

***Climate change and natural hazards***

15. Sea level rise, Inundation (coastal and river) and coastal erosion related natural hazards

Score in the draft FDS: **Fair** Submission: **High or Very High**

It is submitted that this *Fair* score does not adequately acknowledge that this site is not susceptible to SLR and coastal related hazards. Likewise, there cannot be any development that could cause a risk to people within a 100-year period (i.e. through river flooding). How is this assessment different to the Brook (N-289) other such sites that have scored High, or Orchard Flats (N-32) that has scored Very High!

16. Ground conditions (fault hazard, liquefaction risk, and land stability)

Score in the draft FDS: **Fair** Submission: **High**

A majority of density planned within P28 is located within the valley floor area, not at risk from these listed hazards.

***Iwi and hapu values***

17. Sites of cultural significance

Score in the draft FDS: **Very High** Submission: **Very High**

PC28 has now been through the public submission process with submissions received from local iwi, and iwi members, as mostly in support or neutral. Based on that feedback, a *Fair* score does not accurately reflect the opinions of iwi and hapu. Please refer to the submissions on the Council's website.

18. Impact on life-sustaining quality of natural resources and ecosystems

Score in the draft FDS: **Fair** Submission: **High**

As per 17. Above.

***Iwi and hapu development***

19. Potential for commercial development by iwi/Maori trusts

Score in the draft FDS: **High** Submission: **High**

Given that Ngati Koata are a shareholder in PC28, this is an appropriate score.

20. Potential for papakainga development

Score in the draft FDS: **High** Submission: **High**

As per 19 above.

In summary, the follow Table compares the Multi Criteria Scoring contained within the draft FDS 2022 to this submission and that information contained within and supporting the PC28, the formal Plan Change Request.

	1	2	3	4	5	6	7	8a	8b	8c	9	10	11	12	13	14	15	16	17	18	19	20
Draft	H	V	H	VL	V	V	H	H	F	F	H	V	F	F	F	V	F	F	V	F	H	H
Subm	V	V	V	V	V	V	H	H	H	H	V	V	V	F	H	V	H	H	V	H	H	H

Is it submitted that some of the scores in the draft FDS 2022 are incorrect. Overall N-106 scores **High to Very High**, which is why this site (N-106) should continue to form a part of the FDS 2022.

## CONCLUSIONS

### ***Prioritizing Intensification***

The draft FDS 2022 seeks to prioritise Intensification with 65% expect from this format. The Strategy is considered to overestimate the likely supply to be generated in that manner. The “disadvantages” of intensification are essentially acknowledged in the draft FDS, identified above. However potentially one of the most significant disadvantages of intensification will be the costs of the townhouses/apartments constructed from brownfield development land. It is submitted that a large majority of townhouse/apartment development, aside from social housing development, will be financially out of reach for at least 90% of the market.

Intensification will not proceed unless they are feasible. Even on the assumption that the NRMP changes to provide for medium density housing of up to 11m in height and with a much more enabling density standard, intensification will not occur unless it is financially feasible. Relevant costs include:

- The cost of paying for existing high value land in the City;
- The costs of capital (building) on the brownfield site;
- Demolition, including potential extras i.e. asbestos specialists and disposal, and potentially HAIL for existing commercial and industrially zoned land identified in the draft FDS 2022.
- Design (architectural, geotech(?), civil, specialist flooding(?), planning, surveying, structural, legal, landscape, transport, acoustics, fire, etc);
- Consenting Costs – from Council (Resource Consent and Building), which currently would trigger written approval or notification on most residentially zoned infill sites;
- Development Contributions (infrastructure and reserve/neighbourhood);
- Earthworks, retaining, filling (inundation and flood hazards), and DESCP management costs;
- Construction noise and traffic management.
- Construction:
  - New building
  - Civil;

- Landscaping/ fencing
- Developers margin / risk, also taking into account tax and GST payable.

It is extremely difficult to quantify these costs on a generic basis, particularly with increases in land/house values and inflation on building in recent years. Based however on recent marketing and sales, available residential apartments and townhouses now all have a price exceeding \$1,600,000.00, with those projects recently completed. If the same projects were to be constructed today, the price tag would be closer to \$2,000,000.00 due to inflation on building costs and land values also increasing significantly.

What these values show is that intensification will not provide for any form of affordable housing, and will in fact only serve the most affluent of the population.

Whilst inflation costs impact the same on greenfield development, they also have the benefit of economies of scale with single storied development providing the opportunity for a more affordable total housing price, and comprehensive developments providing efficiencies also benefiting total costs.

Greenfield development is therefore fundamentally important to the FDS 2022, evidenced by the much larger number of new houses being constructed in Richmond than in Nelson. If there is too much reliance placed on intensification, the community is highly likely to fall further and further behind on available supply, having a negative impact on the housing affordability and community wellbeing. This prioritization would lead to Nelson City not achieving its statutory obligations under the NPS-UD.

## **2. *Support Private Initiatives as required by the NPS-UD***

Policy 8 of the NPS-UP requires that local authorities are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:

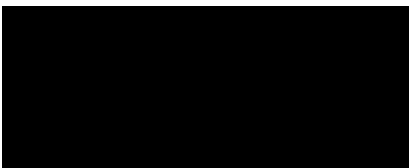
- (a) unanticipated by RMA planning documents; or
- (b) out-of-sequence with planned land release.

It is submitted that this obligation needs to be more clearly recognized and included in Section 16 'Implementation' of the FDS 2022.

We request the opportunity to be heard in support of this submission.

Please contact me if you have any queries.

Yours sincerely,



Mark Lile  
**Landmark Lile Limited**  
*Resource Management Consultancy*

# Submission Summary

Nelson Tasman Future Development Strategy - Submission #31469

**Dr Jozef van Rens**

Speaker? False

Department	Subject	Opinion	Summary
TDC - Environment and Planning	01 Please indicate whether you support or do not support Outcome 1: Urban form supports reductions in GHG emissions by integrating land use transport. Please explain your choice:	Strongly agree	I strongly support outcome 1 as there is a close tie between urban form and transport emissions. However it is far from the only strategy needed to reduce emissions as we must.
TDC - Environment and Planning	02 Please indicate whether you support or do not support Outcome 2: Existing main centres including Nelson City Centre and Richmond Town Centre are consolidated and intensified, and these main centres are supported by a network of smaller settlements.	Strongly agree	I strongly support outcome 2 as low-density developments are a major cause of urban inefficiency as well as seriously compromising or ability to face a low-emissions, and very likely low-energy future. However I do not consider the increased density or slow uptake go nearly far enough to achieve the scale of results needed.

	Please explain your choice:		
TDC - Environment and Planning	03 Please indicate whether you support or do not support Outcome 3: New housing is focussed in areas where people have good access to jobs, services and amenities by public and active transport, and in locations where people want to live. Please explain your choice:	Strongly agree	All planning has to start from the principles of -reducing climate vulnerability and building resilient infra structure -accelerating urban intensification -facilitating enormous decarbonisation of lifestyle and transport -facilitating affordable low emissions transport -facilitating affordable zero carbon housing -reducing inequality and inequity
TDC - Environment and Planning	04 Please indicate whether you support or do not support Outcome 4: A range of housing choices are provided that meet different needs of the community, including papakāinga and affordable options. Please explain your choice:	Strongly agree	we need housing for low income families and young families
TDC - Environment and Planning	05 Please indicate whether you support or do not support Outcome 5: Sufficient residential and business land capacity is provided to meet demand. Please explain your choice:	Strongly disagree	I strongly oppose this. "Meet demand" is the wrong metric to decide the future of our region, and puts much of that future in the hands of people who don't yet live here. It also encourages a growth economy which is environmentally and socially damaging, and has major downsides (e.g. traffic congestion, resource depletion).
TDC - Environment and Planning	06 Please indicate whether you support or do not support Outcome 6: New infrastructure is planned, funded	Strongly disagree	I strongly oppose this as it is growth-focussed (see last answer). Well-planned infrastructure is vitally important, but in a climate crisis, and widespread planetary overshoot, catering for growth is entirely the wrong basis on which to predicate it.

	and delivered to integrate with growth and existing infrastructure is used efficiently to support growth. Please explain your choice:		All planning has to start from the principles of -reducing climate vulnerability and building resilient infra structure -accelerating urban intensification -facilitating enormous decarbonisation of lifestyle and transport -facilitating affordable low emissions transport -facilitating affordable zero carbon housing -reducing inequality and inequity
TDC - Environment and Planning	07 Please indicate whether you support or do not support Outcome 7: Impacts on the natural environment are minimised and opportunities for restoration are realised. Please explain your choice:	Strongly agree	I strongly support outcome 7. These are crucial dimensions of any major planning strategy and deserve high priority.
TDC - Environment and Planning	08 Please indicate whether you support or do not support Outcome 8: Nelson Tasman is resilient to and can adapt to the likely future effects of climate change. Please explain your choice:	Strongly agree	I strongly support this as the impacts of the climate crisis are already upon us, and are almost certain to escalate more extensively – in severity and breadth - than the FDS seems to address. If Outcome 8 is taken seriously, large parts of the FDS are counterproductive, worsening the need for such resilience.
TDC - Environment and Planning	09 Please indicate whether you support or do not support Outcome 9: Nelson Tasman is resilient to the risk of natural hazards. Please explain your choice:	Strongly agree	I strongly support outcome 9 as a prudent approach to planning in any natural environment context. But I have some questions: For Example: The construction of the new housing project "The Meadows" around lower Queen street is, to me, a form of very bad planning. I am originally from the Netherlands and it is very disturbing to see a new housing project within a short distance of the ocean without any dunes or dykes to protect the area against rising sea levels Any increase in sea level and those houses are under water.
TDC - Environment and Planning	10 Please indicate whether you support or do not support Outcome 10: Nelson Tasman's highly	Strongly agree	I give strong but qualified support to outcome 9. I am certainly in favor of prioritising the protection of productive land, but I am opposed to it automatically being flagged for "primary production". Not only does this have a range of meanings (e.g. the online

	productive land is prioritised for primary production. Please explain your choice:		Oxford dictionary says “the production of raw materials for industry”) but “primary production” has often been harmful in the past and may need to take very different forms in the future. E.g. there may be a better case for developing carbon-storing wetlands in some areas. We also need to be able to grow our own food
TDC - Environment and Planning	11 Please indicate whether you support or do not support Outcome 11: All change helps to revive and enhance the mauri of Te Taiao. Please explain your choice:	Strongly agree	I am not qualified to speak on the mauri of Te Taiao but am supportive of measures to enhance it. However I have major doubts that “All change” will necessarily help such revival. I am supportive of the broad outcome but opposed to that implied licence to achieve it. So I would word it differently: All changes must be made in such a way that they help to revive and enhance the mauri of Te Taiao
TDC - Environment and Planning	12 Regarding the FDS outcomes, do you have any other comments or think we have missed anything?		The FDS should, but fails to, take a suitably large and integrative view of the key climate issues; <ul style="list-style-type: none"> <li>• when it is crucial we have innovative, transformative planning (such as TDC’s recent draft Walking and Cycling Strategy) we are presented instead with largely a “Business as Usual” plan;</li> <li>• it talks the talk on responding to climate change but does not come near to really walking the walk, and as such it perpetuates many of the problematic activities we must urgently cease, and is grossly inadequate to safeguard our region’s future;</li> <li>• it should engage with our energy futures and does not (and expressly avoids renewable electricity), and should also address the inevitability of “energy descent” and transitioning to a low energy society;</li> <li>• it is fundamental that it addresses the daunting decarbonisation trajectory set by the IPCC and our Zero Carbon Act, but it does not even recognise it as a significant factor;</li> <li>• to be plausible, the FDS must identify strategies to undertake urban development that has virtually zero carbon housing - critically shown in BRANZ’s world-leading research;</li> <li>• the FDS must address core viability issues around affordable low-emissions transport to service all future development. It is also seemingly unquestioning in accepting the feeble (under 0.5% per year) rate of urban intensification, which renders such intensification all but ineffective in denting our</li> </ul>



			<p>urban and emissions, and as such becomes be a failure of strategy.</p> <ul style="list-style-type: none"> <li>• The FDS is in essence a “strategy” that perpetuates many of our most climate-damaging activities when we critically need strategies that address them with robustness and urgency.</li> </ul>
TDC - Environment and Planning	<p>13 Do you support the proposal for consolidated growth along SH6 between Atawhai and Wakefield but also including Māpua and Motueka and meeting needs of Tasman rural towns? This is a mix of intensification, greenfield expansion and rural residential housing. Please explain why?</p>	Strongly disagree	<p>Only if this mix of intensification/greenfield expansion and rural residential housing follow the principle of deeply engaging with energy; with critical decarbonisation trajectories; transport, with urban development that strongly facilitates the low-to-zero carbon housing critically shown in BRANZ’s world-leading research. It must offer a robust and viable strategy for effective, affordable, low-emissions public transport to service all future development. and propel urban intensification far faster than the feeble 0.5% per year described.</p>
TDC - Environment and Planning	<p>14 Where would you like to see growth happening over the next 30 years? Please list as many of the following options that you agree with: (a) Largely along the SH6 corridor as proposed (b) Intensification within existing town centres (c) Expansion into greenfield areas close to the existing urban areas (d) Creating new towns away from existing centre (please tell us where) (e) In coastal Tasman areas, between Mapua and Motueka (f) In</p>		<p>B intensification within existing town centers</p>

	Tasman's existing rural towns (g) Everywhere (h) Don't know		
TDC - Environment and Planning	15 Do you agree with prioritising intensification within Nelson? This level of intensification is likely to happen very slowly over time. Do you have any comments?	Neutral	Only if the planning starts from the principles of -reducing climate vulnerability and building resilient infra structure -accelerating urban intensification -facilitating enormous decarbonisation of lifestyle and transport -facilitating affordable low emissions transport -facilitating affordable zero carbon housing -reducing inequality and inequity
TDC - Environment and Planning	16 Do you agree with the level of intensification proposed right around the centre of Stoke? Any comments?	Neutral	Only if the planning starts from the principles of -reducing climate vulnerability and building resilient infra structure -accelerating urban intensification -facilitating enormous decarbonisation of lifestyle and transport -facilitating affordable low emissions transport -facilitating affordable zero carbon housing -reducing inequality and inequity
TDC - Environment and Planning	17 Do you agree with the level of intensification proposed in Richmond, right around the town centre and along McGlashen Avenue and Salisbury Road? Any comments?	Neutral	Only if the planning starts from the principles of -reducing climate vulnerability and building resilient infra structure -accelerating urban intensification -facilitating enormous decarbonisation of lifestyle and transport -facilitating affordable low emissions transport -facilitating affordable zero carbon housing -reducing inequality and inequity
TDC - Environment and Planning	18 Do you agree with the level of intensification proposed around the centre of Brightwater? Any comments?	Neutral	Only if the planning starts from the principles of -reducing climate vulnerability and building resilient infra structure -accelerating urban intensification -facilitating enormous decarbonisation of lifestyle and transport -facilitating affordable low emissions transport -facilitating affordable zero carbon housing -reducing inequality and inequity
TDC - Environment and Planning	19 Do you agree with the level of intensification proposed near the centre of Wakefield? Any comments?	Neutral	Only if the planning starts from the principles of -reducing climate vulnerability and building resilient infra structure -accelerating urban intensification -facilitating enormous decarbonisation of lifestyle and transport -facilitating affordable low emissions transport -facilitating affordable zero carbon housing -reducing inequality and inequity
TDC - Environment and Planning	20 Do you agree with the level of intensification	Neutral	Only if the planning starts from the principles of -reducing climate vulnerability and building resilient infra structure

	proposed in Motueka? (greenfield intensification and brownfield intensification) Any comments?		-accelerating urban intensification -facilitating enormous decarbonisation of lifestyle and transport -facilitating affordable low emissions transport -facilitating affordable zero carbon housing -reducing inequality and inequity
TDC - Environment and Planning	21 Do you agree with the level of intensification proposed in Māpua (intensifying rural residential area to residential density)? Any comments?	Neutral	Only if the planning starts from the principles of -reducing climate vulnerability and building resilient infra structure -accelerating urban intensification -facilitating enormous decarbonisation of lifestyle and transport -facilitating affordable low emissions transport -facilitating affordable zero carbon housing -reducing inequality and inequity
TDC - Environment and Planning	22 Do you agree with the location and scale of the proposed greenfield housing areas in Nelson? Please explain why.	Neutral	Only if the planning starts from the principles of -reducing climate vulnerability and building resilient infra structure -accelerating urban intensification -facilitating enormous decarbonisation of lifestyle and transport -facilitating affordable low emissions transport -facilitating affordable zero carbon housing -reducing inequality and inequity
TDC - Environment and Planning	23 Do you agree with the location and scale of proposed greenfield housing areas in Stoke? Please explain why.	Neutral	Only if the planning starts from the principles of -reducing climate vulnerability and building resilient infra structure -accelerating urban intensification -facilitating enormous decarbonisation of lifestyle and transport -facilitating affordable low emissions transport -facilitating affordable zero carbon housing -reducing inequality and inequity
TDC - Environment and Planning	24 Do you agree with the location and scale of proposed greenfield housing areas in Richmond? Please explain why.	Neutral	Only if the planning starts from the principles of -reducing climate vulnerability and building resilient infra structure -accelerating urban intensification -facilitating enormous decarbonisation of lifestyle and transport -facilitating affordable low emissions transport -facilitating affordable zero carbon housing -reducing inequality and inequity
TDC - Environment and Planning	25 Do you agree with the location and scale of proposed greenfield housing areas in Brightwater? Please explain why.	Neutral	Only if the planning starts from the principles of -reducing climate vulnerability and building resilient infra structure -accelerating urban intensification -facilitating enormous decarbonisation of lifestyle and transport -facilitating affordable low emissions transport -facilitating affordable zero carbon housing -reducing inequality and inequity
TDC - Environment and Planning	26 Do you agree with the location and scale of	Neutral	Only if the planning starts from the principles of -reducing climate vulnerability and building resilient infra structure

	proposed greenfield housing areas in Wakefield? Please explain why.		-accelerating urban intensification -facilitating enormous decarbonisation of lifestyle and transport -facilitating affordable low emissions transport -facilitating affordable zero carbon housing -reducing inequality and inequity
TDC - Environment and Planning	27 Do you agree with the location and scale of proposed greenfield housing areas in Motueka? Please explain why.	Neutral	Only if the planning starts from the principles of -reducing climate vulnerability and building resilient infra structure -accelerating urban intensification -facilitating enormous decarbonisation of lifestyle and transport -facilitating affordable low emissions transport -facilitating affordable zero carbon housing -reducing inequality and inequity
TDC - Environment and Planning	28 Do you agree with the location and scale of proposed greenfield housing areas in Māpua? Please explain why.	Neutral	Only if the planning starts from the principles of -reducing climate vulnerability and building resilient infra structure -accelerating urban intensification -facilitating enormous decarbonisation of lifestyle and transport -facilitating affordable low emissions transport -facilitating affordable zero carbon housing -reducing inequality and inequity
TDC - Environment and Planning	29 Do you think we have got the balance right in our core proposal between intensification and greenfield development? (Approximately half intensification, half greenfield for the combined Nelson Tasman region.)?	Neutral	
TDC - Environment and Planning	30 If you don't think we have the balance right, let us know what you would propose. Tick all that apply.	More intensification	
TDC - Environment and Planning	31 Do you support the secondary part of the proposal for a potential new community near Tasman Village and Lower Moutere (Braeburn Road)? Please	Don't know	Only if the planning starts from the principles of -reducing climate vulnerability and building resilient infra structure -accelerating urban intensification -facilitating enormous decarbonisation of lifestyle and transport -facilitating affordable low emissions transport -facilitating affordable zero carbon housing -reducing inequality and inequity

	explain why.		
TDC - Environment and Planning	32 Do you agree with the locations shown for business growth (both commercial and light industrial)? Please explain why.	Neutral	<ul style="list-style-type: none"> <li>-reducing climate vulnerability and building resilient infra structure</li> <li>-accelerating urban intensification</li> <li>-facilitating enormous decarbonisation of lifestyle and transport</li> <li>-facilitating affordable low emissions transport</li> <li>-facilitating affordable zero carbon housing</li> <li>-reducing inequality and inequity</li> </ul>
TDC - Environment and Planning	34 Do you agree with the proposed residential and business growth sites in Tākaka?	Neutral	
TDC - Environment and Planning	35 Do you agree with the proposed residential and business growth sites in Murchison?	Neutral	
TDC - Environment and Planning	36 Do you agree with the proposed residential and business growth sites in Collingwood?	Neutral	
TDC - Environment and Planning	37 Do you agree with the proposed residential and business growth sites in Tapawera?	Neutral	
TDC - Environment and Planning	38 Do you agree with the proposed residential and business growth sites in St Arnaud?	Neutral	
TDC - Environment and Planning	39 Let us know which sites you think are more appropriate for growth or not in each rural town. Any other comments on the growth needs for these towns?		<p>All planning for any site/building project HAS to start from the principles of</p> <ul style="list-style-type: none"> <li>-reducing climate vulnerability and building resilient infra structure</li> <li>-accelerating urban intensification</li> <li>-facilitating enormous decarbonisation of lifestyle and transport</li> <li>-facilitating affordable low emissions transport</li> <li>-facilitating affordable zero carbon housing</li> <li>-reducing inequality and inequity</li> </ul>
TDC -	40 Is there		The whole plan has to start from the principles

<p>Environment and Planning</p>	<p>anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?</p>		<p>of</p> <ul style="list-style-type: none"> <li>-reducing climate vulnerability and build resilient infra structure</li> <li>-accelerate urban intensification</li> <li>-facilitate enormous decarbonisation of lifestyle and transport</li> <li>-facilitating affordable low emissions transport</li> <li>-facilitating affordable zero carbon housing</li> <li>-reducing inequality and inequity</li> </ul> <p>We don't need more perpetuating low-density green fields developments that are a major contributor to an array of existing, well-documented problems (e.g. car-centric development; high emissions construction; diffuse pollution of waterways; loss of rural land; traffic congestion; loss of soil carbon; social dislocation; inefficient urban infrastructure)</p>
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