

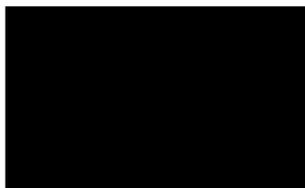


Ref: [REDACTED]

Civic House, 110 Trafalgar Street
PO Box 645, Nelson 7040, New Zealand

26 October 2021

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Dear [REDACTED]

**OFFICIAL INFORMATION REQUEST FOR MORE DETAILED INFORMATION ON THE
FUTURE DEVELOPMENT STRATEGY 2019**

I refer to your official information request dated 20 October 2021 for more detailed answers to the following questions:

- How did the Council experts assign the housing typologies?
- How did the assigned typologies contribute to a "well-functioning urban environment"?
- Whether the work triggered a 'qualifying matter' or s32 report?
- Can you please confirm that development of the FDS was in alignment with the guidance from the Ministry for the Environment on how to understand and implement the intensification provisions of an FDS?

You have received a response ([REDACTED]) on the question of how Council experts assigned the housing typologies of the FDS 2019 dated 12 October 2021. You have subsequently asked for more detailed information on this, plus asked several additional questions. These are set out below.

1) How did the Council experts assign the housing typologies?

The FDS 2019 responds to the need to plan for projected growth over thirty years. It is based on high-level growth trends while considering local land constraints and the opportunities of environments. In Nelson, the FDS 2019 has predicted the majority of future growth to be by the intensification of the existing urban area. The housing typologies that have been used in the 2019 FDS reflect this type of growth pattern, e.g., the placement of higher intensification (height and density) located in and around centres to reflect the higher land values of these areas and its proximity to jobs, local amenity and services.

Specifically, by way of an example, the FDS 2019 future intensification type for the Nelson City Centre was proposed to be of mixed-use type with some four to six-storey apartments. The proposed sequencing and timing of the estimated capacity of 676 dwellings in the City Centre

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was during decade two (2029-2038) of the FDS thirty-year timeframe. This reflects the expected density type and pattern for this area, appropriate for a high-level growth strategy of this nature.

2) How did the assigned typologies contribute to a “well-functioning urban environment”?

The term ‘well-functioning urban environment’ is referenced in the National Policy Statement on Urban Development Capacity 2016 as meaning:

This national policy statement provides direction to decision-makers under the Resource Management Act 1991 (RMA) on planning for urban environments. It recognises the national significance of well-functioning urban environments, with particular focus on ensuring that local authorities, through their planning, both:

- *enable urban environments to grow and change in response to the changing needs of the communities, and future generations; and*
- *provide enough space for their populations to happily live and work. This can be both through allowing development to go “up” by intensifying existing urban areas, and “out” by releasing land in greenfield areas.*

The assignment of housing typologies provided for an anticipated change in the Nelson urban environment, or Nelson Urban Area as it was known at that time, over the thirty-year lifespan of the Future Development Strategy. This included a transition to see more intensification of housing and housing types in the city especially in areas close to town centres, reflecting the need for more density within the existing urban footprint. Among the reasons for this are the current constraints of Nelson’s land due to its current ownership patterns, topography, potential climate impacts or the presence of natural hazards. Meanwhile, land at centres is typically more expensive than land at fringes and therefore, naturally supports the development of multi-storey apartments as a lower type of density becomes increasingly less economic and practicable.

3) Whether the work triggered a ‘qualifying matter’ or s32 report?

For clarity, s.32 reports are a requirement of the Resource Management Act for plan changes, not for a Future Development Strategy. Qualifying Matters were introduced in 2020, as part of the National Policy Statement on Urban Development 2020. The FDS 2019, to which you refer, was developed under the earlier National Policy Statement on Urban Development Capacity 2016, which did not require their consideration.

4) In addition, can you please confirm that development of the FDS was in alignment with the guidance from the Ministry for the Environment on how to understand and implement the intensification provision of an FDS?

The guidance to which you refer “Understanding and implementing intensification provisions for the National Policy Statement on Urban Development” has been published in support of the provisions of the National Policy Statement on Urban Development 2020. As discussed above, the FDS 2019 was developed under its predecessor, the National Policy Statement on Urban Development Capacity 2016.

You have the right to seek an investigation and review by the Ombudsman of this response. Information about how to make a complaint is available at www.ombudsman.parliament.nz or Freephone 0800 802 602.

If you wish to discuss this decision with us, please feel free to contact Clare Barton on 03 546 0343 or at clare.barton@ncc.govt.nz.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Clare Barton', with a stylized flourish at the end.

Clare Barton
Group Manager Environmental Management