BEFORE THE INDEPENDENT HEARING PANEL
APPOINTED BY THE TASMAN DISTRICT COUNCIL

IN THE MATTER	of the Resource Management Act 1991
AND	
IN THE MATTER	of the First Schedule to the Act
AND	
IN THE MATTER	of Proposed Change 1 to the Tasman Regional Policy Statement and Proposed Plan Change 81 to the Tasman Resource Management Plan

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EVIDENCE IN CHIEF OF JACQUI DAWN DEANS FOR TASMAN DISTRICT COUNCIL

HEARING STAGE 2

12 October 2026

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QUALIFICATIONS, ROLE AND EXPERIENCE

1. My full name is Jacqueline Dawn Deans.

2. I am Urban Growth Co-ordinator at Tasman District Council (**TDC** or **Council**). I have held this role since 2018, having worked since 2013 at the Council as an Environmental Policy Planner. I have been a planner for over 30 years in the public and private sectors, almost exclusively involved in urban planning.

3. As Urban Growth Co-ordinator my responsibilities include to co-ordinate and provide intellectual leadership of the Council's response to urban growth challenges and those of the wider Nelson/Tasman region. I am responsible for the preparation of Council's Housing and Business Assessments and annual monitoring reports and for providing growth advice to Council's Long term Plan team.

4. I hold a Bachelor of Arts in Urban Studies from Sheffield Hallam University in the UK and a postgraduate Master of Philosophy in Town Planning from University College London. I am a member of the Resource Management Law Association.

5. I led the Nelson Tasman Future Development Strategy 2022-2052 (FDS) which both Change 1 to the Tasman Regional Policy Statement (C1) and Plan Change 81 to the Tasman Resource Management Plan (PC81) have had regard to. I took part in community engagement and consultation on the plan changes, as well as discussions with ngā iwi and certain stakeholders.

INVOLVEMENT IN C1 AND PC81

6. I have been involved with **C1** and **PC81** since their inception. I assisted with the drafting of both section 32 evaluation reports and have read and considered submissions relating to growth issues on both plan changes.

7. I have read:
   (a) the relevant parts of the s 32 evaluation prepared for C1
   (b) the evidence of Ms McLean
   (c) the relevant parts of the s 42A report for Hearing Stage 2.

EXPERT WITNESS CODE OF CONDUCT

8. I have read the Code of Conduct for Expert Witnesses set out in the Environment Court Practice Note 2023 and agree to comply with it. My evidence has been prepared in accordance with the Code of Conduct.

9. I declare I am an employee of TDC. I confirm that the opinions I express in this evidence are within my expertise and represent my true and complete professional opinions. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express. The evidence I am giving is within my area of expertise, except where I state that I am relying on the opinion or evidence of others. I understand it is my duty to assist the Independent Hearing Panel impartially on relevant matters within my area of expertise.

GLOSSARY

10. Appendix 1 to my evidence provides a glossary of key terms relied upon in my evidence.

SCOPE OF EVIDENCE

11. I have been asked to give evidence on behalf of the Council concerning housing and business growth projections for C1 and PC81. This is due in part to submissions which have been received on C1 questioning the urban environment definition for Tasman, the validity of the 2024 “housing bottom lines” and growth assumptions and the housing land capacity definition.

12. I am giving my evidence in Hearing Stage 2, “Change 1 to the RPS”. My evidence addresses the “sufficiency” of housing and business development capacity in the Tasman District. This means that my evidence will also be relevant to later, PC81, hearing stages, Hearing Stage 3, 4 and 5.

13. My evidence addresses the following matters:

    (a) I begin by explaining the relationship between the FDS, Council’s growth model, the Housing and Business Assessment, and the Long Term Plan (**LTP**)

    (b) My evidence then moves to the 2024 Tasman Housing and Business Assessment (**HBA**)**,** including its findings on demand, development

capacity, sensitivity analysis, and housing typology. This information is important to help understand the impacts of changes elected members have signalled to TDC's approach to growth in the next 2027 LTP, which is relevant to providing the Panel with the most up to date information

(c) I then move to discuss those changes and explain the draft 2026 Tasman housing and business capacity analysis findings prepared to inform the 2027 LTP, including the assumptions, likelihood, and any uncertainty associated with that analysis

(d) the impact on the relationship between the draft 2026 capacity analysis and current infrastructure timing is addressed next

(e) before addressing submissions on C1, I briefly address the relevant findings of the joint Nelson Tasman 2024 HBA and Nelson City Council's available subsequent analysis and other relevant monitoring that provides recent evidence on housing and business markets and

(f) finally, I respond to submissions on C1.

14. The overall intent of this evidence is to provide the Panel with the most up to date housing and business data available and to explain and set out changes to TDC's planning approach that are happening in advance of next year's adoption of the LTP.

15. I also identify what is within my expertise and what is not. I am not a demographer. Where my evidence relies on analysis carried out by colleagues at the Council, including work undertaken for the 2024 HBA and the draft 2026 housing and business capacity analysis, I identify that work and the principal contributors, namely Brylee Wayman and Geoff Everitt. In addition, while not the primary focus of this evidence, I am a qualified planner and in places I comment on matters relating to that part of my expertise.

RELATIONSHIP BETWEEN FDS, COUNCIL'S GROWTH MODEL, HBA AND LTP

16. TDC shares a Tier 2 urban environment with Nelson City Council (**NCC**). As such, obligations that relate to Tier 2 Local Authorities in the National Policy

Statement on Urban Development (**NPS UD**) apply to the urban environment part of TDC. Such obligations include preparation of an FDS and an HBA. In growth planning there is a cyclical relationship between an FDS, the review of Council's growth model, an HBA and Council's LTP. Appendix 2 contains a diagram that illustrates this.

17. Tasman's urban environment comprises Richmond, Motueka, Wakefield, Brightwater and Māpua and this was resolved by the Joint Committee of Nelson City and Tasman District Councils on 10 November 2020. The same committee resolved that Nelson's urban environment comprises Nelson, Cable Bay and Hira. Together these areas form the Tier 2 Nelson Tasman shared urban environment. This resolution occurred just before work commenced on the FDS 2022-2052, as part of implementing the NPS UD 2020's new requirements. A map of the shared urban environment is provided in appendix 3.

18. The FDS 2022-2052 provides a regional spatial strategy for growth of Nelson and Tasman for the next 30 years. Guided by 11 objectives, the FDS provides for 25,000 homes and 89 hectares of business land. The spatial pattern of growth can be summarised as, consolidated growth focused largely along State Highway 6 while providing growth options for Māpua and Motueka and Tasman's rural towns.

19. For Nelson and Tasman as a whole, the FDS anticipates 47% of growth via intensification, 29% via managed greenfield expansion, 2% via rural residential and 22% via zoned but undeveloped capacity in existing greenfield areas.

20. The FDS adopted by the two councils includes the majority of the PC81 sites in their original form. The framework for urban development and growth management in Tasman in C1 is aligned with the FDS' spatial strategy and its objectives.

21. Most of the objectives and policies in the NPS UD apply to Local Authorities' urban environments. Tasman's urban environment comprised just over half of Tasman's population in 2024. The NPS UD requires evidence-based decision-making (clause 3.9) and as such prescribes quarterly monitoring for Tier 2 local authorities, annual publication of such monitoring and the

preparation of an HBA every three years. Clause 3.11 of the NPS UD requires local authorities to use evidence, particularly HBAs and quarterly monitoring when making or changing plans (such as C1 or PC81).

22. TDC has its own growth model that forecasts land requirements for housing and business land. The model has existed since 2004 and is currently on its eighth iteration. The model has been continuously improved and peer reviewed externally on four occasions. Every three years officers update the growth model with the latest population and household size projections and business land demand projections to predict future residential and business demand across Tasman for the next 30 years.

23. Each of the 15 towns assessed in the model are broken down into small 'Development Areas', like pieces of a jigsaw, for evaluation. The growth model outputs inform the LTP (financial decisions and infrastructure requirements), TRPS and TRMP.

24. Base data is initially updated for the review of the growth model and then three key stages follow:

    (a) Round 1 – a qualitative analysis of each 'Development Area' of each town to assess the developability of the area e.g. hazard risk, impact on freshwater, infrastructure availability

    (b) Round 2 – an assessment of the potential yield of each 'Development Area' for housing or business use. GIS base information helps this assessment together with input assumptions about likely density, typical lot size, terrain and developability

    (c) Round 3 – combines all the information from rounds 1 and 2 and provides an assessment of both the demand and the total likely housing and business development capacity available over time. Officers then input the realistically expected to be realized capacity by time period i.e. years 1-3, 4-10 and 11-30.

25. Approximately 20 officers from the Council are involved in each iteration of the growth model, comprising staff from GIS, IT, Environmental Policy Planning, Strategic Policy, Hazards, Infrastructure Activity Management Planning, Consents and Development Engineers.

2024 TASMAN HBA

26. Clause 3.19 of the NPS UD requires an HBA to be prepared for the urban environment every three years, in time to inform the next LTP. Clause 3.19 (2) clarifies that the HBA must apply, at a minimum to the Tier 2 urban environment but may apply to any wider area. Tasman's HBAs apply to the whole region. The HBA provides information on the demand and supply of housing and business land and the impact of planning and infrastructure decisions on the local authority's demand and supply. In doing so, the HBA informs RMA planning documents, FDSs and LTPs. The HBA must quantify the development capacity that is sufficient to meet expected demand over the 30 years, otherwise known as the "housing bottom lines."

27. The Council prepares a Tasman-only HBA (District wide) and a joint Nelson Tasman HBA (shared urban environment only) every three years. In preparation for the 2024 HBA, population projections were procured from Dot Consulting for both Tasman and Nelson in early 2023. Low, medium and high projection scenarios were obtained, based on different long term demographic trends for fertility rates, life expectancy and observed migration trends (between 2001-2018). The biggest difference between the population scenarios was driven by the different migration assumptions. The projections were 2018 based in terms of population.

28. Population growth rates in Tasman in 2021 and 2022 were similar to those projected in Dot Consulting's medium growth scenario. Under the Dot Consulting medium scenario, Tasman's population was projected to increase by 7,000 between 2024-2034, with an increase of 4,500 dwellings. This annual average of 450 new dwellings per year was similar to the average of 400 new dwellings consented in Tasman in the past decade (as at 2024). Council's Executive Leadership Team approved use of the medium growth population projection in March 2023. This projection was close to the Stats NZ high growth population projection for Tasman at that time.

29. Full Council adopted the growth assumptions in March 2024 for consultation and finally in June 2024, as part of the HBA and LTP itself. NCC also chose to use a medium growth projection from Dot Consulting for its LTP 2024-2034.

30. Also, for the 2024 HBA, business land demand projections were obtained from Sense Partners for retail, commercial and industrial land. Sense Partners' underlying 2021 forecasting model was updated. The projections were fed into Council's growth model by my colleague Brylee Wayman and the model was run in 2023 to provide an assessment of both the demand and the total development housing and business land capacity over time. The 2023 iteration of Council's growth model informed the LTP 2024-2034. In doing so it identified the timeframe that the various adopted FDS housing and business sites may be required to help meet demand. Those sites that, according to the model, were needed within the next 10 years (2024-2034) and that were not already zoned/proposed for zoning in another plan change, were recommended for inclusion in PC81. There then followed a site prioritisation exercise for the scope of PC81 in mid-2023 and further changes were made.

31. In 2023 when Council's growth model was reviewed, PC81 was expected to be notified by mid-2024, or end of 2024 at the latest. On this basis most PC81 sites were included as plan-enabled capacity from the medium term onwards (as per clause 3.4 of the NPS UD), according to infrastructure availability (infrastructure-ready capacity), known landowner and developer intentions (feasible and reasonably expected to be realised capacity), and suitability (business land).

32. The 2024 HBA was prepared during a time of uncertainty in relation to three waters' servicing. The Council was transitioning to a Water Services Entity at that time under the Labour Government and had no certainty over what servicing would be provided, but officers sought servicing provision for the relevant PC81 sites from the then National Transition Unit.

33. My colleague Brylee Wayman collated the growth model's results and together we prepared the 2024 HBA. The Council's 2024 HBA identified insufficient housing land capacity in Tasman's urban environment towards the end of the medium term (years 4-10), amounting to 365 dwellings of all types in its urban environment. Surpluses existed in the short and long terms. This shortfall in the medium term was not evenly spread – shortfalls existed in Motueka, Brightwater and Wakefield with surpluses in Richmond and Māpua. The shortfalls were largely due to insufficient timely

infrastructure, namely the Waimea Plains Water and Wastewater Plan, not due for completion until year 10. However, in Motueka the shortfalls existed for a range of reasons – low lying land, natural hazard constraints and highly productive land, as well as infrastructure requirements.

34. Nelson and Tasman Councils undertook an income constrained housing preferences survey, *"Housing We'd Choose"* in 2021 to inform housing demand by typology. Appendix 4 provides the results on the choice of dwelling type. The proportions of Tasman urban residents that preferred standalone, attached dwellings or apartments were applied to the overall future dwelling demand by location. Tasman's 2024 HBA found capacity shortfalls existed for attached dwellings across every time period in Tasman's urban environment, in every town except Richmond, amounting to a deficit of 735 attached dwellings over the 30 years. At the town level, the only town projected to have any surplus of attached dwellings was Richmond in the medium and long terms.

35. For business land, there was sufficient capacity for industrial and retail/commercial land in the Tasman urban environment across all time periods.

36. Tasman's rural environment is not subject to the same NPS UD obligations on capacity but there are sites in rural Tasman in PC81. For Tasman's rural environment i.e. the remainder of the District outside of the 5 towns in the urban environment, comprising Collingwood, Kaiteriteri, Marahau, Moutere, Murchison, Pohāra, Ligar, Tata, Riwaka, St Arnaud, Tākaka, Tapawera and the rural ward remainder, the residential capacity picture was as follows:

    (a) the Moutere area (largely Rural 3 zone) had sufficient capacity in the short and medium terms but insufficient capacity in the long term

    (b) The Golden Bay ward (Tākaka, Collingwood, Pōhara, Ligar, Tata) overall had sufficient capacity but individually, Tākaka had a shortfall in the short and medium terms due to insufficient infrastructure capacity.

    (c) The Lakes-Murchison ward (Tapawera, St Arnaud and Murchison) overall had sufficient capacity but individually, Murchison had a

small shortfall in the short term due to insufficient infrastructure capacity.

(d) Development capacity in the Rural 1 and 2 zones in Moutere and Ward Remainder areas across Tasman (including Riwaka, Kaiteriteri and Marahau) was likely sufficient to meet demand, although difficult to quantify.

37. Tasman's rural environment business capacity picture was, sufficient business land capacity for retail, commercial and industrial in Golden Bay and Lakes Murchison wards overall. The capacity picture for smaller rural settlements was deemed too difficult to quantify. The HBA noted, given the greater uncertainty in assessing business land demand and capacity in smaller towns and rural areas, it is important for Council to keep up to date with anecdotal evidence of shortages of sites for particular types of businesses.

38. Policy 2 of the NPS UD requires Tier 2 local authorities, at all times to provide *"at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term and long term."*

39. When there is insufficient development capacity in the urban environment, the local authority must immediately notify the Minister for the Environment (clause 3.7 NPS UD). As set out in the evidence of Ms McLean, after writing to the Minister in July 2024 advising of the same, the Hon Chris Bishop identified critical actions to address the shortfall, including: *"Work on a large plan change to rezone land in nine urban areas to implement the 2022-2052 Future Development Strategy."*

MINISTER'S STATEMENT OF EXPECTATIONS FOR C1 and PC81

40. TDC wrote to Minister Bishop on 10 November 2025 in response to an RFI on PC81 and C1, clarifying its residential and business land capacity picture from the HBA 2024, identifying the shortfall of housing land capacity in the medium term.

41. TDC wrote again to Minister Bishop on 13 February 2026 in response to him seeking Council's views on the proposed Direction to Council to use a

Streamlined Planning Process. We requested amending point (i) of the draft Direction to clarify that PC81 will significantly address but may not fully provide for Tasman's growth capacity needs.

42. This was not accepted and when the final Statement of Expectations was issued on 9 April 2026, number (i) of the Proposed Statement of Expectations remains:

> The expectations of the Minister responsible for RMA reform are that the proposed Ian Change 81 (PC81) to the Tasman Resource Management Plan and Change 1 (C1) to the Tasman Regional Policy Statement: (i) enable sufficient opportunities for the development of housing, businesses and related social and physical infrastructure in the short and medium term to ensure a well-functioning urban environment – in particular to meet Tasman District Council's share of the typologies identified as having a capacity shortfall in the Housing and Business Assessment Tasman and Nelson Tier 2 Urban Environment 2024.

43. As explained in paragraph 30 above, Council's growth model was run in early 2023 to inform the LTP 2024-2034 and C1 and PC81. When the adopted FDS' housing and business sites were factored into the model as potential capacity, the yield of dwellings or business land that those sites could provide was largely based on the FDS' estimations and calculations from 2022. As clause 3.13 of the NPS UD requires, FDSs spatially identify the "*'broad locations"'* in which development capacity will be provided.

44. Between 2023 and notification of PC81, boundaries of some FDS sites have been amended (due to e.g. further information being available on constraints), or the proposed housing density may have changed or the use has changed e.g. from residential to business. Following engagement on PC81 further changes were made to some sites but only two FDS sites that were originally included (in Murchison and Tākaka) have been removed from PC81. Some new sites have also been included in PC81. All these factors may lead to a change in yield of individual sites.

45. For information purposes, I have compared the yields assumed for PC81 in 2023 with the yields assumed today for PC81. As expected, there are differences.

46. It is not possible to retrospectively update an HBA in this way, with one parameter (yields). The glossary to my evidence (appendix 1) explains plan-enabled development capacity, infrastructure-ready development capacity, feasible and reasonably expected to be realised capacity and suitable capacity for each business sector. These definitions are all provided by the NPS UD (clause 3.4, 3.26, 3.29) to measure sufficient development capacity. These requirements for estimating sufficient capacity comprise time bound assumptions and therefore cannot reflect changing circumstances.

47. However as mentioned above I have compared the assumed yields for the PC81 sites in the 2024 HBA with the known yields of the same sites today. This comparison makes no attempt to consider infrastructure readiness, suitable or feasible and reasonably expected to be realised capacity.

48. Appendix 6 provides this comparison and shows that the yields of the residential PC81 sites have increased from approximately 3,713 dwellings in the 2024 HBA to just over 4,100 dwellings today. A gain of approximately 410 dwellings overall. 85% of this net gain is attributed to a very large papakāinga site in Motueka Valley (T-17b) which has a much higher potential yield today than was assumed for rural residential development of the site in 2024.

PREPARATION OF 2026 HOUSING AND BUSINESS CAPACITY ANALYSIS FOR THE 2027 LONG TERM PLAN

49. In practical terms, the 2024 HBA is now out of date. Normally officers would now be working on the 2027 HBA to accompany the Council's LTP 2027-2037. However, as noted by Ms McLean, this obligation has been suspended by the Planning Act 2026. The Council's 2024 HBA is therefore likely to remain the most recent HBA for some time.

50. However, TDC like other councils, continues to prepare LTPs every three years and in order to inform those plans the Council still needs to understand latest housing and business land demand and available capacity. The current draft 2026 capacity analysis is described below as it provides relevant supplementary information to the 2024 HBA, for

assessing the sensitivity of the capacity conclusions based on different demand assumptions.

51. In preparation for the LTP 2027-2037, population, household size and dwelling demand projections were procured from Infometrics by TDC in October 2025, focussing on the period 2027-2057. (NCC also later procured similar projections from the same consultant.) A very high, high, medium and low projection was procured. These projections were based on the 2023 Stats NZ census population projections with 2018 Census based sub-district population and household projections, the latest available information at that time. The projections were broken down into Statistical Area 2 level.

52. On 19 March 2026 at the Strategy Finance and Performance Committee, Council selected Infometric's medium growth projection for the LTP 2027-2037. This was contrary to officer advice, which recommended the high growth projection.

53. Business land demand projections were procured from Insight Economics towards the end of 2025/early 2026 for both Tasman and Nelson. Infometric's population projections and household size projections and Insight Economics' business land demand projections were fed into Council's growth model earlier this year by my colleague Geoff Everitt, to derive dwelling demand projections and the model was run in the usual way during the first half of 2026, as described in paragraphs 23-24 above.

54. As explained above a full HBA will not be prepared for the LTP 2027-2037. Instead, a document will be prepared which will form an appendix to the LTP explaining the results of the housing and business capacity analysis undertaken for the LTP.

55. My colleague Geoff Everitt collated the results of the growth model review and results of this 2026 capacity analysis are already available, comprising a third draft version. Council has not made any decisions yet on the LTP 2027-2037. However, the 2026 **demand** projections for housing and business will not change between now and adoption of the LTP 2027-2037; they are settled. It is the infrastructure ready, suitable, feasible and realistically expected to be realised capacity of residential and business land

over time that may change following any further Council guidance and decisions on capital expenditure for infrastructure. Below is the timeline for finalisation of this capacity analysis:

(a) An initial draft of the housing and business capacity analysis was presented to the Council on July 8 2026 during an LTP workshop on growth

(b) Subsequent Council LTP workshops on capital expenditure prioritisation took place on 25 August and in September 2026 and revised housing and business capacity implications were presented at the August workshop, with a potential shortfall in capacity for Māpua (and the urban environment as a whole) highlighted

(c) A Council workshop is planned for 21 October 2026 when strategic priorities for Activity Management Plans will be covered, as well as a presentation of the financial model second run

(d) Further Council workshops are planned for 22, 28 October 2026 and 4 November on the capital expenditure programme. The 28 October workshop will be growth focussed

(e) Full Council meeting to be held on 25 November 2026 to sign off the LTP budget for consultation and audit purposes

(f) Public consultation early 2027

(g) Adoption of LTP in June 2027

56. As the timeline above shows, the 2026 capacity analysis remains draft at this stage and may be further updated as C1 and PC81 go through the hearing process. The next section of my evidence presents the current findings of the 2026 capacity analysis.

RESULTS OF DRAFT 2026 HOUSING AND BUSINESS CAPACITY ANALYSIS AND COMPARISON WITH 2024 HBA

57. Infometrics' medium growth population projection used in the 2026 analysis can be compared with the 2024 Dot Consulting medium growth population projection by comparing projections for the same time period. Looking at the period 2028-2058 the Dot medium projection forecasts an additional 16,455 people in Tasman, whereas the Infometrics medium projection forecasts an

additional 10,628 people in Tasman – about 5,800 people less. That said, for forecasting development capacity, it is the additional dwellings and business land that are significant.

58. Appendix 5 provides a comparison of the 2024 Tasman HBA **demand** for dwellings and business land over the 30 years with the draft 2026 Tasman **demand** analysis. Demand figures are provided with and without the competitiveness margin for the urban environment.

59. This shows that dwelling **demand** for Tasman district as a whole (including the competitiveness margin for the urban environment) has reduced from the 2024 HBA to the 2026 capacity analysis, by approximately 1,174 dwellings from 4,673 to 3,499 dwellings over the short and medium terms (10 years). Over the short, medium and long term (30 years) the reduction is 5,312 dwellings.

60. For the urban environment only, the **demand** difference between 2024 and 2026 data is approximately 654 dwellings in the short and medium terms declining from 2,973 dwellings to 2,319 dwellings. Over the short, medium and long term the reduction is 2,814 dwellings.

61. For the rural environment only, the **demand** difference in the short and medium term is approximately 520 dwellings and 2,498 dwellings in the short, medium and long term.

62. Appendix 5 also shows the difference in business land **demand** between the two analyses and business land comprises all retail, commercial and industrial land. The difference between 2024 and 2026 in these is not as straight forward. In the urban environment only, the 2024 HBA required 23.1 hectares of business land over the short, medium and long term, whereas the 2026 capacity analysis requires just over 51 hectares of business land. This includes the competitiveness margin. When the rural environment is also added, this amounts to 35.5 hectares in 2024 compared with and 66 hectares in 2026 over the short, medium and long term for the whole of Tasman.

63. The increase in business demand in the 2026 analysis was expected. The 2024 HBA notes at page 79 that *"the business land demand forecasts in*

this HBA are significantly different from the last HBA and are generally lower for Tasman." Different models procured from different consultants were relied upon in 2021 than 2024. Due to the projections being much lower, section 6.6.2 of the 2024 Tasman HBA examined alternative projections based on past business building consents and found that on that basis 75ha of business land would be required in Tasman's urban environment, more than triple that projected.

64. The third draft of the 2026 capacity analysis for the LTP 2027-2037 also provides an updated "sufficiency" **capacity** picture. In conjunction with the latest capital expenditure prioritisation programme (yet to be further workshopped with Council, for Council to understand the implications) the outcome of the analysis can be summarised as:

(a) Insufficient residential **capacity** in the medium term (years 4-10) in the urban environment amounting to a shortfall of 410 dwellings. There are shortfalls in every town in the urban environment, but they are highest in Motueka and Richmond.

(b) Sufficient residential **capacity** in the urban environment in the short (years 1-3) and long term (years 11-30), amounting to a cumulative surplus of 1,788 dwellings by year 30 (i.e. taking into account the shortfall in years 4-10). There are surpluses in every town in the urban environment, except Motueka.

(c) Tasman's rural environment is not subject to the same NPS UD obligations on capacity but there are sites in rural Tasman in PC81. The draft analysis shows a sufficiency of **capacity** over the whole 30 year period at this stage (2027-2057), with a surplus of 626 dwellings in total. This is for all rural towns: Collingwood, Kaiteriteri, Marahau, Moutere, Murchison, Pohāra, Ligar, Tata, Riwaka, St Arnaud, Tākaka, Tapawera and the rural ward remainder. With the exception of Marahau and Riwaka which have small shortfalls, all towns have a surplus of residential capacity over this time period.

(d) This sufficiency analysis has used the latest yields for PC81 sites referenced in paragraph 55 above and provided in appendix 6. However, in this third draft of capacity analysis, a number of PC81 sites are affected by changes to the CAPEX prioritisation

programme (paragraph 65 below provides details). The details of the changes to the CAPEX prioritisation will be addressed by Mr. Goldingham in his Hearing Stage 3 evidence.

(e) The insufficiency of residential **capacity** for the urban environment as a whole in the medium term is therefore not helped by lack of infrastructure-ready capacity, worsened by the latest CAPEX prioritisation programme. This prioritisation may yet change again when the implications are workshopped with Council in October. Other insufficiencies arise in Motueka as it continues to suffer from a range of constraints – low lying land, natural hazard constraints and highly productive land, as well as infrastructure requirements. Richmond has traditionally been the workhorse of the urban environment but now also has insufficient capacity in the medium term, despite PC81 sites being included. Richmond is increasingly infrastructure limited.

(f) For business land **capacity,** combining retail, commercial and industrial together there is sufficient capacity in the urban environment overall in the short and medium term, with a surplus of 37 hectares existing. Some towns including Māpua, Motueka and Wakefield individually have shortfalls over the short or medium terms but Richmond provides the surplus required. In the long term again, sufficient capacity exists with a cumulative surplus of 57 hectares. (NB. this capacity analysis for business land takes no account of any demand for business land from NCC).

(g) In the rural environment, business **capacity** is difficult to quantify in the rural ward remainder areas against known demand. However there appears sufficient capacity of business land in the rural towns, except for the Moutere area, Riwaka, St Arnaud and Tapawera, where modest shortfalls exist.

65. The changes to the draft CAPEX prioritisation mean that infrastructure programmes for some PC81 sites are now beyond the 10-year timeframe of LTP 2027-2037 (as per paragraph 60(d) above). These sites include:

(a) Māpua – all PC81 sites (residential and one business).

(b) Wakefield – T-194a and T-194b, together with business site T-108.

(c) Brightwater - T-002 and T-103 – modest intensification capacity pushed out to 2037 onwards.

66. If the programming of the infrastructure projects was brought forward to the first 10 years of the LTP, that would more than alleviate the current insufficiency of residential capacity (-410 dwellings) for the urban environment overall in the medium term.

JOINT NELSON TASMAN 2024 HBA AND SUBSEQUENT ANALYSIS

67. As mentioned above, NCC and TDC share a joint Tier 2 urban environment and have prepared a joint HBA.

68. The Joint Nelson Tasman urban environment HBA 2024 found a shortage of land for approximately 600 dwellings in the medium term, (with Nelson also having a shortfall during that period), but surpluses for the short and long terms. The Joint HBA found shortfalls of attached dwellings across all time periods.

69. NCC's 2024 HBA shortfall was 243 dwellings in the medium term [1] This shortfall assumed the council's proposed Plan Change 29 would be implemented, but it was not; certainly not on the scale envisaged.

70. The Joint Nelson Tasman HBA also found Nelson had shortfalls of retail/commercial and industrial land in the medium and long terms but, as mentioned in Ms McLean's evidence, that Tasman's surpluses of business land made up for these shortfalls, with sufficient capacity in the urban environment overall. This sufficiency was provided that the business land demand projections for industrial land were not significantly inaccurate, as discussed in paragraph 63 above. If the alternative projection based on past building consents trends tested by Tasman was more accurate there would

[1] NCC's Nelson HBA contains an error in the number of dwellings short in the medium term. It states the shortfall is 133 dwellings. The author of that report confirmed with me in August 2025 that this is an error and the correct figure should be a shortfall of 243, as is stated in the Nelson Tasman Joint HBA.

in fact be no industrial land surplus to assist Nelson. A retail/commercial surplus would however still exist to assist Nelson.

71. NCC has not undertaken any formal capacity analysis in accordance with the NPS UD since its 2024 HBA. Consequently we do not have an up-to-date draft picture of the sufficiency of capacity in the shared Nelson Tasman urban environment. When NCC officers took a report to their Council on 2 October 2025 to make a part of its notified Plan Change 29 (PC29) operative, they observed: "*There is likely to be insufficient capacity to meet housing demand in the long term (i.e. until 2054) under PC29 in its current form. However government is currently reforming the resource management system and the requirements for sufficient future development capacity may change."*

72. PC29 remains subject to appeal and according to NCC officers, the outcome of that appeal may affect the final sufficiency of capacity for Nelson.

OTHER EVIDENCE AND MONITORING

73. As noted above in paragraph 21, the NPS UD requires evidence-based decision-making (clause 3.9) and clause 3.11 of the NPS UD requires local authorities to use evidence, particularly HBAs and quarterly monitoring when making or changing plans. In addition to the HBA, TDC has also produced annual monitoring reports jointly with NCC since 2017.

74. The most recent annual monitoring report covering the financial year 2025/26 is being finalised now and will shortly be provided to the councils, for information purposes. This draft report provides the following picture for the Tasman and its urban environment:

    (a) Applicants for social housing in Tasman on the Ministry of Social Development's (MSD) Register remain similar to last year at 144 and 89% of these are high priority.

    (b) 814 additional households in the shared Nelson Tasman urban environment need affordable housing but do not qualify for MSD's Register. This is despite the highest level of new affordable rental

and public housing being built in the region for over 25 years (mostly in Nelson).

(c) Tāhunanui Beach Holiday Park and Queen St Holiday Park in Richmond together now accommodate over 350 semi-permanent or long term residents and are at full capacity.

(d) Residential building consents in Tasman remain 45% below 2022 levels at 315 dwellings for 2025/26.

(e) Stand-alone houses continue to be the dominant housing typology consented in Tasman, with 77% of all new dwelling units 2025/26.

(f) New residential sections created (titles) in Tasman are relatively low in 2025/26 at 133, compared with approximately 370 in 2022/23/24.

(g) New residential lots granted subdivision resource consent are also low for 2025/26 at just 66 lots compared with over 200 in 2022/23 and 2024/25.

(h) Tasman remains the least affordable region in the country according to the Massey University Affordability Index.

75. The above data suggests strong demand for housing, particularly affordable housing, in Tasman but a declining capacity pipeline in the near future, particularly with relatively low numbers of building consents, new titles and resource consents. The data also shows that stand-alone houses continue to be the favoured typology being built by developers.

RESPONSES TO SUBMISSIONS

76. Below I address submissions on matters relating to this evidence. I have limited my responses to submissions on C1, noting that some of my responses will be equally applicable to submission points on PC81. I have also avoided responding point by point to the submissions, on the basis that the s 42A reporting officers will address in their report. Instead, I have addressed the themes or topics that arise.

77. Submissions opposing C1 that concern growth related matters comprise the following themes:

(a) The definition of the urban environment in relation to Tasman and objection to inclusion of certain towns in it, as well as requests for expansion of its geographical area.

(b) The housing "bottom lines" are out of date or opposed and should be reviewed using updated population and growth information including recognition of constraints such as natural hazards.

(c) Planning decisions should be based on robust and up-to-date information and C1 relies on information that is outdated.

(d) Clearer demonstration that policy 2 of the NPS UD will be met by the Nelson Tasman shared urban environment (providing at least sufficient capacity).

(e) Clarification over the meaning of housing land capacity.

(f) Recognition of the fact that private plan changes can be a mechanism for meeting growth needs.

(g) Recognition that Rural 3 and Rural Residential zoned land are anticipated residential areas, providing residential capacity, and that they are not overlooked.

(h) Cross boundary assessment of development capacity between Nelson City and Tasman District Councils, so that land is not excluded solely based on territorial boundaries.

78. My response to these (in the same order as above) is as follows.

79. **Urban environment** - The NPS UD defines an urban environment. The then Ministry for Environment clarified with the Council in 2020 that the definition means an urban environment can include non-contiguous areas of urban land, so long as they are part of the same housing and labour market. To determine this, officers examined census travel to work data to recommend whether an area is part of the same labour market. Tasman's urban environment comprises Richmond, Motueka, Wakefield, Brightwater and Māpua and was resolved by the Joint Committee of NCC and TDC on 10 November 2020. The same committee resolved that Nelson's urban environment comprises Nelson, Cable Bay and Hira.

80. **Housing "bottom lines" are out of date and should be reviewed** - The NPS UD policy 7 requires Tier 2 local authorities to set housing bottom lines for the short-medium and long-term in their regional policy statements and district plans. The purpose of the housing bottom lines is to state the amount of feasible, reasonably expected to be realised development capacity that is sufficient to meet expected housing demand (including the competitiveness margin). Clause 3.6 of the NPS UD requires that housing bottom lines are based on information in the most recently publicly available HBA.

81. My evidence has explained that the most recent HBA remains the 2024 HBA and that another HBA will not be prepared in the near future as the Planning Act 2026 exempts the Council from doing so. The draft 2026 capacity analysis provides relevant supplementary information but will not be used to update housing bottom lines. The housing bottom lines in C1 are not new, they already exist in the TRPS, they have moved position as part of C1 (from existing General Objective 2A to Objective 5.1A with a small amount of additional text but no change to the capacity numbers.)

82. In response to the submission point that housing bottom lines should recognise constraints such as natural hazards, they do. The bottom lines originate from the HBA which in turn has been informed by Council's growth model. During round 1 of each review of the growth model, constraints including natural hazards are assessed for each development area in each town. This then determines whether the area of land progresses for further consideration to rounds 2 and 3 of the growth model review and whether it may form part of Tasman's potential development capacity in the future.

83. **Planning decisions should be based on robust and up-to-date information and C1 relies on information that is outdated –** planning decisions are required by the NPS UD (clauses 3.9 and 3.11) to be based on robust and up-to-date information. Preparation of C1 and PC81 commenced by officers in May 2023, (with a formal resolution from the Strategy and Policy Committee of 16 November 2023). Concurrent to this, the 2024 HBA was being prepared. Council's 2024 Growth Model had been reviewed in early 2023 to inform the LTP 2024-2034 and it identified the timeframe that the various FDS housing and business sites were needed to

meet demand. Those that were needed within the next 10 yrs (2024-2034) and that were not already zoned/proposed for zoning in another plan change, were recommended for inclusion in PC81.

84. The progression of C1 and PC81 was then delayed due to preparation and adoption of the Richmond Spatial Plan (adopted June 2024) which sought to explore the proposed medium density residential zone further. The plan changes were then further delayed from being notified following the Government's "Plan-Stop" legislation (RMA (Consenting and Other System Changes) Amendment Act 2025. Consequently, by the time C1 and PC81 were notified (June 2026), work had already commenced on the review of Council's growth model to inform Council's next LTP 2027-2037. New population projections were procured in 2025. The draft results from this latest capacity analysis have been provided as part of my evidence.

85. The Council publishes annual monitoring reports on housing and business markets each year and the current one (25/26) is due to go to the Joint Committee of Nelson City and Tasman District Councils later this year.

86. **Clearer demonstration that policy 2 of the NPS UD will be met by the Nelson Tasman shared urban environment providing at least sufficient capacity** - my evidence has sought to illustrate the sufficiency of capacity picture from the 2024 HBA as well as the picture from the draft 2026 capacity analysis. Both analyses, at this stage, indicate a shortfall in residential capacity in the medium term. Policy 2 requires local authorities to provide at least sufficient development capacity to meet demand.

87. In terms of the picture for the shared urban environment, NCC's 2024 HBA also identified a shortfall in residential capacity in the medium term. NCC has not undertaken any formal capacity analysis in accordance with the NPS UD since its 2024 HBA. We do not therefore have an up-to-date picture of the sufficiency of capacity in the shared Nelson Tasman urban environment. Nelson officers took a report to its Council on 2 October 2025 and observed: "*There is likely to be insufficient capacity to meet housing demand in the long term (i.e. until 2054) under PC29 in its current form. However government is currently reforming the resource management system and the requirements for sufficient future development capacity may change."*

88. **Meaning of housing land capacity –** this submission theme includes that Rural 3 and Rural Residential zoned land should be counted as anticipated residential areas, providing residential capacity, and not overlooked. "Capacity" in the context of NPS UD includes zoned land not yet developed, or zoned land proposed to be intensified. Such capacity is anticipated for plan enabled capacity in an HBA. As the glossary to my evidence explains further there are different types of capacity.

89. **Recognition of the fact that private plan changes can be a mechanism for meeting growth needs -** The contribution private plan changes make to development capacity is usually unquantifiable when preparing an HBA, if the private plan change is not already accepted. They are often unanticipated. Policy 5.1B in C1 provides for such proposals.

90. **Cross boundary assessment of development capacity between Nelson City and Tasman District Councils excluding territorial boundaries** – this submission was raised in relation to C1 policy 5.1BA which is for unanticipated and out of sequence plan changes that add 'significantly' to development capacity. A joint HBA 2024 was prepared between Tasman and Nelson which assessed potential development capacity in both Local Authorities, to provide sufficient capacity overall in the urban environment. This was subsequent to the preparation of a joint FDS which assessed potential development sites using the same criteria and their scoring being moderated by a third party.

CONCLUSIONS

91. Tasman's 2024 HBA assumed most PC81 sites (or parts of) would form plan-enabled capacity from the medium term onwards. This was because at the time the growth model was run and the HBA prepared, it was reasonable to expect that PC81 would be notified in 2024. Parts of those PC81 sites also formed feasible realistically expected to be realised capacity from the medium term onwards.

92. Even with the PC81 sites included, the 2024 Tasman HBA identified a medium term urban environment housing shortfall of 365 dwellings and a significant shortage of 735 attached housing typologies across all time periods except for Richmond. In the Tasman rural environment sufficient

residential and business capacity existed in each ward overall but with individual residential shortages in some towns.

93. The Minister's expectations for PC81 and C1 emphasise providing sufficient housing and business opportunities in Tasman's urban environment, particularly for housing types already identified as having a shortfall. My evidence explains that these shortages existed in the 2024 HBA, despite most PC81 sites being included in that assessment.

94. Current estimates suggest that PC81 sites may yield around 400 more dwellings than was assumed in 2023/24. However, the 2024 HBA cannot be simply updated retrospectively with these yields because the HBA represents a point in time assessment under the NPS UD.

95. Council is not required to prepare an HBA for the LTP 2027-2037, but officers have undertaken a capacity analysis in 2026 to help inform the LTP's programme of works, which provides the most up to date information for the Panel. The 2026 analysis uses updated population and dwelling projections and business land demand forecasts. It provides relevant supplementary information to the 2024 HBA, for assessing the sensitivity of the capacity conclusions based on different demand assumptions. While this analysis remains draft, the 2026 demand projections will not change for this LTP. Only the infrastructure ready, feasible, suitable and realistically expected to be realised housing and business land capacity may change.

96. My evidence illustrates that although housing demand projections have reduced in Tasman since 2024 and PC81 residential yields are now expected to be higher in the draft 2026 capacity analysis, Tasman's urban environment still faces a medium term housing shortfall. This insufficiency amounts to approximately 410 dwellings in the medium term. While business land capacity is sufficient in the urban environment overall, individual towns including Motueka, Wakefield and Māpua would face business land shortages in the short or medium terms. This is primarily because key growth areas cannot be developed quickly enough without capital infrastructure investment being programmed earlier in the LTP 2027-2037. The prioritisation of such investment is still being workshopped with Council over the coming months, before the draft LTP is publicly consulted on and adopted in June 2027.

97. The data I have provided suggests strong demand for housing, particularly affordable housing, in Tasman but a declining capacity pipeline in the near future; particularly with relatively low numbers of building consents, new titles and resource consents. The data also shows that stand-alone houses continue to be the favoured typology being built by developers. Tasman remains the least affordable region in the country.

98. While Tasman shares an urban environment with Nelson, it also had a shortfall of housing in the medium term in its urban environment in the 2024 HBA and that assumed its proposed PC29 would proceed as notified. In fact, only a small part of PC29 has been made operative to date. Tasman cannot therefore currently rely on Nelson to make up its residential shortfall. Nelson City Council has not undertaken any formal capacity analysis since the 2024 HBA. However, officers noted in a report in October 2025 that *"there is likely to be insufficient capacity to meet housing demand in the long term (i.e. until 2054) under PC29 in its current form."*

Jacqui Deans

12 October 2026

APPENDICES

Appendix 1

Glossary

Capacity – (of housing and business land) is the number of houses (various typologies) or hectarage of business land needed to be provided to meet demand in different locations. The capacity is derived from modelling. There are different types of capacity estimated in a Housing and Business Assessment, please see below.

Competitiveness margin – a margin of development capacity over and above the expected demand that Council is required to provide, in order to support choice and competitiveness in housing and business land markets. The margin ranges between 15-20% over the 30 year period (20% for years 1-10 and 15% for years 11-30).

Demand – (for housing and business land) is based on a combination of population growth and household size, as well as some non-resident dwelling demand (such as holiday homes). It is the number of dwellings required over a given time period.

FDS – Nelson Tasman Future Development Strategy 2022-2052 adopted by the Councils in 2022

Feasible and reasonably expected to be realised (RER) capacity – an estimation of the development capacity that can reasonably be expected to be realised, using:

- an assessment of developability of potential growth areas of the District taking into account for example hazard risk, productive land value, terrain, topography etc.
- past building consent trends
- subdivision resource consent trends
- the commercial viability of a project to a developer based on the relationship between costs and revenue
- known landowner and developer interest and intentions
- known status of plan-enabled and infrastructure-ready development capacity.

RER capacity is a portion of plan-enabled, infrastructure-ready and commercially feasible land.

HBA - Housing and Business Assessment required by the NPS UD

Housing bottom lines – the amount of feasible, reasonably expected to be realised development capacity that is sufficient to meet expected housing demand (plus the competitiveness margin) in the Region and District for the short, medium and long term. This is required to be set in Council's Regional Policy Statement and District Plan by the NPS UD.

Infrastructure-ready development capacity – has the meaning from clause 3.4 of the NPS UD:

"Development capacity is infrastructure-ready if:

(a) in relation to the short term, there is adequate existing development infrastructure to support the development of the land

(e) in relation to the medium term, either paragraph (a) applies, or funding for adequate development infrastructure to support development of the land is identified in a long-term plan

(f) in relation to the long term, either paragraph (b) applies, or the development infrastructure to support the development capacity is identified in the local authority's infrastructure strategy (as required as part of its long-term plan)".

Long term- between 10 and 30 years

LTP - Council's Long Term Plan (also known as 10-Year Plan)

Medium term – between 3 and 10 years

NPS UD – National Policy Statement on Urban Development (May 2022)

PC81 – Plan Change 81 to Tasman's Resource Management Plan

Plan-enabled development capacity – has the meaning from clause 3.4 of the NPS UD:

"Development capacity is plan-enabled for housing or for business land if:

(b) in relation to the short term, it is on land that is zoned for housing or for business

use (as applicable) in an operative district plan

(c) in relation to the medium term, either paragraph (a) applies, or it is on land that is

zoned for housing or for business use (as applicable) in a proposed district plan

(d) in relation to the long term, either paragraph (b) applies, or it is on land identified

by the local authority for future urban use or urban intensification in an FDS or,

if the local authority is not required to have an FDS, any other relevant plan

or strategy".

Short term – within the next 3 years

Sufficient development capacity- sufficient capacity to meet expected demand for housing and business development. Such development capacity must be plan-enabled, infrastructure-ready and feasible, RER and include the competitiveness margin. For business capacity it must be plan-enabled, infrastructure-ready and suitable for each business sector.

Suitable capacity for each business sector – a local authority may define what it means for development capacity to be suitable in any way it chooses but suitability must, at a minimum include suitability in terms of location and site size.

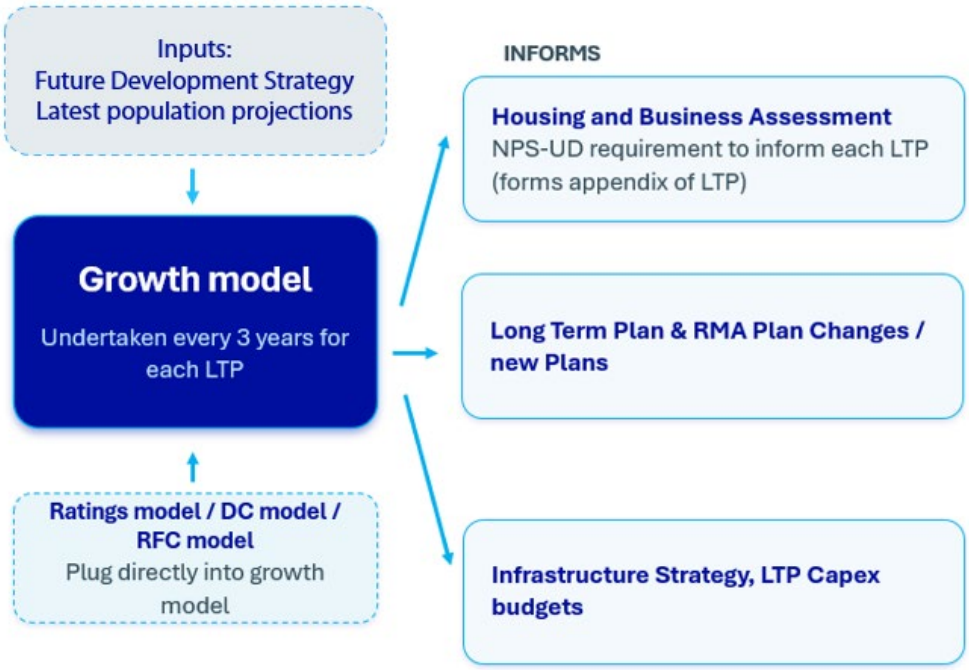
TRPS C1 - Change 1 to Tasman's Regional Policy Statement

Tier 2 urban environment – means the shared Tier 2 urban environment between Tasman District and Nelson City Councils as listed in the appendix of the NPS UD.

Yield – the estimate of the number of dwellings or hectares of business land to realistically be provided by any one site

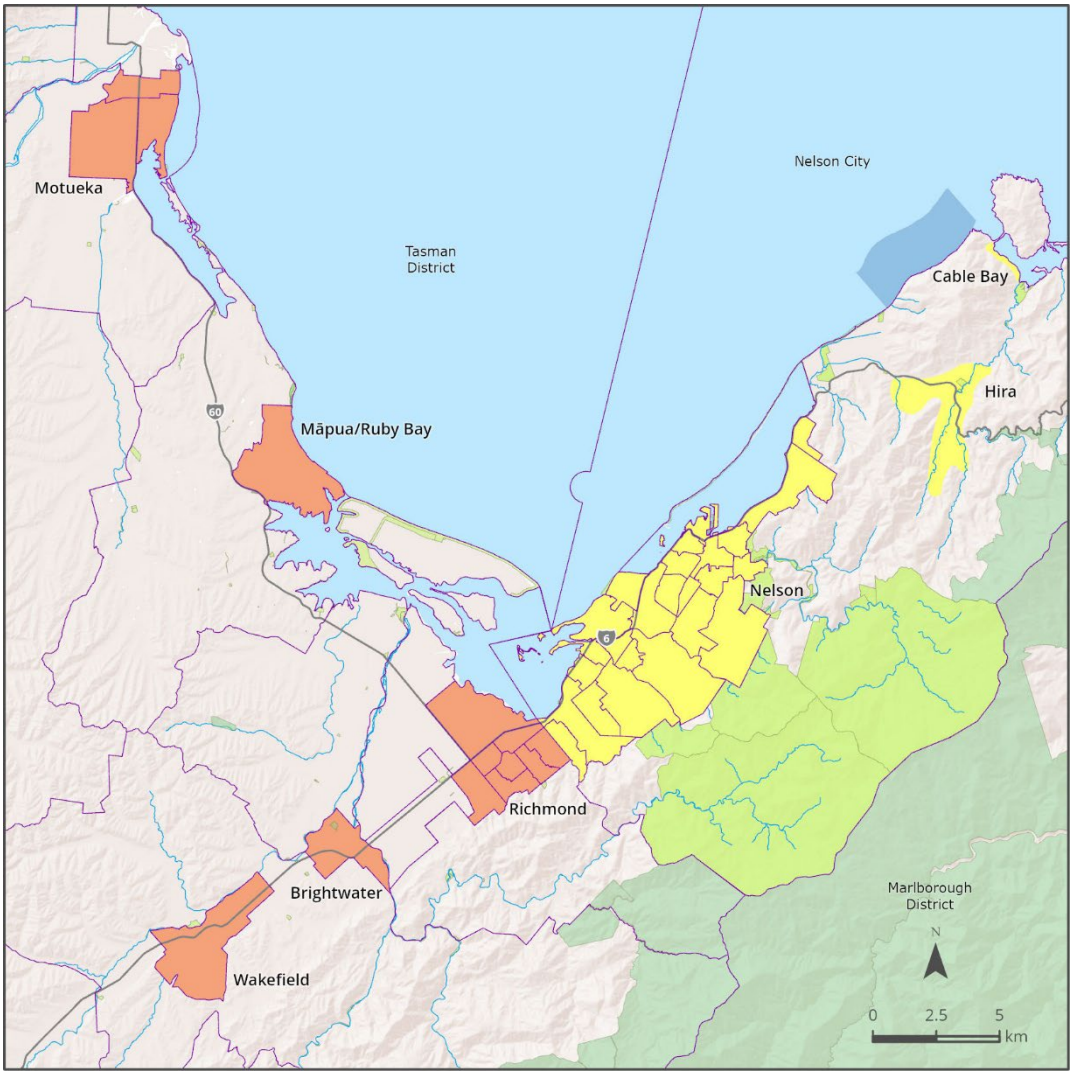
Appendix 2

Relationship between the FDS, HBA, Council's growth model and LTP



Appendix 3

Nelson Tasman shared Tier 2 urban environment



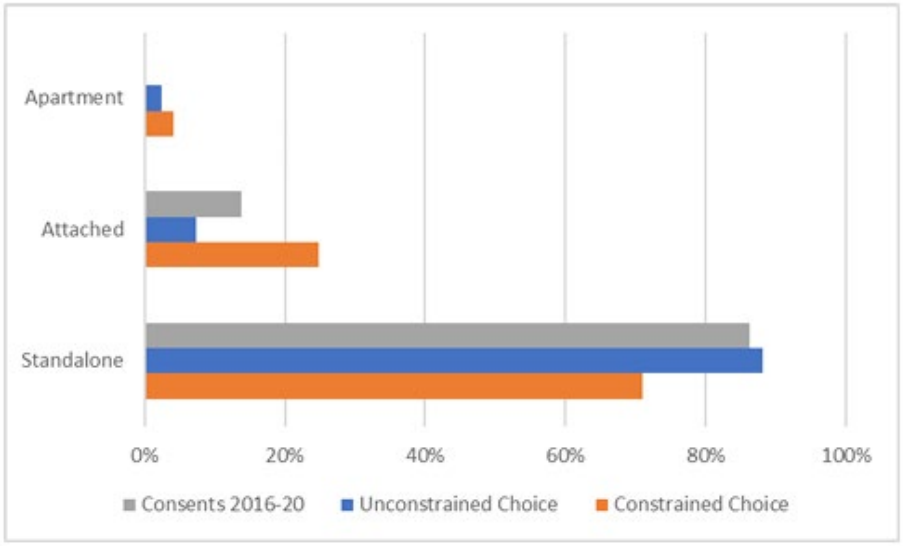
The orange and yellow shaded areas show the shared Nelson Tasman urban environment

Appendix 4

“Housing We’d Choose” (Housing Preferences Survey) 2021

Dwelling type choice results

Figure 4.16: Dwelling Type - Current vs Choice Experiment – Tasman Urban



Appendix 5

Comparison of 2024 Tasman HBA demand for dwellings and business land with 2026 Tasman demand projections

The tables below compare:

(i) the number of dwellings required over the 30 year period in the 2024 HBA with the same 2026 demand analysis for the LTP 2027-2037

(ii) the amount of business land required over the 30 year period in the 2024 HBA with the same 2026 demand analysis for the LTP 2027-2037. Business land includes retail, commercial and industrial (light and heavy). To simplify the table these business land types have been merged.

Growth Model area	2024 HBA demand for new dwellings	2024 HBA demand for new dwellings with competitiveness margin (20%)	2024 HBA demand for new dwellings	2024 HBA demand for new dwellings with competitiveness margin (15%)	2026 analysis demand for new dwellings	2026 analysis demand for new dwellings with competitiveness margin (20%)	2026 analysis demand for new dwellings	2026 analysis demand for new dwellings with competitiveness margin (15%)
	Years 1-10 (2024-2034)	Years 1-10 (2024-2034)	Years 11-30 (2034-2054)	Years 11-30 (2034-2054)	Years 1-10 (2027-2037)	Years 1-10 (2027-2037)	Years 11-30 (2037-2057)	Years 11-30 (2037-2057)
Richmond	1,152	1,382	2,156	2,480	1,011	1,213	1,652	1,900
Brightwater	242	290	592	681	128	153	107	123
Māpua/Ruby Bay	192	230	352	404	178	214	99	114
Motueka	644	773	1,093	1,257	449	539	851	979
Wakefield	248	298	573	659	167	200	178	205
Subtotal of urban environment	**2,478**	**2,973**	**4,766**	**5,481**	**1,933**	**2,319**	**2,887**	**3,321**
Moutere	610	n/a	1,290	n/a	393	n/a	268	n/a
Tākaka	360	n/a	300	n/a	71	n/a	101	n/a
Collingwood		n/a		n/a	9	n/a	0	n/a
Pōhara/Ligar/Tata		n/a		n/a	28	n/a	0	n/a
St Arnaud	180	n/a	120	n/a	18	n/a	0	n/a
Murchison		n/a		n/a	14	n/a	0	n/a
Tapawera		n/a		n/a	12	n/a	5	n/a
Kaiteriteri	550	n/a	780	n/a	39	n/a	9	n/a
Marahau		n/a		n/a		n/a		n/a
Riwaka		n/a		n/a	21	n/a	5	n/a
Rest of District (ward remainder areas)		n/a		n/a	575	n/a	124	n/a
Sub total of rural environment	**1,700**	**1,700**	**2,490**	**2,490**	**1,180**	**1,180**	**512**	**512**
TOTAL DISTRICT	**4,178**	**4,673**	**7,256**	**7,971**	**3,113**	**3,499**	**3,399**	**3,833**

Business Land Demand 2024 and 2026 Urban Environment								
Growth Model area	**2024 HBA demand for business land (ha)**	**2024 HBA demand for business land (ha) with competitiveness margin (20%)**	**2024 HBA demand for business land (ha)**	**2024 HBA demand for business land (ha) with competitiveness margin (15%)**	**2026 analysis demand for business land (ha)**	**2026 analysis demand for business land (ha) with competitiveness margin (20%)**	**2026 analysis demand for business land (ha)**	**2026 analysis demand for business land (ha) with competitiveness margin (15%)**
	Years 1-10 (2024-2034)	**Years 1-10 (2024-2034)**	**Years 11-30 (2034-2054)**	**Years 11-30 (2034-2054)**	**Years 1-10 (2027-2037)**	**Years 1-10 (2027-2037)**	**Years 11-30 (2037-2057)**	**Years 11-30 (2037-2057)**
Richmond	4.6	5.52	6.39	7.35		14.81		18.37
Brightwater	0.63	0.76	0.94	1.08		0.66		0.81
Māpua/Ruby Bay	0.23	0.28	0.3	0.35		1		1.23
Motueka	2.56	3.07	3.61	4.15		4.94		6.13
Wakefield	0.19	0.23	0.27	0.31		1.63		2.04
Subtotal of urban environment	**8.21**	**9.86**	**11.51**	**13.24**		**23.04**		**28.58**

Business land demand 2024 and 2026 rural environment and TOTAL for District		
Growth Model area	**2024 HBA demand for business land (ha)[2]**	**2026 analysis demand for business land (ha)[3]**
	Years 1-30 (2027-2057)	**Years 1-30 (2027-2057)**
Moutere	2.22	1.05
Tākaka	2.08	1.6
Collingwood		
Pōhara/Ligar/Tata		
St Arnaud	0.32	2.89
Murchison		
Tapawera		
Kaiteriteri	0.75	1.7
Marahau		
Riwaka		
Rest of District (ward remainder areas)	7.07	**7.15**
Sub total of rural environment	**12.44**	**14.39**
TOTAL DISTRICT (URBAN AND RURAL)	**35.54**	**66.01**

[2] Competitiveness margin not applied to the rural environment

[3] ibid

Appendix 6

Comparison of PC81 sites yields between 2024 and 2026

Town and DA (as at 2024)	PC81 site ref (residential only)	2024 growth model assumed yield of PC81 site (RER capacity)	2026 refined yield of PC81 site for notification (RER capacity)	Difference 2024-2026 (note not staged) over 30 years
Brightwater				
DA28	T-002 and T-103	52	29	-23
DA30	T-104a	40	30	-10
Māpua				
DA27	T-11a/b	120	136	+16
DA27	T-33a	158	249	+91
DA27	T-250	120 not in FDS but comprises remaining yield in DA27	54	-66
DA27	T-245	100 not in FDS as deferred zoned (Fairmont devt)	101	+1

Town and DA (as at 2024)	PC81 site ref (residential only)	2024 growth model assumed yield of PC81 site (RER capacity)	2026 refined yield of PC81 site for notification (RER capacity)	Difference 2024-2026 (note not staged) over 30 years
DA11	T-42	178	140	-38
DA8	T-237a	199 assumed for whole of DA8 (excl 30 for Mount Hope devt)	135	+106
DA8	T-237b		32	
DA8	T-237d		1	
DA8	T-237g		137 (total 305)	
DA1	T-238a	69 assumed for whole of DA1	28	+11
DA1	T-240b		2	
DA1	T-246a		50	
DA7	T-240a	Site was not in FDS but yield of 5 from DA7	7	+2
DA9	T-33b	40	53	+13
Richmond				
DA2, 60, 61, 63, 59, 70	T-112, T-22, T-178a	1239	1255	+16

Town and DA (as at 2024)	PC81 site ref (residential only)	2024 growth model assumed yield of PC81 site (RER capacity)	2026 refined yield of PC81 site for notification (RER capacity)	Difference 2024-2026 (note not staged) over 30 years
DA72	T-114a	40	19	-21
DA71	T-115a	86	90	+4
Richmond WR	T-223b	11	11	0
DA43	T-232a	n/a came about through feedback, was all business in 2024	30	+30
Wakefield				
DA28, DA29	T-29a, T-29c, T-30	119	48	-71
DA30	T-194a	194	240	+105
DA30	T-194b		59	
Motueka and Motueka Valley				
DA15 (Moutere)	T-17a	195 in total	45	+415 (largely due to papakāinga)
DA15 (Moutere)	T-213 and T-205		14	

Town and DA (as at 2024)	PC81 site ref (residential only)	2024 growth model assumed yield of PC81 site (RER capacity)	2026 refined yield of PC81 site for notification (RER capacity)	Difference 2024-2026 (note not staged) over 30 years
DA15 (Moutere)	T-17b		520 papakāinga	
DA15 (Moutere)	T-17c		21	
DA15 (Moutere)	T-17d		10 (610 total)	
DA56 (Motueka)	T-189a	10 Not an FDS site but yield planned for	10 papakāinga	0
DA58 (Motueka)	T-190a	263	174	-89
DA31 (Motueka)	T-206	30	30	0
Tākaka/Pōhara				
DA21 (Tākaka)	T-138a	181	98	-83
DA WR GB	T-140a	42	42	0
DA16 (Tākaka)	T-144	63	66	+3
DA29 (Pōhara)	T-227	3 Not an FDS site but yield planned for	3	0
Tapawera				

Town and DA (as at 2024)	PC81 site ref (residential only)	2024 growth model assumed yield of PC81 site (RER capacity)	2026 refined yield of PC81 site for notification (RER capacity)	Difference 2024-2026 (note not staged) over 30 years
DA11	T-217	6	4	-2
St Arnaud				
DA WR Lakes Murch	T-181a and T-219a	20	20	0
Moutere				
DA6	T-226	130 Not an FDS site but yield planned for	130 papakāinga	0
		3,713	4123	**+410 (415 of which are papakāinga in Moutere)** **+5 without that site**