



## **Nelson Tasman Climate Forum**

### **Submission on Tasman District Council Plan Change 81 - Urban Development**

**Prepared by NTCF Submissions Group**

**03 August 2026**



## SUMMARY

1. This submission addresses the Tasman District Council Plan Change 81 (*'PC81'*), focusing on providing for urban development in the short, medium and long terms.
2. National Policy Statement – Urban Development (NPS-UD) requires planning decisions (including *PC81*) to contribute to well-functioning urban environments by enabling diverse housing and business opportunities, accessibility, competitive markets, **reduced greenhouse gas emissions, and climate resilience** (emphasis added). Our submission focusses on the emissions reduction and climate resilience aspects of NPS-UD Policy 1.
3. We **support in principle** the application of medium density residential zoning in Tasman District through Plan Change 81.
4. We **recommend** the following:
  - that the Medium Density Residential Zones (MDRZs) under PC81 be limited to existing urban areas.
  - that the Council commit to regular site-specific evaluations of progress with MDRZs to facilitate refinement of the policy as necessary
  - that the Council engage in further dialogue with community groups, including iwi, retired people's groups and young people's groups to build shared understanding of Medium Density Residential Zoning
  - that the Council provide and consider quantified information on the emissions reductions associated with the development options in PC81 before final decisions are taken
  - that specific expectations be set for resilient outcomes from PC81
  - that other nature-based initiatives, such as urban wetlands, rain gardens and other green spaces, be included in *PC81*
  - that Council recognise the financial and human resources opportunity costs of the higher per-person infrastructure costs associated with low density housing and greenfield development, in the light of the forthcoming task under the current Climate Change Response Amendment Bill to ensure councils prepare climate adaptation plans for priority areas.

## 1. INTRODUCTION

1. The Nelson Tasman Climate Forum (NTCF) thanks the Tasman District Council for the opportunity to make a submission on *Plan Change 81 ('PC81')* and *Regional Policy Statement Change 1*. Our submission focusses on *PC81*.

## 2. WHO WE ARE

2. NTCF is a community-led climate action initiative. We aim to weave the community together around urgent, strategic action to achieve the following goals:
  - rapidly reduce the region's greenhouse gas emissions, increase carbon sequestration and undertake other climate stabilising initiatives, consistent with the urgency of the situation
  - adapt to the likely adverse environmental effects of climate change and the resulting social and cultural effects, using inclusive and responsible decision-making to support these desirable outcomes
  - respond to climate change in a way that recognises the rights of all living organisms, including people, and provides for a just, equitable, and resilient society.
3. The Forum is re-constituting itself as an Incorporated Society. It currently has approximately 50 members, 1200 people on the mailing list, and collaborative relationships with multiple organisations.
4. We acknowledge the kaitiaki status of local iwi as Manawhenua, tangata whenua of this rohe.
5. *Please note* that whilst Tasman District Council has signed the Nelson Tasman Climate Forum Charter, this submission has been prepared completely independently of the Council. This submission is in no way intended and nor should be construed to represent the views of the Council in any way.

## 3. PLAN CHANGE 81 AND CLIMATE EMISSIONS AND RESILIENCE

6. The purpose of *PC81* is to give effect to the National Policy Statement Urban Development 2020 (NPS-UD, updated 2022), and to have regard to Council's Future Development Strategy 2022 (FDS) and the Māpua Masterplan (MMP).
7. Policy 1 of the NPS-UD requires planning decisions to contribute to well-functioning urban environments by enabling diverse housing and business opportunities, accessibility, competitive markets, **reduced greenhouse gas emissions, and climate resilience** (emphasis added). Our submission focusses on the emissions reduction and climate resilience aspects of NPS-UD Policy 1.

8. *PC81* includes many well considered ideas designed to address the radical changes needed to house our growing communities. Medium Density Residential Zoning is presented as a pragmatic way forward.
9. Our contribution lies in sharing our relevant local knowledge of climate impacts and local community responses to climate change.
10. In principle, we support Medium Density Residential Zoning (MDRZ) within urban areas because it will reduce per-person greenhouse gas emissions from transport and generally from sharing land and infrastructure, as well as contributing other benefits such as greater urban vibrancy. This is clearly more likely where there are commercial sites enabling local jobs to be created and you have included this commercial zone planning.
11. We **recommend** that the Medium Density Residential Zones under *PC81* be limited to existing urban areas. This is what other councils across Aotearoa have done<sup>1</sup>. This focus makes it easier to gain community acceptance and is cheaper for councils to implement. Urban MDRZs also use existing infrastructure and therefore pose less developmental risk to Council.
12. *PC81* asserts (Appendix 1, p. 251) that larger greenfield sites (cf. infill sites) are better for MDRZs as they would 'require integrated urban design ... and can optimise density and resident amenity through the careful consideration of the layout of infrastructure, allotment and dwellings'. We could find no evidence to support this assertion. In fact, we are aware of robust research showing very significant ongoing costs from urban sprawl which are not directly incurred by property developers. This includes additional costs of infrastructure, burden on rural schools, and burden on semi-rural medical centres<sup>2</sup>. Conversely there are significant spillover benefits from urban intensification including for people's health and social vibrancy<sup>3</sup>. Hamilton City, for example, is currently prioritising walkable communities as part of introducing MDRZs<sup>4</sup>. We **recommend** the Council also take the opportunity for best practice in design, such as the inclusion (e.g. in Schedule 17.1AA: Medium Density Residential Design Matrix) of solar (e.g. rooftop north orientation), garden water tanks, and high-quality disabled access as part of the medium density housing specification for Tasman District.
13. We **recommend** that the Council commit to regular site-specific evaluations of progress with MDRZs to facilitate refinement of the policy as necessary. Contrary to the *PC81* assumption that larger MDRZs will be more efficient, experience in Cairns for example found that smaller medium density housing (MDH) urban developments have proven to be more financially viable than larger ones<sup>5</sup>. Smaller complexes have much cheaper body corporates and are still insurable and affordable. The ability to insure and therefore finance and/or sell a property is an important long-term viability consideration when constructing new MDHs.

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<sup>1</sup> For example: [Whangarei](#).

<sup>2</sup> OECD 2018. [Rethinking urban sprawl: moving towards sustainable cities](#).

<sup>3</sup> For example: Collins *et al.* 2024. [Unveiling social vibrancy in urban spaces with app usage](#).

<sup>4</sup> [Independent Hearing Panel recommendation: tracked changes to the Operative Hamilton City District Plan](#).

<sup>5</sup> Gibson, S. & L. Law 2022. [Barriers and opportunities for medium density housing in small, regional cities: stakeholder perspectives from Cairns](#).

14. Medium density residential housing is needed but is not yet a widely accepted idea in our region. In welcoming this initiative to form MDRZs in urban areas, we **recommend** that the Council engage in further dialogue with community groups, including iwi, retired people's groups and young people's groups to build shared understanding of Medium Density Residential Zoning. This initiative will have a major impact on future living and therefore we think this is vital. 'Research shows that a policy framework of urban concentration, through greater residential density, is only successful where consumers and providers of housing support its practical application'<sup>6</sup>.
15. A key interest in stemming urban sprawl relates to the additional greenhouse gas emissions from transport. Tasman is already one of the highest transport emitters in NZ with very high rates of car ownership<sup>7</sup>. Given the importance of emissions reductions in Policy 1 of the NPS-UD, we expected the Integrated Transport Assessments (Appendix 3, Attachments 1-5) to present quantified emissions scenarios for the development options of PC81, but we do not find these. Their absence does not engender confidence that development options have been adequately assessed in relation to the full scope of NPS-UD, and nor in relation to priority actions specified in the Tasman Climate Response and Resilience Strategy and Action Plan 2024-2035<sup>8</sup>. Certainly, the significant passive transport benefit from MDRZs sought from Policy 6.4A.3.2 of *PC81* (Appendix 1, p. 25) will not be fully realised if they lean towards greenfield activity. We **recommend** the Council provide and consider quantified information on the emissions reductions associated with the development options in PC81 before final decisions are taken.
16. Resilience is mentioned just five times in *PC81 Appendix 1* (a 509-page document), four times in relation to roads and water pipes and just once to climate resilience. *PC81* is expected to contribute a huge increase in the number of homes in this region, making it even more important to get it right. Many of our existing homes already face increasing resilience issues because of climate change including flooding and inundation. It is vital for sustainability of our communities that everyone is able to find a secure place to live. We **recommend** specific expectations be set for resilient outcomes from PC81.
17. There would be merit in requiring all new housing including medium density housing to have solar cell power generation and storage, especially given the recent policy announcements by major political parties to support rooftop solar installation. This will reflect the current evidence of disruption risks in Tasman both from earthquake<sup>9</sup> and from climate.

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<sup>6</sup> Lilley, S.J. 2005. [Digging the dirt on density: a study of medium density housing in Christchurch's Living Three zone](#).

<sup>7</sup> Environmental Health Intelligence 2025. [Number of motor vehicles](#).

<sup>8</sup> We find no reference to the Tasman climate response and resilience strategy and action plan 2024-2035 in the PC81 documentation.

<sup>9</sup> [Scientific research](#) indicates there is a 75% probability of an Alpine Fault earthquake occurring before 2068 year. This is earlier than the oft-quoted 'in the next 50 years'.

18. Policy 6.8.3.24 proposes to establish an open space network in Richmond West that ‘links the hills to the sea’, and amongst other things is intended to ‘enhance climate resilience’. We **recommend** that other nature-based initiatives, such as urban wetlands, rain gardens and other green spaces<sup>10</sup>, be included. The government has identified this area of work as a priority<sup>11</sup>.
19. We further **recommend** that Council recognise the financial and human resources opportunity costs of the higher per-person infrastructure costs associated with low density housing and greenfield development, in the light of the forthcoming task under the current Climate Change Response Amendment Bill to ensure councils prepare climate adaptation plans for priority areas.

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<sup>10</sup> Forest & Bird 2024. [Choose Nature-based solutions](#).

<sup>11</sup> Ministry for the Environment 2022. Aotearoa New Zealand's first emissions reduction plan. [Chapter 4 Working with nature](#).