

Wakefield Plan Change 76 – Housing Evidence

Introduction

My full name is Jacqueline Dawn Deans. I hold a Bachelor of Arts with Honours in Urban Studies from Sheffield Hallam University and a Master of Philosophy in Town Planning from University College London. I have worked as an environmental policy planner and the growth co-ordinator for Tasman District Council for nearly eleven years. I have worked in the town planning profession, mainly as a consultant, for over 30 years, in the UK, Australia, Zimbabwe and New Zealand.

I appear on behalf of the Environmental Policy team of Council. I have previously acted as the reporting officer for Council on two plan changes and have prepared affidavits for a High Court hearing. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and that I agree to comply with it.

My evidence assists Plan Change 76 by providing context from Council's latest Housing and Business Assessment, Future Development Strategy and housing preferences survey to seek a well functioning urban environment in Wakefield.

Executive summary

Plan Change 76 for Wakefield introduces a requirement for subdivision for lots of the Wakefield development area¹ to enable increased and varied housing densities and types. This is to enable smaller lot sizes in Wakefield, encourage and promote quality medium density development and ensure efficient land use.

Clause 3.11 of the National Policy Statement on Urban Development (NPS UD) requires Local Authorities, when changing plans, to use evidence particularly any relevant Housing and Business Assessments (HBA), to assess their contribution to achieving well- functioning urban environments and meeting the requirements to provide at least sufficient development capacity. This paper sets out that evidence.

Evidence from the following sources is relied upon –

- 2024 Tasman Housing and Business Assessment (HBA) [Draft Housing Business Assessment Tasman March 2024 for Consultation.pdf \(hdp-au-prod-app-tasman-shape-files.s3.ap-southeast-2.amazonaws.com\)](#)
- 2024 Nelson Tasman Tier 2 Urban Environment HBA [Draft Housing and Business Assessment Nelson Tasman Tier 2 Urban Enviro March 2024 for Consultation.pdf \(hdp-au-prod-app-tasman-shape-files.s3.ap-southeast-2.amazonaws.com\)](#)
- Housing We'd Choose survey 2021 which informed the HBA [Capacity assessments | Tasman District Council](#)
- Nelson Tasman Future Development Strategy (FDS) 2022-2052 [Future Development Strategy 2022 - 2052 | Tasman District Council](#)
- 'Homes for Wakefield' community group survey 2020

¹ Area between Pitfure Road, Edward Street and Higgins Road

- 2023 Annual Monitoring report under the NPS UD [Monitoring reports | Tasman District Council](#)

Key conclusions of evidence

1. Both Tasman District and Wakefield are projected to grow over the next 30 years. Wakefield is projected to grow from 2,650 people in 2024 to 4,460 people in 2054. Demand exists for over 800 dwellings in Wakefield over the next 30 years according to the 2024 HBA
2. At 2018 just 17% of dwellings in the Moutere-Waimea ward were 1 and 2 bedrooms, yet the highest population growth in Tasman will be in the 65+ age group, which is projected to increase by 50% between 2023 and 2053.
3. The 2020 Homes for Wakefield survey found that the future most popular housing typologies were (in this order): 1-2 bedroom homes, retirement units, lifestyle properties, 3-4 bedroom homes and tiny homes. 60% of respondents supported 1-2 bedroom homes. The authors of the survey recommended that developers and Council *“should include more housing options, particularly 1-2 bedroom homes and retirement units.”*
4. At 2022/2023, in Tasman, stand-alone houses continue to be the dominant emerging housing typology, with attached dwellings comprising 19% of total new dwellings, which include retirement villages
5. According to the Housing We’d Choose survey, 29% of residents living in the Tasman urban environment (Richmond, Brightwater, Wakefield, Māpua, Motueka) prefer an attached dwelling or apartment. 37% of older residents living in the combined Nelson Tasman urban environment prefer attached dwellings or apartments
6. Habitat for Humanity is currently exploring proposals to build houses in Wakefield and it supports the Homes for Wakefield survey findings in terms of its understanding of the housing market there.
7. 28% of all respondents for the Housing We’d Choose survey could not afford to buy or rent anything when their income and houses prices/rents were taken into account
8. A mismatch exists between the demand for smaller dwellings e.g. attached and apartments and the availability of such properties in Tasman’s urban environment, both now and in the future
9. In Wakefield over the next 30 years there is estimated demand for almost 280 attached dwellings. Based on known realistic capacity, there would only be approximately 100 such dwellings in Wakefield. Apart from the Wakefield development site there are few opportunities in Wakefield to deliver medium density housing.
10. The situation across the whole of the Tasman urban environment compounds – amounting to a shortfall of 735 attached dwellings over the 30 years (295 in the first ten years). For the combined Nelson Tasman urban environment, due to Nelson’s shortfall of attached dwellings in the medium and long terms, there is an overall shortfall of 1,754 attached dwellings over the 30 years.
11. Submissions on the FDS 2022 showed clear support (80%) for a range of housing choices to be provided that meet different needs of the community, including papakāinga and affordable housing needs. Individual comments plus the 29 submitters who used the Nelson Tasman 2050 template cited a need for smaller and more affordable housing typologies in the regions. Such responses echoed earlier engagement on the Long Term Plans 2021 and 2024 and the Tasman Environment Plan.

Other relevant context

In adopting the FDS in 2022, the Joint Committee of Nelson City and Tasman District Councils requested that the FDS notes greenfield development will enable different housing typologies and that both Councils consider plan provisions that make a range of section sizes mandatory, while retaining flexibility over housing typologies built in housing plan changes.

Objective 1 and Policy 1 of the NPS UD seek well functioning urban environments to enable a variety of homes that (i) meet the needs, in terms of type, price, and location, of different households.

Policy 5 of the NPS UD applies to the tier 2 Nelson Tasman urban environment, to enable heights and density of urban form commensurate with the greater of level of accessibility or relative demand for housing in that location. Evidence of demand for medium density housing in Wakefield exists and active transport options exist in Wakefield, while a bus service now operates between Wakefield village hall in Whitby Way, Richmond and Nelson during the week.

Housing evidence for the Plan Change

Tasman is a growing region and the Council's three yearly HBAs continue to demonstrate this. These assessments are required under the NPS UD and the Future Development Strategy (FDS) is a long term strategic planning tool which sets out how we will meet the growing demand for housing and business land. The 2024 HBA shows that all age groups in Tasman are projected to grow but the highest growth continues to be in the 65+ age group.

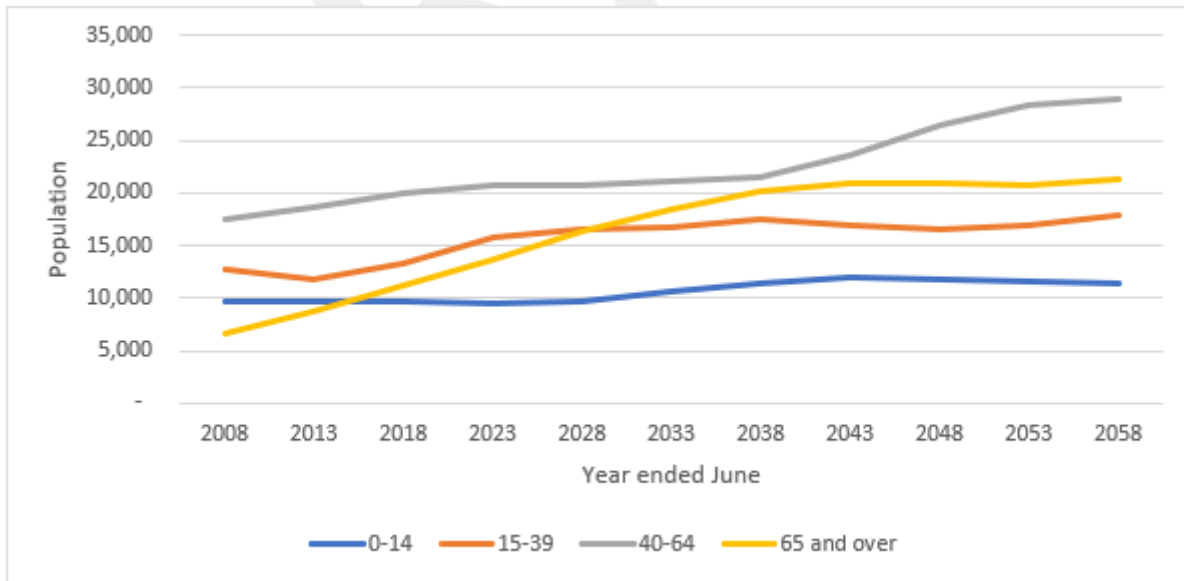
Plan Change 76 is being progressed to meet Council's obligation under the RMA to provide at least sufficient capacity to meet housing demand. It is implementing the adopted 2022-2052 Future Development Strategy (FDS) for Wakefield, in respect of one site (T-107), the Wakefield development area.

The 2024 Tasman HBA provides latest population projections provided by an external demographer in 2023:

Growth Model Area	Total Population (as at 30 June)				
	2022	2024	2034	2044	2054
Richmond	16,950	17,400	19,400	21,390	22,530
Brightwater	2,340	2,460	3,010	3,640	4,230
Māpua/Ruby Bay	2,870	2,970	3,350	3,730	3,970
Motueka	8,330	8,630	9,720	10,490	11,110
Wakefield	2,510	2,650	3,230	3,910	4,460
Subtotal of urban environment	33,000	34,110	38,710	43,160	46,300
Moutere ^a	5,800	6,090	7,380	8,640	9,820
Golden Bay Ward	5,740	5,870	6,250	6,350	6,270
Lakes-Murchison Ward	4,170	4,240	4,460	4,480	4,400
Rest of District	9,950	10,180	11,050	11,750	11,960
Total District	58,660	60,490	67,850	74,380	78,750

Source: Table 1 2024 Tasman Housing and Business Assessment 'Summary of population projections'

The 2024 Tasman HBA also provides projected population by age group (see fig 7 below). All age groups in Tasman are projected to experience growth. However, the highest growth continues to be in the 65+ age group, which is projected to increase by 50% between 2023 and 2053, forming 28% of the population by 2034. This increase, known as structural ageing, means that total population growth rates are projected to slow down over time. Once a population has more than 20% aged 65 years and over, it is usually approaching the end of natural increase. Tasman reached that threshold in 2016 and has experienced relatively low natural increase in recent years.



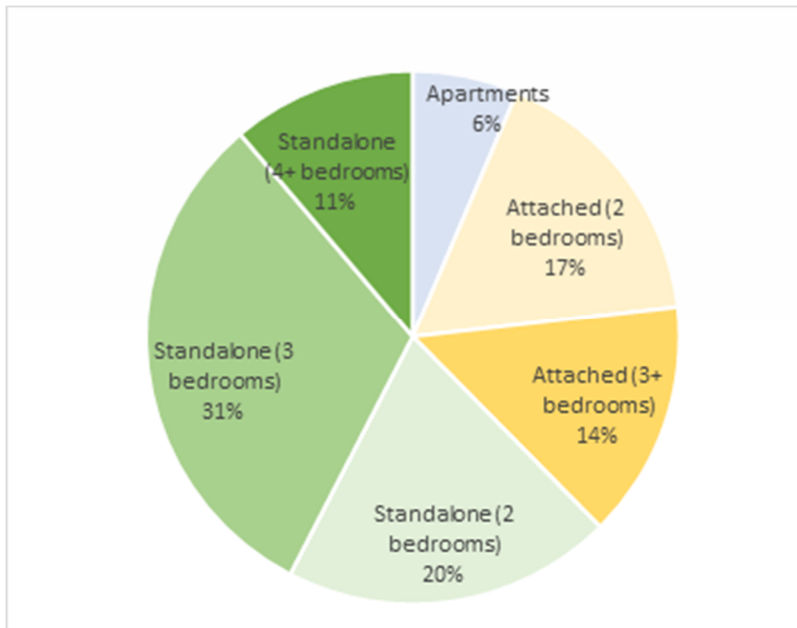
Source: Figure 7 2024 Tasman Housing and Business Assessment 'Estimated and projected population by age group 2008-2053 Tasman District'

According to the 2024 Tasman HBA the dwelling demand in Wakefield for the next 30 years is as follows:

Growth Model Area	Demand for new dwellings	Demand for new dwellings
	Years 1-10 (2024-2034)	Years 11-30 (2034-2054)
Richmond*	1,152	2,156
Brightwater*	242	592
Māpua/Ruby Bay*	192	352
Motueka*	644	1,093
Wakefield*	248	573
Subtotal of urban environment	2,478	4,766
Moutere ¹⁵	606	1,290
Golden Bay Ward	362	298
Lakes-Murchison Ward	183	124
Rest of District	547	777
Subtotal of rural environment	1,698	2,489
Total District	4,176	7,255

Source: Table 2 2024 Tasman Housing and Business Assessment 'Demand for new dwellings – Tasman District' (*towns forming part of the Nelson Tasman urban environment)

Council’s “Housing We’d Choose” survey (see below) in 2021 found that 62% of older residents in the Nelson Tasman urban environment prefer standalone dwellings, but that a significant proportion also prefer attached dwellings (31%) and a further 6% prefer apartments.



Source: Figure 11 Tasman Housing and Business Assessment 2021 “Housing preferences for Nelson Tasman older people living in the urban environment.”

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

Nelson and Tasman, as stated in the National Policy Statement on Urban Development (NPS UD), share an urban environment as these areas form part of the same housing and labour market. The Joint Committee of the Nelson City and Tasman District Councils on 10th Nov 2020 approved the extent of the urban environment for the NPS UD:

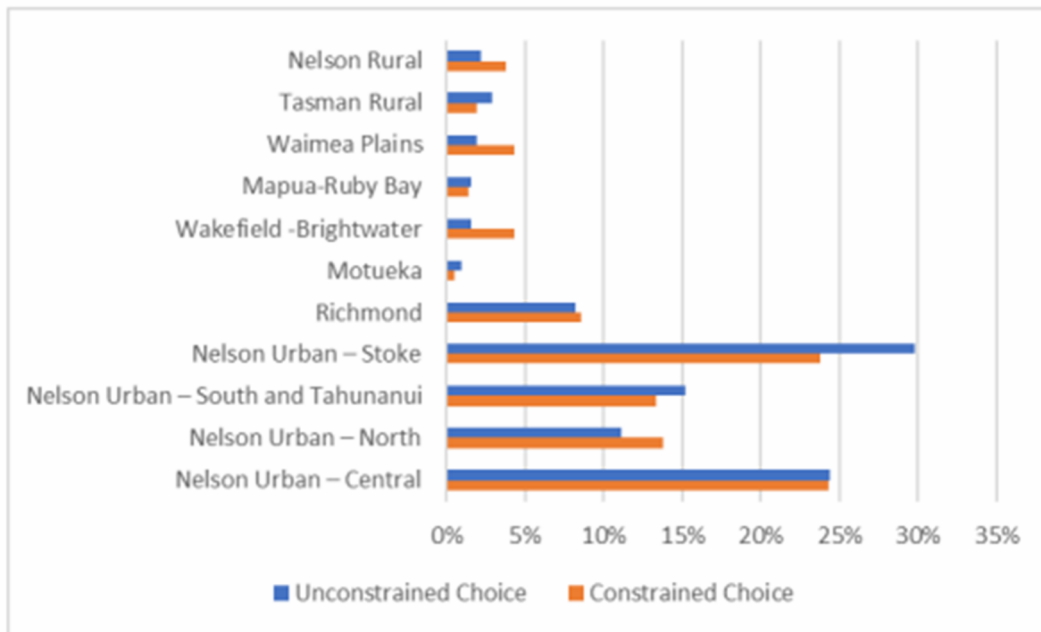
2. ***Approves the inclusion of the settlements of Nelson, Richmond, Motueka, Mapua, Wakefield, Brightwater, Cable Bay and Hira as part of the ‘Urban Environment’ in recognition that these communities are part of the same labour and housing market.***

Both Tasman District and Nelson City Councils commissioned a “Housing We’d Choose” survey for Tasman and Nelson in 2021 which surveyed the housing preferences of residents living in the Nelson Tasman urban environment.

The Housing We’d Choose survey found that within Richmond, Brightwater, Māpua, Wakefield and Motueka, 71% of the 300 respondents preferred a standalone dwelling; 5% would like to live in an apartment; and 24% would like to live in an attached dwelling. For Nelson the same figures were 65% for a standalone dwelling, 7% an apartment and 28% an attached dwelling. These choices were income constrained. 34% of all respondents could not afford to buy any dwelling; 5% of these could afford a

rental and the remaining 28% could not afford to buy or rent anything.² Therefore roughly one third of all residents living in the Nelson and Tasman urban environment preferred an attached dwelling or apartment.

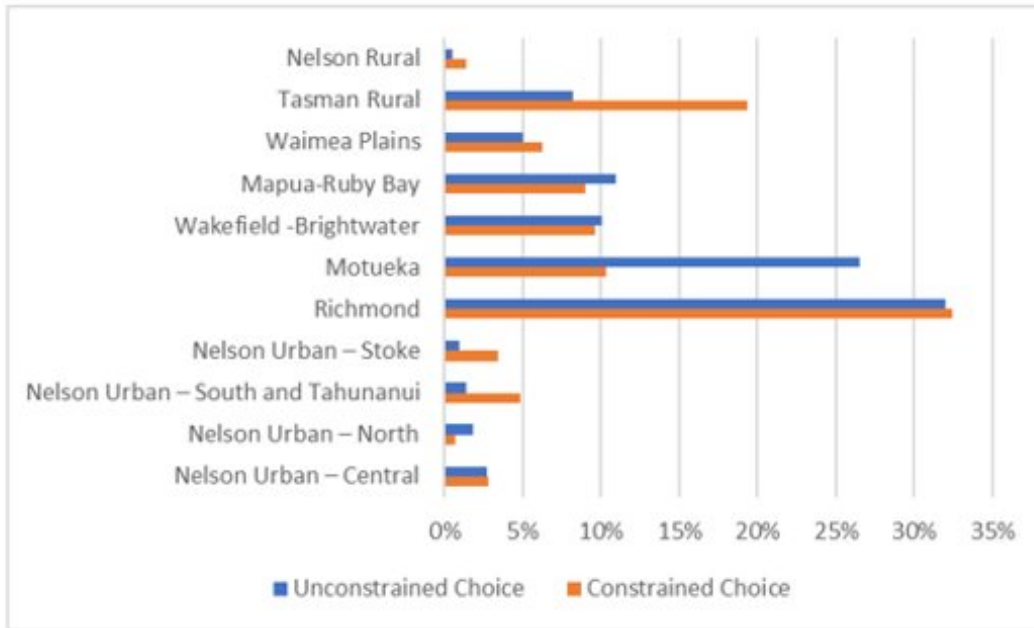
The results for Nelson’s urban area have relevance for Wakefield, as well as the Tasman results. In illustrating the fact that the urban environment is shared between the two Territorial Authorities, 4% of Nelson residents (when income constrained) selected Wakefield and Brightwater as their preferred dwelling location.



Source: *Housing We’d Choose report 2021, Figure 4.13 Dwelling location – Unconstrained vs constrained choice experiment – Nelson Urban*

Whereas 9% of Tasman urban residents selected Wakefield and Brightwater as their income constrained preferred location:

² Housing We’d Choose Survey – the survey final sample (622) comprised the Nelson Tasman urban environment – Nelson, Richmond, Brightwater, Wakefield, Māpua and Motueka. Overall the survey has a confidence level of +/- 3.9% inside the maximum recommended for these types of surveys +/- 5%.



Source: *Housing We’d Choose report 2021, Figure 4.14 Dwelling location – Unconstrained vs constrained choice experiment – Tasman Urban*

Housing typologies in Tasman

Only 15% of all houses built in Tasman between 2013 and 2018 had two beds or less. During the same period there was a decrease in the number of dwellings built that had one bed (e.g. in 2018 there were no one bed dwellings built). So overall between 2013 and 2018 just 12% of new dwellings had one or two beds. (Source – Housing and Business Assessment 2021 page 62).

An increasing proportion of new dwellings in Nelson have been attached dwellings, such as retirement village units, townhouses, and apartments, which were 51% of Nelson’s new dwellings in 2022/2023, just over a third of which were retirement village units. In Tasman, stand-alone houses continue to be the dominant housing typology, with attached dwellings at 19% of total dwellings in 2022/23. These have been recently built in Tākaka, Richmond (Kāinga Ora and Habitat for Humanity) and Motueka.

There is a mismatch between the demand for smaller dwellings e.g. attached and apartments and the availability of such properties.

Nelson Tasman Future Development Strategy 2022-2052

The Nelson Tasman Future Development Strategy (FDS) 2022-2052 was adopted by Tasman District and Nelson City Councils in August 2022. The then Rural 2 zoned parts of the Wakefield development area were assessed and included in the adopted FDS sites, site T-107. The developer’s draft masterplan at the time was used to define the boundary of the land likely to be developed for housing:



Source: FDS mapviewer [Future Development Strategy 2022 - 2052 | Tasman District Council](#)

The FDS Subcommittee heard submitters at the hearings and deliberated before making recommendations back to the Nelson Tasman Joint Committee.

Submissions on FDS

Outcome 4 (later renamed objective 4) of the draft FDS was for a range of housing choices to be provided that meet different needs of the community including papakāinga and affordable housing needs. 51% of the 359 respondents to this question strongly agreed with this objective and a further 29% agreed and key themes that emerged from the free form comments included:

- concern that the FDS will not achieve this outcome because of the perceived lack of diversity of housing options proposed
- that changing demographics in the regions are resulting in changing housing demand and preferences towards smaller footprint homes rather than larger detached dwellings
- the ageing population and the way that intensification can provide for the demand from older people for smaller homes, close to centres and amenities

Individual comments included:

- *“too many big houses are being built in subdivisions that don’t cater for the downsizers and smaller budgets”*
- *“However, I assume that what you are going to develop / open up for development will be more of what we have seen in the last 40 years: rich people decide what new houses will be built (large ones, unaffordable for others), and poor people will have to make do with the leftovers, ie*

unhealthy homes or not enough smaller homes, so living in their car or an old moldy house bus or caravan”

- *“I support this outcome but I can't see anything in the strategy that will achieve it because there is no detail about how the developer-led preference for standalone housing will change to the smaller more affordable housing which is needed.”*

Similar comments to those above, *supporting a range of housing types and smaller homes* were received during the engagement on the FDS in October 2021, including from youth groups. Community engagement on the Long Term Plans 2021 and 2024 and the Tasman Environment Plan (TEP) in late 2020 also found our community wants *smaller homes and housing for all ages/family types – including first home buyers, aging population*. One of the strongest top 4 themes from the TEP engagement in 2020 was housing – summarised as sustainable growth and safe, affordable places to live.

Question 19 of the FDS survey for consultation (Statement of Proposal) focused on the *housing intensification proposals in Wakefield around Arrow Street* and 319 people answered this question. 31% of respondents agreed or strongly agreed with the proposals. 23% disagreed, 27% were neutral and 15% did not know. In the comments section, respondents supported *more affordable options; support for different, smaller more intense types of housing around the suburb centre to make it more of a community*. 29 submitters to the FDS used the Nelson Tasman 2050 submission template or endorsed the submission. This submission amongst other things *sought for smaller and more affordable housing typologies in the regions*.

Question 26 of the FDS survey focused on greenfield housing growth in Wakefield. 15% agreed and 41% disagreed with the proposal of more greenfield growth in Wakefield. 25% were neutral and 17% did not know.

The Subcommittee, in making its recommendations to the Joint Committee of the Nelson City and Tasman District Councils considered community views as one input into its decision making process. During FDS deliberations, the Subcommittee was concerned over *inefficient use of greenfield land for housing and associated sprawl, as well as increase in greenhouse gas emissions from low density residential development*. The Subcommittee was also concerned with *ensuring smaller homes are provided*, in response to submissions. As a result, some worse performing greenfield sites were removed from the draft FDS (including sites in Pigeon Valley in Wakefield), replaced with better performing sites closer to the Nelson/Stoke area. The following recommendations by the FDS Subcommittee were included in the Joint Committee report of 29th July 2022, and were approved:

- 4. Requests staff to add clarification in the final FDS on intensification and greenfield development, noting that greenfield development will enable intensification and different housing typologies, and these typologies will be differentiated on the maps where applicable;***

(Source Attachment 1 to Joint Committee report of 28/7/22 and attachment 1 of the Joint Committee report of 29/8/22)

8. recommends to both councils that they explore the use of inclusionary zoning and consider plan provisions that make a range of section sizes mandatory, while retaining flexibility over housing typologies built, in housing plan changes and/or plan reviews;

CARRIED

Moved Deputy Mayor Bryant/Deputy Mayor Edgar

(Source minutes from Joint Committee 29/7/22 and attachment 1 of the Joint Committee report of 29/8/22).

In accordance with clause 3.17 of the NPS UD, Plan Change 76 has had regard to the FDS. It is implementing the FDS recommendations of both Councils to make more efficient use of land, reduce greenhouse gas emissions and require a range of section sizes, to ensure smaller homes are provided in line with the Nelson Tasman communities' wishes.

[National Policy Statement Urban Development \(updated 2022\)](#)

Relevant objectives and policies of the NPS UD for Plan Change 76 are as follows:

Objective 1 of the NPS UD is for well functioning urban environments that enable all people and communities to provide for their social, economic and cultural well being.

Policy 1 of the NPS UD seeks well functioning urban environments to enable a variety of homes that (i) meet the needs, in terms of type, price, and location, of different households.

Policy 5 of the NPS UD applies to the tier 2 Nelson Tasman urban environment, to enable heights and density of urban form commensurate with the greater of level of accessibility or relative demand for housing in that location. Evidence of demand for medium density housing exists in Wakefield. In terms of accessibility, active transport routes already exist near to the site and a regional commuter bus service Wakefield village hall to Richmond and Nelson commenced in August 2023. The Wakefield service operates 6 times a day during the week.

Clause 3.2 of the NPS UD requires sufficient development capacity for housing. Every tier 1, 2, and 3 local authority must provide at least sufficient development capacity in its region or district to meet expected demand for housing: in existing and new urban areas; and for both standalone dwellings and attached dwellings; and in the short term, medium term, and long term.

Clause 3.24 of the NPS UD requires a HBA to estimate demand in different locations and in terms of different dwellings types. Clause 3.25 of the NPS UD requires a HBA to quantify development capacity in different locations and of different types including stand alone and attached dwellings.

[2024 Tasman HBA](#)

According to the 2018 Census, of the 19,770 occupied private dwellings in Tasman District:

- 90% were separate houses
- 8% were joined dwellings and
- 2% were 'other.'

Based on the 'Housing We'd Choose survey' preference results, the following number of dwellings by each type in the Tasman urban environment are required to meet demand:

Table 10: Tasman Urban Housing Preferences (constrained choice) and Demand by Dwelling Type

	Preference (constrained choice)	Years 1-10	Years 11-30
Apartment	4%	104	209
Attached	25%	653	1309
Standalone	71%	1855	3717
Total Demand for new Dwellings in Tasman Urban Environment	100%	2612	5235

Source: Table 10 HBA 2021

Section 5.2.2 of the 2024 HBA quantifies development capacity in different locations and of different types of dwellings. It concluded that there is insufficient capacity for attached dwellings in the Tasman urban environment as a whole and in Wakefield individually in the short, medium and long terms. Hence further efforts should be made for zoning of attached housing and apartments.

Location	Attached Dwellings		Detached Dwellings	
Short Term Years 1-3				
	Demand (including margin)	Capacity	Demand (including margin)	Capacity
Motueka	69	10	169	124
Māpua/Ruby Bay	20	0	48	44
Richmond	103	98	252	539
Brightwater	23	0	56	69
Wakefield	24	20	58	106
Tasman urban environment	238	128	584	882
Medium Term Years 4-10				
	Demand (including margin)	Capacity	Demand (including margin)	Capacity
Motueka	155	47	380	144
Māpua/Ruby Bay	47	0	115	204
Richmond	298	351	729	624
Brightwater	61	10	150	122
Wakefield	63	29	153	70
Tasman urban environment	624	437	1527	1,164
Long Term Years 11-30				
	Demand (including margin)	Capacity	Demand (including margin)	Capacity
Motueka	365	200	892	701
Māpua/Ruby Bay	117	0	287	834
Richmond	719	800	1761	1,969
Brightwater	197	82	484	701
Wakefield	191	70	468	676
Tasman urban environment	1589	1,152	3892	4,881

Source table 13 2024 Tasman HBA 'housing land capacity by type of dwelling' – red text indicates cumulative deficit

In Wakefield over the next 30 years there is estimated demand for almost 280 attached dwellings. Based on known realistic capacity, there would only be approximately 100 such dwellings in Wakefield over

this period. Apart from the Wakefield development site there are few opportunities in Wakefield to deliver medium density housing.

The situation across the whole of the Tasman urban environment compounds – amounting to a shortfall of 735 attached dwellings over the 30 years (295 in the first ten years).

The HBA for the Nelson Tasman Tier 2 urban environment shows that due to Nelson’s shortfall of attached dwellings in the medium and long terms, there is an overall shortfall of 1,754 attached dwellings over the 30 year period.

Plan Change 76 has implemented the requirements of the NPS UD. Objective 1 and policy 1 of the NPS UD seek well functioning urban environments that meet the needs, in terms of type, price, and location, of different households. Plan Change 76 seeks to provide such capacity.

Homes for Wakefield survey

‘Homes for Wakefield’ was formed in early 2020 by a group of people who aim to give the Wakefield community a greater voice in the future of housing. At the end of 2020 a local survey was undertaken to enquire about residents’ thoughts about housing in Wakefield. Council was provided with a summary of the results by the authors of the survey. Key conclusions drawn were:

- 194 responses were received, with a fair representation across age groups
- 60% were from families and 30% from couples with no children
- 91% of respondents owned their own home
- 90% of respondents placed strong importance on both having community facilities in Wakefield and strong importance on outside activities
- 70% of respondents had some level of concern about housing issues in Wakefield and this concern increased with age of respondents
- In terms of future housing options for Wakefield, a wide range of typologies were favoured, with the most popular being (in this order): 1-2 bedroom homes, retirement units, lifestyle properties, 3-4 bedroom homes and tiny homes. 60% of respondents supported 1-2 bedroom homes. Approx 75% of respondents aged 18-44 supported lifestyle properties and 3-4 bedroom homes. Tiny homes had most support from those in the 45-64 age group. (It’s important to note that these housing types were the only ones offered for ranking in the survey.)
- In response to support for attached (duplex) homes, 34% were in support, 19% were neutral, and 47% did not support.
- In response to support for multi level homes, 38% were either in support or neutral with 62% not supporting.
- 20% of bespoke responses to the survey specified homes to be ‘affordable ‘

The authors recommended that developers and Council *“should include more housing options, particularly 1-2 bedroom homes and retirement units.”*

Habitat for Humanity is currently exploring proposals to build houses in Wakefield and it supports the Homes for Wakefield survey findings in terms of its understanding of the housing market there.

Plan Change 76 relevant rules

In order to encourage and promote quality medium density development, ensuring efficient land use in the Wakefield Development Area, the Plan Change introduces a requirement for subdivision for a variety of lot sizes and housing densities and types.

Proposed subdivision rules require that for a controlled activity in the Wakefield Development Area, at least 15% of the allotments have an average net site area of 360 sq m or less, with a minimum of 200 sq m and a maximum of 450 sq m. The minimum net area for the remaining allotments is 200 sq m. However these provisions do not apply where compact density provisions are used in which case there are no minimum allotment area requirements for the compact density development.

Proposed permitted land use rules in certain circumstances enable maximum building coverage of 50% and maximum site coverage of 70%. Other conditions include side and rear boundary setbacks (generally 4 metres from one side or rear boundary to an adjoining site and 1 metre from the nearest part of any other building) and building envelope (for the most southern orientated side or rear boundary, all buildings are wholly within an envelope that is taken from a point 3 metres vertical above the boundary; for the remaining side and rear boundaries, all buildings are wholly within an envelope created by taking a vertical line from the boundary 6 metres above ground level and then at an angle of 45 degrees inwards from that point). Maximum height of any building is 7.5m.