



Te Kaunihera-ā-Rohe o Ngāmotu

**New Plymouth
District Council**

FUTURE DEVELOPMENT STRATEGY SUBCOMMITTEE MEETING AGENDA

**Friday 10 May 2024
(reconvened from Wednesday 24
April 2024)**

10am

Plymouth Room
Liardet Street, New Plymouth

Chairperson:	Mr Stephen Daysh
Members:	Ms Fern Brand (Ngā Iwi o Taranaki)
	Cr David Bublitz (NPDC)
	Cr Amanda Clinton-Gohdes (NPDC)
	Cr Susan Hughes (TRC)
	Cr Donald McIntyre (TRC)
	Vacant (Ngā Iwi o Taranaki)

COMMITTEE PURPOSE

Purpose of Local Government

The reports contained in this agenda address the requirements of the Local Government Act 2002 in relation to decision making. Unless otherwise stated, the recommended option outlined in each report meets the purpose of local government and:

- Promote the social, economic, environmental, and cultural well-being of communities in the present and for the future.
 - Would not alter significantly the intended level of service provision for any significant activity undertaken by or on behalf of Council, or transfer the ownership or control of a strategic asset to or from Council.
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OPENING KARAKIA

Tutawa Mai

Tūtawa mai i runga	I summon from above
Tūtawa mai i raro	I summon from below
Tūtawa mai i roto	I summon from within
Tūtawa mai i waho	I summon from the
Kia tau ai	outside environment
Te mauri tū	to calm and settle
Te mauri ora	the vital inner essence
Ki te katoa	the wellbeing of
Haumi e, hui e, tāiki e!	everyone
	Be joined,
	together united!



Te Kaunihera-ā-Rohe o Ngāmotu

**New Plymouth
District Council**

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APOLOGIES / NGĀ MATANGARO

None advised

CONFLICTS OF INTEREST / NGĀ ARA KŌNATUNATU

1. People who fill positions of authority must undertake their duties free from real or perceived bias. Elected members must maintain a clear separation between their personal interests and their duties as an elected member. Failure to do so could invalidate a Council decision and leave the elected member open to prosecution and ouster from office.
2. An elected member is entitled to interact with the Council as a private citizen. However, they cannot use their position as an elected member to gain an advantage not available to the general public.
3. Elected and appointed members will:
 - Declare any interest whether pecuniary or non-pecuniary at a meeting where the interest is relevant to an item on that agenda.
 - Exclude themselves from any informal discussions with elected members relating to a matter they have an interest in.
 - Seek guidance from the Chief Executive if they are unclear of the extent of any interest.
 - Seek guidance or exemption from the Office of the Auditor General if necessary.

REPORTS

ITEMS FOR DECISION BY COMMITTEE

- 1 Future Development Strategy – Proposal Following Hearing of Submissions

END

FUTURE DEVELOPMENT STRATEGY – PROPOSAL FOLLOWING HEARING OF SUBMISSIONS

MATTER / TE WHĀINGA

1. The matter for consideration by the Council is a revised draft Future Development Strategy following the hearing of submissions.

RECOMMENDATION FOR CONSIDERATION / NGĀ WHAIKUPU

That having considered all matters raised in the report Council:

Note that the Future Development Strategy Subcommittee has received all the written, verbal and late submissions on the draft FDS and supporting information; and

- a) **Adopt the Future Development Strategy 2024 - 2054 (including the tracked changes) as set out in Appendix 1(H)**
- b) **Adopt the Future Development Strategy 2024 Implementation Plan (including tracked changes and actions) as set out at the end of Appendix 1(H)**

COMPLIANCE / TŪTOHU	
Significance	This matter is assessed as being significant.
Options	There is only one reasonably practicable option: 1. Adopt a Future Development Strategy
Affected persons	The persons who are affected by or interested in this matter are the citizens of New Plymouth District, the development sector and Mana Whenua
Recommendation	This report recommends option 1 for addressing the matter.
Long-Term Plan / Annual Plan Implications	Yes
Significant Policy and Plan Inconsistencies	No

EXECUTIVE SUMMARY / WHAKARĀPOPOTOTANGA MATUA

2. This report seeks adoption of a Future Development Strategy for Ngāmotu New Plymouth 2024 – 2054 and associated FDS Implementation Plan 2024/2025.
3. Written and verbal submissions have been received and considered by the Future Development Strategy Subcommittee in April 2024. Council officers have considered the matters presented in the submissions, and following questions from the subcommittee have updated their recommendations for a Future Development Strategy and Implementation Plan.

BACKGROUND / WHAKAPAPA

4. The National Policy Statement on Urban Development (NPS-UD) 2020 (updated 2022) requires development of a Future Development Strategy (FDS) for districts like New Plymouth, which are designated as Tier 2 Urban Environments. New Plymouth District and Taranaki Regional Councils (the Councils) are required to work together to ensure their strategic plans support and coordinate growth and development across the district.
 5. The FDS must be updated every three years, and a new one prepared every six years.
 6. Following the hearing of submissions to the Draft FDS and in response to matters raised by Subcommittee members during the hearing, Council Officers from Taranaki Regional Council and New Plymouth District Council have:
 - a) Updated the Council Officer’s recommendation incorporating responses to questions raised by submitters and subcommittee members during the hearing.
 - b) Provided an updated summary of recommendations.
 - c) Drafted an outline of proposal for Ngāmotu Growth Advisory Panel.
 - d) Sought and received a memo from Property Economics about the Retirement Market.
 - e) Compiled case studies of infill housing under the Proposed New Plymouth District Plan.
 - f) Sought and considered updated modelling of housing capacity to inform the FDS which was received following the close of submissions and the hearing. This includes a memo from Property Economics about intensification (which includes infill) and NPDC advice about greenfield (including undeveloped residential) land.
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- g) Prepared an "accept/reject" table with recommendations for each of the 36 submissions.
- h) Updated the Draft FDS (with tracked changes) for the Subcommittee's consideration.
- i) Updated the Draft FDS Implementation Plan (with tracked changes) which includes an action list based on recommendations for the Subcommittee's consideration.

These documents have been appended to this report.

Changes since receipt of the written and verbal submissions

- 7. Having considered the matters raised in submissions, Council Officers are proposing the following high level changes to the Draft FDS:
 - a) Amendments to reflect the updated advice and modelling in relation to housing capacity.
 - b) Amendments to FDS Outcomes.
 - c) A new section named "Future Growth Planning" which addresses collaboration, transparency and exploring new ways to approach development.
 - d) Amendments to the sections on "Planning for and provision of Infrastructure" and "Climate Change" to include additional wording agreed between Powerco, Transpower and the Councils.
 - e) Moving text from the FDS to the FDS Supporting Technical Document, relating to the growth scenarios.
 - f) Removal of the FDS Implementation Plan to a standalone document and additional text to the FDS "Implementation" section.
 - g) A new section named "Monitoring and Review" setting out how capacity will be monitored and assessed.
 - 8. In addition, Council Officers are proposing a number of changes to the Draft FDS Implementation Plan relating to timing of actions, following consideration of a number of matters discussed at the hearing.
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CLIMATE CHANGE IMPACT AND CONSIDERATIONS / HURINGA ĀHUARANGI

9. There are a range of considerations relating to Climate Change that inform the Draft FDS and these are included in the Draft FDS (Section 3.5).

REFORM IMPLICATIONS

10. The FDS and FDS Implementation Plan are required to be prepared under the NPS-UD, which is an instrument issued under the Resource Management Act 1991. A related instrument relevant to land supply for urban development is the National Policy Statement for Highly Productive Land (NPS-HPL).
11. On 30 April 2024, the government announced the first of two bills to be introduced in 2024 which will make some targeted changes to the Resource Management Act. Amendments signalled in this announcement do not include the NPS-UD or NPS-HPL.
12. However, previous announcements which were part of the government's 100 day plan outlined that the Ministry for the Environment is exploring options around the definition of highly productive land (HPL) to enable more flexibility. The messaging included that urban expansion onto HPL can already occur in certain circumstances, but officials are reviewing the NPS-HPL to consider how it could enable more greenfield housing development.

NEXT STEPS / HĪKOI I MURI MAI

13. On adoption of the FDS and FDS Implementation Plan, the following would occur:
 - a) Update, finalise and publish to FDS and FDS Implementation Plan incorporating directions from the Hearing Panel.
 - b) Include the documents and information on Council's website.
 - c) Progress the actions identified in the draft FDS Implementation Plan.

SIGNIFICANCE AND ENGAGEMENT / KAUPAPA WHAKAHIRAHIRA

14. In accordance with the Council's Significance and Engagement Policy, this matter has been assessed as being significant as there are implications for future planning. The Councils have undertaken a Special Consultation Process to enable them to understand the views and preferences of the community. No further engagement is required prior to adopting a final FDS.
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OPTIONS / KŌWHIRINGA

There is only one reasonably practicable option – adopt a FDS. This is a statutory requirement, and the strategy must be adopted to inform the Long-Term Plan.

Financial and Resourcing Implications / Ngā Hiraunga ā-pūtea, ā-rauemi

15. The oversight of the FDS and associated FDS Implementation Plan will be carried out within existing operational budgets at NPDC. The actions identified within the FDS Implementation Plan have resourcing implications. The Growth and Services team have prepared a work programme based on the proposed draft FDS Implementation Plan actions to ensure a sustainable spread of work that can be managed within existing staff resourcing.
16. There is a requirement for technical reports to support the FDS Implementation Plan actions and there is operational budget sufficient to resource the required professional services to deliver this work. In addition, some of the FDS Implementation Plan actions (in particular Future Urban Zone (FUZ) structure planning) will be supported by developers/landowners.

Risk Analysis / Tātaritanga o Ngā Mōrearea

17. The draft FDS has identified a short fall in capacity in the long term. If Council does not undertake the actions identified in the Draft FDS to resolve the long-term shortfall then we will not be meeting statutory requirements under the NPS-UD. Where it is determined that there is insufficient capacity, the Council must inform the Minister for the environment and outline identified actions to address. Officer's consider this process of informing the Minister is outside the adoption of the FDS.

Promotion or Achievement of Community Outcomes / Hāpaitia / Te Tutuki o Ngā Whāinga ā-hāpori

18. Implementation of the FDS will contribute to all of the community outcomes.

Statutory Responsibilities / Ngā Haepapa ā-ture

19. Adoption of a FDS is a statutory requirement of the NPS-UD.

Consistency with Policies and Plans / Te Paria i ngā Kaupapa Here me ngā Mahere

20. While the FDS is a high level, non-statutory strategy it will inform a range of Taranaki Regional Council and New Plymouth District Council plans.

Participation by Māori / Te Urunga o Ngāi Māori

21. New Plymouth District Council's Ngā Kaitiaki roopū (a hapū and iwi resource management working group) met with Council Officers prior to developing a draft FDS for public consultation. The roopū assisted Officers with the refining of themes to inform the draft FDS.
22. Additional feedback was received at hui in relation to:
 - a) Housing choice – the need for both smaller whare and larger sites containing multiple whare for intergenerational living;
 - b) The need for whānau to live in places that they are traditionally associated with;
 - c) Housing affordability – places to rent and to buy;
 - d) Infrastructure needs to be in place or upgraded before growth occurs; and
 - e) Urban form must not degrade the natural environment.
23. The discussion points and feedback was collated and sent to hapū as information that could be reference in the forming of their submissions.
24. Iwi and hapū also submitted formally through the Special Consultation Procedure.

Community Views and Preferences / Ngā tirohanga me Ngā Mariu ā-hāpori

25. Council Officers sought feedback from the development and professionals' sector on how the district should grow prior to finalising the draft FDS for public consultation.
26. Community views and preferences were presented in written and verbal submissions and responses to the points raised are outlined in the appendices to this report.

Recommended Option

This report recommends option one – adopt a Future Development Strategy for addressing the matter.

APPENDICES / NGĀ ĀPITI HANGA

- Appendix 1 Officer's report back (ECM9248107):
- Appendix A Updated summary of recommendations (ECM 9248108)
 - Appendix B Ngāmotu Growth Advisory Panel – draft outline of Proposal (ECM 9248040)
 - Appendix C Review of Hastings District Council programmes (ECM9249269)
 - Appendix D New Plymouth Retirement Village Market Economic Memorandum (ECM 9249210)
 - Appendix E Medium Density Developments approved under the Proposed District Plan (ECM 9248046)
 - Appendix F NPDC memorandum on updated capacity figures for the FDS (ECM 9249216)
 - Appendix G Memorandum on updated intensification modelling prepared by Property Economics (ECM 9248058)
 - Appendix H Draft FDS with Tracked Changes (including draft FDS Implementation Plan with Tracked changes (ECM9248039)
 - Appendix I Officer's recommendations on submissions (ECM9248038)
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Report Details

Prepared By: Julie Straka (Manager Governance)
Team: Governance
Approved By: Renee Davies (Manager Strategic Planning)
Ward/Community: District Wide
Date: 8 May 2024
File Reference: ECM 9247533

-----*End of Report*-----



Officers' report back following hearing of submissions on the Draft Future Development Strategy for Ngāmotu New Plymouth 2024-2054



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[Appendix A: Updated summary of recommendations](#)

[Appendix B: Ngāmotu Growth Advisory Panel – draft outline of Proposal](#)

[Appendix C: Review of Hasting District Council Programmes](#)

[Appendix D: New Plymouth Retirement Village Market Economic Memorandum](#)

[Appendix D: Medium Density Developments approved under the Proposed District Plan](#)

[Appendix E: NPDC memorandum on updated capacity figures for the FDS](#)

[Appendix F: Memorandum on updated intensification modelling prepared by Property Economics](#)

[Appendix G: Officer’s recommendations on submissions](#)

[Appendix H: Draft FDS with Tracked Changes \(including draft FDS Implementation Plan with Tracked](#)

1 Introduction

1. This report back has been prepared to assist the sub-committee, by providing responses to questions asked of Council Officers and to provide responses to matters heard through presentations from submitters.
2. In the interest of succinctness, this report will not repeat the introductory sections of the Officers Report on Submissions. The content of this report will focus on specific questions put to officers by the subcommittee and on matters outstanding from previous reporting, such as the results of updated modelling and responses to this.
3. Appendix 1 of the Officer's Report included a list of recommended amendments to the Future Development Strategy) FDS, in response to written submissions. Additional recommendations have been added to this table in response to consideration of verbal submissions, shown as Appendix A to this report.

2 Responses to specific questions of the subcommittee

2.1 Growth Advisory Panel

4. Through the officers' recommendations on submissions, it was suggested that the establishment of an advisory panel would be a useful tool to consider various planning related matters that affect growth in the district.
5. Members of the subcommittee requested that consideration was given to the makeup and role of this panel. A draft proposal for this panel is attached as Appendix B of this report.
6. A request was also made for officers to consider whether this panel could include expertise and input from individuals/organisations with a mandate relating to affordable housing. Given the ranging nature of matters to be considered by this group, it is not considered necessary to embed this expertise within the overall makeup of the group. However, the terms of the draft proposal are such that additional expertise can input into the panel as needed.

2.2 Budget for work programme

7. In response to the questions regarding the budget available to undertake earlier feasibility/master planning studies for Future Urban Zones, this will be undertaken utilising existing LTP budget and managed through annual plans.

2.3 Indicative Road – Cottam Property

8. The subcommittee heard from representatives of the Cottams, who have concerns with the presence of the indicative road shown within the Proposed District Plan (PDP). Officers understand that the presence of the indicative road relates to a memorandum of

understanding between NPDC and NZTA/Waka Kotahi which indicates NPDC will construct a road parallel to the highway, to service the industrial area of Bell Block. This MOU related to the construction of the Bell Block bypass.

9. The indicative road was not submitted on through the PDP. As noted within original recommendations, officers suggested it would be appropriate to consider the Cottam's and surrounding properties through the Bell Block Spatial Plan. This is still considered the most appropriate means to consider this and surrounding properties.

2.4 Spatial Plans

10. Members of the subcommittee requested that consideration was given to defining the boundaries of the spatial plans being prepared or recommended to be prepared.
11. It is the Strategic Planning Team's intention that the spatial plans to be developed relate to a specific township as well as its wider surrounding area. The boundaries for each spatial plan would be identified as part of that planning process. Through the spatial planning process, new areas will be considered for additional residential and business growth.
12. The contract for the Waitara Spatial Plan is currently being appointed. The boundaries of this plan will be determined in conjunction with partners on this project, but it is anticipated it would include the township and rural interface, including sites suggested by submitters for consideration as additional greenfield areas.
13. It is envisaged that the Bell Block Spatial Plan would include a wide area between the Waiwhakaiho River to the Airport and would include consideration of the land accessed from Hoewaka Lane (subject to the submission of CGR), the Cottam land as well as other properties with the potential for future growth.
14. Similarly, the boundaries of a Spatial Plan for Inglewood would be defined through that process but would likely include the township and surrounding areas.

2.5 Urenui/Onaero Wastewater Treatment Plant

15. The subcommittee asked whether Council were putting forward the Urenui/Onaero WWTP to be considered for inclusion in the Fast Track Approvals Bill. Officers can confirm that this application has been made.
16. Te Rūnunga o Ngāti Mutunga requested that the WWTP was included within the implementation plan. This facility was not included in the original implementation plan as Urenui and Onaero have not generally been considered growth areas for the district, given the reliance on septic tanks and alternative solutions to wastewater reticulation. However, it is acknowledged, following hearing from Ngāti Mutunga, that the WWTP will enable development in the area and will also enable tangata whenua to develop land appropriately in locations such as Urenui Pā. As such, it is recommended that this project is identified within the implementation plan.

Additional Recommendation

- Amend the FDS implementation plan to include the Urenui/Onaero wastewater treatment plant as a project over the years 2024-2031.

2.6 Outcomes Statements

17. The subcommittee asked that officers consider the wording used within the ‘collaboration’ outcome statement. In particular, it was questioned whether the phrase ‘plan enabled’ was appropriate, and whether the statement was generally strong enough and clear in its intent.
18. After considering these questions and the ensuing discussion with hapū submitters, officers agree that the wording of this statement could be improved and suggest the following:

The Councils and tangata whenua work responsively with the development community and support ~~appropriate development~~ the delivery of plan-enabled capacity.

Additional Recommendation

- Amend the Collaboration outcome statement as follows:
The Councils and tangata whenua work responsively with the development community and support ~~appropriate development~~ the delivery of plan-enabled capacity.

2.7 Alternatives to wastewater treatment plant upgrades

19. The subcommittee requested that information was provided as to whether alternatives to the planned upgrades on the New Plymouth wastewater treatment plant had been considered. This questioning was based on the submission to the FDS and LTP by Bev Gibson on behalf of the Ngāti Tawhirikura uri (descendants) regarding the age and capacity of the current wastewater treatment plant. Following discussions with NPDC’s Three Waters planning team it is understood that, as a condition of the resource consent associated with the treatment plant, Council must consider alternatives and ways to reduce volumes of discharge from this facility.

2.8 Affordable Housing

20. The panel asked that officers investigate how other Councils are providing for affordable housing including the tools used, including matters such as what strategies they have employed to increase housing supply of medium density residential housing and how have their council partnered with local tangata whenua to increase housing supply.
21. The model used by Heretaunga Hastings District Council is multifaceted. Officer’s identified a large amount of information regarding the programmes and strategies that have been employed by Hastings District Council. These include:
 - Hastings residential intensification design guide 2020
 - Plan change 5
 - Constraints and infrastructure report
 - Hastings Medium and Long Term Housing Strategy

- Heretaunga Plains Urban Development Strategy
- Iona Structure Plan

22. Details of these initiatives are included within Appendix C of this report.
23. It is noted that the FDS and other planning related documents are only part of this bigger picture. An appropriate supply of land is obviously an important aspect of ensuring housing affordability. The FDS and District Plan also provide the enabling components for allowing the delivery of these types of development. However, they do not in themselves deliver the development.
24. Refinement and implementation of strategies such as the Taranaki Regional Housing Strategy will be vital in ensuring the delivery of affordable housing into the future.
25. It is suggested that the best course of action in this regard is for Council officers to work alongside representatives of the Taranaki Housing Initiative Trust, to understand how we can work together on this issue. Suggestions within the original officer recommendations to consider the establishment of an Intensification Action Plan are also likely useful actions.

2.9 Retirement Residential Market

26. The subcommittee requested that officers commission economic advice on the retirement market in relation to New Plymouth. This is attached as Appendix D. This memo indicates that the district is likely underserved in respect of retirement housing and that the Council should consider methods for bolstering suitable housing options for individuals aged 65+.
27. It is recommended that the Councils work proactively with the sector and developers to better understand how this demand can be met moving forward.
28. It is understood this industry typically has specific site requirements (i.e. large, flat sites). Although it is also noted that in other areas, different models are used with smaller overall footprints. A high-level analysis of sites greater than 6ha within the general residential zones (areas where retirement living is generally anticipated) has been undertaken. This shows a current availability of 22 sites.
29. In relation to the FDS, it is noted that the submission of Mr McKie has requested that Oākura South is rezoned residential to allow for the establishment of a retirement village. Officers have recommended further adjustment to the timing of undertaking master planning of this area. Other adjustments to the timing of Future Urban Zones will also mean that availability of land for this type of development will increase.

Additional Recommendation

- Amend the Implementation Plan to adjust the timing for undertaking masterplanning of Oākura South to 2025/2026.

2.10 Questions from evidence of Survey and Spatial NZ

30. During the evidence of Mr Broadmore for Spatial and Survey NZ, the subcommittee requested that clarification was provided as to why demand over the short-term was less than the average over the long-term. Clarification was also requested as to why table 1.1 of the HBCA had not outlined the 'infrastructure ready' aspects of development capacity.
31. The projected demand for New Plymouth District was commissioned from Infometrics as part of the Long-Term Plan and HBCA to help inform future decisions relating to growth.
32. As part of this forecast, Infometrics have maintained that demand for additional dwellings will drop from the previous rate of around 1-1.5% down to 0.7% in the short term only. It is understood this is largely due to market factors such as interest rates. With an average forecast of 294 new dwellings in the short term. These do recover over the medium term to an average of 439 out to 2034.
33. In relation to whether infrastructure ready aspects were considered, while not outlined in the table identified, Ms Peterson has confirmed that this aspect is considered in line with the requirements of National Policy Statement on Urban Development (NPS-UD). The spread of availability of development capacity over the short, medium and long terms takes into account the availability of infrastructure within each of those time periods. Updated modelling will be discussed later in this report, along with tables outlining infrastructure ready capacity.

2.11 Consideration of the Stormwater Flooding Non-District Plan Layer

34. Members of the subcommittee requested that officers confirm that the stormwater flooding layer of the PDP has been taken into account within the updated modelling. We advise the modelling applies an additional cost for development in these areas, which in-turn can affect the feasibility of development.
35. It was also requested that officers report back on the methodology used to determine the stormwater/flooding risk in these areas. Particularly in relation to the Fitzroy area. Confirmation of this point was sought from Councils Network Planning Engineers, who provided the following response:
 - The Flood Mapping is for a 1% AEP rainfall event with an RCP8.5 Climate Change allowance included. So this represents the flooding for a large rainfall event that, on a long term average, could happen about every 100 years but can happen any year.
 - The flood mapping is generated by computer modelling. The model takes the LiDAR ground surface (high accuracy land surface contours) and drops the rainfall evenly across the whole land surface. The model then determines where the stormwater will flow (overland flowpaths) and pond (local depressions and basins) as it travels across the land to reach the outlet location (usually rivers).
 - The model includes the stormwater pipe network, road networks and other key infrastructure that may influence how the stormwater flows across the land.

- The Flood Mapping presents a snapshot of the maximum flood extents for a 1%AEP event (with climate change) across the catchment. The rainfall is distributed evenly across the land surface as would happen in an actual rainfall event. The model then simulates where the stormwater will flow across the land surface as would actually occur during a large rainfall event.
- The flooding is not related to river water or flood levels but is related to rainfall falling across the catchment.

3 Outstanding matters and additional recommendations

3.1 Collaboration opportunities for growth planning

36. The officers' report identified that the delivery of our district's growth and development will come from our development community including iwi/hapū, infrastructure providers and government organisations. The Councils consider relationships with these parties, and tangata whenua as treaty partners, will be crucial in growth planning and implementing the PDP to realise capacity in well-functioning urban environments.
37. At the hearing submitters concerns around how the Council works with the development community were discussed and there was support from submitters for the recommendations in the officers' report relating to continuous improvement and engagement to support the efficient development and release of land.
38. Officers recommend that the actions to support collaboration put forward in the officers' report be embedded in the FDS itself. We recommend amendments to the FDS by way of the new "Collaboration" Outcome Statement (outlined above), as well as a new section named "Collaboration and Transparency". This "Collaboration and Transparency" section articulates the Councils' undertaking to continuously improve how we support the delivery of appropriate growth, and includes the following sub-headings:
 - Growth Advisory Panel
 - Ngā Kaitiaki Roopū
 - Developers Forum
 - Technical Professional Group
 - Regular Reporting

Additional Recommendation

- Amend the Draft FDS to include a section titled 'Collaboration and Transparency' which outlines the mechanisms to support collaboration and growth.

3.2 Tangata whenua relationships

39. We heard from hapū submitters of a desire to move away from considering developments on a consent-by consent basis, to having certain principles embedded early in the planning of growth areas. They also indicated a more programmatic approach to considering resource consents is needed.
40. Officers support the submissions of hapū. This is an ongoing piece of work and will occur over the differing planning timeframes and scales. It is considered vital that structure and master planning of future urban zones occurs with close involvement of hapū. This early work will ensure that consideration of aspects important to hapū are well considered early, making subsequent resource consents processes clearer.
41. Council officers also support the suggestions for a more programmatic approach to how hapū and engaged through consent processes. It is recommended that officers work alongside the Councils consents team and representatives of hapū, to develop what this process should look like.
42. The recognition of Te Rūnunga o Ngāti Mutunga's development aspirations are discussed in section 2.5 of this report and are also relevant here.
43. We maintain the position set out in recommendations in the original officers' report and have no further recommendations.

3.3 PDP impacting development and growth

44. A substantial focus in submissions and evidence presented through the hearing related to the impact that the PDP is having on development. We heard from various submitters regarding the uncertainty that the PDP has created and the importance of certainty for those looking to invest in development.
45. In particular, it was noted that certain rule triggers often mean that the consultation requirements of the Resource Management Act (RMA) are engaged. The delays that this can cause were raised as a risk which can stall or stop development.
46. These matters are a separate consideration from the provision of sufficient development capacity (plan enabled, infrastructure ready, feasible and reasonably expected to be realised), which will be discussed in detail within sections 3.4-3.5 of this report. However, it is acknowledged that, given they have implications on the delivery of housing and business and the provision of well-functioning urban environments generally, it is appropriate to outline suggested actions to ensure the PDP is fit for purpose and not unduly restricting development.
47. In considering aspects of the PDP which are reportedly causing strain to the development community, it is important to balance the issues raised by submitters, with the enabling components of the PDP. Appendix E of this report outlines projects which have been consented (note one is still being assessed) under the PDP. These include projects for higher density developments, which are providing for a range of housing types including one- and two-bedroom units. Across these five developments, approximately 66 units (ranging from one to four bedrooms) will be developed.

48. These are not applications that were typically received or consented under the Operative District Plan (ODP). Projects such as these are considered important developments in achieving the range of housing types and sizes that the district requires. It is noted that the decisions on the PDP were released in May 2023; these developments demonstrate a transition to provision for higher density developments, and the PDP is already achieving its intended purpose.
49. These applications utilised various enabling aspects of the PDP in consenting these developments. These include:
- Plan provisions enabling subdivision around existing or consented developments, regardless of lot size. In these situations, the effects standards (provision of appropriate living areas, setbacks, daylighting etc), do the 'heavy lifting', in terms of providing the anticipated amenity for the area.
 - Allowance for four or more dwellings on a site in medium density zones as a restricted discretionary activity. This includes a 'non-notification' clause which means that assuming relevant effects standards are met (building heights, setbacks etc.), a processing planner cannot consider parties affected.
 - Alternative daylighting rules allowing medium density sites to be developed more fully, where an appropriate level of amenity and sunlight access is provided to neighbouring sites. This again includes a non-notification clause.
50. These particular projects are highlighted as they show the potential for what can be achieved utilising these rules.
51. Irrespective of this, within the recommendations report, officers acknowledged that refinement to certain provisions of the PDP is warranted. While maintaining that the PDP was an important and necessary change of direction, officers acknowledged that aspects of the plan are causing issues for development. In the officer's report it was suggested that certain actions be undertaken to better understand and, where appropriate, adjust rules and standards that unnecessarily restrict urban development or create uncertainty.
52. These recommended actions include:
- Continue to resolve appeals on the PDP as quickly as possible so plan users only need to consider one district plan and so that rules and standards are refined where it is possible to do so.
 - The establishment of a Growth Advisory Panel to provide independent technical input into New Plymouth District Council's strategic planning for growth and development within the district.
 - Instigation of a plan change and/or plan changes to finetune the PDP and reduce duplication, inefficiencies and/or pinch points that are creating challenges for the provision of housing and development.
 - Continual monitoring of PDP effectiveness with a view to undertake a rolling schedule of plan changes to resolve identified issues impacting on growth.
 - Development of a PDP Implementation Plan to proactively assist change management and support the outcomes sought by the PDP.

- Consider the development of an Intensification Action Plan.
 - Consideration of incentives to enable development, such as revision of development contribution policy and consent fees for multi-unit developments.
53. Officers maintain that these are the most appropriate actions in relation to this key issue. In particular, officers note the role the Growth Advisory Panel will play in ‘co-designing’ plan provisions that are fit for purpose and recognise the practicalities of land development, while still managing adverse effects as needed.
54. To give certainty, it is suggested that timings are put around these key actions.
55. It is recommended that the Growth Advisory Panel is established immediately. A first task for this group will be to facilitate consideration of the pinch-points within the PDP and to scope and consider the potential content for a variation and/or variations to the PDP.
56. Council officers have a running list of PDP provisions they are aware of, which likely need some work to finesse. The development community will also hold information in this regard. It is anticipated that the Growth Advisory Panel would convene forums with members of the development sector to understand rules and standards within the PDP which, in their view, are creating issues. Engagement with iwi and hapū would also take place along with consultation with any group which may have interest in the provisions being considered.
57. The Growth Advisory Panel would then consider these rules and standards in finer detail, to understand the resource management issues they are intended to address and whether they are the most appropriate option for addressing these.
58. It is anticipated that recommendations coming from the Growth Advisory Panel would guide which PDP provisions will be considered through a plan change. As noted in the officer’s report, a variation or plan change is not uncommon during the early phases of implementing a district plan. The approach suggested would allow for a well-considered approach, reflecting the feedback of those groups using the rules on a day-to-day basis.
59. The exact make-up and structure of this variation or plan change will need to be considered, such as what topics to group, and whether certain discrete topics warrant their own separate process. It is likely this could include matters such as adjustments to unnecessarily restrictive standards, resolution of duplication, refinement of matters of discretion, and changing to a less restrictive activity status where appropriate.
60. NPDC would work towards publicly notifying this plan change mid-2025.
61. Additional recommendations specific to rules relating to Site and Areas of Significance to Māori (SASM) and Archaeological Sites (AS) are discussed within section 3.5 of this report.

Additional Recommendations

- Update implementation plan to schedule an omnibus plan change and/or plan changes (as required) relating to urban development with a view to publicly notify mid-2025

3.4 Modelling of Development Capacity

62. As noted within the officer's recommendation, Councils are required to supply sufficient development capacity to meet demand. To be counted as residential development capacity, land must be 'plan enabled', 'infrastructure ready', 'feasible' and 'reasonably expected to be realised'.
63. Updated modelling of both infill and greenfield development capacity has been undertaken since the hearing was adjourned. As noted within the officer recommendations and through the hearing, this modelling excluded land impacted by certain constraints. For the updated modelling, these constraints were agreed, where possible, between representatives of GJ Gardener (as a key submitter on this topic) and Council officers.
64. These matters included:
- a) Removal of any land restricted by an overlay or rule which would make housing use a discretionary activity (SASM/AS);
 - a) Removal of any land with a slope of 18 degree or greater;
 - b) Removal of land where any building platform would necessarily cross Council infrastructure;
 - c) Include updated inputs relating to development contributions, building costs and other associated costs; and
 - d) Applying additional costs associated with locating dwellings within the stormwater flooding overlay of the PDP.
65. There was disagreement in relation to whether to apply the SASM setbacks of the ODP, or only those from the PDP. The Council maintains the position that, for the purposes of the FDS, it is most appropriate to consider the PDP. As noted within the hearing, the FDS is a forward-looking document, in which it is appropriate to anticipate changes to planning documents that might enable additional development capacity. For example, an FDS might indicate that to achieve certain densities, changes to planning rules to enable this would be required. Assuming ODP rules relating to SASM will be resolved is the same principle. Environment Court mediation in relation to these rules is currently taking place. When resolution is made, the ODP rules will no longer be relevant.
66. It should be noted that, in relation to constraints such as slope, these matters were already considered in the conservative assumptions used in relation to yield for greenfield areas. For example, within the presentation of Mr Broadmore for SSNZ, he questioned why a certain area of land identified within the HBCA had been counted within our capacity figures (excerpt from presentation shown below in Figure 1).

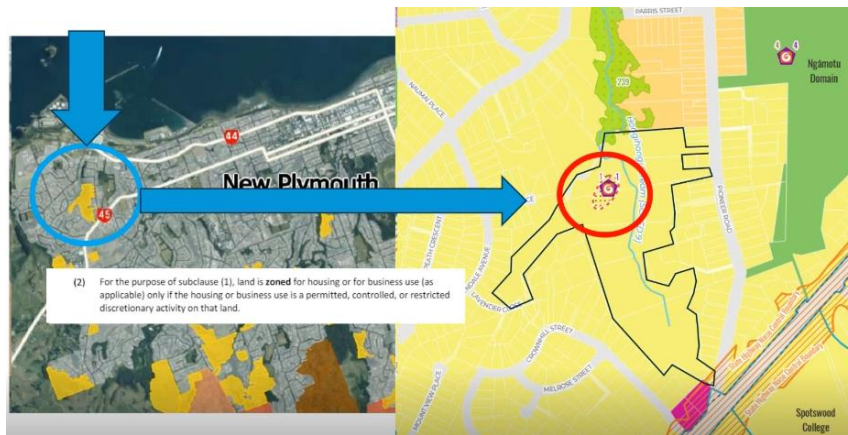


Figure 1: Excerpt from Survey and Spatial Taranaki presentation

67. While this land has been identified as undeveloped residential land, very little of it had been assessed as being suitable for development. In total this example contains nine different land parcels which make up 8.12 Ha of land. Portions of this land contain both Significant Natural Areas and SASM, but these features only impact some of the land parcels, not all of them. Given the slope of the overall area, it was assumed that only 5 dwellings per hectare could be developed in this location. Once consideration is given to the feasibility, infrastructure readiness, and whether development is reasonably expected to be realised, Council had only estimated 8 dwellings for this entire area with over 8.12 Ha of land.
68. This example is useful as it is important to note that while land may be identified on a map, it does not always mean that it is expected the entirety of a site will be developed. Irrespective, slope has been reconsidered through the updated modelling.

Modelling Results

69. Full details of the combined updated modelling with the additional constraints applied are outlined within Appendix F. This includes notes from Ms Peterson outlining the impact of the additional constraints in relation to greenfield sites. Appendix G contains a memo from Property Economics outlining the revised intensification modelling.
70. A summary of this information is shown below in table 1 and indicates total residential development capacity of 9,937.

Estimated Housing Demand	Demand + Margin	Reasonably Expected to be Realised with SASM and AS constraints applied	Capacity Surplus/deficit	2024 HBCA	Difference
9,445	11,026	9,937	-1,089	11,355	-1,418

Table 1: Summary of revised development capacity

71. This means that the district technically has an insufficiency of residential land of 1,089 over the long-term.

72. Importantly, and as discussed in section 3.5 of this report, this insufficiency only occurs in the long-term. Within the short and medium terms, there is a comfortable margin of available land.
73. A large part of the reduction of overall development capacity in these areas relates to a reduction in plan enabled and feasible capacity. The following sections will step through these matters.

Plan Enabled Capacity

74. As discussed at length within the hearing to date, to be considered 'plan enabled', housing use must be a permitted, controlled, or restricted discretionary on a given piece of land.
75. The reduction in plan enabled capacity is, in large part, due to the presence of Sites and Areas of Significance to Māori (SASM) and Historic Heritage/Archaeological Sites (AS) overlays of the PDP, within portions of larger greenfield sites. As noted within the officer recommendations, the rules of the PDP relating to SASM/AS are such that any subdivision of a site containing one of these features is a fully discretionary activity.
76. It is useful to look at some examples of where these reductions in plan enabled capacity have occurred due to the presence of these PDP overlays. Figure 2 identifies the parcel of land subject to the submission of the Thomsons, located within the Frankly/Cowling FUZ. This parcel contains various zonings with the northern portion currently zoned general residential, and the southern portion currently identified as Future Urban Zone. The presence of archaeological sites within the southern portion of this property will mean that any subdivision of the property as a whole would be a fully discretionary activity. As such, the entire site cannot be counted as being 'plan-enabled' in terms of the requirements of the NPS-UD.

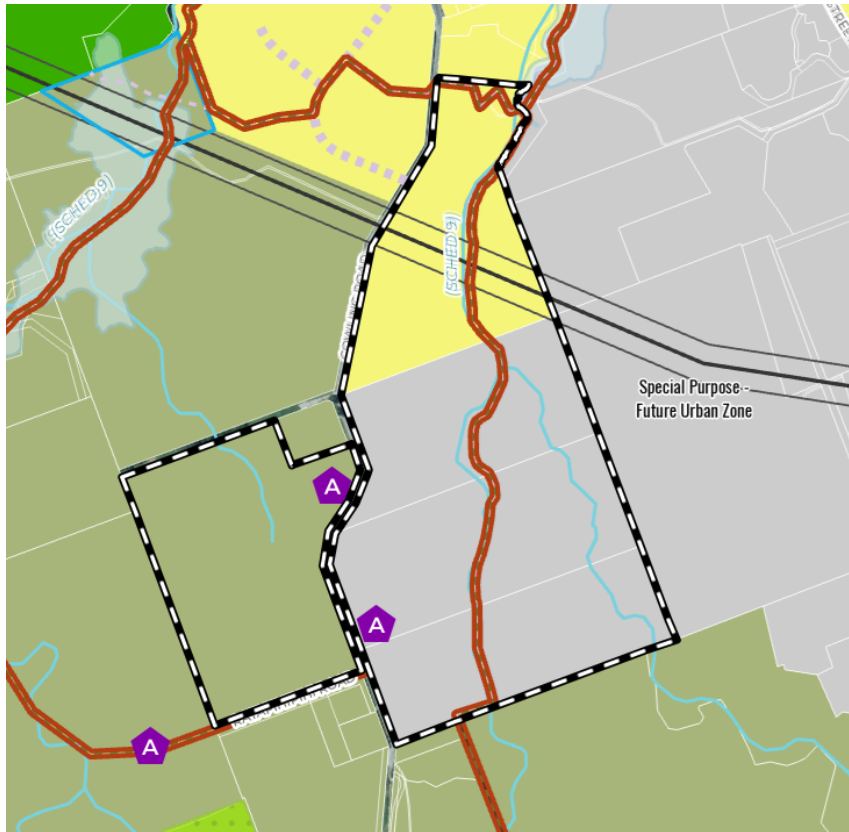


Figure 2: Land subject to the Thomson submission not able to be counted as plan enabled

77. Similarly, Figure 3 identifies the parcel of land containing Oākura South Future Urban Zone, the subject site of the McKie submission. Previously, the portion of this land shaded grey has been counted as a part of the long-term capacity calculations given its zoning as Future Urban Zone (FUZ). The presence of the SASM/AS within the eastern portion of the wider site means that any subdivision of the overall site would be a discretionary activity and as such, cannot be counted as being “plan enabled”.

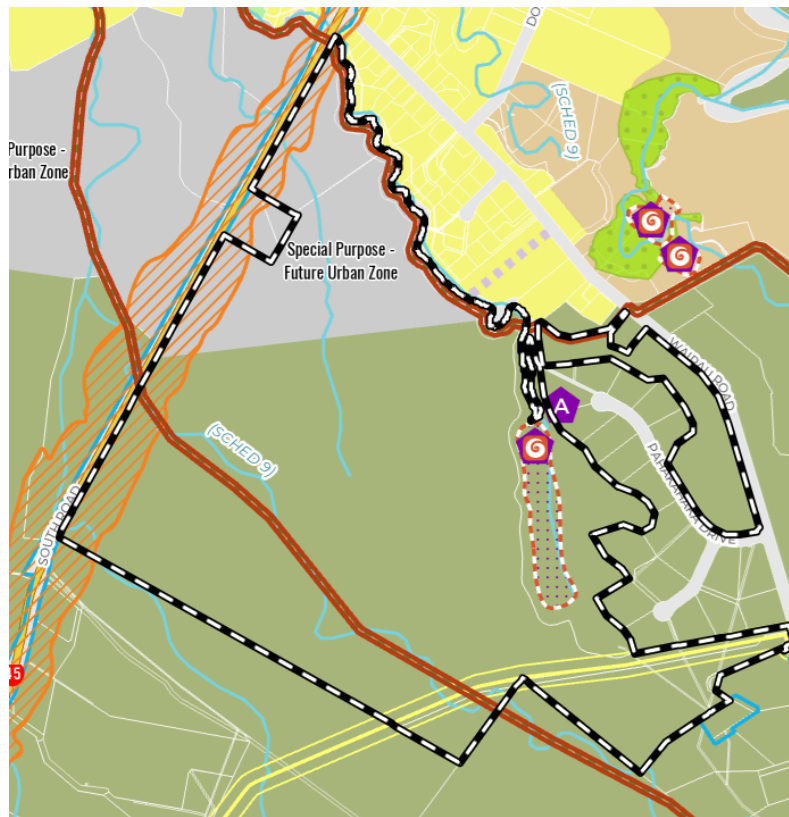


Figure 3: Land subject to the submission of Mike McKie not able to be counted as plan enabled

78. These examples are highlighted as they clearly show the implications that these overlays present in terms of providing sufficient 'development capacity' as defined within the NPS-UD. They also show that the suggested responses put forward by submitters (being rezoning, or changing in timing for delivery of future urban zones) do not solve the issue of whether a site can be counted towards development capacity under the NPS-UD, but rather shifts the issue to a different location.
79. In relation to intensification, as noted within the officers' recommendations and through the hearing, Property Economics have reconsidered the capacity provided. A memo outlining this modelling is provided within Appendix G. The updated modelling is designed to identify the impact of different constraints more accurately, by modelling the buildable floorspace areas based on the planning provisions.
80. Results of this updated modelling show that previous assessments undertaken by Property Economics were appropriate and that even though these assessments did not directly address all of the practical constraints, they were implicit in the more conservative assumptions.
81. To emphasise that capacity in existing urban areas is not an issue, Property Economics have included an additional permitted scenario, whereby two dwellings are constructed within lots sized between 400m² and 800m² in the general residential zone. This type of development can be undertaken as a Controlled Activity under the PDP. While not counted in our overall figures, as noted by Property Economics, this is a legitimate alternative scenario which increases intensification development capacity by 1256. If this was included in overall development capacity calculations, this alone would be sufficient to address the insufficiency identified.

82. This is highlighted to show the conservatism used in determining development capacity.

Feasible Capacity

83. In relation to greenfield areas, proposed increases in development contributions have also impacted on the feasibility of certain parcels of land. These are typically smaller parcels, with larger parcels still providing the necessary profit margin.
84. It should be noted that when undertaking revised feasibility assessments, decisions have yet to be made on Council's development contributions policy. Any changes to development contributions would likely have direct implications on the feasibility of development in these areas.

Infrastructure Capacity for Infill and Intensification

85. Over the horizon of the FDS, assuming upgrades and renewals in certain locations (which are planned and funded through the LTP and Infrastructure Strategy), there is sufficient infrastructure capacity to cater for projected intensification numbers.
86. Areas such as Waitara and Inglewood, which have clear short term infrastructure constraints are excluded as short-term capacity.
87. Certain district wide infrastructure projects are required to support growth in general, including intensification. These projects include:
- Supplementary water source.
 - Universal water metering.
 - Upgrades to the wastewater treatment plant.

Ongoing Work

88. The above matters lead to an additional point raised within the officers' recommendation report, that the nature of the requirements under the NPS-UD to ensure there is sufficient land available is cyclical. Feasibility can change significantly with changes in market conditions. Evidence presented through the PDP by Property Economics noted this temperamentality, where they outlined recent work undertaken in Wellington, whereby a 10% drop in land value, coupled with a 10% increase in building material costs, resulted in feasibility assessments for infill dropping by 40%.
89. As noted within recommendations, the Councils are committed to working alongside the development sector to continue to improve and refine modelling. This is an area of continuous improvement and also a continual cycle of monitoring, modelling and pivoting where needed. The Council will utilise the Planning Advisory Group to assist in refining this process and will pivot as needed.

90. As noted at the hearing, an HBCA is a 'snapshot in time' of our available capacity. If an HBCA identifies insufficient development capacity, certain steps must be taken in accordance with section 3.7 of the NPS-UD. These include:
- Immediately notifying the Minister for the Environment;
 - If the insufficiency is wholly or partly the result of RMA planning documents, these documents must be changed to increase development capacity; and
 - Councils must consider other options for increasing capacity and otherwise enabling development.
91. These steps will need to be followed, but do not affect the FDS, assuming the FDS includes a means to resolve the insufficiency identified (to be discussed in the following section).

3.5 Response to updated modelling

92. As these modelling results show, there is an insufficiency of 1089 in the long-term.
93. Submitters have indicated that to address a long-term shortfall, future urban zones and additional greenfield areas should be rezoned immediately.
94. As noted within the officer recommendations, the timing of the need for land should be a critical consideration of any response to this issue. As noted within the officers' recommendations, submitters have not made it clear why it would be necessary to live-zone additional FUZ and rezone additional greenfield immediately, when the concerns raised relate to long-term supply questions.
95. As noted within paragraph 78, the approach suggested by submitters is also not a logical response to the issue of ensuring we have sufficient development capacity. Several of the sites requested to be brought forward in timing of delivery contain SASM and/or AS. As such, changing the timing of when Council anticipates the need for these areas does not provide additional development capacity, as defined by the NPS-UD.
96. It is also not considered an efficient or affordable means to address any insufficiency in capacity. The increased costs of servicing these areas with infrastructure needs to be considered in the response.
97. As such, officers maintain the position outlined within the recommendations report that this is not the most appropriate option to resolve this issue. Rather, other options should be considered in relation to how to best respond to this issue and provide sufficient residential development capacity.

Reconsider the activity status relating to subdivision and development of land containing SASM and archaeological sites (AS)

98. In the first instance, it is considered most appropriate to investigate options to provide additional nuance to the provisions relating to SASM and AS of the PDP. It is recommended that this involves changing the activity status for subdivision and development of sites containing SASM and AS to a restricted discretionary activity. This would enable those portions of existing identified structure plan development areas, undeveloped residential land and

existing urban areas, currently restricted by overlays, to be considered ‘plan-enabled’ and developed in appropriate ways.

99. Table 2 outlines the difference in available development capacity comparing where activity status for subdivision of a site containing a SASM/AS is either a fully discretionary (as per current PDP requirements), or as a restricted discretionary activity (as per recommendations of this report).

Scenarios	Capacity (Dwellings)	Demand + Margin	Capacity Surplus/deficit
Development Capacity with SASM and AS - Restricted Discretionary	12,043	11,026	1,017
Development Capacity with SASM and AS - Discretionary	9,937	11,026	-1,089

Table 2:

100. This highlights that a change in activity status relating to SASM and archaeological sites would address the identified insufficiency in residential development capacity.
101. Importantly, being a restricted discretionary activity, it will still enable the protection of these sites, as required by Section 6 of the RMA. However, it would provide more nuance, by noting specific matters of discretion to be considered during any subdivision or development of a property containing these sites.
102. This option will, of course, require engagement to understand the impact of such changes. Through the hearing, evidence was presented by various hapū, indicating a desire to work with the development sector on those areas of land affected by the presence of SASM, AS and other important features.
103. Regardless of the activity status for residential development in proximity to SASM/AS, to realise the development potential of these areas, Council and developers will need to undertake early, high quality master planning and consideration of these features for areas identified for future growth.
104. This is reflected in the original officer recommendations, where it was recommended the feasibility studies of various future urban zones be brought forward.
105. The New Plymouth district has one of the densest concentrations of archaeological sites in NZ. Any site is archaeological if it contains evidence of pre-1900 human activity. Many archaeological sites were built on top of SASM, so many sites are of significance both archaeologically and to Māori. This important history is reflected in the large number of SASM and AS identified within the PDP.
106. Given the large number of sites and the importance of the area to mana whenua generally, it is considered essential that the Councils find a path forward to enable development in these areas in appropriate ways. The subcommittee has heard from submitters representing hapū of a desire to work with Council and developers to see growth areas developed, but in appropriate ways. The Councils are committed to this and are of the view that the FDS provides the tools to ensure this can happen.

107. Given this, it is recommended that the FDS indicates the need for a plan change to adjust the activity status and develop matters of discretion relating to SASM and AS.

Changing of timing and further investigations

108. In addition to the above, and in line with original recommendations, it is still considered appropriate to undertake more detailed investigations of areas for inclusion as growth areas, such as the western portions of the Frankley/Cowling FUZ, as requested by the Thomas submission and additional portions of the Puketapu structure plan development area, as requested by the Johnson submission. These areas in themselves offer potential significant additions to greenfield capacity.
109. To ensure that there are other options for growth available in the future, officers also maintain the position that additional areas within and on the periphery of Waitara, Bell Block and Inglewood should be considered for growth within the Spatial Plans being undertaken for these townships.
110. Officers have considered what would be a realistic work programme in bringing forward the master planning and subsequent plan changes for these areas (subject to outcomes of masterplanning). This work programme is shown below in Figure 3.

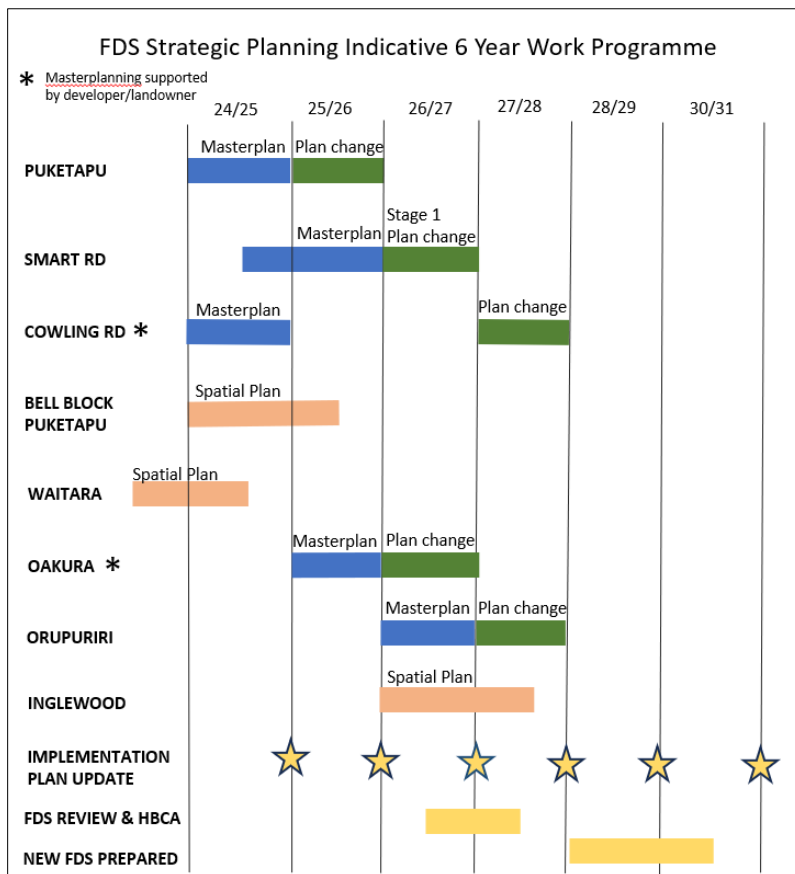


Figure 3: Strategic Planning Indicative work programme.

111. This programme includes some additional shifting in the timing of undertaking master planning of certain FUZ areas, including bringing forward Oakura South.

National Policy Statement on Highly Productive Land

112. Much of the potential additional greenfield opportunity discussed in paragraphs 103-106 is constrained by the presence of highly productive land and the requirements of the National Policy Statement on Highly Productive Land (NPS-HPL), which Councils *must* give effect to. This does not mean future urban development of that area is now inappropriate under the NPS-HPL. It simply means the relevant urban rezoning provisions (Policy 5 and Clause 3.6) will apply when that land is rezoned. These clauses require assessment of whether:

- The rezoning is required to provide sufficient development capacity;
- There are no other reasonably practicable and feasible options for providing development capacity;
- The benefits of the rezoning outweigh the costs associated with the loss of productive land.

113. In order to meet these requirements, consideration must be given to:

- Greater intensification in existing urban areas;
- Rezoning of land that is not highly productive;
- Rezoning different highly productive land that has a relatively lower productive capacity.

Additional Recommendations

- Update implementation plan to schedule a plan change relating to the activity status for subdivision and development relating to Sites and Areas of Significance to Māori and Archaeological Sites chapters of the PDP, subject to the outcomes of Environment Court Mediation on these topics.
- Adjust timings within the implementation plan to reflect the work programme identified in Figure 3.
- Update section 5.1 of the FDS with updated capacity figures.

3.6 Future Growth Planning

114. Officers recommend a section is included within the FDS outlining how the Councils need to start doing things differently when it comes to providing for growth.
115. The subcommittee heard evidence through the hearing of the need to provide a diversification of offering in relation to house sizes and types. Mr Ingram for the Taranaki Housing Initiative Trust noted the high demand and expected increase in this demand for one- and two-bedroom dwellings. This is reinforced by Property Economics memo on the Retirement Industry (Appendix D), which notes the increasing demand for smaller housing units.
116. The FDS needs to take a long-term view of the supply of housing and the needs of the community over a 30-year horizon. As noted within paragraphs 47-50, the PDP sets up an

enabling framework for allowing these types of developments. Developments such as those set out in Appendix E will be essential in meeting the needs of the community into the future.

117. Several submitters have raised concern with the reliance placed on intensification. As noted within the officers' recommendations, the amount of overall development allocated to intensification equates to around 30-35% per year over the long-term. This is consistent with the numbers of building consents for additional dwellings within existing urban areas over the past few years.
118. As noted within the officers' report, there are significant benefits of providing development through infill of existing urban areas. These include more efficient and low cost provision of infrastructure (given the existing sunk cost), a compact urban form, greater access to amenities and less reliance on private motor vehicles.
119. It is also considered essential that Council start planning greenfield developments differently. The current model for these developments in the district largely provides for the development of whole of structure plan development areas as relatively large-lot residential. It is questionable whether this is an efficient use of land.
120. National Policy direction such as the NPS-HPL have been developed to ensure that New Zealand's most favourable soils for primary production are protected.
121. When master planning structure plan development areas and future urban zones, Council and the development community should consider tools to provide greater densities in appropriate locations. Along with this, consideration should be given to providing more opportunity/direction requiring the provision of different typologies. Examples around New Zealand include such things as requirements within growth areas for maximum allotment sizes, thereby ensuring a diversity in offering and the use of inclusionary zoning to facilitate access to affordable housing.
122. Suggestions of matters to consider moving forward have been included within 2.2 of the FDS under the heading 'doing things differently.'

Additional Recommendations

- Include additional section in the FDS entitled "Future Growth Planning"

Appendices

- Appendix A: Updated summary of recommendations
- Appendix B: Ngāmotu Growth Advisory Panel – draft outline of Proposal
- Appendix C: Review of Hasting District Council Programmes
- Appendix D: New Plymouth Retirement Village Market Economic Memorandum
- Appendix D: Medium Density Developments approved under the Proposed District Plan
- Appendix E: NPDC memorandum on updated capacity figures for the FDS

- Appendix F: Memorandum on updated intensification modelling prepared by Property Economics
- Appendix G: Officer's recommendations on submissions
- Appendix H: Draft FDS with Tracked Changes (including draft FDS Implementation Plan with Tracked

Appendix A – Updated summary of recommendations

Note: Additional Recommendations have been made by officers after the conclusion of the FDS Hearings (as discussed and recommended in the Council Officer’s Report Back). Those additional recommendations are shown in the Table of Officers recommended amendments to FDS below with blue shaded boxes.

Officers recommended amendments to FDS
Section 1: Introduction
Move the outcome statements to the Introduction section.
Section 2: Growth Planning in New Plymouth
Include additional section in the FDS entitled “Future Growth Planning”
Amend to show Council has commenced spatial plans for Waitara and Bell Block and intends to commence a spatial plan for Inglewood commencing in 2026.
Explain how the spatial plans will be developed and that it will be an input for both residential and business capacity. The outcomes of the spatial plans will inform the next FDS.
Section 3.3: Planning for and Provision of Infrastructure
Amend the first paragraph to include reference to waste management infrastructure and services.
Amend to insert wording agreed between Powerco, Transpower and the Councils.
Section 3.5: Climate Change
Amend to insert wording agreed between Powerco, Transpower and the Councils.
Section 4.2: Pre-draft Consultation
Amend to reflect the Ministry of Education’s focus on supporting iwi/hapū/whānau educational aspirations, providing this is accepted by iwi and hapū.
Section 4.3: Outcomes for the FDS
Insert a new outcome statement on Collaboration as follows: <u>The Councils and tangata whenua work responsively with the development community and support them to deliver plan-enabled capacity.</u>
Amend the Collaboration outcome statement as follows: <u>The Councils and tangata whenua work responsively with the development community and support appropriate development the delivery of plan-enabled capacity.</u>
Insert a new outcome statement on Health, Safety and Equity as follows: <u>Urban development and housing supports equitable health and wellbeing outcomes for the diverse needs of all residents.</u>
Amend the outcome statement on Capacity as follows: There is sufficient <u>development</u> capacity available to meet the short, medium and long-term housing and business demands of the district.
Amend the outcome statement on Infrastructure as follows: <u>New and existing infrastructure to support growth is planned, funded and delivered in an efficient and integrated manner to maximise investment to integrate with growth and existing infrastructure is used efficiently to support growth.</u>

Officers recommended amendments to FDS
Amend the outcome statement on Choice as follows: A variety of housing types, sizes and tenures, including papakāinga and other rohe-based housing responses and strategies, are available across the district in quality living environments to meet the community's diverse cultural, social and economic housing and well-being needs.
Amend the outcome statement on Tangata Whenua as follows: <u>Partnership with</u> Tangata Whenua <u>Partnership between Councils and tangata whenua provides for u</u> Urban development and <u>growth, and protection and preservation of form recognises and provides for</u> the relationship of <u>tangata whenua</u> with their culture, traditions, ancestral lands, <u>waterbodies, sites,</u> areas and landscapes and other <u>taonga</u> of significance <u>within their rohe.</u>
Reorder the outcome statements into alphabetical order.
Move the outcome statements to the Introduction section.
Section 4.5: Spatial Scenarios
Retain Scenario 3 – Balanced Focus.
Section 6: Implementation
Include a section titled 'Planning Advisory Group' and outline the establishment, anticipated make-up and purpose of the group, including ongoing maintenance.
Include tangata whenua as subject matter experts in the Planning Advisory Group.
Remove Figure 14 and amend section 6 text to direct readers to a separate standalone document.
Develop a more detailed standalone FDS Implementation Plan, aligned with decisions on the LTP.
Review, update and amend the Implementation Plan annually, in collaboration with the Planning Advisory Group, to align with LTP and annual plan processes, and to reflect any PDP plan changes.
Amend the FDS implementation plan to include the Urenui/Onaero wastewater treatment plant as a project over the years 2024-2031 (including to investigate further areas possible intensification, including Māori Purpose zoned land, in Urenui as part of opportunities from a wastewater treatment plant)
Amend the Implementation Plan to adjust the timing for undertaking master planning of Smart Road, Frankley Cowling, Oakura South and Oropuriri.
Amend implementation plan to include consideration of additional land within Puketapu Structure Plan Development Area
Add spatial plans for Bell Block, Waitara and Inglewood to Implementation plan
Include an 'Assessment of rezoning of 108 Henwood Road, New Plymouth' as part of the Bell Block spatial plan.
Update implementation plan with new topic 'Council Processes' and add project to schedule an omnibus plan change relating to urban development, and a plan change relating to the activity status for subdivision and development relating to Sites and Areas of Significance to Māori and Archaeological Sites chapters of the PDP, subject to the outcomes of Environment Court Mediation on these topics.
Add Tangata Whenua section to the implementation plan with the following project work: 'Māori growth planning project' and 'Ongoing communication with Ngā Kaitiaki Roopū'.
Include 'investigation into a retirement village proposal' as part of the Feasibility work on the Oakura FUZ in the implementation plan
Adjust timings within the implementation plan to reflect the work programme identified in figure x.
New Sections
Add a section setting out how the Councils will assess and monitor capacity. This should outline the principles for interpreting plan-enabled, feasible and reasonably expected to be realised development capacity.
Add key transport interventions from the implementation plan into the body of the FDS.

Recommended amendments to FDS Technical Document
Section 5.3: Infrastructure Planning
Amend to insert wording agreed between Powerco, Transpower and the Councils.
Appendix 2: Maps Showing District Wide Constraints
Consider at the hearing whether the inclusion of maps shown in Appendix 2 should be included in the FDS itself. If so, add the maps in Appendix 2 to section 4.4 of the FDS with commentary around how the constraints shape growth and infrastructure.
Amend as agreed between Powerco, Transpower and the Councils.

Recommended amendments to Implementation Plan*
Add a Spatial Planning section which outlines tasks and timelines for Waitara, Bell Block and Inglewood, including the provision and type of industrially and commercially zoned land in relation to new housing areas and the land transport system.
Investigations are made as to whether there is ability to provide greater nuance to plan provisions to ensure residential development is both “plan-enabled” but also able to be developed within existing urban areas.
Investigate the provision and type of LFR zoned land in the New Plymouth District and consider updating the FDS Implementation Plan and PDP via a plan change to accommodate any shortfall and change in provisions.
Add a project around Māori growth planning.
Include as ongoing actions: <ul style="list-style-type: none"> • Continue regular meetings between Councils and the Ngā Kaitiaki Roopū. • Continue meeting regularly with the Technical Professional Group and Developers Forum. • Establishment and ongoing maintenance of a Planning Advisory Group. • Development of a PDP Implementation Plan to proactively assist change management and to achieve the outcome sought by the PDP.
Continue working collaboratively across all councils within Taranaki.
Continue to resolve appeals on the PDP as quickly as possible so plan users only need to consider one district plan.
In collaboration with the Planning Advisory Group, instigate a plan change to finetune the PDP and reduce duplication, inefficiencies and/or pinch points that are creating challenges for the provision of housing and development.
Continual monitoring of PDP effectiveness with a view to undertake a rolling schedule of plan changes to resolve identified issues impacting on growth.
Consider the development of an Intensification Action Plan.
Consideration of incentives to enable development, such as revision of development contribution policy and consent fees for multi-unit developments.
Through the Ngā Kaitiaki Roopū, investigate accelerated structure planning, future urban planning and papakāinga in partnership with iwi and / or hapū.
Explore financial options such as cost sharing and alignment with LTP to invest in better understanding of ground conditions and other constraints at the time of structure planning and rezoning.
Investigate options for additional FUZ/Greenfield sites.
Investigate additional opportunities for residential intensification.

Recommended amendments to Implementation Plan*
<p>Revise feasibility study and plan change timelines for Puketapu Structure Plan Development Area:</p> <ul style="list-style-type: none"> • Undertake further investigations from July 2024 to add the portion of the Johnson’s land on Airport Drive (as highlighted in yellow in Figure 5) to the Puketapu Structure Plan Development Area.
<p>Revise feasibility study and plan change timelines for FUZ:</p> <ul style="list-style-type: none"> • Bring forward the scoping of the feasibility/planning for the Smart Road FUZ to 2024/2025 financial year. • Undertake a feasibility study in the 2026/2027 financial year in conjunction with NZTA, landowners and developers to review the most appropriate zoning for the Oropuriri FUZ. • Bring forward the feasibility study for the Frankley/Cowling FUZ to commence in July 2024, noting that the landowner at 187 Cowling Road will contribute to the cost of this work. This feasibility study will also investigate the inclusion of 213 Cowling Road and the portion of 187 Cowling Road covered by Westown Agriculture site. • Bring forward the feasibility study for Oakura South to commence in 2025-2026
<p>Investigate the rezoning of land, shown as Carrington South, to either RLZ or GRZ in 2028/2029 financial year.</p>
<p>Consider the rezoning of 108 Henwood Road, New Plymouth as part of the Bell Block spatial plan.</p>
<p>Work with tangata whenua to explore opportunities to develop guidance notes and other documents that provide support and clarity on process and scope issues.</p>

*This Implementation Plan does not form part of the FDS but was included within the FDS because it was considered to provide helpful information for the community. The amendments suggested by submitters will be taken into account when developing the Implementation Plan, once the FDS is finalised. The Implementation Plan is a standalone document, which is reviewed annually.

Appendix B - Ngāmotu Growth Advisory Panel

Ngāmotu Growth Advisory Panel – *draft outline of Proposal*

The Ngāmotu growth advisory panel (NGAP) provides input into New Plymouth District Council's (Council's) strategic planning for growth and development within the District and partners with Council to ensure high quality data and expertise in our planning for growth across the District.

The panel allows for issues to be raised early in the planning process to ensure a robust approach to support the provision of growth within the District through best practice advice from interdisciplinary subject matter experts with experience in the District. The panel adds value to Council's planning processes including (but not limited to):

- HBCA
- Development Contributions Policy
- Structure Planning
- Spatial Planning
- Infrastructure scheduling
- Future Development Strategy and annually reviewed Implementation Plan
- Proposed District Plan maintenance and implementation

Role of the panel

The NGAP plays a key role in improving the quality of planning for growth and development across the District. It provides an opportunity for engagement with and between the development sector, iwi/hapu and Council officers to identify opportunities for urban and other development.

The role of the panel is to:

- provide independent growth and development advice to identify significant future development opportunities;
- to work in partnership with Council to provide pre-consultation advice to inform growth and development work;
- provide peer review and feedback on Council's documents and modelling;
- to co-create as appropriate Council's modelling and data information; and
- provide advice to Council on the current state of play in the development sector to help guide future planning work programs.
- assist Council with ongoing monitoring of planning provisions to identify efficiency opportunities.

The panel is an independent advisory body and does not have statutory decision-making powers.

Council's strategic planning work will include recommendations from the panel. The delegated council officers will consider these recommendations in development of Council growth and development documents.

The Council will seek expressions of interest for Panellist nominations. NGAP members come from a range of organisations with respect to their relevant areas of expertise, such as:

- New Zealand Institute of Architects (NZIA);
- Te Kōkiringa Taumata New Zealand Planning Institute (NZPI);
- Property Council of New Zealand (PCNZ);
- Surveying and Spatial New Zealand Tātai Whenua (SSNZ); and
- Experienced New Plymouth District Developers.

Expressions of Interest will require a one-page CV. Nominations will be discussed, and final Panel members agreed by Council's Te Ranga Urungi Executive Leadership.

The panel is supported by Council officers, who liaise and involve as appropriate other local, regional and national government agencies and stakeholders/ partners in strategic growth planning, including tangata whenua.

Membership of the panel

Panel members are professionals with specialist skills in the areas of urban design, architecture, planning, property, surveying, and Te Ao Māori planning.

Panellists are selected for their individual qualifications and experience rather than as representatives of their professional firms.

They are expected to be recognised leaders in their industry with a passion and dedication for contributing to better growth outcomes for Ngamotu New Plymouth.

All panel members are sourced through nominations and appointed by the Council Executive.

Membership timeframe - TBC

Size of the group - TBC

All Panel members are required to sign a Confidentiality Agreement, which acknowledges that they will respect the confidential nature of the information presented to them.

All panel members are required to declare if they have a conflict of interest regarding an issue being considered.

Provision is made for independent experts from other professions to attend Panel meetings to provide expert advice where there are complex or significant issues relating to areas outside of the Panel's expertise.

Panel member duties

Attend between approximately four to ten panel sessions per year depending on demand based on the strategic planning work Council is undertaking.

Provide expert input and share information to help inform high quality data and planning outcomes.

The panel would be remunerated with an honorarium.

Appendix C: Review of Hastings District Council programmes

<p>Hastings residential intensification design guide 2020 – Infill, Comprehensive & Mixed use Development - https://www.hastingsdc.govt.nz/assets/Document-Library/Hastings-Residential-Intensification-Design-Guide/Hastings-Residential-Intensification-Design-Guide.pdf</p>
<ul style="list-style-type: none"> • They aspire to create thoughtfully planned and environmentally friendly housing projects that foster community cohesion, optimize land usage, and safeguard our productive land for future generations. • Their aim is to provide guidance, ideas, and opportunities for achieving high-quality, dense residential development for projects involving single or multiple sites and houses. This Design Guide complements the Hastings District Plan, fostering good design practices and enhancing the quality and appeal of residential development. • They employ principles of residential design, provide project guides and developer tips, offer a design checklist, and present a set of assessment criteria for residential development. • A detailed list of development typologies for: <ul style="list-style-type: none"> ○ supplementary dwellings, ○ infill subdivision (+1-2 lots), ○ comprehensive residential development (3+ dwellings), ○ greenfield comprehensive residential development (maximise yield), ○ residential development in special character areas ○ inner city housing ○ mixed use ○ co-housing and retirement villages • In pursuit of this goal, the Council has embraced a Medium Density Strategy advocating for increased development density. This strategy delineates urban zones suitable for higher intensity development, as outlined in the District Plan. These areas are designated for intensified housing density, encompassing both newly zoned regions (greenfield) and existing urban areas (intensification). • Medium Density Housing Strategy and Implementation Plan 2014 - https://www.hastingsdc.govt.nz/assets/Uploads/Medium-Density-Strategy-Review.pdf
<p>Plan change 5 - https://www.hastingsdc.govt.nz/hastings/projects/plan-change-5-right-homes-right-place/</p>
<ul style="list-style-type: none"> • In MDRZ landowners and developers will be able to apply for Council approval (resource consent) to build homes of up to three storeys high without any public notification. • More choice on existing land for housing • Design elements to provide for different housing typologies • Compact and connected • Useful background information on their medium density development in Hastings. <p>Introduction report for Plan Change 5 - https://www.hastingsdc.govt.nz/assets/Document-Library/Plans/Plan-Change-5-submissions/Hearing-of-Submissions-on-Plan-Change-5/Introduction.PDF</p>

<p>Constraints and infrastructure report - https://www.hastingsdc.govt.nz/assets/Document-Library/Reports/Regional-Growth-Strategy-Infrastructure-Constraints-Report.PDF</p>
<ul style="list-style-type: none"> • Supports Plan Change 5 • The purpose of the Infrastructure Constraints Report is to analyse the current physical capacity of infrastructure that supports the Hastings urban area including Havelock North and Flaxmere. It does not set out to provide solutions to the constraints identified. • Topics covered by this work are drinking water, wastewater, stormwater, transport, parks and open spaces.
<p>Hastings Medium and Long Term Housing Strategy - https://www.hastingsdc.govt.nz/assets/Document-Library/Strategies/Hastings-Medium-and-Long-Term-Housing-Strategy/Hastings-Medium-and-Long-Term-Housing-Strategy.pdf</p>
<ul style="list-style-type: none"> • Aim of the strategy is every whānau and every household has access to a safe, stable, healthy, affordable home in a thriving resilient community with access to education, employment and amenities. • A Programme of Work was developed to deliver: <ul style="list-style-type: none"> ○ Social and affordable house ownership and rental availability ○ Affordable market housing ○ Māori housing ○ Senior housing ○ Seasonal worker housing ○ Skills training and employment creation • They employ a detailed action plan of what outcomes they are trying to address, who leads the actions and who else will be involved, as well as a timeline (similar to an FDS implementation plan). • Utilise statistical data to inform the demand aspect of different types of developments (similar to the HBA).
<p>Heretaunga Plains Urban Development Strategy - https://www.hpuds.co.nz/assets/Document-Library/Strategies/2017-Heretaunga-Plains-Urban-Development-Strategy-incl-Maps-AUG17.pdf</p>
<ul style="list-style-type: none"> • This strategy will be replaced by the Hastings and Napier Future Development Strategy in the future • The Heretaunga Plains Urban Development Strategy is the result of a collaborative approach by the Hastings District Council, Napier City Council and Hawke's Bay Regional Council towards managing urban growth on the Plains from 2015 to 2045. The joint Strategy was first adopted in 2010, then a reviewed version re-adopted by the three councils in early 2017 • The original HPUDS 2010 brought together the separate urban development strategies that both Hastings and Napier had in place from the 1990's through to 2015. The revised HPUDS2017 updates the original joint strategy to accommodate and adapt to new growth projects, demographic changes and market drivers for housing and business land needs projected over the next 30 years. • The Strategy is based on a preferred settlement pattern of 'compact design' for the Heretaunga Plains. In particular, this recognises the community's preference to maintain the versatile land of the Heretaunga Plains for production purposes.

- The direction for growth through to 2045 relies on Napier and Hastings having defined growth areas and urban limits, with a need to balance increased intensification and higher densities close to the commercial nodes and higher amenity areas in the districts, against the provision of lifestyle choice.
- Defined growth areas are a key element of the settlement pattern. They are more efficient and cost effective from an infrastructure and servicing point of view, and ensure land use and infrastructure can be co-ordinated, development well planned, and growth on the versatile land of the Heretaunga Plains avoided as much as possible.
- Significant levels of increased density and intensification will occur under the compact development scenario. There are issues relating to public acceptance of moving quickly to more-dense living environments and in some cases potentially higher costs of funding intensification of existing areas and for these reasons a slow transition from the current approach through to a full compact settlement scenario has been adopted.

Iona development - <https://www.hastingsdc.govt.nz/services/district-plan/changes/iona-residential-rezoning/>

- The Iona area of Havelock North has been identified for residential growth since 1993.
- A request to rezone the land at Iona was made to Council as part of public submissions on the Proposed District Plan back in 2014, which at the time was rejected. The Council's decision was appealed to the Environment Court in October 2015.
- Following the appeal, approval was given by the Environment Court to try and mediate the appeal through the formation of a working group. The working group was made up of local residents who lodged an interest in the appeal, Council staff, consultants and representatives from the appellant's family.
- Facilitated by a landscape architect, the working group established a set of community focused outcomes and prepared a draft Structure Plan to guide the rezoning. Community consultation on the draft Structure Plan then occurred to refine it and inform the District Plan variation that followed. An application was then made to the Environment Minister for this land to be rezoned under a Streamlined Planning Process, which was approved in February 2018.
- The District Plan variation (Variation 4) to rezone this land was then notified soon after, submissions received and considered by independent commissioners who then made recommendations to the Environment Minister. The Environment Minister then made the final decision on the rezoning, which came into effect on 19 September 2018.

The structure plan

- The structure plan is more detailed than that ever produced previously, given the unique landscape within which this area sits, and the desire to retain many of the existing landscape features that the local community identify with and value. Below is an outline of some of the elements of the Structure Plan. The full wording of the District Plan provisions can be found in Eplan.
- Iona Special Character Zone – adoption of the three distinct neighbourhood areas - Bull Hill, Iona Plateau and Iona Terraces each with different District Plan provisions acknowledging their distinct features and to manage environmental effects.
- Roading, Walkways and Cycleways – some roads are indicative and others fixed to assist manage how the neighbourhoods are developed and promote good connections. Central to the Plateau and Terraces is the spine road, which has been positioned in the saddle of

the central ridge to reduce visibility. This road is to retain a more rural feel and treatment.

- Public Open Space – two new reserves are intended, Bull Hill Reserve within the Iona triangle which is to include a playground and the other across the road within the hill area. Walking loop circuits through the reserves are intended to further enhance recreational opportunities.
- Infrastructure – existing ponds will be used along with additional land set aside for stormwater management and detention to ensure stormwater neutrality is achieved. Central water and wastewater are also shown, including a new wastewater pump station on Iona Road within a reserve area.
- Link to Hastings District Plan – Havelock North Strategic Management Area (<https://eplan.hdc.govt.nz/eplan/rules/0/57/0/0/0/1213>).
- Report to the minister on Variation 4 to the Hastings District Council Proposed Plan - <https://www.hastingsdc.govt.nz/assets/Document-Library/Iona/A.-Variation-4-Iona-Rezoning-to-HDC-Proposed-District-Plan-Recommendations-to-the-Minister-Final-310718.pdf>

PROPERTY ECONOMICS



NEW PLYMOUTH

RETIREMENT VILLAGE MARKET

ECONOMIC MEMORANDUM

Client: New Plymouth District Council

Project No: 52399

Date: May 2024

52399.2

7 May 2024

ECONOMIC MEMORANDUM

To: New Plymouth District Council
c/- Jacob Stenner
Growth and Services Supervisor
Email: Jacob.Stenner@npdc.govt.nz

RE: ECONOMIC OVERVIEW OF NEW PLYMOUTH RETIREMENT VILLAGE MARKET

INTRODUCTION

Property Economics has been commissioned by New Plymouth District Council (**NPDC**) to undertake a high-level economic overview of the retirement residential market in New Plymouth. Specifically, this economic memorandum assesses population projections for the district, the historic issuance of retirement unit building consents, and the projected demand for additional retirement units in the district across short-, medium-, and long-term horizons.

The findings of this economic overview will assist in quantifying the demand for smaller dwelling typologies (1-2 bedrooms in particular) within the district to contextualise the market sector of highest demand relative to other age cohorts.

NEW PLYMOUTH POPULATION PROJECTIONS BY AGE GROUP

Figure 1 on the following page illustrates the present (2024) and projected population bases for New Plymouth District categorised by age groups. These projections span from 2024 to 2054 and are derived from the Long Term Plan 2021 (**LTP**), which adopted the Infometrics Medium growth scenario as its basis.

New Plymouth currently has a population base of slightly under 89,000 individuals in 2024, with an estimated average household size of approximately 2.48. Among this existing population, the predominant demographic group comprises Babies, Kids, Teenagers, and Young Adults (0-24 years), constituting approximately 31% of the total population. Additionally, nearly 17,700 individuals are retirees / aged 65+ years, representing around 20% of the overall population.

Looking forward, the population of New Plymouth is projected to reach approximately 110,450 usual residents by 2054 under the Medium growth scenario, indicating a projected increase of around 21,450 people or roughly +24% over the next three decades. Consequently, the average household size in the district is expected to decline from 2.48 in 2024 to 2.42 in 2054.

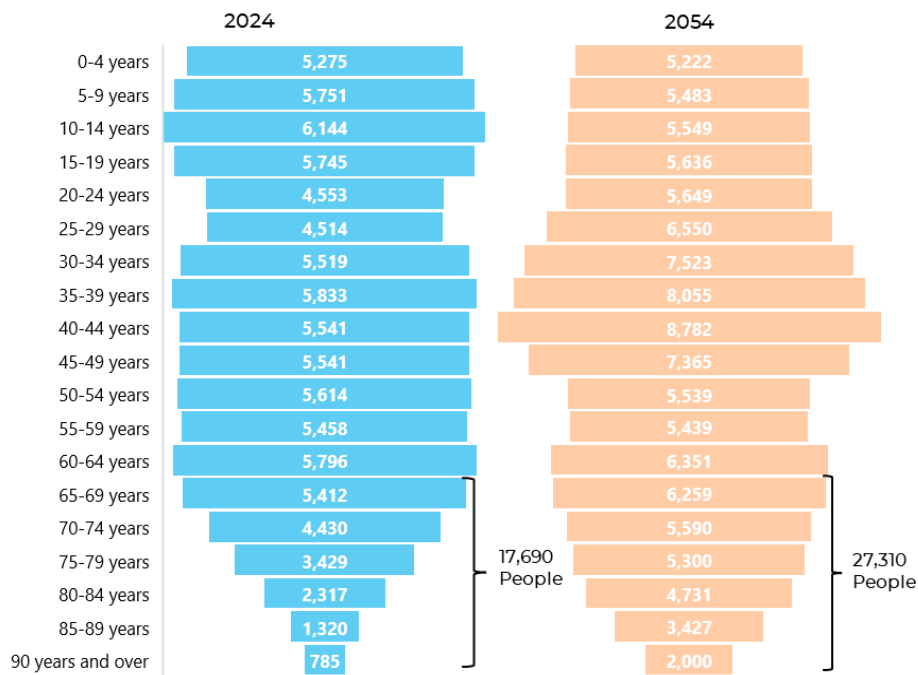
Specifically, the projected growth in retirees (65+ years) amounts to around 9,620 individuals over the next 30 years, constituting a significant portion (45%) of the district's total population growth. Consequently, the projected population aged 65 years and above is expected to reach around 27,310 people by 2054. This equates to a **+54%** expansion from the current population base of the 65+ age group.

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In contrast, the demographic contribution of Baby, Kids, Teenage, and Young Adults (0-24 years) is anticipated to decrease around **-6%** as a proportion of total population by 2054 from 31% in 2024 to just under 25% in 2054. These projected shifts reflect the expected ongoing transition as a result of the 'baby boomer' age cohorts moving through the demographic chronology, a trend expected to manifest nationally and internationally.

The elderly / retirees (65+ years) and young professionals (25 - 34 years) represent the most significant age cohorts with small typology preferences (e.g., one or two-bedroom residences). These demographic shifts clearly show a significant proportion of the increasing demand for smaller typologies will come from the 65+ retirement age cohorts over the next 30 years.

FIGURE 1: NEW PLYMOUTH DISTRICT CURRENT (2024) AND FUTURE (2054) POPULATION BY AGE GROUP



Summary	2024	2054	Change
Babies, kids, teenagers, young adult (0-24 years)	30.9%	24.9%	-5.9%
Young professionals (25-44 years)	24.1%	28.0%	3.9%
Middled aged (45-64 years)	25.2%	22.4%	-2.8%
Retirees (65+)	19.9%	24.7%	4.8%

Source: NPDC, Infometrics, Property Economics. Note that the 2054 population figures are based on Medium growth scenarios.

NEW PLYMOUTH RETIREMENT UNIT CONSENTS TREND

Figure 2 on the following page depicts the patterns in retirement unit consents within the district over the past 23 years, utilising residential building consents data sourced from Stats NZ. It shows that in 2021, the total number of retirement unit consents increased to a peak of 123 consents within the

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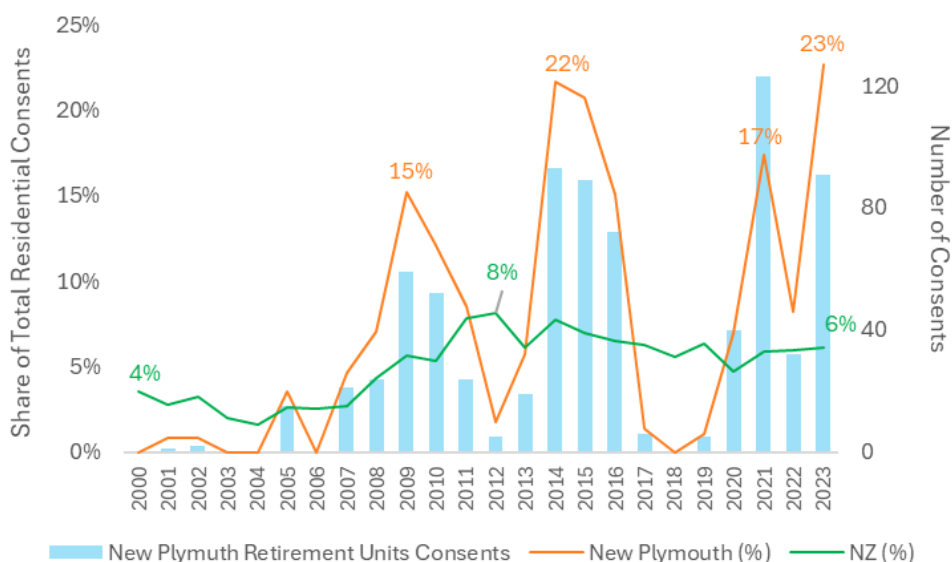
district, marking a level approximately eight times higher than the average observed during the first decade of the 2000s (i.e., an average of 15 consents per year from 2000 to 2010). Consequently, over the past 23 years, the district had an average issuance of around 34 retirement unit consents per annum.

Historically, there was limited interest in retirement units / villages within the district (and the country) due to their limited appeal, offering, amenities and opportunities. As a result, the demand for residential products tailored to the senior population, particularly for retirement living, has largely remained untapped within the district (and nationally).

In the most recent year, 2023, retirement units accounted for a record high of around 23% of the total consents within the district, surpassing the national average by around 17% (which stands at only 6%). This substantial difference reflects not only the increasing diversity in residential preferences within the New Plymouth local market but also a significantly higher demand for retirement units within the district compared to the broader national trend.

Retirement Villages are now focused on providing a higher quality living environment, amenities, lifestyle and continuum of care services as you move through the latter stages of life. This has expanded the market for retired living opportunities.

FIGURE 2: THE CONTRIBUTION OF RETIREMENT UNIT CONSENTS TO TOTAL RESIDENTIAL CONSENTS



Source: Stats NZ, Property Economics

DEMAND FOR RETIREMENT VILLAGE UNITS IN NEW PLYMOUTH

Of particular significance to the retirement village and aged care sector is the growing population of individuals aged 75 years and above, which will continue to drive demand for retirement unit

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accommodation. According to JLL's recent research¹, there is a noticeable gap in the penetration rates of retirement village living between New Plymouth and the national average. In New Plymouth, approximately 12% of individuals aged 75 and above currently reside in retirement villages, while the national average stands at 14%.

The lower penetration rate in New Plymouth suggests that potential retirement market demand remains untapped or underserved, presenting opportunities for investment and expansion by developers and operators in the district. Addressing the factors contributing to the lower penetration rate, such as improving accessibility, enhancing awareness, or addressing regulatory barriers, could help stimulate growth in the local retirement village market and better meet the needs of seniors in New Plymouth.

For this forecast, Property Economics has assumed (like anticipated across NZ) an increasing acceptance of retirement living options within the district, incorporating a minor improvement from the existing 12% to 13% over the short term (3 years), to 15% over the medium term (10 years) followed by a further increase to 18% over the long term (30 years).

In addition to the 75+ age group, this forecast considers the demand from the 65-75 age group, as retirement villages typically have an age entry criterion of 70+ years, with some allowing entry as young as 65 years. As such, this forecast has assumed a penetration rate of 2% for the 65-75 age group in the short term, with the potential to increase to 3% in the medium term and 4% in the long term.

With these conservative assumptions in mind, Table 1 on the following page presents the projected population growth for these age categories and the resulting estimated demand for retirement village units in the district over the short, medium, and long terms, under the LTP – Infometrics Medium growth scenario. Additionally, the Infometrics High projection is considered to provide an alternative growth picture if growth occurred at this higher trajectory.

As previously mentioned, the district's 65+ age group is anticipated to experience a net increase of about 9,620 individuals above the current population base. By applying penetration ratios ranging from 12% to 18% for the 75+ age group and 2% to 4% for the 65 - 75 age group, along with JLL's estimated average occupancy rate of 1.3 residents per retirement unit, it is projected that the district will require an additional 100 retirement units by 2027, 420 retirement units by 2034, and 1,120 retirement units by 2054 under the Medium growth scenario.

Under the higher growth scenario, the district would require an additional 120 retirement units by 2027, 510 retirement units by 2034, and 1,470 retirement units by 2054. If market penetration is higher than anticipated, the identified demand figures would increase commensurately.

Note that these projections do not account for the existing latent demand for retirement village units within the district and are solely based on the anticipated growth in the population aged 65 years and above. Any latent demand for retirement village units within the district would elevate the demand

¹ *New Zealand Retirement Villages and Aged Care (August 2023) - JLL*

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for retirement units in New Plymouth to a higher level. To bring New Plymouth up to the national average, i.e. to 14%, an additional 120 units would of be required.

TABLE 1: NEW PLYMOUTH DISTRICT RETIREMENT UNIT FUTURE DEMAND FORECASTS

Infometrics - Meidum Growth Projection	Base Year 2024	Short-term 2024-27	Medium-term 2024-34	Long-term 2024-54
75+ Age Group Total Population	7,850	8,660	11,230	15,460
75+ Age Group Population Growth	-	810	3,380	7,610
75+ Age Group Retirement Village Residents Growth	-	110	510	1,370
65 - 75 Age Group Total Population	9,840	10,650	11,190	11,850
65 - 75 Age Group Population Growth	-	810	1,350	2,010
65 - 75 Age Group Retirement Village Residents Growth	-	20	40	80
65+ Age Group Total Population	17,690	19,310	22,420	27,310
65+ Age Group Total Population Growth	-	1,620	4,730	9,620
65+ Age Group Retirement Village Residents Growth	-	130	550	1,450
Additional Retirement Village Units Demanded	-	100	420	1,120

Infometrics - High Growth Projection	Base Year 2024	Short-term 2024-27	Medium-term 2024-34	Long-term 2024-54
75+ Age Group Total Population	7,850	8,820	11,870	17,630
75+ Age Group Population Growth	-	970	4,020	9,780
75+ Age Group Retirement Village Residents Growth	-	130	600	1,760
65 - 75 Age Group Total Population	9,840	10,850	11,830	13,510
65 - 75 Age Group Population Growth	-	1,010	1,990	3,670
65 - 75 Age Group Retirement Village Residents Growth	-	20	60	150
65+ Age Group Total Population	17,690	19,670	23,700	31,140
65+ Age Group Total Population Growth	-	1,980	6,010	13,450
65+ Age Group Retirement Village Residents Growth	-	150	660	1,910
Additional Retirement Village Units Demanded	-	120	510	1,470

Source: Infometrics, NPDC, JLL, Property Economics

In Property Economics' view, the insufficient supply of residential properties in the New Plymouth market can be expected to exacerbate the strain on an already tight housing market. This situation could lead to individuals aged 65+ years finding themselves in housing arrangements that do not match their preferences (primarily due to the scarcity of alternative housing options), posing risks to their economic and social wellbeing.

As such, measures aimed at bolstering the supply of suitable housing options for individuals aged 65+ years in New Plymouth would be beneficial. This could involve incentivising developers to invest in retirement village and aged care facilities to meet the growing demand. Collaborative efforts between NPDC, developers, and community organisations could also help address the housing challenges faced by older residents in the district. Ultimately, a proactive approach focusing on increasing housing options and accessibility for seniors is crucial to ensure their long term economic and social well-being.

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Therefore, the development of new retirement village projects in strategic and efficient locations - such as those close to amenities, services, transportation networks, and infrastructure is important to facilitate the district's demographic transition and meet the evolving residential demands of the community.

If you have any queries, please give me a call.

Kind Regards

Tim Heath



Tim Heath

M: 021 557713

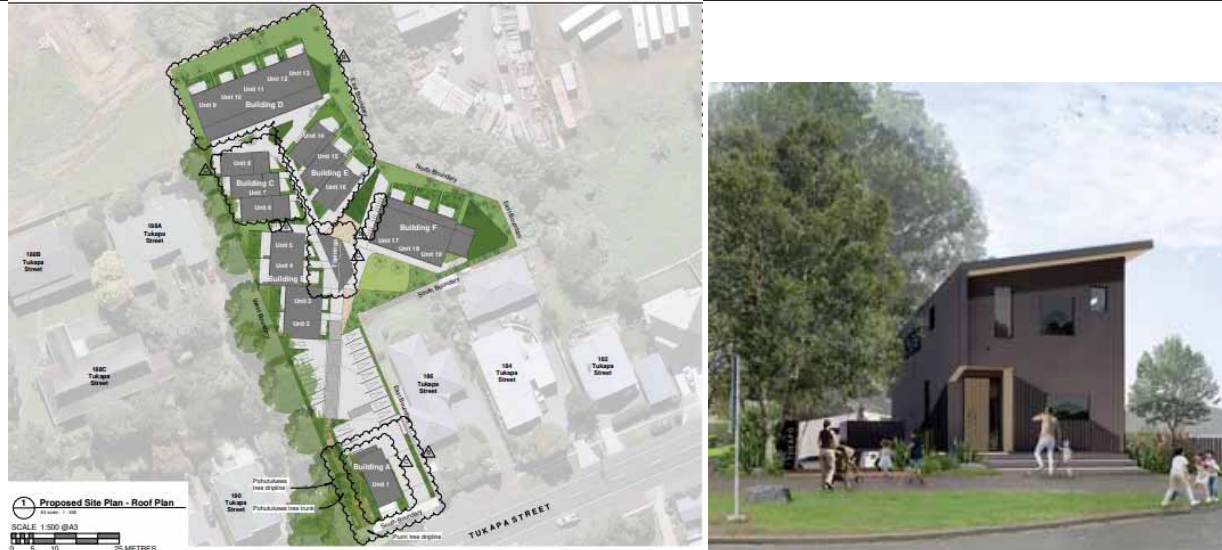
PO: Box 315596, Silverdale 0944, AUCKLAND

E: tim@propertyeconomics.co.nz

www.propertyeconomics.co.nz

Appendix E: Medium Density Development approved under the Proposed District Plan

Consent number / description	SUB24/50038 & LUC24/48446
Application Status:	Subdivision consent granted under PDP
Name of applicant & agent	GJ Gardner Homes Ltd McKinlay Surveyors
Site Address	129 Coronation Avenue WELBOURN, NEW PLYMOUTH
PDP zone	Medium Density Residential Zone
Number of residential units/number of bedrooms in each	8 lot subdivision – 8 townhouses (two detached two-storied buildings each containing 4 two bedroom units). Each unit is approximately 4.25m wide x 10m in length, with a ground floor area of 42m ² and a first-floor area of 40m ² (80m ² total for each unit)
Some images of the buildings (that showcase urban design/visual treatment).	<p>The image block contains several architectural drawings for the G.J. Gardner Homes project. On the left is a site plan showing the layout of the townhouses and surrounding greenery. To the right are two elevation drawings: a north elevation showing a two-story building with a dark roof and a light facade, and an east elevation showing a row of townhouses with gabled roofs and a mix of light and dark exterior finishes. Below these are two sets of technical drawings, one labeled 'G.J. Gardner. HOMES' and another 'CORONATION AVENUE'. At the bottom center is a perspective rendering of the townhouses, showing their modern design with large windows and a dark roofline, set against a clear sky and a paved area.</p>

Consent number / description	LUC23/48151 for 19 two-storied terraced and semi-detached townhouses to be used for Papakāinga housing											
Application Status:	Granted under ODP and PDP											
Name of applicant & agent	Te Atiawa Iwi Holdings LP Laura Buttimore Planning Solari Architects											
Site Address	186A and 188 Tukapa Street.											
PDP zone	General Residential Zone											
Number of residential units/number of bedrooms in each	19 two-storied terraced and semi-detached townhouses to be used for Papakāinga housing. 6 blocks The units' range in size from 79.4m2 to 144m2.											
	<table border="1"> <thead> <tr> <th>Unit Type</th> <th>Number</th> </tr> </thead> <tbody> <tr> <td>2-bedroom</td> <td>2</td> </tr> <tr> <td>3-bedroom</td> <td>12</td> </tr> <tr> <td>4-bedroom</td> <td>5</td> </tr> <tr> <td>Total</td> <td>19</td> </tr> </tbody> </table>		Unit Type	Number	2-bedroom	2	3-bedroom	12	4-bedroom	5	Total	19
Unit Type	Number											
2-bedroom	2											
3-bedroom	12											
4-bedroom	5											
Total	19											
Some images of the buildings (that showcase urban design/visual treatment).	 <p>The image contains two parts. On the left is an aerial 'Proposed Site Plan - Roof Plan' showing the layout of six buildings (A-F) and 19 units. The site is bounded by Tukapa Street to the north and south, and other streets to the east and west. A scale bar indicates 1:500 @ A3. On the right is a 3D architectural rendering of a modern, two-story townhouse with dark cladding and large windows, situated in a landscaped area with trees and a paved walkway.</p>											

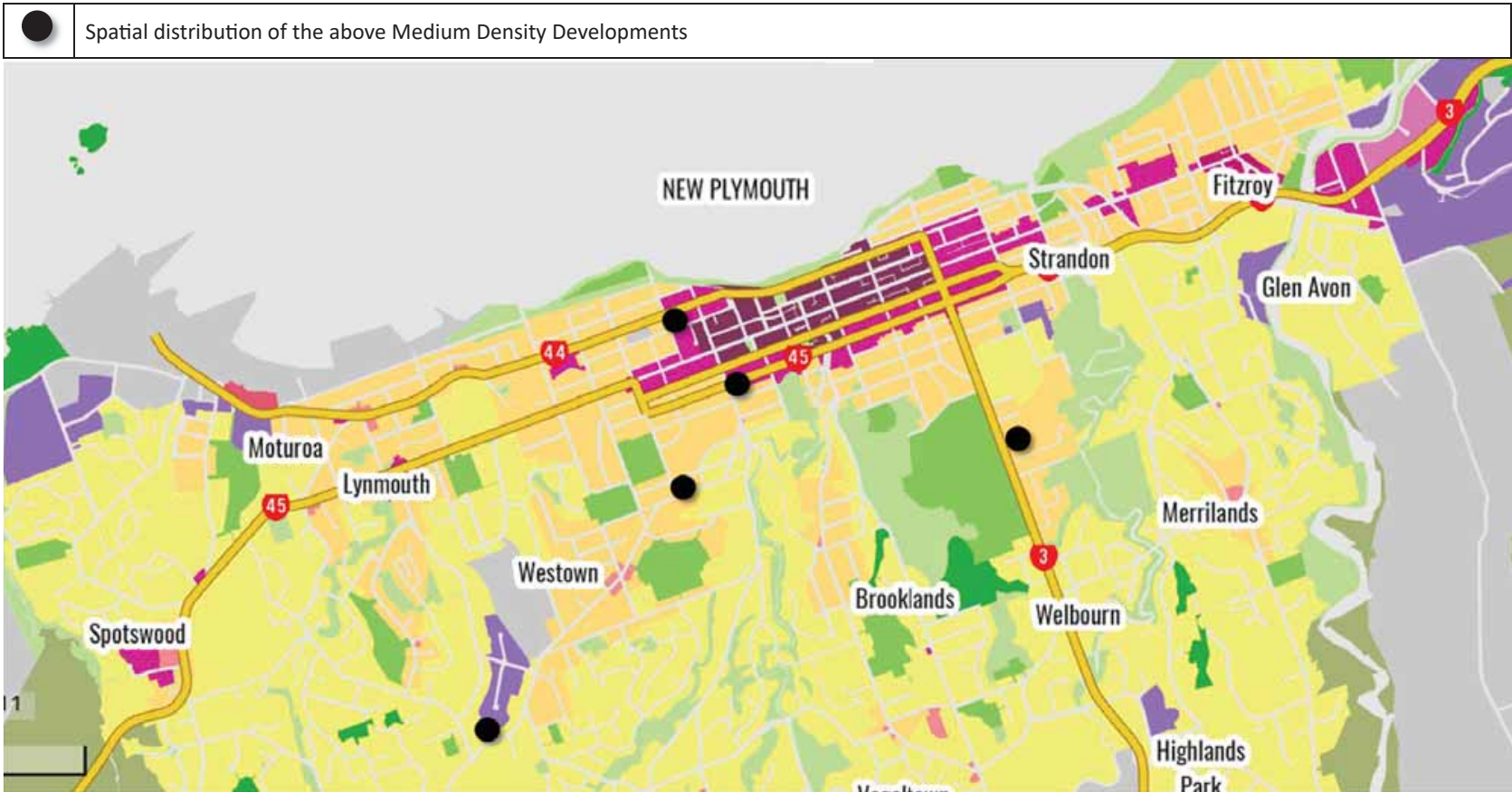
Consent number / description	SUB24/50026 & LUC24/48424 for 14 residential apartment units
Application Status:	Subdivision granted under PDP
Name of applicant & agent	Gibbons Developments Ltd Flint Planning Limited Novak + Middleton (the architect supporting the proposal),
Site Address	55 Dawson Street / 77 Vivian Street
PDP zone	Mixed Use Zone
Number of residential units/number of bedrooms in each	14 one-bedroom apartments. Constructed in a three story building The units range in size from 54.95m ² to 66.07m ²
Some images of the buildings (that showcase urban design/visual treatment).	 <p>The image is an architectural rendering of a modern, three-story residential building. The building features a mix of white and dark green exterior panels. It has multiple balconies with glass railings. In the foreground, there is a white car parked on a paved area, and a person is visible walking. The background shows some greenery and a clear sky.</p>

Consent number / description	SUB24/50028 & LUC24/48425 for 16 one-bedroom residential units at 173 St Aubyn Street, New Plymouth.
Application Status:	lodged
Name of applicant & agent	Stradegy Planning Limited, NZHG 2023 Ltd Design group Stapleton Elliott
Site Address	173 St Aubyn Street, New Plymouth.
PDP zone	Mixed Use Zone - (PREC14 – Mixed Use Living Precinct)
Number of residential units/number of bedrooms in each	16 one-bedroom residential units, constructed in three blocks. 66m2 to 128m2

Some images of the buildings (that showcase urban design/visual treatment).



Consent number and description	SUB24/50020 & LUC22/48356.01 for an 8 lot subdivision
Application Status:	Granted under PDP
Name of applicant & agent	Te Atiawa Iwi Holdings LP Laura Buttimore Planning Prime Designs
Site Address	51 Barrett Street New Plymouth
PDP zone	Medium Density Residential Zone
Number of residential units/number of bedrooms in each	8 lot town house development for whānau housing- 2 and 3 bedroom units Allotment sizes range from 60m2 to 149m2 configured in into two 4-unit blocks
Some images of the buildings (that showcase urban design/visual treatment).	 



Appendix F: Memorandum on updated capacity figures for the FDS – New Plymouth District Council

May 2024

The following are revised details of our expected reasonably expected to be realised capacity for New Plymouth, following the Future Development Strategy (FDS) hearings:

1. Property Economics to re-assess the intensification capacity within our residential and central city zones. Appendix F.
2. The first update involves incorporating the new draft Development Contributions (DC) into our feasibility calculations, a change from the previous HBCA assessment. The addition of these DCs to the SPDA and FUZ areas had minimal impact due to their large greenfield nature. Generally, parcels capable of accommodating over 10 dwellings remain feasible. However, smaller parcels still lack feasibility, aligning with the initial 2024 HBCA assessment.
3. Additionally, we've accounted for infrastructure-ready capacity. Certain parts of New Plymouth face minor constraints, such as short-term challenges over Waimea sewer and stormwater issues in Waitara and Inglewood. This acknowledges that while some areas may not currently meet infrastructure requirements, they are included for medium to long-term development. Plans are in place within the Long-Term Plan (LTP), Infrastructure Strategy (IS), to address these needs and ensure readiness for future development.
4. The most significant notable change is the exclusion of parcels containing Sites of Significance to Māori (SASM) or Archaeological Sites (AS), including a default extent when a mapped extent is not present. Subdividing these sites requires discretionary resource consent application, affecting the potential capacity of undeveloped residential zones, SPDA's and FUZ's. Approximately 1,867 dwellings have been removed from the long-term capacity due to these rules. The following tables examine the difference if the rules were altered to be restricted discretionary instead of the current discretionary status. Maps of the most affected areas are also included to identify parcels excluded from assessment.

Development Capacity Assessment with SASM and AS rules – RD and D Activity

	Development Capacity with SASM and AS	Development Capacity with SASM	Difference
Undeveloped Residential Land	1,955	1,193	-762
Puketapu SPDA	721	481	-240
Frankley/Cowling FUZ	616	408	-208
Area R FUZ	267	181	-86
Oākura South FUZ	430	294	-136
Waitara East FUZ	234	106	-128
Smart Road FUZ	2,739	2,432	-307
		Total	-1,867

Table 1: Development Capacity Assessment with SASM and AS rules – RD and D Activity

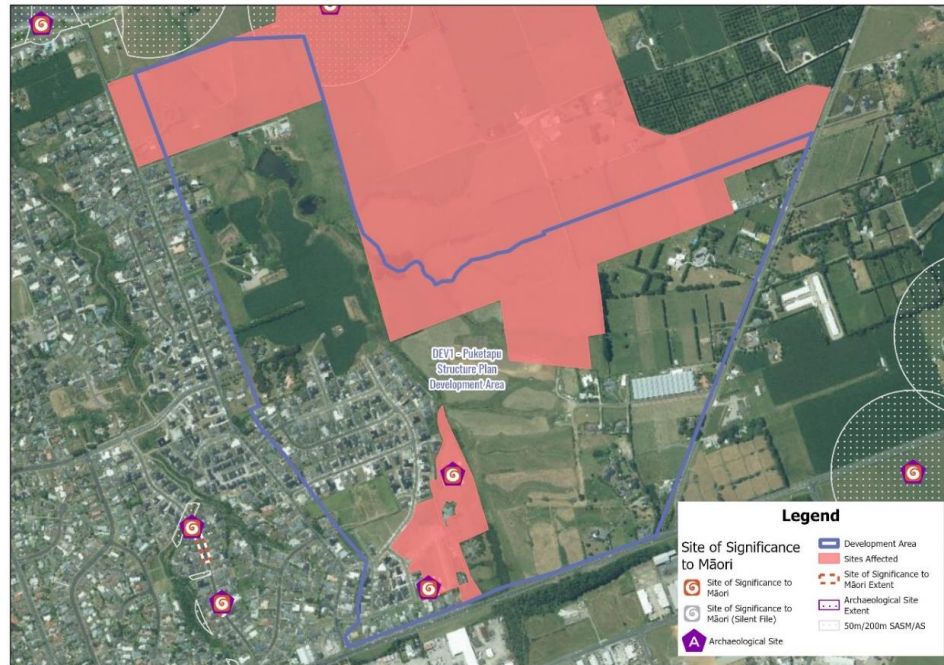


Figure 1: Puketapu Structure Plan Development Area – Parcels Affected by SASM and AS rules.



Figure 2: Future Urban Zones Significantly Affected by SASM and AS rules.

Outcome

The concluding tables are presented below. Despite the adjustments outlined earlier, we maintain sufficient capacity for the short and medium term. However, there is a shortfall in long-term capacity due to compliance with SASM and AS rules applied at a Discretionary activity. This shortfall is estimated to be approximately 1,089 dwellings, exclusively affecting our long-term demand.

SHORT Term (1-3 Years)	Capacity									Demand		
	Plan-enabled	Plan-enabled Capacity with SASM and AS constraints	Infrastructure Ready	Infrastructure Ready with SASM and SA constraints	Feasible	Feasible with SASM and AS constraints	Reasonably Expected to be Realised	Reasonably Expected to be Realised with SASM and AS constraints	Reasonably Expected to be Realised with SASM and AS constraints - 2X Gen Res Dwellings	Demand + 20% Margin	Remaining Capacity	Percentage
Rural Lifestyle	189	92	0	0	0	0	0	0	0	0	0	0%
Intensification District Wide	69,375	66,136	61,571	58,332	9,218	8,606	3,517	3,315	4,540	309	3,006	35%
Inner City development	29,706	24,582	29,706	24,582	4,148	3,557	909	872	872	45	827	5%
Undeveloped Residential	3,102	2,042	1,662	1,036	1,310	732	965	415	415	221	194	25%
Puketapu SPDA	1,038	741	727	519	596	405	505	337	337	143	194	16%
Johnston SPDA	136	136	136	136	136	136	108	108	108	80	28	9%
Patterson SPDA	188	166	188	166	166	166	100	100	100	85	15	10%
Total	103,734	93,895	93,990	84,771	15,574	13,602	6,104	5,147	6,372	883	4,264	100%
Over/Under Supply	102,851	93,012	93,107	83,888	14,691	12,719	5,221	4,264	5,489			

Table 2: Short Term Capacity Assessment and Demand

Future Development Strategy - Reconvened - Decision - Submission Report

MEDIUM Term (1-10 Years)	Capacity								Demand			
	Plan-enabled	Plan-enabled Capacity with SASM and AS constraints	Infrastructure Ready	Infrastructure Ready with SASM and SA constraints	Feasible	Feasible with SASM and AS constraints	Reasonably Expected to be Realised	Reasonably Expected to be Realised with SASM and AS constraints	Reasonably Expected to be Realised with SASM and AS constraints	Demand + 20% Margin	Remaining Capacity	Percentage
Rural Lifestyle	189	92	0	0	0	0	0	0	0	0	0	0%
Intensification District Wide	69,375	66,136	68,779	65,540	9,304	8,692	3,565	3,363	4,619	1,383	1,980	35%
Inner City development	29,706	24,582	29,706	24,582	4,148	3,557	909	872	872	306	566	8%
Undeveloped Residential	3,102	2,042	2,922	1,895	2,362	1,554	1,921	1,164	1,164	1,126	38	28%
Puketapu SPDA	1,038	741	1,038	741	852	578	721	481	481	602	-121	15%
Johnston SPDA	136	136	136	136	136	136	108	108	108	108	0	3%
Patterson SPDA	188	166	188	166	166	166	100	100	100	100	0	3%
Carrington SPDA	303	303	303	303	301	301	244	244	244	240	4	6%
Junction SPDA	140	140	140	140	140	140	88	88	88	88	0	2%
Total	104,177	94,338	103,212	93,503	17,409	15,124	7,656	6,420	7,676	3,953	2,467	100%
Over/Under Supply	100,224	90,385	99,259	89,550	13,456	11,171	3,703	2,467	3,723			

Table 3: Medium Term Capacity Assessment and Demand

Future Development Strategy - Reconvened - Decision - Submission Report

LONG Term (1-30 Years)	Capacity								Reasonably Expected to be Realised with SASM and AS constraints	Demand		
	Plan-enabled	Plan-enabled Capacity with SASM and AS constraints	Infrastructure Ready	Infrastructure Ready with SASM and SA constraints	Feasible	Feasible with SASM and AS constraints	Reasonably Expected to be Realised	Reasonably Expected to be Realised with SASM and AS constraints		Reasonably Expected to be Realised with SASM and AS constraints	Demand + 20% Margin	Remaining Capacity
Rural Lifestyle	189	92	0	0	0	0	0	0	0	0	0	0%
Infill	69,375	66,136	68,779	65,540	9,304	8,692	3,565	3,363	4,619	3,563	-200	32%
Inner City development	29,706	24,582	29,706	24,582	4,148	3,557	909	872	872	907	-35	8%
Undeveloped Residential	3,102	2,042	2,968	1,930	2,408	1,589	1,955	1,193	1,193	1,922	-729	17%
Puketapu SPDA	1,038	741	1,038	741	852	578	721	481	481	720	-239	7%
Johnston SPDA	136	136	136	136	136	136	108	108	108	108	0	1%
Patterson SPDA	188	166	188	166	166	166	100	100	100	100	0	1%
Carrington SPDA	303	303	303	303	301	301	244	244	244	240	4	2%
Junction SPDA	140	140	140	140	140	140	88	88	88	88	0	1%
Junction FUZ	94	94	94	94	88	88	67	67	67	66	1	1%
Frankley/Cowling FUZ	808	808	808	598	685	475	616	408	408	610	-202	6%
Area R FUZ	354	204	354	204	351	201	267	181	181	266	-85	2%
Oakura FUZ	475	335	475	335	469	329	430	294	294	419	-125	4%
Waitara FUZ	269	141	269	141	262	134	234	106	106	232	-126	2%
Smart FUZ	3,313	2,958	3,313	2,958	3,142	2,787	2,739	2,432	2,432	1,785	647	16%
Total	109,490	98,878	108,571	97,868	22,452	19,173	12,043	9,937	11,193	11,026	-1,089	100%
Over/Under Supply	98,464	87,852	97,545	86,842	11,426	8,147	1,017	-1,089	167			

Table 4: Long Term Capacity Assessment and Demand

PROPERTY ECONOMICS



NEW PLYMOUTH

FEASIBLE RESIDENTIAL

SUFFICIENCY MODEL

Client: New Plymouth District Council

Project No: 52399

Date: May 2024



SCHEDULE

Code	Date	Information / Comments	Project Leader
52399	May 2024	Report	Tim Heath / Phil Osborne

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1. INTRODUCTION

Property Economics has been engaged by New Plymouth District Council to undertake a residential capacity assessment to inform their Future Development Strategy. This capacity assessment represents an update of work Property Economics previously undertook to inform the Proposed District Plan.

Specifically, the focus of this assessment includes an update to how the Theoretical Capacity is modelled in order to appropriately consider the effect of several additional constraints. The costs and market variables that feed into the assessment of market feasibility have also been updated to reflect 2024 values.

Property Economics considers that the model relied upon for the Housing and Business Capacity Assessment was appropriate for Council's requirements as a Tier 2 urban environment under the National Policy Statement for Urban Development. However, the updated model is designed to provide Council with a more comprehensive assessment that can be used to address more complex changes to the district plan, and importantly address specific concerns raised by submitters during the Future Development Strategy hearings.

This report provides an overview of key model assumptions and methodology as well as showing the results and discussing the implications for the New Plymouth Future Development Strategy.

1.1. BACKGROUND

In mid-2021, Property Economics was engaged by New Plymouth District Council (NPDC) to undertake an assessment of the commercially feasible residential capacity (supply) of the New Plymouth District. This model was run across both the Operative and Proposed District Plans and was used to inform NPDC's Housing Development Capacity Assessment (HDCA) that was published in June 2021. This model was based on the Theoretical Capacity assessment undertaken by Council. Property Economics then provided updated capacity assessments



during the Proposed District Plan hearing process based on suggested alterations to the zoning extent and provisions.

The residential capacity results published in New Plymouth Council's Housing and Business Capacity assessment were assessed based on the Panel's decisions of the Proposed District Plan and were provided to Council in 2023. In addition, Council has relied upon previous capacity assessments undertaken during the PDP hearing for the capacity within the Commercial Zones.

Council is now undergoing hearings for their Future Development Strategy, a document that ultimately relies upon housing capacity and demand assessments outlined in the HBA. They have received submissions on the capacity assessment suggesting that it did not sufficiently account for the following constraints:

- Earthworks within a 50m buffer of Sites and Areas of Significance to Maori (SASM) and Archaeological Sites (AS) as well as development of a property that overlaps these sites is a Discretionary Activity (i.e. not enabled by the plan).
- The effect of slopes (specifically recommending the removal of any with a slope of 18 degrees or greater).
- The effect of bylaws restricting the construction of buildings across Council infrastructure (e.g. wastewater pipes).
- The additional costs imposed by flood mitigation costs within the Stormwater flooding overlay.

In order to assess the impact of these constraints requires the adoption of a more comprehensive assessment. Specifically, the model used for the previous capacity assessments was predominately based on average land requirements for different typologies and constraints removed sites from development. Building footprint was considered in regard to the requirements as a proportion of land area but not directly modelled geospatially within each site. Consequently, it could not consider how geospatially specific constraints affected capacity. This is important as constraints such as slope and the buffer around SASM's and Archaeological Sites may only affect a portion of the property making their respective impact variable, rather than a binary exclusion of the site.

A fundamental change implemented in this modelling, therefore, is the direct consideration of the potential building footprint. The details of this model methodology is outlined in this report.



1.2. DATA SOURCES

Information and data have been obtained from a variety of credible data sources and publications available to Property Economics including:

- New Plymouth Proposed District Plan, including supporting information and evidence – New Plymouth City Council
- Population, Household and Dwelling Projections – New Plymouth District Council

1.3. GLOSSARY

- **Theoretical Yield / Plan Enabled Capacity** – The total number of properties that could be developed according to the current District Plan provisions within the permitted building envelope, irrelevant of market conditions.
- **Comprehensive Development** – A development option that assumes the removal of all existing buildings for a comprehensive redevelopment of the entire site with less restrictions.
- **Infill Development** - A development option that assumes the existing building is retained, and new residential house(s) are developed on balance of the site (i.e. the backyard).
- **Standalone House** – Single detached dwelling.
- **Terraced** – Dwellings that are attached horizontally to other dwellings but not vertically. This typology is always built to the ground floor (i.e., does not include homes built above retail stores).
- **Apartments** – Dwellings that are attached vertically and potentially horizontally. Usually in multi-storey developments of higher density.
- **Total Yield**- The total number of dwellings developed.

Net Yield – The total number of dwellings constructed net of any existing dwellings removed. For Infill development, the total yield is equal to the net yield, while for Comprehensive development the net yield is equal to the total yield less the existing dwellings.



2. THEORETICAL MODELLING

2.1. OVERVIEW

The purpose of this section is to provide a high-level outline of the methodology and assumptions used to model the Theoretical Residential and Commercial development capacity across New Plymouth City.

2.2. METHODOLOGY

The data is imported into a geospatial mapping software where the buildable area of each site is calculated simultaneously based on the difference between the site area and area which cannot be developed due to the district plan rules (e.g. setback requirements, maximum site coverages) or practical considerations (e.g. areas of high slope).

From this buildable footprint, the floorspace of each subsequent storey is calculated by assuming each storey has a set height and calculating the setbacks required at the highest point of that storey to fit within the prescribed recession planes. These recession planes are calculated from the boundaries between properties which take into account any zone change (e.g., Buildings in the Commercial Zones are only subject to Recession Planes along the residential boundary).

The procedural modelling is designed to assess the potential floorspace under two different development scenarios, Infill (retaining the existing dwelling) and a Comprehensive Redevelopment (where the existing dwelling is removed). The potential dwelling yield is then calculated for upwards of nine different size and typology options. The sizes and assumptions applied to each of the development options are shown in Table 1 below.

TABLE 1: DWELLING TYPOLOGY AND SIZE ASSUMPTIONS

Typology	Dwelling Size (sqm)	Min Floor Size (sqm)	Land Area Min (Sqm)
Small Houses	80-100	100	150
Medium Houses	130-150	150	170
Large Houses	190-210	210	200
Small Units	50-70	40	100
Medium Units	90-110	40	100
Large Units	140-160	70	140
Small Apartments	50-55	50	
Medium Apartments	65-70	65	
Large Apartments	90-95	90	

Source: Property Economics



Outlined in Table 2 are some of the key zone-specific rules. This includes the alternative standards that are enabled as an RD activity within the Medium Density Residential Zone. Although the maximum site coverage of the Medium Density Residential Zone can be exceeded through an RD consent, this has not been modelled. The City Centre contains specific height precincts that modify the height limit ranging from 10m to 30m.

It should also be noted that although the General Residential Zone allows for two dwellings per site as a permitted activity, the baseline model results rely on allowing only one dwelling per site. This is consistent with the assumption utilised for the HBA. An alternative scenario showing the potential capacity if we allow for two dwellings per site is shown in Section 6.

TABLE 2: ZONE SPECIFIC RULES

Zone	Maximum Site Coverage	Minimum Site Size (sqm)	Dwellings Per Site	Height Limit (m)	Recession Plane
Low Density Residential Zone	20%	750	1	11	-
General Residential Zone	40%	400	1 - 2	8	3m + 45°
Medium Density Residential Zone	50%	300	3	11	3m + 45°
Medium Density Residential Zone (RD)	50%	300	-	11	3.6m + 73.3° *
Mixed Use Living	70%	-	-	16	3m + 45° **
City Centre Zone	70%	-	-	10 -30	3m + 45° **
Local Centre Zone	70%	-	-	11	3m + 45° **
Town Centre Zone	70%	-	-	11	3m + 45° **

Source: Property Economics

* MRZ-S4: Buildings within 20m of the site frontage must not exceed a height of 3.6m above ground level at the side boundaries and thereafter must be set back one metre and then 0.3m for every additional metre in height (73.3 degrees) up to 6.9m and then one metre for every additional metre in height (45 degrees).

** Recession Planes are only applied on boundaries that adjoin residential zones (or any other zone for the Mixed Use Zone). The district plan does differ in the required angle based on the direction of the boundary however this has not been modelled with a 45 degree angle assumed as an average.

2.3. KEY ASSUMPTIONS

Some of the key assumptions applied in the model are as follows:

- To avoid unrealistic developments the setback required from existing dwellings for infill development is set to 3m and for all developments the minimum space available for building at ground floor is 7m (1m of which is allowed to overlap with existing house buffer). Above grade, the minimum building dimension is 5m. The minimum floor areas depend on the typology and size and are shown in Table 1 above.
- Standalone and Terraces have a minimum land area requirement (as outlined in Table 1). This requirement is calculated within individual sections of available land where they are otherwise split by an existing house or a constraint (e.g. Wastewater Pipes). For example, if the backyard space is 120 sqm and the front yard space is also 120sqm, the



model would not place any new dwellings on the site even though the total developable area adds up to 240sqm.

- Backyard space requires vehicle access to be available for development. This is defined by a 3m gap between the boundary and the existing dwelling with building smaller than 50sqm (i.e. garages) removed.
- Infill has only been modelled on sites that have no more than three existing dwellings. In testing, it was found that the buildable area on these sites often ended up covering driveways and parking bays for the existing dwellings.
- Although Commercial Zones do not have required setbacks other than adjoining residential boundaries, the model applies a 1m setback to allow for outlook space.
- Each storey is assumed to be an average of 3.5m in height for the purposes of assessing the Height in Relation to Boundary Standards.
- There are two development options within the MRZ to account for the rule MRZ-R32 which enables a more permissive recession plane as an RD activity. While the permitted development scenario is limited to three dwellings per site, the RD development scenario also allows for more than four dwellings per site. The profitability of these two development scenarios is then compared within the feasibility model where the expected realisation of the RD development scenario is reduced relative to the permitted alternative.

2.4. MODELLING OF CONSTRAINTS

The following constraints represents areas where development opportunity has been removed (i.e. is cut out of the buildable footprint):

- **Heritage buildings, structures, and areas.** -
- **Trees of Significance**
- **Significant Natural Areas** -
- **Designations**
- **Hazard Areas (Coastal Flooding, Fault and Coastal Erosion)**
- **Infrastructure Pipe Setbacks** - This constraint is not in the district plan and the actual requirements depends on the depth of the pipes. Although Property Economics note that this constraint is typically not included in capacity models, it has been included in this model to satisfy submitter concerns.
- **50m buffer around Sites and Areas of Significance to Māori and Archaeological Sites** - Within this area earthworks are classified as a Discretionary Activity.
- **Slopes exceeding 18 degrees** - Although there are no district plan rules that control what can be built on sloped areas, there are practical considerations that need to be considered. For the purposes of this assessment, Property Economics has decided to remove from the buildable floorspace area, land that exceeds a 18-degree slope for greater than 4m in diameter.

Additionally, the following sites have been removed from the model:



- **Schools**
- **Recreation and Community sites**
- **Sites that overlay SASM or Archaeological Sites.** – If the site overlaps any part of these areas, development of the entire site becomes a Discretionary Activity and is therefore removed.

In addition the Stormwater Flooding Area is a constraint that does not actually restrict development, but does impose additional mitigation costs to raise the ground level of the house above the expected flood levels. This has been accounted for within the Feasibility model based on the proportional overlap of the buildable area.

2.5. COMMERCIAL LAND-ADJUSTED CAPACITY

Unlike the Residential Zones where residential activities make up the bulk of activity, there is a need to consider other competing activities in Commercial Zones. Commercial Zones are designed to accommodate a range of uses with residential only being enabled above ground in many locations.

The simple approach to modelling this is to apply a proportional split on total floorspace within these zones based on the current and expected future activity split. In all commercial zones except for the Mixed-Use Zone, only 20% of possible capacity is assumed to be residential. For the mixed use zone, we have taken 100% of capacity within the Mixed Use Living Precinct while Living Activities are a Discretionary Activity outside of this precinct (and therefore not enabled).

In addition, residential activities have been removed from sites adjoining the Pedestrian Frontage. Residential activities are not enabled at ground floor although residential apartments could possibly be built above grade as a mixed-use activity. For the purposes of this model, Property Economics has conservatively excluded this capacity potential.

It is important to note that most realisable apartments are in the commercial zones, namely the City Centre Zone. Therefore, the total assessed capacity for apartments is highly sensitive to these commercial-to-residential ratios.

Realistically, the proportion of commercial development capacity utilised for residential purposes will be highly dependent on the relative supply and demand of commercial and residential activities.

Essentially, if the demand for apartments outstrips the demand for commercial and retail, it is likely that the residential proportion of development in commercial zones will exceed the aforementioned 20% proportion, resulting in more apartment capacity delivered. Conversely, the opposite would be true if the density enabled by the District Plan provides for an excess of higher-density dwellings in the residential zone such that demand for residential apartments in the City Centre is reduced.

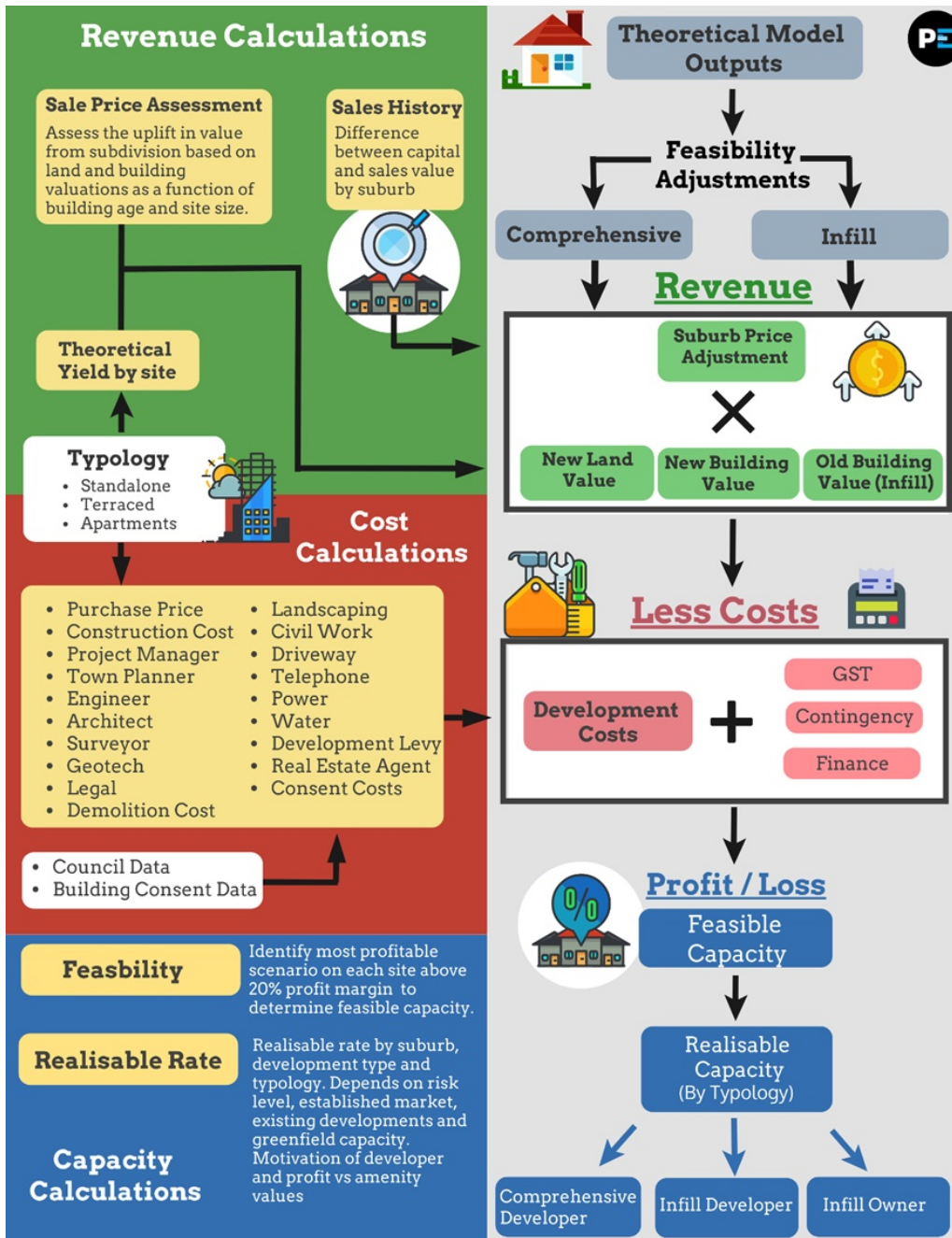
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3. FEASIBLE CAPACITY MODELLING

A high-level overview of the model utilised by Property Economics in determining the feasible residential capacity for New Plymouth City is outlined in the flow chart in Figure 1 below, with detailed descriptions of each stage of the process given following.

FIGURE 1: PROPERTY ECONOMICS RESIDENTIAL FEASIBILITY MODEL OVERVIEW





Using the ratings database provided by New Plymouth Council, the land value per sqm and improvement value per sqm is calculated. This is then summarised by suburb, size and typology to give the average per sqm value for various types of dwellings.

By splitting the valuation into land and improvement value, it accounts for variations of both sizes e.g., a large dwelling on a small piece of land compared to the same size dwelling on a larger piece of land.

Values are not the same across each suburb (due to differing structures and quality), and thus it is required to give the per sqm value for each suburb individually. Also, the per sqm rate for land and improvement value are shown not to be consistent across all sizes. For example, a larger dwelling has on average a lower per sqm improvement value than a smaller one. This inverse relationship between size and per sqm value is the same for both land value per sqm and building value per sqm.

It was also found that in modern residential developments, terraced dwellings do not have a statistically distinct improvement value to that of standalone dwellings. That is, building a 100sqm terraced home, is unlikely to sell for more than the same quality standalone home on the same sized land area. Although they typically cost slightly more on average due to the noise mitigation, this does not translate into additional value to the consumer over the standalone typologies. Therefore, the resulting build values are assumed to be the same between terraced and standalone for an equivalent quality build.

Rather, the value of terraced housing is inherent in the greater land utilisation and resulting higher land value per square metre.

TABLE 3: EXAMPLE OF HOW BUILDING VALUE AND LAND VALUE CAN VARY BETWEEN STANDALONE AND TERRACED DEVELOPMENT OPTIONS

Development Option on 500sqm site	Building Value per dwelling	Site Size per dwelling	Land Value per dwelling	Sale Price per dwelling	Land Value Per SQM	Total Land Value
One 100sqm Standalone	\$ 400,000	500	\$ 500,000	\$900,000	\$ 1,000	\$ 500,000
Two 100sqm Standalone	\$ 400,000	250	\$ 400,000	\$800,000	\$ 1,600	\$ 800,000
Three 100sqm Terraces	\$ 400,000	167	\$ 360,000	\$760,000	\$ 2,160	\$ 1,080,000

Source: *Property Economics*,

This is demonstrated in Table 3 which shows how the building value and land value varies between standalone and terraced development options. Note this is a generic example, it does not represent a specific site in New Plymouth).

As this table shows, the value of each individual 100sqm building does not change. Rather the value in building more terraces is inherent in the increase in land value from \$1,600 per sqm to \$2,160 per sqm, which is the result of being able to build more homes on the same site. If building terraces did not result in a greater yield (i.e., only two terraces or two standalone options) then the Feasible Capacity Model results would likely show the standalone to be the preferred option.



4. FEASIBILITY MODELLING OUTPUTS

4.1. FEASIBLE CAPACITY OUTPUTS

Property Economics has assessed the variables outlined above in the New Plymouth City market and run feasible capacity models across the range of locations, land values, improvement values, and land value changes. A key component of the market's willingness to develop infill is the relationship between a site's land value, fixed subdivision costs and the identifiable 'uptake' in value (sqm) through subdivision.

Table 4 below outlines a summary of the number of potential sections on sites where the ratios meet a profit level suitable to meet market expectations (20% for the purpose of this analysis).

TABLE 4 - FEASIBLE RESIDENTIAL CAPACITY BY ZONE - OWNER AND DEVELOPER

Zone	Theoretical	Apartments	Standalone	Terraced	Total
General Residential Zone	7,994		91	971	1,062
Low Density Residential Zone	84		12		12
Medium Density Residential	58,058	4,233	488	2,912	7,633
Residential	66,136	4,233	591	3,883	8,707
City Centre Zone	9,702	802	8	45	855
Local Centre Zone	1,860	4	16	14	34
Mixed Use Living	9,995	1,891	42	707	2,640
Town Centre Zone	3,025	15	1	12	28
Commercial	24,582	2,712	67	778	3,557
Total Capacity	90,718	6,945	658	4,661	12,264

Source: Property Economics

Table 4 represents the subdivision undertaken by either an owner occupier or a developer, with the capacity representing the most profitable. This is an important difference as motivations and capital outlay are often different. These figures have removed all 'double ups' i.e., where multiple instances were tested on a specific site and represent the most profitable scenario for that site.

If developments were to be undertaken by either a developer or owner occupier, there is then potential for 12,264 additional units within the New Plymouth City market. As all development options have been considered in Table 3, this represents the total feasible capacity in the market. This level of feasible capacity represents a 13% feasibility rate on the theoretical capacity.

Table 4 splits the capacity into the residential and Commercial Zones showing that 70% of feasible residential capacity lies within the residential zones, namely the Medium Density Residential Zone. The capacity assessed as being feasible in this zone is notably higher than the capacity as published in the Housing and Business Capacity assessment. This is predominately driven by the introduction of a Restricted Discretionary Development option which enables more than four dwellings per site and more permissive recession planes. This results in a



considerable number of apartments that are classified as feasible and the most profitable development option. The reality of whether or not these will be developed is assessed in the following section.

4.2. REALISABLE CAPACITY OUTPUTS

On top of the feasible capacity modelling, practical considerations must be taken into account as to what is likely to be developed in the real world. The realisation rates essentially provide for 'development chance' given the propensity for development variances.

These considerations are based on:

- Dwelling typology
- Development option
- Greenfield competition

The identification of these variables not only provides for sensitivities but also addresses the relativity between typologies. While all three typologies may be feasible the development model identifies the site scenario with the highest profit margin. However, practically while the model assesses the standard 20% profit margin, there is greater risk in some typologies. The assessment below endeavours to consider these risks, and motivation, differentials.

The HBA suggests that there are approximately 7,500 dwellings that are Reasonably Expected to be Realised in the Greenfield areas including the Undeveloped Residential Sites, Future Urban Zone and Special Development Area. Property Economics understand that due to the implications of the SASM and Archaeological Site subdivision rules, a significant quantum of this capacity is considered a Discretionary Activity and not enabled. Property Economics also understands that Council is intending to change the district plan to allow development on these sites. We also consider that the removal of large greenfield sites due to a constraint affecting only a small portion to be an unrealistic and unpractical modelling outcome.

Over the long term between 2024-2054, New Plymouth is forecast to require almost 9,500 dwellings under the Medium growth projections. Including the NPS directed competitiveness margin, New Plymouth would require capacity for a total of approximately 11,000 dwellings, thereby requiring approximately 3,500 dwellings to come from brownfield development.

On top of greenfield consideration, the relative risk of each development type must be considered in quantifying what will practically be developed by the market. The risk is not homogenous across typology or development type, and thus a matrix of 'risk factors' have been applied across each combination of typology and development type.



Risk has been accounted for developments undertaken by developers by increasing the required profit level for a development to be classified as 'realisable', on top of being feasible.

Table 5 below shows the profit levels required for each combination of typology and development option to be considered realisable by the model.

TABLE 5 - DEVELOPER REALISABLE PROFIT RATES

	Comprehensive Developer	Infill Developer	Infill Owner
Standalone	20%	17%	25%
Terraced	23%	20%	28%
Apartment	32%	28%	39%

Source: Property Economics

This reflects the market practicality that developments taken on by a developer have relatively lower risk if they are an infill development, rather than a comprehensive development. It also shows the increasing risk of development as the typology increases in scale from standalone dwellings, through to terraced product, and finally apartments.

For an owner occupier the model considers the profit level of the development relative to the capital value of the existing dwelling(s). This is because motivations for an owner to subdivide their property are inherently linked with the relative profit, they can achieve against the value of their own home e.g., a \$100,000 profit on a \$1,000,000 site will be less likely to be developed by the owner, compared to a \$100,000 profit on a \$500,000 site, assuming similar fixed costs.

Therefore, as a methodology for this, the model considers that the lowest quartile of feasible infill developments in terms of the relative profit / CV ratio will not be realised by the market.

For the activities that incur a Restricted Discretionary Consent, the realisable profit margin has been increased by to account for the increased risk.

Taking these market practicalities into consideration, Table 6 shows the realisable capacity for New Plymouth City. This shows that the expected realisable capacity of New Plymouth City's residential and commercial zones is 4,247 dwellings.

Notably, there is a considerable reduction in the apartment and terraced capacity in favour of Standalone dwellings. Although the Medium Density Residential Zone does enable apartment typologies, consenting trends in other major cities following plan changes that increased enablement (e.g. Auckland's Unitary Plan) have shown significant increases to townhouse / terraces construction but limited increase to apartments. Specifically, Townhouses, Units and Terraces grew from a historical average of 12% of total residential consents to 60% consents in the region over this past year. Within some of the urban sub-areas this proportion is considerably higher.

Therefore, the only expected apartment capacity is in the City Centre Zone.

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As expected, the realisation on standalone developments is higher than terraced, with realisable capacity for standalone developments higher than feasible capacity. This is due to expected changes in development scenarios and preferences such as a comprehensive redevelopment of a site being the most profitable option, but a standalone infill development scenario being considered the most likely to be realised.

TABLE 6 - NEW PLYMOUTH REALISABLE RESIDENTIAL DEVELOPMENT CAPACITY

Zone	Theoretical	Apartments	Standalone	Terraced	Total
General Residential Zone	7,994		765	18	783
Low Density Residential Zone	84		10		10
Medium Density Residential	58,058		1,156	1,426	2,582
Residential	66,136	0	1,931	1,444	3,375
City Centre Zone	9,702	86	24	54	164
Local Centre Zone	1,860		20	3	23
Mixed Use Living	9,995		232	444	676
Town Centre Zone	3,025		2	7	9
Commercial	24,582	86	278	508	872
Total Capacity	90,718	86	2,209	1,952	4,247

Source: Property Economics

Additionally, Table 7 breaks down the Realisable Capacity by Zone and Development Type. This shows that the realisable capacity is made up of a relatively even mix of Comprehensive and Infill development. Notably, this differs by zone with the General Residential Zone mostly favouring Infill and the commercial zones mostly favouring Comprehensive Redevelopment. These commercial sites typically have less unutilised space available and the sales price in efficient location for intensified dwellings is higher, making this development option more feasible.

TABLE 7: REALISABLE CAPACITY BY ZONE AND DEVELOPMENT TYPE

Zone	Comprehensive	Infill	Total
General Residential Zone	84	699	783
Low Density Residential Zone		10	10
Medium Density Residential Zone	1,315	1,267	2,582
Residential	1,399	1,976	3,375
City Centre Zone	161	3	164
Local Centre Zone	10	13	23
Mixed Use Living	652	24	676
Town Centre Zone	6	3	9
Commercial	829	43	872
Total Capacity	2,228	2,019	4,247

Source: Property Economics



5. COMPARISON TO PREVIOUS MODELLING

It is noted that the new capacity as modelled by Property Economics in this report is greater than the capacity published by the HBA. This is despite the apparent addition of several constraints that were not directly considered within the previous model. The Table below shows a comparison of these two sets of numbers which shows that the resulting Realisable Capacity of the Residential Zones is essentially the same, despite a higher Feasible Capacity.

TABLE 8: COMPARISON OF NEW MODEL RESULTS AGAINST RESULTS PUBLISHED IN THE HBA

As published in the HBA	Plan Enabled	Feasible	Realisable
Infill	5,773	4,637	3,324
Inner City Development	1,277	541	541
Total Intensification	7,050	5,178	3,865
New Model	Plan Enabled	Feasible	Realisable
Urban Intensification	66,136	8,707	3,375
Commercial and Mixed Use Zones	24,582	3,557	872
Total Intensification	90,718	12,264	4,247

Source: Property Economics

Most of the additional feasible capacity is the result of allowing RD activities in the MRZ and the resulting apartment capacity that is considered feasible but unlikely to be realised. ,

Although the modelling for the HBA arguably did not directly include all of the appropriate constraints, the modelling was purposefully conservative in its assumptions on the basis that it was a high-level model. As the new model is a more comprehensive assessment that directly models building floorspace, Property Economics believes that smaller minimum land areas which more closely reflect the actual level of enablement by the plan, are appropriate to adopt. A comparison of the minimum land area assumptions applied in the HBA model and the new model by typology are shown in the Table below.

TABLE 9: COMPARISON OF MINIMUM LAND AREAS BY TYPOLOGY

Minimum Land Areas by Typology	Old Model		New Model	
	General Residential	Medium Density	General Residential	Medium Density
Small Houses	320	200	200	150
Medium Houses	400	184	200	170
Large Houses	500	250	200	200
Small Units	200	150	200	100
Medium Units	200	150	200	100
Large Units	300	225	200	125

Source: Property Economics

The results of Property Economics new modelling suggest that conservatism applied in the previous model was appropriate. Even after undertaking a more comprehensive and complete



assessment of the capacity potential, the expected level of realisable capacity remains largely the same.

In order to demonstrate that Property Economics has incorporated the constraints into the model and that these constraints do affect capacity, Property Economics have also tested a scenario applying the old minimum land areas. The results of this modelling, shown in Table 10 below, shows a total net reduction of 4,076 Feasible and 954 Realisable dwellings relative to the baseline model shown in Section 4. These results also suggest a net loss of 651 Realisable dwellings within the Residential Zones relative to the results published in the HBA.

TABLE 10: SUMMARY OF CAPACITY APPLYING MINIMUM SITE SIZES UTILISED IN HBA MODEL

Zone	Theoretical	Feasible	Realisable
General Residential Zone	7,993	1,041	726
Low Density Residential Zone	84	12	10
Medium Density Residential Zone	12,149	2,881	1,937
Residential	20,226	3,934	2,673
City Centre Zone	9,702	934	197
Local Centre Zone	1,860	30	20
Mixed Use Living	9,995	3,254	399
Town Centre Zone	3,025	36	4
Commercial	24,582	4,254	620
Total Capacity	44,808	8,188	3,293

Source: Property Economics

Furthermore, at the start of this process, Property Economics tested the implications of the SASM and Archaeological Site constraints within the confines of the HBA model. This showed that the net loss in capacity within the Residential Zones was 479 Feasible and 328 Realisable Dwellings.

The capacity results shown in Table 10 above show modelling results which can be considered the closest to a 'like for like' comparison with the HBA with the added constraints. They do not however, represent the most accurate estimate of New Plymouth's residential supply. Property Economics believes that the total capacity results shown in the preceding section (Table 6) represent a more appropriate estimate of the district's potential supply. Furthermore, the numbers in Table 6 are considered conservative relative to the alternative scenario shown in the following section which allows for two dwellings per site.



6. ALTERNAIVE SCENARIOS

6.1. GENERAL RESIDENTIAL ZONE – TWO DWELLINGS PER SITE

The Theoretical model previously restricted development within the General Residential Zone to only one dwelling per site (minimum of 400sqm per site). This was a conservative assumption that was adopted at the time based on discussion with council and the complexities of allowing for unit titles. The subdivisions chapter of decisions version of the plan however does allow as a controlled activity the subdivision of land to create allotments around existing development and approved development a controlled activity (SUB-R7).

Property Economics therefore considers that it is an entirely reasonable assumption to include this capacity. Doing so, results in a substantial increase in the capacity potential of the zone because all the sites that are between 400sqm - 800sqm move from having no additional capacity potential to a net yield of one.

Table 11 shows a comparison of the capacity modelled within the General Residential Zone based on this key assumption. This highlights that the addition of allowing two dwellings per site more than doubles the assessed level of potential capacity within the General Residential Zone. This results in the total Realisable Capacity potential of New Plymouth City's rising to 5,503 dwellings.

TABLE 11: COMPARISON OF CAPACITY WITHIN THE GENERAL RESIDENTIAL ZONE BASED ON DWELLINGS PER SITE ASSUMPTION

General Residential Zone	Theoretical	Feasible	Realisable
One Dwelling per Site	7,994	1,062	783
Two Dwellings per Site	30,103	2,726	2,039
Difference	+ 22,109	+ 1,664	+ 1,256
Total Capacity with Two Dwellings in General Residential	112,827	13,928	5,503

Source: Property Economics

6.2. SASM AND ARCHEOLOGICAL SITES AS AN RD ACTIVITY

In response to concerns raised regarding the constrains imposed by the SASM areas and Archaeological areas, Council is considering a plan change that would make earthworks within the buffer area an RD activity in opposed to a Discretionary Activity. The change would also affect the development of sites that contain a SASM or Archaeological Site, moving from D to RD. Property Economics have assessed this possibility by modelling capacity within affected sites as two different scenarios. Either the development occurs outside of the 50m buffer as a fully permitted activity or the development can occur within the buffer as an RD activity (which incurs additional costs and risks).

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The results of this modelling show that this proposed change to the district plan will increase the level of Feasible capacity by 1,203 dwellings, and the number of Realisable Dwellings by 239 dwellings.

TABLE 12: SUMMARY OF CAPACITY, ONE DWELLING PER SITE IN GENERAL RESIDENTIAL AND SASM AND ARCHEOLOGICAL SITES AS AN RD ACTIVITY

Zone	Theoretical	Feasible	Realisable
General Residential Zone	9,814	1,241	815
Low Density Residential Zone	192	29	11
Medium Density Residential Zone	59,369	8,049	2,751
Residential	69,375	9,319	3,577
City Centre Zone	13,796	1,153	181
Local Centre Zone	1,920	35	23
Mixed Use Living	10,929	2,932	696
Town Centre Zone	3,061	28	9
Commercial	29,706	4,148	909
Total Capacity	99,081	13,467	4,486

Source: Property Economics



Draft Future Development Strategy for Ngāmotu New Plymouth 2024-2054

*Post-hearing track changed version
May 2024*



1. Introduction

1.1 What is the Future Development Strategy for Ngāmotu New Plymouth?

This ~~draft~~ Future Development Strategy for Ngāmotu New Plymouth (the ~~draft~~-FDS) has been prepared by Taranaki Regional Council and New Plymouth District Council (the Councils). Its purpose is to set out the strategic framework for providing for urban growth to meet the needs of New Plymouth district. It gives direction to the community about where new homes and businesses will be located. It describes the priority issues we need to start to address now, and the collective aspirations we have for the future of our urban areas.

This ~~draft~~ FDS is supported by a Technical Document that provides additional detail on the data and research that has been utilised to inform the FDS.

The Government introduced the National Policy Statement on Urban Development 2020 (NPS-UD) in August 2020 (updated 2022)¹. The NPS-UD outlines the requirements for what a FDS must show and be informed by. It states that the purpose of the FDS is to promote long-term strategic planning by setting out how the Councils intend to:

- Achieve well-functioning urban environments in their existing and future urban areas;
- Provide at least sufficient development capacity over the next 30 years to meet expected demand; and
- Assist with the integration of planning decisions under the Resource Management Act (RMA) with infrastructure planning and funding decisions.

To achieve a well-functioning urban environment, the NPS-UD requires that a FDS:

- Provides for a variety of homes that meet local needs and enable Māori to express their cultural traditions and norms;
- Provides a variety of land suitable for local business needs;
- Enables good accessibility for all people between housing, jobs, community services and open spaces, including by public or active transport;
- Supports the competitive operation of land and development markets;
- Supports reductions in greenhouse gas emissions; and
- Necessitates being resilient to the current and future effects of climate change.

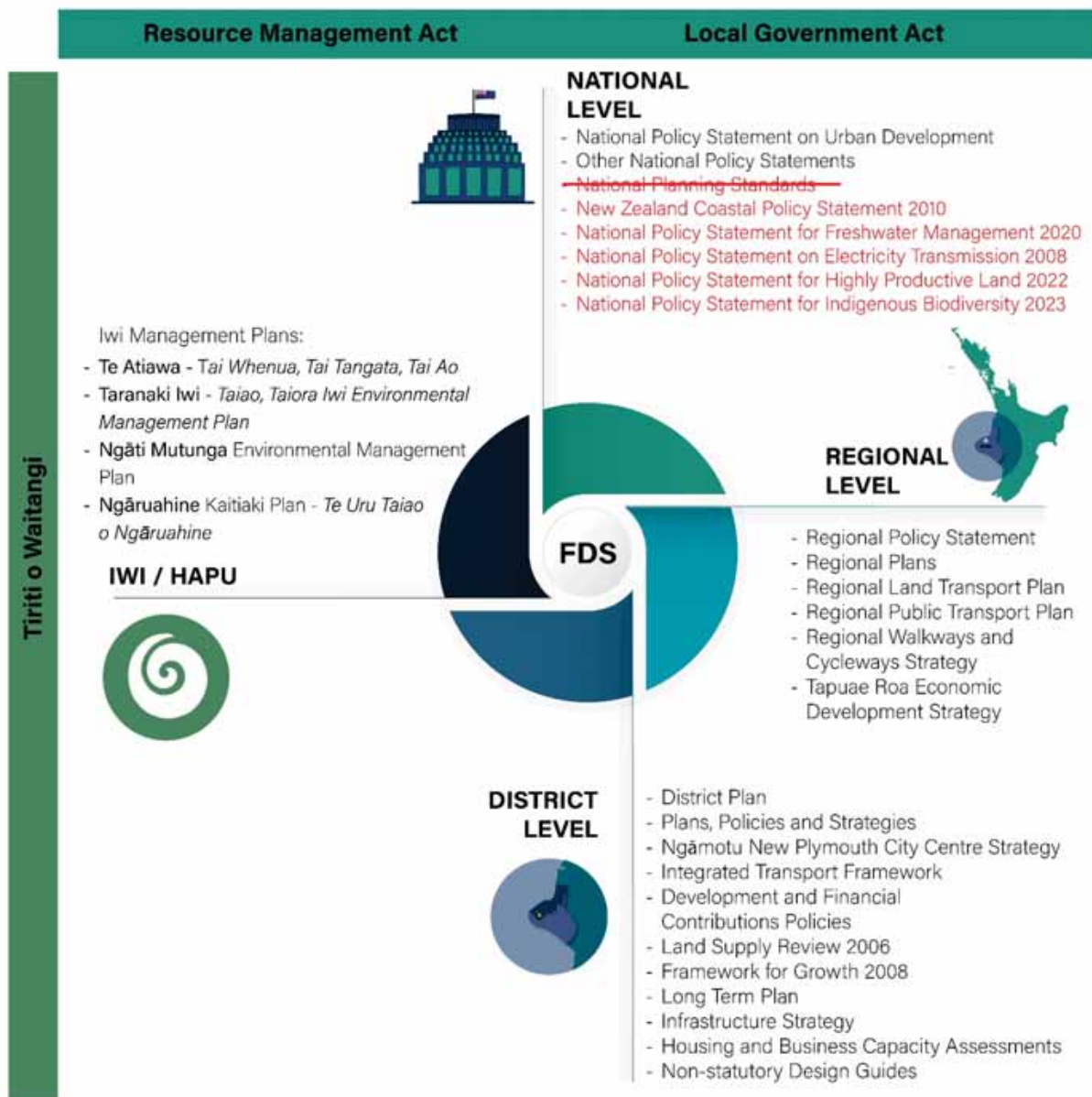
For more information on the content requirements of a FDS refer to Section 2 of the Technical Document.

¹ MfE, National Policy Statement on Urban Development 2020, (<https://environment.govt.nz/acts-and-regulations/national-policy-statements/national-policy-statement-urban-development/>)

1.2 Policy framework - Where does the ~~draft~~ FDS fit?

The ~~draft~~-FDS sits within a framework informed by legislation, Government policy, regional and district strategies and plans, as well as the values and aspirations of tangata whenua and the local community. Figure 1 below shows examples of the documents that have been taken into account in its development.

Figure 1: Documents informing the development of the ~~draft~~ FDS



Importantly, the Councils must also have regard to the FDS when preparing RMA planning documents. The Councils are also strongly encouraged to consider the FDS when considering long-term plans (LTPs), along with other plans and strategies developed under the Local Government Act, this is to ensure alignment of infrastructure and projects that facilitate delivery of a FDS.

1.3 Outcomes for the FDS *(outcome statements have been moved to the Introduction section and re-ordered into alphabetical order).*

The ~~draft~~ FDS is guided by the following outcomes that set out how we want to provide for growth. These have been informed by our understanding of national policy direction, hapū and iwi development aspirations, and community and stakeholder views.

FDS OUTCOMES	
ACCESS	The district develops as a compact urban environment, where people can access jobs, services, education and open space.
CAPACITY	There is sufficient development capacity available to meet the short, medium and long-term housing and business demands of <u>in</u> the district.
CENTRES	The district has a hierarchy of vibrant and viable centres that are the location for shopping, leisure, cultural, entertainment, residential and social interaction experiences and provide for the community's employment and economic needs.
CHOICE	A variety of housing types, sizes and tenures, including papakāinga <u>and other rohe-based housing responses and strategies</u> , are available across the district in quality living environments to meet the community's diverse cultural, social and economic housing and well-being needs.
<u>COLLABORATION</u>	<u>The Councils and tangata whenua work responsively with the development community to support appropriate development</u>
ENVIRONMENT	Urban environments are designed to integrate and enhance natural features and minimise environmental impacts.
EMISSIONS	Urban form supports reductions in greenhouse gas emissions.

FDS OUTCOMES	
HEALTH, SAFETY AND EQUITY	<u>Urban development and housing supports equitable health and wellbeing outcomes for the diverse needs of all residents.</u>
HIGHLY PRODUCTIVE LAND	New Plymouth district’s highly productive land is protected from inappropriate urban development. Urban rezoning of highly productive land is only appropriate where it is necessary to provide sufficient development capacity for housing and business land and there are no other reasonable and feasible options.
INFRASTRUCTURE	New <u>and existing</u> infrastructure <u>to support growth</u> is planned, funded and delivered <u>in an efficient and integrated manner to maximise investment</u> to integrate with growth and existing infrastructure is used efficiently to support growth.
PARTNERSHIP WITH TANGATA WHENUA	<u>Partnership between Councils and tangata whenua provides for u</u> Urban development and <u>growth, and protection and preservation of form</u> recognises and provides for the relationship of tangata whenua with their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes and other taonga of significance <u>within their rohe.</u>
RESILIENCE	The urban environment is resilient to the likely current and future effects of natural hazards including climate change.

2. Growth Planning in New Plymouth

One of the key functions of Council is planning the way the district is shaped (where people live and work) and how people get around it. This means prioritising and managing future growth so that the community will know the expectations around how we will grow, the standard of amenity required and the supporting infrastructure requirements so that informed investment decisions can be made. Such decisions last for many decades and impact on people’s day-to-day lives, so it is important to get it right.



2.1 Previous Growth Planning

This strategy builds on many years of comprehensive review and planning undertaken by New Plymouth District Council to provide for urban growth in the district. Notably, the Land Supply Review (2007) and the Framework for Growth (2008)². This work considered and identified appropriate locations for urban expansion and District Plan rezoning changes. The more recent District Plan Review (2015-2019) and Proposed New Plymouth District Plan (PDP) (2019-2023)³ processes have involved comprehensive land use analysis/audits and rezoning. Together with a directive strategic policy framework, these efforts are designed to provide housing and businesses in the right locations to meet our community’s long-term needs.

Some key Proposed New Plymouth District Plan decisions on urban development and growth include:



A timeline of this previous work is shown in Figure 2 below. This work has provided a sound evidence base and background for the development of this ~~draft~~ FDS, by setting out where development capacity can be provided and the policy direction to deliver a well-functioning urban environment. Further detail can be found in the Technical Document supporting this ~~draft~~ FDS.

² NPDC, *Framework for Growth* (2008), (<https://www.npdc.govt.nz/media/txeg5fvp/framework-for-growth.pdf>)

³ NPDC, *Proposed New Plymouth District Plan Homepage*, (www.proposeddistrictplan.npdc.govt.nz)

Figure 2: Timeline of Previous Growth Planning Work



Growth planning undertaken as part of the recent PDP process preceded this FDS. However, the PDP process involved detailed analysis of New Plymouth’s urban environment and significant work to determine the suitability of areas of land for various urban uses. In addition, the PDP itself is drafted to give effect to higher order policy direction, notably the NPS-UD and NPS-HPL.

2.2 Future Growth Planning

Collaboration and Transparency

The Councils recognise that the delivery of our district’s growth and development will come from our development community. Relationships will be crucial for effective growth planning, PDP implementation, and the realisation of development capacity in well-functioning urban environments.

The Councils are committed to facilitating transparent processes to improve and build the growth model with ongoing collaboration with the development community. To ensure confidence in the data and expertise relied on, the Councils seek a culture of working together to explore different and responsive ways of doing things. This collaboration will inform future Council work programs and respond to changing conditions.

Collaboration and transparency will be supported by the following mechanisms:

- [Ngāmotu Planning Advisory Panel](#)
- [Engagement with iwi and hapū](#)
- [Developers Forum and Technical Professional Group](#)
- [Regular reporting to elected members](#)

[Ngāmotu Growth Advisory Panel](#)

[As part of the officers' response to submissions on the draft 2024-2054 FDS, a key initiative was to set up a Growth Advisory Panel to allow the Councils to work collaboratively with the development sector. The panel will be an independent advisory body and will not have statutory decision-making powers. However, the recommendations made by the group will inform the review and development of Council growth and development documents.](#)

[A key principle of the Ngāmotu Planning Advisory Panel is to provide more interactive opportunities to share and input on key issues, allowing issues to be raised early in the planning process to ensure a robust approach to growth planning. The group provides an elevated forum for information sharing and engagement with and between the development sector, iwi/hapū, and Council officers to identify opportunities for urban and other development.](#)

[The panel supports the provision of growth through best practice advice from interdisciplinary subject matter experts with experience in the District. The panel adds value to planning processes including \(but not limited to\):](#)

- [Housing and Business Capacity Assessments;](#)
- [Development Contributions Policy;](#)
- [Structure planning and master planning for development areas;](#)
- [Spatial planning;](#)
- [Infrastructure scheduling;](#)
- [FDS and annually reviewed Implementation Plan; and](#)
- [PDP maintenance and implementation.](#)

[The role of the panel is to:](#)

- [provide independent growth and development advice to identify significant future development opportunities;](#)
- [work in partnership with Council to provide pre-consultation advice to inform growth and development work;](#)
- [provide peer review and feedback on Council documents and modelling;](#)
- [assist with development of Council's modelling and data information as appropriate;](#)
- [provide advice to Council on the current state of play in the development sector to help guide future planning work programs; and](#)
- [assist Council with ongoing monitoring of planning provisions to identify efficiency opportunities.](#)

[The anticipated membership of the Ngāmotu Growth Advisory Panel would include a range of professional expertise.](#)

[The panel is supported by Council officers, who liaise and involve as appropriate other local, regional and national government agencies, tangata whenua and other stakeholders.](#)

Iwi and hapū engagement

Both Councils have established relationships with iwi and hapū and meet regularly to address resource management planning issues.

Ngā Kaitiaki Roopū was formed in 2016 specifically to provide feedback as part of the New Plymouth District Plan Review but the scope of its work has evolved and expanded since then. Ngā Kaitiaki consists of mandated representatives from iwi and hapū throughout the district. Ngā Kaitiaki meet with NPDC officers multiple times per year to provide opportunities for engagement.

The Taranaki Regional Council (TRC) freshwater policy work features an agreement with the eight iwi of Taranaki which enables greater iwi and hapū involvement in freshwater policy development. Supported by a dedicated pou taiao planner, members of this group are directly involved in the policy development process and also assist the Council in improving hapū involvement and relationships in respect of freshwater management. Three iwi representatives are also appointed to TRC's Policy and Planning Committee and the Operations and Regulatory Committee. Appointees chosen must have connections to one of the three Taranaki waka, and act in the interests of the committee they are part of, while bringing an iwi perspective to the table.

The district's iwi and hapū play an important role in relation to growth. The FDS and PDP embed the role of tangata whenua as cultural experts in resource management processes. Funding is identified within LTPs to support tangata whenua involvement in Council processes.

Developer's Forum and Technical Professional Group

The Developers Forum first began in 2016 as the "CBD Landowners and Developers Forum" and consists of landowners with interests in large land development projects. The Technical Professional Group was established in 2021 and consists of development professionals, such as architects, designers, builders, surveyors, engineers and planners. Council established these two groups and hold regular update meetings. Looking forward, Council seeks to facilitate more interactive opportunities aligned with the Growth Advisory Panel to share and input on key issues.

Regular reporting to elected members

For increased transparency, NPDC will regularly report to the Strategy and Operations Committee to update on growth planning and implementation, to provide good information to elected members and the community using this public process. This would involve reporting of statistics around infill, changes to the modelling since the last report, and actively show that housing capacity and growth planning is not static. This will give elected members, planning officers and the development community opportunities to identify and raise issues early.

Doing things differently

The way the district grows will need to differ from past patterns of development. In the past the district's large rural area provided opportunities for subdivision and lifestyle living. Along with the rest of the country, however, we have realised that the productive capacity of rural land is a finite resource and cumulative effects of rural lifestyle subdivision result in fragmentation of the rural environment. Previous urban development in the district was characterised by urban sprawl with low density development and car-dependent lifestyles.

The purpose of the new National Policy Statement for Highly Productive Land (NPS-HPL) is to ensure the availability of New Zealand's most favourable soils for food and fibre production, now and for future generations. It provides clear direction that using highly productive land for housing and business growth is only appropriate where it is necessary to provide sufficient development capacity and there are no other reasonable and feasible options.

The Councils want to support the development community to approach growth differently. We need to consider whether the current model for greenfield developments in the district, which has largely resulted in large-lot residential sites, is an efficient use of land.

In order to deliver increased housing capacity in a more coherent manner, NPDC is taking a new strategic approach for enabling growth through the provision of infrastructure, instead of leaving it to developers to install this on a project-by-project basis as and when individual landowners decide to develop. The Puketapu Structure Plan Development Area is the first area intended to be approached in this manner, with roading, bridges, comprehensive stormwater management, parks, wastewater and water all budgeted for in the draft LTP.

The FDS and PDP signal a shift to modern master-planned suburbs instead of traditional greenfield development. It is considered appropriate that when master planning structure plan development areas and future urban zones, NPDC and the development community consider methods to provide greater densities with good urban design in appropriate locations. These methods could be regulatory, non-regulatory or a mix of both.

Examples of possible regulatory methods include:

- Removing minimum lot size and maximum building coverage requirements in the PDP General Residential Zones provided that housing developments will be well laid out and designed. This will help developers to supply a variety of lot sizes and housing designs, allowing a more diverse mix of people from a larger pool into the market.
- Use of inclusionary zoning. This is a planning technique implemented through district plan zoning which aims to address housing affordability by ensuring that a proportion of new residential units are offered at prices that are accessible to a broader range of income levels, e.g. developers could be required to sell or rent 10-30 percent of new residential units to lower income residents in new Residential Zones, developers could be required to pay an "affordable housing financial contribution" in new Residential Zones, whereby the money is given to a registered community housing provider supplying them with an ongoing funding stream to construct or facilitate access to affordable housing.

Examples of non-regulatory methods include:

- NPDC could enhance the services it provides to developers to help them navigate the consenting process, e.g. free pre-application meetings, case management and urban design peer review.
- Developers could be given density bonuses and financial incentives by NPDC if they will provide well laid out and designed developments that contribute positively to the district's residential intensification needs, e.g. allowing them an extra floor over and above the height limit specified for the zone in the PDP, waiving resource/building consent fees, rates remission during the development phase, reduced development contributions.
- NPDC could improve the public's perception of medium density housing through educational material.

Spatial Plans

Concurrent work is underway on spatial plans for Waitara and Bell Block, with a spatial plan for Inglewood scheduled to commence in 2026. Spatial plans help guide investment and provide much needed assurance to the people that live in those areas that the Council and other key agencies are committed to working collaboratively to develop a plan that connects the natural environment, built environment, infrastructure, land use and destination spaces for the benefit of all who live there now and future generations.

This work takes a holistic long-term strategic view of those areas and will help to inform any new growth opportunities for those communities. It will be an input for both residential, industry and business capacity and the outcomes of the spatial plans will inform the next FDS.

The spatial plans to be developed relate to a specific township as well as its wider surrounding area. The boundaries for each spatial plan would be identified as part of that planning process. Through the spatial planning process, new areas will be considered for additional residential and business growth.

Other next steps

Through submissions on the draft FDS 2024-2054, Council has acknowledged that an omnibus plan change is a mechanism to address some of the difficulties the development community have experienced with the Proposed District Plan. A decisions version of the Proposed District Plan was released in May 2023 and implemented a policy shift (and therefore a rules shift) in many Overlay chapters. The FDS submissions and hearings made a clear case there are pinch points in some of the District Plan rules. Council's Growth and Services team are committed to looking into fine tuning the mechanics of plan that developers believe are impinging development implementation.

3. Development Context

3.1 Providing for our Growing and Changing Population

Population growth is a consistent trend in our district. Since 2001, we've experienced an annual growth rate of 1-2 per cent, resulting in a current population exceeding 89,000. This upward trajectory is projected to continue, with a population of approximately 98,800 by 2034 and around 110,400 by 2054.

NPDC forecasts that the district's population will grow over the next 30 years as follows:⁴

	2024	2029	2034	2039	2044	2049	2054
Population	89,000	93,500	98,800	102,400	106,400	108,500	110,400

The key driver of population growth in New Plymouth has been, and will continue to be, people moving from other parts of New Zealand and overseas which drives housing demand. Other drivers, such as demand for visitor accommodation, student accommodation and seasonal worker accommodation, are relatively minor compared with other parts of New Zealand.

On average we will need an additional 368 houses per year over the next 30 years.

Our demographics are also changing. As a district, we are getting older, with the greatest increase in the 65 and over age group. By 2048, almost 30 per cent of the population will be aged over 65. A bigger ageing population and single-person and couple-only households will result in greater demand for rest homes and retirement villages and for smaller, accessible housing options. Noting that increased housing choice will have long-term benefits for our district, an ageing population means that we are likely to see an increased percentage of fixed income ratepayers resulting in downward pressure on rates.

New Plymouth is increasingly being enriched by a variety of cultures and demographics that require a variety of housing sizes and types, including different mixes of housing for both smaller and larger households. Typical housing options currently available aren't suitable for all family structures. This is particularly evident when considering housing concepts important to tangata whenua, such as intergenerational living arrangements.

The availability of affordable, healthy long-term rental options is closely tied to demographic factors, as is the need to increase the availability of accessible housing for disabled individuals, lower-cost accommodation, and social housing.

⁴ NPDC, Housing and Business Capacity Assessment (2024)

A mix of housing densities enables communities to respond to the changing needs and demographics of its residents through their lifecycle. The ability for people to remain living in the same community with their social networks nearby is hugely important.

Looking at the housing trends in the district, overwhelmingly the most predominant building type is the three-to-four-bedroom detached house and there is a considerable lack of other types of houses such as units, flats, townhouses, studio accommodation etc.:

	Standalone Houses	Townhouses, flats, units, and other dwellings	Apartments	Retirement Village Units
Last 12 months	81%	6%	2%	12%
Last five years	80%	7%	2%	11%
Last 10 years	61%	6%	10%	22%

The Housing and Business Capacity Assessment 2024 projects that:

- Based on market trends and projected household composition growth, it is estimated there will be an increase in the number of attached multi-units to about a quarter of all new housing in New Plymouth by 2051.
- The remaining three quarters of all new housing in New Plymouth will be standalone dwellings by 2051. Standalone dwellings will continue to require an average minimum floor space of 180m² and accommodate 3-4 bedrooms.
- In the long-term it is estimated that apartments will make up a small portion of the demand.
- The demand for retirement villages which presently is around 5-8 per cent of all resource consent applications, is expected to continue. Retirement Villages are anticipated within the residential and centres zones, however given their scale, finding suitable land within these areas to accommodate the scale of the activity can be challenging.

Under the current market offer, greenfield development is typically more feasible than infill development, with greater economic feasibility for residential greenfield development compared to infill development. Thinking about our changing demographics and the need to provide a for a variety of housing choices, it is anticipated that the increased demand for smaller houses, units, flats, etc. will drive a change in development trends.

Rezoning rural land for greenfield development needs to be carefully considered as this can result in ad hoc urban form and infrastructure networks and disconnected neighbourhoods.

3.2 Managing Urban Growth

Urban population growth comes with benefits and challenges. Benefits may include:

- New and modernised housing that increases supply, potentially reducing pressure on house and rental costs, and increases health and wellbeing;
- Economic growth and the development and expansion of the labour force;
- Greater availability and variety of consumer goods and services such as cafes and shops;
- New and varied amenities that increase health and wellbeing;
- Opportunities for education, employment and civic amenities;
- Opportunities for social cohesion and interaction and cultural diversity; and
- Cheaper transport costs.

Key challenges may include:

- Ensuring feasible, serviced and developable land is available to meet the growing population's demands;
- Ensuring that subdivision and development is carefully planned and managed;
- Managing the type and location of growth to minimise infrastructure servicing costs; and
- Maintaining housing affordability in the face of increased demand.

To ensure that we gain the benefits, we need to plan carefully so that future urban growth is appropriately located and managed, and that it occurs predominantly in identified areas that are suitable for growth.

Well-planned and 'compact' urban areas generally result in the most efficient use of land and provide for development where services and infrastructure already exist. Compact towns can improve the quality of life for residents and reduce the environmental footprint of growth. They also support a sustainable and effective transport system.

At a day-to-day level, the community benefits from being able to live within easy walking distance to efficient public transport, shops, community facilities and public amenities such as pools, and to areas of employment. These benefits make living in the district more affordable and better for our general health and wellbeing. They also counter the potential negative consequences of 'urban sprawl', such as increased traffic congestion and demand for new infrastructure and services. Compact towns reduce the need to commute, air pollution from the use of vehicles and the potential for traffic accidents. A community that rides and walks to their destinations can better manage any potential secondary health impacts caused by insufficient exercise.

3.3 Planning for and Provision of Infrastructure

The district’s infrastructure, encompassing a combination of public and private network utilities as well as social infrastructure, is critical to the social, economic and cultural wellbeing of our community. Network utilities include transport networks (land, sea and air), piped networks (water, wastewater and stormwater reticulation), [waste management infrastructure and services](#), flood protection infrastructure (stop banks and spillways), transmission and distribution networks (electricity, gas and liquid fuels) and radiocommunication and telecommunication networks (wired and wireless). Social infrastructure includes medical and health services, community corrections activities, justice facilities (such as police stations and courts), educational facilities, public open space and community infrastructure.

To support New Plymouth’s growing population, there is a need to look after existing infrastructure networks through operational expenditure (i.e. maintenance and upgrades) and as well as to provide new infrastructure networks and services (i.e. capital expenditure/new builds).

From the Councils’ perspective, the ability to provide infrastructure has limitations in relation to both affordability and deliverability. It is therefore essential that growth is appropriately located and connected to existing urban boundaries and can be efficiently serviced by infrastructure. It is also important that landowners pay an appropriate share of the infrastructure investment that they will benefit from. The Councils therefore need to have a clear understanding of what is required, what is affordable, how it will be paid for and how to get the best value from the investments we decide to make.

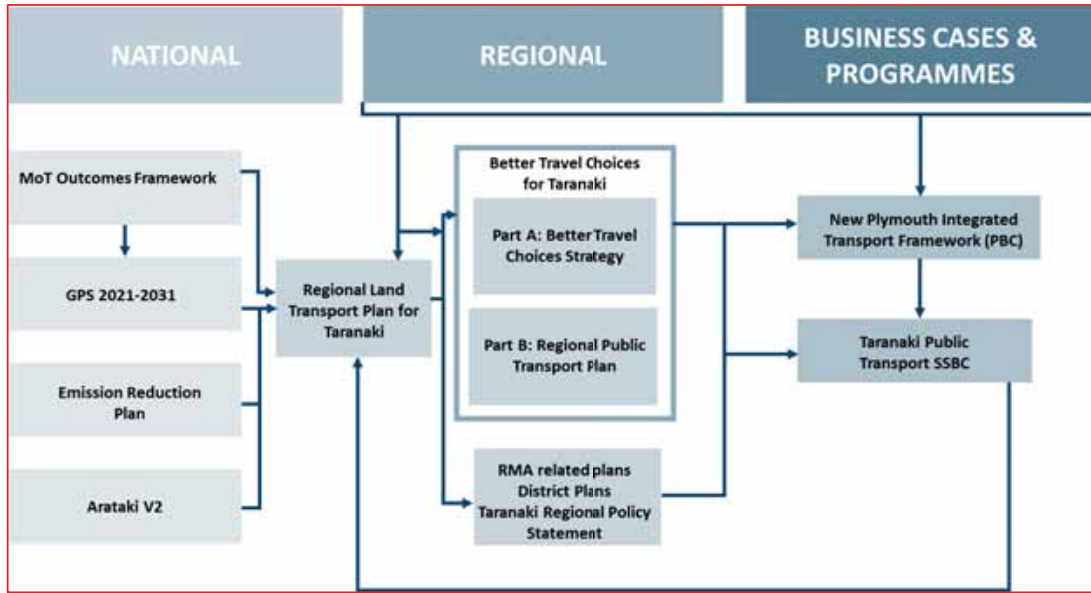
Ad hoc or isolated infrastructure networks can result in greater financial costs (capital and lifecycle) when compared to building in established urban areas.

Clearly understanding and planning the timing of delivery for key infrastructure projects to support urban growth is also essential. The lead in times relating to investigation, design and delivery for these pieces of work all require considerable time. It is also not financially viable to deliver these projects at one time. As such, the Councils need to carefully consider how and when to fund and deliver infrastructure to enable growth and development in a cost-effective and efficient way. Strategic documents like NPDC’s draft Integrated Transport Framework ([ITF](#)) and Infrastructure Strategy help in this planning and decision making.

[The Draft ITF is a 30-year framework to help guide transport decision making and investment in the district and to prioritise projects and initiatives for implementation in the next 10 years. The Draft ITF seeks to consolidate existing transport strategies to create clear, effective plans while working alongside our national and regional partners, such as Waka Kotahi, Taranaki Regional Council, and other key stakeholders. It seeks to highlight key drivers for change – drivers that will form the foundation of our framework into the future. The Draft ITF identifies four key outcomes that it seeks to address through initiatives and interventions including: improving public transport; fixing a fragmented active travel network; reducing reliance on private cars and adapting to urban development.](#)

[With regards to the provision of public transport \(PT\), the Councils recognise that broad changes will need to be undertaken to better integrate transport options with current and future urban development. TRC](#)

are currently in the process of undertaking a Single Stage Business Case with Waka Kotahi, to investigate options for a step change in PT provision. The FDS is a feeder document to this work stream. As such, the detail of how PT services will respond to future growth is not known at this point in time, but growth scenarios are informing the development of options and ultimately funding bids for future PT services. This work stream is reflected in TRC’s Regional Land Transport Plan (RLTP) (as a no.1 priority) and LTP.



The PDP has enabled a greater level of intensification across existing urban areas, which will increase the need to upgrade and provide new infrastructure to support this. Similarly, enablement of greenfield areas will require significant upfront planning and investment in infrastructure. The draft implementation plan in Section 6 provides an overview on proposed projects and their timing that will enable the Councils to accommodate the identified growth, in particular delivering the infrastructure that will be required for these areas.

3.4 Protecting the Natural Environment

The New Plymouth district is home to a unique natural environment with significant areas of indigenous vegetation, rivers and waterways, and black-sand beaches. The New Plymouth urban area has one of the highest vegetation coverage of any urban area in New Zealand.

The health and protection of the natural environment is a strategic issue for the district. The ecological health of the natural environment and the community’s access to it are critical to the success of urban spaces. A well-functioning urban environment relies on a well-functioning natural environment, which is resilient to natural hazards and the effects of climate change.

Development and intensification can put pressure on the natural environment, particularly impacting on provision of connected areas for water, soils, plants and animals to thrive. Growth planning should work with the environment rather than against it and should be planned in a manner that allows space for natural environmental features and processes, improved biodiversity, enhanced water quality, ecological health, natural hazard resilience, water supply security, and recreational and amenity values. This will require the Councils and developers to prioritise outcomes that integrate the built and natural environment.

There is an opportunity to integrate in a balanced way protection of natural and cultural values with landowner aspirations. Past growth has negatively impacted the mauri (life force) of the natural environment. By taking a mātauranga Māori approach development can be planned to protect and restore our ecological taonga as urban spaces grow and change.

While certain natural areas may require modification to support urban development and the associated infrastructure needed for growth, not all areas will be suitable for expansion. Some might face constraints or limitations for providing additional residential and business capacity. Section 4.4 of this ~~draft~~ FDS recognises the importance of the natural environment in the spatial identification of constraints on development.

3.5 Climate Change

Taranaki is both one of the sunniest and windiest regions in Aotearoa. Our moderate climate often enjoys more than 2,500 sunshine hours a year, but we are exposed to weather systems migrating across the Tasman Sea that influence our rainfall intensity.

However, it is recognised that our local climate is changing. The National Institute of Water and Atmospheric Research (NIWA) in the report *Climate change projections and impacts for Taranaki (2022)*⁵ predicts increases of 0.5 to 1.0°C by 2040 and 1.25-3.0°C by 2090.

The impacts of climate change on our environment and communities are anticipated to be significant. Climate change will bring warmer temperatures, extreme weather patterns, including increased rainfall intensity, and rising sea levels. Natural hazards such as droughts and flooding will become more severe, and existing challenges around coastal erosion and stormwater flooding will be exacerbated. Ecosystem health, water quality and availability will need careful management. We need to make space for water and look after ecosystem services. These factors affect our existing urban areas and needs to inform where and how we accommodate growth.

⁵ NIWA, *Climate change projections and impacts for Taranaki (2022)*, (<https://www.trc.govt.nz/assets/Documents/Environment/Climate/Climate-change-projections-and-impacts-for-Taranaki-May-2022.PDF>)



Coastal Erosion at Motukari Reserve, Onaero

Support electrification of the economy

The National Policy Statement on Electricity Transmission (NPS-ET) preamble states that ongoing investment in the transmission network and significant upgrades are expected to be required to meet the demand for electricity and to meet the Government’s objective for a renewable energy future, therefore strategic planning to provide for transmission infrastructure is required.

Throughout New Zealand including New Plymouth, the National Grid will play a critical role in electrification of the economy to reduce greenhouse gas emissions. This means ensuring that existing National Grid assets in the district are able to be operated, maintained, upgraded and protected from inappropriate subdivision, land use and development. It also means that new development of the National Grid including transmission line connections to renewable energy generation will be required in the future.

The NPS-UD sets direction for New Zealand’s urban environments to support reductions in greenhouse gas emissions and be resilient to the effects of climate change. Land use planning documents such as the District Plan and the FDS, and other planning documents such as Council’s Climate action framework (2019)⁶; Emissions Reduction Plan (2023)⁷; Adaptation Plan (drafting underway); and the 10-Year Plan for “Planting our Place”⁸ have a key role in supporting a reduction in greenhouse gas emissions and ensuring that communities can adapt to the effects of climate change.

⁶ NPDC, *Climate action framework*,
(<https://www.npdc.govt.nz/community/a-greener-district/climate-response/>)

⁷ NPDC, *Emissions Reduction Plan*,
(<https://www.npdc.govt.nz/council/strategies-plans-and-policies/plans/emissions-reduction-plan/>)

⁸ NPDC, *Te Korowai o Tāne - Planting Our Place*,
(<https://www.npdc.govt.nz/community/community-partnerships/funding-and-grants/te-korowai-o-tane-planting-our-place/>)

The PDP contains provisions that relate to:

- Compact urban form that reduces the need for private motor vehicles and considers energy efficiency;
- Transportation planning that allows for electric vehicles and a reduced need for private vehicles;
- Managing growth and development carefully in respect of known risks from natural hazards, including the effects of climate change;
- Adaptive management to support communities impacted by natural hazards, including the effects of climate change;
- Protection of significant natural areas (SNAs) and promoting restoration of water bodies and indigenous biodiversity; and
- Recognising emerging technologies that offer potential for a transition to a low-emission economy.

Our planning needs to take a long-term view of what our community will need to live, work and travel in a low-emissions future. The Councils can continue to encourage a compact urban form and focus on building communities with infrastructure that enables increased public transport use and active travel, such as walking and cycling. We can plant our green spaces to offset emissions and follow legislation to consent homes and buildings that are warmer and more energy efficient.



NPDC Electric Rubbish Truck



Planting our Place



Cycling to school along Paynters Ave overpass

4. Inputs to our Spatial Response



4.1 Hapū and Iwi: Values and Aspirations for Growth

The NPS-UD requires the FDS to include a statement of hapū and iwi values and aspirations for urban development. This draft statement was developed through NPDC's Ngā Kaitiaki hapū and iwi resource management working group. The Councils did not receive any further comments on or proposed changes to the aspiration statements through the submission period.



The preservation of the wider environment should be at the centre of urban design



It is imperative that urban design extends beyond the confines of physical structures. The vitality of our lands and waters, and the holistic well-being and preservation of the natural environment must be accorded greater significance compared to architectural design.

The alteration, contamination, and degradation of waterbodies, the imposition of inappropriate stormwater infrastructure, and the dismantling of natural landforms and established flora deeply unsettle tangata whenua within our district. These actions reverberate through the interconnected ecosystems, impacting not only the physical environment but also the socio-cultural fabric that binds us.

Development affecting sites and areas sacred to Māori, coupled with the preservation of heritage features and critical viewshafts, stands as an ongoing concern for tangata whenua within our district. The loss of these culturally significant spaces erodes the foundation of our identity, disrupts social structures, and hampers the intergenerational transmission of knowledge and connection to the whenua.

It is paramount that our approach to urban development transcends mere accommodation and integrates a profound respect for the intrinsic values held by mana whenua. This approach should not only mitigate the adverse effects of urban development on the environment and social structures but actively promote practices

that rejuvenate, safeguard, and enhance the interconnected relationships between the land, water, people, and culture. This, in turn, will foster a sustainable, harmonious, and flourishing future for all within our district.



The integration and manifestation of the tangata whenua world view shapes the physical and cultural essence of our environment



Mana whenua seek not only recognition but a profound integration of their worldview into the very fabric of the environment. The desire is for tangata whenua to not only be seen but to witness a reflection of themselves in the landscapes that shape our collective existence. This approach safeguards the tangible markers of cultural heritage but also ensures an ongoing and dynamic presence within the evolving urban landscape.

Empowering tangata whenua in the co-creation of subdivisions, structure plan areas, public spaces, and built forms serves as a potent catalyst in amplifying the visibility of Te Ao Māori within our district. Historically, this visibility has been regrettably absent, despite the enduring historical and cultural presence of tangata whenua in the Ngāmotu district.

Recognising that each hapū possesses unique tikanga and a distinctive narrative for the cultural landscape within their rohe, our future urban development should champion the manifestation of these diverse expressions. The undertaking of Māori cultural and purposeful activities, coupled with the infusion of language, technology, design, and public art, as well as culturally significant signage for key developments, public spaces, buildings, and road names, becomes pivotal in bringing forth the richness of Te Ao Māori.

The preservation of sites and areas of profound significance to Māori, coupled with their adaptive management in the urban environment, emerges as a crucial element in fortifying their visibility.

In envisioning future urban development in the New Plymouth district, it is imperative that we go beyond token gestures and actively weave the tapestry of Te Ao Māori into the very essence of our surroundings. The collaborative engagement of tangata whenua in shaping the physical and cultural landscape ensures a vibrant, inclusive, and culturally rich environment for generations to come.



It is incumbent upon the community to dismantle the barriers to enable tangata whenua to participate in urban development decision making

The enduring impacts of colonisation, ramifications of the raupatu, the confiscation of whenua through the transgressions against Te Tiriti, and the perpetual loss of ancestral lands resonate profoundly within the hearts of iwi and hapū today.

In charting future urban development for the New Plymouth district, it is incumbent upon the community to dismantle the barriers of the past, fostering an environment that empowers the revitalisation of Māori land and the flourishing of papakāinga. This strategic vision must encapsulate not only physical development but also a commitment to redress historical injustices, honouring the values that underpin the enduring connection of tangata whenua to their whenua.

The far-reaching consequences of colonisation, encompassing physical, social, and cultural dimensions, demand a conscientious acknowledgment to pave the way for healing and reconciliation.

In Ngāmotu / New Plymouth district, the scarcity of Māori land stands in stark contrast to the historical abundance. Past policies and barriers, entrenched in district plans and legislative frameworks, have erected formidable obstacles hindering the development and utilisation of Māori and ancestral lands. This historical context underscores the imperative to rectify past injustices and pave the way for a more inclusive, equitable, and collaborative future.

The PDP represents a pivotal juncture, recognising the importance of papakāinga development across various zones in the district, including the Māori Purpose Zone. Papakāinga, reflective of the sacred values of kaitiakitanga, ūkaipōtanga, rangatiratanga, and kotahitanga, emerge as profound expressions of cultural identity. Papakāinga serves as a living testament to these values, showcasing multigenerational living and the potential for harmonious coexistence between tradition and progress.

Using Mātauranga Māori and Māori design principles benefits good urban design outcomes for the whole community

Harnessing Mātauranga Māori and embracing Māori design principles signifies not only good urban design but a harmonious relationship with the entire district, deeply rooted in mana whenua perspectives.

For Māori, urban design transcends physical structures. It intricately weaves together the relationship between buildings and the people who inhabit them, considering the interconnectedness of location, sense of place, and the profound impact on the mauri of the land, waterways, and biodiversity. It is a holistic approach that goes beyond aesthetics, emphasising the restoration and enhancement of the very essence of our environment.

Tangata whenua aspire to actively participate in the ongoing design of the urban environment. This engagement is not only a current desire but a commitment to future collaborations, ensuring that their values, aspirations, and principles are not only acknowledged but integral to the development trajectory. It is a call for recognition and proactive consideration of their enduring relationship with the district.

A shining example of co-design that embodies culturally distinctive expression and exquisite design is Te Hono – New Plymouth Airport. This project goes beyond being infrastructure; it stands as a testament to the unique identity not only of Ngāmotu but of Aotearoa / New Zealand as a whole. It encapsulates the potential for collaborative design that respects and celebrates the cultural richness of the land and its people. However, Mātauranga Māori can be incorporated in all scales of development, including landscaping, subdivision, and land use to provide for culturally distinctive expression and beauty that is unique not only to Ngāmotu, but to Aotearoa / New Zealand.

In envisioning urban development for the New Plymouth district, the integration of Mātauranga Māori and Māori design principles should be at its core. This approach not only fosters good urban design outcomes but ensures a sustainable, culturally enriched, and harmonious district that respects and uplifts the values of mana whenua.



4.2 Pre-draft consultation

In addition to our engagement with tangata whenua, we have consulted with various other parties in preparation of the draft FDS.

Much of the delivery of our district's growth and development comes from our development community, infrastructure providers and particular government organisations such as Kāinga Ora Homes and Communities. These are the people who build our homes and businesses, provide the network utilities and social infrastructure to support those activities that help shape our community.

Using the PDP as a baseline, we have sought feedback from development and technical professionals on how and where the district should grow. We have explored what areas should be prioritised to cater for short, medium and long-term growth, as well as additional areas that might be worthy of consideration. Importantly, this exercise has also helped identify what opportunities and constraints the Councils should be aware of for each growth area based on local "on the ground knowledge" from the people who help build our district. This feedback has informed both our analysis of growth areas, as well as the methods we will use to implement this strategy.

We have also engaged with infrastructure providers and government organisations who have all emphasised the importance of making use of existing urban areas/infrastructure and avoiding ad-hoc development in disconnected or isolated locations. They agree that growth should be accessible to existing centres, amenities, schools, employment and open space reserve areas. Public transport options also need to be taken into account. In particular:

- The New Zealand Transport Agency Waka Kotahi seeks to maintain the efficiency of the state highway network, highlighting that long-term development in Smart Road will require their input;
- Kāinga Ora Homes and Communities are supportive of using Medium Density Zones and centres to increase the number of smaller housing options in locations with established amenities. They are interested in housing affordability, healthy long-term rental options and the need to increase the proportion of accessible housing for disabled people, lower cost accommodation and social housing; and
- The Ministry of Education has advised that the district is supported by a network and variety of educational facilities and recognise the benefits of upgrading existing assets as the district's population increases. [It is also focussed in supporting iwi/hapū/whānau to realise their educational aspirations in the district.](#)

Engagement with these agencies is ongoing and the Councils will continue to work with them to understand and take their views into account, both in finalising and implementing the FDS.

As a network utility provider, NPDC will need to be involved in decision-making on all core growth infrastructure projects and will work alongside developers and other infrastructure providers and government organisations. This will involve structure planning for things like water supply reticulation and upgrades, sewer extensions, pump stations, stormwater treatment, roading extensions, new pathways, land purchase and parks development. TRC also need to be involved in decision making on river catchments, flood management and the provision of and connectivity to public transport.




The method for providing infrastructure varies with the size of the development or growth area. It can be delivered by developers, who then incorporate the cost of development contributions into the sale price of the property, or by the Councils through our Long-Term Plans, with costs recouped via development or financial contributions.



4.4 Constraints on Development

When considering future growth and development capacity, it is important to understand potential constraints on development. All land could contain factors that constrain development to some extent. While some constraints may make any form of development or growth inappropriate, many others can be overcome with appropriate design and planning considerations. This may require additional expertise to explore opportunities or resolve issues, enabling development to occur (albeit at extra cost). The extent to which land is constrained varies based on the quantity and type of constraint present. There are also some gaps in the information we have available on some constraints that may need to be explored in more detail through pre-development scoping work (e.g. mapped wetlands). See the Technical Document for further information.

Table 1 below outlines the main types of constraints there may be on development.

Table 1: Development Constraints

DEVELOPMENT CONSTRAINT	EXPLANATION
<p>Highly Productive Land</p> 	<p>Growth areas should ideally avoid encroaching onto highly productive land. Maintaining access to some of this region's most productive soils is crucial for food production, generating economic gains from exports, providing employment opportunities, and supporting the social wellbeing of our rural communities.</p>
<p>Hazards and Risks</p> 	<p>Natural hazards such as slope instability, fault lines, flooding, and coastal erosion may pose risks to people, property and the environment. Some land is contaminated due to previous use involving hazardous substances. A risk management approach applies to existing development and infrastructure, while a risk reduction (including avoidance where appropriate) approach applies to new development within identified hazard areas. Climate change is expected to increase many types of natural hazard risk over time.</p>
<p>Scheduled Features and Protected Land</p> 	<p>In some localities, development may be considered inappropriate, or need to be carefully managed, because of important values and uses, such as significant natural, historic or cultural environmental values (for example notable trees, sites and areas of significance to Māori and heritage buildings). The presence of scheduled features does not necessarily preclude urban development but may have an impact on housing yield and increase costs. Land protected under the Conservation Act or Reserves Act is not appropriate for urban development.</p>
<p>Infrastructure</p>	<p>Regionally and nationally significant infrastructure such as the National Grid, gas distribution pipelines, the roading network (including state highways) and provision of</p>

DEVELOPMENT CONSTRAINT	EXPLANATION
	<p>public transport must be considered when determining appropriate growth areas and designing subdivisions within them.</p> <p>The location and topography will influence whether the land is able to be feasibly serviced or 'infrastructure ready'.</p>
<p>Reverse Sensitivity and Direct Effects on Infrastructure</p> 	<p>Development may be inappropriate in some localities because of existing lawfully established uses that are not compatible next door to residential living, including highways, industrial activities and intensive farming and the National Grid.</p>

A lack of infrastructure or the need to upgrade infrastructure to cope with more dwellings can constrain development. While some localities are suitable, sometimes topography or ground conditions means that the cost of the infrastructure to service the area can only be realised in the long-term, or in some cases, not at all.

These have been key considerations in the evaluation of growth areas within the PDP as outlined in the scenario testing contained in section 4.5 below. Detailed information on spatial constraints, including maps of the major constraints across the study areas are shown in the [draft](#) FDS supporting Technical Document.

4.5 Spatial Scenarios

The physical growth pattern of the New Plymouth district has been influenced by many factors. Initially Māori, and later European, settlement was influenced by proximity to natural resources (such as the coast, waterbodies and fertile land) and topography. Later, factors like land availability and its capacity to be serviced by infrastructure, demand for affordable housing, and the ease of access to employment, education institutions, community amenities, along with retail and leisure opportunities, have all played a role in our growth story.

The [draft](#) FDS has looked at alternative ways the district may grow and change physically in the future. Understanding these various options for the future shape of the district helps us enable the best pathway forward. This section sets out the alternative spatial scenarios investigated and the learnings that inform the spatial response.

When thinking about the land available for local business needs, economic analysis undertaken as part of the PDP process indicates that the district has sufficient commercial and industrial zoned capacity to accommodate future business land demand over the long-term. Given future business growth of the district is well catered for (including an element of spare capacity), we primarily have looked at the alternative ways in which residential growth in the district can be delivered in the long term.

We have identified, analysed and discounted a number of different spatial scenarios including: further intensification of existing PDP Medium Density Residential Zones; rezoning PDP Rural Lifestyle Zone to General Residential Zone; intensification of rural land and dispersed development (market led in all zones).

For more detail on the alternative spatial scenarios considered, how the targeted spatial scenarios were developed and assessed, and maps showing the boundaries for new growth areas considered, refer to the Technical Document.

Residential growth assumptions and alternative spatial scenarios

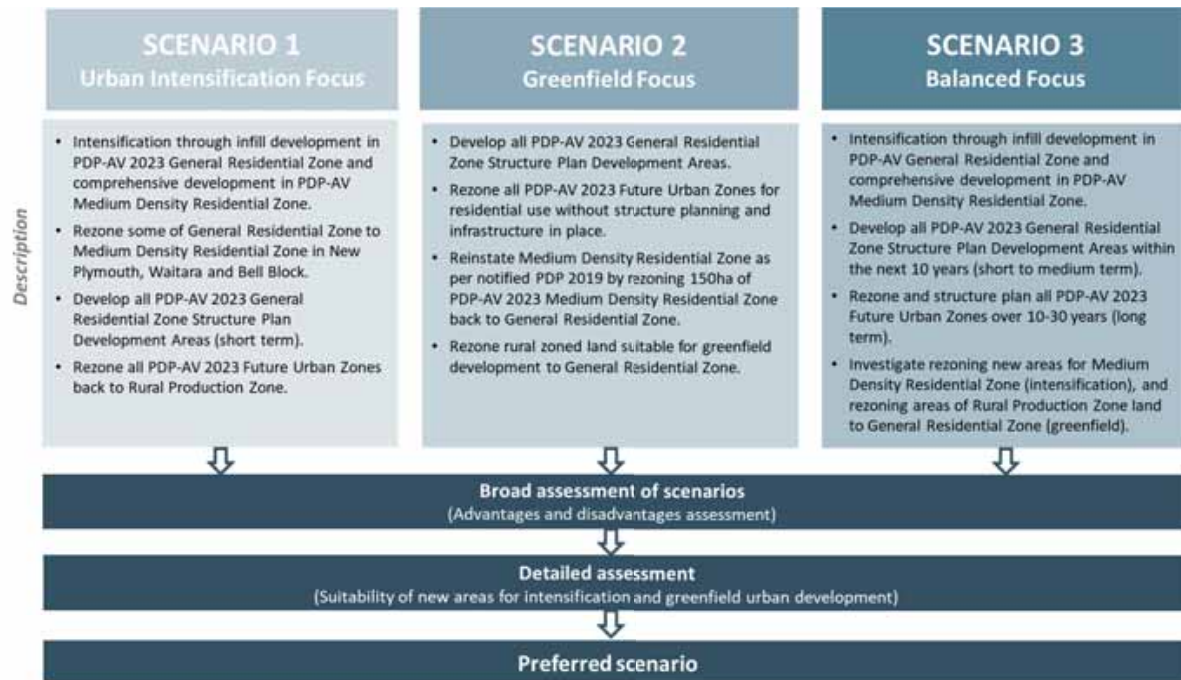
The draft FDS has examined various spatial scenarios to understand the spatial distribution of residential land and how different models might support meeting the district's anticipated demand for housing over the next 30 years.

As required by the NPS-UD, we have considered the advantages and disadvantages of different spatial scenarios and whether they provide sufficient capacity to achieve a well-functioning urban environment and assist in the integration of planning decisions with infrastructure planning and funding decisions. The scenarios assessed include an urban intensification focus, a greenfield focus and a balanced focus. Following consideration of advantages and disadvantages, we have undertaken more detailed assessments of specific areas where land could be included to a preferred scenario, in order to determine their appropriateness for inclusion in the ~~draft~~ FDS. A summary of the scenarios considered, and the process followed for this assessment is outlined within Figure 3.

In developing and assessing the alternative spatial scenarios, the following assumptions have been applied across all scenarios:

- A range of housing typologies will be delivered in line with the PDP Medium Density Residential Zones (e.g. small-scale standalone, terraced and multi-unit developments);
- In time, existing PDP General Residential zoned greenfield areas will be built out and developed at densities consistent with their existing structure plans;
- Undeveloped or vacant parcels of zoned land across the existing urban area of New Plymouth, Inglewood and Waitara will be developed over the next 30 years in line with the planned character of the PDP General Residential Zone; and
- Projected business demand can be catered for in existing zoned commercial / industrial areas.

Figure 3: Summary of Scenarios Considered and Process for Assessment



(Retain Scenario 3 – Balanced Focus,.)

For a full description of the other growth scenarios used for the consultation of the draft FDS 2024-2054, refer to our FDS Supporting Technical Document. This document provided the background and analysis undertaken in preparing the draft FDS.

(Move the remainder of section to the FDS Technical Document)

Spatial Scenario 1: Urban Intensification Focus

This scenario tests the concept of providing for future residential growth in existing urban areas through significant amounts of intensification. It would remove the Future Urban Zone from the growth strategy and would instead, heavily rely on intensification to provide for long term growth.

In terms of spatial distribution, this scenario would adopt the 417ha of intensification potential created through the PDP rezoning of medium density areas but would also 'upzone' land in New Plymouth, Bell Block and Waitara from General Residential Zone to Medium Density Residential Zone. The intensification areas are located to provide good access to amenities, education, employment and transport options. The existing bulk and location provisions in the Medium Density Residential Zone would apply which enable up to three residential units as of right.

Intensification is the process of building more homes within existing urban areas. It would seek to encourage and enable more housing to be created through the replacement or adaptation of existing

~~buildings or through more well-managed development of underutilised land. A by-product of this approach can be a lessening of the need to expand development into rural areas that can be important for their productive capacity and other values.~~

~~The intensification of these urban areas would range from smaller scale infill such as minor units/additional units on an existing site or within existing buildings, to attached housing developments in existing neighbourhoods, and more comprehensive apartment developments on larger sites.~~



~~The advantages of this scenario would be:~~

- ~~• Existing infrastructure is in place, or for Structure Plan Development Areas NPDC has a programme of work to provide infrastructure within the next ten years;⁹~~
- ~~• Increased opportunities for infill development capacity in the short to medium term;~~
- ~~• Accessibility and a reduction in the vehicle kilometres travelled;~~
- ~~• Reduced urban sprawl;~~
- ~~• Retention of highly productive land; and~~
- ~~• Uses existing business land and reinforces the role and function of our existing city, town and local centres, along with commercial and industrial areas.~~



~~The disadvantages of this scenario would be:~~

- ~~• Not likely to provide sufficient housing capacity;~~
- ~~• Does not provide for housing choice over the long term (may lead to an oversupply of semi-detached homes and apartments and not enough standalone dwellings to meet demand);~~
- ~~• Smaller lot sizes may compromise the ability to provide for infill and inter-generational living arrangements;~~
- ~~• Potential to result in higher residential land values;¹⁰~~
- ~~• Not all new urban areas are easily accessible to existing centres, service amenities, schools, employment, open space reserve areas, etc. or serviced by regular public transport options;~~
- ~~• Existing infrastructure may need to be upgraded to cope with increased intensification; and~~
- ~~• Relies on a high number of landowners undertaking infill development, which in the district is currently a less-utilised model.~~

Spatial Scenario 2: Greenfield Focus

~~This scenario tests the concept of providing significant portions of the district's residential growth within greenfield land and the PDP Future Urban Zones.~~

⁹ Note: Upgrades and capital expenditure would be required to support infill and intensification
¹⁰ See paras 10.5-10.6 Property Economics, [Hearing 22 s42A Report Rezoning Overview Report Appendix 5 Tim Heath Statement of Evidence](#)

~~This scenario would adopt the greenfield availability of the PDP but increase the amount of greenfield land in the district by rezoning additional land from Rural Production Zone to General Residential Zone. It would also rezone the existing Future Urban Zones to have them zoned general residential immediately. The existing bulk and location provisions in the General Residential Zone would apply.~~

~~Intensification available through the Medium Density Residential Zoning would revert back to the extent contained within the notified version of the PDP (2019) – a land area of 266ha. This would mean that the additional 150ha of Medium Density Residential Zoned land contained in the PDP AV (Proposed District Plan Appeal Version 2023), would revert to General Residential Zoned land. The locations of medium density areas would be focused more closely around the city centre and local and town centres.~~

~~Using areas identified by the development and technical professionals community as part of the pre-draft consultation on this draft FDS, we have tested the suitability of the following additional areas for greenfield growth:~~

~~Carrington North, Carrington South, Bell Block North, Bell Block South, Inglewood South West, Inglewood South East, Waitara West, Waitara South West, Waitara South East, Lepperton South West, Lepperton South East and Urenui West.~~



~~**The advantages of this scenario would be:**~~

- ~~• Provides sufficient housing capacity;~~
- ~~• Potential to reduce overall residential land values;~~
- ~~• Increased ‘ease’ of development i.e. familiarity for development community in this type of development model;~~
- ~~• Typology and locational choice; and~~
- ~~• Further land for large-scale development models.~~



~~**The disadvantages of this scenario would be:**~~

- ~~• Not all areas are easily accessible to existing centres, service amenities, schools, employment, open space reserve areas etc or currently serviced by regular public transport options and further sprawl may hamstring future provision;~~
- ~~• Reduction of feasibility rates for urban intensification, given the perceived comparative ease and lower costs associated with greenfield development, meaning these development opportunities will typically be pursued first;¹¹~~
- ~~• Would be inefficient in relation to providing affordable infrastructure. Council would need to extend and upgrade water and wastewater infrastructure and transport networks to Future Urban-zoned land within the next ten years. Currently Council has only fully investigated and allocated funding for 3 water infrastructure for PDP AV Structure Plan Development Areas which provide growth in the short to medium term (in the 10 years);~~

¹¹ See paras 10.6-10.10 Property Economics, [Hearing 22 s42A Report Rezoning Overview Report Appendix 5 Tim Heath Statement of Evidence](#)

- ~~Would not enable meaningful engagement and consultation with tangata whenua as structure planning processes are not undertaken;~~
- ~~Would encourage urban sprawl;~~
- ~~Limits the ability to undertake necessary investigations that would ordinarily be part of a structure planning programme; and~~
- ~~Reduction in land available for food production, economic gains from exports, employment opportunities and social wellbeing of rural communities.~~

Spatial Scenario 3: Balanced Focus

~~This scenario tests the concept the providing for the district's growth through a combination of relatively large areas of medium density residential zoning and the more intensive housing options associated with this, while also providing for greenfield expansion in a staged and focused way.~~

~~This scenario would retain the extent of the medium density and greenfield availability of the PDP. It would also retain the Future Urban Zones, as long-term options for growth. The existing bulk and location provisions in these zones would apply.~~

~~In addition to these existing areas, this scenario would consider the possible additional sites for both intensification and greenfield growth described within Scenarios 1 and 2.~~



~~The advantages of this scenario would be:~~

- ~~Provides sufficient housing capacity;~~
- ~~Potential to reduce overall residential land values;~~
- ~~Increased certainty of growth accommodation;~~
- ~~Provision of residential and business capacity required over the long term;~~
- ~~Existing infrastructure is in place in PDP Residential, Commercial and Industrial Zones;~~
- ~~Increased opportunities for infill development capacity in the short to medium term;~~
- ~~Increased flexibility in the market by providing for a range of housing types;~~
- ~~Accessibility and a reduction in the vehicle kilometres travelled;~~
- ~~Reduced urban sprawl;~~
- ~~Retention of highly productive land;~~
- ~~Further land for large scale development models;~~
- ~~Typology and locational choice;~~
- ~~Improved market competitiveness (as directed by the NPS-UD);~~
- ~~Staged development with developing of PDP AV Structure Plan Development Areas in the short to medium term and then Future Urban Zoned land in the long term;~~
- ~~Enables the Council to investigate and fund infrastructure for new growth in a timely manner; and~~
- ~~Structure planning of Future Urban Zoned land enables engagement and consultation with tangata whenua and for scheduled and non-scheduled values to be protected and managed.~~






The disadvantages of this scenario would be:

- Reliance on existing or older infrastructure until such time as it is upgraded;
- Not all urban areas are easily accessible to existing centres, service amenities, schools, employment, open space reserve areas etc or serviced by regular public transport options;
- Potential reduction of feasibility rates for urban intensification given the abundant available supply of greenfield land and the perceived comparative ease and lower costs associated with greenfield development, meaning these development opportunities will typically be pursued first;
- Council would need to extend water and wastewater infrastructure to meet PDP subdivision requirements (i.e. all new allotments must be provided with a piped connection at the boundary to the Council’s urban reticulated water and sewerage system); and
- Some urban sprawl.




4.6 Evaluation Criteria for New Intensification and Greenfield Areas

To help us consider the additional targeted growth sites, we have compiled a set of evaluation criteria. These criteria have been used to assess whether an area is suitable for residential growth. These criteria are outlined in Table 2 below. The areas of land assessed and included through the PDP AV have not been assessed again through this process. The submissions and associated hearings relating to the PDP AV allowed for a detailed assessment of the land use of the areas and the appropriateness of the zoning and as such, have not been considered again here.

Table 2: Evaluation Criteria Used to Assess Areas Within Each Scenario

CATEGORY	MATTERS FOR CONSIDERATION	FEATURE
	Area is generally at a gradient that enables development	Contours
	Areas which are located on Land Use Capability Class 1, 2 or 3 land and are zoned Rural Production under the PDP are generally not appropriate for urban development	Land use capability classes
	Coastal environments (including the coastal marine area), wetlands, and lakes and rivers and their margins are less favourable for growth	Coastal environment
		Wetlands
		Lakes
		Rivers
	Outstanding natural features and landscapes will be avoided	Waterbody catchment
		Natural features and landscapes
	Public access to and along the coastal marine area, lakes and rivers will be maintained and enhanced, along with strategic public access	Outstanding natural character
		Public access corridors




CATEGORY	MATTERS FOR CONSIDERATION	FEATURE
	<p>corridors (coastal walkways, Taranaki Traverse, shared pathways, esplanade strips, esplanade reserves, access strips and access links)</p> <p>Significant indigenous vegetation and significant habitats of indigenous fauna should be avoided</p> <p>Effects on waahi tapu sites and other taonga should be carefully managed</p> <p>Effects on historic heritage should be carefully managed</p>	<p>Significant natural areas (SNAs)</p> <p>Conservation covenants</p> <p>Sites and areas of significance to Māori</p> <p>Historic places (Category 1 and 2), historic areas, wāhi tūpuna, wāhi tapu, wāhi tapu area</p> <p>Heritage buildings, items and character areas</p> <p>Historic places (Category 1 and 2), historic areas</p> <p>Archaeological sites</p> <p>Notable trees</p>
<p>Hazards and Risks</p> 	<p>The risks associated with natural hazards and their impact on people, property and the environment are carefully managed</p> <p>People and property will not be exposed to hazardous substances</p>	<p>Volcanic eruption</p> <p>Earthquake fault line</p> <p>Coastal erosion</p> <p>Coastal flooding</p> <p>Flood detention area/spillway</p> <p>Flood plain</p> <p>Stormwater flooding</p> <p>Liquefaction</p> <p>Significant hazardous facilities</p>
<p>Infrastructure</p> 	<p>Area is serviced with water infrastructure which meets current levels of service, or it is available at the boundary</p> <p>Area is serviced with stormwater infrastructure which meets current levels of service, or it is available at the boundary</p> <p>Area is serviced with wastewater infrastructure which meets current levels of service, or it is available at the boundary</p> <p>Area is serviced or can reasonably be serviced with multiple forms of transport infrastructure (including private vehicles, public transport, walking and cycling)</p> <p>Area has access within reasonable driving distance to social infrastructure, including educational facilities, health facilities, community facilities and public open space (this may not be within the area itself)</p> <p>Area has access within reasonable walking distance to a local centre providing a variety of convenience-based goods and services for everyday needs (this may not be within the area</p>	<p>Water infrastructure</p> <p>Stormwater infrastructure</p> <p>Wastewater infrastructure</p> <p>Transport infrastructure</p> <p>Social infrastructure</p> <p>Local centre</p>

CATEGORY	MATTERS FOR CONSIDERATION	FEATURE
	<p>itself), or a local centre can be planned for in a structure plan</p> <p>Area will not impede infrastructure that is significant at a national, regional or district level</p>	<p>Gas transmission pipeline</p> <p>National grid</p> <p>Airport</p> <p>Port</p> <p>Designations (includes railway corridors and state highways)</p>
<p>Contiguous Zoning</p> 	<p>Area will be consistent with surrounding land uses and not result in spot/ad hoc zoning</p>	<p>Zoning</p>
<p>Reverse Sensitivity</p> 	<p>New residential and business land uses will not compromise the operation of lawfully established primary production activities which generate effects such as dust, odour, traffic and noise</p>	<p>Lawfully established activities including can include energy activities, quarries, pig farms and poultry farms</p>
<p>Tangata Whenua</p> 	<p>Development will enable tangata whenua to protect, develop and use their ancestral land in a way which is consistent with their culture and traditions and their social, cultural and economic aspirations</p>	<p>Papakāinga</p>

More detail on how the evaluation criteria was developed and applied is contained within the Technical Document.

Summary of Possible New Growth Area Evaluation

Each criterion for each area within a scenario was allocated one of the following colours:-



	Aligns with the matter for consideration
	Somewhat aligns with the matter for consideration
	Does not align with the matter for consideration

The results of the assessment against the evaluation criteria are broadly summarised in terms of possible new intensification and greenfield areas below in Table 3. The colour allocated for each category is a summary of all features assessed for all areas within the areas.

Table 3: Summary of Possible New Growth Areas Against Evaluation Criteria

CATEGORY	NEW URBAN AREAS	NEW GREEN-FIELD AREAS	EXPLANATION
Landform 	-	-	The district is located between Taranaki Maunga and the Tasman Sea meaning that rivers flow from the top of the mountain down the valleys to the sea. Therefore it is common for areas within all scenarios to have undulating landscapes. It is particularly noticeable in western areas of the Urban Intensification Focus scenario, such as Spotswood, Blagdon and Lynmouth. Almost all areas in all scenarios are considered developable, except for Lower Vogeltown in the Urban Intensification Focus scenario which has a steep gully.
Highly Productive Land 	-	-	Land classed as LUC 1, 2 or 3 (meaning it is highly productive under the NPS HPL) is not deemed highly productive if it is not already zoned as general rural production in the PDP. This means that all areas within the Urban Intensification Focus scenario are favourable because they are already zoned General Residential Zone. However, the requirement to protect highly productive land under the NPS HPL presents an obstacle for developing areas within the Greenfield Focus scenario because all areas are partially or entirely classed as LUC1, 2 or 3, or are a mix of LUC1, 2 or 3. To enable the areas within this scenario to be developed, they would need to meet the matters listed in Clause 3.6 of the NPS HPL.
Scheduled Features and Protected Land 	-	-	All scenarios have areas containing scheduled features and protected land except for Lynmouth and Whalers Gate (Urban Intensification Focus scenario) and Waitara South West (Greenfield Focus scenario). Archaeological sites and sites and areas of significance to Māori are prominent in areas within the Urban Intensification Focus scenario. Many areas contain rivers, which is expected given our district's location between Taranaki Maunga and the Tasman Sea. However, rivers aside, there are no scheduled features and protected land located within several areas in the Greenfield Focus scenario (Inglewood South West, Inglewood South East and Waitara West) and the Greenfield Focus scenario (Lepperton South West and Lepperton South East).
Hazards and Risks 	-	-	Stormwater flooding areas feature highly in this category, being present in almost all areas within the Urban Intensification Focus scenario. Waitara (Urban Intensification Focus scenario) is particularly impacted by the volcanic hazard, coastal flooding and flood plain overlays. In addition, Smart Road's Future Urban Zone (Greenfield Focus) has an existing flood protection scheme in place nearby. However, the flood protection scheme associated with the Mangaone Stream is currently operating at its maximum capacity for river flooding. Therefore, any new development in Smart Road will require further investigations and planning to ensure the flood protection provided by the Mangaone scheme continues to be effective.
Infrastructure	-	-	All areas within the Urban Intensification Focus scenario are serviced by infrastructure. Some existing urban areas have known infrastructure

CATEGORY	NEW URBAN AREAS	NEW GREEN-FIELD AREAS	EXPLANATION
			<p>issues, including that the Inglewood and Waitara wastewater networks are experiencing overflows of raw sewage during heavy rain events. There is capacity in the water supply network in all existing urban areas apart from the areas east of the Waiwhakaiho River (Bell Block and Waitara). Under the Greenfield Focus scenario, some areas have some infrastructure available at the boundary. Of note, Bell Block South does not have wastewater infrastructure or a water supply with capacity nearby. If the Greenfield Focus scenario is developed, upgraded or new infrastructure will be required. Critically, in terms of developing well-functioning urban environments as required by the NPS-UD, some existing urban areas do not have access within reasonable walking distance to a local centre. These include Lynmouth and Strandon (Urban Intensification Focus scenario.). It is noted that the National Grid does run across Upper Vogeltown and this is a matter to consider for Carrington North and Carrington South (Greenfield Focus scenario). A significant resource management issue in the district and across New Zealand is inappropriate development, land use and subdivision in close proximity to the National Grid, which can compromise its operation, maintenance, development and upgrade. Under the NPSET, policies and plans must include provisions to protect the National Grid from other activities. Specifically, the NPSET requires that district plans include a buffer corridor around National Grid lines within which “sensitive” activities should not be given resource consent and other activities that have the potential to compromise the National Grid or generate reverse sensitivity effects are managed. The three primary reasons for restricting activities within the buffer corridor are electrical risk; annoyance caused by transmission lines and reverse sensitivity; and restrictions on the ability for Transpower to access, maintain, upgrade and develop the lines, as well as compromising the assets themselves. Policies 10 and 11 of the NPSET provide the primary direction on the management of adverse effects of subdivision, land use and development activities on the National Grid, and act as the primary guide to inform how adverse effects on the National Grid are to be managed through planning provisions. The policies are directive in nature. The NPDC PDP includes objectives, policies and rules that strictly regulates residential activities and use within a National Grid Yard (12m from the centreline of a transmission line and it’s support structures) and a wider National Grid Subdivision Corridor.</p>
<p>Contiguous Zoning</p> 			<p>If rezoned, almost all areas in both scenarios would be contiguous with existing zoning. The Urban Intensification Focus scenario is particularly favourable because it upzones existing residentially zoned land to Medium-Density Residential Zone. However, there is a notable exception within the Greenfield Focus scenario. If rezoned as General Residential Zone, Bell Block South is adjacent to the existing General Industrial Zone in the north east and to two Future Urban Zones in the north which could be rezoned as General Industrial Zone. Enabling residential development next to the existing General Industrial Zone in the north east is of</p>

CATEGORY	NEW URBAN AREAS	NEW GREEN-FIELD AREAS	EXPLANATION
			particular concern given that the industrial activities operating there are heavy in nature and can create adverse effects such as noise, odour, dust, fumes and smoke.
Reverse Sensitivity 			There are likely to be no issues with reverse sensitivity in the areas within the Urban Intensification Focus scenario because they are already zoned for residential activities and there are no energy activities, quarries, pig and poultry farms present. There are several poultry farms within or nearby Bell Block South, Waitara West, Lepperton South West and Lepperton South East (Greenfield Focus scenario).
Tangata Whenua 			Depending on the type and scale of development, some areas in both scenarios may require consultation and engagement with tangata whenua to enable their consideration of the social, cultural and economic matters to inform decision making. Land zoned for Māori Purpose Zone and papakāinga developments are also another way in which tangata whenua are able to protect, develop and use their ancestral land in a way which is consistent with their culture and traditions and their social, cultural and economic aspirations.

4.7 Discussion on Additional Growth Options

Noting that the PDP already provides sufficient land for long term housing and business needs, we do consider that some of the additional growth areas identified have merit for residential growth and could assist in achieving the outcomes sought through the FDS. The merits of these areas are discussed below.

Urban Intensification

The potential new urban intensification areas are most aligned with the FDS outcomes. In particular, they would meet the following outcomes:-

- Increases the variety of housing types, sizes and tenures, including papakāinga, across the district in quality living environments to meet the community's diverse cultural, social, and economic housing and well-being needs;
- Supports an urban environment that is resilient to the likely current and future effects of natural hazards including climate change;
- Promotes an urban form that supports reductions in greenhouse gas emissions;
- Maintains and utilises a hierarchy of vibrant and viable centres that are the location for shopping, leisure, cultural, entertainment, residential and social interaction experiences. These centres cater to the community's employment and economic needs;

- Reinforces a compact urban environment, where people can access jobs, services, education and open space; and
- Protects highly productive land from inappropriate urban development.

The primary constraint impacting the suitability of urban intensification in urban areas is topography (especially steep slopes). Other considerations include the location of land in proximity to a local centre, supermarket or store and the risks of developing in areas subject to natural hazards. Noting this, the following areas appear favorable:

Areas with a generally flat gradient:

- Upper Westown;
- Brooklands; and
- Bell Block.

Areas with a generally medium gradient:

- Blagdon; and
- Frankleigh Park.

Further analysis is needed to determine if the intensification of these areas would require any further three water infrastructure or transport upgrades, including the consideration of public transport upgrades. Infrastructure issues relating to Three Waters have been identified for several areas. However, it is possible these can be addressed via engineering solutions.

Greenfield

As stated earlier, additional areas of rural greenfield land that maybe suitable for urban development were suggested by developers and technical professionals. Generally, the least constrained greenfield sites are those located close to established urban areas which are serviced by public transport, near centres and close to existing three waters infrastructure.

The following discussion provides a summary of our findings:

Lepperton South West and South East and Urenui West

Providing more residential development in these rural settlements aligns with the FDS outcome of providing a variety of housing types, sizes and tenures, including papakāinga, across the district and helps to meet the community's diverse cultural, social, and economic housing and wellbeing needs.

However, development of these areas would not meet the following FDS outcomes:

- Urban form that supports reductions in greenhouse gas emissions;
- A compact urban environment where people can access jobs, services, education and open space; and

- ~~Protection of highly productive land from inappropriate urban development.~~

~~Council has purchased land to develop a wastewater treatment plan for Urenui, however on the whole the remaining areas are not serviced by either existing wastewater infrastructure or public transport. In particular, the lack of access to public transport means Urenui and Lepperton residents who work in Waitara, Bell Block or New Plymouth are reliant on personal vehicles. We have also heard through our pre-draft consultation that there is not a strong demand for working age residents and families to reside in Urenui. In addition, the development of land in Lepperton South West and South East is constrained by LUC 1, 2 and 3 land and the existence of poultry farming operations. The PDP requires a resource consent for the establishment of a new residential unit within 400 metres of an existing poultry farm.~~

~~Waitara and Inglewood Greenfield Areas~~

~~The development of these areas would meet the following FDS outcomes:-~~

- ~~Promotes an urban environment that is resilient to the likely current and future effects of natural hazards including climate change;~~
- ~~Supports an urban form that supports reductions in greenhouse gas emissions;~~
- ~~Maintains and utilises a hierarchy of vibrant and viable centres that are the location for shopping, leisure, cultural, entertainment, residential and social interaction experiences. These centres cater to the community's employment and economic needs; and~~
- ~~Maintains a compact urban environment, where people can access jobs, services, education and open space.~~

~~-~~

~~However, it fails to meet the following FDS outcomes:-~~

~~-~~

- ~~Infrastructure is planned, funded and delivered to integrate with growth and existing infrastructure is used efficiently to support growth; and~~
- ~~Protection of highly productive land from inappropriate urban development.~~

~~As outlined in the Council's Infrastructure Strategy 2021-2051 Waitara and Inglewood are experiencing significant stormwater and wastewater infrastructure problems.~~

~~Based on the current level of growth as provided for under the PDP, the Inglewood oxidation ponds and pump stations require upgrades to prevent discharges of untreated sewage during high rainfall events. Upgrades are also required to the sewage pumping system in Waitara to eliminate the need for the emergency sewage outfall pipe. Waitara township is experiencing on-going flooding issues. Some land located in the southern catchments of Inglewood which is identified for residential urban development is prone to flooding due to overland flow from the rural portions of the catchments.~~

~~Additional growth within the areas identified surrounding Waitara and Inglewood is expected to exacerbate these existing problems. For both the Waitara and Inglewood greenfield sites identified in this scenario the provision of three waters infrastructure has not been investigated. In particular, the impact of intensification on the current wastewater and stormwater systems, including planned and funded upgrades would need to be modelled and costed.~~

In addition, the majority of the land located in Waitara West and Waitara East is LUC Class 1 land, while the majority of land located in Inglewood South West and South East is LUC Class 3 land.

In the case of Waitara, existing natural hazards (flooding and liquefaction) may make residential infill development more costly in Waitara. Council is currently developing a spatial plan for the Waitara which will explore whether there is a need to rezone further land outside of the existing hazard areas to meet the demand for housing. Under clause 3.6(1) of the NPS HPL the Council may allow the urban rezoning of highly productive land if there are no other reasonably practicable and feasible options for providing at least sufficient development capacity within the same locality and market while achieving a well-functioning urban environment.

Carrington South and Carrington North

The development of these areas would meet the following FDS outcomes:

- Supports an urban environment that is resilient to the likely current and future effects of natural hazards including climate change;
- Maintains and utilises a hierarchy of vibrant and viable centres that are the location for shopping, leisure, cultural, entertainment, residential, and social interaction experiences. These centres cater to the community's employment and economic needs; and
- Maintains a compact urban environment, where people can access jobs, services, education and open space.

While sited on the edge of New Plymouth's urban environment they are currently not serviced by any three waters infrastructure. Both areas are surrounded by an area of land zoned rural lifestyle.

While these areas are free of known natural hazards, both sites are constrained by having a medium slope gradient and the presence of the national grid, which runs through both sites. Further work is needed to understand the reverse sensitivity effects on the national grid. A significant resource management issue in New Plymouth and across New Zealand is inappropriate development, land use and subdivision in close proximity to the National Grid, which can compromise its operation, maintenance, development and upgrade. Under the NPSET, policies and plans must include provisions to protect the National Grid from other activities. Specifically, the NPSET requires that district plans include a buffer corridor around National Grid lines within which "sensitive" activities should not be given resource consent and other activities that have the potential to compromise the National Grid or generate reverse sensitivity effects are managed. This policy direction has directly informed the assessment of the National Grid as a strategic infrastructure constraint.

Bell Block South and Bell Block North

The development of these areas would meet the following FDS outcomes:

- The district has a hierarchy of vibrant and viable centres that are the location for shopping, leisure, cultural, entertainment, residential and social interaction experiences. These centres cater to the community's employment and economic needs; and

- ~~The district develops as a compact urban environment, where people can access jobs, services, education and open space.~~

~~However, these areas are less favourable for development due to several other constraints as described below.~~

~~Bell Block North is subject to coastal erosion, stormwater flooding and liquefaction, as well as being located on highly productive land. While Bell Block South is located on highly productive land (a mixture of LUC Class 1, LUC Class 2 and LUC Class 3 land) and is not serviced by wastewater infrastructure. Additionally, Bell Block South is located next to the General Industrial Zone (which is particularly heavy on the eastern side) and there are existing poultry farms nearby.~~

~~-~~
Summary of desirability of the spatial scenarios and additional growth areas
~~-~~

~~Our analysis shows that both Scenarios 1 and 2 have advantages and disadvantages, but that neither scenario is appropriate on its own and that a balanced approach to growth is most appropriate way to achieve a well-functioning urban environment. In particular, this analysis has highlighted:~~

- ~~The urban intensification Scenario 1 is the most favourable when assessed against the draft FDS outcomes, however this approach alone does not provide housing choice (e.g. a variety of houses in different locations which cater for the living requirements of both smaller and larger households).~~
- ~~Infrastructure and reverse sensitivity constraints are significant considerations in Scenario 2, particularly when considering the high cost of servicing greenfield areas with infrastructure.~~
- ~~Scenario 2 would also not enable meaningful engagement and consultation with tangata whenua in the design and release of additional greenfield land.~~
- ~~Both Scenario 1 and 2 carry social and infrastructure implications that would require significant reprioritisation for infrastructure providers and additional engagement processes.~~
- ~~Some of the new areas for intensification considered under Scenario 1 have merit. Further investigation is required to better understand the desirability of rezoning all or part of Upper Westown, Brooklands, Bell Block, Blagdon and Frankleigh Park from General Residential Zone to Medium Density Residential Zone. More in-depth economic and infrastructure modelling is also required.~~
- ~~While some greenfield rural areas considered under Scenario 2 offer connectivity benefits, almost all areas of greenfield rural land are not favourable for urban development due to being identified as highly productive land. Given the PDP has land zoned for residential and business needs for the next 30 years, rezoning of further greenfield rural land cannot be justified without further investigation at this point in time.~~
- ~~The only exception in Scenario 2 is Carrington North and Carrington South. These greenfield rural areas show potential as they are not identified as highly productive land, but further feasibility analysis is required to understand any reverse sensitivity and direct impacts on the Nnational Ggrid, as well as factors like slope, three water infrastructure and potential yield considerations.~~

- ~~Other greenfield rural areas (that are identified as highly productive land) in Scenario 2 may warrant further investigation for long term growth potential, subject to other strategic planning process (i.e. spatial planning), monitoring and review of land supply.~~

4.7 Preferred Spatial Scenario

~~Given the above,~~ Scenario 3 – Balanced Focus ~~is the Councils was generally supported by submitters on the FDS and is the~~ preferred scenario for managing future growth and the development capacity required to meet community needs in the district. It will provide opportunities for intensification and the benefits associated with this approach, while also allowing for flexibility and choice in the market through greenfield development.

This means enabling intensification in appropriate locations near amenities, along key transport routes etc. while providing greenfield expansion in a staged way which can be efficiently serviced by infrastructure.

Scenario 3 promotes:

- More intensive housing concentrated in and around the city centre, town centres, local centres, and key transport routes and amenities;
- More infill housing development located throughout the district;
- Greenfield residential development on undeveloped residential land and new residential communities on the fringes of existing urban environments; and
- The consolidation of commercial, community and industrial activities within existing commercial and industrial areas.

In relation to the suggested rural greenfield areas to be considered for urban development (beyond what is already zoned through the PDP), based on the information we currently have available, there is no sound justification to include any of the areas assessed. The HBCA 2024 has indicated that the PDP has a sufficient supply of residential land available to meet projected demand. As such, it is considered inappropriate to identify new areas for either intensification or additional greenfield through this strategy at this time.

However, as our analysis has shown that greenfield rural areas (that are identified as highly productive land) in Scenario 2 may warrant further investigation for long term growth potential, subject to monitoring and review of land supply. Therefore these area have been included in the draft Implementation Plan contained within Section 6.

In implementing this strategy, further consideration will be given to possible growth areas identified.

The existing Future Urban Zones still play a clear role in the future provision of residential land in the district. However, it is also apparent that these areas are not needed in the short-term and that there are significant advantages associated with delaying the development of these areas, particularly given the

high cost of providing infrastructure to these areas and further investigations needed. At this stage it is most appropriate to consider the size, make-up and timing of these areas.

5. Our Growth Strategy

Residential Growth

Our growth strategy, which includes the zoning included in the PDP, provides for a balanced approach, through both intensification in appropriate locations as well as greenfield development opportunities. These areas will provide the number and variety of new houses we need to meet the demand over the short, medium, and long term.

The ~~draft~~ FDS promotes:

- A combination of residential and commercial activities within the city centre, as well as town and local centres;
- More intensive urban form and housing to be concentrated within and around the city centre;
- More intensified housing across New Plymouth and surrounding townships in areas with good access to centres, transport options and services;
- Greenfield growth in areas close to the existing urban areas. These areas are natural extensions to our existing transport networks and infrastructure;
- Residential development through infill within existing neighbourhoods and undeveloped residential land; and
- Commercial, business and industry activities to grow within our existing commercial and industrial zoned areas.

To do this, we will take a balanced two-pronged approach. Growth will be provided through a combination of geographic areas, which in themselves provide for varying housing typologies and densities. These can broadly be described as infill and undeveloped residential land, structure plan development areas, future urban areas and existing centres. Table 4 below outlines the indicative timing for the development of these areas.

Table 4: Indicative Timing for Growth Areas

Short / medium term	Infill	Five Structure Plan Development Areas				Undeveloped Residential Land		
	Medium Density Residential Zones General Residential Zones	Patterson Puketapu Carrington Junction Johnston				New Plymouth Inglewood Waitara		
Long term	Future Urban Zones Smart Road Area R Frankley Cowling Oakura South and West Waitara East and Ranfurly Oropuriri Junction							

A compact city footprint offers a range of benefits for people, including easier access to goods and services, greater housing choices and lower long-term infrastructure costs. It also provides more opportunities to move towards a more carbon neutral urban environment, while protecting productive land.

The development capacity and the infrastructure required to support this approach is discussed within the following sections.

Infill and Undeveloped Residential Land

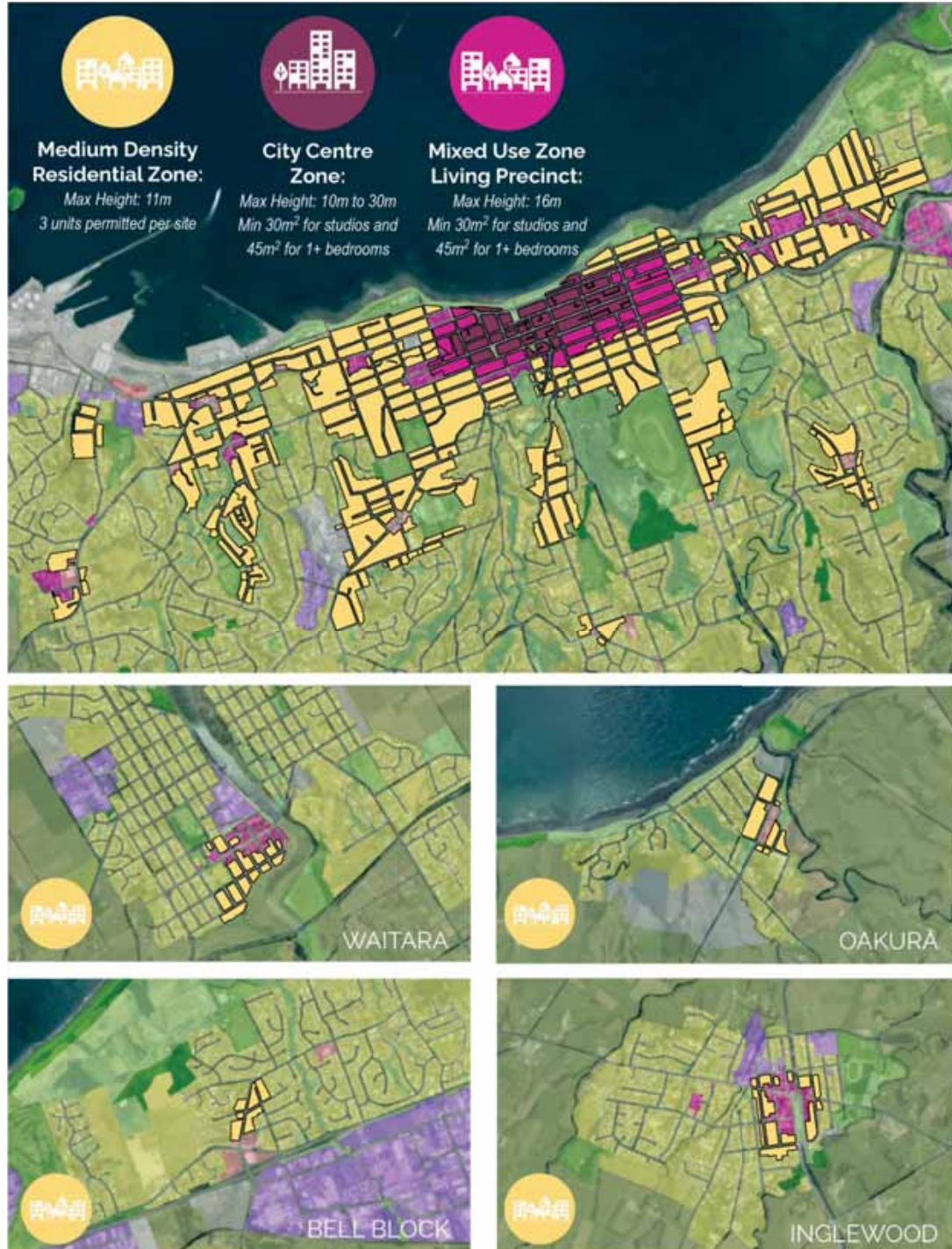
Infill and Intensification

A key part of our growth strategy will be to make use of our existing urban environments through encouraging and enabling infill and intensification via the PDP General Residential and Medium Density Residential Zones. Residential infill development is the establishment of new dwellings within existing residential areas and is facilitated by the division of existing residential properties into smaller sections or using sites for multiple dwellings. Infill includes development where:

- The existing house is retained and an extra dwelling/s is added;
- The existing house is removed and the entire site is used for an extra dwelling/s; and
- Comprehensive redevelopment where the existing house is removed and the entire site is redeveloped typically for multi-unit developments.

The FDS supports increased infill development up to two stories with the General Residential Zone. A greater level of residential infill development will be provided in the Medium Density Residential Zone, supported by the PDP provisions that enable and support comprehensive multi unit developments. Other options for intensification are enabled in the city, town and local centres. Figure 4 below illustrates the location of key zones that provide for intensification.

Figure 4: Location of Key Zones that Provide for Intensification



Medium density housing is typically underutilised within the district, where more traditional, detached housing typologies predominate.

The provision of land suitable for intensification (e.g. through the PDP Medium Density Residential Zone) may not lead to these areas developing in a way that achieves a well-functioning urban environment. ~~Predraft~~ FDS feedback has indicated that certain priority areas (for example Westown in New Plymouth) should be identified, and more detailed spatial planning of these areas undertaken. We support future work in this space as we agree the Councils will need to play a role in encouraging and incentivising further residential intensification and complementary business activities. This would provide additional certainty and direction to landowners and the community on how we will grow over the medium to long term.

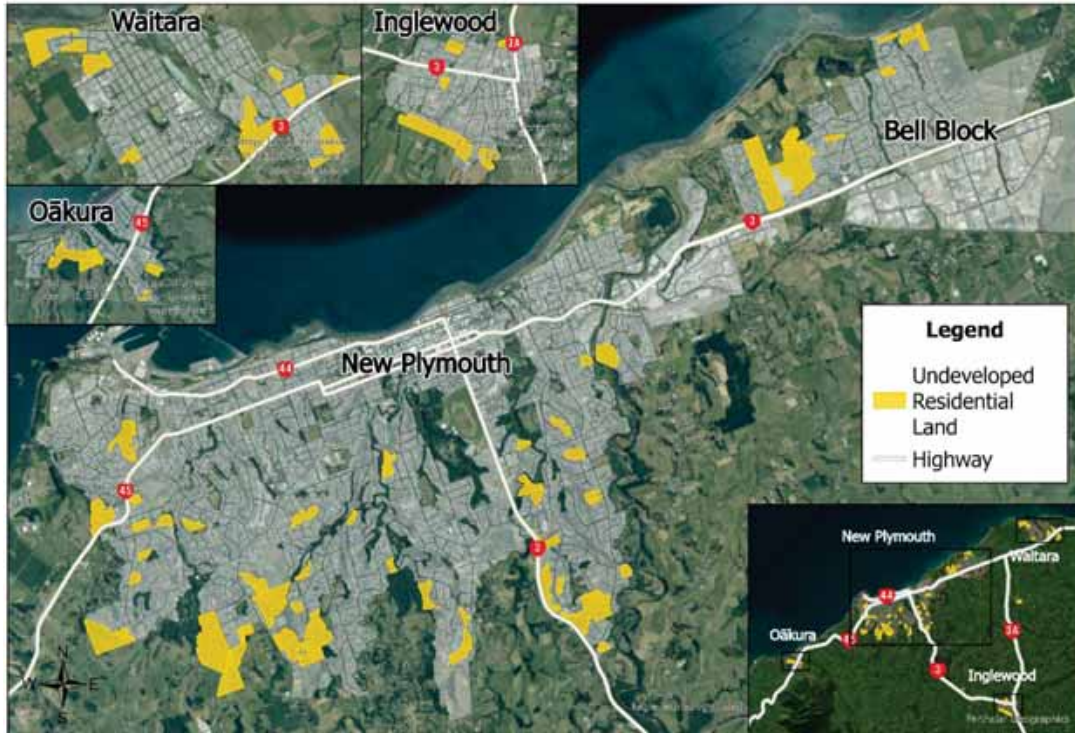
Undeveloped Residential Land

In addition to this intensification, undeveloped residential land and infill development potential are dispersed throughout the district as shown in Figure 5.

These areas are generally in locations within, or on the fringes of, New Plymouth's existing residential limits. As such, they are relatively accessible to centres and other services. Waitara, Inglewood and Ōakura all currently have significant parcels of undeveloped residential land available. New Plymouth also contains large amounts of undeveloped residential land.

While zoned for development, at times undeveloped residential land can have challenges in delivering good quality urban development. This zoning can be perceived as a "green light". However, there are often other matters to consider, such as the cultural and ecological values of an area. Early engagement with NPDC and other interested partners is a key step in ensuring the consenting process runs smoothly.

Figure 5: Undeveloped Residential Land



Infrastructure

The infrastructure required to realise the development potential within areas proposed for intensification as well as undeveloped residential land varies significantly across the district.

In relation to Medium Density Residential Zone areas, water modelling undertaken by NPDC show certain discrete issues in relation to servicing these areas. However, these known issues generally have solutions available that are budgeted for through NPDC’s LTP.

In relation to undeveloped residential land, of particular note are current levels of service for stormwater and sewer within the Waitara and Inglewood networks. Upgrades to these networks are planned and have funding allocated through NPDC’s LTP.

Full details of the planned infrastructure projects supporting this growth be found within the Technical Document.

Growth Areas

In addition to the existing residential areas, a key component of providing for future growth in the district will be through Structure Plan Development Areas that are included in the PDP.

Structure Plan Development Areas

Five structure plan development areas have been identified as being suitable for urban growth purposes. These form the basis for greenfield growth in the district over the short to medium term. Structure plans have been developed for each area which shows future development and land use patterns, the layout and nature of infrastructure, open space and other key features and constraints that influence how the effects of development will be managed.

Each of these areas are located on the periphery of New Plymouth and Waitara's existing urban boundaries, offering natural extensions to these urban boundaries. Being near existing infrastructure, these areas offer a relatively cost-effective approach to providing for greenfield growth in the district.

Tangata whenua have been heavily involved in the structure planning exercises for these areas. Of note, was the involvement during the preparation of the PDP where tangata whenua worked on the content of the structure plans and their associated provisions to better reflect tangata whenua values in relation to these areas.

NPDC has an extensive understanding of the infrastructure required to enable the development of these areas. Key projects requiring NPDC delivery are included within the LTP and Infrastructure Strategy.

There are instances where more "fine grained" structure planning can assist in ensuring these areas are developed appropriately, while giving landowners and developers confidence on what is expected in these areas. NPDC has recently been undertaking this work on certain priority areas (e.g. Puketapu Structure Plan Development Area). Both Councils will continue to consider the need to undertake these exercises on the remaining development areas.

The five structure plan development areas are described in detail within the Technical Document, while the following series of maps (Figures 6-11) spatially identify the infrastructure necessary to support them.

Figure 6: Location of Structure Plan Development Areas and Future Urban Zones



Figure 7: Puketapu Structure Plan Development Area



Figure 8: Carrington Structure Plan Development Area



Figure 9: Junction Structure Plan Development Area



Figure 10: Johnston Structure Plan Development Area



Figure 11: Patterson Structure Plan Development Area



Business Growth

Business Land

The district has a set of existing centres that operate in the following hierarchy:

- City Centre Zone – the principal centre that provides a wide range of retail and business service activities, living activities, community facilities and visitor accommodation that serve the district and Taranaki region.
- Town Centre Zone – the town centres of Fitzroy, Waitara and Inglewood that provide a range of business, retail and entertainment activities that serve the needs of each town centre’s community and surrounding rural areas.
- Local Centre Zone – rural service centres, village centres, suburban shopping centres and neighbourhood shops providing convenience-based business and retail activities that serve the needs of each local centre’s community and surrounding areas.

The PDP also provides for businesses and retail activities located outside of the centres. These zones are:

- Mixed Use Zone – covers a large part of the one-way network wrapping around the City Centre Zone but is also located in parts of Inglewood, Waitara, small areas of New Plymouth and the Waiwhakaiho Valley. This zone is predominantly used for and characterised by commercial service, sport and recreation and community activities. The type and frequency of business and retail activities is limited in this zone to ensure the viability and vibrancy of the centres is not compromised. Commercial service activities may not be appropriate for the centres because of

the effects they generate or because of the unavailability of site large enough to accommodate store footprint requirements.

- Large Format Retail Zone – an area in the Waiwhakaiho Valley. This zone is predominantly use for and characterised by large format activities.
- The Commercial Zone – is currently only applied in one location, being the site of the former Moturoa Coolstores at 20 Hakirau Street, New Plymouth. This land is identified as having specific values and presenting specific and unique opportunities for a new Commercial Zone, enabling mixed use, commercial and residential development near to the coast, Port Zone and culturally significant sites at the western end of New Plymouth City.

Industrial Land

The PDP consolidated four Industrial Environment Areas from the Operative District Plan (ODP) into one General Industrial Zone. Industrial land in the district is located near key transport routes at Glen Avon, Bell Block and Paraitē, and around Port Taranaki. There is also General Industrial zoned land in Waitara, Inglewood and Egmont Village and some smaller industrial areas in suburban New Plymouth.

The General Industrial Zone provisions aim to prioritise the zone for industrial activities. The General Industrial Zone has a strategic role in supporting the Commercial and Mixed-Use zones. The non-complying activity status for retail and office activities (that are not ancillary to industrial activities) seeks to arrest the leakage of these activities out of the centre zones. The discretionary activity status for commercial service activities seeks to support the integrity of the Mixed-Use Zone. This role in supporting the vitality and vibrancy of the Commercial and Mixed-Use zones is captured in the objectives and policies of the General Industrial Zone.

A June 2021 report undertaken by Property Economics¹² indicates that the district has sufficient industrial zoned capacity to accommodate future industrial land demand over the long-term. Future growth of the industrial sector is well catered for, including an element of spare capacity.

Future Urban Zones

Future Urban Zones will provide long-term growth (10-30 years) within the district. These areas apply to land that has been identified as being suitable for urban development in the future and are identified in Figure 12 below. When the land is needed for urban purposes, it will be rezoned to enable that to occur (e.g. to a residential or industrial zone).

¹² Property Economics (2021), *New Plymouth Future Industrial Land Demand Economic Assessment*, (<https://proposeddistrictplan.npdc.govt.nz/media/hcsn00ag/hearing-10-appendix-3-property-economics-report.pdf>)

Figure 12: Future Urban Zones



Each of these areas are located to provide logical extensions to existing urban boundaries.

Well-considered structure planning of Future Urban Zones will be vital to ensure development occurs in such a way that ensures the outcomes of this FDS are achieved. These processes can have long lead in times. As such, it is important that the Councils recognise the time and resource these processes take and begin to prioritise areas for future development.

Smart Road FUZ

Smart Road Future Urban Zone is the largest urban growth area in the district and totals 372.1 hectares. This area will see the logical extension of the New Plymouth urban area and maintain a relatively compact urban form, and allow access to schools, community services and the city centre.

Members of the development sector have strongly advocated for enabling the development of portions of this area within the short-term. In particular, interest has been shown in developing approximately 20 ha of land at the northern extent of the current boundary of Future Urban Zoning.

Significant investment in the planning, design and delivery of infrastructure is required prior to development of this area. Full details of the infrastructure required can be found within the Technical Document supporting this strategy. Of particular note is the need to increase level of service in relation to water supply. At present it is not possible to provide adequate firefighting flow to this area. The solution for resolving this requires an “all of catchment” approach, requiring the construction of a new reservoir at the southern end of Smart Road and an associated trunk main. Both wastewater and stormwater also require solutions to enable development of the land, including consideration of impact on existing river management schemes. As such, it will be difficult to develop a portion of the area “out of sync”.

It is also important to note that no structure planning exercise has taken place for Smart Road. The typologies and densities of development enabled would be best determined through this process. Given the size of the area, it is likely that some provision for commercial services and social infrastructure would be appropriate. The Ministry of Education has also indicated that the development of Smart Road is likely the point at which additional education facilities would be required for the district.

Given the timing involved in the planning, design and delivery of both structure planning for the area and solutions to current three waters levels of service, it is considered appropriate for the area to remain as a long-term option for growth. However, given the importance of Smart Road to New Plymouth’s overall growth, it would be appropriate for the Councils, over the short-term, to give further consideration to how and when the area will develop.

Junction FUZ

The Junction Future Urban Zone is located next to the Junction Structure Plan Development Area. This area is located in Upper Vogeltown. The topography of the area is steep to undulating with the land dropping towards the south from Tarahua Road and a steep ridge extending north to south from the eastern end of Junction Street. The Te Henui Stream frames the area and provides high recreational value to the area. Totalling 9.9 hectares in area, this zone has the potential for 113 feasible lots although this is dependent on ground conditions which will be determined through subdivision.

Additional wastewater services to enable future development of the area are included in the LTP.

Ōakura South/West FUZ

The Ōakura growth areas were identified as part of the Ōakura Structure Plan process, under the guidance of the Coastal Strategy. Located on either side of State Highway 45 these areas provide potential land supply for the district.

Ōakura South is 13 hectares in size with the potential for 117 feasible lots. Areas along the Ōakura River have been removed from the area as they are not developable for residential use.

This area has been subject of a recent unsuccessful private plan change application. The landowner also pursued residential rezoning through the PDP hearings. These processes did not question the suitability of the land for development in the long-term (as it is currently earmarked), but rather that at present, there were sufficient reasons to not rezone to urban at this time.

The landowner has also indicated that this area should be included within this FDS as suitable for residential use in the short term. As per the decisions in each of these previous processes, it is considered appropriate to maintain this area for long-term development potential.

The Ōakura West area is 39.5 hectares with the potential for 355 feasible lots.

Both growth areas require comprehensive structure planning which will likely need to be informed by a social impact assessment. In order for Ōakura to grow, we need to understand how the social impacts of growth will be managed. Infrastructure considerations also need to be worked through. There are particular issues regarding access and the intersection of Wairau Road, with an intersection and consideration to the three waters is also required. Provision of open and recreation space, medical and educational facilities will also form part of this future analysis.

Frankley/Cowling FUZ

This Future Growth Zone is located on the south western pocket of the New Plymouth urban boundary. It is a large area of 138.5 hectares, with the potential for 814 feasible lots. The growth area is accessible to services and schools and has good roading connections to the central city. Located on the western side of the city the identification of this area balances future growth pressures and maximises the use of existing community facilities and resources. It provides for the outward extent of urban growth, clearly defining the future urban boundary of New Plymouth city.

There are infrastructure constraints associated with the development of this land, particularly in regard to wastewater and potable water supply. Upgrades have been included in the Infrastructure Strategy.

Ranfurly Street, Waitara

This is a new area included in the PDP and is 11.6 hectares. This land is part of the original survey plans for Waitara and contains a grid layout of paper roads. It represents a logical boundary for urban containment of the western edge of Waitara. Using this area will allow existing pathways and road networks to be utilised and will help to ensure that the town is not compromised by sporadic and/or disconnected development. Whereas there are many natural hazards impacting Waitara, the Ranfurly FUZ contains no known hazards.

Waitara East

This Future Urban Zone is 19.2 hectares in size with the potential for 231 feasible lots. Through the PDP process, this area was reduced substantially in size due to the cultural values associated with the whenua and awa of the area and to better meet the urban growth needs of Waitara. Two other areas have been identified as more appropriate for growth in Waitara (further rezoning along Armstrong Avenue and a new Future Urban Zone over Ranfurly Park). These two new areas are considered to be more logical for residential development given their location to existing amenities and infrastructure, however this area also holds cultural importance to Manukoriki hapū. These cultural values will need to be taken into account in future subdivision processes. Note: The ODP Waitara West Future Urban Development Overlay has not been carried over into the PDP.

Area R

Area R is the eastern extent of development in the Bell Block area. There are access issues with the State Highway intersection that are being addressed through the Airport Drive Realignment project. NPDC has accelerated planning in this area and is progressing a designation to support the changes to the local roading network that will accommodate and support a local roading upgrade. The land is earmarked for future employment land, although there is potential for residential land to the west of the proposed Airport Drive realignment. Further economic work will help determine how the land should be utilised to complement established business land in and around Bell Block.

Oropuriri

This area of 25.8 hectares is located between the State Highway and Oropuriri Road and has been investigated for future industry zoning (continuing the land-uses at either side) through previous district planning processes. Significant cultural values have been identified in this area by Puketapu and Ngāti Tawhirikura hapū. Any further roading connection is likely to impact cultural values impacting the ability for the area to be comprehensively developed. Further investigations are required regarding stormwater management and roading.

5.1 What capacity will this provide?

Residential Land

The ~~draft~~ FDS provides potential capacity for about ~~11,355~~ 12,043 new houses in and around the New Plymouth district. This is slightly more than the projected demand of 11,027 New Plymouth district is required to accommodate over the next 30 years (by the end of 2054).

We estimate that the ~~draft~~ FDS will provide capacity for new houses across the New Plymouth district as follows:



Over the last five years, around 50 per cent of all new dwellings were in residential areas of New Plymouth, with an additional 20 per cent in the Bell Block residential area. The remaining 30 per cent are either in the residential areas of our smaller townships or the rural area. Bell Block is expected to continue to have a high number of consents in the short term to medium term, with the development of the Puketapu Structure Plan Development Area and a large proportion of undeveloped residential land.

Historically NPDC has seen a high proportion of consents in Rural Production Zone. However, policy changes to the PDP aim to decrease the number of applications in the rural environment (short to medium term) along with the zoning to Rural Lifestyle Zone.

The anticipated residential capacity distribution throughout the New Plymouth district is shown in Figure 13.

Figure 13: Anticipated Residential Capacity Distribution Throughout New Plymouth District



Business Land

Most of the district’s long-term capacity designated for retail and commercial use is in the city centre and the adjacent Mixed-Use Zone. The overall potential plan-enabled, feasible, and suitable for development capacity amounts to 44.3 hectares.

In the short to medium term, the current potential capacity for industrial land in the district is met by the existing industrial land, totaling 163 hectares. To ensure sufficient capacity for long-term demands, NPDC has identified the Oropuriri FUZ, encompassing 44 hectares, as the designated area for future industrial development.

6. Implementation

The ~~draft~~ FDS is intended to provide direction, give confidence to, and help our partners to play their part in the growth and development of our urban areas. The ~~draft~~ FDS will not be delivered by the Councils alone and the delivery of many of the actions will require wider engagement through other processes. The Councils will need to partner with iwi and hapū, the Government, non-government organisations, businesses and community groups to achieve positive growth.

How can we best manage and foster relationships between the Council, the development community and other stakeholders for increased understanding of expectations and intentions?

The ~~draft~~ FDS is a long-term strategic document with a 30-year view of growth and development, and it cannot be delivered all at once. To achieve the FDS outcomes and implement the growth strategy, we need to take actions over a long period of time. The timing and staging of development are key components of implementation.

A ~~draft~~ FDS implementation plan will sit alongside the FDS as a single document, as required by the NPS-UD. An implementation plan provides guidance on how and where growth and associated infrastructure will occur. It also provides a framework for prioritising actions over the short, medium and long term.

The Structure Plan Development Areas identified in the ~~draft~~ FDS form a key component of the ~~draft~~ FDS Implementation plan. Where Council activities to support growth are included in the LTP, these have been included in the implementation plan. We will align future LTP and FDS processes, to deliver the planning and delivery of key infrastructure to support growth.

In addition to the ~~draft~~ FDS implementation plan, NPDC already promotes the use of the Residential, Subdivision and City and Town Centre Design Guides in its day-to-day implementation of the PDP. In the future, opportunities to encourage and incentivise intensification may be explored. This will support a key outcome of the FDS, that being to achieve a compact city where people can easily access jobs, services, education and quality open spaces. It also follows the District Plan Review where a considerable area of land was upzoned to provide for intensification. The district now has over 400 hectares of medium density zoned land, and infrastructure upgrades will be required to support infill.

Implementation with a focus on collaboration:

As part of the ongoing implementation of the FDS, NPDC will continue to meet regularly with the Technical Professionals Group and Developers Forum. This will be complemented by the Ngāmotu Growth Advisory Panel which is envisaged to provide an elevated collaborative platform for the District's growth planning.

Collaboration with tangata whenua and a Māori growth planning project is also included in the FDS implementation plan. This will investigate opportunities for accelerated structure planning, future urban planning and papakāinga in partnership with iwi and / or hapū.

The Councils' role in future infrastructure planning will be transparent through the Implementation Plan, and there will be flexibility to consider out-of-sequence growth where developers wish to lead master planning and plan changes.

The ~~draft~~ FDS implementation plan does not require public consultation under the NPS-UD. It is a stand-alone document that sits alongside this FDS and it is a live document that will be reviewed and updated annually. However, we consider that the information within it is helpful to the community and therefore we have included it in this draft FDS for information purposes as Figure 14 below.

6.1 Monitoring and Review

Add a section setting out how the Councils will assess and monitor capacity.

The FDS is a long-term strategic document that cannot be delivered all at once and in itself will not result in immediate change. To achieve the FDS outcomes and to deliver housing, we need to take actions over a long period of time. Ongoing monitoring of development will assist evaluating how our urban areas are growing and whether there is a need to bring forward, push back, or re-align the zoning and infrastructure servicing of land in response to demand.

Monitoring, review and responding to change as necessary is essential. The Councils are committed to working alongside iwi, hapu and the development sector to continue to improve and refine modelling. This is an area of continuous improvement and also a continual cycle of monitoring, modelling and pivoting where needed.

* Subject to 2024 Long Term Plan decisions

Figure 14: Draft FDS Implementation Plan* (Remove Implementation Plan from FDS to sit as its own stand along document)

DRAFT FDS IMPLEMENTATION PLAN				SHORT TERM 0-3 years			MEDIUM TERM 3-10 years						LONG TERM 10-30 years	
				24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	2034-2054
KEY														
✓ = Included as a line item in the draft 2024 LTP ➡ = Funded via the Kāinga Ora Homes and Communities Infrastructure Acceleration Fund ⚠ = No funding included in the draft 2024 LTP or Developer-led ● = Structure Plan Development Areas implementation timings ● = Future Urban Zone implementation timings ● = Urban intensification implementation timings														
STRUCTURE PLAN DEVELOPMENT AREAS				SHORT TERM 0-3 years			MEDIUM TERM 3-10 years						LONG TERM 10-30 years	
Puketapu Structure Plan Development Area				24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	2034-2054
- Three waters: Parklands Ave Extension Sewer				✓			●							
- Three waters: Water supply upgrades				✓	●									
- Three waters: Stormwater modelling completed to inform development				✓	●									
- Complete finer grained structure planning				✓	●									
- Three waters: Construction of stormwater assets – Phase 1				✓	●									
- Three waters: Construction of stormwater assets – Phase 2				✓						●				
- Transport: Parklands Ave Extension Waitaha Stream Bridge to Airport Dr				✓			●							
- Transport: Airport Drive/Parklands Avenue Roundabout				✓	●		●							
- Three Waters Bell Block Trunk Sewer – Capacity Upgrade				✓			●							
- Transport: Shared pathway along the Waitaha Stream				✓			●							
- Transport: Construction of bridge over the Waitaha Stream				✓	●		●							
- Transport: Construction of two underpasses - Waitaha Stream				✓			●							
- Land purchase – Area Q/Puketapu Growth Area				✓	●									
- Investigation of Johnson Land for inclusion in Puketapu Structure Plan				⚠	●									
Johnston Structure Plan Development Area				24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	2034-2054
- Three waters: New sewer main and road upgrading				⚠										
- Potential Reserve purchases				⚠										
Carrington Structure Plan Development Area				24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	2034-2054
- Three waters: Stormwater modelling completed to inform development				✓	●									
- Complete finer grained structure planning				✓	●									
- Land purchase – Upper Carrington Growth Area				✓	●									
- Three waters: Upgrading of the Huatoki Valley Sewer Main				✓	●									
- Transport: Upper Carrington Road widening				✓						●				
- Three waters: Construction of stormwater ponds				⚠										
- Three waters: Water supply improvements				✓	●									
Junction Structure Plan Development Area				24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	2034-2054
- Three waters: Stormwater modelling completed to inform development				✓	●									
- Complete finer grained structure planning and investigations into flooding and liquefaction issues				✓	●									
- Three waters: Upgrade to sewer, construction of new sewer pump station and further downstream sewer upgrades				✓					●					
- Three waters: Construction of stormwater ponds				⚠										
- Transport: Upgrade to Junction Street Bridge and seal widening				✓	●									
- Land purchase – Junction Growth Area				✓					●					
Patterson Structure Plan Development Area				24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	2034-2054
- Transport: Frankley Road shared pathway				➡	●									
- Transport: Frankley Road Tukapa Street Intersection Upgrades				➡	●									
- Transport: Patterson Road Seal Widening				➡	●									
- Transport: Patterson Road Extension				➡	●									
- Transport: Cycleway and Walkway over Sutherland Sewer				➡	●									
- Three Waters: Sutherland Sewer				➡	●									
- Three Waters: Veale Road Pump Station inlet/outlet upgrade				✓				●						
- Three Waters: Patterson Road Water Main				➡	●									
- Land purchase – Patterson Growth Area (esplanade reserve)				✓	●			●						

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- Three Waters: Stormwater modelling completed to inform development	☑	●													
- Three Waters: Stormwater detention ponds	⚠														
- Transport: Potential walkway over water main	⚠														
- Complete finer grained structure planning	☑	●													
Armstrong Ave (Specific Control Area)		24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34		2034-2054		
- Three Waters: Tangaroa stormwater management	☑	●													
- Three Waters: Waiari stormwater management	☑														
- Complete finer grained structure planning and cultural values assessment	⚠														
- Transport: Upgrade of Armstrong Ave, Upgrade of Waitara High School driveway and pedestrian/driveway upgrade for School buses.	⚠														
FUTURE URBAN ZONES		SHORT TERM 0-3 years			MEDIUM TERM 3-10 years						LONG TERM 10-30 years				
Junction (Stage 2) Future Urban Zone		24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34		2034-2054		
- Three Waters: Stormwater modelling completed to inform development	☑			●											
- Feasibility of FUZ / wider Junction areas	☑														
- Structure planning	☑														
- Three Waters: Investigation work for all stormwater	⚠														
- Three Waters: Investigation work for water supply	⚠														
- Three Waters: Investigation work for sewer, including a potential new sewer pump station	⚠														
- Transport: Investigation work for roading	⚠														
Frankley/Cowling Future Urban Zone		24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34		2034-2054		
- Three Waters: Stormwater modelling completed to inform development	☑														
- Feasibility of FUZ	☑														
- <u>Potential Plan Change</u>															
- Structure planning	☑														
- Transport: Cowling Road widening	⚠														
- Three Waters: Investigation work for all stormwater	⚠														
- Three Waters: Investigation work for water supply	⚠														
- Three Waters: Investigation work for sewer, including a potential new sewer pump station	⚠														
- Three Waters: Waimea sewer extension	☑														
Area R Future Urban Zone		24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34		2034-2054		
- Three Waters: Stormwater modelling completed to inform development	☑			●											
- Feasibility of FUZ	☑														
- Structure planning	☑														
- Three Waters: Investigation work for all stormwater	⚠														
- Three Waters: Investigation work for water supply	⚠														
- Three Waters: Investigation work for sewer, including a potential new sewer pump station	⚠														
- Transport: Investigation work for roading	⚠														
- Transport: Airport Drive/round-about realignment roading work	☑														
Ōakura Future Urban Zones (South and West)		24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34		2034-2054		
- Feasibility of FUZ West	☑														
- Feasibility of FUZ South (including investigation into a retirement village proposal)	☑														
- <u>Potential Plan Change for Ōakura South</u>															
- Structure planning	⚠														
- Transport: Wairau/South Road round-about	⚠														
- Transport: SH45 Wairau Road underpass	⚠														
- Three Waters New water supply main	☑														
- Three Waters Investigation work for stormwater	⚠														
- Three Waters Investigation work for water supply	⚠														
- Three Waters Investigation work for sewer, including a potential new sewer pump station	⚠														
- Transport: Investigation work for roading	⚠														
Smart Road Future Urban Zone		24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34		2034-2054		

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- Smart Road FUZ feasibility	☑		●																	
- <u>Potential Stage 1 Plan Change</u>			●																	
- Investigate the impacts of development on Mangaone Stream	⚠																			●
- Structure planning	⚠																			●
- Three Waters Investigation work for all stormwater	⚠																			●
- Three Waters Investigation work for water supply	☑																			●
- Three Waters Investigation work for sewer, including a potential new sewer pump station	☑																			●
- Land acquisition for Smart Road reservoir	☑		●																	
- Three waters: Smart Road reservoir	☑																			●
- Transport: Investigation work for roading, including ring road	☑																			●
- Transport: Waiwhakaiho second bridge crossing investigation	☑																			●
Oropuriri Future Urban Zone		24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34		2034-2054							
- <u>Oropuriri Road FUZ feasibility (in conjunction with NZTA, landowners and developers to review the most appropriate zoning for the Oropuriri FUZ).</u>																				●
URBAN INTENSIFICATION		SHORT TERM 0-3 years			MEDIUM TERM 3-10 years						LONG TERM 10-30 years									
- Three waters: Inglewood sewer projects	☑	●																		
- Three waters: Waitara sewer projects	☑	●																		
- Three waters: Wastewater treatment plant storage (district-wide growth)	☑	●																		
- Three waters: Inglewood stormwater	☑	●																		
- Identify priority areas for intensification (areas already zoned MRZ)	⚠	●																		
- Waimea sewer extension	☑	●																		
- <u>Three waters: Urenui and Onaero sewer system (investigate further areas for possible intensification in Urenui, including Māori land, which are supported by the wastewater treatment plant)</u>	☑	●																		
- Investigate further areas for possible intensification (future rezoning to MRZ) Long term response to monitoring and review of uptake of infill and land supply)	⚠												●							
TANGATA WHENUA		SHORT TERM 0-3 years			MEDIUM TERM 3-10 years						LONG TERM 10-30 years									
- <u>Māori growth planning project</u>																				
- <u>Work with tangata whenua to explore opportunities to develop guidance notes and other documents that provide support and clarity on process and scope issues.</u>																				
- <u>Ongoing communication with Ngā Kaitiaki Roopū (including investigate accelerated structure planning, future urban planning and papakāinga in partnership with iwi and / or hapū)</u>																				
SPATIAL PLANNING		SHORT TERM 0-3 years			MEDIUM TERM 3-10 years						LONG TERM 10-30 years									
Waitara Spatial Plan		24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34		2034-2054							
- <u>Development of the Spatial Plan</u>		●																		
- <u>Constraints and hazard assessments</u>																				
- <u>Rezoning assessments</u>																				
- <u>Investigate the provision and type of industrially and commercially zoned land as part of spatial plan</u>																				
Bell Block Spatial Plan		24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34		2034-2054							
- <u>Development of the Spatial Plan</u>		●																		
- <u>Investigate the provision and type of industrially and commercially zoned land as part of spatial plan</u>	⚠																			
- <u>Assessment of rezoning of 108 Henwood Road, New Plymouth as part of the Bell Block spatial plan.</u>																				
Inglewood Spatial Plan		24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34		2034-2054							
- <u>Development of the Spatial Plan (including investigate the provision and type of industrially and commercially zoned land as part of spatial plan)</u>	⚠			●																
INVESTIGATE AREAS IDENTIFIED FOR POSSIBLE GREENFIELD GROWTH		SHORT TERM 0-3 years			MEDIUM TERM 3-10 years						LONG TERM 10-30 years									
Long term potential* (*depending on other strategic planning processes, monitoring and review of land supply)		24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34		2034-2054							
- Carrington North	⚠																			
- Carrington South (<u>to investigate the rezoning of land to either RLZ or GRZ</u>)	⚠				●															
COUNCIL PROCESSES		SHORT TERM 0-3 years			MEDIUM TERM 3-10 years						LONG TERM 10-30 years									
- <u>Development of a PDP Implementation Plan to proactively assist change management and to achieve the outcomes sought by the PDP.</u>																				
- <u>District Plan - Plan Change (omnibus plan change: to finetune the PDP and reduce duplication, inefficiencies and/or pinch points that are</u>																				

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<u>creating challenges for the provision of housing and development (in collaboration with the Growth Advisory Panel)</u>				
- <u>District Plan - Plan Change (plan change specific to SASM/AS)</u>		○		
- <u>Establish Ngāmotu Growth Advisory Panel</u>		○		
- <u>Ongoing regular meetings with Technical Professionals Group and Developers Forum</u>				

Appendix I: Officers Recommendations on submissions

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
01	Jacob Sorenson (Out of Scope)	N/A	Reject	Out of Scope
02	Nick Field	<ul style="list-style-type: none"> General approach to growth: Other options 	Accept in part	Submitter support for Option 1 – the Urban Intensification Focus is noted in officer’s report. Overall, officers’ recommendation is to retain Option 3 (Balanced Focus).
		<ul style="list-style-type: none"> Rezoning Requests 		Submission considered long term focus on Oakura is unjustified due to its lack of facilities, centres and infrastructure. No changes recommended in response to submission.
03	Victoria Dungan	<ul style="list-style-type: none"> General approach to growth: Other options 	Accept in part	Submitter support for Option 1 – the Urban Intensification Focus is noted in officer’s report. Overall, officers’ recommendation is to retain Option 3 (Balanced Focus).
04	Paul McGrath (BLANK)	N/A	Reject	N/A
05	Rosalie Kalin / R & R Kalin Partnership/Kalindale Builders Ltd	<ul style="list-style-type: none"> Collaboration opportunities for growth planning 	Accept in part	Accept there is a greater need for information sharing and involvement in Council processes. Addressed in part by officers recommendation to form a Planning Advisory Group; and Officer’s Report Back additional recommendation to include a section in the FDS titled ‘Collaboration and Transparency’ which outlines the mechanisms to support collaboration and growth.
		<ul style="list-style-type: none"> Outcome statements 	Accept in part	Addressed in Councils officers’ recommendation by recommended amendments to “Capacity” and “Infrastructure” outcome statements
		<ul style="list-style-type: none"> General approach to growth: Option 3 - Balanced Focus 	Accept in part	Submitter support for Option 3 (Balanced Focus), noting deeper appropriate investigation/ consideration for intensification and prioritise

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
				existing greenfield areas. Addressed by implementation plan.
		<ul style="list-style-type: none"> Business Capacity 	Accept in part	Council officer's report responds to submitter comments on commercial land (focusing on CBD/Centre City and the foreshore) but does not recommend changes to FDS.
		<ul style="list-style-type: none"> Rezoning Requests 	Accept in part	Officers report acknowledges that there is a need to address urban growth more comprehensively in Inglewood and Waitara. Addressed by officers recommendation to include spatial planning for Inglewood and Waitara in the implementation plan.
06	Bev Gibson / Ngāti Tawhirikura Hapū	<ul style="list-style-type: none"> Tangata whenua aspirations and outcomes 	Accept in Part	The FDS Implementation Plan includes upgrades to Three Waters infrastructure, aligned with the LTP. Officers are happy to provide any information on their plans and programmes for different catchment areas. Addressed in Councils officer's recommendation to investigate accelerated structure planning, future urban planning and papakāinga in partnership with iwi and / or hapū through the Ngā Kaitiaki Roopū,
		<ul style="list-style-type: none"> General approach to growth: Not stated 	-	-
07	Ministry of Education	<ul style="list-style-type: none"> Tangata whenua aspirations and outcomes 	Accept in part	Addressed in Councils officers recommendation by including wording sought to section 4.2 of the FDS. Officers agreed in principle with MoE but recommend that any changes are guided and supported by iwi and hapū.
		<ul style="list-style-type: none"> General approach to growth: Not stated 	-	-
08	Pat Sole Surveyors Ltd	<ul style="list-style-type: none"> General approach to growth: Not stated 	-	-

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
		<ul style="list-style-type: none"> Residential Development Capacity 	Accept in part	Concerns that strategy will not deliver housing required noted and recommendations address this.
09	CGR Developments Ltd	<ul style="list-style-type: none"> Roles and relationships 	Accept in part	Recognition of relationships with development community and tangata whenua as treaty partners, will be crucial in growth planning and implementing New Plymouth's (PDP).
		<ul style="list-style-type: none"> Outcome statements 	Accept in part	Submission sought an outcome statement around 'who' is expected to deliver growth. Addressed in part by officers recommendation to inclusion of a new outcome statement relating to collaboration; and Officer's Report Back additional recommendation to include a section in the FDS titled 'Collaboration and Transparency' which outlines the mechanisms to support collaboration and growth.
		<ul style="list-style-type: none"> General approach to growth: Option 3 - Balanced Focus 	Accept	Submitter support for Option 3 (Balanced Focus),
		<ul style="list-style-type: none"> Residential Development Capacity 	-	-
		<ul style="list-style-type: none"> Business Capacity 	Accept in part	Addressed through officers recommendation to investigate the provision and type of Large Format Retail zoned land in the District and consider updating the FDS implementation plan and PDP via a plan change to accommodate any shortfall and change in provisions.
		<ul style="list-style-type: none"> Rezoning Requests 		<p><u>Smart Road FUZ</u> Priority order of FUZ is addressed by officers' recommendation to bring forward the scoping of the feasibility/planning for the Smart Road FUZ to the 2024/2025 financial year.</p> <p><u>Oropuriri FUZ</u> Addressed through officers recommendation for</p>

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
				a feasibility study to be undertaken in 2026/2027 (in conjunction with NZTA, landowners and developers) to review the most appropriate zoning for the Oropuriri FUZ.
10	Royal Forest and Bird Protection Society of New Zealand Inc.	• Outcome statements	Accept in part	Addressed in Councils officers' recommendation by inclusion of new "Health, Safety and Equity" outcome statement
		• Natural Environment	reject	Officers consider that the level of detail in relation to the natural environment contained within the Draft FDS is commensurate with the focus of the higher order direction (NPS-UD) under which the FDS is developed. No change was recommended.
		• Constraints	Accept in part	Officers are satisfied that our regulatory regional plans and the PDP will ensure the Councils meet their protective obligations under the RMA, New Zealand Coastal Policy Statement and the NPS-FM
		• General approach to growth: Option 3 - Balanced Focus	Accept	Submitter support for Option 3 (Balanced Focus), noting a preference for brownfield development
11	Summerset Group Holding Limited	• General approach to growth: Option 3 - Balanced Focus	Accept in part	No changes recommended in response to submission. In the officers' view, retirement housing is still considered residential. Addressed in part by Officer's Report Back report in Section 2.9 and App 3 - economic advice on the retirement market.
12	NZ Transport Agency / Waka Kotahi	• FDS Implementation Plan		Officers report notes that the suggestions in submissions to improve the Implementation Plan will be considered at the next annual review when the document is developed more fully. Addressed by Council officers' recommendations to develop a more detailed standalone FDS

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
				Implementation Plan, aligned with decisions on the LTP; and Review, update and amend the FDS Implementation Plan annually
		<ul style="list-style-type: none"> Infrastructure 	Accept in part	Addressed in part by Council officers recommendation to add key transport interventions from the implementation plan into the body of the FDS. Officers agree with submission that Integrated Transport Framework needs to be incorporated into the FDS as a framework for making investment decisions on transport infrastructure in the long term. Addressed by new text added to section 3.3.
		<ul style="list-style-type: none"> Reverse Sensitivity 	reject	seeking consent conditions on all future lots within 100m of the transport network is a deviation from the approach worked through the PDP hearings.
		<ul style="list-style-type: none"> General approach to growth: Option 3 - Balanced Focus 	Accept in part	Addressed in part by Council's recommendation to include spatial planning work in the implementation plan.
		<ul style="list-style-type: none"> Business Capacity 	Accept in part	Addressed by Council officer's recommendation to Investigate the provision and type of industrially and commercially zoned land in Waitara, Bell Block and Inglewood in relation to new housing areas and the land transport system as part of the spatial plan processes; and consider updating the FDS Implementation Plan and PDP via a plan change to accommodate any shortfall and change in provisions.
		<ul style="list-style-type: none"> Rezoning Requests 	-	-

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
13	Survey and Spatial NZ Taranaki Branch	<ul style="list-style-type: none"> General approach to growth: Not stated 	Accept in part	Officer’s Report Back addresses the evidence of Mr Broadmore in Section 2.10 (of Officers’ Report Back report).
14	Chris Herd and Companies	<ul style="list-style-type: none"> Collaboration opportunities for growth planning 	Accept in part	Accept there is a greater need for information sharing and involvement in Council processes, and; Addressed in part by Officers recommendation for a Planning Advisory Group; and Officer’s Report Back additional recommendation to include a section in the FDS titled ‘Collaboration and Transparency’ which outlines the mechanisms to support collaboration and growth.
		<ul style="list-style-type: none"> Outcome statements 	Accept in part	Addressed in Councils officers' recommendation by recommended amendments to “Capacity”, “Infrastructure” outcomes and new “Collaboration” outcome statement. Officers rejected amendments to the “Highly Productive Land outcome statement.
		<ul style="list-style-type: none"> Constraints 	Accept in part	Addressed in Councils officers' recommendation to consider greater scrutiny and investigation of constraints as relevant considerations within structure planning; and Addressed in Councils officer’s recommendation to explore financial options such as cost sharing and alignment with LTP to invest in better understanding of ground conditions and other constraints at the time of structure planning and rezoning.
		<ul style="list-style-type: none"> General approach to growth: Option 3 - Balanced Focus 	-	-

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
		<ul style="list-style-type: none"> Business Capacity 	Accept in part	Addressed in Council officers' recommendation to investigate the provision and type of industrially zoned land in Waitara, Bell Block and Inglewood as part of the spatial plan processes for these communities and consider updating the FDS Implementation Plan and PDP via a plan change to accommodate any shortfall and change in provisions.
		<ul style="list-style-type: none"> Rezoning Requests 	Accept in part	Addressed through Council officers' recommendation for a feasibility study to be undertaken in 2026/2027 (in conjunction with NZTA, landowners and developers) to review the most appropriate zoning for the Oropuriri FUZ.
15	Aggregate and Quarry Association	<ul style="list-style-type: none"> Reverse Sensitivity 	Accept in part	Submitter point is noted and officers consider it best managed through zoning in the PDP which manages the compatibility of activities in zones and manages zone interfaces. No changes to FDS recommended.
		<ul style="list-style-type: none"> General approach to growth: Not stated 	-	-
16	Kiwi Trust (Tracey Dempster and Darren Erb)	<ul style="list-style-type: none"> General approach to growth: Not stated Rezoning Requests 	Accept in part	Officers report notes that 22 Airport Drive, Bell Block is currently subject to an Environment Court Appeal Dempster & Erb V NPDC (ENV-2023-AKL-000122). The notice of appeal relates to the zoning of the property being FUZ and requests that their land be rezoned Mixed Use (Commercial) or Town Centre Zone. The matter is currently part of an active Environment Court mediation process, and the FDS will be updated in due course if necessary.
		<ul style="list-style-type: none"> Rezoning Requests 	Accept in part	
17	Rachael Cottam – Meadow View Developments	<ul style="list-style-type: none"> Collaboration opportunities for growth planning 	Accept in part	Accept there is a greater need for information sharing and involvement in Council processes.

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
				Addressed in part by officers recommendation to form a Planning Advisory Group; and Officer's Report Back additional recommendation to include a section in the FDS titled 'Collaboration and Transparency' which outlines the mechanisms to support collaboration and growth.
		<ul style="list-style-type: none"> • Outcome statements 	Accept in part	Submission emphasizes increased focus on Infrastructure, Choice and Capacity outcomes. FDS has retained those outcomes, but has re-arranged them into alphabetic order, not priority order.
		<ul style="list-style-type: none"> • General approach to growth: Option 3 - Balanced Focus 	Accept in part	Submitter support for Option 3 (Balanced Focus), noting deeper appropriate investigation/ consideration for intensification and prioritise existing greenfield areas. Addressed in part by work included in the FDS implementation plan.
		<ul style="list-style-type: none"> • Rezoning Requests 	Accept in part	Requested rezoning is addressed by Council officers' recommendation to amend the implementation plan to consider any rezoning of 108 Henwood Road as part of the Bell Block spatial plan, commencing July 2024; and Indicative road is addressed in paragraphs 8 and 9 of Officer's Report Back
18	Health NZ / Te Whatu Ora	<ul style="list-style-type: none"> • Outcome statements 	Accept in part	Addressed in Council officers' recommendation by inclusion of new "Health, Safety and Equity" outcome statement
		<ul style="list-style-type: none"> • Natural Environment 	Accept	Councils officers' report notes submitter support. No further changes recommended.
		<ul style="list-style-type: none"> • General approach to growth: Option 3 - Balanced Focus 	Accept in part	Submission seeks council address Option 3 disadvantages, and takes an active role in ensuring that areas identified for

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
				future intensification and development also include plans that provide for the necessary infrastructure. Addressed in part by work included in FDS implementation plan.
		<ul style="list-style-type: none"> Housing Choice 	Accept in part	Responding to Homelessness is addressed in part by inserting a new 'equity' outcome into the FDS that the issues relating to access to housing which is affordable can be considered when prioritising for future housing development.
19	Landpro Limited	<ul style="list-style-type: none"> Collaboration opportunities for growth planning 	Accept in part	Accept there is a greater need for information sharing and involvement in Council processes. Addressed in part by officers recommendation to form a Planning Advisory Group; and Officer's Report Back additional recommendation to include a section in the FDS titled 'Collaboration and Transparency' which outlines the mechanisms to support collaboration and growth.
		<ul style="list-style-type: none"> PDP impacting development and growth 	Accept in part	<u>Officers Hearing Report:</u> Officers' report acknowledges that the PDP takes a significantly different approach to land use and subdivision from the ODP, and that the degree of change may cause challenges initially. Council considers that many of the matters raised are implementation issues and it will require adjustments, flexibility and the Council and developers working together to embed the new PDP. Addressed in several officers' recommendations by resolving appeals quickly, establishing a Planning Advisory Group, continual monitoring, undertake a rolling schedule of plan changes and consideration of incentives; and

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
				<u>Officer's Report Back:</u> Addressed in officer's Officers' Report Back (Section 3.3), including an additional recommendation to update implementation plan to schedule an omnibus plan change relating to urban development with a view to notify mid-2025.
		<ul style="list-style-type: none"> A regional approach to growth planning 	Accept in part	Addressed in Council officer's recommendation to continue working collaboratively across all councils within Taranaki.
		<ul style="list-style-type: none"> Constraints 	Accept in part	Addressed in Councils officers' recommendation to consider greater scrutiny and investigation of constraints as relevant considerations within structure planning; and Addressed in Councils officer's recommendation to explore financial options such as cost sharing and alignment with LTP to invest in better understanding of ground conditions and other constraints at the time of structure planning and rezoning.
		<ul style="list-style-type: none"> General approach to growth: Not stated 	-	-
		<ul style="list-style-type: none"> Residential Development Capacity 	Accept in part	Council report agrees with submitters that the starting point for ensuring we have sufficient land available for development is a robust HBCA; and agree that where a piece of land is immediately affected by a SASM/AS/HH or other similar overlay, the areas contained within the extent of these areas should not be counted as being "plan-enabled"; and Addressed in part by officers' recommendation to add a new section setting out how the
		<ul style="list-style-type: none"> Plan-enabled Capacity 	Accept in part	

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
				Councils will assess and monitor capacity, including outline the principles for interpreting plan-enabled, feasible and reasonably expected to be realised development capacity.
		<ul style="list-style-type: none"> Business Capacity 	Accept in part	Submitter suggests that further analysis of the business zoning and its capacity/yield, e.g. Inglewood. Addressed in part by Council officers' recommendation to include spatial planning for Inglewood and Waitara in the FDS implementation plan.
		<ul style="list-style-type: none"> Rezoning Requests 	Accept in part	Officers report acknowledges that there is a need to address urban growth more comprehensively in Inglewood and Waitara. Addressed by officers recommendation to include spatial planning for Inglewood and Waitara in the FDS implementation plan.
20	Johnson Family	<ul style="list-style-type: none"> Outcome statements 	Accept in part	Addressed in Councils officers' recommendation by recommended amendments to "Capacity" and "Infrastructure" outcome statements
		<ul style="list-style-type: none"> General approach to growth: Option 3 - Balanced Focus 	Accept in part	Submitter support for Option 3 (Balanced Focus), noting that greater recognition should be given to maximising the potential of the existing growth areas.
		<ul style="list-style-type: none"> Rezoning Requests 	Accept in part	Officers support further investigations to be undertaken from July 2024 to add the portion of the Johnson's land on Airport Drive (highlighted in yellow) to the Puketapu Structure Plan Development Area. Addressed through amendments to the implementation plan.
21	Kāinga Ora – Homes and Communities	<ul style="list-style-type: none"> Collaboration opportunities for growth planning 	Accept in part	Addressed in Officers' Report Back additional recommendation to include a section in the FDS titled 'Collaboration and Transparency' which

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
				outlines the mechanisms to support collaboration and growth, additional collaboration outcome statement and Planning Advisory Group.
		<ul style="list-style-type: none"> FDS Implementation Plan 	Accept in part	Officers report notes that the suggestions in submissions to improve the Implementation Plan and additional spatial mapping will be considered at the next annual review when the document is developed more fully. Addressed by Council officers recommendations to develop a more detailed standalone FDS Implementation Plan, aligned with decisions on the LTP; and Review, update and amend the FDS Implementation Plan annually
		<ul style="list-style-type: none"> Tangata whenua aspirations and outcomes 	Accept in part	Officers agree in principle with Kāinga Ora but recommend that any changes are guided and supported by iwi and hapū.
		<ul style="list-style-type: none"> Constraints 	Accept in part	Addressed in part by Council officer's recommendation to consider at the hearing whether the inclusion of maps shown in Appendix 2 of the FDS technical document should be included in the FDS itself. If so, add the maps in Appendix 2 to section 4.4 of the FDS with commentary around how the constraints shape growth and infrastructure.
		<ul style="list-style-type: none"> General approach to growth: Option 3 - Balanced Focus 	Accept in part	Council officers report supports the suggestion to consider higher densities within development areas, particularly around new local centres, and that this be investigated during finer-grained structure planning.
		<ul style="list-style-type: none"> Housing Choice 	-	-
		<ul style="list-style-type: none"> Rezoning Requests 	-	-
22	Mike McKie	<ul style="list-style-type: none"> General approach to growth: Not stated 	-	-

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
		<ul style="list-style-type: none"> Residential Development Capacity 	Accept in part	No changes recommended in response to submission. In the officers' view, retirement housing is still considered residential. Addressed in part by Officers' Report Back report in Section 2.9 and App 3 - economic advice on the retirement market.
		<ul style="list-style-type: none"> Rezoning Requests 	Accept in part	Officers report recognizes the significant infrastructure issues in proposal to rezone the Ōākura FUZ to General Residential, to allow for the establishment of a retirement village. Addressed in part by officers recommendation to bring forward the Ōākura FUZ feasibility study to 2027/28; and Officers' Report Back additional recommendation to amend the Implementation Plan to adjust the timing for undertaking masterplanning of Oakura South.
23	Westown Agriculture Ltd – Thomas Family	<ul style="list-style-type: none"> General approach to growth: Not stated Residential Development Capacity Rezoning Requests 	- Accept in part Accept in part	- Modelling updated as per submission Addressed through officers' recommendation to include 213 Cowling Road and the portion of 187 Cowling Road (covered by Westown Agriculture site) as part of the Frankley/Cowling FUZ feasibility study; and Amendments to the implementation plan to bring forward the work to commence in July 2024.
24	Warren and Claire Bolton	<ul style="list-style-type: none"> Collaboration opportunities for growth planning Tangata whenua aspirations and outcomes General approach to growth: Not stated Residential Development Capacity 	- Accept in part - Accept ion part	- - - Modelling updated as per submission

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
25	Fonterra Limited	<ul style="list-style-type: none"> Reverse Sensitivity 	Accept	Councils officers' report notes submitter support. No further changes recommended.
		<ul style="list-style-type: none"> General approach to growth: Option 3 - Balanced Focus 	-	-
		<ul style="list-style-type: none"> Rezoning Requests 	Accept in part	Addressed through officers recommendation for a feasibility study to be undertaken in 2026/2027 (in conjunction with NZTA, landowners and developers) to review the most appropriate zoning for the Oropuriri FUZ.
26	GJ Pike and Astron Dales Estate Ltd / Smart 2023 Ltd / Delaco Consulting	<ul style="list-style-type: none"> Collaboration opportunities for growth planning 	Accept in part	Addressed in Councils officers' recommendation by new a "Collaboration" outcome statement, preferred over the "responsiveness" wording sought.
		<ul style="list-style-type: none"> Outcome statements 	Accept in part	Addressed in Councils officers' recommendation by new a "Collaboration" outcome statement, preferred over the "responsiveness" wording sought.
		<ul style="list-style-type: none"> General approach to growth: Option 3 - Balanced Focus 	-	-
		<ul style="list-style-type: none"> Rezoning Requests 	Accept in part	Priority order of FUZ is addressed by officers' recommendation to bring forward the scoping of the feasibility/planning for the Smart Road FUZ to the 2024/2025 financial year.
27	Ben Ingram / Taranaki Housing Initiative Trust	<ul style="list-style-type: none"> PDP impacting development and growth 	Accept in part	<u>Officers Hearing Report:</u> Officers' report acknowledges that the PDP takes a significantly different approach to land use and subdivision from the ODP, and that the degree of change may cause challenges initially. Council considers that many of the matters raised are implementation issues and it will require adjustments, flexibility and the Council and developers working together to embed the new

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
				PDP. Addressed in several officers' recommendations by resolving appeals quickly, establishing a Planning Advisory Group, continual monitoring, undertake a rolling schedule of plan changes and consideration of incentives; and <u>Officers' Report Back</u> : Addressed in Officers' Report Back report (Section 3.3), including an additional recommendation to update implementation plan to schedule an omnibus plan change relating to urban development with a view to notify mid-2025.
		<ul style="list-style-type: none"> • Outcome statements 	Accept in part	Addressed in Councils officers' recommendation by inclusion of new "Health, Safety and Equity" outcome statement
		<ul style="list-style-type: none"> • A regional approach to growth planning 	Accept in part	Addressed in Council officer's recommendation to continue working collaboratively across all councils within Taranaki.
		<ul style="list-style-type: none"> • General approach to growth: Option 3 - Balanced Focus 	-	-
		<ul style="list-style-type: none"> • Housing Choice 	Accept in part	Responding to Homelessness is addressed in part by inserting a new 'equity' outcome into the FDS that the issues relating to access to housing which is affordable can be considered when prioritising for future housing development.
		<ul style="list-style-type: none"> • Rezoning Requests 	-	-
28	Transpower New Zealand	<ul style="list-style-type: none"> • Infrastructure 	Accept	Addressed in Council officers' recommendations to amend the FDS section 3.3 and 5.3 of the FDS supporting technical document with wording agreed between Powerco, Transpower and the Councils; and Amend Infrastructure Constraints map in Appendix 2 of the FDS supporting technical

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
				document, as agreed between Powerco, Transpower and the Councils.
		<ul style="list-style-type: none"> General approach to growth: Option 3 - Balanced Focus 	-	-
		<ul style="list-style-type: none"> Plan-Enabled Capacity 	-	-
29	GJ Gardner Homes Ltd	<ul style="list-style-type: none"> Collaboration opportunities for growth planning 	Accept in part	Accept there is a greater need for information sharing and involvement in Council processes, and; Addressed in part by Officers recommendation for a Planning Advisory Group; and Officers' Report Back additional recommendation to include a section in the FDS titled 'Collaboration and Transparency' which outlines the mechanisms to support collaboration and growth.
		<ul style="list-style-type: none"> Tangata whenua aspirations and outcomes 	-	-
		<ul style="list-style-type: none"> PDP impacting development and growth 	Accept in part	<u>Officers Hearing Report:</u> Officers' report acknowledges that the PDP takes a significantly different approach to land use and subdivision from the ODP, and that the degree of change may cause challenges initially. Council considers that many of the matters raised are implementation issues and it will require adjustments, flexibility and the Council and developers working together to embed the new PDP. Addressed in several officers' recommendations by resolving appeals quickly, establishing a Planning Advisory Group, continual monitoring, undertake a rolling schedule of plan changes and consideration of incentives; and <u>Officers' Report Back:</u>

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
				Addressed in officer's Officers' Report Back report (Section 3.3), including an additional recommendation to update implementation plan to schedule an omnibus plan change relating to urban development with a view to notify mid-2025.
		<ul style="list-style-type: none"> • General approach to growth: Not stated • Residential Development Capacity Plan-enabled Capacity 	-	-
		<ul style="list-style-type: none"> • Rezoning Requests 	Accept in part	<p><u>Officers Hearing Report:</u> Council report agrees with submitters that the starting point for ensuring we have sufficient land available for development is a robust HBCA; and agree that where a piece of land is immediately affected by a SASM/AS/HH or other similar overlay, the areas contained within the extent of these areas should not be counted as being "plan-enabled"; and</p> <p>Addressed in part by officers' recommendation to add a new section setting out how the Councils will assess and monitor capacity, including outline the principles for interpreting plan-enabled, feasible and reasonably expected to be realised development capacity.</p> <p><u>Officers' Report Back:</u> Further addressed in Officers' Report Back Sections 3.4 and 3.5, including additional recommendations.</p>
30	Enviro NZ	<ul style="list-style-type: none"> • Infrastructure • Reverse Sensitivity 	Accept in part	<p>Timings of various FUZ brought forward. Investigations into additional areas identified in implementation plan</p> <p>Additional words added to FDS</p> <p>Submitter point is noted and officers consider it best managed through zoning in the PDP which</p>

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
				manages the compatibility of activities in zones and manages zone interfaces. No changes to FDS recommended.
		<ul style="list-style-type: none"> General approach to growth: Not stated 	-	-
31	Craig Broomhall and Palmbrook Developments Ltd	<ul style="list-style-type: none"> Collaboration opportunities for growth planning 	Accept in part	Accept there is a greater need for information sharing and involvement in Council processes, and; Addressed in part by Officers recommendation for a Planning Advisory Group; and Officers' Report Back additional recommendation to include a section in the FDS titled 'Collaboration and Transparency' which outlines the mechanisms to support collaboration and growth.
		<ul style="list-style-type: none"> General approach to growth: Option 3 - Balanced Focus 	Accept	Support noted
		<ul style="list-style-type: none"> Plan-enabled Capacity 	Accept in part	Submission points acknowledged and addressed in part by Council's recommendations for working collaboratively with developers; and A new section setting out how the Councils will assess and monitor capacity, including outline the principles for interpreting plan-enabled, feasible and reasonably expected to be realised development capacity. Further addressed in Officers' Report Back Sections 3.4 and 3.5, including additional recommendations.
		<ul style="list-style-type: none"> Rezoning Requests 	Accept in part	Priority order of FUZ is addressed by officers' recommendation to bring forward the scoping of the feasibility/planning for the Smart Road FUZ to the 2024/2025 financial year.

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
32	Luke Conroy	• General approach to growth: Not stated	-	-
		• Residential Development Capacity	-	-
		• Rezoning Requests	Accept in part	Request to rezone land at 521 Carrington Road will be included in the Carrington South investigatory piece of work of the FDS implementation plan, scheduled in the 2028/2029 financial year. Outcomes of this investigation to be included in the next FDS.
33	Raukura Salisbury / Ngā Kaitiaki O Puketapu Hapū Trust	• Outcome statements	-	-
		• Tangata whenua aspirations and outcomes	Accept in part	Amendments made to outcomes
		• General approach to growth: Not stated	Accept in part	Submitter concerns of Option 2 – the Greenfield focused is noted in officers report.
34	Donna Eriwata / Otaraua Hapū	• Tangata whenua aspirations and outcomes	Accept in part	The FDS Implementation Plan includes upgrades to Three Waters infrastructure, aligned with the LTP. Officers are happy to provide any information on their plans and programmes for different catchment areas. Addressed in Councils officer’s recommendation to investigate accelerated structure planning, future urban planning and papakāinga in partnership with iwi and / or hapū through the Ngā Kaitiaki Roopū,
		• General approach to growth: Not stated	-	-
35	Hywel Edwards	• General approach to growth: Option 3 - Balanced Focus	Accept	Support noted.
		• Rezoning Requests	Accept in part	Addressed through officers’ recommendation to include 213 Cowling Road and the portion of 187 Cowling Road (covered by Westtown Agriculture site) as part of the Frankley/Cowling FUZ feasibility study; and

Table of Submitters and Key Issues				
Number	Name	Key Issue	Officers Rec	Comments
				Amendments to the implementation plan to bring forward the work to commence in July 2024.
36	Mitchell Ritai / Te Rūnanga o Ngāti Mutunga	<ul style="list-style-type: none"> Tangata whenua aspirations and outcomes 	Accept in part	<p>Addressed in Councils officers' recommendation by recommended amendments to "Choice" outcome and new "Partnering with Tangata Whenua" outcome statement (in Officers' Report Back).</p> <p>Addressed in Council Officers' Report Back recommendation (section 2.5) to amend the FDS Implementation Plan to include a project around Māori growth planning and the Urenui / Onaero Wastewater project over the years 2024-2031.</p>
		<ul style="list-style-type: none"> General approach to growth: Option 3 - Balanced Focus 	Accept	Support noted
37	David Richards (BLANK)	N/A	Reject	N/A

CLOSING KARAKIA

TE WHAKAEATANGA

Te whakaeatanga e,	It is completed, it is done,
Tēnei te kaupapa ka ea,	We have achieved our purpose,
Tēnei te wānanga ka ea,	Completed our forum,
Te mauri o te kaupapa ka whakamoea,	Let the purpose of our gathering rest for now,
Te mauri o te wānanga ka whakamoea,	Let the vitality of our discussions replenish,
Koa ki runga,	We depart with fulfilled hearts and minds,
Koa ki raro,	Bonded in our common goal and unity.
Haumi e, hui e, tāiki e.	

This karakia is recited to close a hui or event. It takes us from a place of focus and releases us to be clear of all the issues or tensions that may have arisen during the hui. We are now free to get on with other things.