



New Plymouth District Council
Private Bag 2025, New Plymouth 4342
Email: submissions@npdc.govt.nz

Name of submitter: Ben Lawn
On behalf of: McKinlay Surveyors Ltd
Postal address: 28A Manadon Street, New Plymouth 4310
Email address: ben.lawn@mckinlay.co.nz
Phone number: 021 763 751

SUBMISSION ON PLAN CHANGE 2 (PUKETAPU STRUCTURE PLAN DEVELOPMENT AREA)

1. Introduction and Standing

McKinlay Surveyors Ltd is a New Plymouth-based surveying and planning firm with experience in resource consent, subdivision, and district plan matters within the New Plymouth and Taranaki Regional Council jurisdictions. This submission is made in our capacity as planning professionals with a direct interest in the district's planning framework and the adequacy of the process by which it changes.

In 2024, McKinlay Surveyors performed a peer-review on the New Plymouth District Council Housing and Business Capacity Assessment 2024 ("HBCA") as part of submissions on the Future Development Strategy ("FDS"). That peer review assessed housing capacity across the entire New Plymouth District and specifically identified that titles containing District Plan Overlays such as Sites and Areas of Significance to Māori ("SASM") and/or Archaeological Sites ("ARCH") could not be counted as plan-enabled capacity, because subdivision of those titles is a Discretionary activity under the Part Operative District Plan ("PODP"), amongst many other factors that were not included in the original assessment which impacted the purported land supply. It was on the basis of that peer-reviewed analysis – which identified an insufficient long-term land supply – that NPDC has concluded additional development capacity is required. My original submission and a summary of the peer review are attached as Appendix 1.

Plan Change 2 ("PC2") proposes to address that capacity shortfall by rezoning approximately 24 hectares of Rural Production Zone ("RPZ") land to General Residential Zone ("GRZ") north of the existing Puketapu Structure Plan Development Area ("PSPDA"). The land proposed for rezoning is subject to the same SASM and ARCH constraints that were identified and applied in the peer-reviewed HBCA. NPDC is therefore relying on a capacity deficit calculated by excluding these titles to justify rezoning those same titles, while doing nothing to resolve the underlying constraint. The rezoning does not generate the plan-enabled capacity it is being justified by.

Beyond this foundational concern, the Section 32 evaluation ("s32 report") supporting PC2 contains a number of further material deficiencies, including an inadequate options analysis, reliance on an outdated traffic assessment, an outdated liquefaction analysis, inaccurate wetland mapping, and internal inconsistencies in the airport noise analysis. These are addressed in turn below.

McKinlay Surveyors Ltd opposes PC2 in its entirety and seeks the relief set out in Section 10 of this submission.



2. Ground 1: The Rezoning Cannot Generate Plan-Enabled Capacity – NPS-HPL Clause 1(a) Failure

2.1 SASM/ARCH Overlays on the Proposed Rezoning Titles

The proposed residential rezoning extends across three titles: TND1/288, TND1/289, and Title 138928. All three titles contain SASM and/or ARCH sites listed in Schedule 3 of the PODP:

- TND1/288 contains SASM Site 2046 and SASM+ARCH Site 2047
- TND1/289 contains SASM+ARCH Site 2047
- Title 138928 contains SASM+ARCH Site 2047

Both SASM/ARCH sites are identified without a mapped extent. Under the PODP, an identified SASM or ARCH has an extent defined by a radius from the site's symbol: 200 metres in the General Industrial, Open Space and Recreation, Special Purpose, and Rural zones, and 50 metres in the Commercial, Mixed Use, and Residential zones. All three titles currently fall within the 200-metre rural zone buffer and therefore currently contain parts of SASMs or ARCH sites.

2.2 SASM-R15, HH-R28 and Discretionary Activity Status

Rule SASM-R15 of the PODP provides that “Subdivision of land that contains any part of a scheduled site or area of significance to Māori” is a Discretionary activity. Rule HH-R28 of the PODP provides that “Subdivision of land that contains any part of a scheduled archaeological site” is a Discretionary activity. Both rules trigger on the title – they apply to subdivision of land that contains any part of a SASM or ARCH, not merely to subdivision within the physical extent of the overlay.

Upon rezoning from RPZ to GRZ, the SASM/ARCH buffers on the rezoned portions of those titles would reduce from 200 metres to 50 metres. This means the extent would no longer physically overlap the newly created GRZ land. However, the three titles straddle both zones – their rural portions retain the 200-metre buffer and therefore still contain parts of the SASMs and ARCH extents. Because SASM-R15 and HH-R28 attach to the title rather than to the zone of the land being subdivided, any subdivision lodged over those titles – including subdivision entirely within the new GRZ area – would remain a Discretionary activity. This has been the interpretation enforced by the NPDC Planning Team on subdivision consents since the introduction of these rules.

Rezoning therefore does not resolve this constraint. The Discretionary activity status persists regardless of the underlying zone of the lots being created, because it is the title, not the proposed lot, that contains part of a SASM or ARCH site.

2.3 Consequence for Plan-Enabled Capacity

The National Policy Statement on Urban Development 2020 (“NPS-UD”) requires that plan-enabled capacity be achievable through a process where consent cannot be declined without reference to specific standards. Discretionary activity status means the consent authority has unfettered discretion to decline – it is not plan-enabled capacity for the purposes of the NPS-UD housing bottom lines.

Accordingly, none of the approximately 200 lots proposed to be generated by the rezoning can be counted as plan-enabled capacity under the NPS-UD framework. The rezoning does not produce the capacity it is being justified by.

2.4 Circular Justification – HBCA Peer Review



This circularity is directly evidenced by the HBCA peer review process. In peer-reviewing the NPDC HBCA 2024, McKinlay Surveyors identified the SASM/ARCH overlays on these titles and discounted them from the capacity analysis precisely because subdivision remains a Discretionary activity – a precondition to obtaining any residential yield. NPDC accepted that peer review, which demonstrated an insufficient long-term land supply.

NPDC is now using that peer-reviewed capacity deficit to justify rezoning the very titles that were excluded from the capacity analysis due to the SASM/ARCH Discretionary activity constraint. The rezoning does nothing to resolve that constraint. NPDC cannot rely on a shortfall calculated by excluding these titles to justify rezoning them without addressing the reason they were excluded.

2.5 Failure of NPS-HPL Clause 1(a)

The National Policy Statement for Highly Productive Land 2022 (“NPS-HPL”) permits Tier 2 territorial authorities to allow urban rezoning of highly productive land only if, among other things, the rezoning is required to provide sufficient development capacity to meet demand for housing or business land so as to give effect to the NPS-UD (clause 1(a)).

The proposed rezoning land is classified as Land Use Capability Class 1 and Class 3 highly productive land. Because the rezoning cannot generate plan-enabled capacity – for the reasons set out above – it cannot be said to be required to provide sufficient development capacity to give effect to the NPS-UD. The NPS-HPL clause 1(a) gateway test is not met and the rezoning of highly productive land cannot proceed on this basis.

Notably, the s32 report itself acknowledges at paragraph 23 that changing the activity status of subdivision on SASM-affected sites from Discretionary to Restricted Discretionary was identified in the FDS as a mechanism to increase plan-enabled capacity. The report dismisses this as uncertain but does not explain how PC2 resolves the same problem. The s32 report makes no attempt to engage with the effect of SASM-R15 or HH-R28 on the plan-enabled status of the titles within the proposed rezoning.

3. Ground 2: Inadequate Section 32 Options Analysis

Section 32(1)(b)(i) of the Resource Management Act 1991 (“RMA”) requires an evaluation report to identify and assess other reasonably practicable options for achieving the objectives. The s32 report considers only two options: the status quo, or the proposed rezoning. This binary approach does not constitute an adequate options analysis. The following reasonably practicable options were available and should have been assessed.

3.1 Medium Density Rezoning Within Bell Block

The s32 report provides no analysis of whether existing GRZ areas within Bell Block could be rezoned to Medium Density Residential Zone (“MDZ”) to increase plan-enabled capacity before resorting to HPL rezoning. Rezoning of existing GRZ land to MDZ within the existing urban footprint is directly contemplated by NPS-HPL clause 2(a) as a first-order option – greater intensification in existing urban areas. No assessment of the locational feasibility of MDZ rezoning within Bell Block, or its potential capacity contribution relative to the proposed HPL rezoning, is provided anywhere in the s32 report. This is a material omission.

3.2 Alternative Greenfield Areas with Lower HPL Impact

The s32 report asserts at paragraph 24 that there are no practicable alternatives in the vicinity of the Bell Block locality that would not impact highly productive land. However this assertion is not supported by sufficient evidence or analysis. No assessment beyond including aerial images of the HPL in surrounding areas is provided, and the report does not assess whether other areas in the wider district could contribute to the capacity need,



whether at lower HPL cost or with fewer planning constraints. NPS-HPL clause 2(b) requires the territorial authority to consider rezoning of land that is not highly productive land, and clause 2(c) requires consideration of land with relatively lower productive capacity. The s32 report's treatment of both alternatives amounts to assertion rather than analysis.

3.3 Prioritisation of Future Urban Zoned Areas

The FDS identified Oakura Future Urban Zone South and Smart Road Future Urban Zone as areas scheduled for a potential plan change in 2026. These areas were assessed through the FDS process as appropriate for rezoning to provide capacity and are not subject to the same HPL constraints. The s32 report does not explain why PC2 is being advanced ahead of those scheduled rezonings, nor does it assess whether intensification or development of those areas could satisfy the district's capacity need before this HPL rezoning is required.

The FDS Implementation Plan 2024–2025 stated that only “Investigation of additional adjoining land for inclusion in Puketapu Structure Plan” was to take place in 2024/2025 and does not include any timeframe for a proposed plan change following that investigation (Appendix 2). Progressing a plan change now would require amendments to the FDS Implementation Plan, with potential flow-on effects to the timeframes of other items in the programme. Proceeding with HPL rezoning out of sequence with the FDS work programme, and without assessing those alternatives, is inconsistent with a genuine NPS-HPL options analysis.

3.4 Inadequate Capacity Yield Information

The s32 report states that PC2 will deliver approximately 200 additional lots, based on minimum lot sizes of 400 m² and densities observed in Stage 1. However the report provides no breakdown of what yield each stage of the existing structure plan was intended to deliver, what capacity remains within each stage, or how the proposed additional area relates to those figures. The PODP records yield expectations for the existing structure plan stages – approximately 594 lots across Stages 1 and 2 and approximately 155 lots in Stage 3 – yet approximately 80% of that zoned capacity remains undeveloped after more than ten years. The s32 report does not explain what yield the 24-hectare extension actually adds in net terms after accounting for SASM/ARCH constraints, open space dedications, and stormwater areas. Without this information the capacity need and the proportionality of the HPL rezoning cannot be properly assessed.

The capacity also needs to be assessed as feasible and reasonably expected to be realised under NPS-UD clause 3.2(2), of which there is no analysis in the s32 report.

4. Ground 3: Slow Development Uptake – Need for Rezoning Not Demonstrated

The s32 report states that approximately 130 dwellings have been built within Stage 1 of the PSPDA since the 2014 rezoning – a period of over ten years. The PODP records yield expectations of approximately 594 lots across Stages 1 and 2, and approximately 155 lots in Stage 3, totalling approximately 749 lots across the existing structure plan area. On those figures, approximately 80% of already residentially zoned and staged land within the structure plan remains undeveloped.

PC2 proposes to add approximately 200 further lots through HPL rezoning, with no analysis of this capacity provided under the NPS-UD framework. Before rezoning additional highly productive land, NPS-HPL clause 1(a) and clause 5 require that the rezoning be necessary and that its spatial extent be the minimum necessary to provide the required development capacity. Where approximately 620 lots of already-zoned land remain undeveloped, the case for rezoning further HPL is not made out.



The slow rate of uptake suggests the constraint on housing delivery in the PSPDA is not land supply but rather other factors which have not been assessed. Rezoning additional land does not address those constraints. The s32 report does not engage with the uptake rate or explain why rezoning more land will produce housing outcomes when the existing land supply has not been utilised.

5. Ground 4: Traffic Assessment Is Outdated and Trigger Conditions Have Not Been Met

The s32 report relies on a traffic impact assessment prepared for the original Area Q plan change process (Appendix 5 of the s32 report). That assessment is approximately 12 years old. The s32 report treats it as adequate for PC2 on the basis that housing yields remain consistent with original projections. This reliance is problematic for several reasons.

The original traffic assessment recommended that the right-turn movement at the Wills Road / SH3 intersection be stopped prior to 50 units being occupied within the structure plan area. The s32 report states that approximately 130 dwellings have now been built in Stage 1. That trigger has been significantly exceeded without the recommended intersection treatment being implemented. The s32 report at paragraph 91 characterises the situation as acceptable because yields remain “consistent with those anticipated.” That is not a satisfactory response to an unimplemented safety recommendation.

PC2 also proposes to rezone further GRZ land within Stage 1 of the existing structure plan. This additional GRZ will generate traffic beyond what was assessed in the original report. Road conditions, traffic volumes on SH3, and the wider transport network will have changed materially over 12 years.

An updated traffic assessment is required before PC2 can be adequately evaluated under section 32 of the RMA. The current assessment cannot reliably assess the cumulative traffic effects of the additional rezoning, particularly given the unimplemented intersection treatment and the passage of time since the original assessment.

6. Ground 5: Wetland Mapping Is Inaccurate and Inconsistent with Technical Evidence

The updated structure plan map included in PC2 shows wetland areas that do not accurately reflect the findings of the BTW Watercourse Assessment Report (Appendix 2 to the s32 report). In particular, the proposed structure plan shows an indicative road alignment passing through an area identified as wetland in that assessment. This is an internal inconsistency within PC2's own technical evidence base.

The BTW report is still listed as a draft document. Reliance on a draft technical report to support a plan change that will rezone approximately 24 hectares of land, including open space areas intended to manage wetland values, is inadequate. The report should be finalised and its findings accurately reflected in the structure plan before PC2 is progressed.

Under the National Environmental Standard for Freshwater 2020 (“NES-FM”), resource consent from the Taranaki Regional Council is required for development activities within 100 metres of a natural inland wetland. The structure plan does not accurately depict these 100-metre setback areas, meaning the developable area within the rezoning extent is likely to be further constrained than shown. This affects the yield calculations underpinning the capacity justification for the HPL rezoning.



Additional wetlands were identified by the Taranaki Regional Council during the Proposed District Plan hearings. The s32 report does not address how these wetlands have been accounted for in the proposed spatial layers of PC2.

7. Ground 6: Liquefaction Assessment Is Outdated

The s32 report relies on a liquefaction hazard assessment prepared by GNS Science in 2013 (Appendix 4 of the s32 report) to conclude that no further liquefaction investigation is required prior to rezoning. That report is now over 12 years old.

Since that assessment was prepared, liquefaction assessment practice and methodology have advanced significantly. In 2021, Tonkin & Taylor prepared a district-wide liquefaction study on behalf of NPDC which established updated assessment processes and methodology that engineers undertaking geotechnical work within the district are expected to follow. The s32 report does not reference this 2021 study or explain how the 2013 GNS assessment remains adequate in light of the updated district-wide framework.

NPDC cannot rely on a pre-2021 assessment that predates its own updated district-wide liquefaction methodology to conclude that liquefaction risk has been adequately addressed for the proposed extension area. An updated liquefaction assessment consistent with the 2021 Tonkin & Taylor methodology should be completed before the rezoning is assessed.

8. Ground 7: Airport Noise – Internal Inconsistencies, Reverse Sensitivity, and Prior IHP Recommendation

8.1 Noise Metric Inconsistency

The s32 report discusses airport noise contours in terms of 55 dB Ldn, which is the PODP outer noise control boundary metric. However the rules in the proposed plan change refer to 50 dBA, and the proposed structure plan map shows a noise contour of 50 dB Ldn. These are different metrics applied inconsistently across the s32 report and the plan change documents. The s32 report does not reconcile this discrepancy or explain which contour and which metric governs the reverse sensitivity analysis for the proposed rezoning.

8.2 Proposed Zones Shown Inside the Noise Contour

The s32 report states at paragraph 37 that all proposed residential rezoning is located outside the most recent noise modelling contours provided by Papa Rererangi I Puketapu Limited (“PRIP”). Yet the proposed structure plan map appears to show proposed residential zoning sitting within the 50 dB Ldn noise contour, and the plan change includes a new rule requiring no-complaints covenants for sites within this contour. This is a direct factual inconsistency between the s32 report narrative and the plan change maps. If the proposed rezoning is in fact within the noise contour, the reverse sensitivity analysis in the s32 report is incorrect and the plan change documents are internally inconsistent.

The s32 report also notes that the noise contours currently shown in the PODP were prepared in 1998. Relying on 1998 contours for the s32 analysis while simultaneously referencing more recent PRIP modelling that is not publicly available or appended to the report is unsatisfactory. The relevant contours should be published as part of the plan change process.

8.3 No-Complaints Covenant – Legal Efficacy and Future Airport Operations

The plan change proposes requiring no-complaints covenants on new titles created within the noise contour area. The s32 report provides no analysis of the legal efficacy of this mechanism. More fundamentally, even if such covenants are legally effective as against



current and future owners of the burdened titles, they would bind those owners only in relation to existing airport activities at the time of their creation. They would not protect the airport against reverse sensitivity effects arising from future operational changes.

If PRIP seeks to expand or upgrade airport operations in the future – for example through extended runway operations, increased flight frequencies, or new flight paths – and those changes result in an expanded noise contour that overlaps with dwellings established under PC2, those residents would not be prevented by a no-complaints covenant from opposing the airport's expansion through RMA processes. A landowner cannot be stripped of their statutory right to participate in future resource management processes by a covenant relating to current activities. PC2 would therefore create a buffer of established residential development that could constrain the airport's future operational flexibility – precisely the reverse sensitivity outcome the covenant is intended to prevent.

This is a significant omission in the s32 analysis given that PRIP is a Council Controlled Trading Organisation of regional significance. The long-term operational needs of the airport should be a material consideration in the reverse sensitivity assessment, not merely its current activities.

8.4 Prior Independent Hearings Panel Recommendation

During the Proposed District Plan hearings, the Independent Hearings Panel ("IHP") considered rezoning of land in close proximity to the New Plymouth Airport and recommended that land remain in the Rural Production Zone due to reverse sensitivity concerns with airport operations. PC2 proposes to rezone materially the same land that the IHP recommended should remain rural.

The s32 report does not engage with this prior recommendation, does not identify what has changed since the IHP decision, and does not explain why a different outcome is now appropriate. This is a material gap in the evaluation. The IHP's reasoning on reverse sensitivity was accepted by NPDC – that reasoning applies with equal force to PC2.

9. Summary of Concerns

In summary, PC2 is deficient in the following respects:

1. The proposed rezoning cannot generate plan-enabled capacity under the NPS-UD because subdivision of all three affected titles remains a Discretionary activity under SASM-R15 and HH-R28, regardless of the rezoning. The NPS-HPL clause 1(a) gateway test is therefore not met.
2. NPDC has used a capacity deficit calculated by excluding SASM/ARCH-affected titles to justify rezoning those same titles without resolving the constraint that caused the exclusion. This is a fundamental circularity.
3. The s32 options analysis is inadequate, considering only status quo or this rezoning, without assessing MDZ intensification within Bell Block, lower-HPL-impact alternatives, or the prioritisation of FUZ areas identified in the FDS.
4. The slow rate of development in the existing structure plan area (approximately 130 dwellings in over ten years from a planned yield of approximately 749 lots) demonstrates that the constraint on housing delivery is not land supply, and that rezoning additional HPL does not address the actual barriers to development.
5. The traffic assessment is 12 years old, a key intersection trigger recommendation remains unimplemented despite being significantly exceeded, and an updated assessment is required.



6. Wetland mapping in the structure plan is inaccurate, the BTW report relied upon is still in draft form, and NES-FM setbacks are not reflected in the developable area calculations.
7. The liquefaction assessment relied upon predates NPDC's own 2021 district-wide updated methodology and cannot be relied upon to conclude that liquefaction risk has been adequately addressed.
8. The airport noise analysis is internally inconsistent, the no-complaints covenant mechanism does not adequately protect the airport's future operational flexibility, and the s32 report does not engage with the IHP's prior recommendation that this land remain rural.

10. Relief Sought

McKinlay Surveyors Ltd seeks the following relief:

1. Primary relief: Deletion of the residential rezoning component of PC2 in its entirety, being the proposed rezoning of approximately 24 hectares from Rural Production Zone to General Residential Zone, on the grounds that it fails NPS-HPL clause 1(a) and the s32 evaluation is inadequate to support the rezoning.
2. Alternative relief: If the residential rezoning is not deleted, that it not proceed until: (a) the SASM-R15 and HH-R28 Discretionary activity status issue is resolved and a revised capacity analysis accurately accounting for SASM/ARCH constraints is completed; (b) an updated traffic impact assessment is prepared; (c) wetland mapping is reconciled with finalised technical evidence; (d) an updated liquefaction assessment consistent with the 2021 Tonkin & Taylor district-wide methodology is completed; and (e) the airport noise contour inconsistency between the s32 report and the plan change maps is resolved.
3. In relation to PC2 as a whole: McKinlay Surveyors Ltd opposes PC2 in its entirety. The spatial layer updates, local centre rezoning, and proposed policy DEV1-P7 are all consequential on or associated with the residential rezoning. If the residential rezoning is deleted, the remaining components of PC2 should be reconsidered in that context.

11. Hearing

McKinlay Surveyors Ltd wishes to be heard in support of this submission. We are not a trade competitor or directly affected by an effect of the subject matter of the submission. If others make a similar submission we would consider a joint case with them at hearing.

Ben Lawn

Planner

McKinlay Surveyors Ltd



Appendices

1. **Appendix 1** McKinlay Surveyors Ltd – FDS Submission and HBCA Peer Review Summary (2024)
2. **Appendix 2** FDS Implementation Plan 2024–2025
3. **Appendix 3** New Plymouth Airport Noise Contours – PDP Hearing
4. **Appendix 4** McKinlay Surveyors Ltd – Plan Enabled Development Analysis Map, NPDC Plan Change 2 (May 2026)



SUBMISSION ON NEW PLYMOUTH DRAFT FUTURE DEVELOPMENT STRATEGY 2024-2054

To: New Plymouth District Council (*Council*)

Submitter: GJ Gardner Homes Ltd
Ben Hawke – Franchise Owner
3 Egmont Road, New Plymouth
ben.hawke@gjgardner.co.nz
(027) 311 6114

Submission On: Draft Future Development Strategy 2024 – 2054 (“Draft Strategy”)

Mr. Hawke wishes to speak to their submission.

1. Introduction

- 1.1. This is a submission on the Council’s Draft Future Development Strategy 2024-2054 (Draft Strategy) by McKinlay Surveyors on behalf of GJ Gardner Homes Ltd who welcome the opportunity to provide feedback on the Draft Strategy.
- 1.2. GJ Gardner Homes Ltd are the leading building company in New Plymouth with the highest volume of new builds in the district. They are involved directly in the development activities of New Plymouth and have extensive experience and knowledge of the feasibility and capacity of the area, as well as the challenges faced by any prospective developer.
- 1.3. GJ Gardner Homes Ltd engaged Mr. Ben Lawn of McKinlay Surveyors to perform a peer review of the 2021 and 2024 NPDC Housing and Business Capacity Assessment and Draft Future Growth Strategy.
- 1.4. The HBA is a requirement under the NPS-UD for every tier 1 and 2 local authority to prepare to determine the future housing and business demand of the district, and determine the available supply to meet this demand. It is also required to assess the impact of planning and infrastructure decisions by the local authority and how that impacts the demand and supply.
- 1.5. The HBA is the most important assessment that informs the FDS, as it outlines whether a district is able to provide enough housing for its people. The FDS then provides a high-level

overview on the broad locations in which this development capacity will be provided to meet the requirements of the NPS-UD, the infrastructure required to provide it and must identify any constraints that impact development.

- 1.6. The peer review of the 2021 and 2024 NPDC HBA Reports have highlighted severe deficiencies in the assessment that will have significant effects on the actual supply of housing in the New Plymouth District.
- 1.7. The HBA reports have included large amounts of land that is not able to be defined as 'plan enabled' under the NPS-UD and has not undertaken analysis of factors that will greatly impact the 'feasibility' of land for development which is also required under the NPS-UD such as topography, district plan overlays and existing infrastructure.
- 1.8. Under the NPS-UD the housing capacity provided for the district must be "Plan-Enabled" as per Section 3.25 below:

3.25 Housing development capacity assessment

(1) Every HBA must quantify, for the short term, medium term, and long term, the housing development capacity for housing in the region and each constituent district of the tier 1 or tier 2 urban environment that is:

- (a) plan-enabled; and*
- (b) plan-enabled and infrastructure-ready; and*
- (c) plan-enabled, infrastructure-ready, and feasible and reasonably expected to be realised.*

- 1.9. The meaning of "Plan-Enabled" is defined in Section 3.4 below:

3.4 Meaning of plan-enabled and infrastructure-ready

- (a) Development capacity is plan-enabled for housing or for business land if:*
- (b) in relation to the short term, it is on land that is zoned for housing or for business use (as applicable) in an operative district plan*
- (c) in relation to the medium term, either paragraph (a) applies, or it is on land that is zoned for housing or for business use (as applicable) in a proposed district plan*
- (d) in relation to the long term, either paragraph (b) applies, or it is on land identified by the local authority for future urban use or urban intensification*

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

1.10. Section 3.4 of the NPS-UD then states the following:

(2) For the purpose of subclause (1), land is zoned for housing or for business use (as applicable) only if the housing or business use is a permitted, controlled, or restricted discretionary activity on that land.

1.11. Under the NPS-UD, land is only able to be considered as part of the housing development capacity if it can be developed as a permitted, controlled, or restricted discretionary activity. This is further reinforced in the definition of “Development Capacity” under Section 1.4 as below:

development capacity means the capacity of land to be developed for housing or for business use, based on:

- (a) the zoning, objectives, policies, rules, and overlays that apply in the relevant proposed and operative RMA planning documents; and*
- (b) the provision of adequate development infrastructure to support the development of land for housing or business use*

1.12. To determine if the land is able to be developed, the local authority must ensure that the development activities are not considered discretionary or prohibited, taking into account the zoning, objectives, policies, rules, and overlays that apply in the relevant proposed and operative RMA planning documents.

1.13. Clarification on the above interpretation was sought from the Ministry for the Environment, with confirmation that this interpretation is correct.

From: Info at MfE <infoatmfe@mfe.govt.nz>
Sent: Friday, March 1, 2024 8:49 AM
To: Ben Lawn <ben.lawn@mckinlay.co.nz>
Subject: RE: NPS-UD Clarification

Kia ora Ben,

Here is the response I was asked to pass on from our Urban Implementation team:

You are correct that the package of relevant planning provisions (including overlays) that impact on the activity status should be taken into account when considering what is counted as plan-enabled development capacity. We would not expect development to be counted if it would not be a permitted, controlled, or restricted discretionary activity.

If you have any follow up questions let me know and I can get you directly connected with the team.

Ngā mihi,

Info@mfe Team

Ministry for the Environment | Manatū Mō Te Taiao

Figure 1: MfE Correspondence on 'Plan Enabled'

- 1.14. The NPDC Housing Development Capacity Assessment 2021 and 2024 Report, or any previous capacity/monitoring reports, have not assessed the development areas and the activity status of such development activities as structures, earthworks or subdivisions. There is no assessment of the Operative or Proposed District Plan Overlays and how they impact the ability to develop the land as a permitted, controlled, or restricted discretionary activity.
- 1.15. The NPDC HBA's have excluded the Operative and Proposed District Plan 'Sites of Significance to Maori' and 'Archaeological Sites' Overlays from determining the 'Plan Enabled' land. This is a major deficiency in the assessment as these two overlays alone impact a vast area of land in the district.
- 1.16. For this reason, the peer review has analysed the relevant overlays/rules of the Operative and Proposed District Plans to determine the land available for development as a less than discretionary activity and subsequently can be determined as 'Plan Enabled' under the NPS-UD. The available areas were then analysed taking into account the physical characteristics of the sites, including existing buildings, Significant Natural Areas, wetlands, existing infrastructure on sites (NPDC or Third-Party Pipelines), and topography. A comprehensive GIS model was developed to determine the number of sites that could be developed as infill or within future urban zones, undeveloped residential land and rural lifestyle zones.
- 1.17. A presentation summarizing the peer review and the subsequent findings is attached to this application as well as a link to the GIS model. We are willing to discuss this model in further detail and provide any subsequent data that the panel wishes to review.

2. Summary and Recommendations

- 2.1. In summary the findings of the peer review show large amounts of 'Plan Enabled' sites included by NPDC that are discretionary due to district plan overlays, 'feasible' sites that are located on steep terrain that would make any housing construction unviable and infill sites that are located directly above NPDC three waters infrastructure.
- 2.2. When calculating the capacity of available capacity for housing development taking into account the factors that were excluded from the NPDC's HBA's, there is an estimated **housing deficit** of approximately 1,488 dwellings. This model is considered to be over-generous on the availability of many sites and therefore the deficit is considered to be greater in reality.
- 2.3. These findings match the occurrences and downturn in construction/development being experienced by GJ Gardner Homes Ltd and the development sector, with businesses closing or moving from the district due to the challenges faced in the simplest of developments.
- 2.4. The New Plymouth Proposed District Plan has taken any certainty for development away from landowners and developers, resulting in stagnation within the district that will only increase in the coming years. This has been caused by over-reaching and bureaucratic rules that result in nearly every development activity becoming fully discretionary which subsequently remove the certainty that applicants need to progress.
- 2.5. As detailed in the attached presentation, the consultation from NPDC with the development sector has been minimal and closer to non-existent, despite being a requirement under the NPS-UD. The 2021 and 2024 HBA reports were compiled and released without any involvement from the development sector, and only one meeting was held last December to briefly discuss the FDS, with no follow-up or further engagement.
- 2.6. Many owners of FUZ or large greenfield land have also never been contacted by NPDC despite this being a requirement and even an example in the MfE Guidance on HBA Assessments document.

Example 2: Tauranga's engagement with greenfield developers and landowners

In 2019, Tauranga City Council commissioned Veros Property Services (Veros) to independently review residential development capacity, as developers and council staff believed Tauranga had insufficient development capacity to meet demand.

As part of the review, Veros contacted large greenfield landholders (considered those that could provide 20+ dwelling capacity) to discuss their development intentions, including whether they planned to develop in the near future. This information was used to better inform greenfield capacity estimates.

Many of these landholders were already part of the SmartGrowth Development Forum, which made it easier to speak about future development. The intentions of landholders were added to a database of resource consents and estimated yields.

When Veros modelled residential development capacity using landholder intentions, they found a shortfall of capacity due to the idiosyncratic preferences of landholders.

Figure 2: MfE Implementation Guidance Excerpt

2.7. When evaluating the available land for development, there is an overreliance by NPDC on infill to meet the housing demand. The uptake of infill and the rate at which it will occur has been vastly overestimated in the HBA reports and subsequently the FDS. In the extensive experience of GJ Gardner Homes Ltd, further greenfield development is required to provide for the required capacity.

2.8. The NPS-UD states that when there is insufficient development capacity the local authority must immediately notify the Minister for the Environment, change any RMA planning documents that are causing the insufficiency and consider other options for increasing or enabling development.

3.7 When there is insufficient development capacity

- (1) If a local authority determines that there is insufficient development capacity (as described in clauses 3.2 and 3.3) over the short term, medium term, or long term, it must:
 - (a) immediately notify the Minister for the Environment; and
 - (b) if the insufficiency is wholly or partly a result of RMA planning documents, change those documents to increase development capacity for housing or business land (as applicable) as soon as practicable, and update any other relevant plan or strategy (including any FDS, as required by subpart 4); and
 - (c) consider other options for:
 - (i) increasing development capacity; and
 - (ii) otherwise enabling development.

2.9. To alleviate these risks and provide certainty for the residents of New Plymouth District the following is recommended:

2.9.1. GJ Gardner Homes Ltd is aware of the submission made by Landpro Ltd and supports all recommendations made in their submission which align with the issues raised in this submission.

2.9.2. An accurate HBA assessment needs to be undertaken immediately with involvement with industry experts to determine a realistic assessment of the development capacity of New Plymouth District which is a key component to the creation of a FDS.

2.9.3. The New Plymouth Proposed District Plan needs to be altered to allow rules which provide more certainty to landowners and developers, as well as flexibility in allowing development in areas that may not have been specifically defined in the plan.

2.9.4. A defined consultation scope and process with respect to iwi/hapu needs to be created to allow for timely and constructive consultation in the areas where development is anticipated.

2.9.5. Undertake consultation with developers and landowners of Future Urban Zones to identify Future Urban Zones that can be rezoned immediately to allow for development to begin.

2.9.6. Undertake consultation with developers and landowners to identify greenfield sites in the district that are viable and can be developed in a timely manner to provide capacity and address the recognised deficit in housing supply in New Plymouth.



Ben Lawn
Environmental Planner
McKinlay Surveyors
28A Manadon Street, New Plymouth
ben.lawn@mckinlay.co.nz
021 763 751

On Behalf of:
GJ Gardner Homes Ltd
Ben Hawke – Franchise Owner
3 Egmont Road, New Plymouth
ben.hawke@gjgardner.co.nz
(027) 311 6114

National Policy Statement - Urban Development

Future Development Strategy

Ben Lawn - Environmental Planner

National Policy Statement-Urban Development

- ▶ NPS-UD requires local councils to provide sufficient development capacity to meet expected demand for housing and business land over the:
 - ▶ short term (next 3 years)
 - ▶ medium term (3 - 10 years)
 - ▶ long term (10 - 30 years)
- ▶ *Housing and Business Development Capacity Assessment (HBA) performed every 3 years.*
- ▶ *HBA must quantify “plan-enabled” and “infrastructure-ready” capacity.*
- ▶ *Plan-enabled is described as:*
 - ▶ *short term - land that is zoned for housing/business use in an operative district plan*
 - ▶ *medium term - land that is zoned for housing/business use in an operative or proposed district plan*
 - ▶ *long term - land as above, and land zoned future urban use*

NPS-UD Requirements

3.4.(2) For the purpose of subclause (1), land is zoned for housing use only if the housing is a permitted, controlled, or restricted discretionary activity on that land.

- ▶ Fully discretionary activities are not included due to the uncertainty related to gaining a resource consent.
- ▶ Your activity status for housing/development is determined not only by zones, but also by the district plan overlays/rules.
- ▶ This means that whilst your land is within a residential zone, an overlay/rule may result in housing or development being fully discretionary.
- ▶ Parklands is a key area of land that contributes to NPDC's capacity being met. It has been zoned residential for over 30 years indicating it is able to be developed now. An overlay has resulted in this being a fully discretionary activity.
- ▶ NPDC's recent assessments of "plan enabled" capacity has not taken into consideration all overlays/rules within the Proposed District Plan.

NPS-UD Requirements

From: Info at MfE <infoatmfe@mfe.govt.nz>

Sent: Friday, March 1, 2024 8:49 AM

To: Ben Lawn <ben.lawn@mckinlay.co.nz>

Subject: RE: NPS-UD Clarification

Kia ora Ben,

Here is the response I was asked to pass on from our Urban Implimentation team:

You are correct that the package of relevant planning provisions (including overlays) that impact on the activity status should be taken into account when considering what is counted as plan-enabled development capacity. We would not expect development to be counted if it would not be a permitted, controlled, or restricted discretionary activity.

If you have any follow up questions let me know and I can get you directly connected with the team.

Ngā mihi,

[Info@mfe Team](#)

Ministry for the Environment | Manatū Mō Te Taiao

District Plan Overlay/Rules

- ▶ Proposed District Plan:
 - ▶ Sites and Areas of Significance to Māori (SASM)
 - ▶ Archaeological Sites
 - ▶ Heritage Buildings/Sites
 - ▶ Notable Trees
 - ▶ Significant Natural Areas
 - ▶ Coastal Flooding
 - ▶ Fault Hazard
 - ▶ Coastal Erosion
 - ▶ Flood Plain
 - ▶ Subdivision Rules

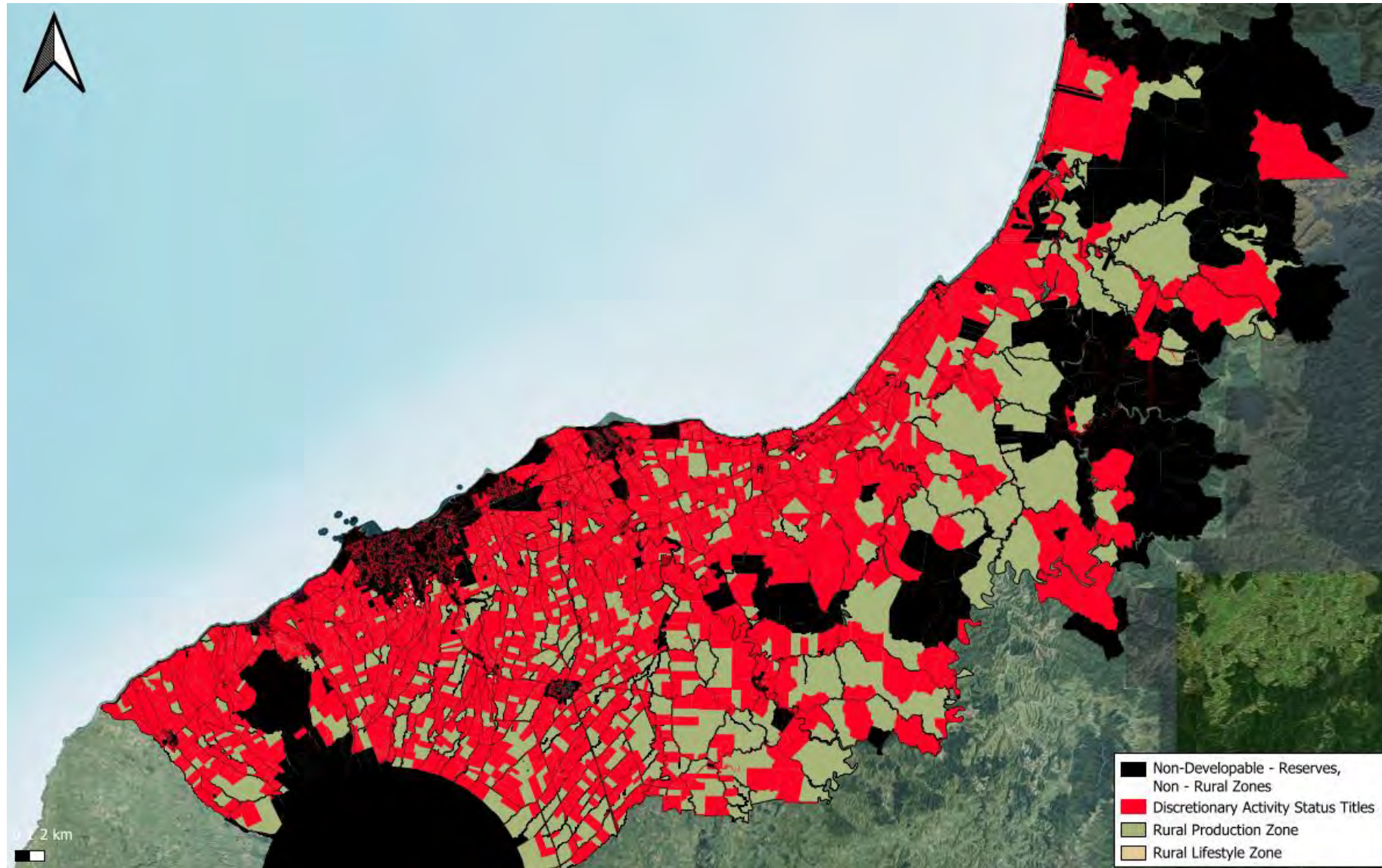
- ▶ The below overlays/rules were not considered in the capacity assessments:
 - ▶ Sites and Areas of Significance to Māori (SASM)
 - ▶ Archaeological Sites

SASM & ARCH Overlays

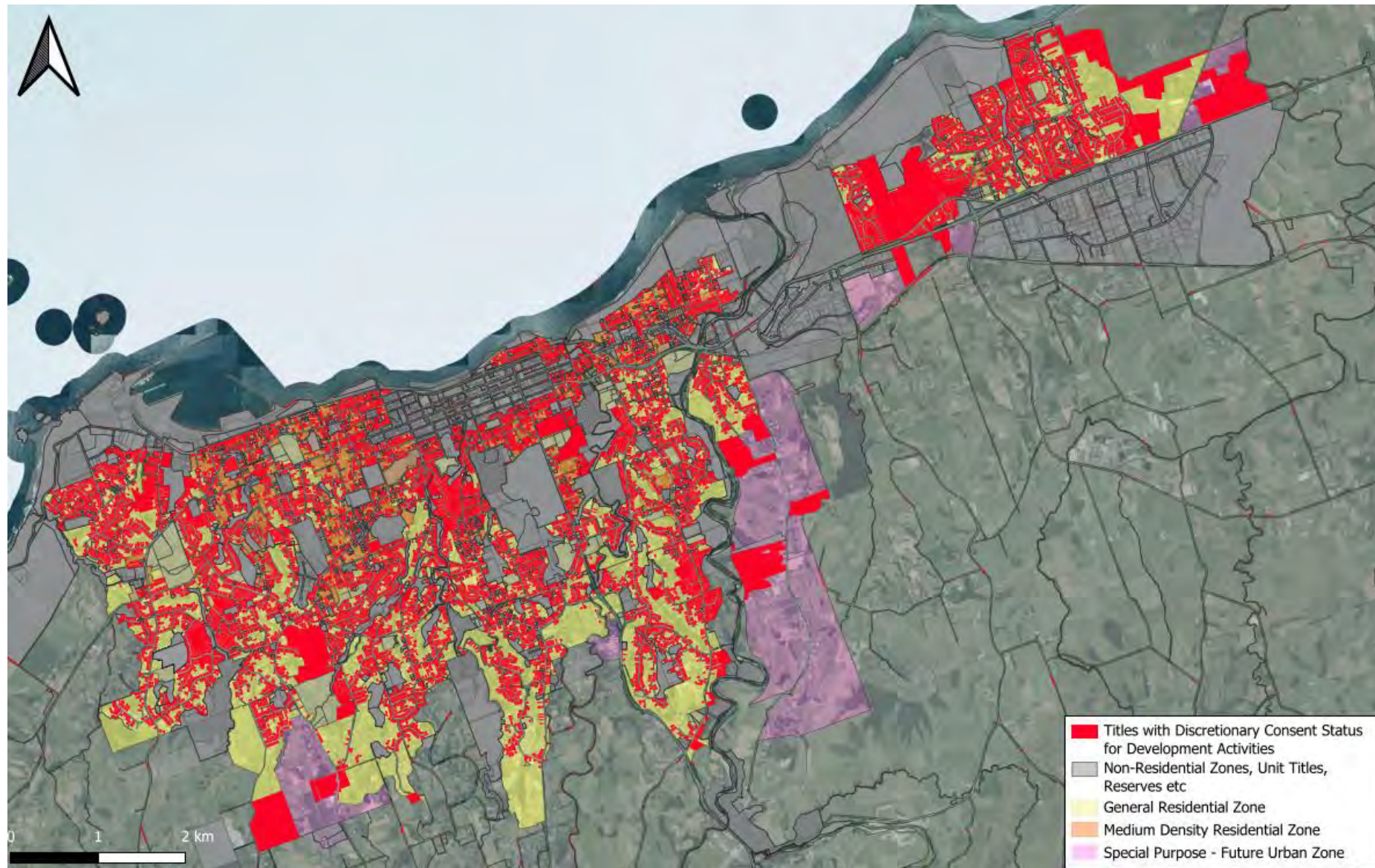
- ▶ Increased from 725 in the ODP to 1058 sites in the PDP
- ▶ 66% of these sites have an unmapped extent.
- ▶ This means a 200m buffer is applied in the Rural Zone and 50m buffer in Residential Zone.
- ▶ Any development activity within these areas is Fully Discretionary
- ▶ 10,500 property titles affected



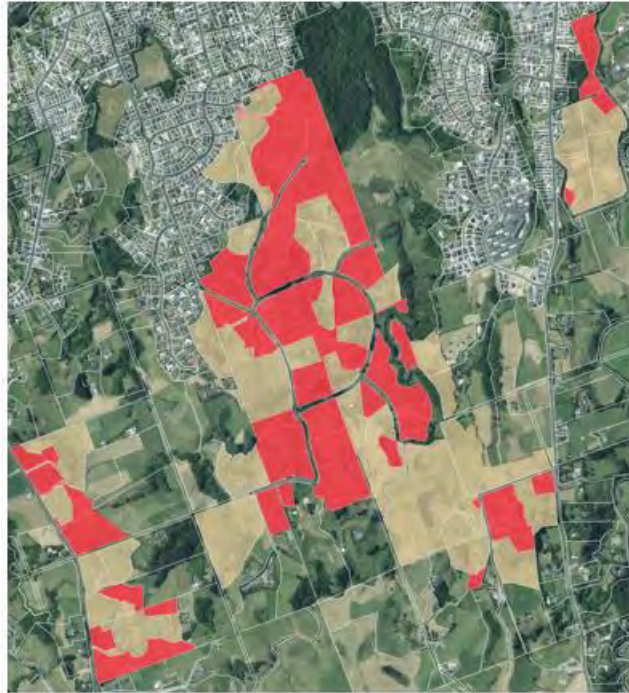
Rural Fully Discretionary Activity Status



Residential Fully Discretionary Activity Status



Rural Lifestyle Discretionary Activity Status



Infill Development

- ▶ 54% of New Plymouth's housing supply for the next 10 years relies on infill.
- ▶ NPDC performed a GIS study showing potential infill sites in New Plymouth as part of the capacity assessment.
- ▶ The infill sites identified by NPDC considered the following aspects that affect development:
 - ▶ Designations, Esplanade Reserves, Local Purpose Reserve, Recreation Reserve and Scenic Reserve
 - ▶ NPDC land used for community Halls, reserves, and sports clubs
 - ▶ Removed areas affected by the overlays:
 - ▶ Heritage Buildings
 - ▶ SNA's
 - ▶ Coastal Flooding
 - ▶ Fault Hazard
 - ▶ Coastal Erosion
 - ▶ Flood Plain
- ▶ Did not include SASM/ARCH sites, topography, stormwater flooding overlay and existing infrastructure

Infill Development

- ▶ The 2021 HBA report has example of infill with sections on heritage sites which should have been removed
- ▶ Due to concerns from these snapshots, the GIS data was requested from NPDC through a LGOIMA



Figure 4.16 – Snapshot of potential infill development within New Plymouth District



Infill Development

- The 2024 HBA report has an example of infill which does not take into account infrastructure or slope



Figure 4.15 – Snapshot of plan-enabled potential infill development within New Plymouth District



Statute:

[Referenced] Classification of a Reserve for historic reserve purposes [Whakawhitiwhiti Pa Historic reserve] New Zealand Gazette 2021 In 3527 Classifies the reserve for historic reserve purposes and forms part of Whakawhitiwhiti Pa Historic reserve

[Referenced] Historic Reserve subject to the Reserves Act 1977 the, Land Transfer Act 2017 Instrument 12012090.1

Parcel

Current

Status:

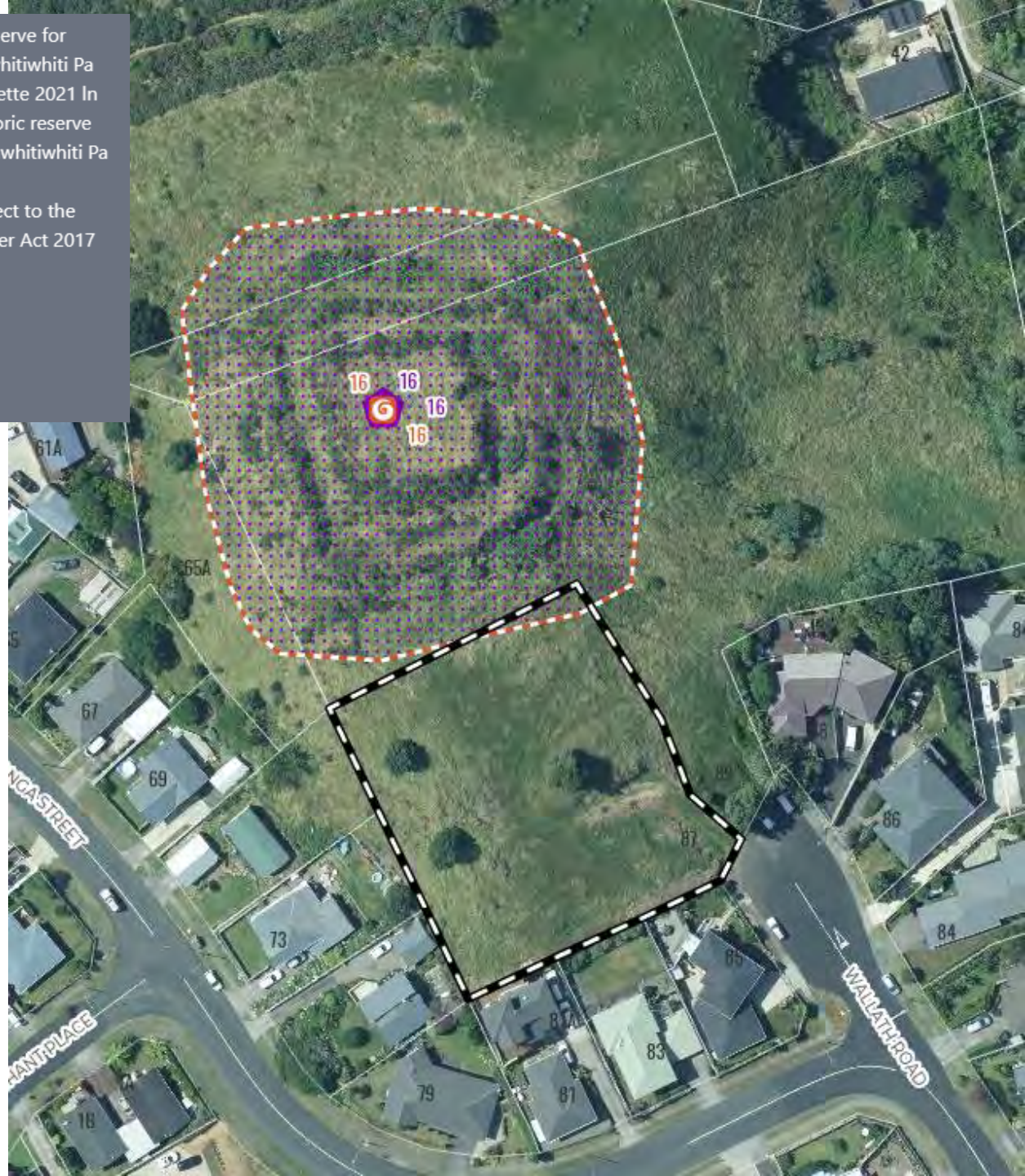
Titles:

[TNH2/1142](#) [Grip](#) [LINZ](#)

Owners:

New Plymouth District Council

8 Plan Enabled Sites



Infill Development

- ▶ The NPDC GIS infill data contained 6800 sites which were considered “plan enabled”.
- ▶ This was provided to Property Economics Ltd for an economic feasibility assessment. The Property Economics Report concluded 3,324 dwellings would be economical to develop.
- ▶ There is no detail on which sites have been removed or considered unfeasible.
- ▶ This data was requested from NPDC Policy Dept - only a table showing the final figures was provided.
- ▶ We cannot provide appropriate submissions into the FGS without this data which is key to understanding infill within New Plymouth

Max Profit Outcome

Notified Zone	Apartments	Standalone	Terraced	Total
General Residential Zone	0	325	1,275	1,600
Low Density Residential Zone	0	10	0	10
Medium Density Residential Zone	690	372	2,690	3,752
Grand Total	690	707	3,965	5,362

Demand Reconciled

Notified Zone	Apartments	Standalone	Terraced	Total
General Residential Zone	0	1,043	132	1,175
Low Density Residential Zone	0	10	0	10
Medium Density Residential Zone	77	1,349	1,070	2,496
Grand Total	77	2,402	1,202	3,681
Unused Capacity	556	0	400	956
Total	633	2,402	1,602	4,637

Realisable

Notified Zone	Apartments	Standalone	Terraced	Total
General Residential Zone	0	889	0	889
Low Density Residential Zone	0	10	0	10
Medium Density Residential Zone	9	1,235	1,181	2,425
Grand Total	9	2,134	1,181	3,324

Infill Development

- ▶ Attached/Terraced dwellings appear to make up the majority of the capacity.
- ▶ The Property Economics Report assumes three dwellings per site in medium density zone.
- ▶ It assesses profit margins which leads to terraced housing being the most profitable option, but does not appear to consider the capital required to achieve this.
- ▶ 2021 HBA Report estimated 92% of new dwellings in the Medium Density Zone would be attached dwellings. This dropped to approx. 50% in 2024 report.
- ▶ 2024 HBA Report requires 15% of all new dwellings from now on to be attached dwellings and 20% by 2035. Our current historic average is 6%.
- ▶ There is a risk that if New Plymouth residents do not uptake attached/terraced dwellings at a high rate, the capacity required will not be met.

Peer Review of Data

- ▶ We have performed a peer review of the capacity of New Plymouth development available, based on the NPDC GIS data, but have removed property titles that are classed as fully discretionary as per the NPS-UD requirement.
- ▶ Structure Zone Areas and Future Urban Zones were reviewed to determine capacity, taking into account all overlays including SASM's, wetlands, SNA's, indicative roads etc as well as topography, existing infrastructure setbacks, boundary setbacks and minimum building platform sizes.
- ▶ <https://felt.com/map/NPS-UD-Feasibility-Assessment-2024-LiHN9AvheSpCQQj44E7TeBD?loc=-39.05633,174.09973,12.6z&share=1>

Peer Review of Available Data

Proposed District Plan	NPDC 2021	NPDC 2024	% Increase/Decrease	2024 Peer Review Data
Residential Zones	6,666	5,946	-11%	4,489
Inner City Development	-	541	-	271
Infill Development	3,074	3,324	8%	2,138
<i>Standalone Dwellings</i>	1,379	2,134	55%	1,089
<i>Attached Dwellings</i>	1,695	1,181	-30%	1,049
Undeveloped Residential Zoned Land	3,592	2,081	-42%	2,081
<i>Standalone Dwellings</i>	2,778	1,670	-40%	1,670
<i>Attached Dwellings/townhouses</i>	814	411	-50%	411
Development Areas	1,298	1,164	-10%	1,103
Area Q/Puketapu	670	647	-3%	573
Johnston Structure Development	-	100	-	141
Patterson Road Structure Development	218	107	-51%	72
Carrington Structure Development	267	231	-13%	222
Junction Stage 1 Structure Development	143	79	-45%	95
Future Urban Zones	4,846	4,245	-12%	3,946
Junction Stage 2 Future Urban Zone	113	82	-27%	57
Frankley/Cowling Future Urban Zone	708	574	-19%	493
Area R Future Urban Zone	61	322	428%	262
Oakura Future Urban Zone	472	433	-8%	254
Waitara Future Urban Zone	313	187	-40%	226
Smart Road Future Urban Zone	3,179	2,647	-17%	2,654
Rural Lifestyle (Not Counted)	181	189	4%	92
Total	12,810	11,355	-11%	9,538

Effects on Development

Period	Supply	Demand
Short Term	5,275	883
Medium Term	5,592	3,953
Long Term	9,538	11,026
	Housing Surplus/Deficit	-1,488

Consultation

3.21 Involving development sector and others

- (1) In preparing an HBA, every tier 1 and tier 2 local authority must seek information and comment from:
 - (a) expert or experienced people in the development sector; and
 - (b) providers of development infrastructure and additional infrastructure; and
 - (c) anyone else who has information that may materially affect the calculation of the development capacity.

Developer perspective

NPDC is working proactively with developers to enable housing supply in New Plymouth. Developers have raised concerns about land supply availability in the region and active speculation for future opportunities.

A key focus with developers is realizing the opportunities to develop already zoned residential land. Feedback from developers has indicated concerns with availability and quality of remaining zoned land for development. Working with developers to realize the opportunities for infill development is also a key focus and opportunity. Having a clear and cohesive growth strategy is outlined in the PDP to ensure a clear pathway for developers.

- ▶ To date there has been only one meeting held with the development sector regarding the FDS.
- ▶ Large landowners of FUZ have not been consulted

Recommendations

3.7 When there is insufficient development capacity

- (1) If a local authority determines that there is insufficient development capacity (as described in clauses 3.2 and 3.3) over the short term, medium term, or long term, it must:
 - (a) immediately notify the Minister for the Environment; and
 - (b) if the insufficiency is wholly or partly a result of RMA planning documents, change those documents to increase development capacity for housing or business land (as applicable) as soon as practicable, and update any other relevant plan or strategy (including any FDS, as required by subpart 4); and
 - (c) consider other options for:
 - (i) increasing development capacity; and
 - (ii) otherwise enabling development.

- ▶ More investigation is required into feasible sites
- ▶ PDP rules need to be altered to provide more certainty to landowners/developers
- ▶ Consultation needs to have a defined scope with a clear pathway



Future Development Strategy for Ngāmotu New Plymouth

2024-2054

Implementation Plan

Introduction

What is the Future Development Strategy for Ngāmotu New Plymouth?

This Future Development Strategy for Ngāmotu New Plymouth (the 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 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.

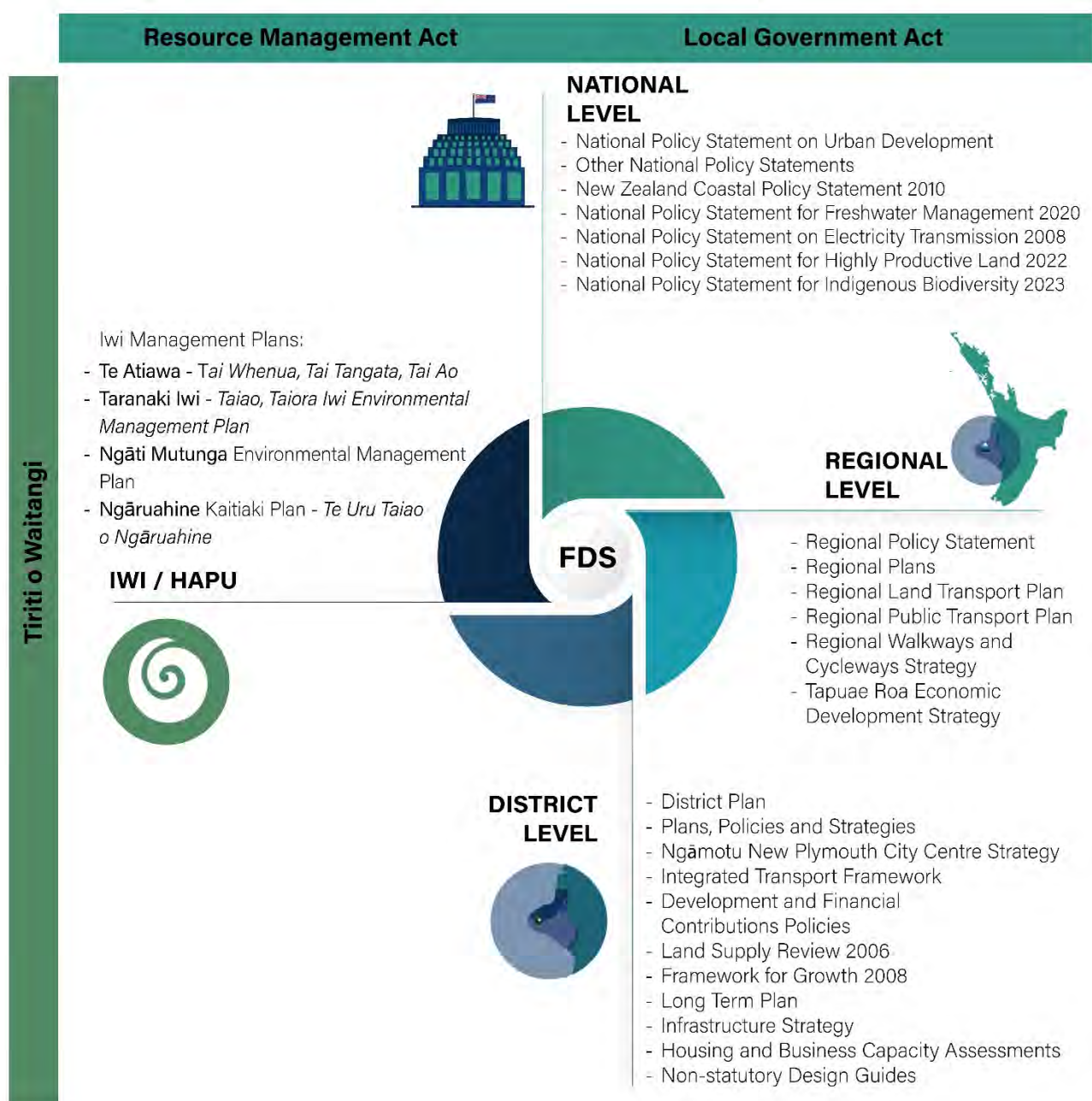
Policy framework - Where does the FDS fit?

The 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.

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

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 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.

FDS Implementation

The 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 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.

The 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 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 FDS form a key component of the 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 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 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 will be reviewed and updated annually.

Monitoring and Review

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

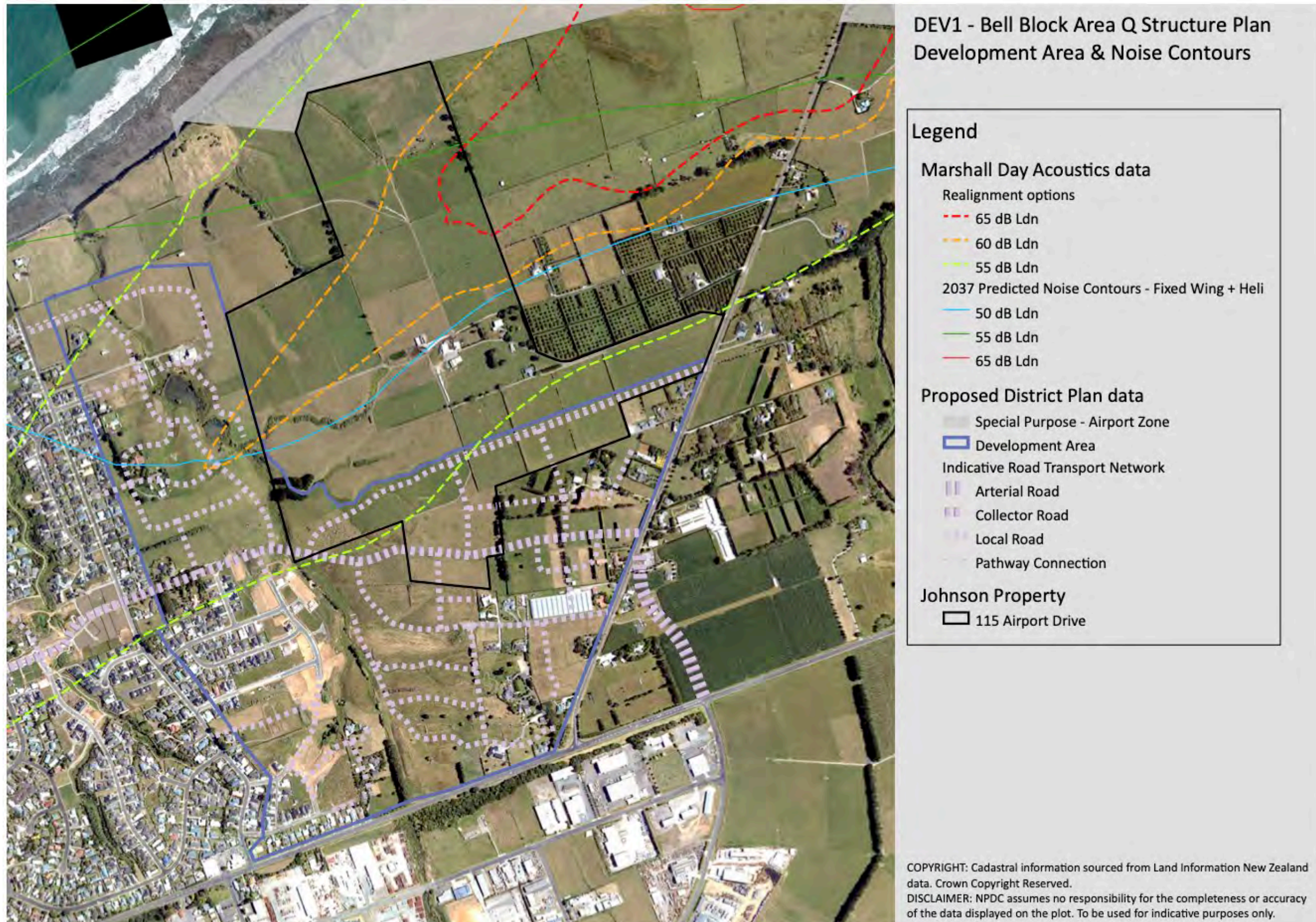
FDS IMPLEMENTATION PLAN			SHORT TERM 0-3 years			MEDIUM TERM 3-10 years							LONG TERM 10-30 years
			24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	2034-2054
KEY													
✔ = Included as a line item in the draft 2024 LTP			● = Structure Plan Development Areas implementation timings										
▶▶ = Funded via the Kāinga Ora Homes and Communities Infrastructure Acceleration Fund			● = Future Urban Zone implementation timings										
⚠ = No funding included in the draft 2024 LTP or Developer-led			● = 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 additional adjoining 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)	✔					●							
- Three Waters: Stormwater modelling completed to inform development	✔					●							

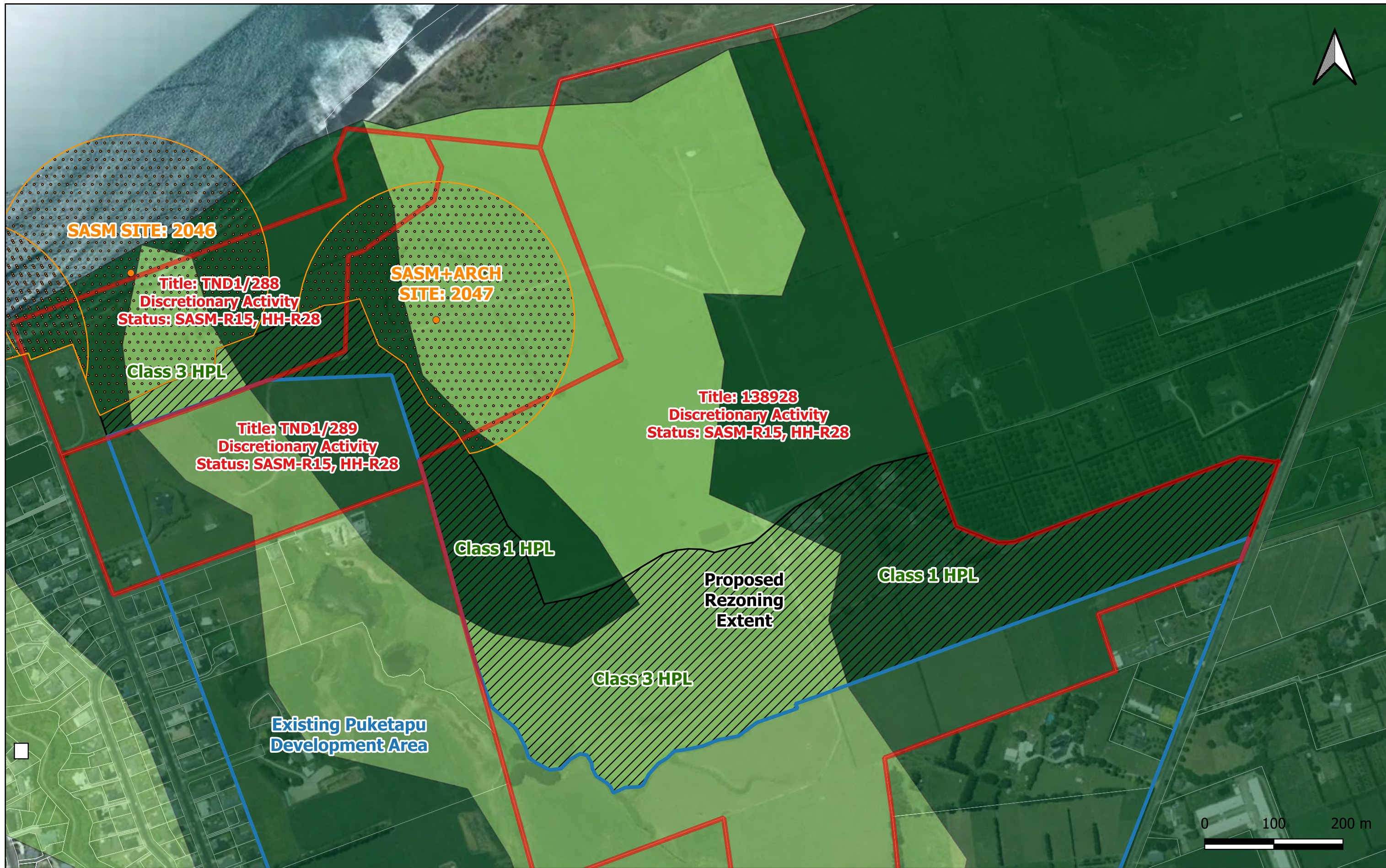
- Three Waters: Stormwater detention ponds	⚠											
- Transport: Potential walkway over water main	⚠											
- Complete finer grained structure planning	✓	●										
Armstrong Ave (Specific Control Area)		24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	2034-2054
- Three Waters: Tangaroa 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 (including consideration of adjoining sites)	✓	●										
- Potential Plan Change					●							
- 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 (Master planning as part of Bell Block Spatial Plan)	✓				●							
- 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 master planning	✓				●							●
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)	✓		●									
- Potential Plan Change for Ōakura South				●								
- 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

- Smart Road FUZ feasibility	✓											
- Potential Stage 1 Plan Change												
- 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
- Oropuriri Road FUZ feasibility (in conjunction with NZTA, landowners and developers to review the most appropriate zoning for the Oropuriri FUZ).												
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	✓											
- 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)	✓											
- 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	
- Māori growth planning project												
- Work with tangata whenua to explore opportunities to develop guidance notes and other documents that provide support and clarity on process and scope issues.												
- Ongoing communication with Ngā Kaitiaki Roopū (including investigate accelerated structure planning, future urban planning and papakāinga in partnership with iwi and / or hapū)												
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
- Development of the Spatial Plan												
- Constraints and hazard assessments												
- Rezoning assessments												
- Investigate the provision and type of industrially and commercially zoned land as part of spatial plan												
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
- Development of the Spatial Plan												
- Investigate the provision and type of industrially and commercially zoned land as part of spatial plan	⚠											
- Assessment of rezoning of 108 Henwood Road, New Plymouth as part of the Bell Block spatial plan.												
- Area R Future Urban Zone master planning												
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
- Development of the Spatial Plan (including investigate the provision and type of industrially and commercially zoned land as part of spatial plan)	⚠											
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 (to investigate the rezoning of land to either RLZ or GRZ)	⚠											

COUNCIL PROCESSES		SHORT TERM 0-3 years	MEDIUM TERM 3-10 years	LONG TERM 10-30 years
- Development of a PDP Implementation Plan to proactively assist change management and to achieve the outcomes sought by the PDP.		●		
- District Plan - Plan Change (omnibus 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 (in collaboration with the Growth Advisory Panel)		●		
- District Plan - Plan Change (plan change specific to SASM/AS)		●		
- Retirement investigation/collaboration				
- Investigation of commercial land and land supply for LFR				
- Establish Ngāmotu Growth Advisory Panel		●		
- Ongoing regular meetings with Technical Professionals Group and Developers Forum				

APPENDIX 3





28A Manadon Street
PO BOX 116
New Plymouth 4340
New Plymouth 06 758 5342
Hawera 06 278 4456
www.mckinlaysurveyors.co.nz

Title

NPDC Plan Change 2: Puketapu Structure Plan Development Area - Plan Enabled Development Analysis

Date	18/05/2026
DWG No	1
Sheet	1 of 1