

SUBMISSION ON NEW PLYMOUTH PART OPERATIVE DISTRICT PLAN

PLAN CHANGE 2: Puketapu Structure Plan development area

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

Submitter Details

Please note that all information provided in your submission, including your personal information, will be made publicly available.

Name of submitter: Ngā Kaitiaki o Puketapu Hapū
On behalf of: Puketapu Hapū
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Trade Competition

Can you gain an advantage in trade competition in making this submission?

Yes ☐

No ☒

Are you directly affected by an effect of the subject matter of the submission that:

- (1) Adversely affects the environment; and
- (2) Does not relate to trade competition or the effects of trade competition.

Yes ☐

No ☒

Council Hearing

Do you wish to be heard in support of your submission?

Yes ☒

No ☐

If others make a similar submission would you consider presenting a joint case with them at a hearing?

Yes ☒

No ☐

Submission

Any attachments to your submission should only be supporting information, not the submission.

PRIVACY ACT NOTE: Please note that all information provided in your submission, including your personal information, will be made publicly available.

Signature of the person making submission
or the person authorised to sign on behalf of the
person making submission
*(Note: A signature is not required if you are making
your submission by electronic means) .*

[insert date]
Date

Introduction

Nga Kaitiaki o Puketapu Hapū acknowledge and commend the Council for progressing PLC02. The process to develop the plan change and engagement between the Puketapu Hapū and Council has in our view set a strong basis for this plan change.

Puketapu supports the intent of Plan Change 2 as it seeks to provide for coordinated urban growth and recognises the significance of the Waitaha Stream and the wider cultural landscape associated with Puketapu. The inclusion of provisions acknowledging tangata whenua values, mātauranga Māori, and the cultural relationship with the area is supported.

However, Puketapu Hapū considers that clarity is required to ensure the plan change takes into account the protection and the restoration of cultural, ecological, and hydrological integrity of the Waitaha Stream and associated wetlands, and to provide greater certainty around future infrastructure development.

Puketapu Hapū seeks stronger direction regarding the number and extent of infrastructure crossings over the Waitaha Stream corridor. While proposed Policy DEV1-P8 refers to limiting infrastructure crossings to “two locations”, the wording lacks clarity and creates uncertainty regarding the intended development outcome.

Accordingly, Puketapu Hapū seeks amendments to DEV1-P8 to:

- clearly define “infrastructure crossings” as there are currently two wastewater pipes that cross the Waitaha: the Waitara main and the area Q sewer. With the additional two proposed crossings this would mean four infrastructure crossings the Waitaha.

The Waitaha Stream is not simply a stormwater receiving environment or physical constraint within the structure plan area. It is a living ancestral waterbody that forms part of the wider cultural landscape of Puketapu Hapū. Protection and restoration of the stream corridor must therefore be treated as a central to the development area, rather than as an ancillary environmental outcome.

The Archaeological Assessment of Effects prepared by Dan McCurdy confirms that the Area Q growth area contains a significant archaeological and cultural landscape associated with Puketapu Hapū, including the Waitaha Stream corridor, wetland systems, terrace landforms, and the wider cultural landscape connected to Otuwetaweta Pā and surrounding areas of historic occupation and use.

Puketapu Hapū considers that the archaeological values identified within the assessment are not isolated features, but form part of an interconnected cultural landscape that continues to hold significance for tangata whenua. These values extend beyond mapped archaeological sites and include waterways, wetlands, traditional movement corridors, wāhi tapu, and areas with potential for buried archaeological material and kōiwi tangata.

While the proposed plan change includes recognition of tangata whenua values and cultural relationships within the structure plan provisions, Puketapu Hapū does not consider it appropriate for the management of archaeological and cultural effects to be deferred solely to future resource consent processes or accidental discovery procedures.

Puketapu Hapū seeks that key archaeological management principles identified within the Archaeological Assessment of Effects be embedded directly into the District Plan framework through strengthened objectives, policies, assessment criteria, and structure plan guidance. This includes provisions relating to:

- avoidance of sensitive cultural and archaeological areas where possible;
- wetland-sensitive earthworks and stormwater design;
- integrated archaeological management planning;
- protection and buffering of culturally significant sites and landscapes;
- minimisation of infrastructure crossings within the Waitaha Stream corridor; and repetitive?
- ongoing tangata whenua involvement in monitoring, cultural management, restoration, and decision-making processes.

Puketapu Hapū supports a precautionary and integrated approach to development within the structure plan area. In particular, the development of the Puketapu Structure Plan Development Area should adopt a whole-of-catchment and culturally-led approach that recognises the interconnected nature of the Waitaha Stream, associated wetlands, archaeological landscapes, and the relationship of tangata whenua with these environments.

Puketapu Hapū considers that embedding these principles within the plan change itself will provide greater certainty for all parties, reduce the risk of adverse cultural and archaeological effects, and better ensure that future urban development occurs in a manner consistent with the protection of cultural heritage, the exercise of kaitiakitanga, and the restoration of the mauri of the Waitaha catchment.

Puketapu Hapū consider that the development of this area could be undertaken in a way which enhances and amplifies the narratives, mātauranga and town planning related provisions in Tai

Tangata, Tai Whenua, Tai Ao. This is reliant on deliberate use of applied cultural expression in public and civic spaces within the plan change area. Plan change provisions must support these outcomes in our view.

Ngā Kaitiaki o Puketapu Hapū

PART / CHAPTER – Part 3: Area Specific Matters / Development Areas / DEV1 – Puketapu Structure Plan Development Area

To view the proposed amendments, refer to the Supporting Documents section on NPDC's [Have Your Say](#) website or lodge your submission online.

The specific submissions and the decisions sought for Plan Change 2: Puketapu Structure Plan Development Area are as follows:

Section-Provision	Support/S upport in Part/Oppo se	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
DEV1-Policies · DEV1-P7 (new)	Support	Puketapu Hapū support the addition of new policy DEV1-P7. As shown in the Geometria report appended to the section 32 report there remains areas of substantial risk of re-discovery of historic heritage, including sites and areas of significance to Māori in this area. This accords with our experience with land development in this location and the rediscovery of sites. Historically there has been an over-reliance on the archaeological record to provide for the protection of historic heritage; this is no longer appropriate in our view. DEV1-P7 provides for a range of outcomes for these areas relative to their context.	Retain as notified. Add additional provisions to implement DEV1-P7, including but not limited to potential Archaeological Site as utilised in other Development Areas in the P-ODP.
DEV-P8 (old DEV1-P7)	Support in Part	Puketapu supports the intent of the policy and requests clarity on the number of	Amend the policy to reference the total number of

		infrastructure crossings of the Waitaha (main stem) as described in our introductory comments.	infrastructure crossing points in DEV1-P7(3).
DEV1-Rules DEV1-R2 Subdivision of an allotment with the Puketapu Structure Plan Development Area	Support		Retain as notified
DEV1-R4 Subdivision of an allotment with the Puketapu Structure Plan Development Area	Support		Retain as notified
DEV1-R8	Support		Retain as notified
DEV1-Structure Plan Figures - Figure 105 (Structure Plan) - Figure 106 (Structure Plan Staging)	Support in Part	As described above, there are additional features in the structure plan area (potential SASM) identified in the Geometria Report. In other Structure Plan Development Areas these are included in the structure plan as Potential Sites and Areas of Significance to Maori. A consistent approach should be adopted for the Puketapu SPDA. Amendment may be required pending the outcome of the number of crossings of the main stem of the Waitaha also.	Amend the structure plan map (figure 105) to include potential SASM as identified in the Geometria report appended to the section 32 Report. Amend the structure plan map (figure 105) to reflect the Waitaha Restoration Plan (location and size of reserve areas and the like).

DEV1-Structure Plan Guidance · Reserves, parks and pathways · Potential local centre zones	Support in part	An additional reference to the Waitaha Restoration Plan should also be made in the structure plan guidance. The restoration plan is considered to provide important and helpful information for plan users regarding the outcomes expected for the Waitaha (including tributaries).	Update the structure plan guidance to include reference to the Waitaha Restoration Plan.
DEV1-Planning Maps · General Residential Zone and Open Space Zone · Local Centre Zone and defined pedestrian frontage · Waterbody – River overlay · Indicative Road Transport Network overlay	Support in Part	Part of the Waitaha stream catchment is already in reserve areas resulting from previous subdivisions. Planning maps should be updated to reflect this. Similarly, as described in the structure plan, the Waitaha, including tributaries, are expected to be retained and enhanced through the process of land development. An open space zoning is considered more appropriate than General Residential for these areas. The reserve area has been defined in a Waitaha Restoration Plan which draws from the BTW and BECA work appended to the Section 32 Report. Puketapu understand that a number of local centres / smaller centres are required to provide for the future community. Further information regarding the proposed locations and how these will operate collectively to support a well-functioning community in the Puketapu /	Extend the open space zoning to include the Waitaha Stream reserve areas shown on the Structure Plan. Refine the size and location of the local centre zone to work as a part of an overall centres approach for the area, inclusive of Puketapu Hapū applied cultural expression outcomes.

		Block area is requested, including how public spaces in these areas may be designed in consultation with Puketapu Hapū to ensure Puketapu narratives form a part of the civic culture of this area.	
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Lodge your submission by:

- Email to submissions@npdc.govt.nz
- Post a hard copy submission to NPDC, Reply Paid DX, DX Box NR59001, New Plymouth
- Hand deliver to the Civic Centre; libraries and services centres at Bell Block, Inglewood or Waitara

Submissions must be with the Council by 5pm on Tuesday 19 May 2026.

What happens with the submissions?

Council will summarise all submissions and publicly notify them so further submissions for or against points raised can be made. If requested by any submitter, Council will hold a hearing on the submissions received, where submitters will have the option to be heard by Council on their submission. Submitters also have the right to appeal the Council's decision, in respect of their submission, to the Environment Court.