



Te Kaunihera-ā-Rohe o Ngāmotu

**New Plymouth  
District Council**

# **FUTURE DEVELOPMENT STRATEGY SUBCOMMITTEE MEETING AGENDA**

**Monday 22 – Wednesday 24 April 2024**

**9am**

Plymouth Room  
Liardet Street, New Plymouth

<b>Chairperson:</b>	Mr Stephen Daysh
<b>Members:</b>	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**

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### **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**

Kia uruuru mai	I draw in (to my being)
Ā hauora	The reviving essence
Ā haukaha	The strengthening essence
Ā haumāia	The essence of courage
Ki runga, ki raro	Above, below
Ki roto, ki waho	Within, without
Rirerire hau paimarire	Let there be peace



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 – Submission Report

END

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## **FUTURE DEVELOPMENT STRATEGY**

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### **PURPOSE/ TE WHĀINGA**

1. The purpose of this report is to present the Officers' report on submissions to the Draft Future Development Strategy for Ngāmotu New Plymouth.

### **RECOMMENDATION / NGĀ WHAIKUPU**

**That, having considered all matters raised in the report, the report be noted.**

### **SIGNIFICANCE AND ENGAGEMENT / TOHUTOHU KAI WHAKAHAERE**

2. This report responds to the matters raised in the recent consultation on the draft Future Development Strategy and in accordance with the Council's Significance and Engagement Policy, the matter is of some importance.
3. Consideration of submissions and adoption of an FDS will be of greater significance.

### **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. The Councils released the first Draft Future Development Strategy for Ngāmotu New Plymouth 2024-2054 (the draft FDS) for public consultation on 6 March 2024.
  7. A total of 36 submissions were lodged. The Future Development Strategy Subcommittee Chairperson has accepted the four submissions which were received after the submission closing date.
  8. Appendix 1 provides Council officers' analysis of the submissions and provides recommendations for the subcommittee's consideration. These recommendations will be provided to submitters prior to hearing of verbal submission on 22-24 April 2024.
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## **CLIMATE CHANGE IMPACT AND CONSIDERATIONS / HURINGA ĀHUARANGI**

9. There are no climate change impacts or considerations in relation to the hearing of submissions.

## **REFORM IMPLICATIONS**

10. There are no reform implications in relation to the hearing of submissions.

## **NEXT STEPS / HĪKOI I MURI MAI**

11. Following the hearing of verbal submissions, the Subcommittee will reconvene to formalise adoption of the Future Development Strategy for Ngāmotu New Plymouth, incorporating amendments as a result of the written and verbal submissions.

## **IMPLICATIONS ASSESSMENT / HĪRANGA AROMATAWAI**

12. This report confirms that the matter concerned has no particular implications and has been dealt with in accordance with the Local Government Act 2002. Specifically:
- Council staff have identified and assessed all reasonably practicable options for addressing the matter and considered the views and preferences of any interested or affected persons (including Māori), in proportion to the significance of the matter;
  - Council staff have considered how the matter will promote the social, economic, environmental, and cultural well-being of communities in the present and the future.
  - Any decisions made are consistent with the Council's plans and policies; and
  - No decisions have been made that would alter significantly the intended level of service provision for any significant activity undertaken by or on behalf of the Council, or would transfer the ownership or control of a strategic asset to or from the Council.

## **APPENDICES / NGĀ ĀPITI HANGA**

Appendix 1 Officers' report on submissions to the Draft Future Development Strategy for Ngāmotu New Plymouth (2024-2025) (ECM 9236475)

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### **Report Details**

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Team:	Governance
Approved By:	Renee Davies (Manager Strategic Planning)
Ward/Community:	District Wide
Date:	16 April 2024
File Reference:	ECM 9234466

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# Officers' Report on Submissions to the Draft Future Development Strategy for Ngāmotu New Plymouth 2024-2054



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# 1 Introduction

1. The Draft Future Development Strategy for Ngāmotu New Plymouth 2024-2054 (the draft FDS) was released for public consultation by the New Plymouth District and Taranaki Regional Councils (the Councils) on 6<sup>th</sup> March 2024. The draft FDS is the first FDS developed by the Councils. The FDS must be updated every three years, and a new one prepared every six years.
2. Developing an FDS is a requirement under the National Policy Statement on Urban Development (NPS-UD) 2020 (updated 2022) for districts like New Plymouth, which are designated as Tier 2 Urban Environments. Both the Councils must work together to ensure their strategic plans support and coordinate growth and development across the district.
3. This report has been jointly prepared by the New Plymouth District Council (NPDC) and the Taranaki Regional Council (TRC), to provide officers' responses to submissions received on the draft FDS.

# 2 Background

4. Officers sought Councils' agreement to the adoption of a Statement of Proposal for community consultation on the FDS in February 2024. Councils were required to use a special consultative procedure under section 83 of the Local Government Act 2002 (the LGA).
5. Engagement and consultation took place with various stakeholders and tangata whenua during the development of the draft FDS and a public submission process took place between 6 March and 8 April 2024.
6. A Future Development Strategy Subcommittee (the Subcommittee) will hear submitters during April 2024. The Subcommittee does not have authority to change the Councils' Long-term Plan (LTP) or infrastructure strategies. However, the Subcommittee's recommendations on infrastructure to be considered as part of LTP funding decisions.
7. The NPS-UD requires the first FDS after the NPS-UD commencement date to be made in time to inform the 2024 long-term plan. Accordingly, the FDS must be adopted by the Councils in time to inform their LTPs, in June 2024.

## 2.1 What is the FDS?

8. The FDS sits within a framework of other documents including Government legislation and policy, Council strategies and plans, and Iwi Environmental Management plans.
9. The NPS-UD sets out the purpose and content requirements for an FDS. This states that the purpose of an FDS is to promote long-term strategic planning by setting out how the Councils intend to:
  - a) Achieve well-functioning urban environments in their existing and future urban areas;
  - b) Provide at least sufficient development capacity over the next 30 years to meet expected demand; and

- c) Assist with the integration of planning decisions under the Resource Management Act (RMA) with infrastructure planning and funding decisions.
10. The FDS is an overarching strategic document that sets out how the Councils will achieve well-functioning urban environments for our district over the next 30 years.
  11. The Councils must have regard to the FDS when preparing or changing its Resource Management Act ('RMA') planning documents. The Councils are also strongly encouraged to use the FDS to inform other Council strategies and plans, in particular, their LTPs, infrastructure strategies, and the Regional Land Transport Plan.
  12. While the FDS will influence future land zoning decisions, there is no certainty that land identified in the FDS for potential future residential or business land use will ultimately be rezoned. Rezoning depends on the necessary infrastructure upgrades being in place, and rezoning occurs through a plan change under the RMA. This involves a public submission process, a hearing and a final decision which can be appealed to the Environment Court.
  13. It is also important to note that the FDS:
    - a) is not a District Plan. The FDS does not contain land use rules or change those that are contained in the District Plan. However, it does identify areas that may be subject to future plan changes, or could be considered for rezoning;
    - b) is not a spatial plan. It can, however, be used to inform one and vice versa;
    - c) is intended to identify and influence where growth should occur, and support the provision of sufficient housing and business development capacity; and
    - d) is not the instrument that secures direct funding for projects within the Councils (that is done through the LTP).
  14. The government is currently undertaking reform of the RMA. The Councils will continue to monitor this process and will respond accordingly.

### 3 Procedural matters

15. Following the close of submissions, a meeting was held with representatives of GJ Gardner Homes Ltd (GJ Gardner #29) and Landpro Ltd (Landpro #19). An additional follow up meeting was held between NPDC, GJ Gardener and Property Economics (NPDC's economic consultants). The intent of these meetings was to better understand the position of these submitters and to narrow areas of disagreement. The outcomes of these discussions are outlined within sections 4.13 – 4.15 of this report.
16. Additionally, a meeting between NPDC, Transpower New Zealand (Transpower #28) and Powerco has been arranged to better understand the matters raised within Transpower's submission, in particular to discuss their submission regarding the capacity of the national grid to support development in the district. The outcomes of this meeting were not known at the time of writing this report, but will be reported back to the Subcommittee at the hearing.

### 3.1 Submissions Received

17. A total of 37 submissions on the FDS were received. One was out of scope of the FDS (Jacob Sorenson (#1) and two submissions are blank (Paul McGrath (#4) and David Richards (#37).
18. For the purposes of reporting on matters raised in submissions, they have been grouped into key issues within this report. A table outlining the key issues and relevant submitters is contained in Appendix 2.

## 4 Key issues and officers' recommendations

### 4.1 Roles and relationships

19. Submissions were received from CGR Developments Ltd (#9) on the draft FDS that related to the role of the Councils and who will be delivering the growth. The Councils have a range of responsibilities and functions under the Resource Management Act 1991 and Local Government Act 2002 in respect of growth and development. These include strategic environmental planning and policy-making, regulating effects of activities on the environment, and the funding and provision of infrastructure. The Councils' role is to promote the social, economic, environmental, and cultural well-being of communities.
20. 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 New Plymouth's Proposed District Plan – Appeals Version (PDP) to realise plan-enabled capacity in well-functioning urban environments.

#### 4.1.1 Collaboration opportunities for growth planning

21. Several submissions on the draft FDS have raised concerns over how the Councils work with the development community (R & R Kalin Partnership #5; Chris Herd #14; "Rachael Cottam - Meadow View Developments #17; Landpro #19; Kāinga Ora #21; Warren & Claire Bolton #24; GP Pike and Astron Dales Estate #26; GJ Gardner #29; Craig Broomhall and Palmbrook Developments Ltd #31). They have indicated there is a greater need for information sharing and for their involvement in Council processes, particularly where these affect the efficient development and release of residential land.
22. In particular, they have raised concerns that the Councils prepare documents such as the Housing and Building Capability Assessment ('HBCA') in isolation, with limited transparency. They have indicated the necessity for input from the development sector and landowners, who are holders of key additional information which can help inform robust assessments of these matters.

23. It is considered that the formal statutory plan-making processes associated with regional and district plans provide important opportunities for the development community to submit and influence growth and development in the district. However, it is acknowledged that taking part in these formal processes is a significant commitment. The Councils welcome feedback from the community, including submissions within formal statutory processes such as the RPS, PDP and FDS, or informally outside of these processes, and endeavour to respond to any feedback.
24. Submissions received on the FDS indicate a lack of confidence in the HBCA. The Councils are committed to improving transparency around processes and to improve and build our growth model with ongoing collaboration with the development community to ensure confidence in the data relied on for growth planning. The Councils intend to actively work to ensure we have sufficient capacity and that the capacity can be realised.
25. Part of NPDCs response to supporting capacity being realised will be continuous improvement in plan administration (resource consenting), including investment in better systems and digital solutions to create efficiencies, and improving consistency in consent processing. This is related to the key performance indicators of NPDC Councillors and is a key focus for NPDC.
26. As noted elsewhere in this report, to help address this and other concerns raised by submitters, Council proposes to establish a Planning Advisory Group of nominated subject matter experts and key developers within the District. The Planning Advisory Group would work alongside Council on any planning/growth related work to ensure direct input and advice is provided to Council officers in development of policy and plans. This group could assist Council with ongoing monitoring of plan controls to identify efficiencies and prioritise future plan changes.
27. Similarly, as outlined within the draft FDS, NPDC will continue to work closely alongside hapū, landowners and developers within structure plan development areas to undertake finer grained structure planning to understand and resolve issues early.
28. There are two existing groups (Technical Professionals Group consisting of architects, planners, surveyors etc) and Developers Forum (landowners and developers) which NPDC holds regular update meetings with. NPDCs intent is to elevate this work and provide more interactive opportunities aligned with a Planning Advisory Group to share and input on key issues.
29. Strategic Planning at NPDC has been restructured to better respond to growth implementation. We are better resourcing growth and changing the way we interact. This new structure will support structure planning, spatial planning, and more fine-grained consideration of areas identified for future growth.
30. Through the new structure Council will engage with landowners with land zoned for Future Urban and Development Areas and the Developers Group to create the right environment to promote information sharing. The Council is open to reprioritisation of rezoning and supporting infrastructure required for growth where developers are ready to invest.

**Recommendation**

- Amend the Draft FDS to include a section titled 'Planning Advisory Group' and outline the establishment, anticipated make-up and purpose of the group including ongoing maintenance.
- Include in the FDS Implementation Plan, as ongoing actions:
  - Continue meeting regularly with the Technical Professionals Group and Developers Forum.
  - Development of a PDP Implementation Plan to proactively assist change management and to achieve the outcomes sought by the PDP.

#### 4.1.2 Tangata whenua relationships

31. The way in which the Councils engage with tangata whenua is an area of continuous improvement. The Ngā Kaitiaki Roopū – a hapū and iwi resource management working group - provided input to the drafting of the PDP and the draft FDS and many hapū and iwi groups presented evidence at the PDP hearings.
32. The PDP has been deliberate in increasing opportunities for engagement with tangata whenua within resource management processes. This is a step change for development in the district. The Councils acknowledge that engaging with iwi and hapū can add cost and time to resource management processes, but consider this engagement is required to accord with the principles of Te Tiriti, and to provide for the cultural wellbeing of tangata whenua.
33. Two of the submissions prepared by Mr Lawn (GJ Gardner #29; Warren and Claire Bolton #24) consider a defined consultation scope and process with respect to hapū and iwi is needed to allow for timely and constructive consultation in the areas where development is anticipated. The submission from Taranaki Housing Initiative Trust (#27) raised the necessity for positive working relationships with iwi and the development community.
34. Iwi and hapū continue to build capacity to participate in resource management processes with support from the Councils. Conversations have begun at Ngā Kaitiaki about how NPDC can best assist and fund iwi and hapū to undertake this work, and this funding has been identified in the draft LTP. It is envisaged that the Planning Advisory Group will provide opportunities for the Councils to assist relationship-building between iwi and hapū and the development community.

**Recommendation**

- Continue regular meetings between Councils and the Ngā Kaitiaki Roopū.
- Include tangata whenua as subject matter experts in the Planning Advisory Group.
- Work with tangata whenua to explore opportunities to develop guidance notes and other documents that provide support and clarity on process and scope issues.



#### 4.1.3 PDP impacting development and growth

35. Taranaki Housing Initiative Trust (#27) submitted it is important to understand how Councils are aligning processes to enable residential growth. The Trust considers there is a perception that Council processes such as consenting do not enable residential growth as proposed in the FDS.
36. The GJ Gardner (#29) submission considers that the PDP has removed certainty for development away from landowners and developers, resulting in stagnation within the district that will only increase in the coming years. They consider PDP rules to be over-reaching and bureaucratic and consider nearly every development activity is fully discretionary which subsequently removes the certainty that applicants need to progress. In their view the PDP should 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.
37. Similarly, the submission of Landpro (#19) considers the FDS should promote flexibility in its planning instruments so that our community is empowered to respond to current and future challenges. They submit our planning instruments are overly bureaucratic. The submission seeks a reframe of the FDS with an 'enabling' lens and then a subsequent review of the PDP, in collaboration with the community.
38. NPDC 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. The 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.
39. The ODP, being an 'effects based' plan, sought to encourage development through flexible and non-directive planning rules. However, this regime created in a number of consequences, such as:
  - a) an increasing trend of activities establishing in out-of-zone areas, impacting urban form and performance;
  - b) retail and office activities locating outside intended zones, affecting the competitiveness of the central city;
  - c) urban activities spreading beyond urban boundaries, fragmenting rural land and impacting future productivity; and
  - d) reverse sensitivity impacting rural and industrial activities.
40. On this basis, NPDC does not support the suggestion by Mr Lawn to bring back flexibility in allowing development in areas that may not have been specifically defined in the plan. It is considered the resource consent process is the appropriate process to consider out-of-zone activities. Alternatively, proposals may be considered under private plan changes.

41. On top of needing to adjust to the activities-based planning framework, consenting has been more complex since 2019 when the PDP was notified as the RMA requires the Council to operate under two district plans. This is a normal phase in the plan-making cycle and NPDC acknowledges it is more complicated and costly than operating under one operative plan. The PDP is currently in the appeal phase and until all appeals are resolved, plan users must consider two district plans. A number of concerns raised through appeals that will result in improvements to the workability of the plan from a development perspective are now being mediated to resolution successfully.
42. NPDC shares the concerns of submitters that the new PDP may be creating issues for development and growth. The introduction of an activities-based framework sought to better manage the consequences that were arising from the effects-based framework (outlined in paragraph 39) but it was intended to also provide certainty and development opportunities. The PDP has a directive strategic policy framework designed to provide housing and businesses in the right locations to meet our community's long-term needs; providing increased certainty on where activities can locate to increase confidence for investment. NPDC acknowledges plan changes to be an appropriate response to finetune plan efficiency, while retaining the direction that housing and business be located in the right locations.
43. New Plymouth now has over 400ha of land zoned for medium density. In relation to these and other urban areas, the PDP provides support for residential infill and business activities with a strong "allow" policy framework in zone chapters for in-zone activities. Housing development in residential zones is supported by a strong policy framework and there are controlled and discretionary rule settings for residential subdivision, restricted discretionary settings for multi-unit development, and the removal of minimum lot sizes for approved and existing development. NPDC acknowledges Mr Lawn's concern about discretionary activity status for many rules, however the policies do the heavy lifting and are very supportive of urban growth in the right places.
44. The feasibility of whether a landowner will take advantage of a property upzoning is dependent on a range of market factors, including construction and development costs, mortgage rates and house prices. The costs and considerations which impede development are not unique to the district. The zoning and rule settings in the PDP are only one part of the picture alongside market conditions, which can change rapidly and significantly impact the feasibility of the uptake of medium density housing development in the district. (Refer to section 4.10 as to how the HBCA considers feasible capacity in determining housing development capacity).
45. NPDC is committed to working closely with the development community and the planning consents team to help them understand the development opportunities provided in the PDP. The following actions have been identified to assist with the implementation of the PDP:
  - e) Development of a PDP Implementation Plan to proactively achieve the outcomes sought by the PDP. The PDP Appeals version was released Sept 2024. The policy shift came first; now we need to bring plan users (including the NPDC consents team) along on that journey.
  - f) Engagement with people who have been upzoned to provide education around the enablement provided in the PDP.

- g) Council is undertaking a Waitara Spatial Plan and the draft LTP is identifying a spatial plan for Bell Block. This work will help to inform new opportunities for these areas ready to be integrated into the next FDS review. Other towns, such as Inglewood, may follow in future.
  - h) Consideration of incentives to enable development, such as revision of development contribution policy and reduced consent fees for multi-unit developments.
46. NPDC acknowledges there are some duplication and efficiency issues in provisions and that some finetuning would make the PDP more efficient. It is normal for plan changes to occur between full plan reviews.
47. It is acknowledged that planning controls play a role in making land available for development. NPDC is listening to the community about where the PDP has duplication, inefficiencies and/or pinch points that are making providing housing and development difficult. Some of the provisions identified which may warrant a plan change include:
- a) Earthworks depth in relation to property boundaries.
  - b) Review of effects standards for residential areas, particularly those relating to internal site amenity, such as the requirement for Outlook Space which we have heard from professionals is a key impediment to infill development.
  - c) Consider changing activity status from fully discretionary to restricted discretionary for certain rules to increase plan efficiency, in particular subdivision rules in overlay chapters and urban zones.
48. Over the life of the PDP and once appeals are resolved and the PDP becomes a fully operative plan, it is intended that NPDC carries out continual monitoring of the plan's efficiency and effectiveness with a view to undertake a rolling schedule of plan changes to resolve identified issues impacting on growth.

**Recommendation**

- 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.
- 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.

## 4.2 FDS Implementation Plan

49. The FDS Implementation Plan provides a framework for prioritising actions over the short, medium and long term and provides guidance on the timing of how and where growth and associated infrastructure will occur.
50. The Implementation Plan will be a key tool for the Councils to respond to matters raised in submissions on the Draft FDS and to respond to feedback in the future as we collaborate more closely with the community, such as through the Planning Advisory Group.
51. Kāinga Ora (#21) supports the Implementation Plan, however suggested some amendments to provide extra detail and clarity. Kāinga Ora would like to see further identification and detailed planning of 'priority' areas within the urban area. Kāinga Ora also suggested spatial mapping as a useful tool to show all growth areas and the indicative sequencing of when these are expected to develop. While officers have not yet completed this work, we agree that spatially mapping these areas will help to illustrate the relationship between the areas and sequencing of line-items in the Implementation Plan. Kāinga Ora's suggestion to include finer-grained structure plans and investigating whether higher densities are achievable, particularly around new local centres is noted.
52. NZTA/Waka Kotahi (#12) also provided suggestions as to how the Implementation Plan might be improved. We acknowledge and agree that the suggestions would improve the Implementation Plan.
53. The Implementation Plan will sit alongside the FDS as a single standalone document, reviewed annually, as required by the NPS-UD. The suggestions in submissions to improve the Implementation Plan will be considered at the time that document is developed more fully (noting its inclusion in the FDS at this time is not required but we consider the information is helpful to the community to understand the Council's current work to align LTP processes).

### Recommendation

- Remove *Figure 14: Draft Implementation Plan* from section 6 of the Draft FDS 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 FDS 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.

## 4.3 Outcome statements

54. The draft FDS includes ten outcome statements for growth that were informed by our understanding of national policy direction, hapū and iwi development aspirations, and community and stakeholder views.
55. Most submitters who commented on the drafted outcome statements were supportive, although some refinement was requested as well as additional statements.

56. Some submissions outlined which outcome statements they consider to be higher priority; that the focus be on infrastructure, choice and capacity, and the achievability of these, because without these ones the other outcomes become irrelevant. Officers do not consider that the statements indicate priority, because all are important for achieving well-functioning urban environments and need to be read as a package. To clarify that the outcome statements are in no order of priority, we suggest they be reordered into alphabetical order.
57. CGR Developments (#9) requested consideration of an outcome statement around who is expected to deliver residential housing. Noting a key theme throughout submissions relates to the relationship between the Councils and development community, officers are supportive of the inclusion of a new outcome statement relating to collaboration.
58. The GJ Pike and Astron Dales Estate submission (#26) suggests a new outcome statement related to 'Responsiveness'. They identify the need to respond in a timely manner to opportunities that arise from local developers and to work with these from a perspective of problem solving as issues come up. Officers agree with the importance of timely collaboration between stakeholders to maintain momentum on projects.
59. The submission from Ngā Kaitiaki O Puketapu Hapū Trust suggests an additional matter to consider within outcome statements is 'Partnership with mana whenua to ensure growth, protection and preservation within our rohe'. A proposed amendment to the 'Tangata Whenua' outcome statement is set out in the Tangata Whenua Aspirations and Outcomes in section 4.4 below.
60. Recognising the role our treaty partners play in development, we suggest the following additional outcome statement and request that tangata whenua submitters comment on the proposed 'Collaboration' outcome statement:

**COLLABORATION**

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

61. Forest and Bird's submission (#10) refers to statements of intent within the Draft FDS, in *Section 3.4 Protecting the Natural Environment*, and they submit that natural environment protection and holistic environmental considerations should be elevated within the Draft FDS.
62. Health New Zealand - Te Whatu Ora (#18) recommend 'Equity', 'Climate Action' and 'Healthy and Safe Community' and associated text be included as additional outcome statements. Officers consider the Draft FDS Outcome Statements: 'Emissions', 'Access', 'Environment' and 'Resilience' already address the matters referred to in the submission regarding 'Climate Action'. However, we do consider there is merit in an outcome dealing with 'Health, Safety and Equity' and recommend the following:

**HEALTH, SAFETY  
AND EQUITY**

Urban development and housing supports equitable health and wellbeing outcomes for the diverse needs of all residents.

- 63. Taranaki Housing Initiative Trust (#27) submitted that a holistic perspective on the ‘Choice’ and ‘Capacity’ outcomes is needed to influence affordable housing. They consider ‘Capacity’ is broad and ‘Land Supply’ and ‘Affordability’ should be incorporated within the outcome statements. We consider that our proposed new outcome above in relation to ‘Health, Safety and Equity’ goes some way to responding to the Trust’s requests, and to the submission of Forest and Bird.
- 64. Officers consider the Draft FDS outcome statements: ‘Access’, ‘Environment’ and ‘Resilience’ encapsulate the primary substance of the Forest and Bird submission. We agree with Forest and Bird that it is appropriate to elevate these matters within the document structure, acknowledging that there is no visibility of the importance of the natural environment to a well-functioning urban environment until page 9 of the Draft FDS.
- 65. R & R Kalin Partnership (#5) seek an outcome statement around feasibility, noting land should be properly investigated and physically sighted before zoning and some areas are unable to be developed without costs outweighing benefits, which results in undeveloped residential land. Feasibility is one component of ‘development capacity’ within the NPS-UD (alongside ‘plan-enabled’, ‘infrastructure ready’ and ‘reasonably expected to be realised’). We consider a slight amendment to the capacity outcome would address the broader NPS-UD tests for having available capacity.
- 66. Mr Herd (#4) requested an outcome statement: ‘*Rigorously investigate some of the constraints to urban development*’ based on his experience that some land previously identified for supply is not suitable due to substantial additional engineering and cost. To investigate is a process rather than an outcome statement. It is considered the result of any investigations feed into the sufficiency of development capacity.
- 67. The Johnson submission (#20) seeks additions to the capacity and infrastructure outcomes to acknowledge the need for feasible infrastructure provision by ensuring the development capacity of growth areas are realised and maximised.
- 68. Officers acknowledge these submissions and officers recommend the following amendments to outcome statements:

<b>CAPACITY</b>	There is sufficient <u>development</u> capacity available to meet the short, medium and long-term housing and business demands <u>in</u> <del>of</del> the district.
<b>INFRASTRUCTURE</b>	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> <del>to integrate with growth and existing infrastructure is used efficiently to support growth.</del>

69. Mr Herd also submitted that the Highly Productive Land outcome statement be amended. It appears his request is attempting to ensure any land rezoned is appropriate in terms of constraints, whereas the National Policy Statement for Highly Productive Land (NPS-HPL) intends to preserve highly productive land for productive purposes. Officers consider that the wording as it appears in the Draft FDS should be retained, as this more accurately reflects the wording and purpose of the NPS-HPL.

**Recommendation**

Amend the Draft FDS by:

- Reordering the outcome statements into alphabetical order.
- Adding an outcome statement for ‘Collaboration’ and ‘Health, Safety and Equity’ as shown above.
- Amending the outcome statements for ‘Capacity’ and ‘Infrastructure’ as shown above.
- Moving the Outcome Statements currently shown on page 21 of the Draft FDS to the Introduction section.

#### 4.4 Tangata whenua aspirations and outcomes

70. A set of statements of hapū and iwi values and aspirations for urban development is included in the draft FDS as required by the NPS-UD. The final wording of these statements was developed by hapū and iwi and the headings are:

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

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

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

*“Using Mātauranga Māori and Māori design principles benefits good urban design outcomes for the whole community”.*

71. No submissions from tangata whenua were received in relation to these statements. However, we did receive four submissions from hapū in relation to related aspects of the FDS (Ngāti Tawhirikura (#6); Ngā Kaitiaki o Puketapu Hapū (#33); Otaraua Hapū (#34); and Te Rūnanga o Ngāti Mutunga (#36).
72. Submitting in respect of Urenui and other townships in its rohe, on behalf of Ngāti Mutunga, Te Rūnanga o Ngāti Mutunga supported the proposed balanced approach to growth because it ensures that growth is maintained within existing urban boundaries and is focused on undeveloped residential land. Like the hapū submissions, Te Rūnanga o Ngāti Mutunga focused on:
- a) a request to recognise strategic housing and other growth aspirations, including papakāinga, to bring uri (descendants) back to their rohe and to reflect these aspirations in the FDS implementation plan; and

- b) a desire to partner with Councils to accelerate well-resourced urban planning in certain townships, structure plan development areas and Future Urban Zones, and on Māori land.
73. Te Rūnanga o Ngāti Mutunga noted that it is important to align infrastructure, such as the Urenui / Onaero Wastewater project (feasibility work currently underway) into the growth discussions and into the FDS Implementation Plan.
74. They also sought an investigation into the feasibility of papakāinga (both zoned and in terms of infrastructure) on areas of Māori land in the medium to long term across the district, but particularly in proximity to Urenui.
75. Importantly, Te Rūnanga o Ngāti Mutunga noted that their comments on growth in terms of urban boundaries and other planning matters do not pertain to development on Māori land because what little Māori land remains has not been the subject of any kind of consistent planning, whether urban or otherwise.
76. The Councils intend to collaborate with tangata whenua to support the development of housing choice to meet their specific housing needs and to enable the development of Māori land in the district.
77. Considering the submissions to allow for a cultural and rohe-based response to urban development and housing for Māori, it is considered appropriate to amend the FDS outcomes 'Choice' and 'Tangata Whenua' as follows:

<p><b>CHOICE</b></p>	<p>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.</p>
<p><b><u>PARTNERSHIP WITH TANGATA WHENUA</u></b></p>	<p><u>Partnership between Councils and tangata whenua provides for urban development and growth, and protection and preservation of form 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 within their rohe.</u></p>

78. Ngāti Tawhirikura (#6) and Otaraua Hapū (#34) sought improvements in catchment management planning to sit alongside urban growth planning. Catchment management planning is led by the Council's Infrastructure Team in partnership with tangata whenua. Land development and subdivision near waterbodies is regulated in the PDP Waterbodies and Subdivision chapters and is included in urban planning processes in that way. 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.
79. Kāinga Ora (#21) suggested that the FDS could spatially identify particular areas of interest to Māori to demonstrate how the strategy enables Māori to realise their aspirations over their land and participate in urban development within the district.



80. The Ministry of Education (#7) requested a change to section 4.2 of the FDS (*Pre-draft consultation*), as follows:

*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.*

81. While officers agree in principle with Kāinga Ora and the Ministry of Education, they recommend that any changes are guided and supported by iwi and hapū.

**Recommendation**

- Through the Ngā Kaitiaki Roopū, investigate accelerated structure planning, future urban planning and papakāinga in partnership with iwi and / or hapū.
- Amend the Draft FDS by amending the outcome statements for 'Choice' and 'Partnership with tangata whenua' as shown above.
- Amend section 4.2 of the draft FDS to reflect the Ministry of Education's focus on supporting iwi/hapū/whānau educational aspirations, providing this is accepted by iwi and hapū.
- Amend the FDS Implementation Plan to include a project around Māori growth planning.

#### 4.5 A regional approach to growth planning

82. The Taranaki Housing Initiative Trust (#27) submitted that it is important that the Taranaki housing market is viewed as one. They see benefit in a Regional Future Development Strategy with Stratford and South Taranaki, regardless of what regulation requires, and suggest there could be scope in the future for collaborative regional spatial planning.
83. Currently the Councils do not have economic evidence in relation to whether to view the Taranaki housing market as one. Prior to the repeal of the Spatial Planning Act, all four Taranaki Councils were commencing work on a collaborative spatial plan and while there is no longer a legal requirement for this, all four Councils continue to work on increased regional collaboration. TRC are currently consulting, through their draft LTP process, as to the community views on the opportunities presented by spatial planning.
84. Submissions made on behalf of Landpro (#19) have indicated a need for the Regional Policy Statement to include criteria as to what plan changes will be treated as adding significantly to development Capacity. Clause 4.1 of the NPS-UD requires these changes to be implemented as soon as practicable. TRC is currently in the process of updating the RPS but the programme is currently deferred to prioritise the development of the Land and Freshwater Regional Policy Statement (RPS) chapter and new Freshwater regional plan. It is anticipated by TRC that the RPS review will be developed and notified to inform the next FDS review.

**Recommendation**

- Continue working collaboratively across all councils within Taranaki.

## 4.6 Natural Environment

85. Forest and Bird (#10) seek increased visibility within the FDS to prioritise growth outcomes that recognise the importance of the natural environment, such as making room for rivers, restoring and protecting wetlands, significant natural areas, green corridors, impervious surfaces, and planting and pest management solutions. The submission considers the FDS should be more aligned with the NPDC Stormwater Vision and Roadmap which embraces *Te Mana o Te Wai*. The submission advocates for community resilience, and 'Nature Based Solutions' as a concept that encapsulates the integration of the built and natural environment.
86. As stated above, hapū submitters identified the need for improvements in catchment management planning to sit alongside urban growth planning.
87. Officers note these matters are embedded across multiple regional and district plans, policies, management plans and operations. TRC administration of the National Policy Statement for Freshwater Management (NPS-FM) is in accordance with these concepts.
88. TRC are in the process of developing a new plan for freshwater in Taranaki to implement the NPS-FM. The current programme is aiming to have a new plan notified in mid 2025. This regime will aim to protect and improve our rivers, streams and wetlands to stop further degradation of freshwater, and will deal with both rural and urban issues.
89. The PDP, the key document for growth and development in the district, includes Strategic Direction (Natural Environment and Urban Form and Development) Chapters, and Part 2: District-wide Matters (including the Natural Environmental Values, Coastal Environment, and Subdivision) Chapters. The PDP direction ensures balance in respect of development and environmental values, recognises and provides for *Te Mana o Te Wai*, human interactions with nature, restoration of environmental values, nature-based solutions, natural defences for hazard management, and making space for water. Low impact design solutions for stormwater management are guided by the Council's Land Development and Subdivision Infrastructure Standard, and the more recently developed NPDC Stormwater Vision and Roadmap supports and complements growth planning and development.
90. 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.
91. Health New Zealand - Te Whatu Ora (#18) also submitted in relation to the benefits for community health and wellbeing (physical and mental health and wellbeing) associated with regular connection with nature and opportunities to interact with and experience healthy ecosystems. The submitter commends the FDS for recognising the links between the urban environment and health and wellbeing in this regard.

### Recommendation

- No change.

## 4.7 Constraints

92. Kāinga Ora (#21) have indicated that while the technical document contains good detail on hazards and constraints, the FDS itself could include maps showing some of the constraints and supporting commentary around how the constraints shape growth and the infrastructure required to enable development in these locations.
93. Considerable thought went into how best to meet the requirements of section 3.13(d)(c) of the NPS-UD requiring that a FDS spatially identifies any constraints on development. The Future Development Strategies Fact Sheet<sup>1</sup> advises that: “Constraints may include hazards, for example, high-risk flood zones or areas with land instability. It may also include areas already protected for their environmental values, or important historic or cultural values.” There is no further guidance on how to spatially identify constraints, and we note that the PDP maps and other GIS systems show many constraints at a property level.
94. It is difficult to show in a meaningful way, at a district wide scale, all known constraints on one map. There are also known and unknown limitations in data availability and quality.
95. The FDS supporting technical document appendices include pages of maps. ‘Appendix 1 Maps Showing Boundaries of New Areas Assessed’ is 32 pages. ‘Appendix 2 Maps Showing District Wide Constraints’ includes seven maps as follows:
- a) Map 1: Highly Productive Land
  - a) Map 2: Hazards and Risks
  - b) Map 3: Natural Environment Features
  - c) Map 4: Rivers
  - d) Map 5: Historic and Cultural Features
  - e) Map 6: Infrastructure
  - f) Map 7: Reverse Sensitivity
96. In response to the Kāinga Ora submission, officers consider the seven district wide maps could be moved from the technical document into the FDS document itself. However, the FDS technical document does form part of the FDS and there are advantages and disadvantages of including them in the FDS itself.
97. Chris Herd (#14), Landpro (#19) and other submissions indicate that constraints to development require greater scrutiny to better understand the supply of land. Mr Herd provided the example of a wide-scale issue in the Bell Block area, which involves a peat layer requiring substantial additional engineering and cost to address for building foundations in order to support the types and sizes of buildings and equipment that industrial activities require. He notes soil contamination and geotechnical issues on zoned but undeveloped industrial land that may restrict its development.

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<sup>1</sup> Ministry for the Environment, [Future Development Strategies](#), July 2020

98. As outlined in section 4.4 of the Draft FDS, all land could contain factors that constrain development to some extent, and many of these can be overcome with appropriate design, acknowledging additional cost. Council officers consider understanding a site's characteristics is a process which gets more fine-grained as development proposals progress through the stages of rezoning, subdivision and construction. Spending vast sums on expertise for detailed investigations of large areas that may not be built upon may be an inefficient use of ratepayer money. However, investigation is sensible, whether Council or developer led. Looking forward, officers consider these sorts of issues to be relevant considerations within structure planning.
99. Forest and Bird (#10) question the approach taken in the 'Evaluation Criteria for New Intensification and Greenfield Areas'. The submission is concerned that the terminology 'less favourable for growth', which was applied to constrained areas such as the Coastal Environment and sites containing waterbodies, does not provide adequate protection of natural features, and "this indicates that fragile and important areas such as wetlands are fair game for a development lens, whatever the cost". 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. It is considered that development in proximity to protected environmental features is possible with the appropriate environmental management, as provided for under resource consents.

#### **Recommendation**

- 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.
- Officers 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.

## 4.8 Infrastructure

100. Submissions relating to infrastructure were generally received from infrastructure providers.

### National Grid and Electricity Transmission Networks

101. Transpower's submission (#28) seeks more clarity to be included in the FDS on matters in relation to the National Grid, which they own and manage as a state-owned enterprise. They seek more information to be included in the FDS on both the effect of the National Grid on development and the counter to that, the effects of development on the National Grid. They also seek the inclusion of more information and assessment of the capacity of electricity networks to support growth in the district.

102. The NPS-UD defines the National Grid as “additional infrastructure”, which means that the FDS must *spatially identify* the Grid in its role of servicing development capacity, as well as mapping the location of the National Grid Corridor and other electricity network infrastructure. Transpower considers that we have not sufficiently met this NPS-UD requirement and that there are errors of fact within the documents, and consequently the FDS and accompanying technical document need further work. These include changes to the section on Climate Change to reflect the significance of the National Grid and transmission network infrastructure and the need for ongoing investment in this infrastructure to achieve a reduction in Greenhouse Gas emissions.
103. Transpower has provided specific wording examples of where they want changes, or additional wording and mapping detail, and we agree in principle with many of these. Transpower have also offered to discuss their submission in more depth, along with Powerco, so that further detail can be recorded accurately and other matters can be clarified. Powerco is not a submitter to the draft FDS.
104. At the time of writing this report, a meeting has been scheduled between the Councils, Transpower and Powerco, to discuss clarification of matters and inclusion of further details in relation to the National Grid and electricity network. Council officers will report back to the Subcommittee in relation to the outcome of this discussion. Officers also recommend that further discussions be held at every FDS update (3 yearly) and at every full review of the FDS (six yearly).

#### **Recommendation**

- Amend the FDS section 3.3 ‘Planning for and Provision of Infrastructure’ of the FDS and section 5.3 ‘Infrastructure Planning’ of the FDS supporting technical document with wording agreed between Powerco, Transpower and the Councils.
- Amend Infrastructure Constraints map in ‘Appendix 2 Maps Showing District Wide Constraints’ of the FDS supporting technical document, as agreed between Powerco, Transpower and the Councils.

#### Transport Infrastructure

105. New Zealand Transport Agency/Waka Kotahi’s (NZTA) submission (#12) highlights the importance of aligning the FDS with other national and regional transport direction, as well as the opportunity to strengthen connections between the FDS and the Integrated Transport Framework.
106. Noting that New Plymouth’s Integrated Transport Framework has not yet been adopted by Council, we have nonetheless ensured that the draft FDS generally aligns with the interventions contained within the FDS. We have worked closely alongside the Council officers preparing the Integrated Transport Framework to ensure this is the case.
107. NZTA have also indicated that there is a lack of detail regarding the transport infrastructure required for individual growth areas within the FDS itself. We note that much of this detail is located within the Implementation Plan, which is considered appropriate. However, we also agree that additional detail regarding the key transport projects for development areas, can be specified within the FDS itself.

108. With regards to the provision of public transport, officers recognise that broad changes will need to be undertaken to the FDS to ensure it better integrates public transport (PT) and 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 draft 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.
109. NZTA also requested the Councils to clarify future development sites that would result in new points of access onto Limited Access Roads (LARs). These are sections of the State Highway that can only be accessed from authorised crossing points.
110. The following growth areas have been identified as being in proximity/adjacent to a limited access section of the state highway network:
- a) Devon Road (SH3) in relation to the Puketapu Structure Plan Area and the Oropuriri and Area R FUZ areas;
  - b) South Road (SH24) in relation to the Oākura West and South; and
  - c) Junction Road in relation to the Junction Road FUZ.
111. In most cases, alternative access points that avoid the limited access sections are likely to be achieved noting that detailed design work on internal transport networks are yet to be undertaken and LARs will be a factor to be considered.

#### Waste Infrastructure

112. The Enviro NZ submission (#30) seeks that Paragraph 3.3 of the FDS ('Planning for and Provision of Infrastructure') needs to include waste infrastructure. They advise that the NZ Waste Strategy lists an action for local government as being "Make sure that planning and consenting processes take account of the need for waste management infrastructure and services". This can include rules in the district plan that allow for waste storage and collection on intensive sites; roads designed for waste collection in the structure plans; and locations for transfer stations, resource recovery facilities and waste disposal that are not subject to reverse sensitivity.
113. Officers consider that appropriate provision for solid waste is required for well-functioning urban environments. We note that waste is not encompassed within the RMA or NPS-UD definitions relating to infrastructure, but solid waste is a function for the Councils to provide leadership on. We support the inclusion of reference to waste management infrastructure and services. This aligns with Councils' functions under bylaws, and the Waste Management Minimization and Public Health Acts.

#### **Recommendation**

- Amend the first paragraph of section 3.3 of the Draft FDS to include reference to waste management infrastructure and services.
- Add key transport interventions from the implementation plan into the body of the FDS.

## 4.9 Reverse sensitivity

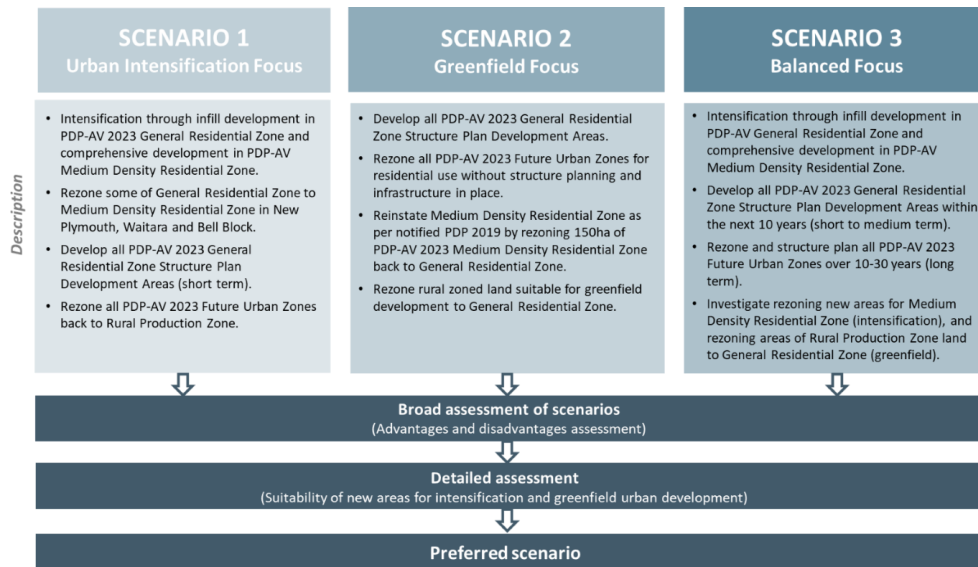
114. NZTA (#12) raised reverse sensitivity concerns for development in proximity to the state highway network by seeking consent conditions on all future lots within 100m of this network. This is a deviation from the approach worked through the PDP hearings, where a modelled State Highway Noise Contour layer was included in the District Plan instead of a blunt setback tool. Council would be interested to understand the additional blanket setback on top of the PDP noise requirements.
115. Fonterra (#25) support the rezoning of the Oropuriri FUZ to General Industrial Zone as industrial activities are compatible land uses to Fonterra's operations at the Fonterra Brands New Plymouth (FBNZ Depot) and therefore reduces the potential for reverse sensitivity effects to occur. This is noted and we agree that when this land is "live-zoned" industrial uses will be most appropriate.
116. The Aggregate and Quarry Association (#15) supported provisions that avoided reverse sensitivity, noting the importance of allowing quarries to operate without risk of complaint. Similarly, a submission received from Enviro NZ (#30) outlined the need for transfer stations, resource recovery facilities and waste disposal to be provided for in a manner that is not subject to reverse sensitivity. These points are noted and best managed through zoning in the PDP which manages the compatibility of activities in zones and manages zone interfaces.

## 4.10 Meeting NPS-UD development capacity requirements

117. The NPS-UD outlines the content requirements for a FDS and what it should be informed by. Part of this is the requirement for long-term strategic planning that provides for at least sufficient development capacity over the next 30 years to meet expected demand. Development capacity is defined within the NPS-UD and relates to the capacity of land to be developed for housing or business use.
118. The FDS must set out how the Councils intend to provide for housing and business demand and identify the broad locations for these areas.

### General Approach to Growth

119. The Draft FDS analysed the advantages and disadvantages of different spatial scenarios and considered whether they provide sufficient capacity, as follows:



120. In respect of the general approach to growth, there was support in submissions for Option 3 - a balanced approach to growth in the district. Out of 34 in-scope submissions, 17 are in favour of Option 3. A total of 15 submitters did not explicitly state their preference for any particular option and focused on development matters in respect of certain areas or rohe, or waterways. The Ministry of Education (#7) supported the FDS and focused on the need for social infrastructure and the importance of early planning for schools in new areas. Like Transpower, it sought some wording changes in terms of information provided in the FDS.
121. Two submitters explicitly favoured Option 1 – the Urban Intensification Focus approach (Nick Field #2 and Victoria Dungan #3). One hapū submitter (Ngā Kaitiaki o Puketapu Hapū Trust #33) expressed concerns regarding Option 2 – the Greenfield focus, as they considered this type of planning had been simplistic in the past. Eight submitters have indicated that there is insufficient residential development capacity, and the FDS should be identifying significantly more greenfield opportunity in the short to medium term (Pat Sole Surveyors Ltd #8; Landpro Limited #19; Mike McKie #22; Westown Agriculture Ltd #23; Warren and Claire Bolton #24; GJ Gardner Homes Ltd #29; and Luke Conroy #32).
122. The submitters who agreed with Option 3 agreed that residential growth should occur across a combination of infill together with well-located greenfield areas. Areas of disagreement arise in relation to the make-up and timing of this growth scenario. Several submitters have indicated that we are placing too much reliance on infill developments, which they consider are less feasible. Others, such as NZTA and Kāinga Ora, have suggested that the FDS should further explore more intensified growth in existing urban areas.
123. These matters will be discussed in the following sections of this report.



#### 4.11 Housing and Business Capacity Assessment

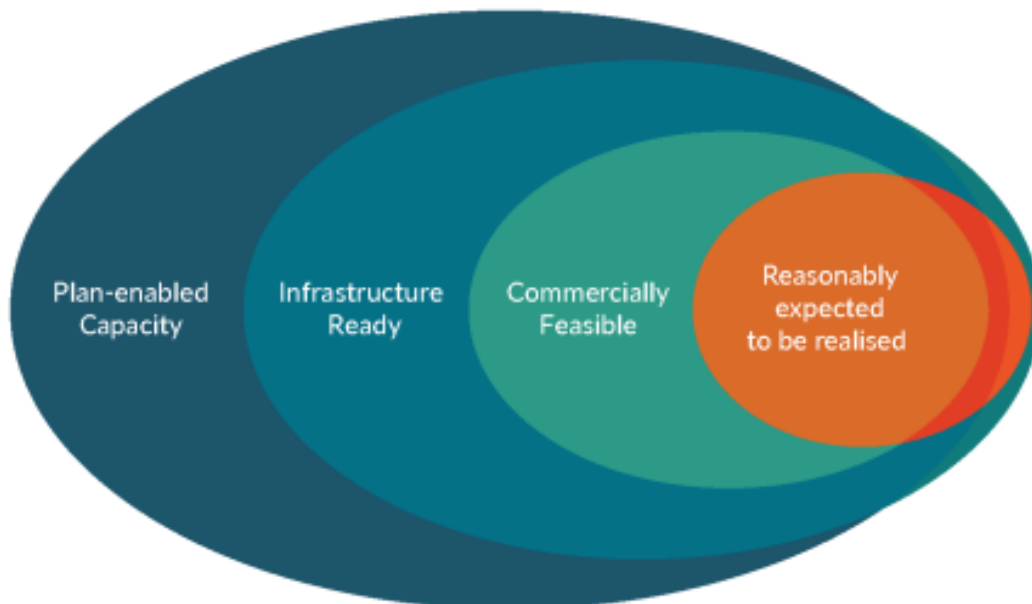
124. The Councils have been producing HBCAs since 2019. In accordance with the NPS-UD, the FDS was informed by the most recent applicable HBCA, which was published in February 2024. The Councils must publish a HBCA every three years in accordance the requirements of the NPS-UD. The Councils are also required to regularly monitor and update the HBCA data. This includes monitoring the data on a quarterly basis and publishing an annual report that details this data on the Councils websites.
125. Modelling informing the New Plymouth HBCA is undertaken in two distinct sets. One being an assessment of greenfield and undeveloped residential land, the other being an assessment of infill potential. The latter modelling is undertaken by Property Economics.
126. The notified version of the PDP was informed by the 2019 HBCA, which included both business and housing development capacity assessments as required by the NPS-UD. The PDP hearings process was informed by the 2021 HBCA (housing only update as required by the NPS-UD) and business update work undertaken by Property Economics. The decisions version on the PDP (i.e. all rezoning decisions) were informed by an additional update in 2022, outside of the HBCA, which updated development capacity for both business and housing figures to align with rezoning decisions of the PDP and to ensure we still had sufficient development capacity. This update indicated the PDP decision version would still have sufficient development capacity. The draft FDS has been informed by the 2024 HBCA which includes both business and housing development capacity.
127. The methodology for modelling development capacity is outlined in the following section.

#### 4.12 Modelling of Development Capacity

128. Submissions have been received from various parties (GJ Gardner #29, Warren and Claire Bolton #24, Westown Agriculture #23, Mike McKie #22, Landpro #19, Luke Conroy #32), which broadly question whether the FDS provides sufficient development capacity for residential land supply.
129. The provision of sufficient development capacity is a requirement of the NPS-UD. It relates to the capacity of land to be developed for housing or for business use; based on the zoning, objectives, policies, rules and overlays that apply in the relevant proposed and operative RMA planning documents. It also relates to the provision of adequate development infrastructure to support the development of land for housing or business use.
130. Various submission points consider that the HBCA does not adequately assess the sufficiency of housing development capacity, with respect to both the type and amount of capacity available. Submission points particularly refute what has been assessed as being 'plan-enabled', 'feasible' and 'reasonably expected to be realised'. This is outlined within the "peer review" of the HBCA undertaken by GJ Gardner (#29).

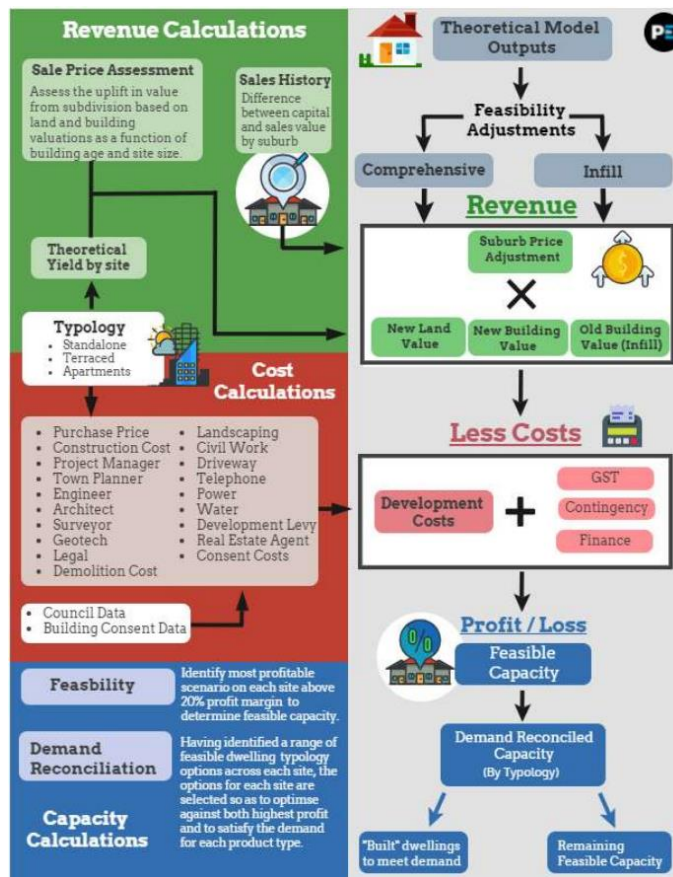
131. The methodology used to determine housing development capacity is assessed in accordance with the NPS-UD and in relation to greenfield assessments, broadly uses the following approach:
- a) First, the **plan-enabled capacity** is estimated to provide the upper limit on potential housing development that could be achieved. This calculation simply involves multiplying the total land area of each parcel by an estimated yield of dwellings per hectare. The estimated dwellings per hectare is adjusted based on land topography.
  - b) Next, it is determined whether the land is **infrastructure ready**.
  - c) Next, the **feasible capacity** undergoes adjustments to ensure its commercial viability to developers, considering the current cost-revenue dynamics. This adjustment aims to guarantee a developer's 20 percent profit margin, utilising the model provided by the Ministry for the Environment.
  - d) Subsequently, this capacity is further refined to reflect what is **reasonably expected to be realised capacity**, considering any constraints that may impede development progress. These constraints may include factors such as protected vegetation, wetlands, archaeological sites, access limitations, land typography, and past development trends.
132. The relationship between these steps is shown in Figure 1 below. As this shows, this assessment is a step-by-step process, with each step refining available capacity.

**Figure 1: Development Capacity Model (source: Ministry for the Environment)**



133. In relation to infill modelling undertaken by Property Economics to date, this follows the same broad steps specified within the NPS-UD. A summary of the feasibility model used by Property Economics, is shown in Figure 2.

Figure 2: Residential Feasibility Model Overview (source: Property Economics)



134. Inherently the modelling of capacity relies on assumptions, which have been set based on the best available data. It is important to acknowledge that no model can be perfect and that there will always be some under/over count. However, the greater the quality of inputs to the modelling, the more reliable the output.
135. We agree with submitters that the starting point for ensuring we have sufficient land available for development is a robust HBCA. The following sections will step through questions raised by submitters, outline work underway and a suggested approach moving forward to refine and improve this process.

#### 4.13 'Plan-Enabled Capacity'

136. Related to the accuracy of the HBCA, these same submissions have indicated that there is insufficient 'plan-enabled' capacity over the long term. A common submission point was that the data informing the HBCA has inappropriately considered what is deemed 'plan-enabled'.

137. As noted within the previous section, an assessment of what is considered 'plan-enabled' is the first limb of determining available development capacity within an urban environment. For land to be plan-enabled, the NPS-UD specifies that a district plan must provide for *housing use* as a permitted, controlled, or restricted discretionary activity on that *land*. Submitters have indicated that Council have incorrectly applied overlays in determining what is plan-enabled land.
138. As per the peer review undertaken by Mr Lawn for GJ Gardner, a large part of the concern is the impact that the presence of sites of significance to Māori (SASM), archaeological sites (AS) and Historic Heritage (HH), can have on the activity status when developing a site for residential purposes.
139. It is our view that the modelling presented by Mr Lawn in the submission of GJ Gardner has misapplied certain rules of the district plan relating to SASM and AS, including through the provision of buffer distances in excess of those required by the PDP. Other discrepancies include provision of a 50m buffer around scheduled pre-1900's buildings and the exclusion of full sites as being plan-enabled where earthworks on a portion of these sites are discretionary activities.
140. Meetings held have looked to come to agreement, where possible, as to what should be considered 'plan-enabled.'
141. The rules relating to SASM, AS and HH are complex and to assist, the following points broadly step through a simplified interpretation of the key rules and definitions that affect the activity status for housing use (and associated plan-enablement):
- a) Subdivision of a site containing any part of a scheduled SASM/AS is a discretionary activity.
  - b) Any building activity located within the extent of a scheduled SASM/AS is a discretionary activity.
  - c) Any earthworks located either within the extent of a scheduled SASM/AS, or within 50m of the verified extent of these sites, is a discretionary activity, depending on the zone in which the property is located.
  - d) Scheduled SASM/AS are defined terms and outline (amongst other things) that when in a residentially zoned area, a SASM/AS without a mapped extent shall have a default extent of 50m.
  - e) Any subdivision of a site containing a scheduled heritage building is a discretionary activity.
142. We agree with Mr Lawn 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", where the activity status is fully discretionary or non-complying. NPDC's modelling of capacity associated with structure plan development areas, undeveloped residential land and Future Urban Zones has typically removed SASM/AS and other overlay features from development capacity.
143. In relation to infill modelling undertaken by Property Economics, it is acknowledged that modelling previously undertaken did not exclude any portions of sites affected by SASM/AS/HH in determining infill capacity.

144. For sites containing SASM/AS, where these features cover only a portion of the site, the Councils have typically applied a differing interpretation of the NPS-UD requirements to that of Mr Lawn in relation to what is plan-enabled. We have previously based this on the *housing use* being permitted on *land* (not a *site*). Where portions of a site that contain SASMs, or other overlays, could be used for housing without triggering a discretionary activity rule, they were considered plan-enabled.
145. However, upon considering submissions on this point, Council officers acknowledge the practical reality of needing to undertake a subdivision as a part of a large-scale green-field development.

#### 4.14 'Feasible' and 'reasonably expected to be realised' capacity

146. Submitters have raised questions regarding whether, in producing the HBCA, the Councils have applied up to date information in determining if development is feasible. In particular, submitters have questioned whether the proposed updated development contributions (currently out for consultation) have been applied in the modelling.
147. Submissions received also questioned the feasibility of sites for development where these contain steep slopes, or Council infrastructure, restricting where buildings can be located.
148. We acknowledge that these updated development contributions have not been considered in the modelling, largely because these were still under development during preparation of the HBCA. Similarly, we agree that matters such as slope should be considered. It is noted that within greenfield modelling, the Councils do adjust anticipated yields, based on matters such as slope.
149. We also acknowledge that a range of global, national and regional economic factors influence the feasibility for developers to unlock capacity potential. These include construction costs, land and house prices, and interest rates, which fluctuate over time and impact on housing feasibility.
150. In relation to the capacity which could reasonably be expected to be realised, several submitters questioned Councils' approach to determining this. In particular, it was noted that the Councils did not take into account landowner intentions for larger greenfield sites.
151. There are different means to determine what is reasonably expected to be realised. Within the New Plymouth HBCA, in relation to assessments of greenfield land, reasonably expected to be realised capacity considers any constraints which may restrict development. For example, protected vegetation, wetlands, archaeological sites, access, and topography. This is done as a desktop exercise using GIS and does not include site visits to each land parcel. Where landowner's intentions are known by Council, these have been taken into consideration. Consideration is also given to previous consenting data in relation to what is achievable and has previously occurred.
152. The submission of Mr Broomhall and Palmbrook Developments Limited (#31) notes the expert reporting that private developers often undertake for projects and previous planning processes, that could be taken into account and fill gaps where Council has not yet had the capacity to research features or issues.

153. These submissions are acknowledged and highlight opportunities for Council's and developers to work together collaboratively.

#### 4.15 Next steps for modelling

154. Taking into account the above matters, based on submissions received, NPDC can see improvements can be made to the modelling that has been undertaken to inform the HBCA. Property Economics are currently re-running infill capacity models with updated inputs.
155. As noted earlier within this report, a meeting has been held with representatives of GJ Gardener Homes to come to agreement regarding what is "plan-enabled" and what should be taken into account in determining what is "Feasible" in the context of the PDP.
156. At the time of writing this report, the key principles and assumptions guiding what will be counted as "plan-enabled" and "feasible" through this modelling are still being worked on, but are likely to include matters such as:
- a) Remove any land restricted by an overlay which would make housing use a discretionary activity (SASM/AS).
  - b) Remove any land with a slope of 18 degree or greater.
  - c) Remove land where any building platform would necessarily cross Council infrastructure.
  - d) Include updated inputs relating development contributions, building costs and other associated costs.
157. Confirmation of areas of agreement and disagreement, will be reported back to the Subcommittee at the hearing.
158. We anticipate we will be able to provide the Subcommittee with updated modelling following the close of the hearing, but before final decisions are made.
159. It is noted that this work is an area of continuous improvement and refinement, and the Councils are committed to this. Submissions on the FDS have articulated clear improvements that the Councils can make to improve the quality of its monitoring of the supply of residential land and in turn, allow us to respond accordingly.
160. The requirements of the NPS-UD are such that Councils planning must be responsive. Should a shortfall in development capacity be identified, the Councils must respond accordingly, through associated changes to planning documents including any FDS (NPS-UD 3.7(1)).
161. As such, regardless of the timing of any required development or review of an FDS, if a shortfall is identified, adjustments must be made.
162. As noted earlier within this report, submitters representing the development sector seek to enhance collaboration with the partnership on the next assessment of development capacity which we consider appropriate and provided for by the NPS-UD.

**Recommendation**

- That a new section is added to the FDS 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.

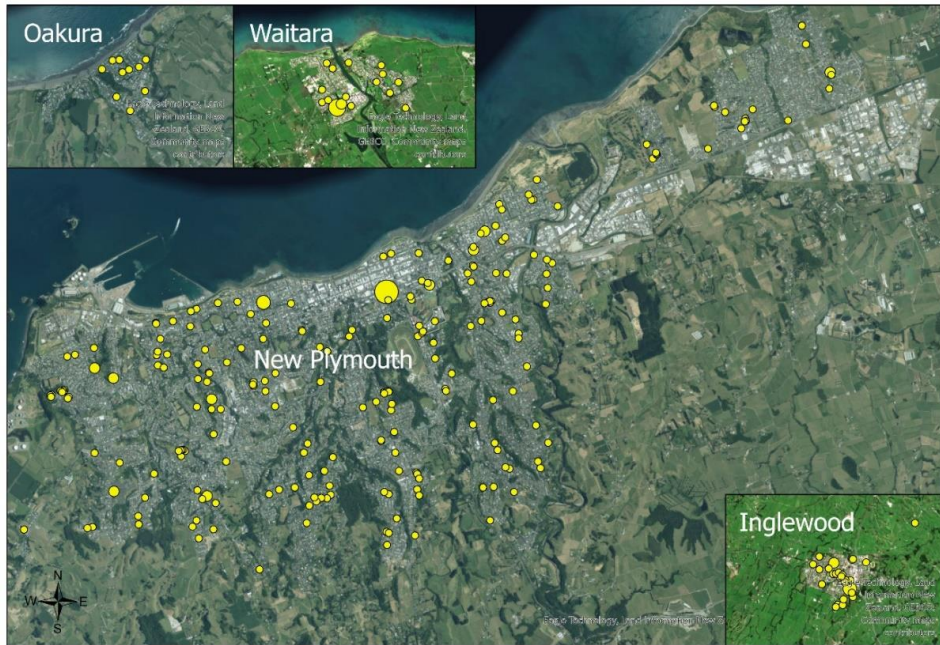
#### 4.16 Residential capacity

163. The majority of submitters who have questioned the capacity figures underpinning the HBCA and FDS have indicated that to respond to the issues raised, Future Urban Zones should be brought forward and that significant amounts of additional greenfield land should be rezoned to provide additional residential capacity immediately.
164. While the individual sites put forward by these and other submitters will be assessed and discussed in further detail later in this report, it is useful to initially consider the broader concepts of the most appropriate response, should additional land be required.
165. The converse of these requests to allocate more land to greenfield expansion, are the submissions of NZTA and Kāinga Ora who have requested that greater investigation is made into additional intensification options, or that greater work is done to encourage and allow intensification, such as through structure planning of areas identified for intensification.
166. While it is noted that officers are still waiting for updated modelling figures to be provided, the submission of GJ Gardner and supporting submissions have indicated that the shortfall in capacity associated with their submission is within the long-term. Officers' view is that there is sufficient land supply in the short-medium term with a comfortable margin.
167. The timing of the need for land suitable for development should be a critical aspect to any response to these submissions. It has not been 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.
168. The balanced approach to growth proposed through the draft FDS seeks to logically sequence the release of greenfield residential land, in large part, due to the high costs associated with providing infrastructure to service these areas. It is not considered a sustainable option to provide a significant over-abundance of greenfield land, particularly where more cost-effective options may be available.
169. A sequenced approach to growth also allows appropriate lead-in times to ensure that these areas develop as well-functioning urban environments. Aspects such as structure planning and engineering design require time and resource and the Councils cannot commit to doing these for all areas at once.
170. We do acknowledge that the Councils need to be responsive. Ongoing monitoring, and a willingness to pivot when required, is essential. The Councils should also be willing to be responsive where outside investment is proposed. These points will be discussed further within section 4.17 of this report, where specific adjustments to timing of projects relating to future urban growth have been recommended.

171. As noted earlier within this report, the NPS-UD requires councils to provide for well-functioning urban environments. While a vital component, it is important to note that capacity is one aspect of a well-functioning urban environment. The make-up and location of the areas in which we are providing for growth are also essential. Consideration needs to be given to accessibility to and between housing, jobs and services as well as to how growth patterns can support reductions in greenhouse gas emissions. Rezoning of FUZ/greenfield land should not be at the expense of achieving a compact urban form throughout the district. The NPS-UD provides strong direction to encourage compact urban environments.
172. There are significant benefits of providing development through infill of existing urban areas. In particular, it is noted that three waters modelling recently undertaken by NPDC generally shows a high amount of capacity in these networks. A compact city also provides benefits for residents in terms of reducing car dependency and traffic through an increased ability to use active modes and public transport, which also helps reduce carbon emissions.
173. Submissions have indicated that the reliance placed on infill developments is unrealistic, as the feasibility of these developments will often prevent them from occurring. Submitters have indicated that a lot of the areas currently identified for Medium Density are not appropriate for medium density developments. Landpro (#19) for example highlighted that several schools within the district are zoned for medium density and will of course not be developed.
174. It is important to note that, just because a site is zoned for a particular purpose, that does not mean that these sites are being counted as a part of our development capacity (for example the schools outlined). It is also useful to note that over the last three years, there has been a consistent approval for building consents for infill developments at approximately 30% each year as illustrated in Figure 3. This aligns with the volume of residential development allocated to infill within the HBCA.



**Figure 3: Residential Building Infill Consents in New Plymouth District 2021 - 2023**



175. Further rezoning of greenfield land will result in a 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.<sup>2</sup>
176. The requirements of the NPS-HPL are also a key considerations in terms of considering future growth options. Several greenfield sites suggested by landowners contain highly productive land. The FDS is required to give effect to the requirements of the NPS-HPL. This contains clear direction that urban rezoning of highly productive land can only occur where:
  - a) Urban rezoning is required to provide sufficient development capacity to meet demand; and
  - b) There are no other reasonably practicable alternatives to provide capacity; and
  - c) The environmental, social and cultural benefits outweigh the costs.
177. The NPS-HPL indicates that to meet these requirements, Councils must first consider other options including intensification of existing urban areas, rezoning land that is not highly productive, or rezoning land with a relatively lower productive capacity.

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<sup>2</sup> See paras 10.6-10.10 Property Economics, Hearing 22 s42A Report Rezoning Overview Report Appendix 5 Tim Heath Statement of Evidence.

178. Given the above, officers are of the view that various options should be considered in relation to how we respond to growth pressures and provide sufficient residential development capacity. In the first instance, it is considered most appropriate to investigate options to provide additional nuance to provisions of the proposed district plan. This would enable those portions of existing identified structure plan development areas, undeveloped residential land and infill, currently restricted by overlays, to be considered 'plan-enabled' and developed in appropriate ways. This option, will of course require significant engagement to understand the impact of such changes.
179. In section 4.17 officers consider the merits of specific submissions requesting the prioritisation and addition of new sites to existing FUZ and Structure Plan Development Areas, and the identification of new greenfield land.

#### **Recommendation**

Overall, officers' recommendation is to retain Option 3 (Balanced Focus).

In addition, officers recommend that, in line with other recommendations in this report:

- 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 options for additional FUZ/Greenfield sites.
- Investigate additional opportunities for residential intensification.

### 4.17 Housing Choice

180. Several submissions have general questions as to whether the FDS provides for housing choice.

#### Appropriateness of Provision for Retirement Living

181. Submissions made (McKie #22 and Summerset Group #11) queried whether the HBCA and FDS had considered the need for land suitable for retirement housing. These submissions noted our aging population and indicated that in general, modern retirement housing developments require lot sizes of 8-10ha. The submissions queried whether specific assessment had been made of sites suitable for this type of development.
182. While no specific assessment has been made for this type of development, in the officers' view, retirement housing is still considered residential. As such, it is generally anticipated in our residential zones, including structure plan development areas, that will be suitable for retirement living.
183. While no detailed assessment has been made of suitable areas of land for this typology of housing, there are large lots available within the structure plan development areas and undeveloped residential land.

#### Apartments in the CBD

184. Several submissions have questioned the feasibility of apartments in the CBD and have indicated that we should not be providing for these as an option.

185. It is important to note that the planning rules which enable this type of development are necessary and do provide a housing choice. Apartment living often provides a more affordable housing option, where residents can take advantage of the efficiencies of living in the CBD including being close to employment and business services and public transport. Apartment living in the CBD also benefits from the sunken costs of infrastructure, as the largest pipe sizes are generally located at the bottom of the catchment.
186. We have heard anecdotally from real estate agents that there is a higher demand for apartments than the current supply. It is important that the FDS and associated planning documents enable and encourage this type of development.

#### Investigation of Higher Density Zonings within Greenfield Areas

187. Typically areas rezoned for greenfield development in the district have been zoned General Residential. Little consideration has historically been given to the appropriateness of different densities, including high density and medium density.
188. We support the Kāinga Ora suggestion to consider higher densities within development areas, particularly around new local centres, and that this be investigated during finer-grained structure planning. The provision for this would provide increased development choices for the community and increased housing capacity. We do not think any specific amendments to the FDS are required to address this. Structure planning is considered within the Implementation Plan and consideration of these matters will be given then.

#### Responding to Homelessness

189. We acknowledge the submissions from Ben Ingram for the Taranaki Housing Initiative Trust (#27) and Health New Zealand -Te Whatu Ora (#18) which raise the issue of homelessness and acute housing need. The Draft FDS supports a wide range of housing options and recognises the need for urban development to reflect changing population demographics and housing needs. Council considers that 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.

#### **Recommendation**

- No specific additional recommendations as a result of submissions under this theme because the PDP enables these housing choices and the FDS supports them.

#### 4.17.1 Business capacity

190. This section addresses matters raised regarding capacity in respect to business land, which includes industrial land and commercial land.
191. Within the PDP, industrial land is land zoned as General Industrial Zone and commercial land is land zoned as one or other of the zones falling under the Commercial and Mixed Use Zones umbrella: City Centre Zone, Town Centre Zone, Local Centre Zone, Mixed Use Zone, Large Format Retail Zone and Commercial Zone.

### Industrial Land

192. Chris Herd (#14) provided comments in respect to the provision of industrial land. The submitter and his business partners own approximately 70% of the Oropuriri FUZ area adjacent to Egmont Road. Reference is made by the submitter at point 24 to a June 2021 report undertaken by Property Economics that indicates that the district has sufficient industrial zoned capacity to accommodate future industrial land demand over the long-term. The submitter disagrees with this and considers that the total supply of industrial land has been oversimplified and that the supply of zoned and vacant industrial land has decreased since the report was written. The submitter suggests that a review of the integrity and validity of this reporting is required to better address assumptions and understand industrial land supply. It is noted that these comments from the submitter are closely aligned with the request to rezone the eastern side of the Oropuriri FUZ area from Future Urban Zone to General Industrial Zone, i.e. to bring forward the rezoning into the medium term/start of long term (next 10-15 years). This is outlined in section 4.17.1.
193. Council is undertaking a Waitara Spatial Plan and the draft LTP is identifying a spatial plan for Bell Block. This work will help to inform new opportunities for these areas ready to be integrated into the next FDS review. Other towns such as Inglewood may follow in the future. It is noted in section 4.17.2 that a recommendation has been made to carry out spatial planning in Inglewood, commencing in 2026. It is considered appropriate that industrial zoning within Waitara, Bell Block and Inglewood be investigated as part of these spatial planning processes. This will need to be considered within the wider context of the district wide industrial zoning provision, which will be informed by monitoring such as industrial land economic assessments, quarterly monitoring reports and three yearly HBCA reporting.

#### **Recommendation**

- 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.

### Commercial Land

194. R & R Kalin Partnership (#5) seeks that Centre City and the foreshore be developed alongside the parking issue (the condemned Council parking building). They consider that the foreshore should be utilised to develop retail business to attract locals and visitors to the CBD. They also state that the focus should be returned to the CBD as many building owners (as well as business owners) have seen a decline in local interest and sales within the CBD (more closed shops and empty buildings on the mainstreet).
195. Centre City Shopping Centre is a shopping mall that is privately owned. Therefore, Council is limited in what it can do to facilitate its further development.
196. The Downtown Car Park is a seven-storey car park, which fronts onto Powderham Street, built in the late 1980s in line with the standards and building codes of the time. Council closed the 268-space car park in December 2020 after it was found to be earthquake prone. In 2023, the Mayor and Councillors approved \$4.4 million to earthquake-strengthen the building so it could be safely reopened for public use. Work began on site in March 2024 and the building is expected to reopen by Christmas 2024.

197. Tasman Prospect Park is a piece of land located on the seaward side of St Aubyn Street next to the Coastal Walkway. The land is owned by Ngāti Te Whiti Whenua Topu Trust and a portion is leased to Council. This lease was renewed on 1 March 2021 and the term is for ten years. There is one right of renewal of ten years (renewal date 31 March 2031) and the final expiry date is 28 February 2041. The site is within the City Centre Zone and the height limit is 10m. The address is 70 St Aubyn Street, New Plymouth and is shown in Figure 4 below.

**Figure 4: Map Showing Location of 70 St Aubyn Street, New Plymouth**



198. There is already provision for development within the lease, which is described as follows: “Public recreation and community use of open space for the benefit of people in New Zealand, car parking (in the car parking are on the premises) and such other use (including commercial use and the development of an urban marae), as may be agreed between the parties from time to time.”
199. The decisions version of the PDP includes these features that are intended to assist promoting development in the city centre:
- Introduction of six Commercial and Mixed-Use Zones accommodating a range of activities and commercial environments: City Centre Zone, Town Centre Zone, Local Centre Zone, Mixed Use Zone, Large Format Retail Zone and Commercial Zone;
  - A hierarchy of centres, which clearly articulates the role and function of existing centres within the District and the activities expected within them;
  - Consolidating commercial zoning in the District, particularly in the city centre and Waitara;
  - Amending defined pedestrian frontage requirements and locations to ensure high quality buildings that positively contribute to the streetscape; and
  - Placing a focus on the city centre and the Huatoki Stream within it through mechanisms such as height management areas (six options: 10m, 14m, 17m, 19m, 25m and 30m), coastal frontage sites, and a heritage character area which includes contributory buildings.

200. The [Ngāmotu New Plymouth City Centre Strategy](#) was approved by Council in December 2021. It acknowledges that the city centre is facing challenges in the way that people shop, do business and spend their leisure time. A vision has been set which is supported by five goals that seek to address the identified challenges and opportunities, five principles that are crucial to the future success of the city centre and will underpin how we do things, and five key moves (bold actions) that will set a strong pathway forward and bring about lasting change.
201. Given that Centre City is privately owned, that action is already occurring on the Downtown Car Park, that there is already provision within the lease for Tasman Prospect Park for certain types of development to occur and that provisions and actions in the PDP and the Ngāmotu New Plymouth City Centre Strategy already facilitate vitality and vibrancy, no change is recommended to the FDS or the FDS Implementation Plan.

**Recommendation**

- No change.

202. CGR Developments Ltd (#9) refers to economic evidence provided by Adam Thompson from Urban Economics Ltd on behalf of Bluehaven Commercial Ltd (“Bluehaven”) given as part of the PDP hearings. They state that this confirmed there are no commercially feasible sites for Large Format Retail (“LFR”) in the New Plymouth CBD as they are either too small or have existing buildings that are not economic to remove, and that the main implication is LFR brands will not have access to suitable land and will therefore not establish.
203. Based on a Property Guru mapping exercise, CGR Developments Ltd advises that tenants will not locate in New Plymouth, unless one of three things happens:
- a) A vacancy in the Valley Shopping Centre (within the PDP-AV, Large Format Retail Zone);
  - b) There is a concerted effort by a party(s) to amalgamate multiple titles in the City Centre Zone together and then do a design build (this will likely have feasibility issues); or
  - c) NPDC is able to provide more ‘plan-enabled’ land suitable for LFR retailers to establish and operate.
204. In addition to the Large Format Retail Zone, LFR can occur as a permitted activity within the PDP in the City Centre Zone and Town Centre Zone. It is also a discretionary activity in the Local Centre Zone where the scale, design and layout is compatible with the character and amenity of the local centre. It is noted that in the City Centre Zone and Town Centre Zone it is a permitted activity to demolish or remove a structure and a restricted discretionary activity to erect, alter or add on to a building. These three restricted discretionary activities have non-notification clauses whereby an application is precluded from public notification and limited notification, meaning a relatively straightforward consenting pathway compared to other zones where LFR is non-complying.
205. If developers cannot find suitable sites, it is preferred that they consider (2) above in order to meet the strategic objectives of the PDP (e.g. UFD-21, UFD-22 and UFD-23 regarding vibrant and viable centres) and the goals of the [Ngāmotu New Plymouth City Centre Strategy](#) (e.g. Goal 2: A re-energised economy). However, the concerns raised by CGR Developments Ltd around the provision of available plan-enabled business land for LFR are noted.

206. The nature of LFR has changed in recent years. Traditionally, LFR stores sold bulky items such as whiteware, sporting and outdoor equipment. Nowadays, it is common for LFR stores to sell smaller items such as footwear and pharmaceutical goods. This offer is already available in many of New Plymouth District's existing centres. If this offer is replicated in new LFR zones it could be detrimental to the vibrancy and vitality of the existing centres, particularly the city centre.
207. Given the changing nature of LFR, it is important to note that the scale of any zoning would be a consideration if additional areas of LFR zoning were added in the PDP. In addition, it is likely that provisions would be put in place covering matters such as the type and size of stores so as not to compromise the vibrancy and vitality of the existing centres. This will need to be considered within the wider context of the district wide commercial zoning provision, which will be informed by monitoring such as retail and commercial land assessments, quarterly monitoring reports and three yearly HBCA reporting.

**Recommendation**

- 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.

208. Landpro Limited commented that it appears that there is a good supply of land zoned for business purposes but that there is no detailed analysis to suggest that the zoned land is usable for the most likely businesses that may go there. Inglewood is highlighted as a good example of this because there is land zoned for business and commercial, but parties who want to develop for this purpose can find nowhere to do it.
209. Landpro Limited also considers that some business zoning does not correspond to logical points where business may want to establish in the future, e.g. the upgraded road network in Waitara/Bell Block.
210. The submitter suggests that further analysis of the business zoning and its capacity/yield be undertaken and any shortfall be addressed through rezoning in the PDP. They also suggest that a strategic focus is created for business zoning in specific areas, via 'business parks' or similar, and to provide for these in the PDP if appropriate.
211. As mentioned above, it is considered appropriate that industrial zoning within Waitara, Bell Block and Inglewood be investigated as part of the spatial planning processes for these communities. It therefore follows that business zoning should be investigated as well. This will need to be considered within the wider context of the district wide commercial zoning provision, which will be informed by monitoring such as retail and commercial land assessments, quarterly monitoring reports and three yearly HBCA reporting.

**Recommendation**

- Investigate the provision and type of commercially-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.

### Industrial and Commercial Land

212. NZTA (#12) suggested that further consideration be given to the medium and long-term approach to business land in relation to new housing areas and the associated impact and opportunities for the land transport system.
213. As mentioned above, it is considered appropriate that industrial and commercial zoning within Waitara, Bell Block and Inglewood be investigated as part of the spatial planning processes for these communities. Again, these will need to be considered within the wider context of the district wide zoning provision, which will be informed by various types of monitoring. These spatial planning processes are considered suitable to address the concerns raised by NZTA.

#### **Recommendation**

- 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 for these communities and consider updating the FDS Implementation Plan and PDP via a plan change to accommodate any shortfall and change in provisions.

## 4.18 Rezoning requests

### 4.18.1 Requests relating to FUZ and Structure Plan Development Areas

214. Submissions were received from Craig Broomhall and Palmbrook Developments Ltd (#31), Nick Field (#2), Johnson Family (#20), Hywel Edwards (#35), Westown Agriculture/ Thomas Family (#23), CGR Development Ltd (#9), GJ Gardner (#29), Taranaki Housing Initiative Trust (#27), Kainga Ora (#21), Mike McKie (#22), NZTA/Waka Kotahi (#12), Fonterra (#25), Chris Herd (#14) and GJ Pike and Astron Dales Estate Limited (#26) relating to Future Urban Zones and the Puketapu Structure Plan Development Areas requesting the following:
- a) Officers reconsider the priority order of the release of the FUZ land;
  - b) Add new pieces of land to current FUZ land; and
  - c) Add new pieces of land to Puketapu Structure Plan Development Area.

#### Priority order of FUZ

215. The priority order of the release of the FUZ land is set out in Table 14: Draft Implementation Plan of the Draft FDS. The current order is based on when the land is required for housing or business development capacity and alignment with the provision of the required infrastructure. However, officers acknowledge that the priority order of the release of the FUZ land within the 10–30-year period is open to review.



216. Officers support submissions from CGR Developments Limited (#9), Craig Broomhall (#31) and GJ Pike and Astron Dales Estate Limited (#26) and recommend bringing forward the scoping of the feasibility/planning for the Smart Road FUZ to the 2024/2025 financial year. This scoping exercise would involve summarising all information on current constraints and opportunities for this area and exploring any ability to stage development in consultation with Councils, landowners, developers, NZTA and Iwi and hapū. This work will then inform the next LTP budget and the outcome of the study would be included in the next FDS.
217. Officers note that the timing of the rezoning of the Oropuriri FUZ was not discussed in the Draft FDS implementation plan. To address the submissions received from CGR Developments Ltd (#9), Chris Herd (#14) and Fonterra (#25) on this FUZ, including whether the area should be zoned for industrial or residential use, officers recommend that a feasibility study be undertaken in 2026/2027 in conjunction with NZTA, landowners and developers to review the most appropriate zoning for the Oropuriri FUZ. The focus of this study would be to explore issues of reverse sensitivity, impacts on industrial land supply and traffic impacts on the SH3 if the future zoning of the land was to change from industrial to residential.
218. There remain significant infrastructure issues to address in relation to the submission received from Mr McKie (#22), proposing that the Ōākura FUZ should be rezoned to General Residential, to allow for the establishment of a retirement village with approximately 250 to 300 units.
219. Officers support an option to bring forward the Ōākura FUZ feasibility study to 2027/28 to explore this request. The outcome of this feasibility study would then feed into the next FDS.
220. A submission was received from the Westown Agriculture/Thomas Family (#22) to bring forward the rezoning of the Frankley/Cowling FUZ into the medium term.
221. Officers support an option to bring forward the Frankley/Cowling feasibility study to the 2024/25 financial year to explore this request. The outcome of this feasibility study would then feed into the next FDS.

#### Adding New Pieces of Land to FUZ Land

222. Two submissions were received which requested the expansion of the Frankley/Cowling FUZ to include 213 Cowling Road and the portion of 187 Cowling Road (the Westown Agriculture site,) (Westown Agriculture/Thomas Family #22 and Hywel Edwards #35). Currently these properties contain areas of highly productive land. As outlined in the Draft FDS, the 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, or can meet the matters set out in Clause 3.10 of the NPS-HPL.
223. Officers consider that there is merit in including these two properties in the Frankley/Cowling FUZ and recommend that this matter will be included in the feasibility study for this FUZ. Officers also note that the landowner at 187 Cowling Road will contribute to the cost of this work. The outcome of this feasibility study will be included in the next FDS.

Adding New Pieces of Land to Puketapu Structure Plan Development Area

224. Two submissions were received to add land to the Puketapu Structure Plan Development Area:
- a) 115 Airport Drive (Johnson Family #20) (shown in yellow in Figure 5 below); and
  - b) 22 Airport Drive (Kiwi Trust #16)

**Figure 5: Map Showing Portion of Johnson's Property (in yellow) requested to be added to Puketapu Structure Plan Development Area**



225. In addition, the Johnson Family request that their land located outside the highlighted yellow area shown on Figure 5 at 115 Airport Drive be rezoned to FUZ. Due to the potential reverse sensitivity issues with the Airport, officers do not support this request.
226. However, officers do 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. Officers note that the impact on the New Plymouth Airport will need to be considered and consultation with Puketapu hapu will need to occur as part of this process.
227. The land at 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 Future Urban Zone 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.

**Recommendation**

- That scoping of the feasibility/planning for the Smart Road FUZ to 2024/2025 financial year is brought forward.

- That a feasibility study is undertaken in the 2026/2027 financial year in conjunction with NZTA, landowners and developers to review the most appropriate zoning for the Oropuriri FUZ.
- The feasibility study for the Frankley/Cowling FUZ is brought forward to commence in July 2024, noting that the landowner at 187 Cowling Road will contribute to the cost of this work. This feasibility study should also investigate the inclusion of 213 Cowling Road and the portion of 187 Cowling Road covered by Westown Agriculture site.
- Note that the rezoning of land at 22 Airport Drive is subject to an active Environment Court mediation process.
- Further investigations are undertaken 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.

#### 4.18.2 Requests to rezone rural production land

228. Submissions were received requesting the rezoning of rural land that is not contained within a Structure Plan Development Area identified in the PDP.

##### Inglewood

229. Two submissions (Kalin # 5 and Landpro # 19) were received in relation to the need to provide for more greenfield land in Inglewood to provide for urban growth in the next 10 to 15 years. The sites put forward by Landpro (#19) were assessed as part of the Draft FDS but were considered unfavourable in the short term due to significant issues with wastewater and stormwater infrastructure and being partly located on highly productive land.
230. Officers acknowledge that there is a need to address urban growth more comprehensively in Inglewood, and to explore the possible removal of heavy traffic from the township. Officers consider that urban growth is more appropriately addressed as part of a spatial planning exercise which would involve developers, landowners, Iwi and hapū and the wider community.

##### **Recommendation**

- Amend FDS and Draft Implementation Plan to state that the development of a spatial plan for Inglewood will commence in 2026. The outcomes of the Inglewood spatial plan will inform the next FDS.

##### Waitara

231. Two submissions (Landpro #19 and Kalin #5) were received in relation to the need to provide for more greenfield land in Waitara to provide for urban growth in the next 10 to 15 years. The areas proposed by Landpro were assessed as part of the Draft FDS but were considered unfavourable as they were located on highly productive land, and the township currently has significant problems with wastewater and stormwater which needs to be resolved before further growth can occur. The advantages of the areas suggested by Landpro is that they are located outside of the known existing hazard areas.

232. Officers note that NPDC is currently developing a spatial plan for 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. Otaraua hapū (#34) are supportive of the preparation of a spatial plan for Waitara which would identify where future urban development will occur.

**Recommendation**

- Amend FDS and Draft Implementation Plan to include a section on the Waitara Spatial Plan. The outcomes of the Waitara spatial plan will feed into the next FDS.

Proposals to Rezone to Rural Lifestyle Zone

233. The PDP contains a Rural Lifestyle Zone (“RLZ”), which is generally located on the fringe of urban settlements and is peri-urban in nature. Some parts of the zone reflect historical [subdivision](#) patterns, while other parts have been identified as suitable to transition to [rural lifestyle living](#). The role of RLZ is to provide areas for [rural lifestyle living](#), whilst ensuring the Rural Production Zone (“RPROZ”) is able to continue to function as a productive working zone that is not compromised by ad-hoc or sporadic [subdivision](#) and/or [rural lifestyle living](#) activities.
234. The RLZ provides another housing choice across the district to meet the needs of the population in terms of location and price, rather than addressing a housing demand issue. Under the NPS-UD, additional housing in the RLZ cannot be counted as feasible nor realisable development capacity, because it is not infrastructure ready.
235. In addition, the NPS-HPL provides a more stringent ‘avoid’ approach for rural lifestyle zoning on HPL given this is an inefficient (and generally inappropriate) use of this finite resource.

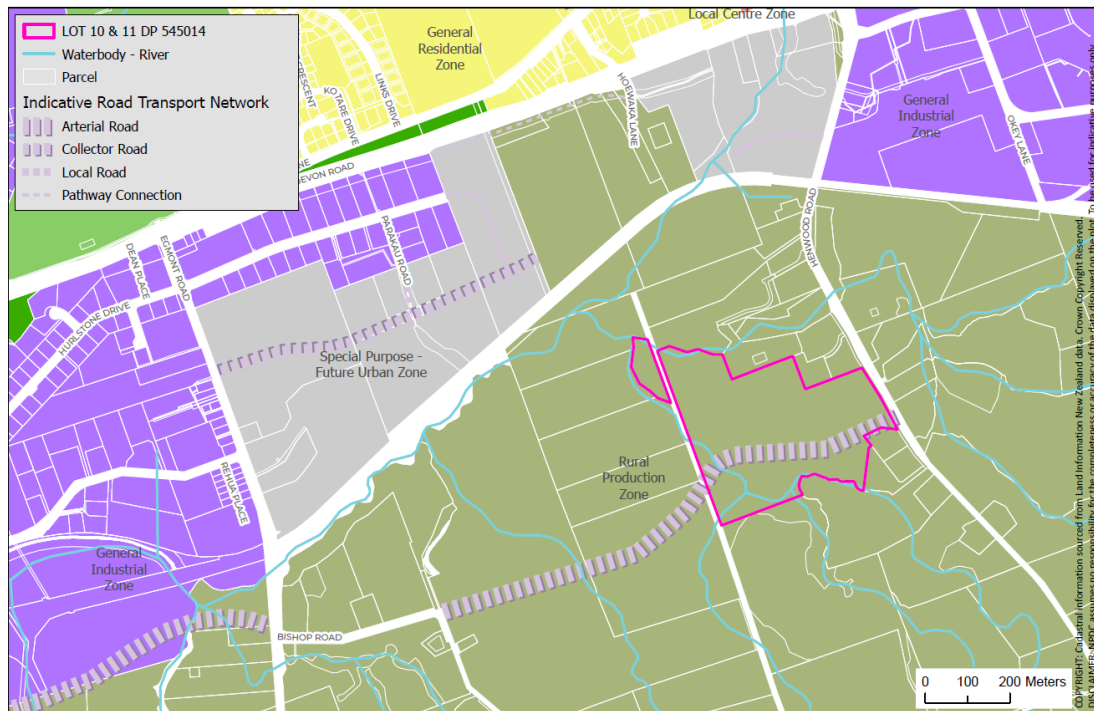
The NPS-HPL Clause 3.7(1) states:

*“Territorial authorities must avoid rezoning of highly productive land as rural lifestyle, except as provided in clause 3.10.”*

Rezone land at 108 Henwood Road, New Plymouth from RPROZ to RLZ

236. A submission was received from Rachel Cottam (#17) that requested the rezoning of 108 Henwood Road, New Plymouth from RPROZ to RLZ. The site contains a mixture of LUC Class 2 and LUC Class 5 land. As shown in Figure 6 below the property is also dissected by an indicative road. Officers note that the taking of the road is crucial to honouring a commitment to NZTA to construct a parallel road to State Highway 3, between Smart Road and Henwood Road.
237. Council officers also consider that the presence of the road which would be taken upon the subdivision to create the proposed lifestyle living lots meets the exemptions outlined in Clause 3.10 of the NPS-HPL. In particular, the potential social and economic benefits of the taking of the road via the subdivision process outweighs the costs of the loss of highly productive land. The benefit of the RLZ zoning is that three waters services are not required.
238. However, spot rezoning can be inefficient. Officers are currently undertaking a spatial plan for Bell Block and it is more efficient that this proposal should be considered as part of that process.

**Figure 6: Map Showing Location of 108 Henwood Road, New Plymouth**



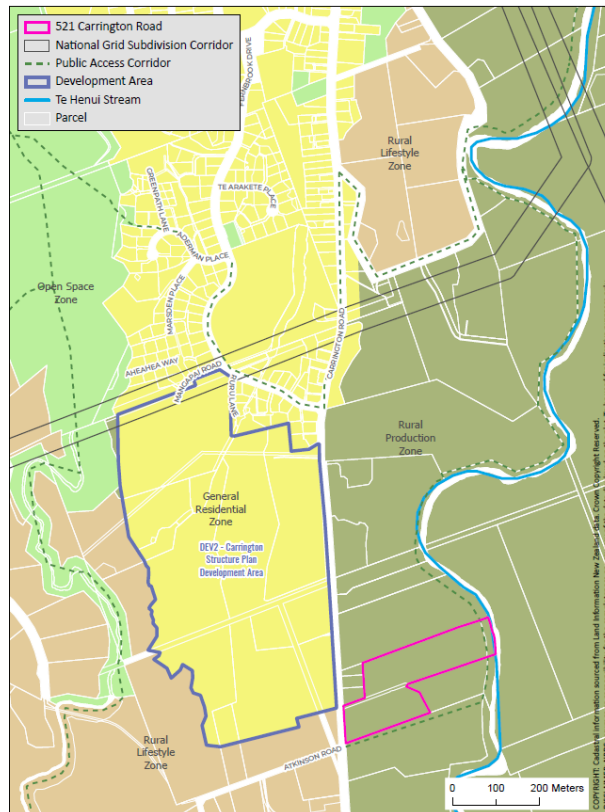
**Recommendation**

- Amend the FDS and the Draft Implementation Plan to state that any rezoning of 108 Henwood Road will be considered as part of the Bell Block spatial plan which starts in July 2024. The outcomes of the spatial plan will feed into the next FDS.

**Rezoning land at 521 Carrington Road, New Plymouth from RPROZ to RLZ**

239. A submission was received from Luke Conroy (#32) to rezone a property at 521 Carrington Road, New Plymouth and the surrounding properties on the eastern side of Carrington Road from RPROZ to RLZ. The flat area of land is located adjacent to the road is LUC Class 2, with the steeper land towards the river is LUC Class 6.
240. As shown in the map of the area (see Figure 7 below) officers consider there is an opportunity to provide a more logical zoning pattern by extending the RLZ zoning from Saxton Road to 521 Carrington Road, using the Te Henui Stream as the boundary, as the portion of LUC Class 2 land is highly fragmented and could meet the exemptions outlined in Clause 3.10 of the NPS-HPL.
241. As part of the FDS Councils assessed this area as “Greenfield Focus – Carrington South” for rezoning to general residential zone. (Refer to Map on page 22 Technical Document Appendix 1 – Greenfield Focus – Carrington South). The area was considered favourable for further investigation as it is largely free from constraints, apart from the presence of the National Grid, and the slope of the land as it falls into the river valley.

**Figure 7: Map Showing Location of 521 Carrington Road, New Plymouth**



**Recommendation**

- Amend the recommendation in the draft FDS to investigate the rezoning of land, shown as Carrington South, to either RLZ or GRZ in 2028/2029 financial year and the outcomes of this investigation to be included in the next FDS.

## Appendix 1: Summary Table of Recommendations

<b>Officers recommended amendments to FDS</b>
<b>Section 1: Introduction</b>
Move the outcome statements to the Introduction section.
<b>Section 2: Growth Planning in New Plymouth</b>
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.
<b>Section 3.3: Planning for and Provision of Infrastructure</b>
Amend the first paragraph to include reference to waste management infrastructure and services.
Amend to insert wording agreed between Powerco, Transpower and the Councils.
<b>Section 4.2: Pre-draft Consultation</b>
Amend to reflect the Ministry of Education’s focus on supporting iwi/hapū/whānau educational aspirations, providing this is accepted by iwi and hapū.
<b>Section 4.3: Outcomes for the FDS</b>
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>
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>
Amend the outcome statement on Choice as follows: 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.
Amend the outcome statement on Tangata Whenua as follows: <u>Partnership with</u> Tangata Whenua <u>Partnership between Councils and tangata whenua provides for urban development and growth, and protection and preservation of form 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 within their rohe.</u>
Reorder the outcome statements into alphabetical order.
Move the outcome statements to the Introduction section.
<b>Section 4.5: Spatial Scenarios</b>
Retain Scenario 3 – Balanced Focus.
<b>Section 6: Implementation</b>

<b>Officers recommended amendments to FDS</b>
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.
<b>New Sections</b>
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.

<b>Recommended amendments to FDS Technical Document</b>
<b>Section 5.3: Infrastructure Planning</b>
Amend to insert wording agreed between Powerco, Transpower and the Councils.
<b>Appendix 2: Maps Showing District Wide Constraints</b>
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.

<b>Recommended amendments to Implementation Plan*</b>
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"> <li>• Continue regular meetings between Councils and the Ngā Kaitiaki Roopū.</li> <li>• Continue meeting regularly with the Technical Professional Group and Developers Forum.</li> <li>• Establishment and ongoing maintenance of a Planning Advisory Group.</li> <li>• Development of a PDP Implementation Plan to proactively assist change management and to achieve the outcome sought by the PDP.</li> </ul>
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.



<b>Recommended amendments to Implementation Plan*</b>
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.
Revise feasibility study and plan change timelines for Puketapu Structure Plan Development Area: <ul style="list-style-type: none"> <li>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.</li> </ul>
Revise feasibility study and plan change timelines for FUZ: <ul style="list-style-type: none"> <li>Bring forward the scoping of the feasibility/planning for the Smart Road FUZ to 2024/2025 financial year.</li> <li>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.</li> <li>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.</li> </ul>
Investigate the rezoning of land, shown as Carrington South, to either RLZ or GRZ in 2028/2029 financial year.
Consider the rezoning of 108 Henwood Road, New Plymouth as part of the Bell Block spatial plan.
Work with tangata whenua to explore opportunities to develop guidance notes and other documents that provide support and clarity on process and scope issues.

\*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 2: Table of submitters by key issues

Table of Submitters and Key Issues		
Number	Name	Key Issue
01	Jacob Sorenson (Out of Scope)	N/A
02	Nick Field	<ul style="list-style-type: none"> <li>• General approach to growth: Other options</li> <li>• Rezoning Requests</li> </ul>
03	Victoria Dungan	General approach to growth: Other options
04	Paul McGrath (BLANK)	N/A
05	Rosalie Kalin / R & R Kalin Partnership/Kalindale Builders Ltd	<ul style="list-style-type: none"> <li>• Collaboration opportunities for growth planning</li> <li>• Outcome statements</li> <li>• General approach to growth: Option 3 - Balanced Focus</li> <li>• Business Capacity</li> <li>• Rezoning Requests</li> </ul>
06	Bev Gibson / Ngāti Tawhirikura Hapū	<ul style="list-style-type: none"> <li>• Tangata whenua aspirations and outcomes</li> <li>• General approach to growth: Not stated</li> </ul>
07	Ministry of Education	<ul style="list-style-type: none"> <li>• Tangata whenua aspirations and outcomes</li> <li>• General approach to growth: Not stated</li> </ul>
08	Pat Sole Surveyors Ltd	<ul style="list-style-type: none"> <li>• General approach to growth: Not stated</li> <li>• Residential Development Capacity</li> </ul>
09	CGR Developments Ltd	<ul style="list-style-type: none"> <li>• Roles and relationships</li> <li>• Outcome statements</li> <li>• General approach to growth: Option 3 - Balanced Focus</li> <li>• Residential Development Capacity</li> <li>• Business Capacity</li> <li>• Rezoning Requests</li> </ul>
10	Royal Forest and Bird Protection Society of New Zealand Inc.	<ul style="list-style-type: none"> <li>• Outcome statements</li> <li>• Natural Environment</li> <li>• Constraints</li> <li>• General approach to growth: Option 3 - Balanced Focus</li> </ul>
11	Summerset Group Holding Limited	<ul style="list-style-type: none"> <li>• General approach to growth: Option 3 - Balanced Focus</li> </ul>
12	NZ Transport Agency / Waka Kotahi	<ul style="list-style-type: none"> <li>• FDS Implementation Plan</li> <li>• Infrastructure</li> <li>• Reverse Sensitivity</li> <li>• General approach to growth: Option 3 - Balanced Focus</li> <li>• Business Capacity</li> <li>• Rezoning Requests</li> </ul>
13	Survey and Spatial NZ Taranaki Branch	<ul style="list-style-type: none"> <li>• General approach to growth: Not stated</li> </ul>
14	Chris Herd and Companies	<ul style="list-style-type: none"> <li>• Collaboration opportunities for growth planning</li> <li>• Outcome statements</li> <li>• Constraints</li> <li>• General approach to growth: Option 3 - Balanced Focus</li> <li>• Business Capacity</li> <li>• Rezoning Requests</li> </ul>

Table of Submitters and Key Issues		
Number	Name	Key Issue
15	Aggregate and Quarry Association	<ul style="list-style-type: none"> <li>• Reverse Sensitivity</li> <li>• General approach to growth: Not stated</li> </ul>
16	Kiwi Trust (Tracey Dempster and Darren Erb)	<ul style="list-style-type: none"> <li>• General approach to growth: Not stated</li> <li>• Rezoning Requests</li> </ul>
17	Rachael Cottam – Meadow View Developments	<ul style="list-style-type: none"> <li>• Collaboration opportunities for growth planning</li> <li>• Outcome statements</li> <li>• General approach to growth: Option 3 - Balanced Focus</li> <li>• Rezoning Requests</li> </ul>
18	Health NZ / Te Whatu Ora	<ul style="list-style-type: none"> <li>• Outcome statements</li> <li>• Natural Environment</li> <li>• General approach to growth: Option 3 - Balanced Focus</li> <li>• Housing Choice</li> </ul>
19	Landpro Limited	<ul style="list-style-type: none"> <li>• Collaboration opportunities for growth planning</li> <li>• PDP impacting development and growth</li> <li>• A regional approach to growth planning</li> <li>• Constraints</li> <li>• General approach to growth: Not stated</li> <li>• Residential Development Capacity</li> <li>• Plan-enabled Capacity</li> <li>• Business Capacity</li> <li>• Rezoning Requests</li> </ul>
20	Johnson Family	<ul style="list-style-type: none"> <li>• Outcome statements</li> <li>• General approach to growth: Option 3 - Balanced Focus</li> <li>• Rezoning Requests</li> </ul>
21	Kāinga Ora – Homes and Communities	<ul style="list-style-type: none"> <li>• Collaboration opportunities for growth planning</li> <li>• FDS Implementation Plan</li> <li>• Tangata whenua aspirations and outcomes</li> <li>• Constraints</li> <li>• General approach to growth: Option 3 - Balanced Focus</li> <li>• Housing Choice</li> <li>• Rezoning Requests</li> </ul>
22	Mike McKie	<ul style="list-style-type: none"> <li>• General approach to growth: Not stated</li> <li>• Residential Development Capacity</li> <li>• Rezoning Requests</li> </ul>
23	Westown Agriculture Ltd – Thomas Family	<ul style="list-style-type: none"> <li>• General approach to growth: Not stated</li> <li>• Residential Development Capacity</li> <li>• Rezoning Requests</li> </ul>
24	Warren and Claire Bolton	<ul style="list-style-type: none"> <li>• Collaboration opportunities for growth planning</li> <li>• Tangata whenua aspirations and outcomes</li> <li>• General approach to growth: Not stated</li> <li>• Residential Development Capacity</li> </ul>
25	Fonterra Limited	<ul style="list-style-type: none"> <li>• Reverse Sensitivity</li> <li>• General approach to growth: Option 3 - Balanced Focus</li> <li>• Rezoning Requests</li> </ul>

Table of Submitters and Key Issues		
Number	Name	Key Issue
26	GJ Pike and Astron Dales Estate Ltd / Smart 2023 Ltd / Delaco Consulting	<ul style="list-style-type: none"> <li>• Collaboration opportunities for growth planning</li> <li>• Outcome statements</li> <li>• General approach to growth: Option 3 - Balanced Focus</li> <li>• Rezoning Requests</li> </ul>
27	Ben Ingram / Taranaki Housing Initiative Trust	<ul style="list-style-type: none"> <li>• PDP impacting development and growth</li> <li>• Outcome statements</li> <li>• A regional approach to growth planning</li> <li>• General approach to growth: Option 3 - Balanced Focus</li> <li>• Housing Choice</li> <li>• Rezoning Requests</li> </ul>
28	Transpower New Zealand	<ul style="list-style-type: none"> <li>• Infrastructure</li> <li>• General approach to growth: Option 3 - Balanced Focus</li> <li>• Plan-Enabled Capacity</li> </ul>
29	GJ Gardner Homes Ltd	<ul style="list-style-type: none"> <li>• Collaboration opportunities for growth planning</li> <li>• Tangata whenua aspirations and outcomes</li> <li>• PDP impacting development and growth</li> <li>• General approach to growth: Not stated</li> <li>• Residential Development Capacity Plan-enabled Capacity</li> <li>• Rezoning Requests</li> </ul>
30	Enviro NZ	<ul style="list-style-type: none"> <li>• Infrastructure</li> <li>• Reverse Sensitivity</li> <li>• General approach to growth: Not stated</li> </ul>
31	Craig Broomhall and Palmbrook Developments Ltd	<ul style="list-style-type: none"> <li>• Collaboration opportunities for growth planning</li> <li>• General approach to growth: Option 3 - Balanced Focus</li> <li>• Plan-enabled Capacity</li> <li>• Rezoning Requests</li> </ul>
32	Luke Conroy	<ul style="list-style-type: none"> <li>• General approach to growth: Not stated</li> <li>• Residential Development Capacity</li> <li>• Rezoning Requests</li> </ul>
33	Raukura Salisbury / Ngā Kaitiaki O Puketapu Hapū Trust	<ul style="list-style-type: none"> <li>• Outcome statements</li> <li>• Tangata whenua aspirations and outcomes</li> <li>• General approach to growth: Not stated</li> </ul>
34	Donna Eriwata / Otaraua Hapū	<ul style="list-style-type: none"> <li>• Tangata whenua aspirations and outcomes</li> <li>• General approach to growth: Not stated</li> </ul>
35	Hywel Edwards	<ul style="list-style-type: none"> <li>• General approach to growth: Option 3 - Balanced Focus</li> <li>• Rezoning Requests</li> </ul>
36	Mitchell Ritai / Te Rūnanga o Ngāti Mutunga	<ul style="list-style-type: none"> <li>• Tangata whenua aspirations and outcomes</li> <li>• General approach to growth: Option 3 - Balanced Focus</li> </ul>
37	David Richards (BLANK)	N/A

## **CLOSING KARAKIA**

Unuhia, unuhia, Unuhia i te uru tapu-nui Kia wātea, kia māmā te ngākau, te tinana Te Wairua i te ara takatū Koia rā e Rongo whakairihia ake ki runga	Draw on, draw on Draw on the supreme sacredness To clear, to free the heart, the body and the spirit of mankind Rongo suspended high above us (in heaven)
Kia wātea, kia wātea Ae rā kua wātea Hau Paimarire	To be cleared of obstruction It is cleared

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.