



Draft Future Development Strategy for Ngāmotu
New Plymouth
2024-2054

Draft Technical Document

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1. Structure and Purpose of this Draft Technical Document

The purpose of this draft Technical Document (the draft TD) is to provide an overview of the methods used and analysis undertaken to prepare the draft Future Development Strategy for Ngāmotu New Plymouth (the draft FDS).

The draft FDS has been prepared by Taranaki Regional Council and New Plymouth District Council (the Councils). Its purpose is to set out the strategic framework to provide for urban growth to meet the needs of New Plymouth district. It gives direction to the community about where and how many new homes and businesses will be located within the District.

Released in March 2024, this draft Technical Document does not duplicate the analysis contained within the draft FDS, rather it is an accompanying document that provides further detail on the matters identified and evaluated. This draft Technical Document will be updated following consultation on the draft TD, and preparation of the final FDS.

This draft TD is structured as follows:

Section 1 sets out the **structure and purpose** of this draft TD.

Section 2 sets out the **relevant background including the statutory requirements** for the preparation and implementation of a future development strategy contained in the National Policy Statement on Urban Development 2020. This section also details the outcomes which guide the draft FDS and provides a high-level overview of the previous growth planning that has been undertaken to prepare for urban growth in the district.

Section 3 sets out **how the Councils have worked with tangata whenua** to develop the draft FDS and summarises the outcomes of hui held with hapū and iwi representatives in 2023/2024.

Section 4 details the **consultation and engagement with the community and stakeholders** in 2023/2024 that informed the draft FDS, and the formal Special Consultative Procedure in early 2024 which will inform the final FDS.

Section 5 provides an **overview of the key inputs and assumptions** used to inform the draft FDS including:

- A summary of the housing and business projections contained in the Housing and Business Capacity Assessment undertaken by the Councils in 2024.
- NPDC's Long-Term Plan and Infrastructure Strategy.
- Identified constraints on development.
- Infrastructure and modelling including three waters and transport.
- Development of outcomes.

Section 6 sets out how different **spatial scenarios** were developed and assessed to arrive at the preferred scenario.

Section 7 sets out the findings of the **evaluation process** that was undertaken to arrive at the recommended strategy.

Section 8 provides a list of **appendices** to this draft Technical Document.

2. Background

2.1. Statutory Requirements

Resource Management Act 1991

The draft FDS is a Resource Management Act 1991 (RMA) planning document. The purpose of the RMA is the sustainable management of natural and physical resources. In achieving this purpose, matters of national importance must be recognised and provided for (section 6 matters).

These matters of national importance are summarised as follows:

- The preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and protection from inappropriate development (s6(a)).
- The protection of outstanding natural features and landscapes (s6(b)).
- The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna (s6(c)).
- The maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers (s6(d)).
- the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga (s6(e)).
- The protection of historic heritage from inappropriate subdivision, use, and development (s6(f));
- The protection of protected customary rights (s6(g)).
- The management of significant risks from natural hazards (s6(h)).

There are a range of other matters that must also be given particular regard, and these are listed in Section 7 of the RMA. They include kaitiakitanga, the ethic of stewardship, the efficient use and development of resources, the maintenance and enhancement of amenity values and the quality of the environment, the intrinsic values of ecosystems and the effects of climate change. Section 8 of the RMA requires the Councils to take into account the principles of the Te Tiriti o Waitangi.

Local Government Act 2002

The National Policy Statement on Urban Development (NPS-UD) requires the Councils to use the special consultative procedure in section 83 of the Local Government Act 2002 (LGA) when preparing a future development strategy. This procedure sets out detailed consultation requirements. This requires the Councils to identify and analyse the reasonably practicable options that are relevant to the proposal. Section 6 of this report sets out the growth options for the New Plymouth district and Section 7 evaluates them in detail.

National Policy Statement on Urban Development 2020

The Government introduced the NPS-UD in August 2020 (updated 2022). The NPS-UD outlines the requirements for what a future development strategy must show and be informed by.

The New Plymouth district is a Tier 2 Urban Environment under the NPS-UD. Both Taranaki Regional Council (TRC) and the New Plymouth District Council (NPDC) have a statutory responsibility as Tier 2 local authorities to develop and implement an FDS for the New Plymouth district. The NPS-UD sets out specific requirements for Tier 2 urban environments and local authorities, with Policies 1, 2 and 5 being particularly relevant. These require that the Councils plan for a well-functioning urban environment, provide for at least sufficient development capacity to meet demand over the short, medium and long term, and enable heights and densities commensurate with levels of accessibility or relative demand in any given area.

Tier 1 and Tier 2 local authorities are required to prepare a future development strategy every six years, and update them every three years, to strategically plan for growth.

2.2. Preparation and Main Information Requirements of a FDS

The NPS-UD outlines the criteria a future development strategy must meet regarding its purpose, content and development. These are outlined in the following paragraphs.

Objective 1 of the NPS-UD is that *‘New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future’*.

Policy 1 defines a ‘well-functioning urban environment’:

...urban environments that, as a minimum:

- (a) have or enable a variety of homes that:
 - (i) meet the needs, in terms of type, price, and location, of different households; and*
 - (ii) enable Māori to express their cultural traditions and norms; and**
- (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
- (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
- (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- (e) support reductions in greenhouse gas emissions; and*
- (f) are resilient to the likely current and future effects of climate change.*

The purpose of a future development strategy is to promote long-term strategic planning by detailing how local authorities intend to:

- Achieve well-functioning urban environments¹ in both existing and future urban areas;
- Provide sufficient development capacity over the next 30 years to meet expected demand; and
- Support the coordination of planning decisions made under the Resource Management Act (RMA) with those related to infrastructure planning and funding decisions².

Policy 2 requires that Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium terms, and long term.

Every future development strategy must spatially identify:

- The broad locations of where development capacity will be provided for in both existing and future urban areas.
- The development infrastructure and additional infrastructure required to service that development capacity and
- Constraints on development.³

A future development strategy requires a clear statement of hapū and iwi values and aspirations for urban development⁴.

What is the FDS informed by?

The NPS-UD requires that the draft FDS be informed by those matters set out in Section 3.14(1). More detail for each of these matters is provided as follows:

a) The most recent applicable Housing and Business Capacity Assessment

The Councils have updated the Housing and Business Development Capacity Assessment (HBA) which was published in February 2024 and it has been used as the basis for the draft FDS. Further information about the HBA can be found in Section 5 of this report. The updated HBA can be found on this webpage: [PLACEHOLDER](#)

b) A consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS

A number of spatial scenarios have been considered as part of the development of the draft FDS. These spatial scenarios, along with the advantages and disadvantages of each are set out both in the draft FDS and Section 6 of this draft Technical Document.

¹ Clause 2.2 (Policy1) – Policies – NPS-UD

² Clauses 3.13(1)(a-b) – Purpose and content of FDS – NPS-UD

³ Clause 3.13 (2)(a-c) – Purpose and content of FDS – NPS-UD

⁴ Clause 3.13 (3) – Purpose and content of FDS – NPS-UD

c) *The relevant long-term plan and its infrastructure strategy, and any other relevant strategies and plans*

NPDC's 2021-2023 Long Term Plan (LTP) and Infrastructure Strategy have been taken into account in preparing this draft FDS. One of the key drivers of a future development strategy, as reflected in the purpose, is to integrate planning decisions with infrastructure planning and funding. Taking stock of NPDC's infrastructure planning has been critical to ensuring the overall growth strategy makes the most efficient use of existing and committed infrastructure. Engineers from the Councils have contributed to the development of the spatial scenarios and evaluation of potential growth areas, as well as identifying strategic development infrastructure. This has included identifying (broadly) the infrastructure necessary to support the spatial scenarios assessed.

Other relevant strategies that have been considered in the preparation of this draft FDS includes plans and strategies that relate to planning for growth, and these are referred to where relevant in this report.

TRC's 2021-2023 Long Term Plan (LTP) and infrastructure strategy have also been taken into account in preparing this draft FDS. Specific infrastructure provision relating to the public transport and flooding are not affected in the short to medium term, and future considerations will be informed by the FDS going forward.

d) *Māori, and in particular, tangata whenua, values and aspirations for urban development*

Over the last 10 years there has been a significant body of work that has been produced by Ngā Hapū me Ngā Iwi o te rohe o Ngāmotu that focuses on urban development matters in the district. Iwi Management Plans, the mahi of NPDC's Ngā Kaitiaki group⁵ during NPDC's District Plan Review and hapū and iwi submissions on the Proposed New Plymouth District Plan (PDP) (legal submissions, expert planning and cultural evidence) all have helped inform the preparation of the draft FDS.

NPDC has met with Ngā Kaitiaki to discuss the strategic role of the draft FDS, the inclusion of the tangata whenua, values and aspirations statements and how and where the district grow in the future. Engagement with iwi and hapū will be on-going throughout the consultation period on the draft FDS.

e) *Feedback received through consultation and engagement*

Once a draft FDS is prepared, local authorities must use the section 83 special consultative procedure under the LGA⁶.

⁵ NPDC working group made up of mandated iwi and hapū representatives that was originally set up to assist in the review and preparation of the PDP. The group now provide a Te Ao Māori (Māori worldview) on strategic resource management matters.

⁶ Clause 3.15 (1) – Consultation and engagement – NPS-UD

The Councils are now seeking written feedback on the draft FDS through submissions, and submitters will also have the opportunity to speak to their submission at a hearing. The draft FDS will then be updated in response to feedback received through this statutory consultation SCP process.

f) Every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement

The draft FDS has also been informed by the policy set in the following national policy statements:

- New Zealand Coastal Policy Statement 2010 (NZCPS)
- National Policy Statement for Freshwater Management 2020 (NPS-FM)
- National Policy Statement on Electricity Transmission 2008 (NP-SET)
- National Policy Statement for Highly Productive Land 2022 (NPS-HPL)
- National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB).

In addition, the Councils must engage and consult with the following groups when preparing the draft FDS to undertake the above step:

- Local authorities with significant ties to relevant infrastructure or communities
- Relevant central government agencies
- Relevant hapū and iwi
- Providers of additional infrastructure
- Relevant providers of nationally significant infrastructure and
- The development sector⁷.

Finally, an implementation plan must be prepared and implemented. Updated annually, an implementation plan does not need to form part of a future development strategy, nor is it required to be part of the special consultative procedure⁸. However, for supplementary information purposes, the draft FDS for Ngāmotu New Plymouth does include a draft Implementation Plan.

The draft FDS addresses and responds to the criteria mentioned above. The key components of developing the draft FDS are set out in the remainder of this report.

2.3. Iwi Environmental Management Plans

Iwi Environmental Management Plans have been taken into account when preparing the draft FDS. The following Iwi Environmental Management Plans are relevant (albeit at various stages):

⁷ Clause 3.15 (2)(a-f) – Consultation and engagement – NPS-UD

⁸ Clause 3.18(1-3)(4)(a-c) – FDS implementation plan – NPS-UD

Ngāruahine Kaitiaki Plan - Te Uru Taiao o Ngāruahine (2021)

The Ngāruahine rohe only intersects with a small part of land to the south of the New Plymouth district. In respect of land, Ngāruahine consider that the *“on-going development of land for residential and commercial purposes is likely to exacerbate environmental pressures affecting the health and mauri of our Taiao.”* They note that subdivision, including land amalgamation and boundary adjustments have actual and potential impacts on their cultural and kinship values or interests and that, although papakāinga development is a permitted activity under relevant District Council plans, there are still several barriers to realizing Papakāinga within their rohe including a lack of specific objectives in relation to papakāinga.⁹ In Method 3 of the Plan Implementation and Review section of Te Uru Taiao o Ngāruahine, Te Korowai o Ngāruahine Trust TKoNT encourages all district councils to work with their hapū to determine the appropriate locations for papakāinga housing development. It is their expectation that zoning in the District Plans will reflect collaboration and a long-term vision for the development of Papakāinga in their rohe.¹⁰

Tai Whenua, Tai Tangata, Tai Ao, Te Ātiawa Iwi Environmental Management Plan (2019)

This is a document for Te Ātiawa Iwi to guide and inform decision making by the iwi. It is structured into five chapters, then schedules and appendices reflecting the interrelated natural systems. It also sets out Te Ātiawa’s resource management issues, objectives and policies. Tai Whenua Tai Tangata, Tai Ao Te Ātiawa iwi includes the following issues and objectives which are relevant to urban growth:

- Issue TTAN4: Inappropriate subdivision and development can generate effects on Te Ātiawa values. The objectives and policies to address this issue within the rohe of Te Ātiawa are:

Objectives

- Ob. TTAN4.1 the interests, values and protection of wāhi tapu/wāhi taonga, urupā and sites of significance to Māori are provided for in the process and design of subdivisions.
- Ob. TTAN4.2 Acknowledge and provide for Te Ātiawa values and the expressions of our narrative in the built form and landscaping.
- Ob. TTAN4.3 Water, stormwater and wastewater solutions are co-designed with Te Ātiawa to ensure Te Ātiawa values associated with waterbodies impacted at the time of subdivision are protected and enhanced.
- Ob. TTAN4.4 Acknowledge and provide for Te Ātiawa cultural landscapes in the built design to connect and deepen our ‘sense of place’.

Policies

- Pol. TTAN4.2 Require regional council and district councils to consider cumulative effects and future land uses when assessing applications to subdivide.
- Pol. TTAN4.3 Require regional council and district councils to engage at Plan Change stage, where plan changes are required to enable subdivision, to identify potential effects on wāhi tapu/wāhi taonga, urupā and sites of significance to Māori and Te Ātiawa cultural values.

⁹ Te Uru Taiao o Ngāruahine: Ngāruahine Kaitiaki Plan 2021, Te Korowai o Ngāruahine Trust, August 2021, p 31.

¹⁰ Te Uru Taiao o Ngāruahine: p 73.

- Pol. TTAN4.15 Encourage retaining the natural landform and topography within the subdivision. Pol. TTAN4.16 Encourage and support Te Ātiawa, as a property developer, to set the highest possible standard of best practice for residential land developments in the rohe.

Tai Whenua Tai Tangata, Tai Ao Te Atiawa iwi Environmental Management Plan 2019 clearly states that the Te Kotahitanga O Te Atiawa Taranaki Iwi will not support any subdivision and development that adversely impacts the important cultural values associated with landscapes of importance to Te Atiawa (hapū, marae/pā).

Taiao, Taiora: An Iwi Environmental Management Plan for the Taranaki Rohe (2018)

This plan was lodged with the Councils in 2018. Taiao, Taiora is a document for Taranaki Iwi to guide and inform decision making by the Iwi. It is structured into five sections, reflecting the interrelated natural systems. Taiao, Taiora sets out issues, objectives and policies. Urban growth is referred to as urban growth and development. The section on Papatuanuku (the land) includes the following relevant issue and objective:

- Issue 9. Poorly designed subdivision and development can lead to unsustainable and inefficient land use, destruction of wāhi tapu and other important sites.
- Objective 5. The whenua will be cared for by Taranaki Iwi and others for mutual, reciprocal benefit for the whole community. Taranaki Iwi are seen as leaders in sustainable living and sustainable land management on our whenua; Taiao, Taiora clearly states that the Taranaki Iwi will not support any subdivision and development that adversely impacts the important cultural values associated with landscapes of importance to Taranaki Iwi (hapū, marae/pā).

The Maniapoto Iwi Environmental Management Plan (Ko Tā Maniapoto Mahere Taiao) (2016)

The degradation of the mauri and wairua of the environment and the decline and loss of indigenous flora and fauna is a concern for Maniapoto. There are increasing pressures on resources from agriculture, tourism, forestry, industry and urban activities. Maniapoto are not opposed to development, however, they consider the historic cost to the environment to be unacceptable. The parts of the plan that are relevant to urban growth is that they would like to avoid unsustainable and inappropriate land use practices. There is a chapter on urban planning and development which is relevant to growth and they would like to see urban planning and development provide for the environmental, economic, social and cultural needs of Maniapoto. This plan is still under revision and has not been lodged with the Councils.

Ngāti Mutunga Iwi Environmental Management Plan (2014 update)

The plan has a chapter on subdivision, development and land use which is relevant to growth. Under this chapter an objective seeks to encourage well planned development that avoids adverse effects on our cultural values, protects the environment and provides a great quality of life for everyone – now and in the future. This plan is still under revision and has not been lodged with the Councils.

2.4. Previous Growth Planning in New Plymouth

The draft FDS builds on the comprehensive growth planning undertaken by NPDC and the growth philosophy of the PDP to prepare for the urban growth in the district. The following section outlines the key milestones and supporting documents in the district's growth planning from 2005 to 2023.

2.4.1 Operative New Plymouth District Plan (2005)

The following sections outline the plan changes undertaken by NPDC to the Operative New Plymouth District Plan 2005 (ODP) to provide for urban growth prior to the development and notification of the PDP in September 2019.

NPDC Plan Change 15 – Future Urban Development Overlay

This Plan Change implemented NPDC's Framework for Growth (2008) and the Oākura and Urenui structure Plans (2006). It added a Future Urban Development (FUD) Overlay to the ODP, including associated rules, to provide a level of control to land use activities and subdivision within, and land use activities adjacent to, the future urban growth areas identified by NPDC's Framework for Growth, the Oākura Structure Plan (2006), and Urenui Structure Plan (2006). Areas included in the overlay included Bell Block Area Q (Wills Road to Airport Drive), New Plymouth Area N (Egmont Road to Henwood Road), New Plymouth Areas S, K and L (Smart Road), Waitara, Oākura, Okato, Egmont Village, Inglewood, Frankley/Cowling, Onaero, and Urenui. Plan Change 15 was made operative in March 2013.

Various Rezoning Plan Changes 2009-2018

NPDC has also approved the following plan changes to facilitate urban growth:

- Private Plan Change 2 rezoned land from Rural Environment Area to Industrial C Environment Area. The land is located east of Egmont Road, north of the Marton-New Plymouth railway line and south of SH3 at Bell Block. The total land area is approximately 2.5 hectares. Plan Change 2 was made Operative 12 May 2009.
- Private Plan Change 9 rezoned the Hawkswood Structure Plan Area (Upper Vogeltown area, west of Carrington Road) from Rural Environment Area to Residential A Environment Area. Plan Change 9 was made Operative 18 March 2008.
- Plan Change 17 rezoned land on Armstrong Ave, Waitara from Rural Environment Area to Residential A Environment Area; removed the FUD Overlay for Waitara Area A; added a Structure Plan Overlay and associated policies, reasons and rules. Plan Change 17 was made Operative 18 January 2014.
- Plan Change 18 rezoned the rural environment between Karo Park and the Kurapete Stream and Karo Park Open Space B Environment Area, Inglewood to Residential A Environment Area and removed the FUD Overlay over this area. Plan Change 18 was made Operative 10 August 2013.
- Plan Change 20 rezoned the Bell Block Area Q from Rural Environment Area to Residential A Environment Area and applied a FUD Overlay to Area R. Plan Change 20 was made Operative 17 August 2015.
- Plan Change 25 rezoned parts of the Rural Environment Area on Cowling Road, Tukapa Street and Frankley Road to Residential A Environment Area. Plan Change 25 was made Operative 29 August 2011.

- Plan Change 47 made minor amendments to Area Q Plan Change. It enabled some residential development in stage 2 of Area Q by changing the prohibitive activity status that applied to access from Stage 2 to Airport Drive. Plan Change 47 was made Operative 8 February 2018).
- Private Plan Change 49 Waitara Area D (rezoned FUD Overlay) rezoned 11.34 hectares of land on the southern side of Waitara from Rural Environment Area to Residential A and Open Space Environment Areas to facilitate residential development and use. Plan Change 49 was made Operative 20 April 2021.

Blueprint 2015

The New Plymouth District Blueprint presented a 30-year vision which directed NPDC activities towards achieving a cohesive growth strategy and integrated social, economic and environmental outcomes for the district that would contribute to all the community outcomes. Growth was identified as one of the eight key directions in the Blueprint. It directed NPDC to develop a cohesive growth strategy that strengthened the city and townships by determining appropriate locations for growth included providing adequate land supply and planning for network infrastructure.

Infrastructure Strategy 2021-2051

All councils are required to prepare an infrastructure strategy as part of their three yearly long-term planning process. The Infrastructure Strategy covers a period of 30 years and identifies the key infrastructure issues facing the Councils, the principal options for managing those issues, and the implications of the various options.

NPDC's Infrastructure Strategy addresses the maintenance, renewal, and resilience of infrastructure assets for water supply, transportation, wastewater (sewage), stormwater, parks and open spaces, solid waste and refuse collection, and flood protection. They also model and forecast infrastructure required for growth in the district. The 2018 Infrastructure Strategy was used to inform the development of the PDP and refers to infrastructure issues in future growth areas and identified estimated lot numbers in Area Q, Junction, Carrington, Ōākura, Okato, Frankley/Cowling, Waitara East and Smart Road areas.

TRC's Infrastructure Strategy addresses the flood protection requirements for the region, with no other infrastructure assets in the other classes. This strategy, therefore, focuses on the river and flood control schemes. There are two significant flood control schemes on the Waitara and Waiwhakaiho Rivers, alongside a number of relatively minor schemes designed to address particular issues at specific locations. In 2013/2014, TRC completed an upgrade of the Lower Waiwhakaiho Flood Control Scheme, followed by the upgraded of the Lower Waitara River Flood Control Scheme in June 2016. These enhancements to the two key flood control schemes are designed to offer a 1% annual exceedance probability (AEP) – or 1 in 100 year protection, with allowance for climate change through to the year 2065.

2.4.2 Proposed New Plymouth District Plan (notified September 2019)

The PDP provided a cohesive growth strategy for the district. It implemented the Blueprint 2015 and was informed by the Housing and Business Capacity Assessment (HBA) 2019¹¹ and the growth requirements of the (then) National Policy Statement on Urban Development Capacity 2016 (NPS-UDC) to provide for sufficient development capacity for housing and business land. The HBA report was jointly produced by the Councils to meet the requirements of the NPS-UDC¹².

The PDP provided for future housing and business growth across the district in the following ways:

- Provided sufficient development capacity for housing and business land
- Included strategic objectives on urban growth (urban form and development) which covered:
 - i) the district developing and changing over time.
 - ii) ensuring there is sufficient land available to meet the short, medium and long-term housing demands of the district.
 - iii) there is sufficient land for industrial activities in the short, medium and long-term in appropriate locations.
 - iv) a variety of housing types, sizes and tenures.
 - v) the district has a hierarchy of vibrant and viable centres.
 - vi) the hierarchy of centres is maintained.
 - vii) business service activities, commercial service activities and retail activities located outside of centres do not undermine the role and function of the district's centres or the hierarchy of centres.
 - viii) Urban environments are well-designed, liveable, connected, accessible and safe spaces for the community to live, work and play.
- Introduced a Medium Density Residential Zone, which increased the feasible infill dwellings from 961 in the ODP to 1406 in the PDP¹³.
- Enabled a more compact urban form by:
 - Deleting six existing FUD Overlay areas under the ODP on the basis that the areas are out of scale/context with these townships and cannot be feasibly developed; and
 - Reducing the area of Okato, Area N, Waitara East FUD Overlay.
- Introduced four new Structure Plan Development Areas: DEV2 - Carrington, DEV3 - Junction, DEV4 - Oropuriri and DEV5 - Patterson, and carried over the Bell Block Area Q Structure Plan Development Area to provide for urban growth in the short to medium term (under 10 years).
- Introduced 3 new Future Urban Zones (Ranfurly Street Waitara, Frankley Cowling and Junction Street – Stage 2) to provide adequately land for long term growth (10 to 30 years).

Of particular note to this draft Technical Document was the further work undertaken as part of the hearing process, notably the [Housing Capacity Assessment 2021](#) (in so far as it relates to housing). The 2021 assessment was a detailed analysis of housing growth across the New Plymouth district, based on current and future levels of demand, supply and development capacity. This provided a robust and updated evidence base to inform decision making.

¹¹ [Housing and Business Development Capacity Assessment \(trc.govt.nz\)](https://trc.govt.nz/)

¹² The NPS-UD came into force on 20 August 2020, after the PDP was notified and replaced the NPS-UDC. The NPS-UD retains and strengthens the foundation concepts of the NPS-UDC and moves beyond a land capacity-based approach. The NPS-UD defines and promotes 'well-functioning environments' which form the core of several objectives and policies.

¹³ [Section 42a Report - UFD Strategic Objectives](#), Para 115.

A key theme of the submissions received on the PDP was to enable growth to provide more land for housing. In particular, a large number of submission points were made by the newly established Kāinga Ora Homes and Communities (formally Housing New Zealand) who wanted increased provisions relating to intensification and rezoning requests to allow for housing beyond NPDC's identified NPS-UD requirements.

In addition, the district's hapū and iwi dedicated considerable time and mahi into the PDP hearings. Ngā Hapū me Ngā Iwi o te rohe o Ngāmotu produced 195 pieces of comprehensive cultural advice in the form of evidence and speaking notes. Ensuring urban growth did not have adverse effects on cultural values, including sites and areas of significance to Māori and promoting connections to cultural landscapes were key themes of hapū and iwi submissions and evidence.

[2.4.3 Proposed New Plymouth District Plan – Appeals Version \(notified 14 September 2023\)](#)

The Proposed New Plymouth District Plan Appeals Version (PDP-AV) was publicly notified on 14th September 2023 and was prepared in accordance with the NPS-UD.

The key changes made as a result of the decisions on the PDP relating to urban growth include:

- Refining the urban growth strategic objective to promote the concept of “well-functioning urban form” and strengthening the centres hierarchy and clarifying the types of growth that will be used to meet housing development capacity over the short, medium and long-term.
- Rezoning of more medium density land and also allowing up to three residential units per site, as a permitted activity if effects standards are met. Additionally, four or more residential units per site are provided for as a restricted discretionary activity and is subject to notification rule precluding the activities from public and limited notification.
- Refining four Structure Plan Development Areas to better recognise cultural values and deleting the Oropuriri Structure Plan Development Area and adding Johnston Street, Waitara – Structure Plan Development Area.
- The Oropuriri Structure Plan Development Area was rezoned to Oropuriri Future Urban Zone, which was increased in size from the notified PDP.
- Increasing the building heights in the City Centre Zone.
- Rezoning residential land on the fringes of urban areas; and
- Enabling living activities, including multi-unit housing developments, in a new Mixed Use Zone Living Precinct.

3. Tangata Whenua

This section sets out the significant body of work that has been produced by Ngā Hapū me Ngā Iwi o te rohe o Ngāmotu that focuses on urban development matters in the district. It also sets out the process tangata whenua have worked with the Councils to develop their draft values and aspiration statements required by the NPS-UD.

Ngā Kaitiaki Roopū

Ngā Kaitiaki is a working group made up of mandated hapū and iwi representatives that was originally set up to assist in the review and preparation of the PDP.

As a result of the discussions with Ngā Kaitiaki on their mahi during the District Plan Review, a set of four Kaupapa Māori values were incorporated into the PDP which guide how NPDC, hapū and iwi and other stakeholders would work together and respond on activities occurring throughout the district. The four Kaupapa Māori values are 'Kaitiakitanga', 'Ūkaipotanga', 'Rangatiratanga' and 'Kotahitanga', and they are summarised in the [How the Plan Works / General Approach](#) section of Part 1 of the PDP and in the [Tangata Whenua section of the PDP](#).

Iwi and Hapū submissions to the PDP

Many hapū, iwi and marae groups in the district made submissions to the PDP hearings process, with more than 970 original submission points and 1,170 further submission points. Submission topics included ecosystems and indigenous biodiversity, sites and areas of significance to Māori, special purpose zones, design guidelines and residential zones. Hapū and iwi submitters made submissions on various aspects of urban growth and development as they arose in the hearings, including the hearings on strategic objectives. Three of the Urban Form and Development strategic objectives incorporate matters relating to Tangata Whenua: [Strategic Direction - Urban Form and Development](#).

Pre-Draft Engagement on the FDS with Ngā Kaitiaki Roopū

Using the submissions and hearing material, NPDC identified some draft themes that could form the basis for iwi and hapū values and aspiration statements for urban development the draft FDS. Initial engagement with Ngā Kaitiaki was undertaken on 6 December 2023 to seek guidance and comments on the views of Tangata Whenua, and their feedback on the draft aspirations, themes and values that NPDC had developed.

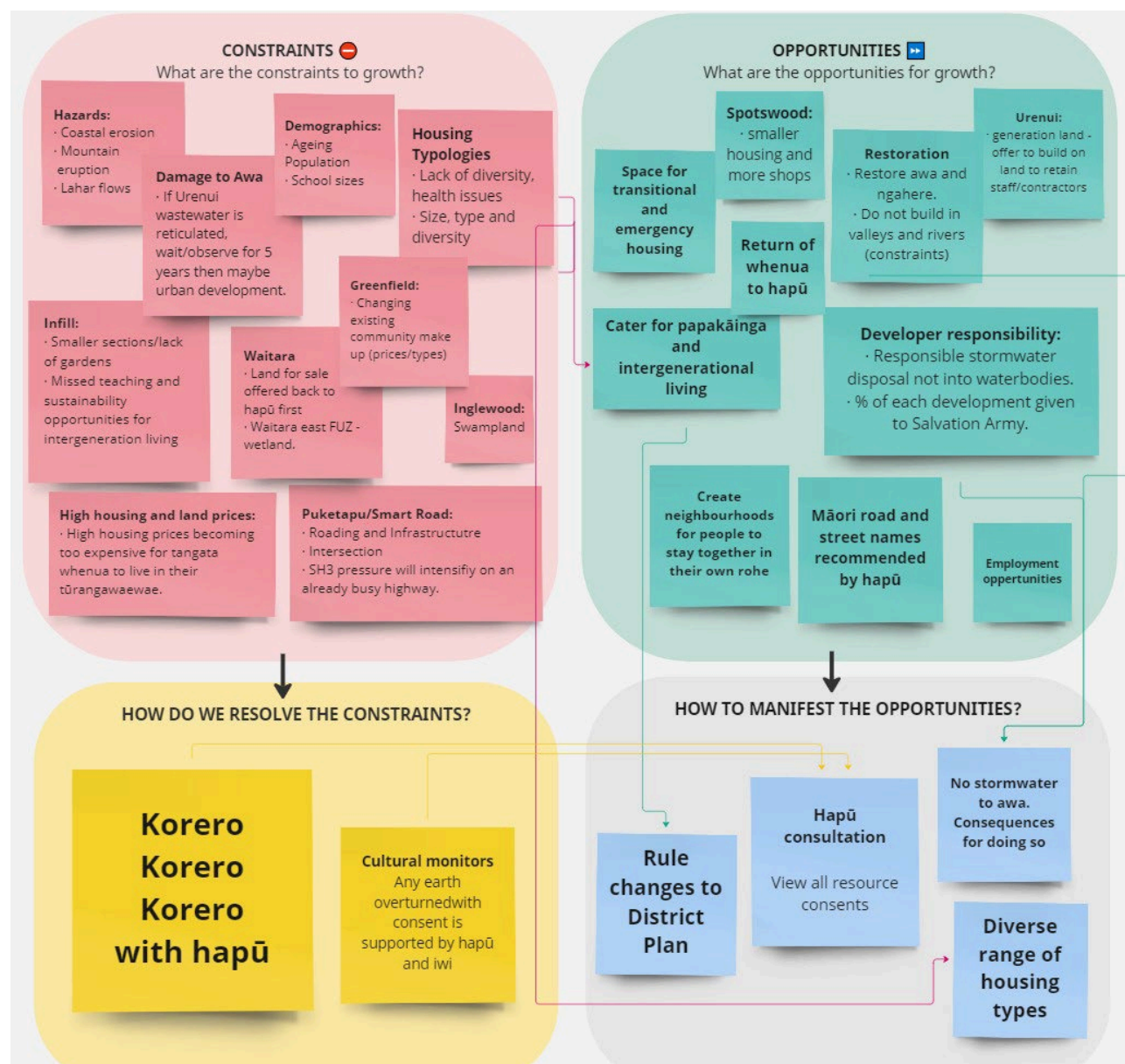
Draft themes presented were:

- Urban design must take the wider environment into account.
- Tangata whenua want their world to be visible and to see themselves reflected in the environment.
- Colonisation, breaches of Te Tiriti and the loss of ancestral land continue to affect iwi and hapū today; and
- Using Mātauranga Māori and Māori design principles = good urban design outcomes for the whole district.

On 24 January 2024 NPDC undertook a workshop with Ngā Kaitiaki to work through the draft themes and the matters specific to each hapū rohe. Maps were used to discuss issues and opportunities and to prioritise where hapū would like growth to occur. As outlined in Figure 1 below, some key messages taken from the korero on constraints and opportunities included:

- Housing choice – the need for both smaller whare and larger sites containing multiple whare for intergenerational living;
- The need for whānau to live in places that they are traditionally associated with;
- Housing affordability – places to rent and to buy;
- Infrastructure needs to be in place or upgraded before growth occurs; and
- Urban form must not degrade the natural environment.

Figure 1: Ngā Kaitiaki Feedback



The group advised that the themes and aspiration statements needed refining, and a subsequent detailed redrafting session was held on 1 February 2024 where the group refined the content to inform the draft FDS.

The refined aspiration statements became:

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

The draft aspiration statements prepared by Ngā Kaitiaki are contained in the draft FDS itself and may change as a result of tangata whenua submissions.

The feedback received from the hui has been used to inform the draft FDS. In addition, the discussion points and feedback have been collated and sent to hapū as information they can reference to inform the basis of their submissions (once the draft FDS is released for consultation). The Councils will continue to meet and engage with hapū through the process as required.

In addition to this engagement, a meeting was held with a representative of Te Atiawa Iwi Holdings LP to understand their views and aspirations in relation to urban development in the district. This meeting highlighted a preference for this group to pursue infill and medium density housing opportunities, as they see significant benefits in doing so.

4. Consultation and Engagement with Community and Stakeholders

The development of the draft FDS has been informed by the engagement required under Part 3.15 of the NPS-UD.

This includes engagement with neighbouring local authorities, central government agencies, infrastructure providers and the development and technical professionals sector. The form and outcomes of this engagement is summarised in the following paragraphs.

Part 2.15 of the NPS-UD also requires engagement with relevant hapū and iwi. The process and outcomes from this engagement is set out in Section 3 above.

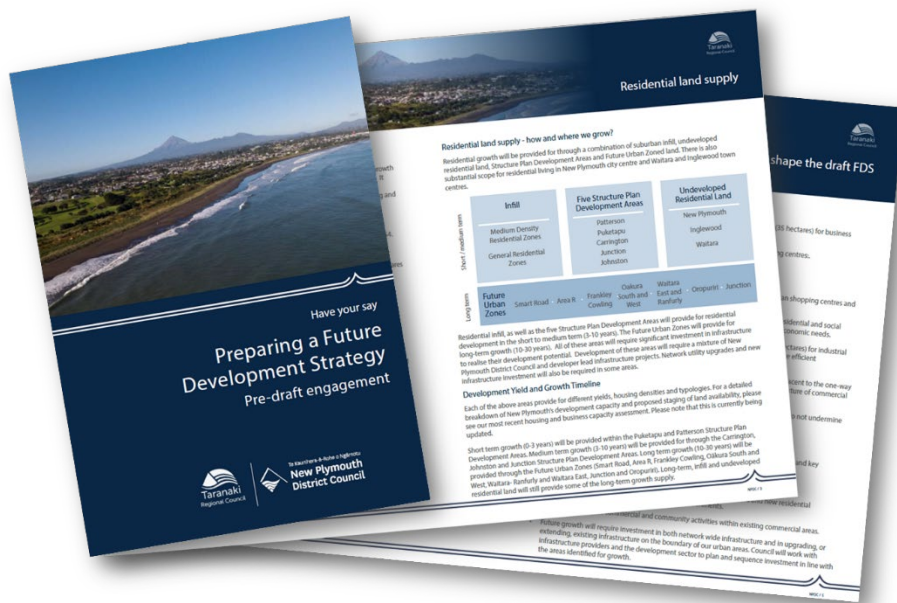
As well as the NPS-UD mandated engagement and consultation, the Councils also have relied heavily on the engagement and input from stakeholders provided as a part of the preparation and hearings for the PDP. This is because there is significant overlap in the matters considered, particularly in relation to the enablement of housing and business activities and ensuring the district develops in a way that provides for a well-functioning urban environment.

4.1. October/December 2023 Targeted Pre-Draft Engagement

The Councils initiated consultation with all parties through the circulation of pre-draft engagement documents. These were provided to members of the development and technical professionals sector (key landowners/developers, surveyors and planners), government agencies and infrastructure providers.

This pre-draft engagement outlined why the Councils were undertaking this work, what we needed to provide for (based on the most recent HBA data available) and where and when we intended to provide this.

The engagement document requested feedback and invited interested parties to meet with the Councils. The document specifically sought feedback on the proposed locations for growth, constraints on development, known infrastructure requirements and any other general feedback.



FDS Development and technical professionals Sector Workshop

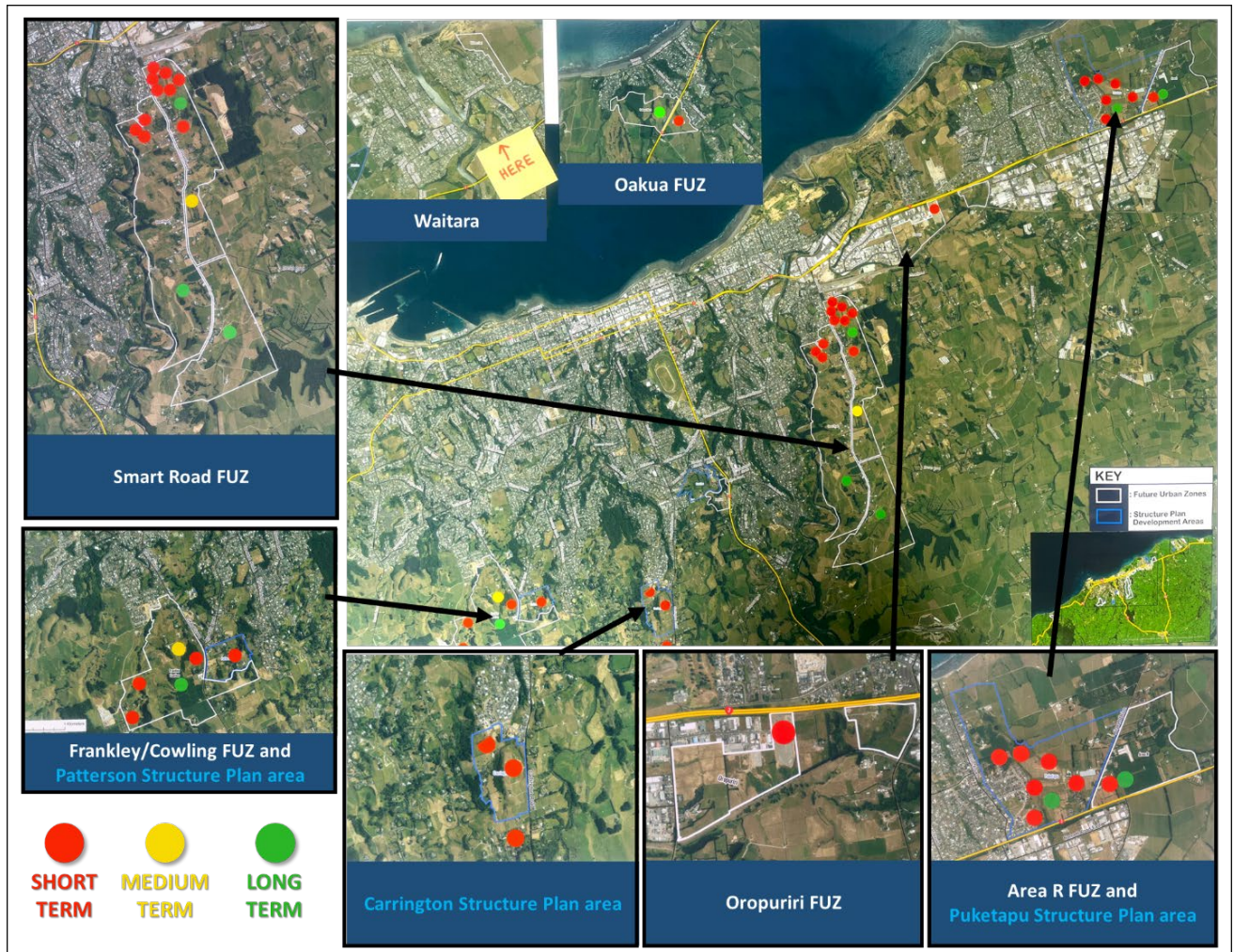
Early engagement and consultation was held with members of the district's development community in accordance with the requirements of the NPS-UD.

Members of the development community were invited to an information sharing and workshop session held on 5 December 2023 with a focus on the opportunity to input into thinking on the draft FDS. This session was hosted at the NPDC Civic Centre and jointly led by NPDC and TRC staff.

Feedback was also accepted through email, online survey and one-on-one meetings with NPDC.

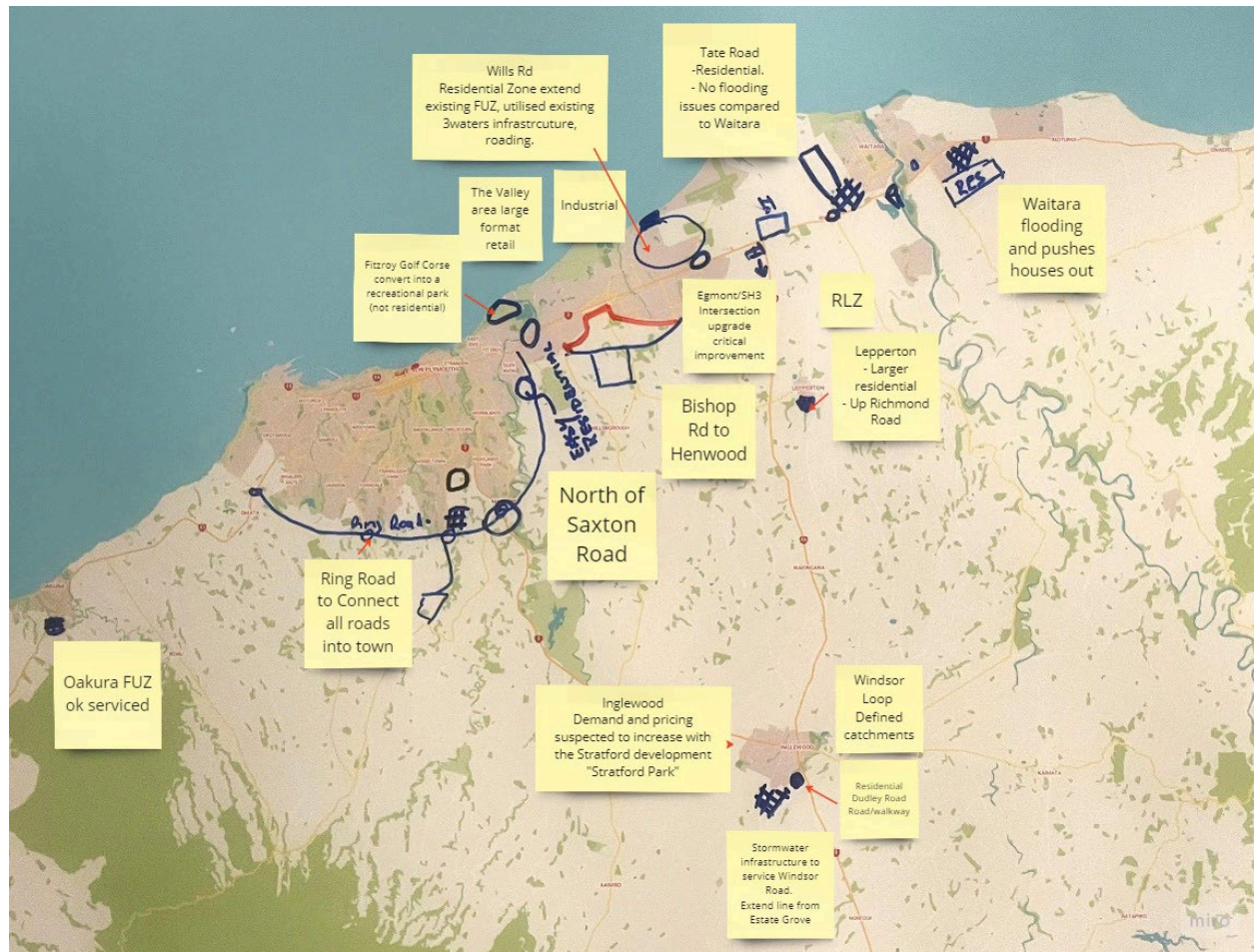
The interactive session included three workshop activities. The first was asking whether they agree with the locations that have been identified for growth and for them to signal on maps how they would prioritise growth areas in relation to urgency. Three colours of sticky dots were provided to gauge where short, term, medium-term and long-term growth should be prioritised across Future Urban Zones (FUZ) and Structure Plan Development Areas. The results are shown in Figure 2 below.

Figure 2: 5 December 2023 Workshop Session 1



The second workshop task was to use maps identifying any additional areas that they felt might be worthy of consideration. The results are shown in Figure 3 below.

Figure 3: 5 December 2023 Workshop Session 2



The third workshop task sought the developers' view of the constraints and opportunities that NPDC should be aware of for each growth area based on their experience of those areas. The results are shown in Figures 4 and 5 below.

Figure 4: Future Urban Zone Feedback

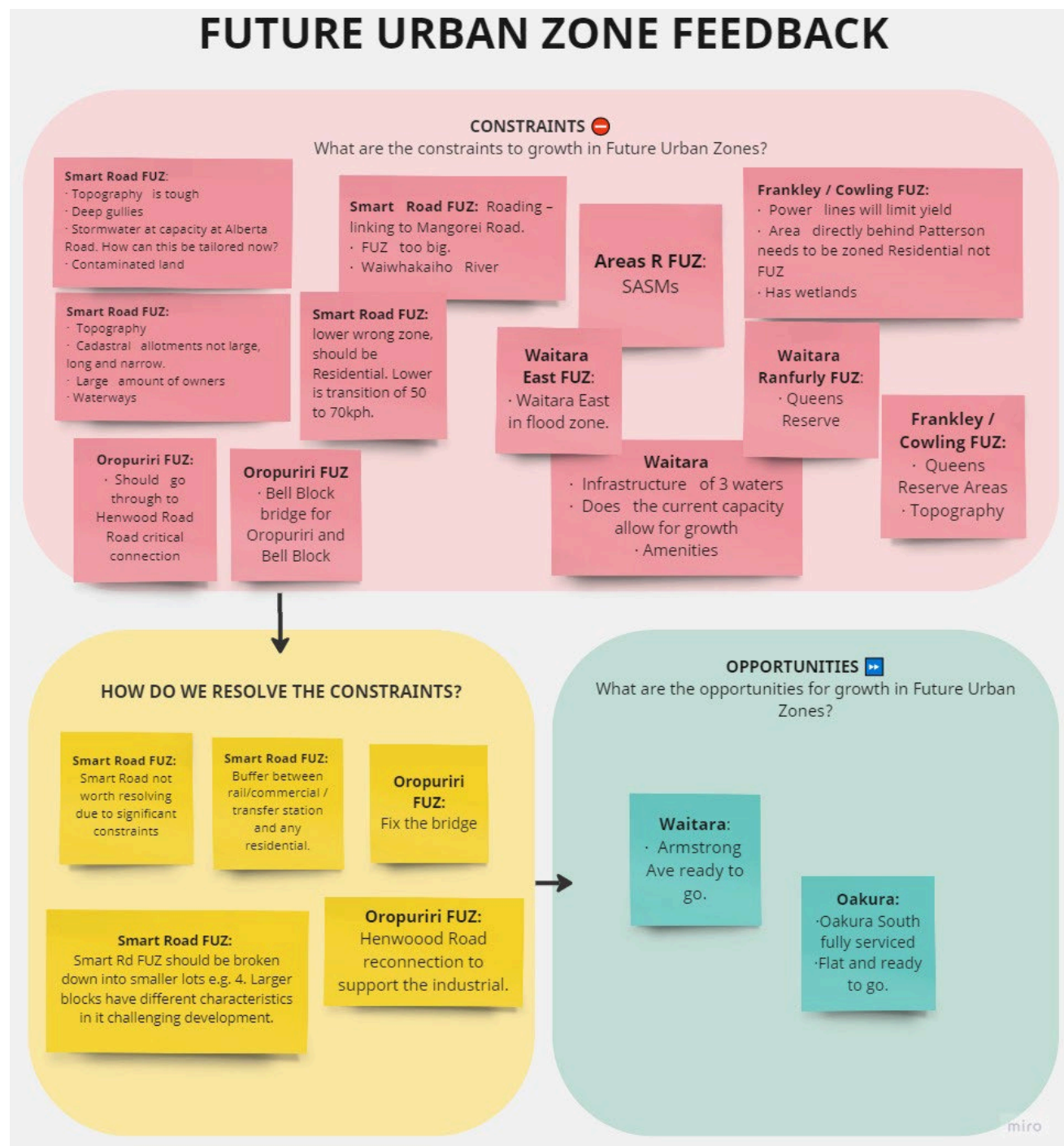
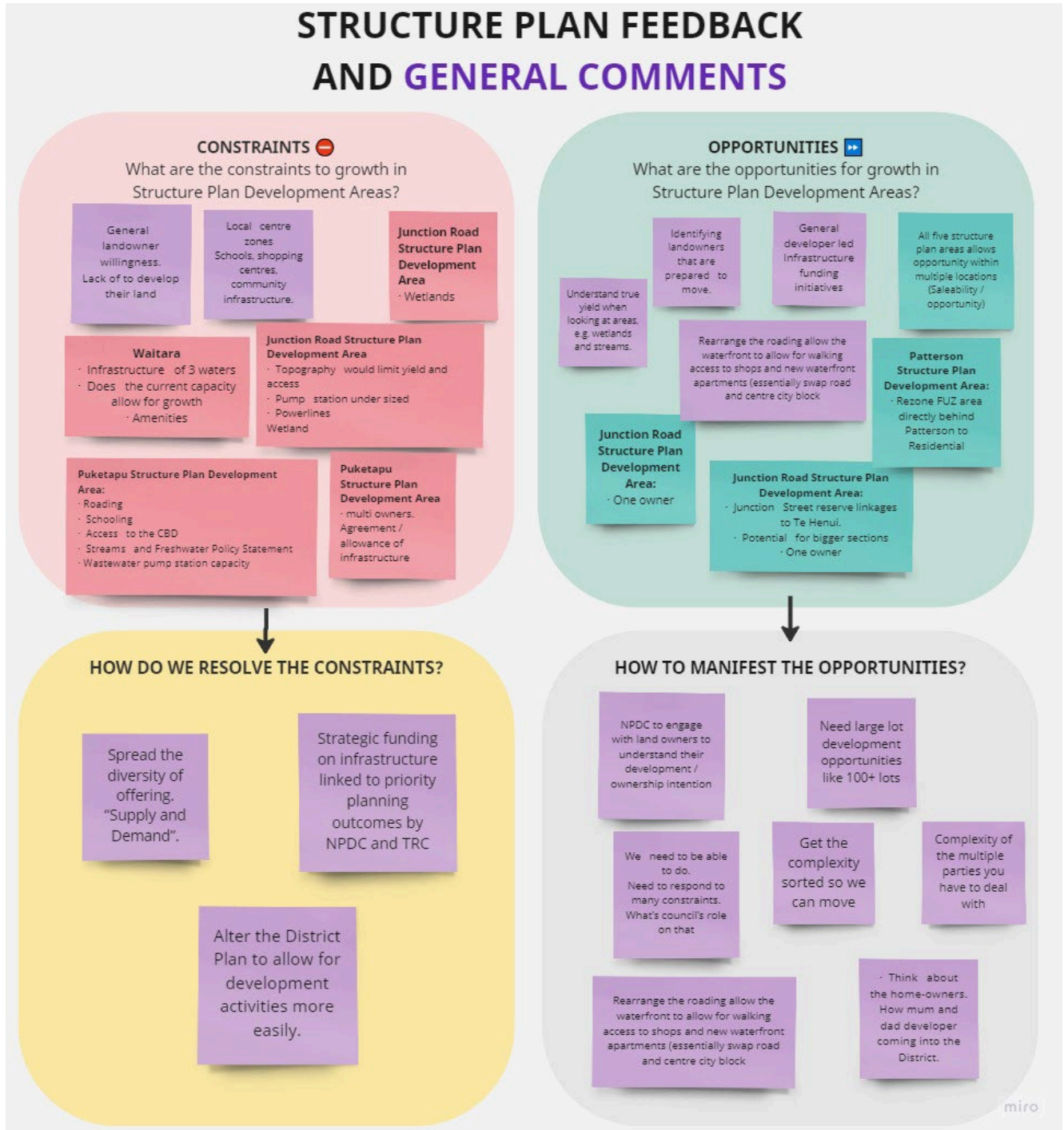


Figure 5: Structure Plan Feedback and General Comments



The following provides commentary on the key themes raised by members of the development and technical professionals sector.

Capacity

The development and technical professionals sector's views were mixed. In general, feedback indicated that this sector was supportive of the broad locations already identified for growth.

The group were generally of the view that additional areas of greenfield land should be provided in the short term as these would offer significant additional opportunity for development. Members of the group indicated that this would provide excess supply and in doing so, potentially lower residential land prices within the district. They have also indicated that this would build-in additional development capacity to provide for some flexibility as a means to allow for landowners who are not developing their properties.

A further common theme through feedback was that areas of land currently contained within the Future Urban Zone should be brought forward and form part of the district's short-term residential growth. In particular, feedback was received indicating that lower portions of Smart Road, Ōākura South and portions of Frankley/Cowling should be made available for development in the short-term.

In relation to Smart Road and Ōākura South in particular, it was raised that significant work was being undertaken by landowners in relation to how these areas might develop in a way that adds substantial capacity in a way that achieves well-functioning urban environments. Landowners within lower Smart Road have indicated that this FUZ area should be staged in a way that makes available the lower sections of this area earlier.

Constraints

The sector indicated that the constraints and impediments to development need to be understood and resolved early, so that development can occur. It was indicated that it was often the case that a piece of land may appear unrestricted and suitable for urban development (i.e. zoned and free of "restrictive" overlays), but that through consenting processes other matters can arise. This included having a clearer understanding of tangata whenua's relationship with areas proposed for growth.

Infrastructure

In relation to infrastructure, aside from specific discussions about discrete works to 'unlock' Structure Plan Development Areas, feedback received indicated that strategic funding of key infrastructure which is linked to priority planning outcomes should be considered. Portions of the group also suggested that co-funded infrastructure provision should be considered for larger scale projects.

Intensification

While large parts of the discussion focused on greenfield development, participants also raised the need to prioritise areas for master planning within urban spaces as a means to enable and encourage intensified land uses in a way that delivers well-functioning urban environments. Specifically, areas of Moturoa were identified, as was the area surrounding the Taranaki Base Hospital.

Relationships

Feedback from several parties indicated that the Councils need to better understand landowner intentions and prioritise areas with a known desire from landowners to develop and add sections/housing to the market.

Finally, a common theme across feedback was the necessity for an ongoing and positive working relationship between the Councils and the development and technical professionals sector.

4.2. Discussions with Other Parties

As noted above, the pre-draft documentation was also circulated to providers of additional infrastructure (Transpower, Powerco, First Gas, etc.) and other agencies and organisations with a particular interest in the matters addressed by the draft FDS (Kāinga Ora, Ministry of Education, New Zealand Transport Agency Waka Kotahi, etc.).

Feedback was not initially provided by any of these groups. NPDC reached out directly to Kāinga Ora, the Ministry of Education and Waka Kotahi and initial meetings were held, where some broad considerations were put forward by these parties.

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

- The New Zealand Transport Agency Waka Kotahi seek to maintain the efficiency of the state highway network, highlighting that long term development in Smart Road will require their input.
- Kāinga Ora are supportive of using Medium Density Zones and Centres to increase the number of smaller housing options in locations with established amenities. They are interested in housing affordability, healthy long-term rental options and the need to increase the proportion of accessible housing for disabled people and lower cost accommodation and social housing; and
- The Ministry of Education have advised that the district is supported by a network and variety of educational facilities and see benefit in upgrading existing assets as the population increases.

Engagement with these groups will be ongoing and are continuing, so that the Councils can understand their views as we progress the draft FDS.

4.3. Consideration of FDS Stakeholder Feedback

The feedback received from stakeholders was incorporated into the draft FDS in several ways:

- Scenario development and testing: Additional greenfield development opportunities were developed based on the boundary areas identified in the stakeholder workshop, as shown in the maps supplied for the Greenfield Focus Scenario 2 in Appendix 1.

- Constraints: Specific discussion on
 - natural hazards and identified features (e.g. SASM sites) and topography, and how they impact on development.
 - the infrastructure required for the PDP Future Urban Zone areas included within scenarios; and
- The development of evaluation criteria for scenarios which included the broad themes raised in stakeholder feedback, including both constraints and opportunities.

In addition to the above, an assessment was also undertaken on the potential areas for growth put forward by the development and technical professionals sector.

5. Key Inputs and Assumptions

5.1. Housing and Business Capacity Assessment 2024

The Councils Housing and Business Capacity Assessment (HBA) 2024 provides detailed forecasts for residential and business growth over the next 30 years.

The Councils use the following timeframes:

- Short term – within the next three years (2024-2027)
- Medium term – between three and ten years (2027-2034) and
- Long term – between 10- and 30 years (2034-2054).

Overall, the HBA indicates that the New Plymouth district has sufficient housing and business development capacity for the short term, the medium term, and the long term. Current levels of development capacity and proposed additional supply over time will meet the projected demand for housing and business development capacity throughout the district. The key trends and issues are as follows:

- Population Growth and Housing Demand - Anticipated growth in the New Plymouth district is projected at 9,800 people (8.3%) in the next decade, reaching approximately 98,800, and 110,400 over the next 30 years (by the end of 2054). To accommodate this growth, the district requires an additional 11,027 new dwellings over the next 30 years, translating to an average annual need of 368 dwellings per year.
- Residential House Prices and Affordability - Building or purchasing a first home in New Plymouth has become more expensive, leading to a decline in housing affordability.
- Short-Medium Term Capacity - Existing PDP residentially zoned land and identified infill housing potential will provide the necessary capacity to meet short-term demand. The introduction of Structure Plan Development Areas will enhance capacity to meet medium-term housing demands.
- Long-Term Growth Areas - Future Urban Zones identified in the PDP offer sufficient capacity to meet long-term housing demands in the district.
- Infrastructure for Future Growth - A significant portion of NPDC's infrastructure spending, identified in its draft 2024 LTP, over the next decade is dedicated to supporting future growth, with an estimated 19% of this expenditure to be recovered through development contributions.
- Demographic Changes and Housing Typologies - Shifting demographics, including an ageing population will drive demand for various housing typologies, particularly single-person and couple-only households. This includes an increase in demand for small and multi-unit dwellings, as well as facilities like rest homes and retirement villages.

- Feasibility of Development - Under the current market offer, greenfield development is typically more feasible than infill development, with greater economic feasibility for residential greenfield development compared to infill development.
- Business land needs are adequately addressed - Across the New Plymouth district, business floor space is well-provided. However, confirmation of actual market demand will necessitate continuous monitoring and a review of uptake in specific locations. A generous supply of business land is available for development within the Central City and its surrounding zones. The New Plymouth district exhibits ample capacity to satisfy commercial and retail demand, particularly through multi-level developments in the Central City area and surrounding mixed-use zones outlined in the PDP.
- There is adequate provision for industrial land on the eastern side of the City. - The eastern side of New Plymouth City has a sufficient supply of district plan-enabled land to cater to industrial demand in the long term.

5.2 Constraints on Development

Section 3.13(d)(c) of the NPS-UD requires that a future development strategy spatially identifies any constraints on development. The Future Development Strategies fact sheet¹⁴ 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.*”



To inform the draft FDS, data was collected from a range of sources to inform an understanding of development constraints and these were mapped across the district. Many constraints are indicated within the PDP and managed as overlays. The ‘Overlay Chapters’ include the Coastal Environment, and chapters in the Hazards and Risks, Historical and Cultural Values and Natural Environmental Values sections of the PDP. The overlays were partly informed by Regional Plans, and some constraints are based on known TRC data. Spatial data sources of the known constraints within the district are outlined below in Table 1.

The maps of the constraints based on the spatial layers set out in Table 1 are shown in Appendix 2.

Table 1: Summary of Spatial Data Used to Inform Development Constraints

Category	Context	Proposed New Plymouth District Plan – Appeals Version spatial layer	Taranaki Regional Council spatial layer
Highly Productive Land	Land zoned RPROZ in the PDP and identified as LUC1, LUC2 or LUC3 on the Land Use Capability classification in the New Zealand Land Resource Inventory	Rural Production Zone	Property Information (trc.govt.nz) Land Use Capability Classification (NZLRI) layer Note: more fine-grained mapping is expected to have been completed by

¹⁴ Ministry for the Environment, [Future Development Strategies](#), July 2020.

Category	Context	Proposed New Plymouth District Plan – Appeals Version spatial layer	Taranaki Regional Council spatial layer
	(Manaaki Whenua/ Landcare Research National Database)		TRC and included in the Regional Policy Statement by 2026.
Hazards and Risks 	Significant hazardous facilities Some sites have site specific risk management contours based on expert reports which have quantified the risk. Where no site-specific technical report has been provided to quantify risk from a particular significant hazardous facility, a 250m or 650m buffer is applied.	Risk management contour	
	Coastal Hazards The PDP includes three coastal management areas which address coastal hazards ¹⁵ .	Coastal Flooding Hazard Area	
		Coastal Erosion Hazard Area	
	Other flooding hazards	Flood Plain ¹⁶	
		Flood Detention Area/Spillway ¹⁷	
		Stormwater Flooding Area ¹⁸	
	Liquefaction ¹⁹	(outside the PDP)	Rivers

¹⁵ **Coastal Flooding Hazard Area** - Land identified by [Tonkin and Taylor \(2016\)](#) spatially identifies the modelled extent of land subject to inundation in an event with a one percent probability of being exceeded in any year (1% AEP) with an allowance for sea level rise to the year 2115. The sea level rise value is based on a scenario of increasing greenhouse gas emissions over time referred to as IPCC Representative Concentration Pathways (RCP) 8.5.

Coastal Erosion Hazard Area – Areas identified by [Tonkin and Taylor \(2019\)](#) that are considered to be at the highest risk of erosion over a 100 year timeframe, based on historic rates of sea level rise.

Coastal Environment – includes all flooding areas identified by [Tonkin and Taylor \(2016\)](#) and areas identified by [Tonkin and Taylor \(2019\)](#) that are considered to be potentially at risk of erosion over a 100 year timeframe, based on RCP8.5+.

A more detailed assessment at Onaero informs the Coastal Erosion Hazard Area and Coastal Environment, as identified by [Tonkin and Taylor \(2019\)](#).

¹⁶ **Flood Plain** - Any land likely to be covered by water in the event that the stop banks of the lower Waitara or lower Waiwhakaiho River flood control schemes are breached.

¹⁷ **Flood Detention Area/Spillway** - Land designated to contain floodwaters in the 1 per cent annual exceedance probability (100-year return) rainfall event.


¹⁸ **Stormwater Flooding Area (non-district plan layer, indicative only)** - Areas that typically experience surface floodwater ponding or overland flows in a one percent annual exceedance probability (100-year return) rainfall event.

¹⁹ NP District Liquefaction Vulnerability Assessment, [Tonkin and Taylor, \(October 2021\)](#)

Category	Context	Proposed New Plymouth District Plan – Appeals Version spatial layer	Taranaki Regional Council spatial layer
		Liquefaction Vulnerability Assessment (arcgis.com)	
	Earthquake	Fault Hazard Area ²⁰	
	Volcanic hazard	Volcanic Hazard Area ²¹	
Scheduled Features and Protected Land 	Coastal Environment	Coastal Environment Outstanding Natural Character	
	Outstanding Natural Features and Landscapes	Outstanding Natural Feature and Landscape	
	Wetlands		Biodiversity (trc.govt.nz) Ecosystem Mapping: Scheduled Wetlands TRC FWP 2001
	Rivers	Rivers layers	
	Significant Natural Areas	SNA	
	Notable Trees	Notable tree	
	Conservation Land		Biodiversity (trc.govt.nz) Biodiversity maps/Protected Areas
	QEII land		Biodiversity (trc.govt.nz) Biodiversity maps/Protected Areas
	Sites and Areas of Significance to Māori	SASM sites	
	Archaeological sites	AS sites	
	Heritage buildings, items and character areas	City Centre Heritage Character Area Heritage Buildings	
Infrastructure 	Airport	Noise Control Boundary	
	Gas Transmission	Gas Transmission Pipeline	
		Gas Transmission Station Corridor	
	National Grid	National Grid Subdivision	
		National Grid Substation	
		National Grid	
	Designations	Designations (includes all roads, and the Railway Corridor).	

²⁰ **Fault Hazard Area** - a fracture in the earth's crust resulting in relative displacement of the ground either side. In the New Plymouth District this area includes land which is 20m either side of the Inglewood and Norfolk faults.



²¹ **Volcanic Hazard Area** - land at high risk of lahars and flooding associated with a volcanic event.




Category	Context	Proposed New Plymouth District Plan – Appeals Version spatial layer	Taranaki Regional Council spatial layer
	Hospital	Special Purpose – Hospital Zones	
Reverse Sensitivity 	Poultry farms		TRC Resource Consents . Avoid establishment of residential units within 400m
	Existing indoor pig farms		TRC Resource Consents . Avoid establishment of residential units within 400m
	Mineral extraction activity		TRC Resource Consents . Avoid establishment of residential units within 500m

Gaps in Spatial Layers

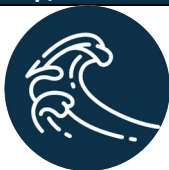



It is recognised that data is not available or complete for all constraints on development. A summary of key data gaps or issues is set out below in Table 2.

Table 2: Summary of Data Gaps or Issues

Gap/Issue	Comments
Highly productive land 	<p>Under the NPS-HPL, TRC have until September 2025 to map highly productive land and show these maps in a Proposed Regional Policy Statement. Until this work is completed, a transitional definition for 'highly productive land' applies, based on land identified as LUC (Land Use Capability) class 1, 2, or 3 in the New Zealand Land Resource Inventory (NZLRI) database and the rural production zoning of land in the PDP.</p> <p>It is anticipated that when the FDS is reviewed in three years' time, the subsequent FDS will incorporate revised mapping of highly productive land, provided by TRC.</p>
River flooding and erosion 	<p>Identified Flood Plain Areas in the PDP are limited to those rivers where flood control schemes exist (Waitara and Waiwhakaiho Rivers).</p> <p>Stormwater Flooding Areas are shown in proximity to rivers, in those catchments where modelling has been undertaken.</p> <p>The Coastal Flooding Hazard Area mapping is concentrated around river mouths, extending upstream. This spatial dataset is not complete for the district as inundation was only mapped for areas with available topographic data at the time (Oākura to Waitara, and Onaero and Urenui).</p> <p>However, while some of the PDP flooding hazards are located around rivers, there is no specific district-wide information available about the location of riverbank flooding and erosion.</p> <p>NPDC is planning to undertake modelling of the main rivers that pass through New Plymouth, as part of the stormwater modelling program. The aim is to generate maps that can be used to determine hazard areas and inform erosion and setback zones. Until this work has been completed, blanket setbacks for earthworks and the erection of</p>

Gap/Issue	Comments
	buildings from the banks of rivers and streams are included in the Waterbodies Chapter of the PDP.
Stormwater flooding and ponding 	<p>Stormwater flooding is a widespread natural hazard in the district. Ponding areas in the Operative District Plan were based on known historical flooding, did not incorporate increased ponding projected under climate change scenarios and did not include overland flowpaths. A non-statutory indicative layer called the Stormwater Flooding Area is included in the PDP. The modelling which informs this layer includes climate change projections and identifies areas where surface floodwater ponding and/or overland flows are expected in a one percent Annual Exceedance Probability (AEP) rainfall event (100 year return). However, the modelling has not yet been completed across the whole district.</p> <p>The improved modelling is part of a significant NPDC project. The modelling has been completed for Waitara, Fitzroy, and New Plymouth Central catchments, and modelling of the remaining urban catchments is expected to take ten years, to be completed by approximately 2035. The layer is indicative only and is subject to change as NPDC undertakes catchment modelling and improvements. Once the modelling has been rolled out and completed for the district, the hazard will not remain static because development changes the permeability of land, we live with the effects of climate change on hazards as they develop over time, and NPDC responds with stormwater fixes. For these reasons, the PDP includes the Stormwater Flooding Area as an <i>indicative</i> layer. A site-specific engineering assessment is generally required to understand stormwater flooding and overland flowpaths for land development.</p>
Wetlands 	<p>Under the National Policy Statement for Freshwater Management 2020 TRC have 10 years to map all inland wetlands (to be completed by September 2030). While some wetlands are mapped for the district, such as those listed in Appendix 2A, 2B and 3 of the Regional Fresh Water Plan for Taranaki (2001), the existing spatial data is considered outdated, incomplete and inappropriate to use in the draft FDS. Through the NPS-FM regional councils are required to map all inland wetlands over a 10 year period. This work is currently being undertaken by TRC.</p> <p>Setbacks from inland wetlands are regulated by the National Environmental Standards for Freshwater, administered by TRC.</p>
Liquefaction 	<p>A GNS 2013 study found that due in part to the region's geology, the low earthquake risk, and the limited number of coastal areas with soil types that might liquefy, the risk of liquefaction in the District is low and restricted to a few locations such as Port Taranaki, Tongaporutu, Waitara, Onaero and Urenui. Areas susceptible to liquefaction are not identified in the PDP but are considered under building consents. To inform this, a Liquefaction Vulnerability Assessment was undertaken by Tonkin and Taylor (2021). This categorises the land within the district into one of three categories:</p> <ul style="list-style-type: none"> • Liquefaction Damage is Possible • Liquefaction Damage is Unlikely, and • Liquefaction Category is Undetermined. <p>The areas are shown on a NPDC public viewer, but not at a property scale (1:25,000). This risk requires more detailed analysis when a site is developed.</p>
Tsunami Mapping	<p>The New Plymouth District is at low risk of susceptibility to tsunami due to the physical nature of the coastline which is predominately steep cliffs. According to a 2012 report²², "there are many areas along the Taranaki Coast that would only suffer very localised threat and minor damage from even the largest plausible tsunami." However the 2012 report did conclude that low lying communities including Tongaporutu, Urenui, Onaero and river mouths in Waitara, Bell Block, Fitzroy and Oākura are at some risk of a tsunami.</p>

²² Goodier, C. (2012, updated 2017) 'Taranaki Tsunami Inundation Analysis'; Hawke's Bay Regional Council

Gap/Issue	Comments
	<p>The 2012 report was commissioned for CDEM purposes and while some mapping is available, further modelling would be required to quantify this risk to a level which is necessary to determine land use controls at the individual property level.</p> <p>Tsunami evacuation zones are shown on the CDEM website.</p>
Landslides 	<p>While some data exists identifying landslides in the district, such as the GNS Science Landslide Database, the accuracy of locations and information varies. There has been no district-wide study identifying landslide areas. There are no spatial layers for landslides, and the district plan manages this natural hazard using slope as a proxy. Land instability has not been mapped for the district but all subdivisions need to demonstrate ground conditions provide for suitable building platforms.</p>
Contaminated Land 	<p>The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 ('NESC') is a nationally consistent set of planning controls and soil contaminant values. It ensures that land affected by contaminants in soil is appropriately identified and assessed before it is developed, and if necessary, the land is remediated, or the contaminants contained to make the land safe for human use.</p> <p>Land which has had, or is more likely than not to have had, hazardous activities or industries undertaken on it, may be contaminated. Under the NESC such land is considered 'HAIL' (included in the current edition of the <i>Hazardous Activities and Industries List</i> issued by the Ministry for the Environment).</p> <p>TRC holds a database of HAIL sites as identified on the Register of Selected Land Use ('RSLU'). This is publicly available on the TRC website: Property Information (trc.govt.nz). However, this information is currently being reassessed as a long-term project, under revised HAIL guidelines, and is not considered complete or accurate. Therefore, it is inappropriate to include the spatial data in the draft FDS.</p> <p>The majority of HAIL sites of actual concern are believed to be within land already zoned commercial or industrial (less relevant to the draft FDS focus areas) and therefore unlikely to pose serious constraints to development.</p> <p>Furthermore, potentially contaminated land is able to be developed providing it is safe for human use, subject to the processes set out in the NESC.</p>
Coastal flooding 	<p>The Tonkin and Taylor coastal inundation assessment was finalised in 2016, prior to the MfE guidance being released. Modelling was based on both present day and future sea levels at 2065 (50 years) and 2115 (100 years) timeframes based on a range of sea level rise scenarios, extrapolating from past rates of sea level and including various IPCC future emission scenarios. The assessment did not extend the full 100km length of the district's coastline, being limited to the areas with available topographical data (Oākura to Waitara, and Onaero and Urenui). Therefore, northern settlements on low lying river mouths such as Tongaporutu and Mohakatino which may be prone to coastal flooding are not included in the analysis and may warrant further study in the future. It is considered likely that these areas not included in the Tonkin and Taylor study are captured within the broader Coastal Environment mapped in the PDP.</p>

5.3. Infrastructure Planning

Clearly understanding and planning the timing of delivery for key infrastructure projects to support urban growth is also essential. The lead in times relating to investigation, design and delivery for these pieces of work all require considerable time. It is also not financially viable to deliver these projects at one time. As such, the Councils need to carefully consider how and when to fund and deliver infrastructure to enable growth and development in a cost-effective and efficient way. One of the key drivers of the draft FDS, as reflected in the purpose, is to integrate planning decisions with infrastructure planning and funding.

Strategic documents like NPDC's Long Term Plan, Infrastructure Strategy and draft Integrated Transport Framework help in this planning and decision making and have been considered in preparing the draft FDS. Taking stock of NPDC's infrastructure planning has been critical to ensuring the overall growth strategy makes the most efficient use of existing and committed infrastructure.

Of particular concern with regard to flood protection infrastructure is the the flood protection scheme associated with the Mangaone Stream. This is currently operating at its maximum capacity for river flooding. Therefore, any new development in Smart Road will require further investigations and planning to ensure the flood protection provided by the Mangaone scheme continues to be effective. This will be addressed as part of TRC future infrastructure investigations.

Section 3.13(2)(b) of the NPS-UD requires every future development strategy to spatially identify "The development infrastructure and additional infrastructure required to support or service that development capacity, along with the general location of the corridors and other sites required to provide it."

The consideration of infrastructure for the draft FDS is focused on roading and 'three waters' being water (potable), wastewater and stormwater. This includes the provision of the current status quo, understanding supply, source, storage and capacity within the relevant networks of the core development infrastructure to meet and support development capacity in the draft FDS. Consultation is ongoing with providers of other 'relevant infrastructure' such as, transport (including roading and multi modal) telecommunications, electricity, and natural gas supply.

This section discusses infrastructure issues and solutions and has been divided into three parts: Infrastructure for Structure Plan Development Areas, Infrastructure for Future Urban Zones and General Infrastructure Considerations Across the District for Business and Residential, identified through NPDC's Modelling Work.

5.3.1 Infrastructure for Structure Plan Development Areas

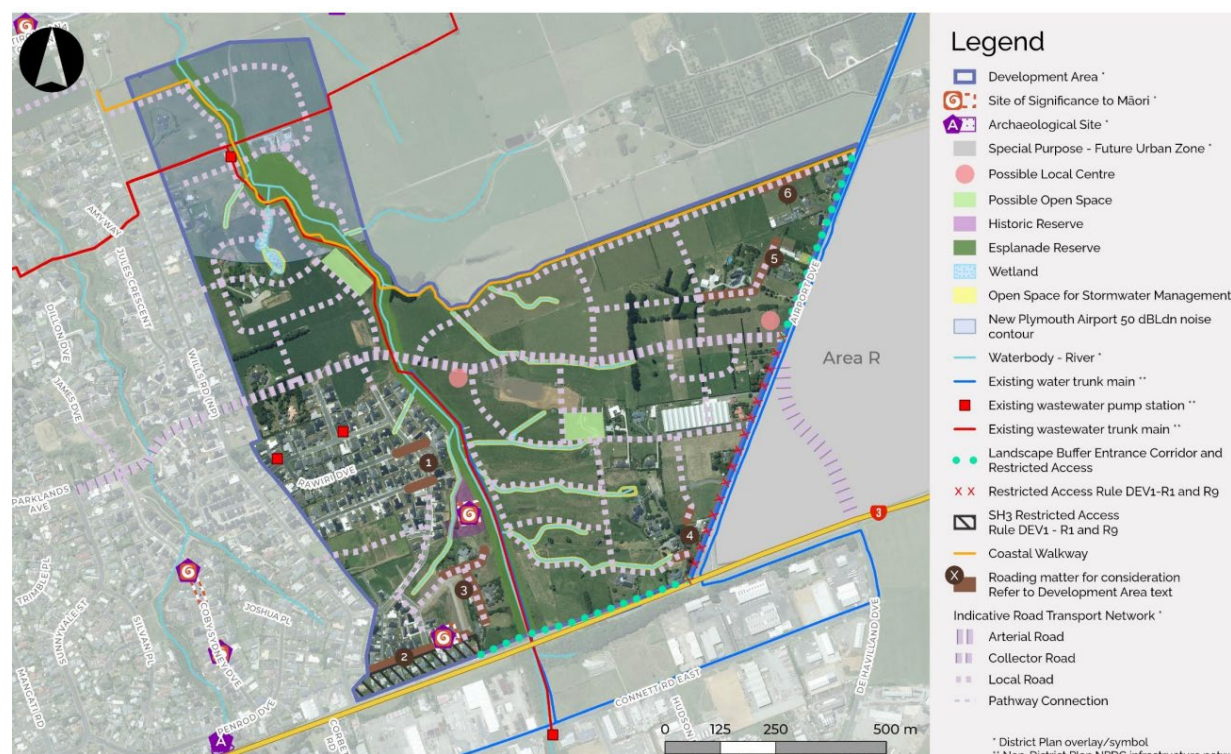
There are five Structure Plan Development Areas identified in the draft FDS. These areas will provide the district with sufficient development capacity to meet housing demand in the short-medium term (within the next ten years). Structure plans have been developed for each development area which spatially identify the infrastructure required to support or service development capacity, including the general location of the corridors and other sites required for infrastructure. The draft FDS Implementation Plan shows the infrastructure projects, timings and whether the funding is identified in the 2024 LTP, or developer led.

Puketapu Structure Plan Development Area (previously known as Area Q)

This area was originally rezoned in 2015, with new residential properties now built on some areas close to the existing residential on Wills Road. However, further development of this area has stalled due to infrastructure issues requiring coordination across multiple landowners. Figure 6 below shows the main infrastructure projects required.

To facilitate a comprehensive and highly effective infrastructure baseline to support the remaining development within the Puketapu Structure Plan Development Area, a NPDC-led and up-front funded initiative (partially recovered via development contributions) has been adopted and funding built into the draft 2024 LTP to facilitate the remaining infrastructure projects required to allow development of this area. This approach will unlock 75ha for development and approximately 670 properties. As part of this approach a review of the infrastructure required to service the area was undertaken. The review identified that a bridge was required to ensure the road avoids the now identified wetlands²³ in the Puketapu Structure Plan Development Area. These findings have been reflected in the draft 2024 LTP.

Figure 6: Map showing the Puketapu Structure Plan Development Area



²³ The wetlands were identified and mapped through the PDP hearing process.

Johnston Structure Plan Development Area

Figure 7 below map shows the infrastructure required to develop the Johnston Structure Plan Development Area. A new sewer main and road upgrading is the infrastructure that is required for this Structure Plan Development Area.

Figure 7: Map showing the Johnston Structure Plan Development Area



Carrington Structure Plan Development Area

Figure 8 shows the Carrington Structure Plan Development Area. The infrastructure projects which are required to service this area include:

- Upgrading of the Huatoki Valley Sewer Main
- Upper Carrington Road widening
- Construction of stormwater ponds
- New water pump and pipes.

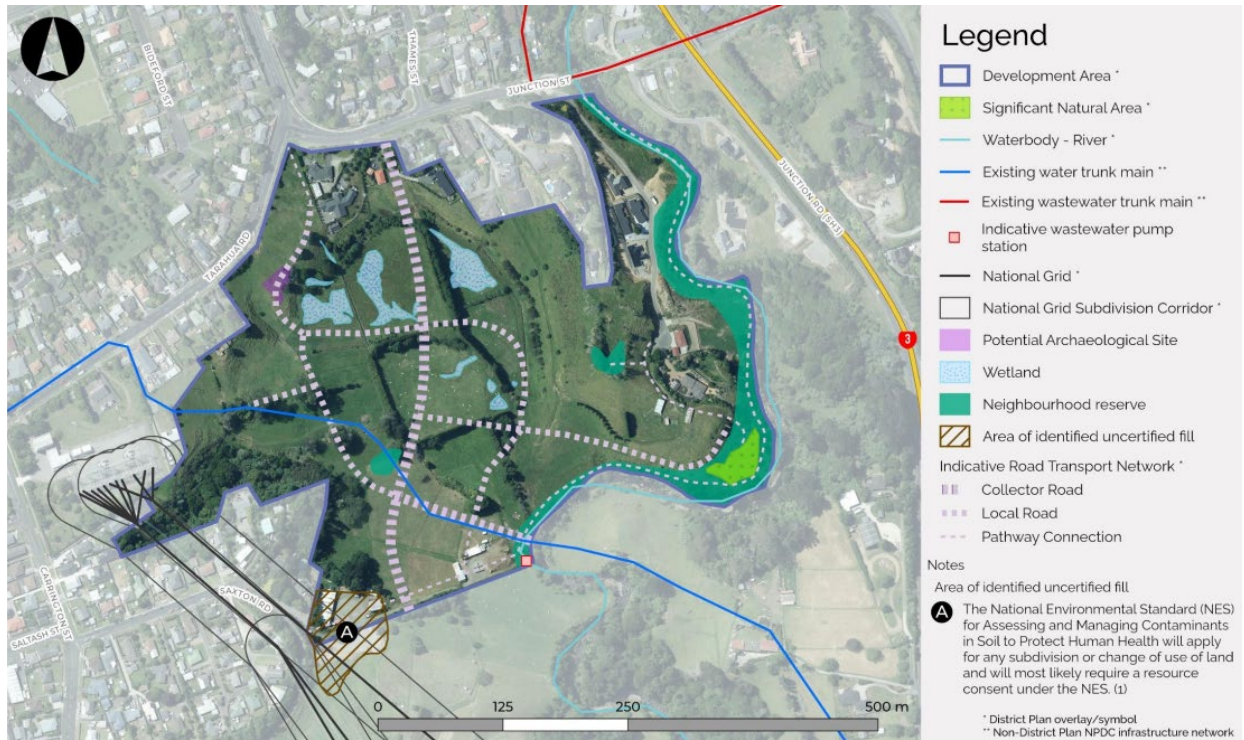
Figure 8: Map showing the Carrington Structure Plan Development Area



Junction Structure Plan Development Area

Figure 9 below spatially identifies the development infrastructure and additional infrastructure required to support or service development capacity, including the general location of the corridors and other sites required for infrastructure.

Figure 9: Map showing the Junction Structure Plan Development Area



The infrastructure projects which are required to service this area include:

- Upgrade to Thames Street sewer and construction of new sewer pump station and further downstream sewer upgrades
- Construction of stormwater ponds and
- Transport – Upgrade to Junction Street Bridge and seal widening.

Patterson Structure Plan Development Area

Figure 10 below shows the infrastructure projects required within Patterson Structure Plan Development Area.

Figure 10: Map showing the Patterson Structure Plan Development Area



To enable funding for infrastructure required between where infrastructure stopped at the existing urban boundary and the boundary of the Patterson Structure Plan Development Area NPDC applied and was successful in receiving funding through the Kāinga Ora Infrastructure Acceleration Fund for the Patterson Structure Plan Development Area. Table 3 below outlines the transport and three waters infrastructure projects which are funded via the Acceleration Fund.

Table 3: Infrastructure Acceleration Funding for DEV5-Patterson Structure Plan Development Area

Enabling Infrastructure Project(s)	Description
Transport Enabling Infrastructure Project(s)	<ul style="list-style-type: none"> Frankley Road Shared Pathway Frankley Road Tukapa Street Intersection Upgrades Patterson Road Seal Widening Patterson Road extension Cycleway and Walkway over Sutherland Sewer
Three Waters Enabling Infrastructure Project(s)	<ul style="list-style-type: none"> Sutherland Sewer Veale Road Pump Station Upgrade and Patterson Road Water Main

5.3.2 Infrastructure for Future Urban Zones

The Future Urban Zones in the PDP are required for long term (10-30 years) land supply for Residential and Industrial supply. Due to these being earmarked for long term supply the finer grain infrastructure assessments have yet to be undertaken. However, initial identification of infrastructure requirements for each Future Urban Zone has been identified and are discussed below.

Junction Stage 2 Future Urban Zone

The Junction Stage 2 Future Urban Zone, as shown in Figure 11 below, requires sewer investigation work, including a potential new sewer pump station, and further investigation work for all stormwater and water supply.

Figure 11: Map showing the location of the Junction Stage 2 Future Urban Zone



Frankley/Cowling Future Urban Zone

The Frankley/Cowling Future Urban Zone, as shown in Figure 12 below, requires a number of roading and three waters infrastructure projects. Two of the larger projects include the Waimea Sewer extension and the Cowling Road widening.

Figure 12: Map showing the location of the Frankley/Cowling Future Urban Zone



Area R Future Urban Zone

The Area R Future Urban Zone, as shown in Figure 13 below, will benefit from the infrastructure investments being undertaken for Puketapu Structure Plan Development Area, as the development of Area R cannot connect into the 3 waters infrastructure until these projected are completed. The big project for Area R is the realignment of Airport Drive/round-about which is a joint New Zealand Transport Agency Waka Kotahi and NPDC project. The design phase of this project is currently underway, with the realignment roading work due to start in 2026/27.

Figure 13: Map showing the location of the Area R Future Urban Zone

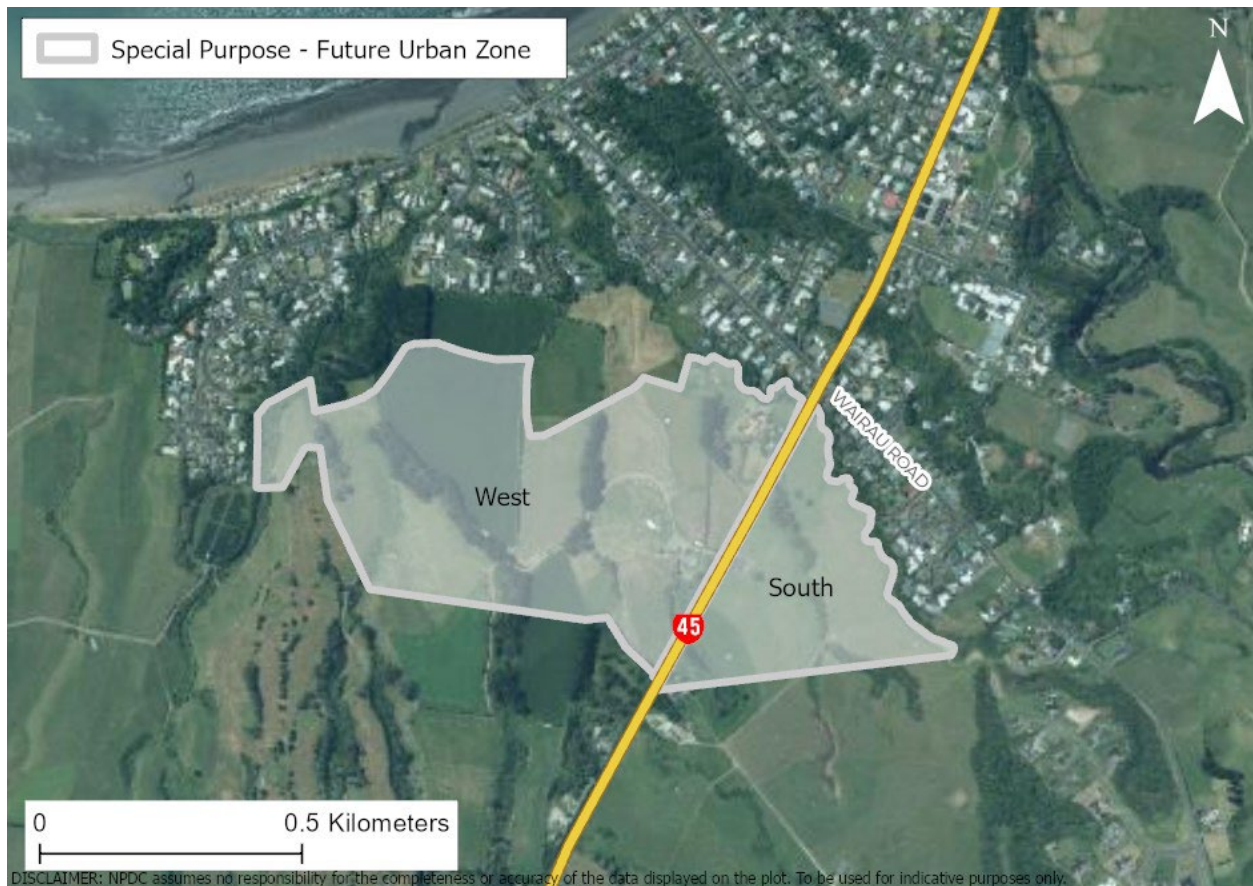


Oākura Future Urban Zones

There are two Future Urban Zones in Oākura: Oākura South and Oākura West as shown on Figure 14 below. There are several roading and water supply infrastructure projects required for these areas including:

- Wairau/South Road roundabout
- SH45 Wairau Road underpass and
- New water supply main.

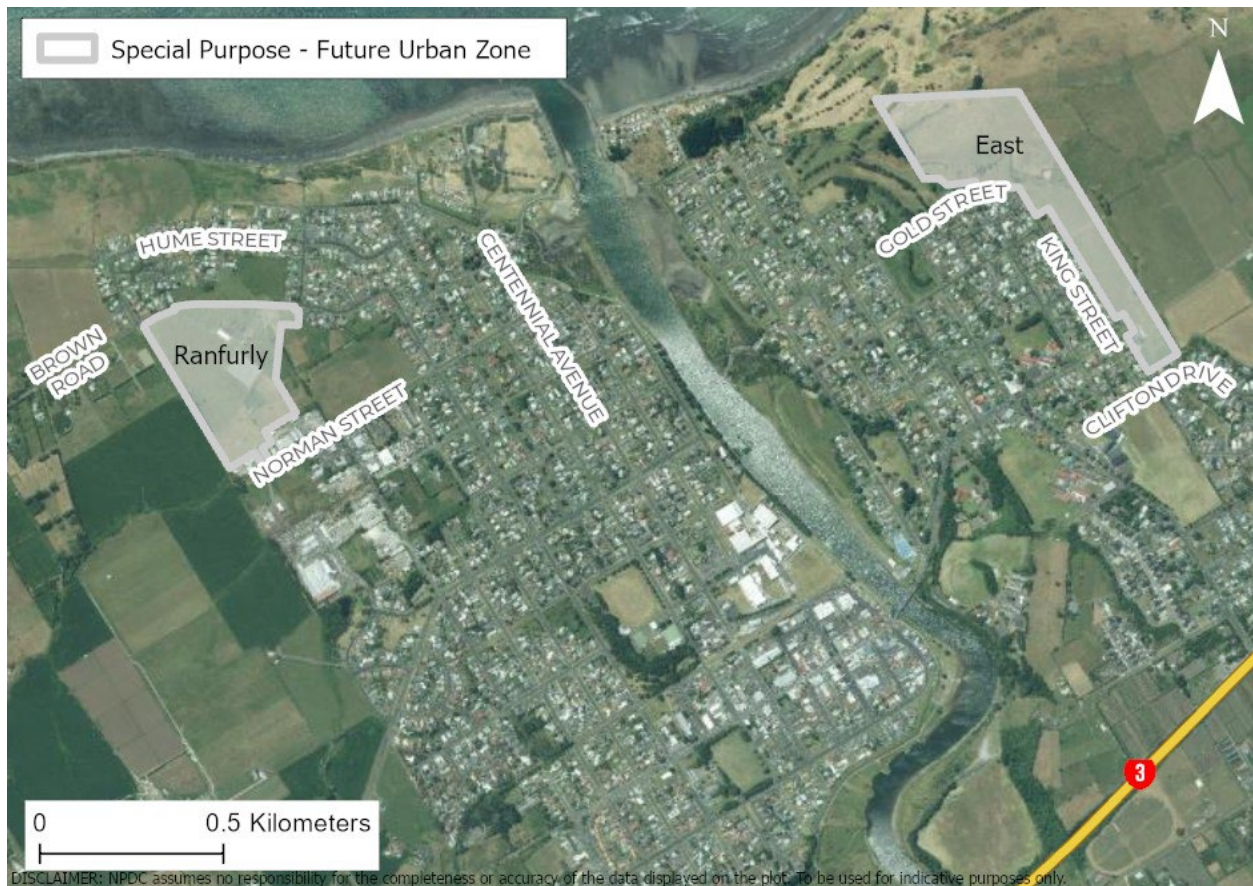
Figure 14: Map showing the location of the Oākura Future Urban Zones



Waitara Future Urban Zones

There are two Future Urban Zones in Waitara: Waitara East and Ranfurly, as shown on Figure 15 below. There are several large infrastructure projects required for the Waitara Future Urban Zone, including stormwater upgrades, work to prevent wastewater overflows, and the Waitara Wastewater transfer upgrade.

Figure 15: Map showing the location of the Waitara Future Urban Zone



Smart Road Future Urban Zone

The Smart Road Future Urban Zone, as shown on Figure 16 below, requires numerous infrastructure projects. The following projects have been identified:

- Transport infrastructure:
 - Waiwhakaiho River bridge second crossing
 - Roothing extensions to Waiwhakaiho Road, Smart Road, Bishop Road and Katere Road
 - Road widening for Smart Road, Egmont Road and Henwood Road and
 - Smart Road intersection upgrade.
- Water supply:
 - Smart Road trunk main and
 - Smart Road reservoir.
- Stormwater:
 - Investigate the impact of development on Mangaone Stream.
- Wastewater:
 - Smart Road growth sewer.

Figure 16: Map showing the location of the Smart Road Future Urban Zone



Oropuriri Future Urban Zone

Oropuriri Future Urban Zone, as shown in Figure 17 below, will be rezoned to General Industrial Zone when required for capacity. There are numerous infrastructure issues that may need to be worked through to develop solutions. These potentially include a new wastewater pump station and sewer connection, a possible water supply upgrade along Egmont Road and upgrades to the stormwater network.

Figure 17: Map showing the location of the Oropuriri Future Urban Zone



5.3.3 General Infrastructure Considerations Across the District for Business and Residential, identified through NPDC's Modelling Work

The following section provides an overview of recent modelling undertaken in relation to NPDC administered sewer network and outlines key issues in relation to these pieces of infrastructure as they relate to specific townships and suburbs.

It is acknowledged that New Plymouth is facing major issues with basic infrastructure assets, particularly water infrastructure (water supply, wastewater, storm water). The focus of the next ten years is to address

the issues with existing infrastructure, whilst providing infrastructure for the required growth the district is expected to experience.

A network model has been developed for the district to understand existing issues and assist in identifying solutions in relation to three waters.

Sewer modelling work on the older sewer networks in Waitara and Inglewood have significant areas which surcharge in rain events with a 1-in-2 year Average Return Interval. This leads to overflows. In Inglewood, practically any additional development will increase in the risk of overflows from the network. In Waitara, there are areas where further development may not increase the risk of overflows.

The Inglewood wastewater network is experiencing overflows of sewage to the environment multiple times per year and in residential areas during heavy rain events. The cause of this is a combination of high levels of Inflow and Infiltration (I&I), a lack of pipe capacity and a poor network layout. The solutions will involve a range of interventions to attempt to reduce the frequency of these overflows occurring. This includes a range of existing pipe upgrades, new pipes and diversions, and an I&I reduction project across Inglewood.

The Waitara wastewater network is experiencing overflows of sewage to the environment multiple times per year, and in residential areas during heavy rain events. The cause of this is a combination of high levels of I&I, a lack of pipe capacity and a poor network layout. This program will involve a range of interventions to attempt to reduce the frequency of these overflows occurring. This includes a combination of existing pipe upgrades, new pipes and diversions, pump station upgrades, and an I&I reduction project across Waitara. A high level of engagement with iwi/hapu and the community will need to occur throughout this project.

5.4 Development of Outcomes

A series of outcomes have been developed to guide the direction of the draft FDS, inform the assessment of broad spatial scenarios and provide a framework for our implementation of the strategy.

The outcomes have been developed to give effect to higher order documents, such as the NPS-UD, NPS-HPL and Part 2 of the RMA, but have also been prepared with particular consideration of the strategic direction for urban form and development contained within the PDP.

The outcomes are aspirational statements which need to be considered as a whole. The outcomes will at times compete and appear contradictory and trade-offs will need to be made to achieve them as a package.

6. Spatial Scenarios

To assist in the assessment of how and where New Plymouth should grow, several broad options, or spatial scenarios, for how the district could accommodate a projected population increase were identified and considered.

The NPS-UD requires that the advantages and disadvantages of different spatial scenarios are evaluated as part of preparing a future development strategy. The NPS-UD does not specify what a spatial scenario is. In preparing the draft FDS, spatial scenarios have been used as a means to understand and inform the spatial distribution of growth and to assist in understanding the trade-offs of differing growth scenarios, as well as how identified areas could contribute to the identified outcomes and meeting housing capacity requirements over the next 30 years.

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

The draft FDS contains detailed assessments of how residential scenarios were considered including an assessment of the advantages and disadvantages of the scenarios. The following section will not duplicate this but will outline how the scenarios were developed and provide any supporting background information, detail in relation to methodology and maps.

The scenario development and assessment has been undertaken by considering several broad scenarios for how the district might provide for growth. Several of these were ultimately discounted early in the process based on flaws. The broad advantages and disadvantages of the scenarios were then considered.

6.1. Spatial Scenarios Discounted

As noted, several scenarios were initially considered but were subsequently discounted due to flaws with the concepts which meant it was not considered worthwhile progressing the options to more detailed analysis. This are outlined as follows:

Spatial Scenario: Further Intensification of Existing Medium Density Residential Zoning

Under this scenario land zoned in the PDP as Medium Density Residential Zone would be intensified by increasing the number of dwellings allowed on a site from three to four or by reducing the minimum lot size from 300m² to 200m².

As part of the District Plan Review and PDP process, property market and economic analysis was provided by Property Economics, a consultancy firm based in Auckland.²⁴ When considering residential rezoning matters the economic position taken was that increasing the number of dwellings from three to four and reducing the lot size from 300m² to 200m² would not make any marked difference on modelled capacity.

²⁴ [New Plymouth Feasible Capacity Assessment Updates](#), Property Economics, July 2022.

Given this, we discounted this scenario as it does not appear to result in a materially different result than if these areas were to remain with their currently allowed intensification rates.

Spatial Scenario: Rezoning Rural Lifestyle Zone to General Residential Zone

Under this scenario land zoned as Rural Lifestyle Zone in the PDP would be proposed for rezoning as General Residential Zone. The existing bulk and location provisions in the General Residential Zone would apply.

The Operative District Plan 2005 has one rural zone, the Rural Environment Area. There are no rural lifestyle environment areas. A Rural Lifestyle Zone was included in the Proposed District Plan when it was notified in 2019. Prior to this, the district's rural areas came under increasing pressure and demand to accommodate rural lifestyle living. The last decade has seen an increase in rural lifestyle subdivision and development primarily in locations close to urban centres, and on the coast and elevated areas around Mount Taranaki where expansive coastal and city views can be enjoyed.

Rezoning all existing Rural Lifestyle Zone areas to General Residential Zone is unlikely to be well received by those in the community who desire rural lifestyle living as an option. Subdivision trends indicate that there is a demand for rural lifestyle living. In addition, if legitimate district plan options for this way of living are removed it is possible that ad hoc lifestyle developments may arise. This could create fragmentation of rural land, increased potential for reverse sensitivity effects, negative impacts on rural production activities and changes to the character of the rural environment, including urbanisation. It is important to ensure that rural lifestyle development is located on land suitable for rural lifestyle living.

Spatial Scenario: Rural Intensification

This scenario would upzone some land in rural townships (Okato, Omata, Egmont Village, Lepperton, Urenui, Onaero and Tongaporutu) from Low Density Residential Zone to General Residential Zone. The existing bulk and location provisions in the General Residential Zone would apply.

It would enable a second house to be built in addition to an existing residential house or for two houses to be built on an empty section. However, site coverage effects standards would mean that buildings cannot cover more than 40 percent of the site.

Compared to the Low Density Residential Zone effects standards which are shown in the brackets below, the General Residential Zone provides for the following without a resource consent:

- 2 residential units per site (1 in LRZ)
- 40% maximum building coverage (35% in LRZ) and
- 400m² minimum lot size (750m² in LRZ).

This scenario was discounted as all these rural townships are on septic tanks. Advice from NPDC infrastructure staff concluded that a stand-alone wastewater treatment plant is needed for each community before intensification down to a 400m² minimum lot size is technically feasible.

Spatial Scenario: Dispersed

Under this scenario it would be up to developers to promote private plan changes in geographical locations based on where landowners are willing to rezone their land as residential, likely the General Residential Zone or the Medium Density Residential Zone. It would be up to the market where residential development occurs. The existing bulk and location provisions in the respective residential zone would apply.

This scenario would be inconsistent with NPDC's wider planning for the district and could result in fragmented and adverse environmental outcomes. This scenario would present challenges in terms of the provision of affordable and equitable infrastructure. In addition, the Councils would not be meeting its obligations under the NPS-UD because it would not be providing well-functioning urban environments.

6.2. Spatial Scenarios Considered

After the consideration and early discounting of the above options, the three scenarios that were progressed for more detailed assessment included an "urban intensification", a "greenfield" and a "balanced" focused approach to providing for urban development.

These scenarios were considered to be the most appropriate way of testing alternative approaches to providing for growth in the district. They broadly allow for the consideration and testing of key concepts which have recently been put forward by varying parties through the development of the proposed district plan, as well as pre-engagement on the draft FDS. In particular, they provide for consideration of the competing priorities of higher order policy direction.

The identification of the detailed geographical areas comprised within the scenarios were developed by way of:

- In relation to the greenfield scenario and possible additions to the balanced scenario, nomination from the development and technical professionals sector as sites being suitable for greenfield development and
- In relation to the intensification scenario and possible additions to the balanced scenario, consideration of submissions to the PDP and in particular, further consideration of the original submission of Kāinga Ora and their request to rezone large geographic areas, across the district to Medium Density Zoning.

There are commonalities between the spatial scenarios considered. These include:

- A provision for a broad variety of housing types that can enable different price points and tenures. All scenarios have assumed at a minimum that housing capacity targets will be delivered through some form of intensification and greenfield expansion. What varies between each of the scenarios is the scale, location and extent of housing types assumed.
- Projected business demand can be catered for in the existing zoned commercial/industrial areas and
- The existing structure plan development areas contained within the PDP are consistent across each scenario and it is assumed that these areas will be developed over the short to long term.

Spatial Scenario 1: Urban Intensification Focus

This scenario considers providing for a large portion of future residential development through the intensification of existing urban areas. It would remove all reliance on the existing Future Urban Zones currently present in the PDP.

This scenario would adopt the intensification established through the PDP-AV, but in addition would upzone additional land in New Plymouth, Bell Block and Waitara from General Residential Zone to Medium Density Residential Zone. The boundaries of the areas beyond those already zoned for medium density that have been assessed as a part of this scenario are shown in the maps supplied for the Urban Intensification Focus scenario in Appendix 1.

The existing bulk and location provisions in the Medium Density Residential Zone would apply.

It would intensify residential land via infill (where the existing house is retained and an extra dwelling/s is added) or comprehensive development (where the existing house is removed and the entire site is redeveloped). Up to three houses could be located on a residential site.

Compared to the General Residential Zone requirements which are shown in the brackets below, the Medium Density Residential Zone provides for the following without resource consent:

- 3 residential units per site (2 in GRZ)
- 11m maximum building height (8m in GRZ)
- 50% maximum building coverage (40% in GRZ) and
- 300m² minimum lot size (400m² in GRZ).

The additional areas of medium density land that make up this scenario total 617.8 ha that is currently zoned General Residential Zone.

Spatial Scenario 2: Greenfield Focus

This scenario would reduce the amount of land identified as Medium Density Residential Zone and instead provide significant portions of the district's residential growth within the residentially zoned PDP Structure Plan Development Areas and the Future Urban Zones. Spatial Scenario 2 would increase the amount of residential land in the district by rezoning land from Rural Production Zone to General Residential Zone. The existing bulk and location provisions in the General Residential Zone would apply.

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

The areas that make up additional areas for growth associated with this scenario total 936.6 ha of land that is currently zoned Rural Production Zone in Carrington North, Carrington South, Bell Block North, Bell Block South, Inglewood South West, Inglewood South East, Waitara West, Waitara South West, Waitara South East, Lepperton South West, Lepperton South East and Urenui West.

The additional areas comprised within this scenario were chosen because these areas were suggested for residential growth by members of the development and technical professionals sector at the information sharing and workshop session held on 5th December 2023.

The boundaries of the areas that were identified as part of this scenario are shown in the maps supplied for the Greenfield Focus scenario in Appendix 1.

Spatial Scenario 3: Balanced Focus

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

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

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

6.3. Advantages and Disadvantages of Spatial Scenarios

The NPS-UD requires consideration to be given to the advantages and disadvantages of different spatial scenarios in achieving the purpose of the draft FDS (a well-functioning urban environment, which provides capacity and integrates infrastructure and planning decisions).

The broad advantages and disadvantages of the differing spatial scenarios are outlined within the draft FDS.

An important aspect of considering the advantages and disadvantages of these spatial scenarios, is understanding what housing capacity the scenarios could deliver. To understand this capacity, the Councils have relied on assessments and evidence prepared Property Economics. This is in relation to the feasibility of intensification provided for through Medium Density Residential Zoning as well as assessments undertaken to inform decisions made under the PDP in relation to capacity more generally.

What this indicates is that intensification on its own will not be sufficient to meet the development capacity required over the long term, as shown in Table 4 below.

Table 4: Feasible Capacity Provided by the Urban Intensification Focus Scenario²⁵

Housing Demand and Capacity	Reasonable Expected to be Realised Capacity		
	Short	Medium	Long
Infill Development	5,738	5,738	5,738
Inner City development	994	994	994
Undeveloped Residential Land	2,081	2,081	2,081
Puketapu SPDA	647	647	647
Johnston SPDA	100	100	100
Patterson SPDA	107	107	107
Carrington SPDA	0	231	231
Junction SPDA	0	79	79
Junction FUZ	0	0	0
Frankley/Cowling FUZ	0	0	0
Area R FUZ	0	0	0
Oakura FUZ	0	0	0
Waitara FUZ	0	0	0
Smart FUZ	0	0	0
	9,667	9,977	9,977
Demand	883	3,953	11,026
Over/Under Supply	8,784	6,024	-1,049

²⁵ The data contained within table 4 is derived from a combination of sources. The infill data is based on the [Statement of Evidence of Timothy James Heath, Property Economics, 6 May 2022](#), with the remainder from the Housing and Business Capacity Assessment, NPDC, 2024, table 4.27 on page 59, with the FUZ capacity removed for this scenario.

The analysis shows that the greenfield scenario has the potential to provide sufficient housing capacity. This is shown in Table 5 below.

Table 5: Feasible Capacity Provided by the Greenfield Focus Scenario²⁶

	Reasonable Expected to be Realised Capacity		
	Short	Medium	Long
Infill Development	3,074	3,074	3,074
Inner City development	0	0	0
Undeveloped Residential Land	2,081	2,081	2,081
Puketapu SPDA	647	647	647
Johnston SPDA	100	100	100
Patterson SPDA	107	107	107
Carrington SPDA	231	231	231
Junction SPDA	79	79	79
Junction FUZ	82	82	82
Frankley/Cowling FUZ	574	574	574
Area R FUZ	322	322	322
Oakura FUZ	433	433	433
Waitara FUZ	187	187	187
Smart FUZ	2,647	2,647	2,647
NEW greenfield focus Areas	4,914	4,914	4,914
	15,478	15,478	15,478
Demand	883	3,953	11,026
Over/Under Supply	14,595	11,526	4,452

²⁶ The data contained within table 5 is derived from a combination of sources. The infill data is based on the [Statement of Evidence of Timothy James Heath, Property Economics, 6 May 2022](#). The new greenfield focus areas capacity was calculated for this scenario, using the same methodology applied in the Housing and Business Capacity Assessment, NPDC, 2024. The remainder of the data in table 5 is based on the Housing and Business Capacity Assessment, NPDC, 2024, table 4.27 on page 59.

As outlined in the most recent HBA, the balanced scenario provides sufficient capacity to meet demand. This is illustrated in Table 6 below.

Table 6: Feasible Capacity Provided by the Balanced Focus Scenario ²⁷

Housing Demand and Capacity	Reasonable Expected to be Realised Capacity Number of Dwellings		
	Short	Medium	Long
Infill Development	3,324	3,324	3,324
Inner City development	541	541	541
Undeveloped Residential Land	2,081	2,081	2,081
Puketapu SPDA	647	647	647
Johnston SPDA	100	100	100
Patterson SPDA	107	107	107
Carrington SPDA	0	231	231
Junction SPDA	0	79	79
Junction FUZ	0	0	82
Frankley/Cowling FUZ	0	0	574
Area R FUZ	0	0	322
Oakura FUZ	0	0	433
Waitara FUZ	0	0	187
Smart FUZ	0	0	2,647
	6,800	7,110	11,355
Demand	883	3,953	11,026
Over/Under Supply	5,917	3,157	329

The work of Property Economics has also more broadly considered the economic costs and benefits associated with intensification and greenfield expansion.²⁸

Other advantages and disadvantages set out within the draft FDS have been derived based on discussions and input from NPDC's internal infrastructure providers, including 3 waters and transport teams. These teams have provided advice in relation to current and future infrastructure challenges and the broad costs associated with rectifying these. These infrastructure challenges are detailed within Section 5 of this report.

²⁷ The data in table 6 above comes from the Housing and Business Capacity Assessment, NPDC, 2024, table 4.27 on page 59.

²⁸ Statement of Evidence of Timothy James Heath, Property Economics, 6 May 2022.

7. Evaluation Process

The following section outlines the process used to evaluate the additional areas considered. As noted previously, the boundaries of these areas are outlined in Appendix 1. It is anticipated that if additional areas are proposed through the consultation period on this draft, that they will be considered against this same criteria.

Evaluation criteria was developed to assess the new areas for potential residential growth. This section discusses how the evaluation criteria was grouped, the assumptions that were made when assessing areas and the general methodology.

7.1. Grouping of Evaluation Criteria

The grouping of the evaluation criteria and why they are important in considering residential growth is outlined below.

Landform

Generally it is easier to build on flat land rather than steep land. This is because flat land provides a stable foundation and it is easier to landscape and maintain. Steep land can offer unique benefits such as views and increased privacy but things like site preparation, laying foundations and erecting retaining walls can be complex, often resulting in a time-consuming and expensive process. In terms of the evaluation criteria, areas that are flat are considered more favourable for residential growth.

Highly Productive Land

Some parts of the district contain fertile soils and versatile land that help to support food and fibre production. It is important to manage the subdivision, use and development of this non-renewable resource for current and future generations. In terms of the evaluation criteria, areas of land that are not highly productive are considered more favourable for residential growth.

Scheduled Features and Protected Land

Throughout the district, there are many natural and physical resources that help people and communities to provide for their social, economic and cultural well-being and for their health and safety. These resources can also safeguard the life-supporting capacity of air, water, soil and ecosystems. It is important to manage the subdivision, use and development of these resources for current and future generations. In terms of the evaluation criteria, areas that will not adversely affect scheduled features and protected land are considered more favourable for residential growth.

Hazards and Risks

There is a wide range of existing and potential natural hazards in the district. When they occur, they can result in damage to property, infrastructure and the environment. More significantly, they can lead to loss of human life. As well as natural hazards, there are also hazardous substances located throughout the district which, if not appropriately stored and used, can pose potential threats to the health and safety

of the district's people, property and natural environment. In terms of the evaluation criteria, areas that do not contain hazards and risks are considered more favourable for residential growth.

Infrastructure

Infrastructure is critical to the social, economic, and cultural well-being of people and communities and the quality of the environment at a national, regional or local level. Infrastructure can be very expensive to plan, construct, operate, maintain and upgrade. Once it is up and running, it is important that it is not impeded by future activities. The NPS-UD also requires that the district has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural well-being, and for their health and safety, now and into the future. The ability to walk to a local centre to obtain convenience-based goods and services for everyday needs is considered an important aspect of a well-functioning urban environment. In terms of the evaluation criteria, areas that are already serviced or can be readily serviced by infrastructure, areas that will not impede infrastructure, and areas that have access or can have access planned within reasonable walking distance to a local centre are considered more favourable for residential growth.

Contiguous Zoning

The district has many different types of land uses. Through natural aggregation and past planning practices similar types of activities have grouped together, creating areas with distinct environmental characters. These are known as "zones." The characters of a zone can be adversely affected by activities that generate effects that are incompatible with that character. Spot/ad hoc zoning is when a piece of land has a zone that differs from the zoning of the land around it. It is generally not preferred because the provisions that apply to it can differ from those that apply to the surrounding zone and this can create different environmental outcomes. In terms of the evaluation criteria, areas that will adjoin areas with the same or similar zoning are considered more favourable for residential growth.

Reverse Sensitivity

In addition to ensuring that the amenity values that determine the character of an area are protected from activities that may degrade or detract from them, it is important to acknowledge that there can be potential conflict if a new activity is sensitive to the character of the area to which it has relocated, or the activities within it. This is known as "reverse sensitivity." Many of the activities that can be susceptible to reverse sensitivity form the backbone of the district's economy. In terms of the evaluation criteria, areas that will not compromise the operation of lawfully established primary production activities, rural industry or energy activities are considered more favourable for residential growth.

Tangata Whenua

Land zoned for Māori Purpose Zone and papakāinga developments are some of the ways in which tangata whenua are able to protect, develop and use their ancestral land in a way which is consistent with their culture and traditions and their social, cultural and economic aspirations. Papakāinga occurs on land that is owned by tangata whenua. It is a comprehensive development that provides residential accommodation with communal buildings and facilities for members of iwi or hapū groups. Papakāinga provides another housing choice for Māori and enables tangata whenua to maintain or re-establish connections to their Māori identity, culture, whānau and whenua. In terms of the evaluation criteria,

areas that will enable papakāinga as a permitted activity are considered more favourable for residential growth.




Table 7 below provides more detail on the evaluation criteria by outlining the categories evaluated, the general matters that were considered within each category, the features assessed, and the information sources used to inform the assessment for each area.

7.2. Assumptions



In compiling the evaluation criteria, the following assumptions were made:

- Recent analysis undertaken as part of the PDP process has determined that the district has sufficient commercial (i.e. retail and office) and industrial zoned land. It is assumed that future requirements for commercial and industrial land can be accommodated through intensification of the existing Commercial and Mixed Use Zones and the General Industrial Zone. Therefore the evaluation criteria does not include matters relating to commercial and industrial (e.g. proximity to current and future workers, exposure and visibility to customers, etc.). Instead it focuses on residential matters only. The Councils are required to do a HBA every three years. If it is determined at a later date that the amount of commercial or industrial zoned land is insufficient, the Councils will respond accordingly.
- When NPDC proposes land for rezoning, documents are produced that consider the appropriateness of the change and an assessment of the costs and benefits of the environmental, economic, social and cultural effects anticipated. These documents are supported by assessments from experts in specialist areas, e.g. landscape, transport, cultural values, etc. The evaluation of the areas has been done at a high level, which has relied on a level of judgement being applied. It is assumed that expert assessments will be carried out later, should NPDC propose land for rezoning in the future.
- In respect to the Hazards and Risks category, NPDC has only assessed those matters which pose an issue from a land use planning perspective. It is assumed that low probability/high risk matters, such as tsunamis, which pose an issue from an emergency management perspective, are addressed by the Taranaki Emergency Management Office.
- In relation to Highly Productive Land (LUC Class 1 to 3), if land is zoned Rural Production Zone in the PDP then regardless of whether the site is free of other constraints, it is considered that urban development is not appropriate. However, Clause 3.6(1) of the NPS-HPL may enable urban zoning of highly productive land in limited circumstances, such as where it is required to provide sufficient development capacity, there are no other practicable or feasible options for providing this capacity and the benefits of rezoning outweigh the costs associated with the loss of highly productive land.




Table 7: Evaluation Criteria Used to Assess New Areas

CATEGORY	MATTERS FOR CONSIDERATION	FEATURE	INFORMATION SOURCE	COLOUR ALLOCATION FOR EACH FEATURE
Landform 	Area is generally at a gradient that enables development	Contours	NPDC MILES spatial layer – contours	Green = generally flat Orange = some hills Red = steep
Highly Productive Land 	Areas which are located on Land Use Capability (LUC) Class 1, 2 or 3 land and are zoned Rural Production under the PDP are generally not appropriate for urban development	Land use capability classes	TRC spatial layer – Land Use Capability Classification (NZLRI) NPDC PDP spatial layer – Zones	Green = land not zoned RPROZ, or land zoned RPROZ and not identified as LUC Classes 1 to 3 Orange = land zoned RPROZ and identified LUC Classes 1 to 3 as which covers some of the area. Red = land zoned RPROZ and identified as LUC Classes 1 to 3 which covers all of the area.
Scheduled Features and Protected Land 	Coastal environments (including the coastal marine area), wetlands, lakes and rivers and their margins are less favourable for growth	Coastal environment	NPDC PDP spatial layer – coastal environment	Green = not on area Green * = on some of area but allocated green to prevent an inaccurate result Orange = on some of area Red = over whole of area
		Wetlands	TRC spatial layer – Scheduled Wetlands TRC FWP 2001	
		Lakes	NPDC PDP spatial layer – waterbody (lake)	
		Rivers	NPDC PDP spatial layer – waterbody (river)	
		Waterbody catchment	NPDC PDP spatial layer – waterbody catchment control	
	Outstanding natural features and landscapes will be avoided	Natural features and landscapes	NPDC PDP spatial layer – outstanding natural feature and landscape	Green = not on area Orange = on some of area Red = over whole of area

CATEGORY	MATTERS FOR CONSIDERATION	FEATURE	INFORMATION SOURCE	COLOUR ALLOCATION FOR EACH FEATURE
	Public access to and along the coastal marine area, lakes and rivers will be maintained and enhanced, along with strategic public access corridors (coastal walkways, Taranaki Traverse, shared pathways, esplanade strips, esplanade reserves, access strips and access links)	Outstanding natural character	NPDC PDP spatial layer – outstanding natural character	
		Public access corridors	NPDC PDP spatial layer – public access corridor (coastal marine area, lakes and rivers only)	Green = not on area Green * = on some of area but allocated green to prevent an inaccurate result Orange = on some of area Red = over whole of area
		Significant indigenous vegetation and significant habitats of indigenous fauna should be avoided	NPDC PDP spatial layer – significant natural area	Green = not on area Orange = on some of area Red = over whole of area
	Effects on ancestral lands, water, sites, waahi tapu and other taonga should be carefully managed	Conservation covenants	TRC spatial layer – QEII National Trust Covenant boundaries	
		Sites and areas of significance to Māori	NPDC PDP spatial layer – site of significance to Māori	Green = none in area Green * = on some of area but allocated green to prevent an inaccurate result Orange = some in area Red = many in area
			NPDC PDP spatial layer – 50m/200m SASM/AS	
		Historic places (Category 1 and 2), historic areas, wāhi tūpuna, wāhi tapu, wāhi tapu area	New Zealand Heritage List/Rārangi Kōrero	
	Effects on historic heritage should be carefully managed	Heritage buildings, items and character areas	NPDC PDP spatial layer – heritage building or item	Green = none in area Green * = on some of area but allocated green to prevent an inaccurate result Orange = some in area Red = many in area
			NPDC PDP spatial layer – heritage building or item extent	
			NPDC PDP spatial layer – heritage character area	
		Historic places (Category 1 and 2), historic areas	New Zealand Heritage List/Rārangi Kōrero	
		Archaeological sites	NPDC PDP spatial layer – archaeological site	
			NPDC PDP spatial layer – archaeological site extent	
		Notable trees	NPDC PDP spatial layer – notable tree	
			NPDC PDP spatial layer – notable tree group	

CATEGORY	MATTERS FOR CONSIDERATION	FEATURE	INFORMATION SOURCE	COLOUR ALLOCATION FOR EACH FEATURE
Hazards and Risks 	The risks associated with natural hazards and their impact on people, property and the environment are carefully managed	Volcanic eruption	NPDC PDP spatial layer – volcanic hazard area	Green = not on area Orange = on some of area Red = over whole of area
		Earthquake fault line	NPDC PDP spatial layer – fault hazard area	
		Coastal erosion	NPDC PDP spatial layer – coastal erosion hazard	
		Coastal flooding	NPDC PDP spatial layer – coastal flooding hazard area	
		Flood detention area/spillway	NPDC PDP spatial layer – flood detention area/spillway	
		Flood plain	NPDC PDP spatial layer – flood plain	
		Stormwater flooding	NPDC PDP non district plan spatial layer – stormwater flooding area	Green = not on area Green * = on some of area but allocated green to prevent an inaccurate result Orange = on some of area Red = over whole of area
		Liquefaction	Report for NPDC by Tonkin & Taylor Ltd October 2021 – New Plymouth District Liquefaction Vulnerability	Green = unlikely (not on area) or undetermined Orange = possible (on some of area) Red = possible (over whole of area)
	People and property will not be exposed to hazardous substances	Significant hazardous facilities	NPDC PDP spatial layer – risk management contour	Green = not on area Orange = on some of area Red = over whole of area
Infrastructure 	Area is serviced with water infrastructure which meets current levels of service, or it is available at the boundary	Water infrastructure	NPDC MILES spatial layer – water supply plus comment from Council subject matter expert	Green = serviced and no issues Orange = serviced but issues that can be overcome or services available nearby Red = serviced but significant issues, or not serviced
	Area is serviced with stormwater infrastructure which meets current levels of service, or it is available at the boundary	Stormwater infrastructure	NPDC MILES spatial layer – stormwater plus comment from Council subject matter expert	
	Area is serviced with wastewater infrastructure which meets current levels of service, or it is available at the boundary	Wastewater infrastructure	NPDC MILES spatial layer – wastewater plus comment	

CATEGORY	MATTERS FOR CONSIDERATION	FEATURE	INFORMATION SOURCE	COLOUR ALLOCATION FOR EACH FEATURE
			from Council subject matter expert	
	Area is serviced or can reasonably be serviced with multiple forms of transport infrastructure (including private vehicles, public transport, walking and cycling)	Transport infrastructure	TRC buses and transport/ routes and timetables webpage	
	Area has access within reasonable driving distance to social infrastructure, including educational facilities, health facilities, community facilities and public open space (this may not be within the area itself)	Social infrastructure	Desktop analysis/site visit	
	Area has access within reasonable walking distance to a local centre providing a variety of convenience-based goods and services for everyday needs (this may not be within the area itself), or a local centre can be planned for in a structure plan	Local centre	Desktop analysis/site visit	Green = all nearby Orange = some nearby Red = none nearby
	Area will not impede infrastructure that is significant at a national, regional or district level	Gas transmission pipeline	NPDC PDP spatial layer – pipeline	Green = not on area or is on area but area is owned by requiring authority Orange = on some of area Red = over whole of area
			NPDC PDP spatial layer – pipeline corridor	
			NPDC PDP spatial layer – gas transmission station corridor	
		National grid	NPDC PDP spatial layer – national grid	
			NPDC PDP spatial layer – national grid subdivision corridor	
			NPDC PDP spatial layer – national grid substation corridor	
		Airport	NPDC PDP spatial layer – airport noise control boundary	
		Port	NPDC PDP spatial layer – port noise control boundaries	

CATEGORY	MATTERS FOR CONSIDERATION	FEATURE	INFORMATION SOURCE	COLOUR ALLOCATION FOR EACH FEATURE
		Designations (includes railway corridors and state highways)	NPDC PDP spatial layer – designations	
Contiguous Zoning 	Area will be consistent with surrounding land uses and not result in spot/ad hoc zoning	Zoning	NPDC PDP spatial layer – zone, desktop analysis/site visit	Green = adjacent to same or similar zoning Orange = not adjacent to same or similar zoning but could be considered due to factors such as topography, existing urban layout, etc. Red = not adjacent to same or similar zoning
Reverse Sensitivity 	New residential and business land uses will not compromise the operation of lawfully established primary production activities, rural industry or energy activities	Energy activities Quarries Pig farms Poultry farms	NPDC PDP spatial layer – Major Facility Zone Motunui, Waitara Valley and McKee Mangahewa noise control boundaries TRC spatial layer – Consents/Primary Industry Purpose/Mining Extraction (excluding hydrocarbon) NPDC MILES spatial layer – pig farms NPDC MILES spatial layer – poultry farms	Green = not on area Orange = on some of area Red = over whole of area
Tangata Whenua 	Development will enable tangata whenua to protect, develop and use their ancestral land in a way which is consistent with their culture and traditions and their social, cultural and economic aspirations	Papakāinga	NPDC PDP spatial layer – Zones	Green = permitted activity (MPZ, LRZ, GRZ, MRZ, RPROZ, RLZ, LCZ, CZ, TCZ, CCZ, OSZ, FUZ) Orange = restricted discretionary activity (NOSZ, SARZ) or discretionary activity (MUZ) Red = non-complying activity LFRZ, GIZ, AIRPZ, HOSZ, MFZ, PORTZ)

7.3. Methodology

Each criterion for each area was allocated one of the following traffic light assessment ranking colours:

	Aligns with the matter for consideration
*	Aligns with the matter for consideration but there are features within the Scheduled Features and Protected Land category and the Hazards and Risks category present
	Somewhat aligns with the matter for consideration
	Does not align with the matter for consideration

More detail on how these colours were specifically applied is contained in the final column of Table 7.

Where more than one feature was assessed for a category, the colour allocated was a summary of all features assessed. For example, three greens assessed meant a green colour was allocated overall, two oranges and one green assessed meant an orange colour was allocated overall, etc.

For the matters considered within the Scheduled Features and Protected Land category and the Hazards and Risks category, it was generally considered more accurate to allocate an orange colour rather than automatically allocate a red colour (indicating that the area does not align with the matter for consideration) because, in many instances, a consenting pathway exists in the PDP and it does not mean that development cannot occur.

Following an initial assessment, it was decided to change the orange colour to a green colour with an asterix (*) in some areas that contained one or a few of a certain feature. Most of the areas assessed are substantial in size and discounting them due to the presence of only one or a few of these features could give an inaccurate result and unreasonably rule areas out. Examples include a waterbody or a cluster of archaeological sites near the edge of an area. These features, the categories within which they fall, and the reason for changing the colour is as follows:

- Scheduled Features and Protected Land – Waterbody: It is inappropriate to discount an entire area which contains a waterbody as the waterbody may only cover part of a property.
- Scheduled Features and Protected Land – Public Access [public access corridors]: It is inappropriate to discount areas containing public access corridors because they can be isolated in nature and some are located on land zoned as one of the three Open Space and Recreation Zones, where residential development is already restricted.
- Scheduled Features and Protected Land – Historic Heritage (archaeological sites) and SASM [sites and areas of significance to Māori] [historic places (Category 1 and 2), historic areas, wāhi tūpuna, wāhi tapu, wāhi tapu area]: It is inappropriate to completely discount areas containing these features because they may only cover part of a property.
- Scheduled Features and Protected Land – Historic Heritage [heritage buildings, items and character areas] [historic places (Category 1 and 2), historic areas] [archaeological sites] [notable trees]: It is inappropriate to discount areas containing these features because these features tend to be isolated in nature and affect only one parcel of land.
- Hazards and Risks – Natural Hazards [stormwater flooding areas]: It is inappropriate to discount areas containing stormwater flooding areas because, in most situations, engineering solutions can be developed. Secondary to this, but also important, is that stormwater modelling has only been

carried out for parts of the district, meaning that stormwater flooding areas may appear more prevalent in some areas than others when this is not the case.

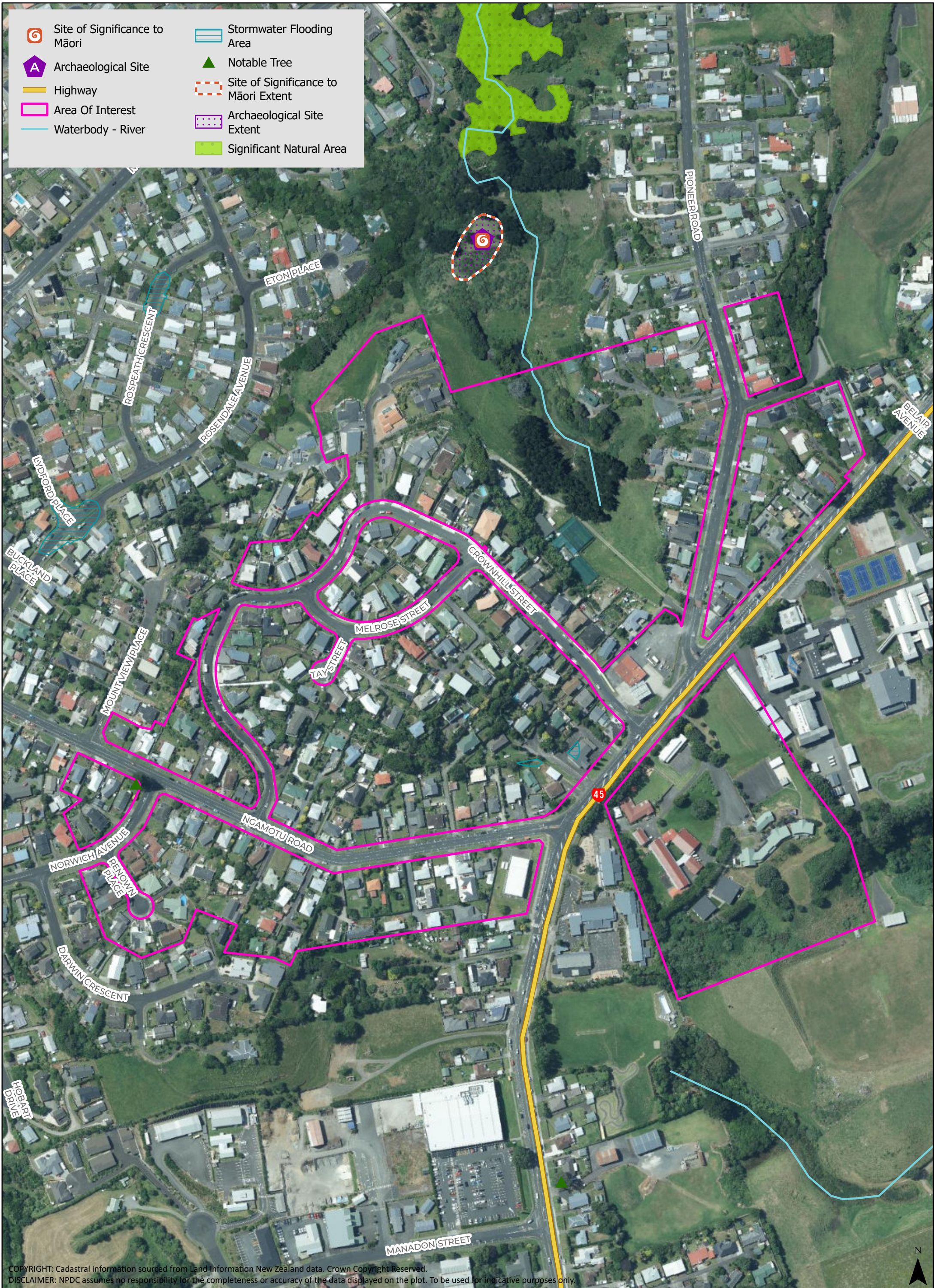
The results of the assessment for each area against the evaluation criteria are attached as Appendix 3.


8. Appendices

Appendix 1: Maps Showing Boundaries of New Areas Assessed – Urban Intensification Focus and Greenfield Focus


Appendix 2: Maps Showing District Wide Constraints

Appendix 3: Evaluation of New Areas – Urban Intensification Focus and Greenfield Focus







Site of Significance to Māori




Area Of Interest




Highway




Waterbody - River




Notable Tree




Site of Significance to Māori Extent



Archaeological Site Extent



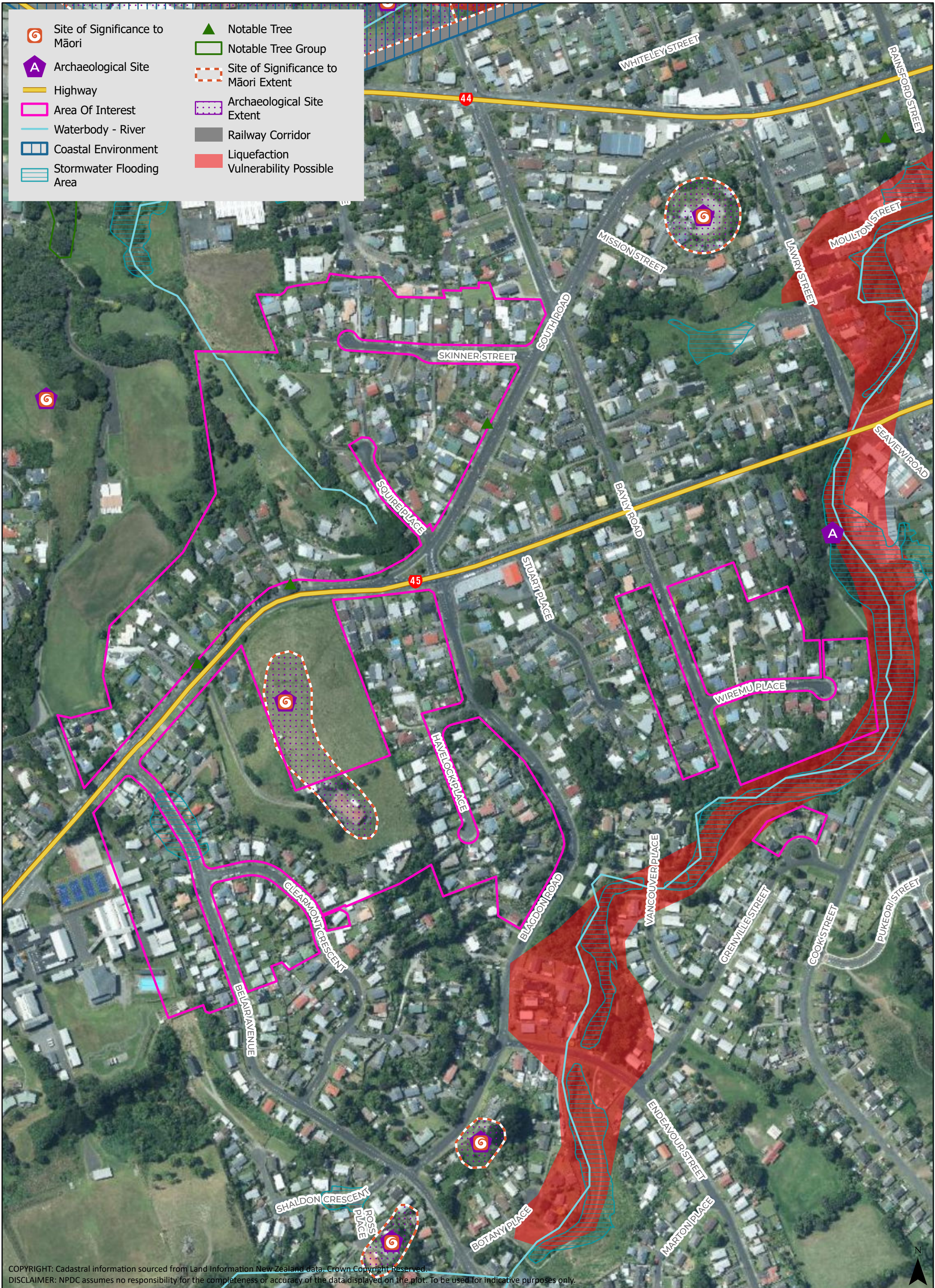
Significant Natural Area



Stormwater Flooding Area

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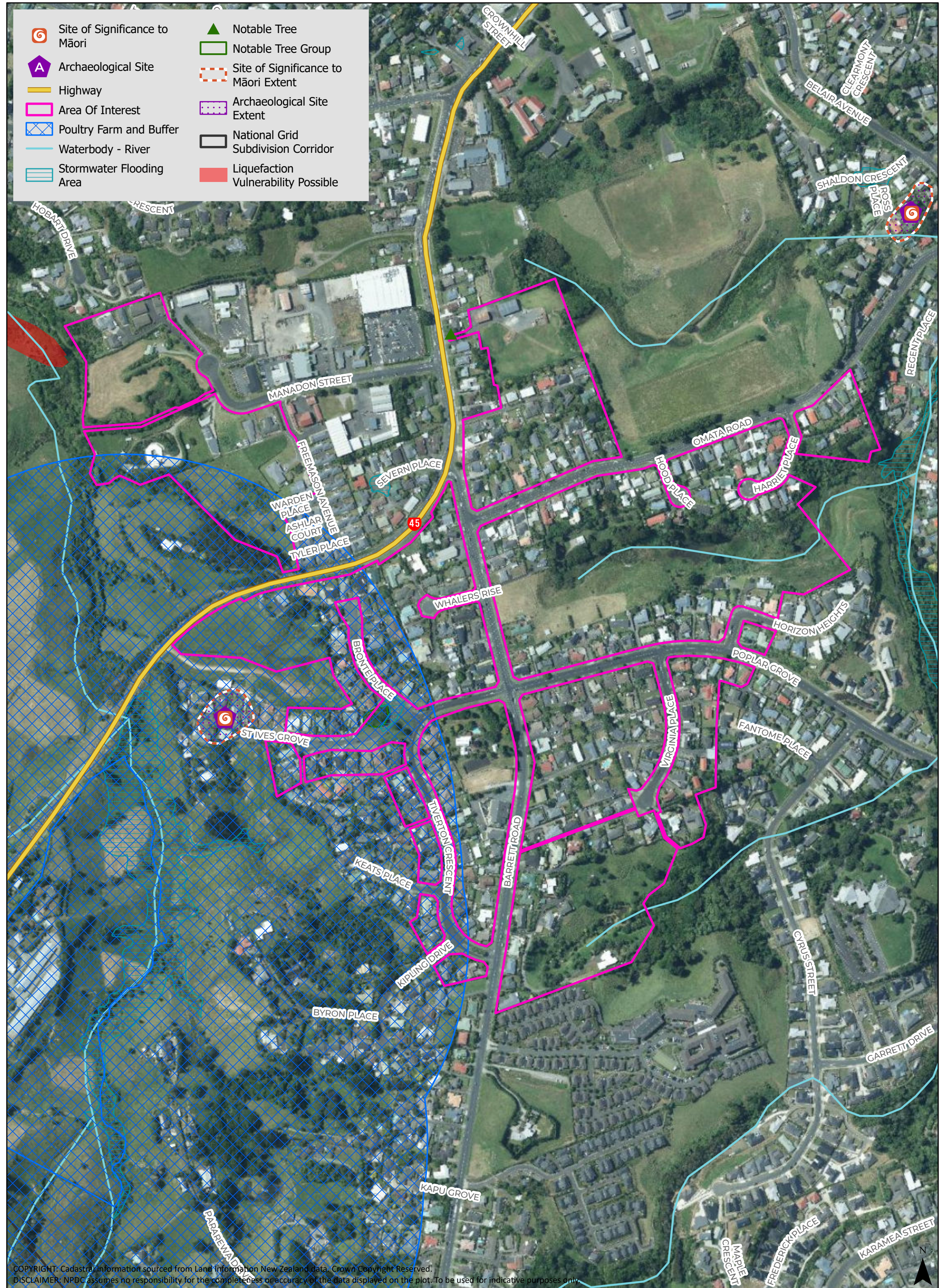




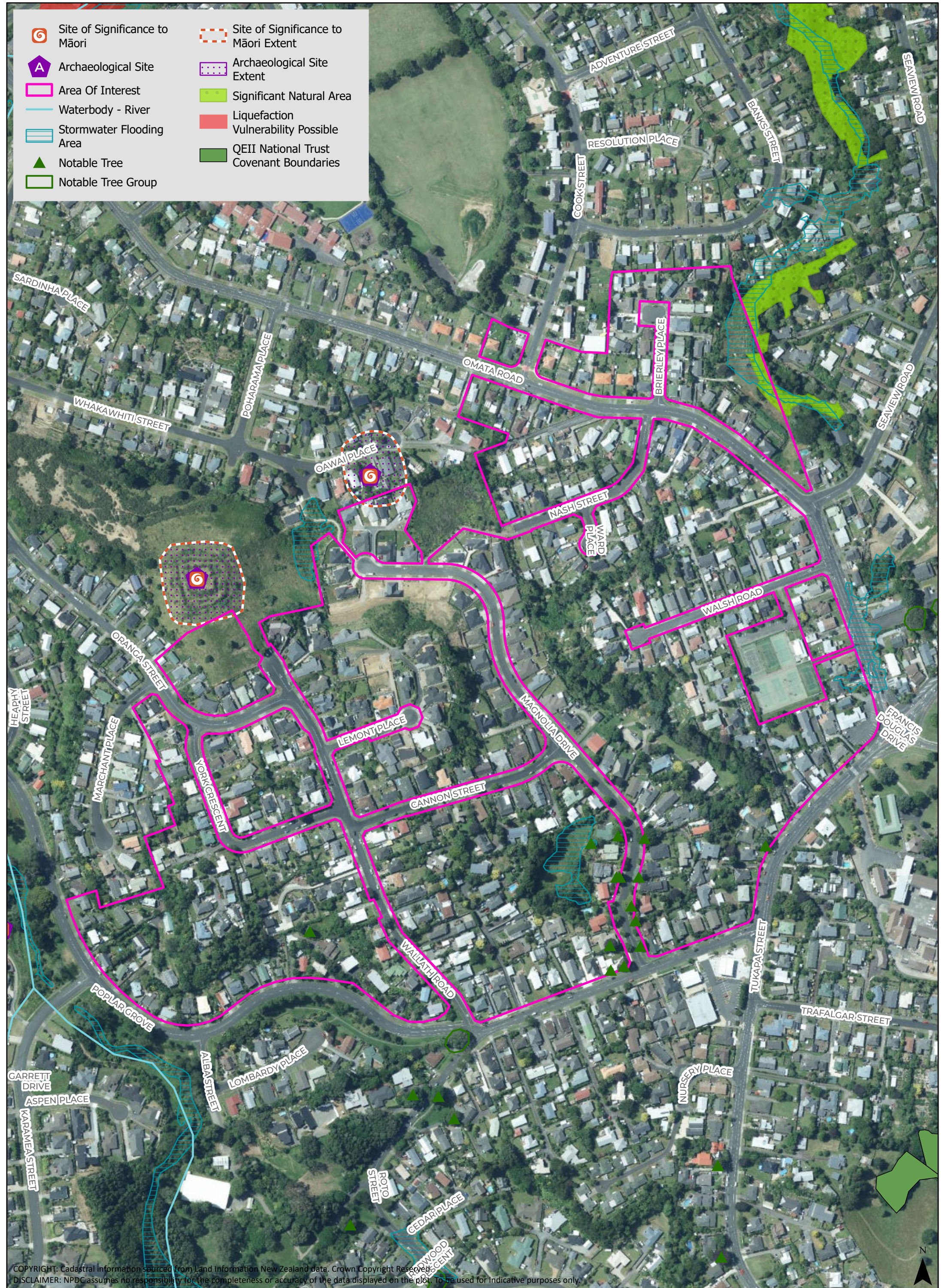
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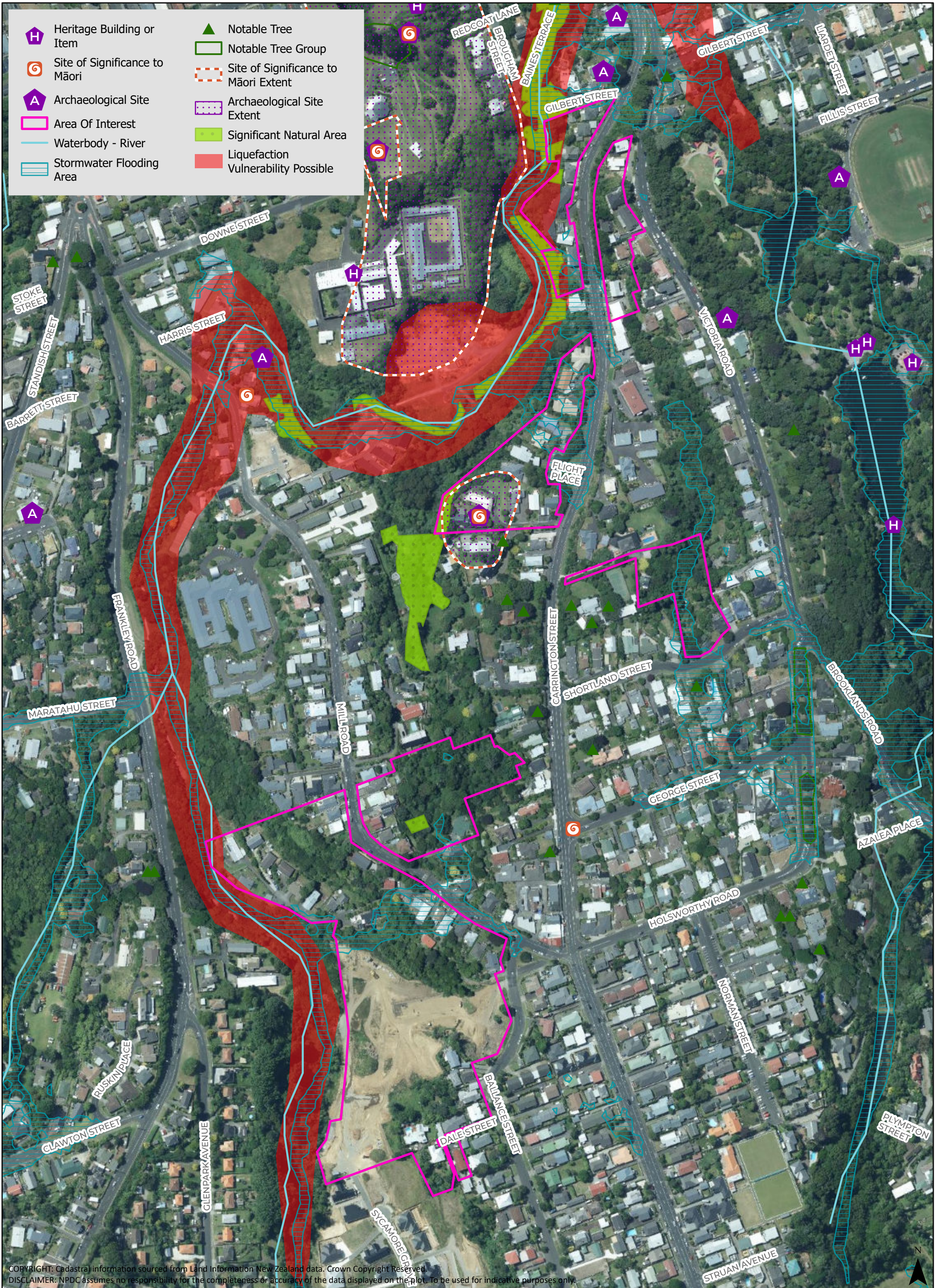
- | | | | |
|--|-------------------------------|--|---|
| | Heritage Building or Item | | Notable Tree Group |
| | Site of Significance to Māori | | Site of Significance to Māori Extent |
| | Archaeological Site | | Archaeological Site Extent |
| | Area Of Interest | | Flood Detention Area/Spillway |
| | Waterbody - River | | Significant Natural Area |
| | Stormwater Flooding Area | | QEII National Trust Covenant Boundaries |
| | Notable Tree | | |

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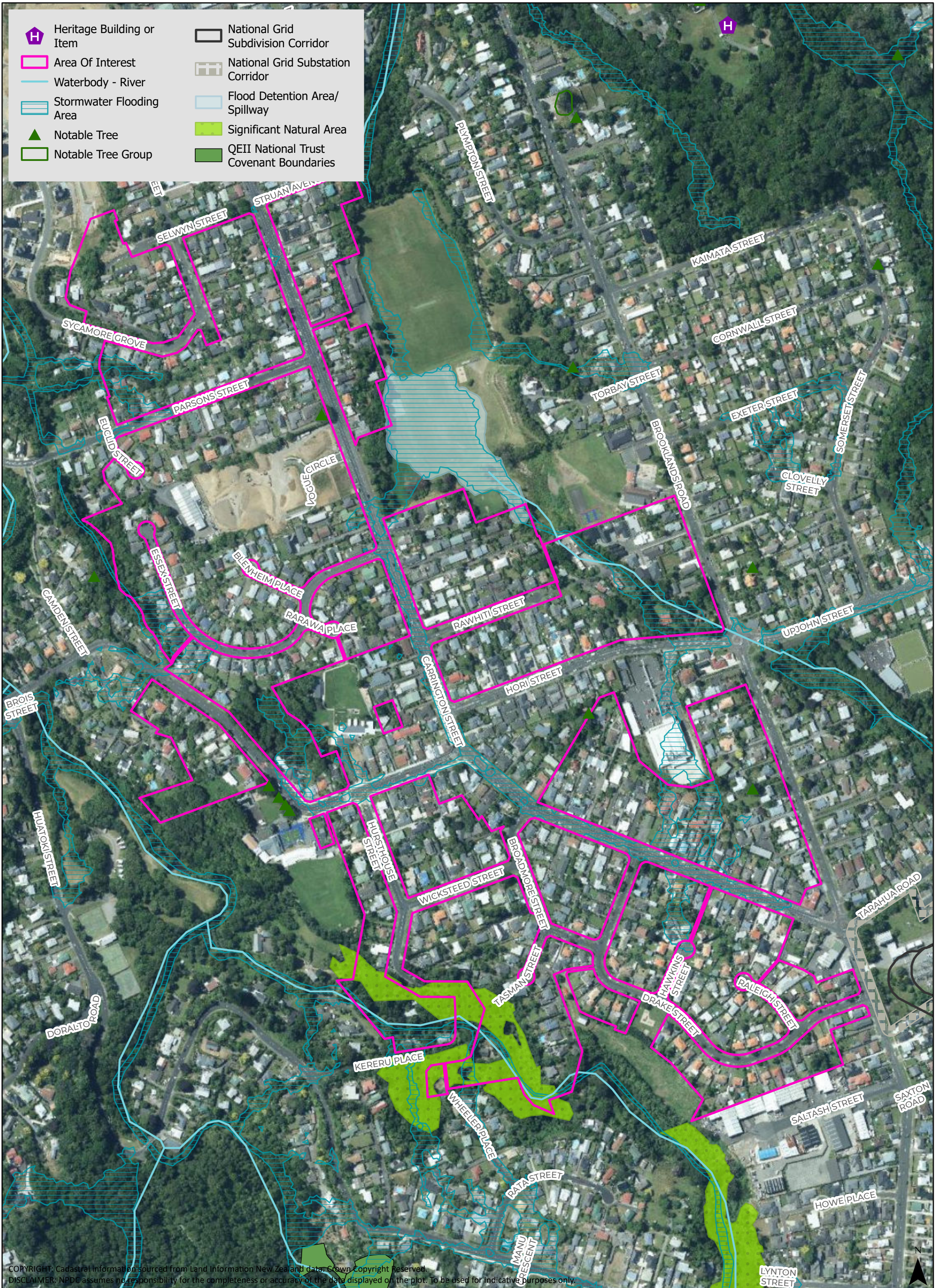




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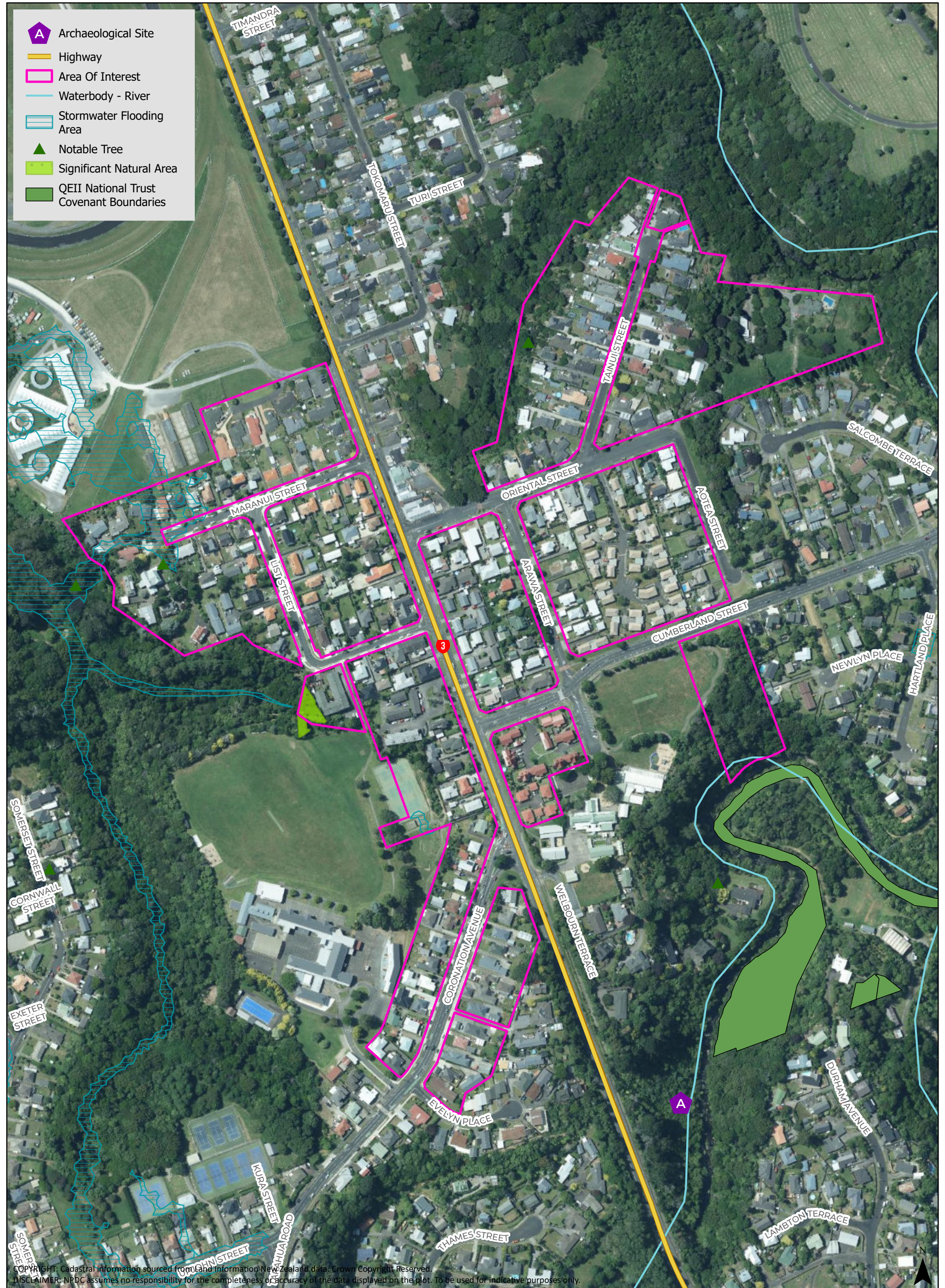




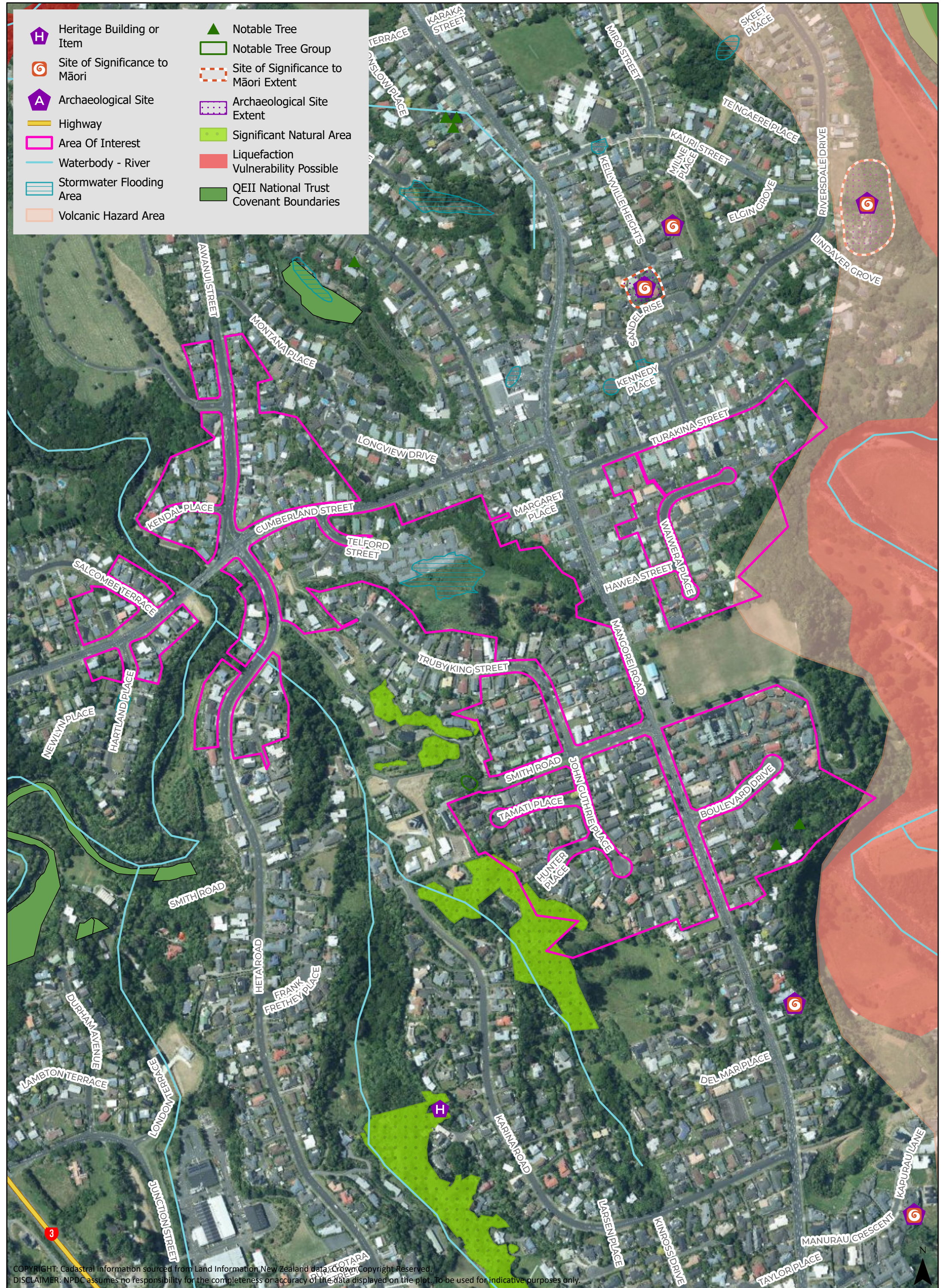
- Area Of Interest
- Waterbody - River
- Stormwater Flooding Area
- National Grid Subdivision Corridor
- National Grid Substation Corridor
- Flood Detention Area/ Spillway
- Significant Natural Area

ALPINE GROVE

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