

**BEFORE THE NEW PLYMOUTH DISTRICT COUNCIL
INDEPENDENT HEARING COMMISSIONERS**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a request for Private Plan Change NPDC PLC18/00048
by Oakura Farm Park Limited to rezone land at Oakura
within the New Plymouth District

**STATEMENT OF FURTHER EVIDENCE OF ALAN LEONARD DOY ON BEHALF OF
OAKURA FARM PARK LIMITED**

Dated 11 October 2019

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INTRODUCTION

1. This further evidence is in response to the Hearing Commissioner's direction of 6 September for further evidence. I note the Commissioner's emphasis that unnecessary repetition of evidence already given and new matters are to be avoided.

WAIRAU ESTATE – REDUCED PROPOSAL

2. On receipt of the revised Wairau Estate – Landscape Framework prepared by Mr Richard Bain and the Structure Plan, I have revised the proposed subdivision layout and introduce the 144-lot proposal refer **Attachment A**. Also attached as **Attachment B** is the revised smaller scheme overlaid on the original scheme included in PPC 48 Request.

CONTEXT

3. The revised subdivision layout is responsive to the characteristics of the site by respecting the local landform consistent with the Mr Bains 'fresh look' landscape assessment. Refer **Attachment C**. The new approach utilises the existing Wairau Stream tributary and McKie QEII Covenant as natural features defining the eastern and southern extent of the downsized structure plan area. In all 6.9 hectares of land is to be set aside for open space and revegetation of the existing natural features of the site.

ACCESS AND CONNECTIONS

4. The subdivision integrates with the surrounding neighbourhood and caters for differing modes of transport. Whilst a single entrance from Wairau Road provides the primary access to the site, provision has been made for connections to the west and State Highway should these be necessary in the Long Term.

5. The development has been designed to not only cater for vehicular traffic but provides significant opportunities which promote cycling and pedestrian connections within the development.
6. Street infrastructure is likely to be in the context of New Plymouth District Council E11 – Bi- Directional and E12 road layouts and cross sections catering for all modes of transport, parking and tree planting. Refer **Attachments D1 and D2.**
7. Pedestrian and cycling connectivity is provided to South Road, Wairau Road and Pahakahaka Drive utilising existing routes. Access to the Oakura commercial precinct and School is achieved via the Donnelly Street path.

LAYOUT

8. The layout of the development has been designed in an integrated and comprehensive manner responding to the site's characteristics. The landform has been respected with existing gullies set aside as open space and further land designated to provide an ecological connection linking the Wairau Stream tributary and McKie QEII Covenant.
9. The size and layout of the blocks responds to the size and shape of the topography, promoting connectivity and minimises the number of rear sites. The layout includes one cul de sac which is a necessity due to the landform and inability to provide a vehicular connection to South Road.
10. The size of allotments illustrated are generally 600 – 700m² and of regular shape, meeting the criteria for the Proposed District Plan (PDP) General Residential Zone – Oakura (600m²)¹. Adopting the PDP minimum area

¹ NPDC Proposed District Plan – publicly notified 23 September 2019

results in the yield of approx. 144 lots. If the existing Residential C Environment Area for Oakura, with its larger minimum lot size of 700m² is adopted, the yield for the reduced area will be approx. 123 lots, a yield which aligns well with the FUD South area estimate of 117 lots.²

11. The streets have been oriented to maximise solar access for allotments. In most instances the long axis of allotments is oriented east west. The layout has been designed to minimise disturbance by earthworks and follows the natural landform, with changes appearing as natural as possible. Slopes across sites are generally no greater than 1 metre in the vertical. Any retaining structures will be low in profile and will be able to be effectively concealed in landscaping.
12. Several larger allotments have been created which are of sufficient area and with suitable house sites to mitigate reverse sensitivity issues which may arise if they were in closer proximity to the State Highway. All dwelling sites, including those within the three larger allotments, allow for all future dwellings to be located at least 80m from the edge of SH45 thus removing the need for a noise attenuation bund.

CHARACTER AND SENSE OF PLACE

13. The layout for Wairau Estate creates an attractive and safe residential environment with a high level of amenity integrated into the natural character of the site.

OPEN SPACE

14. The layout for the reduced Wairau Estate includes 26% as Open Space of the 26.3ha total development area. This Open Space will enhance the

² NPDC HBD Capacity Assessment – March 2019 - pgs 35 & 36.

existing natural character by providing further extension to the Mckie QEII covenant and esplanade along the Wairau Stream tributary.

15. The areas of open space are to be utilised for low impact stormwater management, pedestrian and cycling connectivity while also providing increased ecological habitat and connectivity through revegetation and supplementary planting, which in turn will be positive for local amenity.
16. An area (some 2000m²) has been identified as open space for informal 'kick a ball' recreation activities is located central to the development with good connectivity for all modes of transport.

WATER SUPPLY ALLOCATION

17. This proposal seeks to a total of 144 lots, 15 lots more than the 129-lot yield estimated for FUD South (adopted Kiss). Whilst this exceeds the total number of lots Council are confident they can service, it is not anticipated all of these allotments will be developed in the short term and through a staged approach the water allocation can be managed. This may require a rule concerning how and when development occurs for Wairau Estate Stage 5.

OTHER MATTER – RESIDENTIAL CAPACITY AND WATER SUPPLY

18. In response to the Section 42A report concerning the apportioning of water to the South and West FUD areas; I am concerned Council have taken the approach of apportioning water reflecting the relative land area/yields of the FUDs in Oakura.
19. Whilst this may be considered a nationally recognised methodology, I am of the opinion the information used to undertake the apportioning still needs to be accurate and fairly reflect the yields available. In this instance

two surveyors (Submitter#108 S Kiss and myself) have independently arrived with similar yields which differ with Table 4.8 in the Housing and Business Capacity Assessment. Council are of the opinion their 'analysis used for Oakura is sound' [Section 42A Page 26 para 3.37]; however, this is in contrast to the NPDC Housing & Business Development Assessment March 2019 Page 45, section 4.4 para 3.

Refining feasibility modelling and ground-truthing in the local market are necessary for results to be considered reliable assessments of feasible commercial dwelling capacity in the district.

20. In my view it would be more appropriate to adopt the refined analysis of the evidence provided by Mr Kiss and myself.

Table 1: Land Supply Comparison

	HBA (NPDC) (Lots)	Alan Doy (applicant's surveyor) (Lots)	Stefan Kiss (submitting surveyor) (Lots)
Oakura Infill	127	(48) Note 1	48
Undeveloped Residential Land Oakura	157	134	140
Oakura West FUD	355	283	295
Oakura South FUD	117	125	107-129
Totals	756	590	590 - 612

Note:

In my original evidence I had not undertaken any assessment of the potential for infill within Oakura. In light of the evidence submitted by Mr. Kiss, I have undertaken a brief study and concur the potential for infill is more than likely to yield nearer the 48 lots proposed by Mr Kiss as opposed to the 127 lots estimated in the Housing and Business Assessment. I acknowledge the Proposed New Plymouth District Plan may open up some opportunities for smaller allotments; however, these opportunities are low given the existing fragmentation of the cadastre, topographical constraints and siting of existing buildings. In addition, any application for subdivision creating smaller allotments is likely to be discretionary or non-complying.

21. The large difference in lot yield potential for the Undeveloped Residential Land and West FUD is primarily due to large tracts of land which in my view are generally unsuitable for subdivision due to the risk of inundation, difficult topography and land covenants restricting further subdivision.
22. In my opinion the potential lot yield is more likely to be approx. 612 lots given that Mr Kiss and myself have arrived at our respective assessments independently.
23. Council's Infrastructure Group have advised in their reply [Section 42A Appendix 3 Page 3] there is sufficient water supply for an additional 589 lots, a 23-lot deficit when compared with my proposed 612 lot yield. In their summary, Page 10 they state:

There is a possibility that we may be able to service a greater number in future once additional work is done (e.g. drilling a new bore and confirming actual wastewater peaking factors and per capita generation).

24. Furthermore, they conclude:

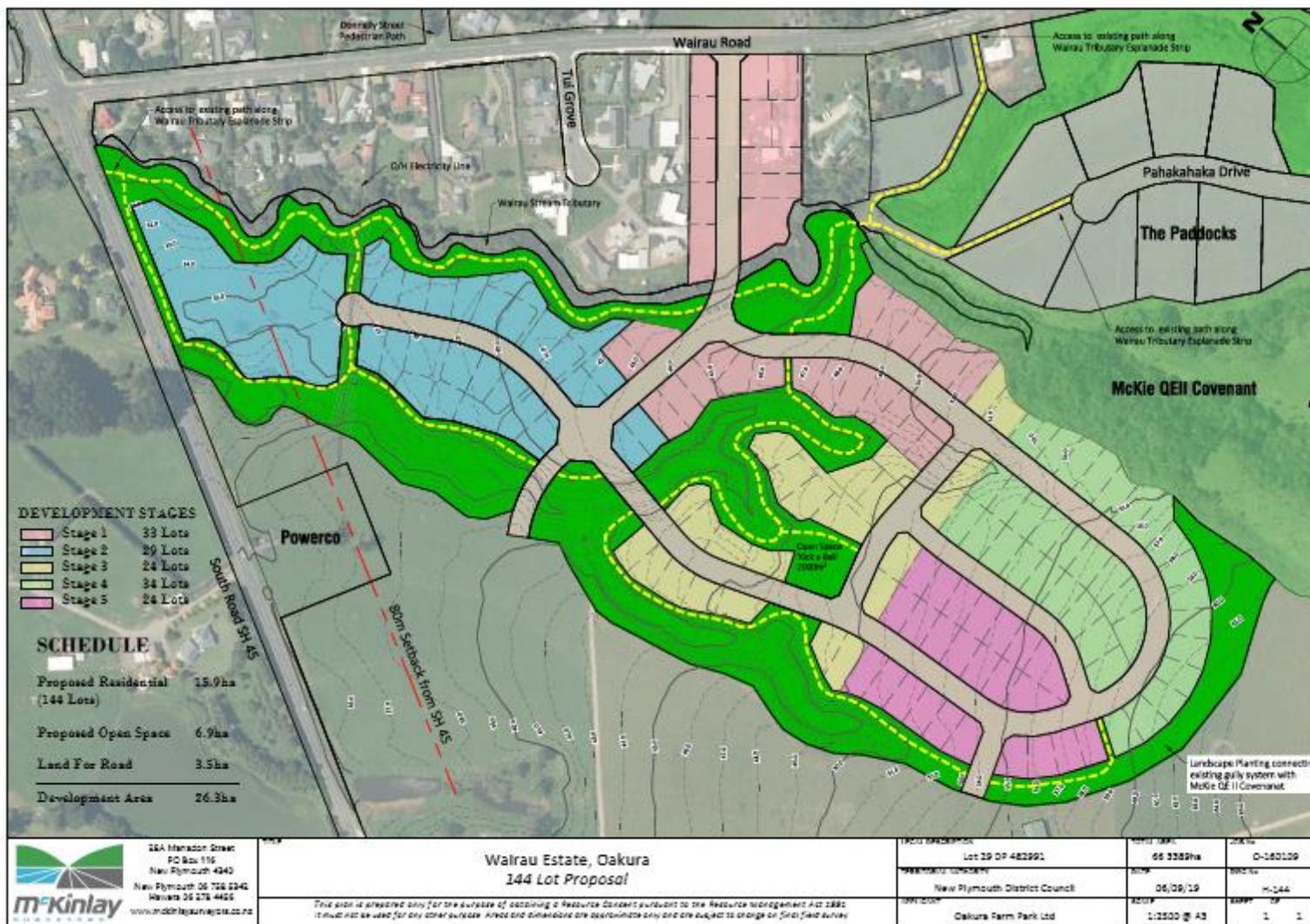
A staged approach may be possible making the release of land subject to confirmation of the uncertainties above.

25. Taking into consideration the refined and ground-truthed lot yield, these comments suggest there is sufficient capacity for both South and West FUDs subject to a staged and managed release of lots.

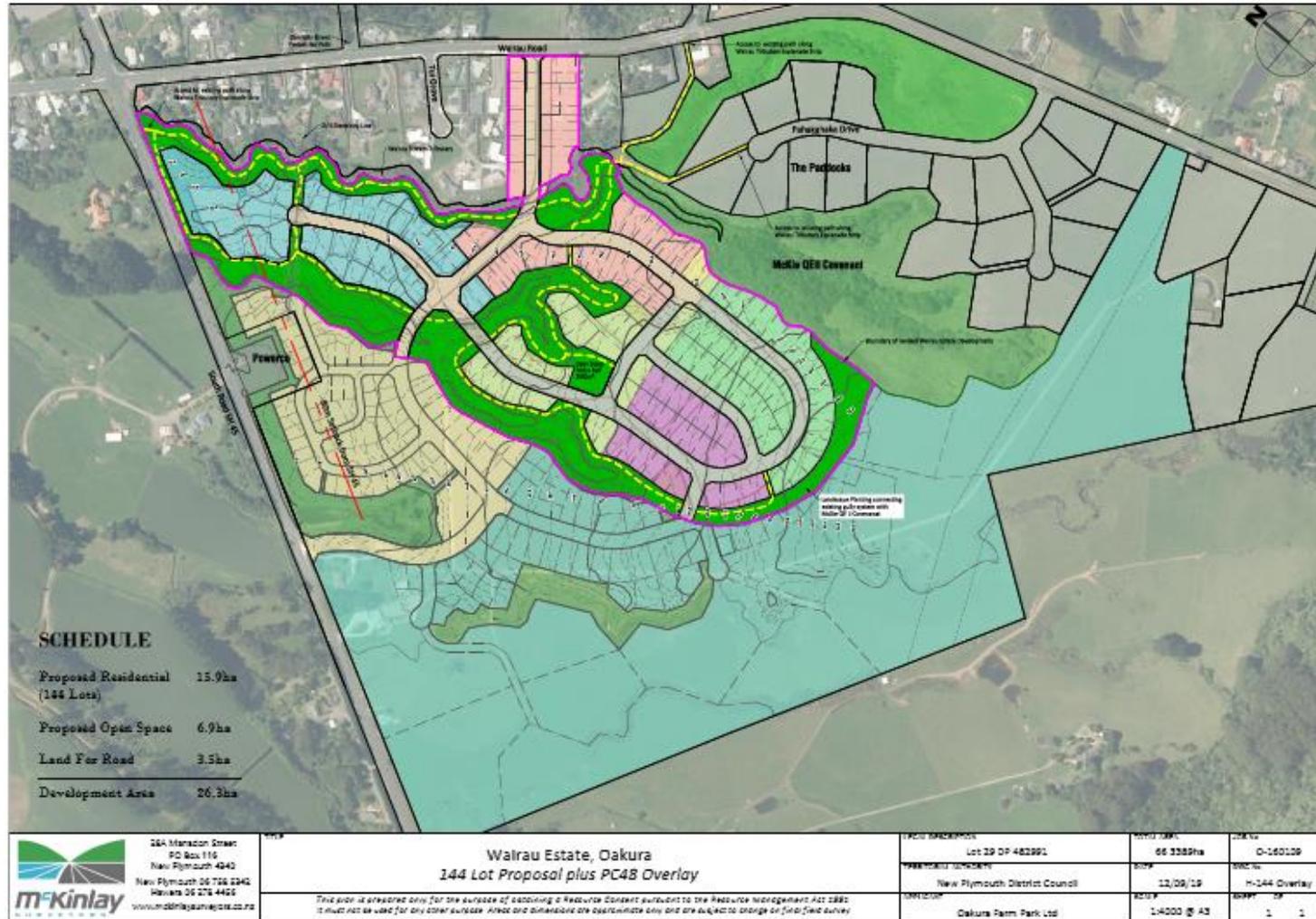
Alan Doy
11 October 2019

APPENDIX A

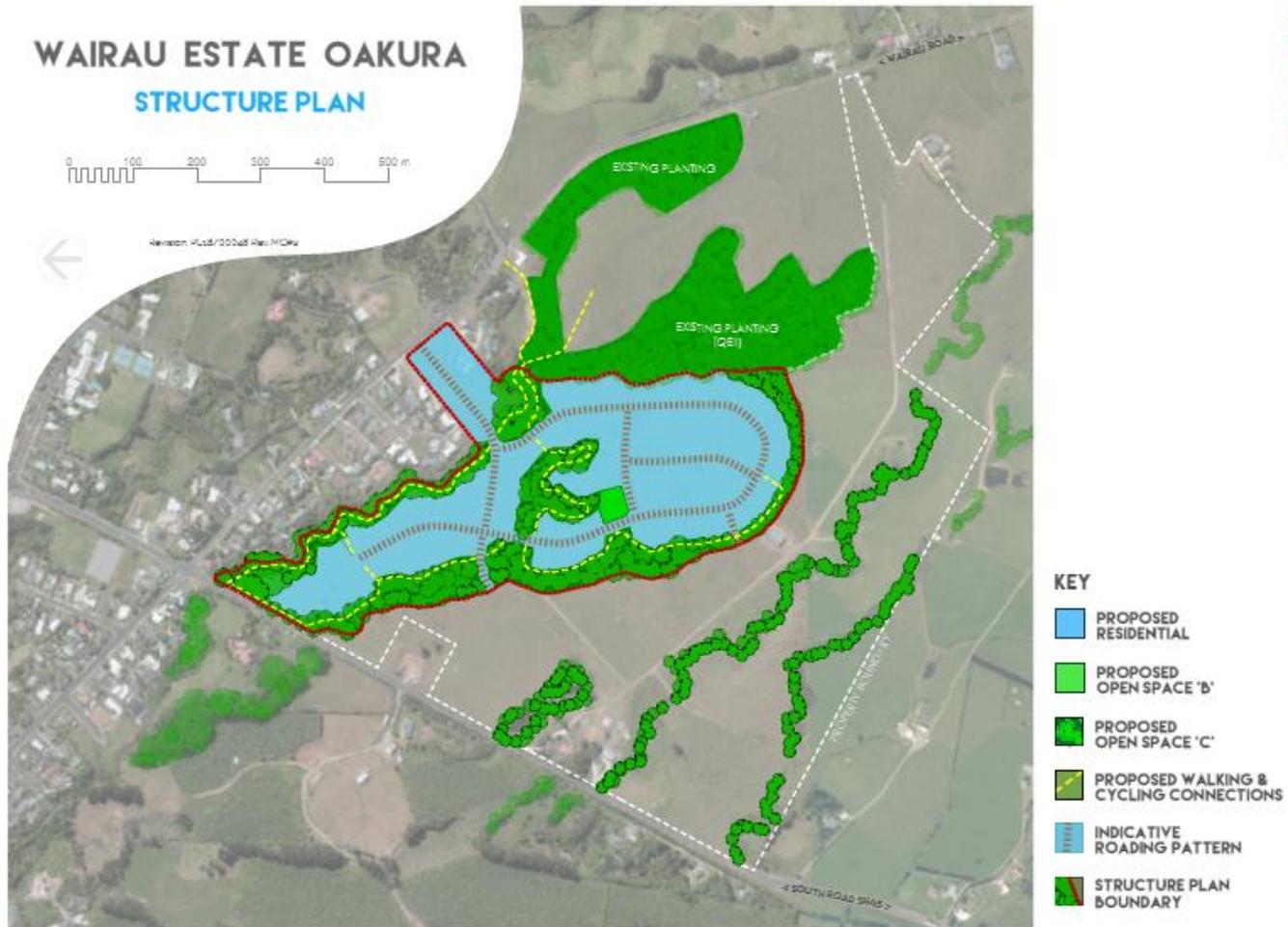
REDUCED SCHEME - INDICATIVE ROADING, OPEN SPACE AND DEVELOPMENT STAGES ETC.



APPENDIX B
ORIGINAL SCHEME WITH REDUCED SCHEME OVERLAID



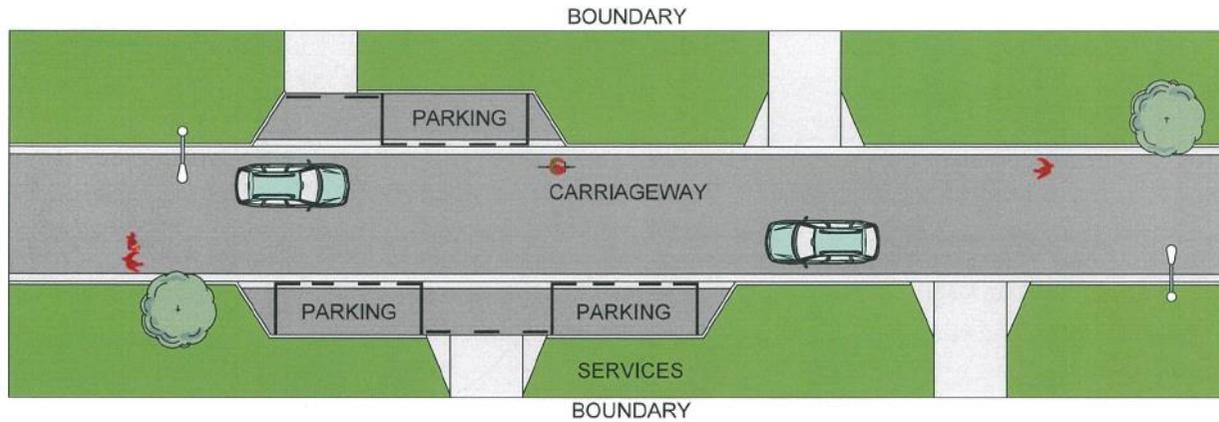
APPENDIX C
STRUCTURE PLAN – REDUCED SCHEME



SHEET: SPO1

APPENDIX D1

NPDC LAND SUBDIVISION AND DEVELOPMENT STANDARD V3 – DETAIL E11:BI-DIRECTIONAL



APPENDIX D2

NPDC LAND SUBDIVISION AND DEVELOPMENT STANDARD V3 – DETAIL E12

