



# **SmartGrowth Strategy Hearings Panel Deliberations**

Thursday, 29 February and Friday, 1 March 2024 at 9.30am  
Council Chambers, 1484 Cameron Road, Greerton, Tauranga



# SmartGrowth Strategy Hearing Panel Deliberations

## Membership:

<b>Chairperson</b>	Andrew Turner
<b>Members</b>	Matire Duncan John McDonald Deputy Mayor John Scrimgeour Cr Paula Thompson Bill Wasley

## Delegations:

At the Senior Leadership Group meeting on 13 June 2013, the Senior Leadership Group resolved to delegate to the Hearings Panel responsibility to:

- Hear and consider submissions;
- Make recommendations to the SmartGrowth Leadership Group on changes to the Draft SmartGrowth Strategy and decisions in response to the submissions;
- Appoint up to 2 additional panellists with diverse expertise and experience, if considered necessary by the panel.



Notice is hereby given that a SmartGrowth Strategy Hearings Panel Deliberations will be held at Council Chambers, 1484 Cameron Road, Greerton, Tauranga on:  
Thursday, 29 February and Friday 1 March 2024 at 9.30am

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- 1 KARAKIA**
- 2 PRESENT**
- 3 IN ATTENDANCE**
- 4 APOLOGIES**

## 5 REPORTS

### 5.1 DELIBERATIONS ON SUBMISSIONS TO SMARTGROWTH STRATEGY

**File Number:** A5987688

**Author:** Craig Batchelar, Strategic Advisor

**Authoriser:** Andrew Turner, Chairperson SmartGrowth Strategy Hearing Panel Deliberations

#### BACKGROUND

1. In June 2023, the SmartGrowth Leadership Group appointed the Hearings Panel and delegated it the authority to:
  - a) Hear and consider submissions;
  - b) Make recommendations to the SmartGrowth Leadership Group on changes to the Draft SmartGrowth Strategy and decisions in response to the submissions.<sup>1</sup>
2. Hearings of submissions on the Draft SmartGrowth Strategy 2024-2074 (SmartGrowth Strategy) were held on 4 and 5 December 2023. The Hearings Panel heard from 34 submitters.
3. The Hearings Panel must now consider and make recommendations to the SmartGrowth Leadership Group on changes to the Draft SmartGrowth Strategy
4. Decisions on submissions on the Strategy are being made under the Local Government Act 2002 applying the Special Consultative Procedure (SCP), following the consultation period that ran from 18 September to 20 October 2023.
5. Western Bay of Plenty District Council has provided the systems and resources to support Hearings Panel on behalf of the SmartGrowth Partnership.

#### RECOMMENDATION

That the SmartGrowth Hearings Panel:

1. Receives the report from the Strategic Advisor titled 'Deliberations on Submissions to SmartGrowth Strategy 2024-2074'.
2. Receives the written submissions and verbal feedback to the special consultative procedure 18 September to 20 October 2023 for the SmartGrowth Strategy 2024-2074, as set out in Attachment 2-4 to this report.
3. Recommends to the Smart Growth Leadership Group that changes be made to the SmartGrowth Strategy 2024-2074 in accordance with Attachment 9 of the

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<sup>1</sup> Resolution SG23/06.10

report for the reasons set out in the applicable Issues and Options Reports, and subject to any amendments made by the Hearings Panel.

## SUBMISSIONS

6. A full copy of the submissions and a summary of submissions is included as separate document in the Agenda. The Hearings Panel must resolve to receive the submissions.

## HEARINGS

7. Notes from the Hearings on Monday 4 and Tuesday 5 December 2023 are attached as Attachment 4.
8. Following the hearings, the Panel identified several questions/matters for staff to report back on. The status of these questions/matters is set out in the table in Attachment 5. Most of the questions/matter are addressed in the draft Issues and Options Papers (IOPs).

## WORKSHOP

9. The Hearings Panel held an informal workshop on 7 and 8 February.
10. The workshop:
  - c) Considered draft Issues and Options Papers and whether the information being provided by reporting officers would be sufficient and appropriate to support deliberations and recommendations by the Hearings Panel to the SLG;
  - d) Checked that questions and matters for staff to report back on following the hearing had been addressed;
  - e) Confirmed arrangements for a visit to key sites;
  - f) Discussed arrangement for the deliberations meeting.
11. Notes from the pre-deliberations Workshop are included in Attachment 6. These notes have guided officer reporting on submissions.

## SITE VISITS

12. Site visits to inform deliberations took place on Tuesday 20 February.
13. The notes from the site visits are included in Attachment 7.

## ISSUES AND OPTIONS PAPERS

14. To support deliberations on submissions, appointed "Topic Leads" have been evaluating the submissions and preparing Issues and Options Papers (IOPs) for each topic area. This has involved working across the SmartGrowth partnership to

ensure there is awareness of the options being considered and the recommendations being made. Peer reviews of the papers have also been provided across the partnership.

15. IOPs are included as separate document in the Agenda.
16. Topics for the IOPs follow the headings of the SmartGrowth Strategy chapters. The table below identifies the topic, topic lead/s and the issues evaluated in their respective IOP.

Topic	Topic Lead/s	Issues Evaluated in IOP
Areas to be protected and developed carefully	Barbara-Ann Overwater	Limiting growth, providing green corridors, sustainability and resilience Constraining development in areas with natural hazard risk Mitigating coastal inundation and flooding
Tangata whenua	Elva Conroy	Partnership and Participation within SmartGrowth Enabling the Marae as Centres approach
Climate resilience	Manini Abernethy	Managed retreat Emissions reductions targets Climate resilient development Climate change action
Te Taiao – our environment	Barbara-Ann Overwater	Poor air quality Impact of growth on the environment Manage and protect freshwater resources
Rural	Tracey Miller	Ensuring the protection of rural land, in particular highly productive land Looking after rural communities Opportunities for rural residential / lifestyle living A more enabling approach for housing on rural properties
Urban form and centres	Carl Luca	Support for the proposed urban form and centres approach Open space provision

Topic	Topic Lead/s	Issues Evaluated in IOP
		<p>Opposition to the urban form and centres approach</p> <p>Commercial centres</p>
Housing	Simone Cuers	<p>Incorporate sustainability standards in new homes</p> <p>Use inclusionary zoning to achieve housing outcomes</p> <p>Intensification in existing urban areas</p> <p>Role of local government</p> <p>Māori housing</p> <p>Social / community housing</p> <p>Strengthen focus on housing outcomes in the Strategy</p> <p>Develop monitoring and reporting framework for SmartGrowth sub regional Housing Systems Plan</p>
Transport	Sarah Dove/ Peter Siemensa/ Bron Healy/Calum McLean	<p>Passenger rail</p> <p>Improved public transport</p> <p>Investment in transport infrastructure</p> <p>Transport for an aging population and planning for all abilities</p> <p>Infrastructure for walking and cycling</p> <p>Car parking</p> <p>Managed Lanes</p> <p>Resilience</p> <p>Ferries</p> <p>Park and ride facilities and services</p> <p>Emissions and air pollution</p> <p>Miscellaneous</p>
Three waters and other infrastructure	Steve Hurley	<p>Three Waters Reforms</p> <p>Water Supply Analysis and Availability</p> <p>Electricity Generation and Supply</p>

Topic	Topic Lead/s	Issues Evaluated in IOP
Social Infrastructure and well-being	Sonya McCall/Rebecca Gallagher	<p>Planning for people</p> <p>Quality of urban spaces in delivery of Connected Centres</p> <p>Location and use of community centres, halls and marae</p> <p>Coordination of provision of community healthcare and education</p>
Economic wellbeing	Greg Simmons	<p>Environmental sustainability</p> <p>Existing industrial activity</p> <p>Region's role in upper North Island</p> <p>Data source for employment figures</p>
Future Development Strategy	Nichola Lennard/Craig Batchelar	<p>Oppose</p> <p>Infrastructure Readiness</p> <p>Maps</p> <p>Support for the FDS</p> <p>Population Assumptions</p> <p>Settlement Pattern – Changes to Timing:</p> <ul style="list-style-type: none"> <li>• Te Tumu,</li> <li>• Tauriko West</li> <li>• Keenan Rd</li> </ul> <p>Settlement Pattern – Adding Areas:</p> <ul style="list-style-type: none"> <li>• Wairākei South</li> <li>• Tara Rd</li> <li>• Residential growth in the East</li> <li>• Residential growth in Te Puke</li> <li>• Residential growth for Welcome Bay and Upper Ohauiti</li> <li>• Intensification</li> <li>• Staging of Long-term Development in the Eastern Corridor and Western Corridor</li> </ul>

Topic	Topic Lead/s	Issues Evaluated in IOP
		<p>Settlement Pattern – Te Puna and surrounds</p> <p>FDS Implementation Settlement Pattern – Te Puna and surrounds</p> <p>FDS Implementation</p>
Future Development Strategy – Industrial Land Study	David Phizacklea	<p>General – Potential future industrial land areas</p> <p>General – Providing for existing industrial activities</p> <p>Potential Future Business Area – Bell Road/ Wairākei South</p> <p>Potential Future Business Area – Ōmokoroa/Apata</p> <p>Potential Future Business Area – Te Puna</p> <p>Potential Future Business Area – Te Puke</p>
General	Craig Batchelar	<p>Opposition to Strategy</p> <p>Changes to Vision – Contemporary perspectives</p> <p>Changes to Vision – Tāngata Whenua values</p> <p>Objectives, Challenges, Opportunities</p> <p>Transformational Shifts</p> <p>Implementation Plan – specific actions to be included.</p> <p>Consultation &amp; Engagement</p> <p>SmartGrowth Partnership</p> <p>Hamilton to Tauranga Corridor</p>

17. The IOPs have a common structure which includes:

- a) Overview of topic submissions;
- b) Overview of options identified to address topic submissions;
- c) Evaluation of options: advantages, disadvantages, financial and other considerations;



- d) Recommended decisions/reasons, including specific recommendations on amendments to the Strategy.
18. There are inevitable overlaps between some topics. Topic Leads have endeavoured to address these as far as possible.
19. Topic Leads will attend the deliberations meeting where they will present their IOP, identify the key issues, answer questions from the Panel, and assist with formulating recommendations and reasons.

## POLICY CONSIDERATION

20. The development of the Draft Strategy has been informed by assessment against all relevant national, regional and local policy. The policy issues are referenced in the Strategy and detailed in the Background Papers to the Strategy <sup>2</sup>. The IOPs have also been prepared in the context of current policy.
21. Following the hearings of submissions, the Hearings Panel requested that specific consideration be given to the possible implications and risks to the SmartGrowth Strategy following from the recent change in government and policy changes signalled in the Coalition Agreement, and any recent changes to local and regional policy.

### **New Government Policy Change**

22. The report in Attachment 8 identifies relevant policies and assesses potential risks and opportunities arising from these.
23. The implications of policy changes are assessed as presenting low to moderate risk to the Strategy and its implementation:
- Smart Growth Partnership: There is a low risk that the SmartGrowth Partnership will be affected;
  - Resource Management System: There is a low risk that SmartGrowth implementation will be negatively affected by RM systems changes;
  - Housing: There is a moderate risk to SmartGrowth housing policy delivery, principally in relation to reframing policies, and reconciling land zoning and infrastructure provision;
  - Infrastructure: There is a low risk that the SmartGrowth implementation will be negatively affected by the changes in infrastructure policy. The focus on enhanced infrastructure delivery presents more of an opportunity than a threat overall to Strategy implementation;
  - Funding and Financing: There is a low risk that the SmartGrowth implementation will be negatively affected by the changes in funding and financing. The focus on enhanced infrastructure delivery presents more of an opportunity than a threat overall to Strategy implementation;

- Climate Change – Emissions Reduction: There is a moderate risk to the SmartGrowth Strategy principally in relation to work in reframing policies and engagement with the community.

<sup>2</sup> <https://www.smartgrowthbop.org.nz/articles/smartgrowth-strategy-2023-background>

24. Some SmartGrowth partners and stakeholders may have apprehension about the potential for:

- the lowering of environmental bottom lines;
- reduced focus on intensification of existing urban areas;
- reduced local participation in decision-making on major infrastructure projects;
- reduced focus on emissions reduction.

which may affect decision making and relationships.

25. The policy changes identified below will need to be monitored and addressed as their implications become clearer over the next few months.

26. There is no obvious case for deferring deliberations on submissions at this stage.

#### **BOPRC Plan Change 6 to the Regional Policy Statement**

27. Under the NPS-UD BOPRC are required to:

- Take into account Te Tiriti o Waitangi principles;
- Provide criteria for assessing private plan changes for “unanticipated or out of sequence urban development proposals for urban environments”;
- Enable intensification of urban environments.

28. Bay of Plenty Regional Council has made its decision to accept recommendations made by the Hearing Panel on submissions to Proposed Change 6 (NPS-UD) to the Regional Policy Statement. The decisions will be released on 12 February 2024 and from this date the change is amended in accordance with those decisions.

29. The former “urban limits” have been removed from the RPS. Criteria are provided for assessing the merits of Private plan changes, submissions on plan changes, or submissions on plan reviews that propose unanticipated or out of sequence urban development.

30. “Unanticipated or out of sequence urban development” is development not provided for in an adopted local authority Future Development Strategy, growth strategy, RMA plan, Long Term Plan, or 30-year infrastructure strategy. Out of sequence development is development that is not consistent with the development sequence set out in one or more of those documents.

31. The Strategy and FDS will play a pivotal role in the implementation of this new policy.

32. The recommendations on the Draft strategy are unchanged as a consequence of the above policy considerations.

### **MDRS Plan Changes**

33. Plan Changes 33 and 92 seek to implement the MDR for TCC and WBOPDC respectively.
34. Both plan changes seek to give effect to Strategy objectives and directives for urban intensification. As referred to in several of the IOPs, this is an entirely separate statutory process that is well advanced. Submissions on the Strategy have no bearing on the Plan Changes. The recommendations on the Draft strategy are unchanged as a consequence.
35. Changes to the RMA are proposed in the Coalition Agreement to enable Councils to opt-out of the MDRS, with the need for councils to ratify any use of MDRS, including existing zones. The timing for this is unknown. The government needs to pass legislation and that hasn't been introduced yet, and the ramifications of scope and timing are not known.

### **RECOMMENDED AMENDMENTS TO DRAFT STRATEGY**

36. In overview, the officer recommendations do not propose fundamental changes to the Strategy and FDS.
37. The Urban Form and Centres IOP gives an account of the evolution of the draft Strategy. The strategic approach to growth builds on the SmartGrowth Strategy 2013 approach and 2018 Future Development Strategy, both of which included full public consultation. These were premised on provision of greenfield Urban Growth Areas and the need to encourage a more compact urban form, with this approach remaining consistent through the Urban Form and Transport Initiative (refer below) and the current draft Strategy.
38. Notwithstanding, the current draft Strategy also responds to relevant changes (e.g., central government policy, market maturity in delivering higher density, and so forth) that continue to occur over time and influence implementation of the strategic outcomes.
39. Recommended amendments to Draft SmartGrowth Strategy from the IOPS are collated into the table in Attachment 9.
40. The most significant recommended changes to the Strategy are highlighted as:
- a) FDS:

- i. amending the housing allocation table to comply with the NPS UD by indicating that both the Eastern Centre and Upper Belk Road in the Western Corridor may need to be brought forward if other areas are delayed (1,000 – 4,000 houses added for each area);
    - ii. highlighting the intention to achieve compact urban form through the Connected Centres Development Strategy targeting at least 40% of new housing through intensification and infill over time;
    - iii. Confirming that Te Tumu remains a high priority growth area for the SmartGrowth Strategy.
  - b) Te Taiao –Environment: Addressing air quality as a key issue for environmental management;
  - c) Three waters and infrastructure: Amending the Strategy and FDS text to incorporate distribution and transmission capacity with planned network expansion.
41. Other recommended changes recognise and respond to the submitter issues and concerns through further explanation and clarification in the Strategy document.
42. Several submitters have requested changes that relate more to implementation than strategy and, where supported, these matters have been directed towards the Implementation and Funding Plan for more detailed consideration (See following report section).
43. It is suggested that preliminary recommendations on submissions be made following each IOP presentation, with final recommendations at the conclusion of the meeting to ensure that any consequential or further changes can be made. The IOPs contain draft recommendations and reasons.
44. A draft schedule is included in Attachment 9 and contains the Strategy amendments recommended in the IOPs.

### SMARTGROWTH IMPLEMENTATION AND FUNDING PLAN

45. Matters recommended in the IOPs as actions for the Implementation and Funding Plan are included in Attachment 10.
46. The most significant actions for the Implementation and Funding Plan are:
- a) Tāngata Whenua: future support and resourcing of tāngata whenua in the Marae as Centres programme.
  - b) Urban Form and Centres: working with partners and key stakeholders, prepare and implement a Commercial Centres Hierarchy for the sub-region, to assist in future planning and decision making.
  - c) Housing: develop monitoring and reporting framework for SmartGrowth sub regional Housing Systems Plan

- d) Transport:
    - i. Undertake a Regional Passenger Rail Futureproofing, study, in collaboration with Kiwirail, using the existing railway network and subject to its results, prepare an investment plan to secure strategic land parcels to not make passenger rail impossible in future
    - ii. Undertake a joint business case for inter-regional rail with the Waikato RC, in collaboration with Kiwirail, using the existing railway network
  - e) FDS:
    - i. Include the Western Corridor as a Priority Development Area.
    - ii. Defer the consideration of Wairākei South and Tara Road for urban development and in the first instance, to consider catchment management options to manage natural hazard risk and ecology and water quality effects in the wider catchment including the Kaituna River.
  - f) General: Consider the following options in a review of SG delivery following strategy adoption in consultation with stakeholders:
    - a. Membership of the SmartGrowth Leadership Group
    - b. Re-establishment of the SmartGrowth Forums or alternative methods of engagement
47. The table provides only the initial scope. Additional information will be required if these matters are taken forward including lead agency, timeframe, costs and other attributes as previously reported to SLG.
48. The Implementation and Funding Plan will be developed and remain in draft until all SG partners have completed their decision making on LTPs (formal approval late September 2024).
49. Attachment 10 does not require adoption by the Panel but should be noted and provided as supporting information to the 23 April SLG meeting.

### RECOMMENDATIONS TO SLG

50. The Panel recommendations on amendments to the Strategy will be reported to the SmartGrowth Leadership Group for approval on 23 April 2024. The SLG meeting was moved out from 21 March 2024 to accommodate SLG attendance by all Hearings Panel members.
51. The Hearings Panel recommendations on amendments to the SmartGrowth Strategy will be captured in a schedule and will be shown in a “Redline” version of the Strategy. The Schedule and Redline version of the Strategy will form part of the Hearings Panel recommendations to the SLG, supported by a recommendations and reasons document.

52. The intention is to release the SLG agenda 10 working days prior to the meeting to provide sufficient time for partners to review and consider the recommendations and, if necessary, to seek further information.
53. Approval of the Strategy is likely to be the only item on the SLG meeting agenda in April.
54. Should the SLG decide that it does not support recommendations from the Hearing Panel, and the matters can't be resolved within the SLG meeting, the appropriate response will be to refer the matters back to the Hearings Panel for reconsideration.
55. Approval of the Strategy by the SmartGrowth Leadership Group will be referred to the SG partners for endorsement in accordance with each of the partners specific mandates.

## ATTACHMENTS

1. **Issues and Options Papers**  
2. **Full Submission**  
3. **Summary of Submissions**  
4. **SmartGrowth Hearing Notes – 4th & 5th December 2023**  
5. **Questions from hearing report**  
6. **Pre-deliberation workshop notes – 7th & 8th February 2024**  
7. **Site visit report 20th February 2024**  
8. **CG Policy Considerations**  
9. **Recommended amendments to Draft SmartGrowth Strategy**  
10. **Recommended actions for implementation and funding plan – Initial scope**  

Sensitivity: General

**SmartGrowth Strategy 2023–2073**  
**ISSUES AND OPTIONS PAPER**  
**Areas to be Protected and Developed Carefully**  
**Author: Barbara–Ann Overwater**

<b>Topic</b>	Areas to be Protected and Developed Carefully – (Part 3, The Spatial Plan, Chapter 01)
<b>Issues</b>	<ol style="list-style-type: none"> <li>1. Limiting growth, providing green corridors, sustainability and resilience.</li> <li>2. Constraining development in areas with natural hazard risk</li> <li>3. Mitigating coastal inundation and flooding</li> </ol>

**Staff Narrative****Overview of feedback received**

Overall, 13 submission points were coded to Areas to be Protected and Developed Carefully arising from 10 submitters:

Pirere, Tania – submitter 17

Richard, N/A – submitter 27

Ministry Of Education – submitter 59

Nga Potiki a Tamapahore Trust – submitter 72

Wallen, Bruce – submitter 30

Sadler, Jon – submitter 46

Fitter, Julian Richmond – submitter 47

Bowden, Beth Willard – submitter 53

Robson, John –submitter 54

Waste Management NZ Ltd –submitter 74

Three submitters (Sub I.D #72, #59, #74) generally support the approach to protect and avoid specific areas and the precautionary approach to growth in areas with natural hazard susceptibility and other land constraints. Submitter I.D #54 generally opposes the chapter.

Submitter I.D #72 expressed support for adopting maps 1, 2, 2a, 2b in relation to its land located at Tara Road, Pāpāmoa. The submitter acknowledged that there are some constraints on its site and acknowledge the go carefully approach in relation to Highly Productive Land and flooding constraint/hazard layers.

Submitter I.D #59 are also in support of the overall approach to direct development away from areas where there are significant constraints to development or intrinsic environmental and cultural attributes that must be protected from future land development. The precautionary approach to growth in areas with natural hazard susceptibility and other land constraints is also supported.

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Sensitivity: General

Submitter I.D #74 are generally supportive of the approach to avoid areas with high natural hazard risk, however also note that there are a range of existing incentives on landowners and infrastructure providers to ensure that any future development occurs in a way that appropriately manages those natural hazard risks.

**There are three key issues arising out of the submissions set out for the Panel's consideration:**

**Issue 1: Limiting growth and providing green corridors, sustainability and resilience**

Submitter I.D #27 promotes Tauranga to become a sponge city with room for rivers and wetlands to take sediment, houses to be built with a view to 100 years, and corridors of vegetations linked together to provide a larger area for native animals.

Submitter I.D #17 submits that the whole of Maketū should be protected from further growth.

Submitter I.D #53 notes from the maps that all the 'easy land' is already in use. Geography has already imposed a limit to growth and therefore Growth Directives on page 51 seen mis-titled.

Submitter I.D #46 submits that there seems a fundamental assumption amongst policy makers and planners in Tauranga that a large majority of people want growth. They don't. Growth in Tauranga doesn't mean per capita increase in wealth and well-being. Resilient and sustainable places require green corridors and belts, and a focus on environmental and sustainable resource design and build, with pre-planned associated roads and infrastructure.

Submitter I.D #47 submits that the title 'Areas to be Protected and Developed Carefully' does not make sense. If an area is to be protected, it should not be developed at all! This submitter states that any development needs to be done carefully, and the alternative is unthinkable.

**Issue 2: Constraining development in areas with natural hazard risk**

Submitter I.D #74 consider the approach to 'blacklisting' areas that could potentially be developed, subject to appropriate natural hazard mitigation, is overly blunt especially when an appropriate engineering solution could be put in place that appropriately manages the risk. The submitter contends that the shortfall of existing industrial zoned land in the sub-region will require a pragmatic approach. The submitter requests inclusion of consideration of other incentives on landowners and infrastructure providers to provide for high quality developments that address, manage, and mitigate hazards.

Submitter I.D #74 consider it is critical the strategy does not unnecessarily constrain development and land use of its sites particularly where other alternatives are available to manage those natural hazard risks.

**Issue 3: Coastal inundation and flooding**

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Sensitivity: General

Submitter I.D #30 has stated sea level rise with subsequent inundation of Papamoa and the Mount are likely in the future either from rising groundwater tables levels or flooding by runoff to low lying areas, and possibly tsunamis. The submitter suggests the inclusion of building restrictions (setbacks) for coastal areas that restrict use of low lying or flat land is requested.

#### **Key considerations**

- The extent to which the strategy has addressed balancing growth with sustainability.
- The approach taken to identify areas to be developed carefully and any further considerations needed to address, manage and mitigate natural hazard risk.
- The extent to which the strategy can provide direction for coastal inundation and flooding measures.

The SmartGrowth background papers should also be referred to:

- SmartGrowth Strategy Areas to be protected and developed carefully background paper (September 2023)

There are three key issues set out for the Panel's consideration. The practicable options in relation to these issues are set out below.

#### **Options overview**

##### **Issue 1: Limiting growth and providing green corridors, sustainability, and resilience.**

##### **How the draft SmartGrowth Strategy currently addresses the issue, directly or indirectly:**

- Part 1: Introduction and Context – Objectives and Transformational shifts
- Part 2: The Growth Challenge – Challenges and opportunities
- Part 3: Chapter 01 Areas to be Protected and Developed Carefully- Introduction (page 48)
- Part 3: Chapter 01 Areas to be Protected and Developed Carefully – Key challenges (page 50)
- Part 3: Chapter 01 Areas to be Protected and Developed Carefully –Growth Directives 1, 2, 3 (page 51)
- Part 3: Chapter 01 Areas to be protected and developed carefully – Integration box (page 51).
- Part 3: Chapter 01 Map 1 – Areas to protect and avoid (page 53)
- Part 3: Chapter 01 Map 2 – Go Carefully – Precautionary approach to growth (page 54)
- Part 3: Chapter 02 Tangata Whenua challenges – (page 62) Cumulative and potentially irreparable impact of uncontrolled urban development on the natural environment.
- Part 3: Chapter 03 Climate Resilience – Climate Resilient Development Principles (page 67)
- Part 3: Chapter 03 Climate Resilience – Key challenges (page 74-76)
- Part 3: Chapter 04 Te Taiao-Our Environment – Key challenges (page 84)
- Part 3: Chapter 04 Te Taiao-Our Environment – Growth Directives (page 85)
- Part 3: Chapter 09 Three Waters and other Infrastructure Growth Directives (page 125)

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Sensitivity: General

<ul style="list-style-type: none"> <li>Part 3: Chapter 05 Rural – Introduction (page 91)</li> </ul>	
Option 1A	Note the submissions and make no changes
Option 1B (Recommended)	<p>Provide additional text to highlight the benefits of protecting ecosystems and their services and prioritising ecological health in development.</p> <p>Include an additional case study to highlight the protected status of the Kaimai Mamaku Forest Park.</p>
<p><b>Issue 2: Constraining development in areas with natural hazard risk</b></p> <p><b>How the draft SmartGrowth Strategy currently addresses the issue, directly or indirectly:</b></p> <ul style="list-style-type: none"> <li>Part 3: Chapter 01- Areas to be Protected and Developed Carefully – Background section. Reference to the SmartGrowth Partners collaborative natural hazard programme and ongoing collection of new data and updating existing natural hazard mapping.</li> <li>Part 3: Chapter 01- Areas to be Protected and Developed Carefully – Key challenges – No. 2 Natural Hazards will be exacerbated by climate change; No.3 Providing housing and infrastructure for a growing population while reducing the exposure and vulnerability of development.</li> <li>Part 3: Chapter 01- Areas to be Protected and Developed Carefully – Growth directive 3 – Take a precautionary approach to development in areas identified as ‘go carefully’.</li> <li>Part 3: Chapter 01: Areas to be Protected and Developed Carefully Map 2 – Go Carefully – <i>Precautionary approach to growth.</i></li> </ul>	
Option 2A	Note the submission and make no changes
Option 2B (Recommended)	<p>Provide additional text to clarify that the maps included are at a high-level sub-regional scale for spatial planning purposes only and may be subject to change through other processes (such as more detailed hazard mapping).</p> <p>Include text which highlights that site-specific constraints and features to protect are managed and assessed through City and district planning rules.</p>
<p><b>Issue 3: Mitigating coastal inundation and flooding.</b></p> <p><b>How the draft SmartGrowth Strategy currently addresses the issue, directly or indirectly:</b></p> <ul style="list-style-type: none"> <li>Part 3: Chapter 01- Areas to be Protected and developed carefully. Reference to natural hazards within ‘Background’ section. Reference to the SmartGrowth Councils collaborative natural hazard programme and ongoing collection of new data and updating existing natural hazard mapping (page</li> <li>Part 3: Chapter 01- Areas to be Protected and developed carefully – Key challenges – No.2 Natural Hazards will be exacerbated by climate change; No.3 Providing housing and infrastructure for a growing population while reducing the exposure and vulnerability of development; No.5 Cost of making our communities and infrastructure more resilient (page 50-51).</li> </ul>	

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Sensitivity: General

- Part 3: Chapter 01- Areas to be Protected and developed carefully -Map 2 – ‘Go Carefully’ – *Flooding*. Layers includes coastal inundation and flooding (NB urban area layer covers the Pāpāmoa coastline) (page 54)
- Part 3: Chapter 03 – Climate Resilience- Map 5 – *Areas at Risk from Climate Change* (page 79)
- Part 3: Chapter 01- Areas to be Protected and developed carefully – Growth directive 3 – Take a precautionary approach to development in areas identified as ‘go carefully’ (page 51)
- Part 3: Chapter 03 Climate Resilience – Climate resilience key challenges – 3, 7 (page 74-75)
- Part 3: Chapter 03 Climate Resilience –Figure 18 – Snapshot of climate change risk to Tauranga City (72)
- Part 3: Chapter 03 Climate Resilience – Regional, sub-regional and district responses (page 73)

Option 3A

(Recommended)

Note the submission and make no changes

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Sensitivity: General

<b>Issue 1: Limiting growth and providing green corridors, sustainability, and resilience.</b>	
<b>Option 1A: Note the submission and make no changes</b>	
<b>Not Recommended</b>	
<p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>Chapter 01 has identified those areas where new development should not occur due to critical constraints and where there are intrinsic environmental, cultural and heritage attributes. The draft strategy has also identified areas where there is natural hazard susceptibility and other land constraints and directs growth away from these areas unless it can be demonstrated that the issues can be managed with risk mitigated to acceptable levels. This approach identifies that there is already a limit to growth in areas of the sub-region. The identification of “areas to protect” (and avoid) and “areas to develop carefully” is vital to the spatial planning process as it provides an understanding of where future investment and land development should be avoided, as well as where it may be appropriate.</li> <li>The Chapter 01 Key Challenges section addresses the importance of creating resilient communities, buildings, and infrastructure.</li> </ul>	<p><b>Disadvantages</b></p> <ul style="list-style-type: none"> <li>Some of the submissions have focused on sustainable and resilient places and there is an opportunity to include supplementary text in Chapter 01 to further highlight the benefits of protecting ecosystems and their services and prioritising ecological health in development.</li> </ul>
<ul style="list-style-type: none"> <li>Part 3: Chapter 04 Te Taiao – Our Environment’ addresses the issues arising from the submission points, with references to:             <ul style="list-style-type: none"> <li>Integration of the principle of Ngā Wai ki Mauao me Maketū (fundamental principle outlined on page 80/81) with other key topics in the strategy.</li> <li>Reference to the methods of water sensitive urban design, low impact design, and integrated catchment planning to promote clean and sustainable water outcomes.</li> <li>improving access to open space and green space to provide a sponge for rainfall infiltration and for people’s mental health and social well-being of the community.</li> </ul> </li> </ul>	

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<ul style="list-style-type: none"><li>- Development of an interconnected network of open spaces, reserves and ecological corridors.</li><li>- Growth of the western Bay of Plenty is within environmental limits.</li></ul>	
<b>Financial implications</b>	
N/A	
<b>Other considerations</b>	
<b>Option 1B: (Recommended)</b>	
<ul style="list-style-type: none"><li>• Provide additional text in Part 3: Chapter 01 Areas to be protected and developed carefully as follows:<ul style="list-style-type: none"><li>i. Include text in the introduction (paragraph 2) to add a description of the benefits of protecting ecosystems, as follows: There is a scarcity of indigenous ecosystems, and it is important that existing ecosystems are protected. <u>The ecological health of the natural environment plays a critical role in the functionality of urban spaces and the quality of life within them. In addition to the intrinsic value of these ecosystems, they provide important habitat for threatened, at risk and taonga species, help regulate climate stressors, improve resilience and well-being, and enable customary practices.</u> People should also continue to have opportunities to readily access high quality natural environments in urban areas, such as parks and reserves, to enjoy the broad range of environmental and social benefits they offer.</li><li>ii. Include additional text in <i>Key challenges #1. Pressures on the natural and cultural environment</i> as follows: The subregion faces some long-term environmental challenges including declining water quality, degradation of the local environment and alteration of natural ecosystems. These challenges are likely to be exacerbated by population and economic growth as well as the impact of climate change in the long-term. We will need to respond proactively to challenges faced, enabling protection and enhancement and restoration of areas including environmental and cultural assets along with avoiding development in higher risk or constrained locations. <u>In continuing to foster economic growth and development we will need to ensure that natural assets continue to provide the critical resources and environmental services on which our well-being relies.</u></li></ul></li></ul>	

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iii. Include an additional case study to highlight the protected status of the Kaimai Mamaku Forest Park which is a taonga, connecting two regions, numerous iwi and hapū, conservation and recreation groups and livelihoods. Outline the importance of maintaining a healthy and functioning ecosystem.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>• Would reinforce the reasons for continuing to protect areas from development and place further importance on the critical role of the natural environment, and its environmental attributes and services, in contributing to the achievement of a well-functioning urban environment.</li> <li>• A new case study highlighting the Kaimai Mamaku Forest Park would add value to the chapter by providing a counterbalance to the case study on the Tauranga Infrastructure Resilience Programme (page 51), ensuring both the 'areas to protect' and 'areas to develop carefully' components are fully represented in the strategy.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>• Additional text could be considered unnecessary.</li> </ul>
<b>Financial implications</b>	
N/A	
<b>Other considerations</b>	
<b>Issue 2: Constraining development in areas with natural hazard risk</b>	
<b>Option 2A:</b> Note the submission and make no changes <b>Not Recommended</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>• Map 2 'Go Carefully- Precautionary approach to growth' provides a collective view of the areas that may have constraints to growth to help inform the preferred growth direction, at a high spatial level, for the western Bay of Plenty sub-region.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>• The chapter does not currently make it clear that the SmartGrowth Strategy is not an RMA planning document and future development at a site-specific scale is assessed and managed through City and District Plans. However, this is clear in the Implementation Chapter.</li> </ul>

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<ul style="list-style-type: none"> <li>• The chapter already explains that areas with natural hazard susceptibility and other land constraints have been identified and mapped to direct growth away from these areas unless it can be demonstrated that the issues can be managed with risk mitigated to acceptable levels.</li> <li>• Potential development opportunities within the areas with 'go carefully' layers remain unchanged as the SmartGrowth Strategy is not an RMA planning document. Development is managed through the Regional Policy Statement, and City and District Plans. The weight to be given to the final SmartGrowth Strategy in decision making will be 'have regard to'. Current and future plans implementing the SmartGrowth Strategy will consider greater or less \ control on development is required in the areas identified in Map 2.</li> </ul>	
<b>Financial implications</b>	
N/A	
<b>Other considerations</b>	
<p>As well as understanding areas where it may be appropriate to develop we also need to understand areas where there are risks and where development may not be appropriate. There are some areas which may be exposed to hazard risks – such as geohazards, flooding, coastal erosion, and inundation – to the extent that future risk must be avoided and development potentially curtailed.</p> <p>The submitter considers that the strategy must not unnecessarily constrain development, particularly where there are other alternatives to manage natural hazard risks. However, a constraint, such as a natural hazard for example does not automatically indicate a high level of exposure to risk. In many cases the level of risk to life or property associated with the hazard constraint is relatively low and could be adequately managed through design and engineering solutions.</p>	
<p><b>Option 2B: (Recommended)</b></p> <ul style="list-style-type: none"> <li>• Provide additional text in Chapter 01 Areas to be protected and developed carefully – 'Introduction', after paragraph 6 as follows :</li> </ul> <p>i. <u>The maps included are presented at a high-level sub-regional scale for spatial planning purposes only and may be subject to change through other processes (such as updates to hazard mapping). Site-specific constraints and features to protect are</u></p>	

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<u>managed and assessed through Regional and District planning policies and rules, and other statutory procedures such as LIMs and Building consents.</u>	
<b>Advantages</b> <ul style="list-style-type: none"><li>Inserting additional text to clarify the status of the maps will help remove any ambiguity. The maps also do not 'lock in' direction as subsequent RMA processes, whilst having regard to the SmartGrowth Strategy, will require more detailed analysis to be undertaken with more detailed information provided to consider site-specific conditions.</li></ul>	<b>Disadvantages</b> <ul style="list-style-type: none"><li>None</li></ul>
<b>Financial implications</b>	
N/A	
<b>Other considerations</b>	
<p>The Chapter 01 Areas to be protected and developed carefully maps show the environmental, cultural and heritage attributes, natural hazards, and other land use considerations in the western Bay of Plenty. These have been informed by established policy direction and various technical studies. Individual GIS map layers have been grouped by category (No-Go, Go Carefully) and by sub-categories. Maps have been prepared at the level of these eight subcategories for the Go Carefully layers. The No-Go and Go Carefully GIS map layers have been aggregated upwards to create two composite maps to show the No-Go and Go Carefully areas. Layering all the No-Go and Go Carefully layers on top of each other highlights the most constrained areas of the sub-region and forms the basis of assessment of specific locations for growth. It will be up to the proponent of any plan change or resource consent to provide information that demonstrates the effects of natural hazards can be avoided or mitigated.</p>	
<b>Issue 3: Mitigating coastal inundation and flooding</b>	
<b>Option 3A: Note the submission and make no changes (Recommended)</b>	

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<b>Advantages</b> <ul style="list-style-type: none"><li>• The draft SmartGrowth Strategy must spatially identify the broad locations in which development capacity will be provided over the long term, the development infrastructure and additional infrastructure required to support or service that development capacity, and any constraints on development. City and District Plans are statutory documents required by the Resource Management Act and will be the main regulatory tool for implementing the strategy, setting out the policy and rule framework. The submitters request to consider more building restrictions for coastal areas where there is a risk of coastal inundation would need to be considered as part of a Tauranga City Plan and Western Bay of Plenty District Plan review.</li><li>• Chapter 01 Map 2a <i>-Go Carefully Flooding</i> along with Chapter 03 Map 5 <i>'Areas at Risk from Climate Change</i> identify areas at risk from coastal inundation and flooding. The councils continue to collect new data and update existing natural hazard mapping on a rolling basis to ensure it covers the whole sub-region, incorporates updates in scientific knowledge, guidelines, legislation, and responds to updated climate change projections.</li><li>• Chapter 01 'Areas to be protected and developed carefully' along with Chapter 03 'Climate Resilience' provide acknowledgement of the challenge of natural hazards being exacerbated by climate change, citing coastal inundation as a hazard. Chapter 01 Key Challenges notes that it will be important to continue to manage natural hazard risks including updating hazard mapping over time, considering future plan changes, infrastructure resilience planning and community based adaptation planning where appropriate.</li></ul>	<b>Disadvantages</b> <ul style="list-style-type: none"><li>• None.</li></ul>
<b>Financial implications</b>	
N/A	

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**Other considerations**

The 'Areas to be Protected and Developed Carefully' Chapter background paper (September 2023) notes that the Regional Policy Statement (RPS) natural hazards provisions guide those preparing regional, city and district plans and resource consent applications in managing land use and associated activities according to their level of natural hazard risk. The provisions of the RPS require a "risk-based approach" be taken to the management of natural hazards across the region. The effects of climate change on natural hazards are also fully considered in accordance with the natural hazards framework established under the RPS for the planned urban growth areas.

In recent years, the Bay of Plenty Regional Council and partner councils, Tauranga City Council and Western Bay of Plenty District Council, have updated a range of hazard information and datasets to inform the City and District Plan Review processes. Although the councils actively plan for and manage natural hazard risks, it is acknowledged that climate change is increasing the susceptibility and scale of hazards such as coastal inundation, rising groundwater levels, and flooding. It will be important to continue to manage natural hazard risks including updating hazard mapping and land use planning provisions over time, infrastructure resilience planning and community-based climate adaptation planning where appropriate.

Bay of Plenty Regional Council is working with communities towards long term adaptive planning for sea level rise and coastal hazards, following the Ministry for the Environment's 2017 Coastal Hazards and Climate Change Guidance. These work programmes include gathering technical information, understanding what community values may be affected, assessing vulnerabilities and risks, and starting to identify options to address the impacts from sea level rise and coastal hazards. The outputs of this work will be used to inform a range of Council functions including land use planning, building consenting, asset management, and civil defence and emergency management. Bay of Plenty Regional Council also commissioned a climate change risk assessment to identify potential impacts and highlights where actions need to be focused to ensure well informed decisions are made.

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Recommended Decision
<b>Issue 1: Limiting growth and providing green corridors, sustainability, and resilience.</b>
<p><b>Option 1B:</b></p> <p>Provide additional text in Part 3: Chapter 01 <i>Areas to be protected and developed carefully</i> as follows:</p> <ul style="list-style-type: none"> <li>• Include text in the introduction (paragraph 2) to add a description of the benefits of protecting ecosystems, as follows: There is a scarcity of indigenous ecosystems, and it is important that existing ecosystems are protected. <u>The ecological health of the natural environment plays a critical role in the functionality of urban spaces and the quality of life within them. In addition to the intrinsic value of these ecosystems, they provide important habitat for threatened, at risk and taonga species, help regulate climate stressors, improve resilience and well-being, and enable customary practices.</u> People should also continue to have opportunities to readily access high quality natural environments in urban areas, such as parks and reserves, to enjoy the broad range of environmental and social benefits they offer.</li> <li>• Include additional text in <i>Key challenges #1. Pressures on the natural and cultural environment</i> as follows: The subregion faces some long-term environmental challenges including declining water quality, degradation of the local environment and alteration of natural ecosystems. These challenges are likely to be exacerbated by population and economic growth as well as the impact of climate change in the long-term. We will need to respond proactively to challenges faced, enabling protection and enhancement and restoration of areas including environmental and cultural assets along with avoiding development in higher risk or constrained locations. <u>In continuing to foster economic growth and development we will need to ensure that natural assets continue to provide the critical resources and environmental services on which are well-being relies.</u></li> <li>• Include an additional case study to highlight the protected status of the Kaimai Mamaku Forest Park, which is a taonga, connecting two regions, numerous iwi and hapū, conservation and recreation groups and livelihoods. Outline the importance of maintaining a healthy and functioning ecosystem.</li> </ul> <p>Reasons for recommendation:</p> <ul style="list-style-type: none"> <li>• Some of the submissions have focused on the importance of creating sustainable and resilient places and whilst Chapter 04 –Te Taiao Environment covers the aspirations for protecting and enhancing the environment including using nature-based solutions, it is considered that there is merit in including supplementary text in the Chapter 01 Introduction and Key Challenges sections. This will be to highlight the critical role of the natural environment, and its environmental attributes</li> </ul>

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<p>and services, in contributing to the achievement of a well-functioning urban environment.</p> <ul style="list-style-type: none"> <li>• Including an additional case study in this chapter would add value by providing a counterbalance to the case study on the Tauranga Infrastructure Resilience Programme (page 51), ensuring both the 'areas to protect' and 'areas to develop carefully' components of the chapter are fully represented in the chapter.</li> </ul>
<p><b>Issue 2: Constraining development in areas with natural hazard risk</b></p>
<p><b>Option 2B:</b></p> <p>Provide additional text in Part 3: Chapter 01 Areas to be protected and developed carefully 'Introduction' after paragraph 6 as follows:</p> <ul style="list-style-type: none"> <li>• The maps included are presented at a high-level sub-regional scale for spatial planning purposes only and may be subject to change through other processes (such as updates to hazard mapping). Site-specific constraints and features to protect are managed and assessed through Regional and District planning policies and rules, and other statutory procedures such as Land Information Memoranda and Building Consents.</li> </ul> <p>Reasons for recommendation:</p> <ul style="list-style-type: none"> <li>• Inserting additional text to clarify the status of the maps will help remove any ambiguity and help to reinforce that the maps are at a sub-regional scale. The maps also do not 'lock in' direction as subsequent RMA processes, whilst having regard to the SmartGrowth Strategy, will require more detailed analysis to be undertaken with more detailed information provided to consider site-specific conditions.</li> </ul>
<p><b>Issue 3: Mitigating coastal inundation and flooding</b></p>
<p><b>Option 3A:</b></p> <p>Note the submission and make no changes.</p> <p>Reasons for recommendation:</p> <ul style="list-style-type: none"> <li>• The Strategy includes identification of areas at risk from coastal inundation and flooding in Chapter 01 Map 2a and Chapter 03 Map 5. Chapter 01 and Chapter 03 also provide acknowledgement of the challenge of natural hazards being exacerbated by climate change, citing coastal inundation as a hazard.</li> <li>• The SmartGrowth Strategy is not a RMA document and the submitters request to consider new building restrictions for coastal areas would need to be considered as part of a Tauranga City Plan and Western Bay of Plenty District Plan review.</li> </ul>

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<b>Decision</b>
<i>(To be completed in the decision-making meeting)</i>
<b>Reason</b>
<i>(To be completed in the decision-making meeting)</i>

**Date approved:**  
**Approved by:**

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Sensitivity: General

# SmartGrowth Strategy 2023–2073

## ISSUES AND OPTIONS PAPER

### Tāngata Whenua

**Author: Elva Conroy**

<b>Topic</b>	Section 2: Tāngata Whenua
<b>Issues</b>	<ol style="list-style-type: none"> <li>1. Partnership and Participation within SmartGrowth</li> <li>2. Enabling the Marae as Centres approach</li> </ol>

#### Staff Narrative

*It is important to highlight that matters of significance to tāngata whenua are not limited to this particular section of the Strategy. Topic specific matters such as housing and papakāinga, freshwater and values are covered in other Issues and Options Papers.*

#### Overview of feedback received

Tāngata whenua have submitted on a broad range of issues that overlap with other SmartGrowth topics and chapters including Housing, Te Taiao, Climate resilience, Rural, Future Development Strategy and General matters.

5 of the 10 iwi, hapū and Māori Land Trust entities presented their submissions during the hearings.

#### **Issue 1: Partnership and Participation within SmartGrowth**

Several of submissions highlighted key tāngata whenua matters relating to Partnership and Participation in relation to the draft Strategy and engagement with SmartGrowth as a whole:

- a) The voice and cultural identity of tāngata whenua are essential within SmartGrowth.
- b) Concerns about the adequacy of tāngata whenua consultation on the draft Strategy.
- c) Tāngata whenua confirm the importance of seeking the balance between protection and development within their traditional rohe (area), whenua Māori (land), marae and papakāinga, the effects on te taiao (environment), climate resilience, wai Māori (freshwater), as well as heritage identity and management.
- d) Capacity to respond to tāngata whenua future growth management needs and aspirations are limited within hapū and iwi to participate in a meaningful way on the draft Strategy, let alone within SmartGrowth.
- e) Engagement fatigue is a very real issue facing hapū and Māori land trust representatives.
- f) Lack of effective engagement with tāngata whenua outside of the Combined Tāngata Whenua Forum (CTWF).
- g) Importance of supporting capacity and capability building within tāngata whenua to ensure that Strategy implementation is successful and long-lasting.

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At the hearing, a number of submitters acknowledged the efforts of Tū Pakari advisors to support tāngata whenua engagement on the draft Strategy.

Given the recent changes in government priorities, it is anticipated that CTWF members will want to discuss ways to ensure Treaty based partnership models are explored and discussed within SmartGrowth. This will need to be carefully guided by Tū Pakari advisors and specialist staff/teams within Councils and Central Government Agencies.

### **Issue 2: Enabling the Marae as Centres approach**

A number of submissions supported the Marae as Centres approach as it:

- recognises the role and importance of marae as a central focal point for whānau members and the surrounding community as a place of gathering or refuge for community meetings, events and civil defence emergencies.
- enables the co-location of papakāinga, kohanga reo (early childhood facilities) and hauora (health care) facilities for communities that need it the most.
- enables resilience planning for those marae that are located in coastal areas and/or areas prone to flooding.
- empowers and uplifts hapū, marae communities and their whānau through mana motuhake (self-determination) and resilience building.

However, this programme needs to be adequately funded and coordinated. Opportunities should also be pursued to build tāngata whenua capacity and capability so that the programme results in positive, tangible and long-lasting outcomes for all involved.

One submitter suggested that marae need to be specifically provided for within new development areas.

### **Options Overview**

#### **Issue 1: Partnerships and Participation within SmartGrowth**

No specific content changes are suggested for the Strategy. Nevertheless, the hearing panel will need to consider the extent to which strategy implementation and wider systems and processes within SmartGrowth ensure a meaningful partnership with, and active participation by, tāngata whenua.

Option 1A  
(recommended)

**Note the submissions and make no changes to Strategy content. Nevertheless, review and improve the way the SmartGrowth partners work with hapū, marae, iwi and Māori communities to achieve SmartGrowth outcomes.**

Work with the CTWF (and their respective hapū and iwi) to identify improvements within SmartGrowth systems and processes to:

- Ensure the voice of tāngata whenua is heard within SmartGrowth.
- Ensure a meaningful partnership with tāngata whenua.
- Improve communication and engagement with tāngata whenua on SmartGrowth projects and decisions.

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	<p>d) Empower hapū and iwi to be more actively involved with SmartGrowth projects, particularly the Marae as Centres Programme.</p> <p>e) Build tāngata whenua capacity and capability.</p> <p>This option does not suggest that SmartGrowth overhauls its systems and processes to improve Tāngata Whenua partnership and participation. An iterative and adaptive approach is needed given the dynamic nature of the political climate along with the relationships within and between SmartGrowth partners.</p> <p>This Option will be guided by the CTWF as well as Council Kaupapa Māori staff and partner forums.</p>
Option 1B	<p><b>Note the submissions. In addition, make no changes to Strategy content or way of working with tāngata whenua.</b></p> <p>Continue SmartGrowth engagement through the CTWF and, where needed, wider community consultation processes. Utilise existing Council Forums for specific projects, where appropriate.</p>
<p><b>Issue 2: Enabling the Marae as Centres approach</b></p> <p>No specific content changes are suggested for the Strategy. Nevertheless, the hearing panel will need to consider the extent to which the implementation and funding plan supports and empowers hapū, iwi and Māori land trusts to be actively involved (or leading) parts of the Marae as Centres Programme.</p>	
Option 2A (recommended)	<p><b>Note the submissions and make no changes to Strategy content. Nevertheless, include action(s) in the funding and implementation plan relating to future support and resourcing of tāngata whenua in the Marae as Centres programme.</b></p>

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Issue 1: Partnerships and Participation within SmartGrowth	
<b>Option 1A (recommended):</b> Note the submissions and make no changes to Strategy content. Nevertheless, review and improve the way the SmartGrowth partners work with hapū, marae, Iwi and Māori communities to achieve SmartGrowth outcomes. The method of review will be guided by the CTWF as well as Council Kaupapa Māori staff and partner forums.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Addresses the matters within submissions.</li> <li>Improved view and perception of SmartGrowth.</li> <li>Potential increase in engagement of hapū and Iwi with the CTWF and SmartGrowth projects.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Capacity of already-stretched Tū Pakari team to coordinate discussions (outlined below) and identified recommended improvements.</li> <li>Diverted focus and attention from Strategy implementation (e.g. Marae as Centres Programme).</li> </ul>
<b>Financial implications</b>	
There is no specific budget to review and improve the way of working within SmartGrowth.	
<b>Other considerations:</b> The first CTWF meeting of the year is scheduled for 26 February 2024. This meeting will include focused discussion on strategic direction; work plan for the year and ways to connect better with hapū, marae and Māori land trusts. Time will be set aside at this workshop for further discussion on the matters outlined within this paper.  SmartGrowth to consider providing more interactive, useable, and accessible online mapping tools. This would help to better inform tāngata whenua engagement and support the Marae as Centres programme.	

Issue 1: Partnerships and Participation within SmartGrowth	
<b>Option 1B:</b> Note the submissions. In addition, make no changes to Strategy content or way of working with tāngata whenua.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Systems and processes already in place.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Submissions highlight that this option does not adequately ensure meaningful partnership and participation of tāngata whenua within SmartGrowth.</li> <li>Increase in frustration of hapū and Iwi with SmartGrowth.</li> </ul>

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	<ul style="list-style-type: none"> <li>• Increase in dis-engagement of hapū and Iwi from CTWF and SmartGrowth projects.</li> <li>• Potential risk of submissions or appeals for SmartGrowth projects that require a plan change or resource consent.</li> </ul>
<b>Financial implications</b>	
No implications to existing budget.	
<b>Other considerations:</b> It is worth noting that irrespective of efforts made within SmartGrowth to improve Partnership and Participation, some former CTWF members may prefer to work directly with SmartGrowth partners (or via Council Partnership Forums) to progress their aspirations.	

**Issue 2: Enabling the Marae as Centres approach**

**Option 2A (recommended):** Note the submissions and make a minor changes to Transformational Shift 2 within the Strategy (in bold):

02. Marae as Centres and Opportunities for Whenua Māori

Marae as cultural, social, and economic centres, activating the affordable development of housing on whenua Māori and opportunities for papakāinga (housing, education, social, hauora facilities). **This bottom-up, marae community-driven approach supports mana whenua practice and exercise of “ahi ka / ahikāroa” being the occupation of the whenua in a new and evolving context. Such an approach not only strengthens marae communities at the grassroots level but also empowers them to actively shape the development and decisions that impact their whenua, fostering self-determination and resilience for present and future generations.**

In addition, include action(s) in the funding and implementation plan relating to future support and resourcing of tāngata whenua in the Marae as Centres programme. Implementation will need to be guided by the CTWF as well as Council Kaupapa Māori staff and partner forums. This will build on existing work and ensures that initiatives are adequately phased, resourced and supported.

**Advantages**

- Addresses the matters within submissions, particularly regarding marae/hapū resilience building and self-determination.
- Increase in engagement of hapū and Iwi with the CTWF and SmartGrowth projects.
- Greater chance of success for the Marae as Centres programme.

**Disadvantages**

- Financial implication.

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<b>Financial implications</b>
To be addressed in the Funding and Implementation Plan.
<b>Other considerations:</b> Other external funding sources should also be explored.

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Recommended Decisions
<p><b>Issue 1: Partnerships and Participation within SmartGrowth</b>  <b>Option 1A:</b> Note the submissions and make no changes to Strategy content. Nevertheless, review and improve way of working within SmartGrowth.</p> <p><b>Issue 2: Enabling the Marae as Centres approach</b>  <b>Option 2A:</b> Note the submissions and make no changes to Strategy content. In addition, include action(s) in the funding and implementation plan relating to future support and resourcing of tāngata whenua in the Marae as Centres programme.</p>
Decision
<p><b>Issue 1: Partnerships and Participation within SmartGrowth</b>  Option 1A: Note the submissions and make no changes to Strategy content. Nevertheless, review and improve way of working within SmartGrowth.</p> <p><b>Issue 2: Enabling the Marae as Centres approach</b>  Option 2A: Note the submissions and make a minor change to Transformational Shift 2 within the Strategy. In addition, include action(s) in the funding and implementation plan relating to future support and resourcing of tāngata whenua in the Marae as Centres programme.</p>
Reason
<p>Options 1A and 2A</p> <ul style="list-style-type: none"> <li>• Addresses the concerns raised in the submissions and result in actions that demonstrate a meaningful commitment to tāngata whenua as partners to SmartGrowth.</li> <li>• Improved view and perception of SmartGrowth.</li> <li>• Increase in engagement of hapū and Iwi with the CTWF and SmartGrowth projects.</li> <li>• Greater chance of success for the Marae as Centres programme.</li> </ul> <p>In both cases, implementation will be guided by the CTWF as well as Council Kaupapa Māori staff and partner forums. This will build on existing work, at a local or marae level, and ensure that initiatives are adequately phased, resourced and supported.</p>

**Date approved:****Approved by:**

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Sensitivity: General

# SmartGrowth Strategy 2023–2073

## ISSUES AND OPTIONS PAPER

### Climate Resilience

Author: Manini Abernethy (Bay of Plenty Regional Council)

<b>Topic</b>	Climate resilience
<b>Issues</b>	<ol style="list-style-type: none"> <li>1. Managed retreat</li> <li>2. Emissions reductions targets</li> <li>3. Climate resilient development</li> <li>4. Climate change action</li> </ol>

#### Staff Narrative

##### Overview of submissions

19 submitters provided feedback on the climate resilience chapter.

- Linda – submitter 6
- Angela – submitter 7
- Wolf, Eva Maria Lieve – submitter 9
- Van De Weyer, Callum – submitter 22
- Richard – submitter 27
- Thorpe, Andrew – submitter 28
- Mcleod, Whitiara – submitter 32
- Lois – submitter 37
- Sadler, Jon – submitter 46
- Fitter, Julian Richmond – submitter 47
- Lucas, David Thomas – submitter 50
- Bowden, Beth Willard – submitter 53
- Robson, John – submitter 54
- Holyoake, Peter – submitter 55
- Ministry Of Education – submitter 59
- Envirohub – submitter 62
- Zespri International Limited – submitter 71
- New Zealand Kiwifruit Growers – submitter 76
- Ngai Tukairangi Hapu Trust – submitter 86

Seven submitters generally support the Strategy's approach to climate resilience. Two submissions noted climate change and the speed at which it is occurring must be considered in any future decision processes.

The Ministry of Education submission requested the growth directives as notified are retained to address climate resilience.

Submission 50 questioned if climate change was a real issue and if so then NZ would make no difference to the overall world climate problem. Accordingly, they submitted the money could be spent on other projects.

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Eight submitters generally oppose the Strategy's approach to climate resilience. Four submissions simply responded "no" to the question on whether the strategy was focusing on the right things (submission 6, 28, 37 and 54).

**Issue 1: Managed retreat**

Two submitters (submission 7 and 76) queried whether the SmartGrowth strategy considered managed retreat and identified the land areas required to deal with managed retreat as some areas have been identified as potentially affected by coastal/river erosion and inundation.

Submission 55 also noted many marae in the Bay of Plenty were located on land close to sea level and at risk of potential flooding with some marae already experiencing floods. The submitter recommended planning and budgeting to assist the relocation of these marae at risk.

Submission 86 seeks support to develop comprehensive climate adaptation strategies tailored to the unique challenges faced by Ngāi Tukairangi hapū in Matapihi.

**Issue 2: Emissions reductions targets**

Submission 27 noted climate change needed to be at the centre of all thinking in particular transport and intensification. They stated the importance to move away from a car centric way of thinking and considered the electric car was not the answer, instead people should be sharing their commute. They queried passenger rail as an option, particularly as an interregional mode of transport. The hearings panel requested further information on how well emissions reductions targets have been integrated into the strategy and what other Tiers One and SG partners are doing in this space.

**Issue 3: Climate resilient development**

Submission 27 stated that new subdivision development should look to good intensification examples, with multi-storey building and green space. They noted that all communities needed access to green space and large trees. They queried how larger land plots in old neighbourhoods could become opportunities for development. They noted that in many cities, slum neighbourhoods are bought cheaply, and intensification happens. However, that stage would not occur therefore another way was needed around the issue.

Submission 46 stated that more emphasis should be on carbon footprints and encouraging more sustainable building materials. They further stated there should be partnerships between local government and organisations to provide incentives to businesses to be carbon neutral or carbon positive.

Submission 47 wants climate resilience to be the key to everything and noted growth as damaging to the environment and climate. They seek to minimise the impact of growth on the climate and considered the strategy did not take

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this into account. They also considered that the strategy does not consider the environmental and climate issues specifically at risk from sea level rise or tsunamis.

Submission 55 raises environmental and social concerns including storm surge, future rainfall, future development locations and location of marae on land close to sea level. They made the following recommendations.

- Avoid asphalt use
- Extensive use of tree-lined streets and stands of trees.
- Maximise light-coloured parking areas and road surfaces.
- Use white as a roof colour for Council, commercial and residential roofs.
- Avoid high rise building and heat traps.
- Passive cooling features for new developments for older people
- Tree-shaded walkways, especially near retirement villages
- Future use of community halls as “cooling centres”
- Each Connected Centre has a community hall to act as a “cooling centre”.
- Avoid development in coastal areas, which could be impacted by storm surge in the future.
- Grant no more building consents in low lying coastal areas of flood zones and consents in flat areas, which have nearby water courses.
- Classify these as “No-Go” areas – i.e., suitable for grazing or short-term crops.
- Oversize all new storm water systems.

The submission further adds that the demand for additional accommodation will increase as other parts of NZ become uninhabitable therefore incorporating climate resilience into future development should be passive and self-sufficient.

#### **Issue 4: Climate change action**

Submission 55 is critical of the Strategy not having a plan of action to address the large contribution to climate change from agriculture in the western bay of plenty.

Submission 71 supported the approach noting that it aligns with the Kiwifruit Industry Climate Change Adaptation Plan.

Submission 86 seeks an emergency response plan in event of water supply disruptions for the Whareroa and Matapihi community. The disaster preparedness plan must be culturally sensitive and inclusive of Mātauranga Māori to safeguard the community's water needs in the face of climate related challenges.

Submission 62 seeks to incorporate the ‘ecosystems and biodiversity’ principle into the Strategy. The submission also mentions there is little mention of mitigation approaches and considers that if these are funded and implemented will save money in adaptation projects over the 50-year period.

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The following SmartGrowth background papers should also be referred to:

- SmartGrowth Strategy Climate resilience background paper (September 2023)
- SmartGrowth Strategy Areas to be protected and developed carefully background paper (August 2023)
- SmartGrowth Strategy Infrastructure background paper (August 2023)

There are four key issues set out for the Panel's consideration. The practicable options in relation to these issues are set out below along with the recommended options for the Panel to consider.

Summary of issues and options	
<b>Issue 1: Managed retreat</b>	
Option 1A	Note the submissions and make no changes.
Option 1B (recommended)	<p>Amend paragraph text of <i>key climate resilience challenge</i> 3 as follows (changes shown in underlined text):</p> <p>"...We do not yet have a good understanding of how these long-term changes will affect people in these exposed locations, and we will need to be proactive in working with exposed communities, anticipate the support that may be required, and offer equitable solutions. <u>We will need to ensure any adaptation options are planned and implemented with meaningful involvement from communities.</u> We can manage further development in high hazard areas to mitigate exposure, while aiming to manage vulnerability".</p>
<b>Issue 2: Emissions reductions targets</b>	
Option 2A	Note the submissions and make no changes.
Option 2B (recommended)	<p>Amend paragraph text of <i>Principle 1</i>, as follows (changes shown in underlined text):</p> <p>"<i>This could happen through designing multi-modal transport into existing, and ahead of, new development. <u>Design and development of new buildings and community centres could facilitate reduced emissions outcomes through energy use, remote working patterns, carpooling, park and rides, active transport, and accessibility to frequent, reliable and innovative public transport services along public transport corridors.</u> Emissions could be captured through enhancing and restoring local ecosystems or establishing new ones</i>".</p>

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	<p>and</p> <p>Amend <i>growth directive 3</i> as follows (changes shown in underlined text):</p> <p><i>"3. Development and infrastructure are planned to <u>encourage and enable emissions reductions and be resilient and adaptive to climate change and natural hazards</u>".</i></p>
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<b>Issue 3: Climate resilient development</b>	
Option 3A	Note the submissions and make no changes.
Option 3B (recommended)	<p>Amend paragraph text of <i>key climate resilience challenge 9</i> as follows (changes shown in underlined text):</p> <p><i>"...Resilience must also be considered in the context of long-term sustainability, such that even the most resilient communities may not be sustainable in the long term due to the impact of the rising seas on their communities. <u>In navigating these challenges, it is crucial to incorporate the prioritisation of health, safety and wellbeing of people, particularly for the vulnerable population into climate resilience development strategies</u>".</i></p>
<b>Issue 4: Climate change action</b>	
Option 4A	Note the submissions and make no changes.
Option 4B (recommended)	<p>For clarity, note SmartGrowth's support for the various climate action plans and initiatives. Amend paragraph text of <i>regional, sub-regional and district responses</i> as follows (changes shown in underlined text):</p> <p><i>"Initiatives and plans are also in place or in development at a regional and district level including the Bay of Plenty Regional Council Climate Change Action Plan 2021, Western Bay of Plenty District Council Climate Change Action Plan 2021 and Tauranga City Council Climate Action and Investment Plan and Nature and Biodiversity Action and Investment Plan. <u>This Strategy supports the implementation of the various climate action plans and initiatives for the western Bay of Plenty...</u>"</i></p>

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<b>Issue 1: Managed retreat</b>	
<b>Option 1A: Note the submissions and make no changes.</b>	
<p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>• The Strategy promotes the achievement of climate-resilient development with three key principles including integrating climate resilience into the Connected Centres programme.</li> <li>• The Strategy notes that Iwi and community members will need to be involved in climate change adaptation processes and to be able to make informed decisions about their future (refer page 75).</li> <li>• The Strategy identifies key climate resilience challenges including the need to involve Iwi and community members in climate change adaptation processes and to be able to make informed decisions about their future (refer page 75), and the costs of adaptation in climate-vulnerable areas and possibly <u>managed retreat</u> from at-risk coastal areas (refer page 76, emphasis added).</li> </ul>	<p><b>Disadvantages</b></p> <ul style="list-style-type: none"> <li>• No clear direction is provided in the Strategy to promote the community-led approach and process in preparing a fit for purpose climate adaptation plan.</li> <li>• Does not specifically identify any land areas that may be required to deal with managed retreat (if required) as requested by submitters.</li> </ul>
<b>Financial implications</b>	
None.	
<b>Other considerations</b>	
<p>The National Adaptation Plan (NAP) adopted in 2022 is a six-year plan intended to help New Zealand adapt to climate change. It has four key priorities to address including driving climate-resilient development in the right places and laying the foundations for a range of adaptation options including managed retreat. The NAP has had a significant effect on the Strategy (page 29). The Strategy promotes the achievement of climate-resilient development with three key principles including integrating climate resilience into the Connected Centres programme. The Strategy also identifies key climate resilience challenges including costs of adaptation in climate-vulnerable areas where it specifically notes a range of adaptive actions will need consideration, such as strengthening coastal infrastructure, construction of resilient housing, and possibly managed retreat from at-risk coastal areas (page 76, emphasis added).</p>	

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**(Recommended) Option 1B: Amend paragraph text of key *climate resilience challenge 3* as follows (changes shown in underlined text):**

"...We do not yet have a good understanding of how these long-term changes will affect people in these exposed locations, and we will need to be proactive in working with exposed communities, anticipate the support that may be required, and offer equitable solutions. We will need to ensure any adaptation options are planned and implemented with meaningful involvement from communities. We can manage further development in high hazard areas to mitigate exposure, while aiming to manage vulnerability".

**Advantages**

- Enables the Strategy to provide clear direction in promoting a community-led approach and process when preparing a climate adaptation plan.
- There is a case study provided in the Strategy "He Toka Tū Moana Mō Maketū – Maketū Climate Change Adaptation Plan" (page 78) which is exemplar in demonstrating the effectiveness of a community-led process in preparing a climate change adaptation plan.

**Disadvantages**

- Does not specifically identify any land areas that may be required to deal with managed retreat (if required) as requested by submitters.

**Financial implications**

None.

**Other considerations**

Managed retreat is one of many adaptation responses to the impacts of climate change. The most appropriate adaptation options will be different for every community. Managed retreat is usually not considered in isolation from other options, especially when planning for future rather than current impacts of climate change. In some cases, retreat may be a last resort, and in all cases the costs and benefits will need to be carefully weighed. A place-based and risk-based approach should ensure the adaptation options adopted will meet the specific needs and circumstances of the community. Working with communities to assess these options means that decisions made as to which options will be adopted for a particular community are robust and well supported and understood by that community. The case study provided in the Strategy "He Toka Tū Moana Mō Maketū – Maketū Climate Change Adaptation Plan" is exemplar in demonstrating the effectiveness of a community-led process in preparing a climate change adaptation plan.

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A recently released report<sup>1</sup> notes that there is a lack of clear direction from the Government on how and when to plan and implement adaptation (particularly managed retreat). The Climate Adaptation Bill which was expected (under previous Government) to address policy issues around managed retreat and to give guidance on local adaptation planning, is still being developed. The report makes a few recommendations including noting the importance of involving and working with local communities on planning and implementing strategic local responses to climate change and, support for community engagement at central government level.

Issue 2: Emissions reductions targets	
Option 2A: Note the submissions and make no changes.	
<b>Advantages</b> No changes required and various partner climate action plans and initiatives can proceed as planned.	<b>Disadvantages</b> <ul style="list-style-type: none"><li>Some members of public may not be aware of the targets.</li><li>The market is unlikely to deliver housing intensification at the necessary scale and pace required to reduce emissions without stronger strategic direction.</li></ul>
Financial implications	
None.	
Other considerations	
<p>From a climate resilience perspective, the Strategy has identified key climate resilience challenges including requiring transport infrastructure to be planned, designed, built, and operated in a way that anticipates, prepares for, and adapts to changing climate conditions.</p> <p>In 2022 the Government published its first Emissions Reduction Plan (ERP). The ERP sets out the principles the Government will use, and the actions it will take, to meet New Zealand’s domestic greenhouse gas emissions reduction target<sup>2</sup>. New Zealand has several greenhouse gas emissions reduction targets. They include both domestic and international targets up to the year 2050.</p> <p>The SmartGrowth Strategy transport chapter identifies four sub-targets for reducing transport emissions by approximately 41% from 2019 levels. The Strategy (page 73) refers to the various climate action plans in place at a regional and district level:</p>	

<sup>1</sup> Mercier, K. (2023). A Shared Future – Working with communities to adapt to a changing climate. The Helen Clark Foundation. <https://helenclark.foundation/publications-and-medias/a-shared-future/>

<sup>2</sup> Reduce all greenhouse gases (except biogenic methane) to net zero by 2050 and reduce emissions of biogenic methane within the range of 24–47% below 2017 levels by 2050 including to 10% below 2017 levels by 2030.

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- Bay of Plenty Regional Council Climate Change Action Plan 2021,
- Western Bay of Plenty District Council Climate Change Action Plan 2021
- Tauranga City Council Climate Action and Investment Plan

Each of these Climate Action plans have set goals to reduce greenhouse gas emissions at a regional or district level. At a sub-regional level, the Strategy (page 74) influences the growth pattern for the region with a focus on transport and housing following the connected centres program approach. The two challenges in the topic chapter that tackle emissions reduction are noted on page 74 as follows:

1. *Moving to tackle emissions reduction, climate change adaptation, and biodiversity restoration in an integrated and holistic way.*
2. *Providing housing for a growing population while needing to align our urban form and growth areas with emissions reduction target.*

The SmartGrowth Strategy recognises 'Emissions Reduction through Connected Centres' (page 158) as one of its five Transformational Shifts. The above confirms the issue of emissions reductions and targets has been appropriately covered and integrated within the SmartGrowth strategy.

**(Recommended) Option 2B: Amend paragraph text of *Principle 1*, as follows (changes shown in underlined text):**

"This could happen through designing multi-modal transport into existing, and ahead of, new development. Design and development of new buildings and community centres could facilitate reduced emissions outcomes through energy use, remote working patterns, carpooling, park and rides, active transport, and accessibility to frequent, reliable and innovative public transport services along public transport corridors. Emissions could be captured through enhancing and restoring local ecosystems or establishing new ones".

**and**

Amend *growth directive 3* as follows (changes shown in underlined text):

"3. Development and infrastructure are planned to encourage and enable emissions reductions and be resilient and adaptive to climate change and natural hazards".

**Advantages**

- Addresses submitter 27 request to include carpooling and park and ride as examples of facilitating low emissions outcomes.

**Disadvantages**

None

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<ul style="list-style-type: none"> <li>• Captures all new developments rather than just building and community centre design.</li> <li>• Acknowledges importance of the role accessible and frequent PT services play in facilitating low emission outcomes in new developments.</li> </ul>	
<b>Financial implications</b>	
None.	
<b>Other considerations</b>	
<p>There are many forms of multi-occupant vehicles, all of which are better for the environment than the same individuals driving alone. Carpooling is a practicable tool for regularly scheduled commutes, especially to lower-density employment centres, such as business and industrial parks, that are not dense enough to attract high-quality transit<sup>3</sup>.</p> <p>Submitter 47 also commented about the housing density being too low in new growth areas to reduce emissions. It is worth noting that a blanket target of 30 DPH "over time" (ie. medium density) is much lower than what has been needed overseas to enable development of low-emissions urban systems. Higher density style housing also provides more flexibility/adaptive capacity as public green space which can accommodate expansion of blue-green infrastructure solutions tends to be maximised.</p>	
<b>Issue 3: Climate resilient development</b>	
<b>Option 3A: Note the submissions and make no changes.</b>	
<b>Advantages</b> There are no changes required to the Strategy and <i>Principle 2</i> (page 67), refers to climate resilience development.	<b>Disadvantages</b> Does not address the importance of considering the health, safety and wellbeing of people in climate resilience development.
<b>Financial implications</b>	
None. No changes are required under this option.	
<b>Other considerations</b>	
None.	

<sup>3</sup> Walker, J. 2012. Human Transit: How clearer thinking about public transit can enrich our communities and our lives.

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<b>(Recommended) Option 3B: Amend paragraph text of key climate resilience challenge 9 as follows (changes shown in underlined text):</b>	
<p>“...Resilience must also be considered in the context of long-term sustainability, such that even the most resilient communities may not be sustainable in the long term due to the impact of the rising seas on their communities. <u>In navigating these challenges, it is crucial to incorporate the prioritisation of health, safety and wellbeing of people, particularly for the vulnerable population into climate resilience development strategies</u>”.</p>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>The Strategy prioritises the health, safety and wellbeing of people particularly for the vulnerable population when considering climate resilience development.</li> <li>Addresses the recommendations of the submitter to include consideration of elderly population during extreme heat environments resulting from climate change.</li> </ul>	<b>Disadvantages</b> <p>None identified.</p>
<b>Financial implications</b>	
<p>None. Minor textual changes are required.</p>	
<b>Other considerations</b>	
<p>The submitter has made recommendations for the Strategy to include design considerations for homes to be safer during extreme heat particularly for the elderly and vulnerable population. The recommendations are specific to building design and development and applicable at a regulatory level such as through resource or building consent matters.</p> <p>However, based on the recommendations from the submitter, there is an opportunity to incorporate the health, safety and wellbeing of people particularly the elderly and vulnerable when developing with climate resilience in mind by including this in the chapter.</p>	
<b>Issue 4: Climate change action</b>	
<b>Option 4A:</b> Note the submissions and make no changes.	
<b>Advantages</b> <p>No changes to be made to the Strategy.</p>	<b>Disadvantages</b> <p>There is no clarity in the Strategy around the need for a climate action plan.</p>

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<b>Financial implications</b>	
None. No changes are required.	
<b>Other considerations</b>	
<p>The Strategy has tried to highlight the importance of incorporating resilience into development, refer Principle 2, page 67.</p> <p>The Strategy does consider impacts from rising sea levels (page 69) and tsunamis (page 49). Refer to the maps in the strategy that identify areas at risk from climate change (map 5).</p> <p>The Strategy proposes to incorporate the principle of ecosystems and biodiversity as noted in Principle 3 (page 67). Furthermore, the Strategy notes in the growth directives the mitigation approach for coastal, terrestrial and freshwater ecosystems (page 77).</p>	
<p><b>(Recommended) Option 4B: For clarity, note SmartGrowth's support for the various climate action plans and initiatives. Amend paragraph text of <i>regional, sub-regional and district responses</i> as follows (changes shown in underlined text):</b></p> <p>"Initiatives and plans are also in place or in development at a regional and district level including the Bay of Plenty Regional Council Climate Change Action Plan 2021, Western Bay of Plenty District Council Climate Change Action Plan 2021 and Tauranga City Council Climate Action and Investment Plan and Nature and Biodiversity Action and Investment Plan. <u>This Strategy supports the implementation of the various climate action plans and initiatives for the western Bay of Plenty...</u>"</p>	
<p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>• The climate resilience chapter refers to the climate action plans and initiatives in place or in development at a regional and district level (refer page 73).</li> <li>• Enables the Strategy to provide a strong strategic direction and support for the current and developing climate action plans and initiatives for the western Bay of Plenty.</li> <li>• Avoids duplication of actions and initiatives of various existing climate action plans for the western Bay of Plenty.</li> </ul>	<p><b>Disadvantages</b></p> <p>None identified.</p>
<b>Financial implications</b>	
TBC	
<b>Other considerations</b>	

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The Strategy notes on page 73 that “Initiatives and plans are also in place or in development at a regional and district level including the Bay of Plenty Regional Council Climate Change Action Plan 2021, Western Bay of Plenty District Council Climate Change Action Plan 2021 and Tauranga City Council Climate Action and Investment Plan and Nature and Biodiversity Action and Investment Plan. The effects of climate change on natural hazards are also fully considered in accordance with the natural hazards framework established under the Bay of Plenty Regional Policy Statement (2016) for the planned urban growth area”.

The Tauranga City Council's Climate Action and Investment Plan (Climate AIP) includes a plan of actions and investments over the short, medium, and long term which will aim to achieve the goals in Tauranga Taurikura Environment Strategy for a ‘low emissions and climate resilient city’.

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Recommended Decision
Issue 1: Managed retreat
<p><b>Option 1B: Amend paragraph text of <i>key climate resilience challenge 3</i> as follows (changes shown in underlined text):</b></p> <p>"...We do not yet have a good understanding of how these long-term changes will affect people in these exposed locations, and we will need to be proactive in working with exposed communities, anticipate the support that may be required, and offer equitable solutions. <u>We will need to ensure any adaptation options are planned and implemented with meaningful involvement from communities.</u> We can manage further development in high hazard areas to mitigate exposure, while aiming to manage vulnerability".</p> <p><b>Reasons for recommendations:</b></p> <ul style="list-style-type: none"> <li>• Enables the strategy to provide clear direction in promoting a community-led approach and process when preparing for climate adaptation. This is consistent with best-practice.</li> <li>• There is an existing case study in the Strategy (page 78) that demonstrates the effectiveness of a community-led process in preparing a climate change adaptation plan.</li> </ul>
Issue 2: Emissions reductions targets
<p><b>Option 2B: Amend paragraph text of <i>Principle 1</i>, as follows (changes shown in underlined text):</b></p> <p>"This could happen through designing multi-modal transport into existing, and ahead of, new development. <u>Design and development of new buildings and community centres could facilitate reduced emissions outcomes through energy use, remote working patterns, carpooling, park and rides, active transport, and accessibility to frequent, reliable and innovative public transport services along public transport corridors.</u> Emissions could be captured through enhancing and restoring local ecosystems or establishing new ones".</p> <p><b>and</b></p> <p>Amend <i>growth directive 3</i> as follows (changes shown in underlined text):</p> <p>"3. Development and infrastructure are planned to <u>encourage and enable emissions reductions and</u> be resilient and adaptive to climate change and natural hazards".</p> <p><b>Reasons for recommendation:</b></p>

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- There are many forms of multi-occupant vehicles, all of which are better for the environment than the same individuals driving alone. Carpooling is one such tool for regularly scheduled commutes.
- This principle should be applied to all new development and public transport must also be considered in these new developments to reduce carbon emissions.

### Issue 3: Climate resilient development

#### **Option 3B: Amend paragraph text of *key climate resilience challenge 9* as follows (changes shown in underlined text):**

“...Resilience must also be considered in the context of long-term sustainability, such that even the most resilient communities may not be sustainable in the long term due to the impact of the rising seas on their communities. In navigating these challenges, it is crucial to incorporate the prioritisation of health, safety and wellbeing of people, particularly for the vulnerable population into climate resilience development strategies”.

#### **Reasons for recommendation:**

- Health, safety and wellbeing of all people is an important consideration when designing homes to be safer during extreme weather-related events.
- Considering the needs of the most vulnerable population in climate resilient development strategies ensures the benefits of meeting their needs extends to the health, safety and wellbeing of the whole population.

### Issue 4: Climate change action

#### **Option 4B: For clarity, note SmartGrowth’s support for the various climate action plans and initiatives. Amend paragraph text of *regional, sub-regional and district responses* as follows (changes shown in underlined text):**

“Initiatives and plans are also in place or in development at a regional and district level including the Bay of Plenty Regional Council Climate Change Action Plan 2021, Western Bay of Plenty District Council Climate Change Action Plan 2021 and Tauranga City Council Climate Action and Investment Plan and Nature and Biodiversity Action and Investment Plan. This Strategy supports the implementation of the various climate action plans and initiatives for the western Bay of Plenty...”

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<b>Reasons for recommendation:</b> <ul style="list-style-type: none"><li>• Enables the Strategy to provide a strong strategic direction and support for the current and developing climate action plans and initiatives for the western Bay of Plenty.</li><li>• Avoids duplication of actions and initiatives of various existing climate action plans for the western Bay of Plenty.</li></ul>
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<b>Decision</b>
<i>(To be completed in the decision-making meeting)</i>
<b>Reason</b>
<i>(To be completed in the decision-making meeting)</i>

**Date approved:**

**Approved by:**

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# SmartGrowth Strategy 2023–2073

## ISSUES AND OPTIONS PAPER

### Te Taiao –Environment

**Author: Barbara–Ann Overwater**

<b>Topic</b>	– (Part 3, The Spatial Plan, Chapter 04)
<b>Issues</b>	<ol style="list-style-type: none"> <li>1. Poor air quality</li> <li>2. Impact of growth on the environment</li> <li>3. Manage and protect freshwater resources</li> </ol>

#### Staff Narrative

##### **Overview of feedback received**

A total of 19 submission points were coded to Te Taiao – Our Environment arising from 15 submitters:

Ranjard, Louis – submitter 1

Low, Jason –submitter 35

Sustainable Bop Trust – submitter 91

Smith-Kerr, Stephanie Heather – submitter 2

Pirere, Tania – submitter 17

Mcleod, Whitiara – submitter 32

Ministry Of Education – submitter 59

Chalmers, Nick – submitter 20

Fitter, Julian Richmond – submitter 47

Bowden, Beth Willard – submitter 53

Robson, John – submitter 54

Envirohub – submitter 62

Pirirakau Tribal Authority – Incorporated – submitter 69

Tangata Whenua Collective submission – submitter 60

Ngai Tukairangi Trust – submitter 87

Two submitters (Sub I.D #32, # 59) generally expressed support for the approach outlined in the chapter. Submitter I.D #54 generally opposes the chapter.

Submitter I.D #17 did not provide specific feedback on the chapter however highlighted the work of D.O.C in looking after our tupuna and making sure our whenua and Moana are protected.

##### **Issue 1: Poor air quality**

Three submitters (Sub I.D #1, #35, #91) expressed concern about air quality in the area, with two of these submitters (Sub I.D #35, #91) requesting to move the polluting industry away from the Mount industrial zone. Sub I.D #1 considers air quality a top priority for the development of the region however sees only limited mention of it in the strategy. This submitter suggests imposing standards for the industry and to limit the traffic in the area until air pollution returns to safe levels. Sub I.D #91 questioned why

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the polluted air shed at the Mount is not addressed in the strategy, with its supplementary submission letter noting that it is a major concern for that community, including local hapu and iwi. This submitter questions whether the strategy can address this matter through providing a sub-region wide overview of the most suitable location/s for polluting activities over a 30–50-year timeframe.

### **Issue 2: Impact of growth on the environment**

Several submitters (Sub I.D #2, #20, #47) questioned how the impact of growth on the environment will be addressed, with specific points on:

- the effect of growth on resources, particularly kaimoana and how will environmental impacts of growth be negated
- priority given to the environment and enhancing native biodiversity
- impact of the Te Tumu development on the most significant river in the region and adjacent wetland
- industrial environment protection in relation to building houses and the associated waste.

Submitter I.D #69 have noted that the Taiao implications against the SmartGrowth Strategy are hugely significant, and the strategy enables and influences this direction. This submitter notes the waterways are now largely modified and controlled for flooding management and states this is not the Taiao that is promised against historic confiscation and the impacts on our natural environment. This submitter requests greater recognition and actions provided for by the NPSFM and NPSIB.

Submitter I.D #53 states that the proposed growth directives are “highly qualified” and “privileging of human settlement ambitions” and questions the meaning of the proposed directive “growth of the western Bay of Plenty is within environmental limits”.

Submitter I.D #62 has submitted that councils have opportunities to remedy environmental degradation but it needs to be a primary focus not just an afterthought. The transformational shift in thinking and action must place green infrastructure in the same scoping space as built infrastructure, noting that ecosystems are not an add-on, but are fundamental. Sub I.D #62 requests the inclusion of the Climate Resilience Chapter 03 principle ‘*Integrate and enhance local ecosystems and biodiversity*’ into each of the grey integration boxes within each chapter and requests an appropriate environmental growth directive is added to each chapter.

### **Issue 3: Manage and protect freshwater resources**

Submitter I.D #32 noted that data is needed that will indicate whether Te Taiao can accommodate the current municipal water take and future municipal take.

Two submitters (Sub I.D #60, #87) have identical submission points which question whether there is sufficient capacity within the natural environment to handle more people, and if there is sufficient water supply for a growing population. These two submitters highlighted the need to ensure waterways and aquifers are kept healthy and not stressed by over abstraction and the need to ensure a whole systems approach, from maunga ki te moana.

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Submitter I.D #87 questioned whether the strategy considers how the implementation of Te Mana o te Wai and the National Policy Statement for Freshwater Management (NPSFM) may be constrained with the predicted urban growth. This submitter notes that water is fundamental to its orchard operations and without adequate access its business is not viable. The submitter also noted that there are other considerations that must be incorporated into urban planning processes to help cities effectively manage and protect freshwater resources such as drinking water supply, wastewater and stormwater management, sustainable water use (water conservation, efficient irrigation, reclaimed water for non-potable purposes), ecosystem conservation, integrated land-use planning, climate change resilience, public education, and emergency preparedness.

Submitter I.D #87 also expressed interest in a collaborative approach to understanding how the sub-regions Māori land trusts with horticultural/agricultural/energy interests (dependent on freshwater) could be impacted by restricted access because of urban growth.

#### Key considerations

- The extent to which the strategy has addressed air quality concerns, particularly around the Mount Industrial Zone.
- The extent to which the strategy has given priority to protecting and enhancing Te Taiao our environment.
- The extent to which the strategy focuses on the protection of the health and well-being of freshwater resources and the need to ensure a whole systems integrated approach.

The SmartGrowth background papers should also be referred to:

- SmartGrowth Strategy Te Taiao – Our Environment background paper (September 2023)
- SmartGrowth Strategy Infrastructure background paper (August 2023)
- Tauranga City Council

There are three key issues set out for the Panel's consideration. The practicable options in relation to these issues are set out below.

### **Options overview**

#### **Issue 1: Poor air quality**

##### **How the draft SmartGrowth Strategy currently addresses the issue of poor air quality, directly or indirectly:**

- Part 1: Transformation Shift 05 – Restore and enhance eco-systems for future generations – *Ensuring what's special about the western Bay of Plenty environment is restored and enhanced – the beaches, harbour, open spaces, native bush, wetlands and air* (page 20). The transformational shifts will guide the priorities for the Strategy's Implementation and Funding Plan.
- Part 3: Chapter 06– Urban Form and Centres (page 106): Includes reference to the SmartGrowth partners collaboratively working on several projects that relate to industrial land, particularly work relating to the Mount Maunganui/Port

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	<p>industrial area. This chapter notes that these projects collectively respond to a range of significant issues, of which air quality and health concerns are noted.</p> <ul style="list-style-type: none"> <li>Part 3: Chapter 11 – Economic Well-being (page 136): Includes projected employment numbers for Mount Maunganui alongside recognising the ‘Airshed and environmental considerations.</li> </ul>
<p><b>Option 1A (recommended)</b></p>	<ul style="list-style-type: none"> <li>Amend Figure 2 <i>Chapter 04 – Te Taiao Our Environment</i> to recognise environmental management plans and programmes which include reference to air quality</li> <li>Insert additional text in <i>Chapter 04 – Te Taiao Our Environment –Key Challenges</i> that recognises the effects of existing activities and intensification on our environment, including reference to air quality,</li> <li>Reference in the Implementation and Funding Plan to the continued collaboration of partners and stakeholders in the delivery of environmental management plans and programmes.</li> </ul>
<p><b>Issue 2: Impact of growth on the environment</b></p> <p><b>How the draft SmartGrowth Strategy currently addresses the issue of impact of growth on the environment, directly or indirectly:</b></p> <ul style="list-style-type: none"> <li>Part 1: Transformational Shifts (page 18): Inclusion of an overarching fundamental principle ‘Ngā Wai ki Mauao me Maketū’ which underpins the six transformational shifts for change (pages 18-21). The principle embodies a commitment to environmental sustainability to ensure that population growth and social and economic development can be accommodated within natural resource ‘limits’. It recognises: <ul style="list-style-type: none"> <li>–The importance of the waters (coastal and freshwater bodies) that flow to Mauao and Maketu and the significance of these two places to tāngata whenua</li> <li>–The linkages between the maunga (mountains), ngāhere (forests), awa (waterways), repo (wetlands), tāhuna (estuaries) and moana (harbours and ocean).</li> <li>–The protection and enhancement of the interconnected nature of these elements through an integrated catchment management approach, using nature-based solutions and enhancing biodiversity, while improving climate resilience.</li> </ul> </li> <li>Part 1: Transformational Shifts: Footnote 6 (page 18) explains that the natural resource ‘limits’ are set by National Policy Statements and Environmental Standards and by the Natural and Built Environment Act (NBA) and the National Planning Framework.</li> <li>Part 1: Transformation Shift 05 – Restore and enhance eco-systems for future generations – <i>Ensuring what’s special about the western Bay of Plenty environment is restored and enhanced – the beaches, harbour, open spaces, native bush, wetlands, and air</i> (page 20)</li> <li>Part 3: Chapter 04 – Te Taio (page 80): Setting out the values associated with our environment and including reference to the fundamental principle that</li> </ul>	

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growth accommodation must be within the limits set through 'Ngā Wai ki Mauao me Maketū'.

- Part 3: Chapter 04 – Te Taiao: Figure 1 (page 81) Identifying the scope of Te Taiao to show the domains of Moana, Awa and Whenua and interconnectedness with indigenous biodiversity. This helps understand Te Taiao, show the interconnections, and identify environmental challenges later in the chapter.
- Part 3: Chapter 04– Te Taiao Figure 2 (page 82)– *Te Taiao – our environment connections to existing work programmes*. The figure represents the collective response to the many challenges faced, to ensure what's special about the western Bay of Plenty environment is protected, enhanced, and restored. The current or on-going work is a mix of local or site-specific projects (e.g., community care group projects, species, and habitat restoration projects), spatial plans for areas, and reserve management planning, city and district-wide policies and plans, catchment-based programmes, and programmes to implement national policy direction (including the National Policy Statement on Freshwater Management and National Policy Statement on Indigenous Biodiversity).
- Part 3: Chapter 04 –Te Taiao: Key challenges (page 83): These include (amongst others) reference to Natural Resource Limits and pressure on the environmental resources; and the challenge of implementing NPSIB and NPSFM which will require integrated work streams with several stakeholders.
- Part 3: Chapter 02 Tangata Whenua: Key challenges (page 62)– #4 Cumulative and potentially irreparable impact of uncontrolled urban development on the natural environment.
- Growth directives:
  - Development avoids areas with important environmental, cultural and heritage values, or that are at risk from coastal erosion (including inner harbour erosion) (page 51)
  - Take a precautionary approach to development in areas identified as 'go carefully'.
  - Nature-based solutions and water sensitive urban design are priorities and used in urban areas (page 77)
  - Coastal, terrestrial and freshwater ecosystems are enhanced to improve carbon storage and resilience to climate change (page 77)
  - An interconnected network of open spaces, reserves and ecological corridors is developed (page 85).
  - A full range of ecosystems in the western Bay of Plenty are maintained or restored to a healthy functioning state (page 85)
  - Growth of the western Bay of Plenty is within environmental limits (page 85)
  - Secure and protect long-term water availability for all our communities within environmental limits set in accordance with Te Mana o te Wai (page 125)
- Part 3: Chapter 04 – Te Taiao: Integration with the Well-beings, Objectives and Climate Resilience Principles (grey box page 85).
- Part 3: Chapter 04 – Te Taiao: Maps 6 Biodiversity; Map 7 Open Space and Access; Map 8 Protecting and Enhancing Key Areas; Map 9 Marine Natural and Cultural Areas provide a spatial representation of Te Taiao

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<ul style="list-style-type: none"> <li>Case Studies – Pages 86,96, 98</li> <li>Part 3: Chapter 05 –Rural: Introduction – identifies the rural area containing most of the sub-region’s remaining indigenous flora and fauna, highlighting the need for protection and enhancement (page 92)</li> </ul>	
<b>Option 2A (recommended)</b>	<ul style="list-style-type: none"> <li>Insert additional text in <i>Chapter 04 – Te Taiao Our Environment</i> to include:             <ul style="list-style-type: none"> <li>amended ‘key challenge’ to include reference to <u>growth needing to be efficient in its use of natural resources, cleaner and more resilient, while accounting for natural hazards and the role of environmental management and nature resources in minimising risks.</u></li> <li>additional ‘key challenges’ to address preserving the values of the coastal marine area, and the loss and degradation of indigenous biodiversity</li> </ul> </li> <li>Definition of Environmental Limits included in the appendix.</li> <li>Insert the Climate Resilience principle ‘<i>Integrate and enhance local ecosystems and biodiversity</i>’ into the grey integration box within chapters 5–8 and 10,11 of <i>Part 3 The Spatial Plan</i>.</li> </ul>
<b>Option 2B</b>	<p>Option 2A and include:</p> <ul style="list-style-type: none"> <li><i>additional appropriate environmental growth directives in other chapters in the strategy.</i></li> </ul>
<p><b>Issue 3: Manage and protect freshwater resources</b></p> <p><b>How the draft strategy currently addresses the issue of managing and protecting freshwater resources, directly or indirectly:</b></p> <ul style="list-style-type: none"> <li>Part 2: The Growth Challenge – Challenges and Opportunities (page 38) Challenge 6 – <i>Managing pressure from development on the natural environment, including from more intensive horticultural and agricultural uses.</i></li> <li>Part 3: Chapter 01- Areas to be protected and developed carefully: Background section – environmental areas and landscapes (page 49).</li> <li>Part 3: Chapter 01 – Areas to be protected and developed carefully: Key Challenge #1 Pressures on the natural and cultural environment (page 50).</li> <li>Part 3: Chapter 04 – Te Taiao: Identifying existing projects, implementation plans, programmes and action plans contributing to Te Taiao (Figure 2, page 82) which includes NPS-FM work programme, Catchment strategies, programmes and projects, Three Waters Infrastructure Strategies, Co-governance River documents.</li> <li>Part 3: Chapter 02- Tangata Whenua: Key Challenges #4 – Cumulative and potentially irreparable impact of uncontrolled urban development on the natural environment (page 62).</li> <li>Part 3: Chapter 02 – Tangata whenua perspectives on growth management diagram (page 59): Economic (inequities – including access to water), Environmental – Low impact design/water sensitive urban design.</li> </ul>	

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- Part 3: Climate Resilience: Figure 12 Climate Resilient Development Principles – Integrating and enhancing local ecosystems and biodiversity.
- Part 3: Chapter 04 – Te Taiao –Introduction: values associated with our environment include waterways and water quality (page 80).
- Part 3: Chapter 04- Te Taiao: Figure 2: Includes catchment strategies, programmes and projects alongside NPS Freshwater Programme (page 82).
- Part 3: Chapter 04 – Te Taiao: Key challenges:
  - Natural resource limits (page 83)
  - Achieving clear integration of Ngā Wai ki Mauao me Maketu with other key topics, utilising methods such as Water Sensitive Urban Design, Low Impact Design and integrated catchment planning to promote clean and sustainable water outcomes and achieve national policy direction (page 83).
  - Achieving Ngā Wai ki Mauao me Maketū (page 84)
  - Implementation of the NPSFM and noting it will require integrated work streams with several stakeholders (page 84).
- Part 3: Chapter 04: Te Taiao – Map 6: Biodiversity; Map 8 Protecting and enhancing key areas.
- Part 3: Chapter 09: Three Waters and Other Infrastructure: Three waters key challenges (pages 123–124), challenge 1, 4 and 7.
- Growth directives:
  - Development avoids areas with important environment, cultural and heritage values, or that are at risk from coastal erosion (including inner harbour erosion) (page 51)
  - Take a precautionary approach to development in areas identified as 'go carefully' (page 51)
  - Nature based solutions and water sensitive urban design are prioritised and used in urban areas (page 77)
  - Coastal, terrestrial, and freshwater ecosystems are enhanced to improve carbon storage and resilience to climate change (page 77)
  - An interconnected network of open spaces, reserves and ecological corridors is developed (page 85).
  - A full range of ecosystems in the western Bay of Plenty are maintained or restored to a healthy functioning state (page 85)
  - Growth of the western Bay of Plenty is within environmental limits (page 85)
  - Planning of land use and infrastructure (including three waters, transport, and community facilities) is fully integrated to:
    - Be resilient to climate change and natural hazards.
    - Achieve holistic sub-regional approach.
    - Give effect of Te Mana o te Wai.
    - Be in partnership with tāngata whenua and our communities.
    - Meet environmental and cultural standards.
    - Achieve cost-effective development.
  - Secure and protect long-term water availability for all our communities within environmental limits set in accordance with Te Mana o te Wai (page 125)
  - Wastewater and water supply networks and treatment plants are managed across the sub-region to achieve efficient and effective investment to service planned urban growth (page 125)

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<ul style="list-style-type: none"><li>- Stormwater is managed to: use nature-based and water sensitive urban design and integrate with a water cycle approach (page 125)</li><li>- Part 4: FDS: Development Infrastructure (page 150)</li></ul>	
Option 3A (recommended)	<ul style="list-style-type: none"><li>• Insert additional text in <i>Chapter 04 – Te Taiao Our Environment</i> to include:<ul style="list-style-type: none"><li>– Description of catchment management/enhancement and freshwater resources in the introduction.</li><li>– Amendments to key challenges to highlight land use planning is critical in managing various land uses in a catchment, and reference to Te Mana o te Wai.</li></ul></li></ul>
Option 3B	Option 3A and include: <ul style="list-style-type: none"><li>-an additional growth directive for healthy waterbodies</li></ul>

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Issue 1: Air Quality	
<b>Option 1A: Recommended</b> <ul style="list-style-type: none"> <li>Provide additional text that recognises the issue of poor air quality amongst other environmental management issues as follows: <ul style="list-style-type: none"> <li>Amend and insert additional wording in <i>Part 3: The Spatial Plan – Chapter 04 Te Taiao – Our Environment Figure 2</i> as follows: <ul style="list-style-type: none"> <li>Insert a new circle titled “Environmental management” with the following associated bullet points in a text box: <ul style="list-style-type: none"> <li>Mount Maunganui airshed management plan</li> <li>BOPRC monitoring programmes</li> <li>Local Spatial Plan actions</li> <li>Travel Demand management/behavioural change programmes</li> <li>Iwi and hapū management plans</li> <li>Regional Policy Statement</li> <li>Regional Plans</li> </ul> </li> </ul> </li> <li>Insert additional wording in the <i>Part 3: The Spatial Plan- Chapter 04 Te Taiao – Our Environment, Key Challenges</i> to include a new challenge as follows: <u>‘Effect of existing activities and intensification on our environment’</u>. Our environment is polluted when substances or kinds of energy (noise, light, heat) enter it and cause harm. Although some pollutants occur naturally, in urban areas pollution comes mostly from human activities (such as industry, agriculture, urban development and transport) and can accumulate to harmful levels in air, land, freshwater, and marine environments. Pollutants can move in the air, in water, and through soil, often over large distances and long periods of time. Pinpointing the cause of pollution can be difficult. Some pollution comes from one place (e.g. emissions from a factory) while other pollution has many sources (e.g. vehicle emissions or agriculture practices). Pollution has a major effect on our environment, harming our ecosystems and our relationship with nature, and posing risks to human health. <u>We need to manage the impact of pollution on people’s health and the environment, and improve environmental, cultural and social well-being outcomes.</u></li> <li>Ensure the Implementation and Funding Plan recognises the SmartGrowth partnership, Ministry for the Environment and Te Whatu Ora continues to work alongside mana whenua, iwi, businesses, other stakeholders and community groups to enhance the effectiveness of environmental management plans and programmes and identify future aspirations around addressing the effects of polluting activities.</li> </ul> </li> </ul>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Would address submitters concern regarding the need for more recognition of the issue of poor air quality.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Does not directly respond to some of the submission points received in relation to moving polluting industrial activities away from the Mount Maunganui Industrial area. This issue has been raised as part of the Mount to Arataki Spatial Plan consultation. The Strategy is not the place to be addressing</li> </ul>

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<ul style="list-style-type: none"> <li>• Would recognise the variety of work programmes, plans and policy measures related to environmental management processes, including air quality.</li> <li>• Would enable the issue of poor air quality to be recognised amongst other environmental challenges.</li> <li>• Would highlight emitting activities are having adverse effects on people, communities, and the environment.</li> <li>• Includes recognition of continued collaborative working amongst all partners and stakeholders to address polluting activities.</li> </ul>	specific and detailed planning issues other than to provide a framework for aligning such matters with the Strategy direction.
<b>Financial implications</b>	
None. No changes are required under this option.	
<b>Other considerations</b>	
<b>Financial implications</b>	
<b>Issue 2: Impact of growth on the environment</b>	
<b>Option 2A: Recommended</b> <ul style="list-style-type: none"> <li>• Provide additional text as follows: <ul style="list-style-type: none"> <li>i. Insert additional text in <i>Part 3: The Spatial Plan- Chapter 04 -Te Taiao Our Environment - Introduction (paragraph 3)</i> as follows: <ul style="list-style-type: none"> <li>– Underpinning these values is the fundamental principle that growth accommodation must be within the <u>environmental</u> limits set through Ngā Wai ki Mauao me Maketu, which recognises:</li> <li>– Amend footnote #1 (bottom of page 80) as follows: The limits referred to in this context are informed by National Policy Statements and Environmental Standards. <u>See the definition of environmental limits in the appendix, and in the future by the Natural and Built Environment Act and the National Planning Framework.</u></li> </ul> </li> </ul> </li> </ul>	

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- ii. Include a definition of Environmental Limits in the Appendix as follows: Environmental Limit: The level of some environmental pressure, indicator of environmental state or benefit derived from the natural resource system, beyond which conditions are deemed to be unacceptable in some way
- iii. Insert additional text in *Part 3: The Spatial Plan- Chapter 04 Te Taiao Our Environment -Key Challenges* as follows:
  - Amend the environmental challenge #1 *Natural Resource Limits*, as follows: As our sub-region grows, the pressure on the environmental resources increases. In particular, managing natural hazards, protecting highly productive land and managing water. Many of the sub-region's resources are facing growing pressures. Successive reports show that pressure on our climate, waterways, marine environment and land is mounting. As a sub-region, we need to invest back into the environment more than what we take out. This is an on-going challenge when the sub-region has high growth rates. We need to ensure that growth is efficient in its use of natural resources, cleaner and is resilient, accounting for natural hazards and the role of environmental management and nature resources in minimising risks.
  - 
  - Include a new environmental challenge around preserving the values of the coastal marine area (which will link with Map 9: Marine Natural and Cultural Areas), as follows: Our activities on land – agriculture, forestry, transport, and the growth of urban areas – create pollutants and have altered the state of many of our coastal ecosystems. Our connection to the marine environment through mahinga kai (traditional food gathering practices) and recreation has also been affected. Loss or degradation of ecosystems in the coastal marine area can decrease the benefits we receive from marine habitats in our estuaries and oceans, which include removing sediment and pollutants, mitigating the effects of climate change and providing nursery habitat for taonga species. Changes in marine biodiversity can affect how we value the ocean, and compromise the marine activities we enjoy like boating, fishing, and swimming. The loss or decline of our iconic and taonga species can negatively affect mahinga kai and the intergenerational transfer of mātauranga Māori and kaitiakitanga. We value the marine environment for social, economic, spiritual and cultural reasons and understanding the effects of these activities is crucial for managing our activities and minimising their effects.
  - Include a new environmental challenge as follows: 'Loss and degradation of indigenous biodiversity': Indigenous biodiversity is lost and degraded through pests, land fragmentation, land uses and development. Areas particularly vulnerable to incremental loss and cumulative effects are the ecosystems of wetlands, sand dunes, intact sequences of estuarine-freshwater-land habitats, harbour margins and areas with significance to Māori. Ecosystem services (the benefits we get from healthy ecosystems such as provisioning (e.g. food and fibre), purification and regulating (e.g. air and water purification, flood or climate regulation) supporting (e.g. photosynthesis and nutrient cycling) and cultural (e.g. wairua/spiritual, recreational) services) are often not well understood which can lead to inadequate protection and neglect. The reduction in biodiversity and ecosystem health can affect these services, many of which are essential to our well-being. We must place priority on maintaining, restoring, and enhancing biodiversity.

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iv. Include the Climate Resilience principle ' <i>Integrate and enhance local ecosystems and biodiversity</i> ' in the grey integration box within Chapters 05 to 08 and Chapters 10 and 11.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Addresses the submission points by providing more recognition of the importance of placing priority on protecting the environment, and restoring and enhancing biodiversity</li> <li>Provides a more wholesome description of key environmental challenges.</li> <li>Addresses the submission point on clarification of environmental limits.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Does not address the submission point on including additional environmental growth directives within all the other chapters of the Spatial plan.</li> </ul>
<b>Financial implications</b>	
None. No changes are required under this option.	
<b>Other considerations</b>	
<p>Section 109 (1) of the Natural and Built Environment Act prescribed environmental limits must be set in relation to the following aspects of the natural environment: air, indigenous biodiversity, coastal water, estuaries, freshwater, soil, and any other aspect of the natural environment in accordance with the purpose of environmental limits<sup>1</sup>. Section 111 (1) of the Natural and Built Environment Act states an environmental limit must be expressed as relating to the ecological integrity of an aspect of the natural environment or to human health. The coalition government has repealed the Natural and Built Environment Act and have ceased work on the National Planning Framework, however environmental limits can be included within objectives and policies in instruments such as National Policy Statements (NPS), the regional policy statement and council plans. A limit is a tool that strictly prevents a bottom line being exceeded. Limits must be backed up by regulatory force.</p>	
<b>Option 2B: Not Recommended</b>	
Option 2A and <ul style="list-style-type: none"> <li>Insert additional text to include appropriate environmental growth directives within all other chapters of Part 3: The Spatial Plan.</li> </ul>	

<sup>1</sup> NBA (2023) Section 105 1 (a) in relation to ecological integrity, is to prevent the ecological integrity of an aspect of the natural environment from degrading from the state it was in at the commencement of this Part. (b) in relation to human health, is to protect human health.



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<b>Advantages</b> <ul style="list-style-type: none"> <li>• As option 2A and</li> <li>• Ensures the environment growth directives are threaded throughout the strategy to address the submission point which promotes placing focus on remedying environmental degradation.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>• Inserting environmental growth directives into other chapters that do not currently contain them may create duplication. The growth directives have been drafted to align with the chapter topic but also be considered and implemented in a holistic way.</li> <li>• The Transformational Shift 05 '<i>Restore and enhance eco-systems for future generations</i>' already includes the list of growth directives in the strategy which are aligned to the environment. The purpose of the transformational shifts is to identify areas that are not business as usual components but to reflect the areas that require attention to bring about change. They will provide guidance to the preparation of the Implementation and Funding Plan.</li> </ul>
<b>Financial implications</b>	
None. No changes are required under this option.	
<b>Other considerations</b>	
<b>Issue 3: Manage and protect freshwater resources.</b>	
<b>Option 3A: Recommended</b> <ul style="list-style-type: none"> <li>• Provide additional text as follows: <ul style="list-style-type: none"> <li>i. Amend <i>Part 3: The Spatial Plan- Chapter 04 Te Taiao – Our Environment</i> Figure 2 as follows: <ul style="list-style-type: none"> <li>– Amend the blue circle titled 'NPS Freshwater Management' to remove 'NPS' and include the text 'Te Mana o te Wai' in the associated square box.</li> </ul> </li> <li>i. Additional text in <i>Part 3: The Spatial Plan- Chapter 04 Te Taiao – Our Environment –Introduction</i> (after paragraph 4) as follows:</li> </ul> </li> </ul>	

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- The catchments in the sub-region are areas of land that drain water from the top of surrounding hills down into a river, stream, lake, wetland, estuary or the open coast. Catchments influence the biodiversity and ecology of waterbodies. However, activities on the land in a catchment can impact on water quality and quantity. A healthy water catchment provides high-quality drinking water and supports livelihoods. It also supports local ecosystems so plants, animals, fish and insects that depend on having healthy water can thrive and flourish. We need to continue to ensure that catchment-scale management and enhancement practices are prioritised to create positive outcomes for our environment.
- Rivers and streams provide a range of economic benefits and have important ecological, recreational, aesthetic, and cultural values. Uses of the rivers and streams include municipal and industrial water supply, waste disposal, irrigation, frost protection and hydro-generation. Our rivers, streams, groundwater and wetlands are feeling the pressure of a growing population and land use changes. Water quality has deteriorated in some areas. This is affecting our fish and other aquatic life, drinking water supplies, mahinga kai and how we use water for recreation like swimming and fishing. When we protect the health of freshwater, the health and wellbeing of the wider environment and communities is ensured.
- 

ii. Insert additional text in *Part 3: The Spatial Plan- Chapter 04 Te Taiao – Our Environment –Key Challenges* as follows:

- Additional text in #5 *Achieving Ngā Wai ki Mauao me Maketū* as follows: Catchments are at risk from increased water demand, intensification of industrial, commercial and agricultural activities, increased recreational demand and extreme climatic events. Catchments are dynamic systems and have interactions between freshwater and other environments. Land use planning is critical in managing various land uses in a catchment, thereby minimising conflicts and sustaining water quality and quantity for future generations. Ngā Wai ki Mauao me Maketū is an integrated approach that recognises the interconnectedness of the whole environment, and the interactions between the land, freshwater and the coastal area. Achieving integration can be difficult across a range of agencies and organisations with different functions, responsibilities and priorities. A key challenge will be identifying a suitable scale (e.g., sub-region vs catchment) where integration can be effectively implemented and managing cumulative impacts.
- Additional text in #7 *Implementing NPS Freshwater Management* as follows: Rivers, streams, wetlands, groundwater and geothermal resources contribute significantly to the sub-region's environmental, cultural, economic and social wellbeing. They offer opportunity for wildlife, recreation and amenity, stormwater management and connections between the places we live. Te Mana o te Wai is a fundamental concept focused on restoring and preserving the balance between water (wai), the wider environment (taiao), and people (tāngata), now and in the future. To safeguard the health of these water bodies, we need to ensure they are healthy, resilient and thriving for our community, flora and fauna.

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<b>Advantages</b> <ul style="list-style-type: none"> <li>• Addresses some of the submission points.</li> <li>• Includes recognition of Te Mana o te Wai.</li> <li>• Additional text in the introduction section will provide a more holistic description of the scope of Te Taiao. This will provide better connection with the subsequent sections of the chapter, Chapter 9 'Three Waters and other infrastructure' and its growth directives.</li> <li>• Additional text in the key challenges section will better describe the challenges which catchments are currently facing.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>• Does not address the submission points around identifying whether there is sufficient water supply for a growing population and the need to collect data that will indicate whether Te Taiao can accommodate the current municipal water take and future municipal take. However, the matter of how the management of water across the Western Bay of Plenty sub-region is planned is addressed further in the Infrastructure background paper (see commentary below) and addressed in the Infrastructure Issues and Options paper.</li> <li>• Does not address the submission points regarding whether there is a challenge of implementing Te Mana o te Wai and the NPS-FM with the predicted urban growth, and a collaborative approach to understanding how the sub-regions Māori land trusts with horticultural/agricultural/energy interests (dependent on freshwater) could be impacted by restricted access because of urban growth. However, these points are essentially addressed in Chapter 9 Three Waters and Other Infrastructure and the chapter's growth directives 1 and 2.</li> </ul>
<b>Financial implications</b>	
None. No changes are required under this option.	
<b>Other considerations</b>	
<p>Policy 1 of the NPS-FM seeks that freshwater is managed in a way that gives effect to Te Mana o te Wai. Te Mana o te Wai is about restoring and preserving the balance between the water, the wider environment, and the community. The requirement for integrated management is embedded in the NPS-FM (Section 3.5). This requires authorities that share jurisdiction over a catchment to co-operate in the integrated management of the effects of land use and development on freshwater. Authorities must also recognise the interconnectedness of the whole environment, and the interactions between freshwater and other environments. The coalition government has recently announced the intention to review the National Policy Statement for Freshwater Management 2020 (NPS-FM) to rebalance Te Mana o te Wai to better reflect the interests of all water users and enable councils more flexibility in how they meet environmental limits. The government will be seeking advice on how to exempt councils from obligations under the NPS-FM as soon as practicable.</p> <p>The SmartGrowth Strategy Infrastructure background paper (September 2023) refers to the Terms of Reference which was signed in April 2022 between Tauranga City Council (TCC), Bay of Plenty Regional Council and Western Bay of Plenty District Council (WBOPDC) with the goal of establishing a clear</p>	

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<p>understanding of resources available for municipal water supply and to develop a plan regarding how these resources may be sustainably utilised moving forward to provide municipal water to communities in the western Bay of Plenty in the short to medium term. Initial analysis work has been completed. Based on the outcomes of the work to date there has been ongoing and regular collaboration between the partners to understand and resolve sub-regional water supply challenges. TCC and WBOPDC are in the process of co-developing a 30-year Water Supply Strategy which will address long-term needs of the sub-region to give effect to Te Mana o Te Wai and the NPS-FM. The strategy will inform investments, plans and policy decisions required to support planned growth in the sub-region.</p>	
<p><b>Option 3B: Not Recommended</b></p> <p>Option 3A and:</p> <ul style="list-style-type: none"> <li>• Include an additional growth directive in <i>Part 3: The Spatial Plan- Chapter 04 Te Taiao Our Environment</i> to refer to: The vital importance of clean, healthy water is recognised and the health and well-being of waterbodies, freshwater ecosystems and their catchments are valued, protected, and restored.</li> </ul>	
<p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>• As option 3A and;</li> <li>• Reflects the growing understanding of water as a precious resource</li> <li>• May help the consideration and implementation of the concept of Te Mana o te Wai in the Implementation and Funding Plan priorities, actions/initiatives.</li> </ul>	<p><b>Disadvantages</b></p> <ul style="list-style-type: none"> <li>• As option 3A and;</li> <li>• An additional growth directive may result in a duplication of direction. The existing environment growth directive in Chapter 04– ‘<i>A full range of ecosystems in the western Bay of Plenty are maintained or restored to a healthy, functioning state</i>’ – captures all ecosystems, including freshwater ecosystems.</li> </ul>
<p><b>Financial implications</b></p>	
<p>N/A</p>	
<p><b>Other considerations</b></p>	

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**Recommended Decisions****Issue 1: Poor air quality****Option 1A:**

Provide additional text in Part 3: *Chapter 04 – Te Taiao Our Environment* as follows:

- Include text that recognises the issue of poor air quality amongst other environmental management issues:
  - i. Amend and insert additional wording in Figure 2 as follows:
    - Insert a new circle titled “Environmental management” with the following associated bullet points in a text box:
      - Mount Maunganui airshed management plan
      - BOPRC monitoring programmes
      - Local Spatial Plan actions
      - Travel Demand management/behavioural change programmes
      - Iwi and hapū management plans
      - Regional Policy Statement
      - Regional Plans
  - ii. Insert additional wording in the *Part 3: The Spatial Plan- Chapter 04 Te Taiao – Our Environment, Key Challenges* to include a new challenge as follows: ‘Effect of existing activities and intensification on our environment’: Our environment is polluted when substances or kinds of energy (noise, light, heat) enter it and cause harm. Although some pollutants occur naturally, in urban areas pollution comes mostly from human activities (such as industry, agriculture, urban development and transport) and can accumulate to harmful levels in air, land, freshwater, and marine environments. Pollutants can move in the air, in water, and through soil, often over large distances and long periods of time. Pinpointing the cause of pollution can be difficult. Some pollution comes from one place (e.g. emissions from a factory) while other pollution has many sources (e.g. vehicle emissions or agriculture practices). Pollution has a major effect on our environment, harming our ecosystems and our relationship with nature, and posing risks to human health. We need to manage the impact of pollution on people’s health and the environment, and improve environmental, cultural and social well-being outcomes.

Ensure the Implementation and Funding Plan recognises the SmartGrowth partnership, Ministry for the Environment and Te Whatu Ora continues to work alongside mana whenua, iwi, businesses, other stakeholders and community

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groups to enhance the effectiveness of environmental management plans and programmes and identify future aspirations around addressing the effects of polluting activities.

#### Reasons for recommendation:

The Strategy currently does not contain sufficient recognition of the issue of poor air quality. The option will go some way to addressing submitters' concerns and it will acknowledge the effect of emitting activities on people, communities and the environment and the need to manage the impact of pollutants.

Figure 2 does not currently include reference to the variety of 'environmental management' plans and work programmes, which include air quality, and the recognition of environmental management plans and programmes in the Implementation and Funding Plan and the need for continued collaborative working amongst partners will also help address submitters concerns.

#### Issue 2: Impact of growth on the environment

##### Option 2A:

Provide additional text in Part 3: *Chapter 04 – Te Taiao Our Environment* as follows:

- Insert additional text in *Part 3: The Spatial Plan- Chapter 04 –Te Taiao Our Environment – Introduction* to provide further clarification of 'Environmental Limits' and include a definition in the Appendix.
- Insert additional text in *Part 3: The Spatial Plan- Chapter 04 Te Taiao Our Environment –Key Challenges* as follows:
  - 
  - Amend the environmental challenge #1 *Natural Resource Limits*, as follows: As our sub-region grows, the pressure on the environmental resources increases. In particular, managing natural hazards, protecting highly productive land and managing water. Many of the sub-region's resources are facing growing pressures. Successive reports show that pressure on our climate, waterways, marine environment and land is mounting. As a sub-region, we need to invest back into the environment more than what we take out. This is an on-going challenge when the sub-region has high growth rates. We need to ensure that growth is efficient in its use of natural resources, cleaner and is resilient, accounting for natural hazards and the role of environmental management and nature resources in minimising risks.
  - 
  - Include a new environmental challenge as follows: 'Preserving the values of the coastal marine area': Our activities on land – agriculture, forestry, transport, and the growth of urban areas – create pollutants and have

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altered the state of many of our coastal ecosystems. Our connection to the marine environment through mahinga kai (traditional food gathering practices) and recreation has also been affected. Loss or degradation of ecosystems in the coastal marine area can decrease the benefits we receive from marine habitats in our estuaries and oceans, which include removing sediment and pollutants, mitigating the effects of climate change and providing nursery habitat for taonga species. Changes in marine biodiversity can affect how we value the ocean, and compromise the marine activities we enjoy like boating, fishing, and swimming. The loss or decline of our iconic and taonga species can negatively affect mahinga kai and the intergenerational transfer of mātauranga Māori and kaitiakitanga. We value the marine environment for social, economic, spiritual and cultural reasons and understanding the effects of these activities is crucial for managing our activities and minimising their effects.

- 
- Include a new environmental challenge as follows: 'Loss and degradation of indigenous biodiversity': Indigenous biodiversity is lost and degraded through pests, land fragmentation, land uses and development. Areas particularly vulnerable to incremental loss and cumulative effects are the ecosystems of wetlands, sand dunes, intact sequences of estuarine-freshwater-land habitats, harbour margins and areas with significance to Māori. Ecosystem services (the benefits we get from healthy ecosystems such as provisioning (e.g. food and fibre), purification and regulating (e.g. air and water purification, flood or climate regulation) supporting (e.g. photosynthesis and nutrient cycling) and cultural (e.g. wairua/spiritual, recreational) services) are often not well understood which can lead to inadequate protection and neglect. The reduction in biodiversity and ecosystem health can affect these services, many of which are essential to our well-being. We must place priority on maintaining, restoring, and enhancing biodiversity.
- Include the Climate Resilience principle '*Integrate and enhance local ecosystems and biodiversity*' in the grey integration box within Chapters 05 to 08 and Chapters 10 and 11.

#### **Reasons for recommendation:**

Addresses the submission points about providing more emphasis on the importance of protecting the environment and integrating and enhancing local ecosystems and biodiversity.

Provides a definition of environmental limits; provide a more wholesome description of the key environmental challenges the sub-region is facing;

#### **Issue 3: Manage and protect freshwater resources**

##### **Option 3A:**

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Provide additional text in Part 3: *Chapter 04 – Te Taiao Our Environment* as follows:

- Amend Figure 2 as follows:
  - Amend the blue circle titled 'NPS Freshwater Management' to remove 'NPS' and include the text 'Te Mana o te Wai' in the associated square box.
- Insert additional text in *Part 3: The Spatial Plan- Chapter 04 Te Taiao – Our Environment –Introduction* (after paragraph 4) as follows: The catchments in the sub-region are areas of land that drain water from the top of surrounding hills down into a river, stream, lake, wetland, estuary or the open coast. Catchments influence the biodiversity and ecology of waterbodies. However, activities on the land in a catchment can impact on water quality and quantity. A healthy water catchment provides high-quality drinking water and supports livelihoods. It also supports local ecosystems so plants, animals, fish and insects that depend on having healthy water can thrive and flourish. We need to continue to ensure that catchment-scale management and enhancement practices are prioritised to create positive outcomes for our environment.
  - Rivers and streams provide a range of economic benefits and have important ecological, recreational, aesthetic, and cultural values. Uses of the rivers and streams include municipal and industrial water supply, waste disposal, irrigation, frost protection and hydro-generation. Our rivers, streams, groundwater and wetlands are feeling the pressure of a growing population and land use changes. Water quality has deteriorated in some areas. This is affecting our fish and other aquatic life, drinking water supplies, mahinga kai and how we use water for recreation like swimming and fishing. When we protect the health of freshwater, the health and wellbeing of the wider environment and communities is ensured.
- Insert additional text in *Part 3: The Spatial Plan- Chapter 04 Te Taiao – Our Environment –Key Challenges* as follows:
  - Additional text in Key Challenge #5 *Achieving Ngā Wai ki Mauao me Maketū* as follows: Catchments are at risk from increased water demand, intensification of industrial, commercial and agricultural activities, increased recreational demand and extreme climatic events. Catchments are dynamic systems and have interactions between freshwater and other environments. Land use planning is critical in managing various land uses in a catchment, thereby minimising conflicts and sustaining water quality and quantity for future generations. Ngā Wai ki Mauao me

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Maketū is an integrated approach that recognises the interconnectedness of the whole environment, and the interactions between the land, freshwater and the coastal area. Achieving integration can be difficult across a range of agencies and organisations with different functions, responsibilities and priorities. A key challenge will be identifying a suitable scale (e.g., sub-region vs catchment) where integration can be effectively implemented and managing cumulative impacts.

- Additional text in Key Challenge #7 *Implementing NPS Freshwater Management* as follows: Rivers, streams, wetlands, groundwater and geothermal resources contribute significantly to the sub-region's environmental, cultural, economic and social wellbeing. They offer opportunity for wildlife, recreation and amenity, stormwater management and connections between the places we live. Te Mana o te Wai is a fundamental concept focused on restoring and preserving the balance between water (wai), the wider environment (taiao), and people (tāngata), now and in the future. To safeguard the health of these water bodies, we need to ensure they are healthy, resilient and thriving for our community, flora and fauna.

#### Reasons for recommendation:

Additional text in the introduction section to describe catchment management/enhancement and freshwater resources will provide a more holistic description of the scope of Te Taiao and will align better with Figure 1 *Scope of Te Taiao – Our Environment*. Additional text in the Key Challenges section will help to address the submissions by describing some of the challenges facing catchments and the need to recognise the interconnectedness of the whole environment.

Including references to the concept of Te Mana o te Wai in this chapter will create a better connection to the subsequent references in *Chapter 09 Three Waters and other Infrastructure* and the Implementation and Funding Plan.

#### Decision

*(To be completed in the decision-making meeting)*

#### Reason

*(To be completed in the decision-making meeting)*

**Date approved:**

**Approved by:**

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SmartGrowth Strategy 2023–2073

ISSUES AND OPTIONS PAPER

Transport

**Authors:** Sarah Dove (TCC), Peter Siemensma (TCC), Bron Healey (BOPRC), Calum McLean (WBOPDC).

Topic	Transport Planning
Themes	<div><div>1. Passenger rail</div><div>2. Improved public transport</div><div>3. Investment in transport infrastructure</div><div>4. Transport for an aging population and planning for all abilities</div><div>5. Infrastructure for walking and cycling</div><div>6. Car parking</div><div>7. Managed Lanes</div><div>8. Resilience</div><div>9. Ferries</div><div>10. Park and ride facilities and services</div><div>11. Emissions and air pollution</div><div>12. Miscellaneous</div></div>

Staff Narrative
<div><div>Overview of feedback received, related to Transport Planning</div><div><p>Out of the 93 submissions received, 35 refer to transport matters. Twelve ‘themes’ are evident in the submissions and are discussed below. Within each themes numerous issues were raised, and these are also responded to below.</p><div><div>Theme 1 – Passenger rail</div><div><p>Seventeen submitters discuss passenger rail in their submissions. All seventeen submitters support the idea that Western Bay of Plenty generally and Tauranga in particular should have a passenger rail service. Although some submissions are quite specific by suggesting e.g. passenger trains between Hamilton and Tauranga, other submissions just note ‘trains’ without specifying whether their comment relates to inter-regional passenger transport e.g. between Tauranga and Hamilton, or whether they focus more urban passenger services such as light rail. Most consider this service from an environmental and climate change perspective, as one of the submitters opined “[it will be] one of the key ways of reducing carbon outputs in our city”. Another submitter suggests that the government should fund electric passenger trains. Other submitters suggest upgrading the existing rail tracks (potentially double tracking the line) so that the service can link different centres within the Western Bay as well as the wider region</p></div></div></div></div>

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including Hamilton and Auckland. One submitter notes that UFTI surveys showed most residents supported passenger rail. Two submitters highlighted that a passenger rail service will be very viable option as our population grows, the density increases, and that more planning (under UFTI) should be done in understanding and investing rail services for both passengers and freight. One other submitter noted the importance of planning for passenger in an early phase, rather than when it might become feasible, as passenger may be otherwise precluded by certain sites being developed and no longer available for e.g. stations.

The SmartGrowth Strategy does refer to passenger rail in the Introduction of Chapter 08 Transport by noting the following on page 114: "The TSP looks at the Western Bay's entire transport system including roads, rail, public transport...." The strategy further notes on page 116 that: "Bay of Plenty Regional Council has recently prepared the Regional Public Transport Plan (RPTP) for 2022-2032. The RPTP targets a 20% mode share for public transport in urban areas by 2032. To achieve this, the strategy for western Bay of Plenty includes the following actions (among others): (...) "Explore the potential for new modes and service delivery models including on demand public transport, passenger rail and ferries, park and ride". These actions outlined in the SmartGrowth strategy will be progressed by the UFTI/TSP Partners and integrated with other workstreams under the SmartGrowth Implementation and Funding Plan.

In response to the submitters, it is noted that the recent sub-regionally focussed spatial planning process, known as the Urban Form & Transport Initiative, considered the role of local passenger rail and freight movement when agreeing the "Connected Centres" concept. UFTI supported local sub-regional commuter rail as a future option but did not foresee it as a viable alternative in the next few decades. This decision was based on the implementation cost and need for major land use change to support a passenger rail system, i.e. greater densities around (potential future) stations and more compact employment. In the shorter to medium term UFTI was also concerned that commuter rail would displace freight rail and in doing so place a significant increase of truck movements on to roads. Related to this, UFTI identified a need to continue to invest in the rail network in the short term to increase the mode share of freight movement by rail. It is noted in this context that any passenger rail options in future would need to be supported by a high-quality bus network, which aligns with the Connected Centres concept.

Furthermore, Policy 1.6 of the RPTP 2022-32 refers to Passenger Rail and exploring viability of inter-regional passenger rail and/or commuter services in the longer term. To give effect to the RPTP, BOPRC are working on their draft RLTP, and consideration will be given to include provision for a business case to jointly investigate the extension of passenger rail from Hamilton to Tauranga (with Waikato Regional Council). This is currently not confirmed and will be subject to the work on the draft RLTP.

To support the development of UFTI, KiwiRail prepared a report titled "Bay of Plenty metro passenger service opportunities"<sup>[1]</sup>. In addition, a separate earlier but regionally focussed report titled "Bay of Plenty Region Passenger and Freight Rail, Phase 1 Investigation 2019"<sup>[2]</sup> by Bay of Plenty Regional Council also identifies matters related to passenger rail. A summary of these matters follows:

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- The rail route in the BoP is currently very highly utilised and a freight operation would likely be affected by having to operate around an inter-regional passenger service unless for example there is an appropriate track separation. These known existing constraints, that is, single track areas creating timetabling constraints would need to be overcome.
- The impact of commuter rail services on existing services would need to be considered. For example, impacts such as displacement of freight services, to allow passenger rail need to be understood within both a road and rail context, so appropriate planning and operations could be implemented.
- Passenger rail services will require significant capital costs (e.g. park and ride, station facilities (buildings, platforms) and track facilities (signals, level crossing) and the investigation and planning of these needs to be undertaken.
- Key infrastructure along the route (e.g. the Tauranga Harbour bridge) has seismic risk profile and minimal passenger evacuation capability (in the example of the Kaimai Tunnel) that would need to be remedied in order to enable passenger services.
- Passenger rail requires high populations and high population densities to be a viable option. International examples state:
  - Feasible rail service requires population density greater than 4,000 to 5,000 per square mile in the vicinity of the rail line.
  - No Australasian cities under 400,000 population have a rail service. A light rail service requires 5,000-10,000 passengers per hour in the peak direction to be viable.

Tauranga, in terms of population size and density, is currently well below these thresholds.

The Select Committee for the Parliament inquiry on the future of inter-regional passenger rail in New Zealand presented its report<sup>[3]</sup> to the House of Representatives on 5 July 2023. This report highlighted that the “region’s rail network would need substantial upgrading before it could reasonably support passenger rail. Other related investments and planning processes would need to be completed first [and] ... further investigation would be needed to determine the feasibility of a rail service to Tauranga”. Based on this, the report recommended that a scoping study for Auckland-Tauranga passenger rail services will be progressed. SmartGrowth, in collaboration with Kiwirail, can support central Government to further explore the feasibility of passenger rail service from Tauranga.

In summary, sub-regionally focussed spatial planning represented by UFTI supports local commuter rail as a future option but is focussed on delivery of a bus commuter service of high frequency and reliability to match forecast growth in demand for the next few decades. BOPRC is leading local effort in supporting interregional rail investigations.

## **Theme 2 – Improved public transport**

Sixteen submitters discuss Public Transport, with almost all (fifteen) submitters highlighting the need for and importance of a frequent and reliable public transport system in the region. Most submitters said that more investment is needed in bus infrastructure in order to make the public transport system safe, reliable, frequent and

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to increase the liveability of an area. Three submitters discussed the possibility of a 'park and ride' service in the region (covered in a separate topic). One submitter said that public transport can't work in Tauranga as it has a very small population base which cannot sustain a frequent and reliable public transport service. One submitter asserted that council's planning processes put more emphasis on Public Transport in the early phases of planning. One submitter also asked for improved connectivity between the Bay of Plenty and the Waikato.

The SmartGrowth Strategy includes a Directive which states "Frequent and reliable public transport and safe, connected cycle routes are provided within and between centres".

In response to these submissions, the following studies have been undertaken or are currently underway:

- The Urban Form & Transport Initiative (UFTI<sup>[1]</sup>), considered the role of public transport when agreeing the "Connected Centres" concept. The UFTI Connected Centres Programme is designed to improve community and transport outcomes. It sets out land use and transport initiatives to support growth in the Western Bay of Plenty sub-region whilst transitioning to a multi-modal transport system that supports people's ability to live, learn, work, and play.
- The Western Bay of Plenty Transport System Plan (TSP) was developed to prioritise transport investment and optimise the sequencing of delivery of the transport interventions included in UFTI. The TSP uses current and estimated future levels of service to help identify the priority order for the transport projects to deliver the multi-modal transport system set out in UFTI.
- Bay of Plenty Regional Council (BOPRC) has completed 'Western Bay of Plenty Public Transport Reference Case'. The reference case establishes the preferred high-level Public Transport network structure for the future and identifies concept-level bus route alignments, frequencies, and supporting interchange infrastructure requirements.
- Building on this work, BOPRC is also leading Public Transport Services and Infrastructure Business Case, which is to further define the indicative public transport network and infrastructure required to service the Western Bay of Plenty sub-region.

The above partnership and planning studies highlight the need for a frequent, reliable, safe public transport system within and between centres. They will also enable the public transport investment requirements to fit together and provide complementary benefits.

The Regional Public Transport Plan (RPTP) includes an action suggesting improved regional public transport connections between Tauriko and Hamilton and other BOP to Waikato cross-boundary connections. The priority of this will be determined through regional planning processes.

BOPRC is planning an 'On demand PT trial' to begin early in 2024. This service will improve access to Public Transport in areas that are more difficult to serve with a traditional fixed route bus service. The trial is likely to cover southern Tauranga suburbs from Greerton to Pyes Pa etc. BOPRC will monitor the trial and decide if on demand services should be implemented in other areas subsequently.

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In summary, the PT services and infrastructure business case being developed by BOPRC and other related projects such as the on-demand PT trial and Cameron Road projects address matters raised by the submitters.

**Theme 3 – Investment in transport infrastructure**

Fifteen submissions discuss investment in roading and infrastructure. Concerns range from a lack of investment (10 submissions) to over-investment or investment in incorrect areas/modes creating the problem.

The majority of submissions that discuss a lack of investment would like to see more proactive infrastructure investment to effectively support housing and commercial growth. There were also specific submissions regarding the need to better invest in roading for enhanced Port of Tauranga accessibility, i.e. reliable freight journey times. Around half of the submissions that support upfront roading investment deem it appropriate to expand the roading network to reduce congestion, whereas the other half state the need to front foot roading investment prior to enabling growth. This variety of commentary demonstrates the tension between providing infrastructure to support growth, and the planning required to lead and form growth in an appropriate and sustainable/feasible way.

A third of the roading investment submissions comment on a very different opinion, that too much investment has been put into roading for private vehicles, and that more focus is required on both intensification where there are strong public transport connections existing and/or investment should be in sustainable transport options to create a mode shift and therefore better use of existing networks.

Two submitters provided a comment about PPP (one supportive, one concerned), and more generally, most submitters noting a need for more national government investment support.

The draft Strategy notes that the SmartGrowth partners will prepare an Implementation and Funding Plan for the whole Strategy, including the Future Development Strategy. The Implementation Plan will set out the details of priority actions over three years that are required to give effect to the Strategy including assigning roles, responsibilities, timeframes and programme resourcing by the SmartGrowth partners.

One submitter commented that transport, three waters and other infrastructure will be impacted by PC33, particularly in the Mount Maunganui North area, and they are concerned that the infrastructure needs won't be met. A comprehensive and appropriate transport planning and response framework (including UFTI, TSP and Infrastructure Strategy, along with a 3-year planning and refresh cycle through the LTP and RLTP) exists to manage the demands from additional growth including increased density in the Mount Maunganui North and across the wider City. The Plan Change 33 (Enabling Housing Supply) process has also sought to confirm infrastructure capacity and includes consideration of infrastructure as a resource consent matter for developments of four or more dwellings.

UFTI and the WBOP TSP provide the strategic and program structure for roading and infrastructure investment across the sub-region. The Connected Centres approach is supported by programmed investment in key corridors, across all modes, to meet the

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needs of existing and new communities, commercial businesses and the Port of Tauranga. This is aligned with realistic NLTF funding programs, but also realises the need to seek for other funding options to accelerate certain program components. The TSP was reviewed in 2023 to support the draft LTP and RLTP.

TCC has a growth pays for growth principle which underpins both its Revenue and Financing Policy and its Development Contributions Policy. TCC and WBOP generally rely on a bundle of funding and financing tools in order to support growth infrastructure (note that the following text does not apply to the BOPRC, as a regional council doesn't provide and fund growth infrastructure as aren't able to collect development contributions). These funding and financing tools are:

- NZ Transport Agency – Waka Kotahi funding
- Infrastructure Acceleration Funding – this is grant funding which is being made available to fund a portion of each of Cameron Rd Stage 2 (and surrounding works) and State Highway 29 works.
- Infrastructure funding and financing levies – this is grant funding to TCC (but relies on debt to be repaid by Tauranga residents) which is available to fund a portion of 13 transport projects including many TSP projects.
- Development contributions – these are charged to developers on both a citywide and local basis as development occurs. Charges are set based on the demand created by new development and the benefits received by those developers.
- Debt funded by rates – TCC holds debt relating to transport assets. This is a useful way of ensuring that the cost of infrastructure is paid through time by those who use it rather than all costs being met upfront by ratepayers at the time the infrastructure is delivered. The debt is generally repaid using development contributions and general or targeted rates (relating to a geographic area or ratepayer type). In the upcoming financial year, we expect the average residential ratepayer will pay about \$315 towards TCC's net interest costs. This does not include interest on debt for growth-related infrastructure as this interest is repaid by the growth community.

TCC also has work underway to ensure that the impact of rates is imposed equitably.

- Commercial differential – TCC has made a strategic decision to impose a commercial differential of approximately 5:1 for transport funding. Generally speaking, this means commercial ratepayers pay half the costs associated with transport infrastructure with the remaining half paid by residential ratepayers. This differential will continue to be reviewed over time.
- Industrial rates – TCC is consulting on introducing an industrial rate which would be separate to the commercial rate and ensure heavy transport users are contributing a greater amount towards transport infrastructure than commercial or residential ratepayers.

Western Bay of Plenty District uses the following funding sources for Transportation:

- Targeted Rates
- Subsidies/grants
- User Fees and Charges

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- General Rates
- Financial Contributions (as opposed to development contributions)
- Loan funding
- Lump sum contributions

The SmartGrowth partners will also continue to advocate for new funding and financing tools with central government. These may include a city deal, Public-Private Partnerships and value capture tools. Each will be assessed on its merits if and when they become available.

Two submitters made reference to congestion charging, both suggesting that congestion charges are effective in reducing transport congestion and improving the uptake of other modes of transport. Related to this is a broader concept of 'variable road pricing'. The concept of road pricing as a revenue tool is also included in the Bay of Plenty RTP, Policy 1.7 that notes the RTP: *Support investigations into road pricing and other financial mechanisms designed to achieve mode shift and increase public transport use.*

TCC has recently consulted on whether to progress investigations into the concept of variable road pricing (locally known as SmartTrip) to help fund transport infrastructure projects, as well as managing road usage on key roads. This consultation has been delivered through TCC's Long Term Plan, and results are currently being analysed. The opportunity to realise this revenue stream in the future will be dependent on longer term changes from national legislation, along with determining a scheme that has social licence and is equitable, amongst other matters.

#### **Theme 4 – Transport for an aging population and planning for all abilities**

Five submissions comment that we need to better plan for an aging population. Four submitters noted the SmartGrowth strategy is very light on acting on demographic change, that it doesn't account for the projected large increase in the 65+ age group, and that it is important to plan for our elders in general (not just transport, but also relating to health facilities, social infrastructure etc.). One further submitter notes that more detailed is required on how the infrastructure can best serve the diverse need to an increasing group of older people in our community.

UFTI lists aged care and accessibility as one of the fifteen implementation principles for the Connected Centres programme. The need identified here is that the urban form of the region and the transport system needs to cater for this demographic.

The draft SmartGrowth Strategy notes some projected demographic changes in Figure 3, noting that currently approximately 15% of the sub-region's population is aged 70+ whilst this percentage is projected to grow to 30% by 2048. The Strategy includes a directive that Transport safety and accessibility is improved for all ages and abilities.

Planning for those that cannot drive a vehicle is an important part of a transport network, due to large groups of the community not having access to driving a vehicle. Due to forecasted demographic changes this group is projected to grow. Enabling land uses (higher densities and mixed-use developments) that go hand in hand with walkable neighbourhoods. Footpaths that have enough width for mobility aids, safe

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areas for people to cross the street, safe areas for people on bikes or scooters, reliable and frequent bus services with accessible bus stops and associated facilities. These, in combination with private vehicle travel will ensure that as people age, they have options in the way they travel, along with not being 'stranded' when they are no longer able to drive.

For those able to drive, but needing mobility parking spaces, TCC are working on the development of Parking Management Plans (PMP), also refer Theme 6 below. These plans do, among general supply and demand for parking, also investigate the need and numbers for mobility car parking spaces. For the CBD, work is currently underway to increase the number of mobility car parking spaces and upgrade where required, and other areas are expected to follow later.

TCC is currently undertaking an 'accessibility audit' in the City Centre. TCC will be working to rectify as many of the issues (quick wins), where projects that are progress in the city centre overlap, we will rectify through these projects. In addition, TCC Draft Urban Design Guidelines (currently being reviewed) will in the longer term provide for a more inclusive and accessible city centre. It is also worth in this context to refer to the [Accessible Tauranga Action and Investment Plan](#) (AIP), which was adopted on the 21 August 2023. The Accessible Tauranga AIP focusses on the goal to create a city that works for all and helps to deliver on the inclusive city strategy.

The Regional Public Transport Plan (RPTP) notes in its vision it will be supporting accessibility and social inclusion. It notes 'our aspiration is for our public transport system across the region to help people of all ages and abilities access employment, education and services, while maintaining the social ties that support their wellbeing'. The importance of accessibility is also reflected in RPTP Policy 5.4

In the Western Bay of Plenty District, footpaths are being made wider and smoother to make them as accessible as possible to all ages and capabilities within the community. Pedestrian crossings provide safe access across busy roads.

BOPRC currently has an Accessible Action Planning workstream underway. The purpose of this workstream is to remove existing transport accessibility barriers by giving effect to relevant policies and actions in the RPTP.

Current initiatives to support accessibility in the region include:

- Total Mobility – The Total Mobility Scheme provides subsidised taxi services for people who have difficulty using public transport because of a physical, psychological, sensory or neurological disability. It aims to complement public transport services to ensure people can meet their daily needs in a safe and dignified manner, and to enhance community participation.
- Extension of SuperGold Concession – SuperGold Card holders (65+) receive free off-peak public bus travel (Government funded). BOPRC funds an extension to these hours to enable free travel for eligible card holders from 9am on weekdays; and all day on weekends and public holidays.
- Accessibility Concession – this provides free public transport across the Bay of Plenty for anyone who is permanently unable to drive and meets the eligibility criteria. Accessibility Concession members who are assessed as being unable

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to travel independently by bus may also receive free transport for their companion (the Accessibility +1 Concession).

- Accessible buses – wheelchair accessible buses with super low floors and ramps are provided on all Bayhopper Tauranga and Cityride Rotorua urban routes and most Eastern Bay of Plenty buses. Most buses can also kneel on request. This level of accessibility supports all members of the community with limited mobility, including older age groups.

Future BOPRC actions include:

- Delivering a series of 'quick wins' to provide more accessible information to users.
- Initiating a Community Transport Forum to better understand existing transport accessibility barriers in the region and identify potential solutions.

### **Theme 5 – Infrastructure for walking and cycling**

Seven submissions discuss walking and cycling, and other modes broadly labelled as 'active modes' such as scooters, mobility devices etc. The submitters consider that planning and delivering improvements for active modes will help to reduce the demand and congestion on roads by providing people with options and choice for how they move around.

The Strategy includes two directives on this topic:

- Frequent and reliable public transport and safe, connected cycle routes are provided within and between centres.
- Transport safety and accessibility is improved for all ages and abilities.

The importance of catering for all modes of transport is a key objective and embedded throughout UFTI's Connected Centres Programme, including proposed strategic key corridors for active modes. UFTI notes that the projected growth of the sub-region is dependent on achieving mode shift to public transport and active modes of transport.

In addition, the Western Bay of Plenty Transport System Plan (TSP) identifies current transport problems, and lists goals of the TSP to address. A total of 72 transport projects are prioritised to deliver on the TSP's objectives and goals. Many of these projects include walking and cycling infrastructure improvements in both existing and new urban areas, some key projects being

- Cameron Road Stage 1 and Stage 2,
- Fifteenth Avenue business case,
- Accessible Streets Business Case Area B (Otumoetai) and Area A (Arataki).

TCC adopted the [Street Design Guide](#) as part of the [Street Design Toolkit](#) in 2021, which within the Infrastructure Development Code (IDC). One of the key drivers of the toolkit is to incorporate safety and accessibility for all modes of transport. The Toolkit is a requirement for every new street design or upgrade. These safety objectives also align with Government policies such as 'Road to Zero' and the Government Policy Statement on Land Transport (GPS) 2021.

Tauranga City Council's Long Term Plan 2024–34 lists the following as investments:

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**Investments include the following:**

<b>Local Roads Upgrades &amp; Renewals</b>	\$404m
<b>Hewletts Improvements</b>	\$189m
<b>Welcome Bay, Turret Rd &amp; Fifteenth Ave Corridor</b>	\$161m
<b>Cameron Road Stage 2</b>	\$160m
<b>Ōtūmoetai Multimodal</b>	\$103m
<b>Mount/Pāpāmoa Multimodal</b>	\$51m
<b>Accessible Streets</b>	\$64m
<b>Minor Safety Improvements</b>	\$42m
<b>Streetlight Renewal &amp; LED Upgrade</b>	\$25m
<b>Arterial Upgrades</b>	\$24m
<b>Bus Infrastructure</b>	\$81m
<b>Traffic Signalisations and Other Improvements</b>	\$21m
<b>Marshall Avenue Footpath Upgrade</b>	\$12m
<b>Park &amp; Ride Activation</b>	\$11m
<b>Domain Rd Upgrade</b>	\$8m
<b>Grenada Street Cycleway</b>	\$9m
<b>Smiths Farm Development</b>	\$9m
<b>Parking Infrastructure</b>	\$5m

WBOPDC aims to progress the cycleways and walkways identified with the WBOPDC Walking & Cycling Action Plan, noting that the delivery timing is entirely dependent on both funding and opportunity. Council has minimal funding allocated, relying heavily on external funding or Transportation subsidy where applicable for most cycleway projects. The total portfolio value of projects within the Action Plan is approximately \$50 to \$100m, including advancement of the Tauranga Moana cycleway to connect Waihi, across Tauranga Moana to Rotorua & Whakatane Districts.

Key sections of this currently being planned include:

- the Waihi to Waihi Beach trail,
- Waihi Beach to Athenree, and
- Pahoia to Aongatete.

Note: there is currently no construction funding in the LTP proposed.

WBOPDC'S most popular cycleway is the Omokoroa to Tauranga cycleway, which continues to attract visitors to the area. Opportunities to keep improving it with route realignments off roads is a priority. Some of this trail is situated within Railway Land and

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there is a risk that future rail growth (for example, double tracks) will impact these sections of the cycleway. Careful future planning is required to minimise the risk.

One submission (Ngai Tukairangi Hapu Trust) commented on the need to upgrade the Matapihi shared path to better separate cyclists and pedestrians to a good level of service, along with surveillance and lighting improvements. Typically, such investments would be earmarked under spatial planning projects or potentially through an Accessible Streets Area A business case, along with active mode/safety investment programs, rather than being referenced directly through a sub-region Strategy. As such is it recommended that this be considered through the prioritisation of the WBOP Transport System Plan.

### **Theme 6 – Car parking**

Six submitters discuss car parking matters, primarily focussed on Tauranga's centres. It is noted that the topic of Park and Rides is mentioned by one of these submitters. Park and Rides are addressed in the Public Transport theme, however the topic is related to car parking. Several other submissions noted the importance for the region to reduce its reliance on private vehicles, reduce congestion, and promote alternative transport methods. It is noted there are differences in managing parking between Tauranga's urban centres and Western Bay's more rural centres. Tauranga City's parking management can play an important role in encouraging other modes of transport too. Four submissions note that the city should invest in one or several additional car parking buildings in the CBD to make car parking easier. Another submission shares views on the investment in the CBD versus the implemented car parking changes. One submission noted a similar request for a car parking building in the Mount, while another submission suggests they would be against the introduction of car parking meters in the Mount area.

The topic of car parking is briefly noted in the introduction of Chapter 8 of the draft SmartGrowth Strategy whilst referring to the Transport System Plan (TSP), but the Strategy doesn't provide further details.

The role of car parking was a key consideration in UFTI's recommended Connected Centres Programme. The UFTI final report notes that *'the model scenarios include demand management and pricing initiatives, such as charging carparking policies to increase turnover and encourage modal shift'*. It further notes that *'for commercial areas throughout the sub-region, an appropriate level of turnover is the focus of parking management policies and activities'*.

The Transport System Plan (TSP) also acknowledges that both bus fares and parking costs have an important role to play in encourage mode shift away from the private vehicle. The TSP's Goals notes that *'Parking Management policy will encourage people to come and go frequently in commercial areas, and there will be plenty of places to park and charge e-scooters, e-bikes and electric vehicles'*.

Since UFTI was finalised, the National Policy Statement on Urban Development (NPS-UD) came into effect. The NPS-UD removed council's ability to require on-site parking at new development, and by doing that, it strongly recommends councils to implement parking management plans to manage parking supply and demand on-street.

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To give effect to UFTI, Tauranga City published a first Draft [Parking Strategy](#) and consulted on this in 2021. A final version was endorsed by Council on 15 November 2021. It is noted this strategy does not apply to the Western Bay of Plenty's centres. The key element of the TCC Parking Strategy is the need to manage supply and demand to an 85% occupancy. This is important, as when parking is not managed well and leading to a close to 100% occupancy, visitors will have severe difficulties to find a free space, impacting on the attractiveness of a centre, leading to drivers circulating sometimes for a long time in the hope to find a space.

To give effect to the TCC Parking Strategy, it is anticipated that over time all of Tauranga's centres will have a Parking Management Plan, providing a detailed plan for how the supply and demand of car parking in a specific area can be best managed.

**Theme 7 – Managed Lanes**

One person suggested managed lanes specifically as a way to improve productivity of roads (T2/T3/bus), but it is acknowledged that the 16 submissions on Public Transport (theme 2) also refer to improvements to public transport which often relies on managed lanes.

The Strategy includes a directive to provide frequent and reliable public transport, but how this is achieved in terms of bus lanes or high occupancy vehicle lanes is a level of detail considered in subsequent projects.

A managed lane study for the Western Bay of Plenty region is currently underway, with initial recommendations expected mid-2024. This is to supplement the broader Public Transport Services and Infrastructure business case, which BOPRC is leading, to further define the indicative public transport network and infrastructure required to service the Western Bay of Plenty sub-region.

A network response is required in order to understand where managed lanes (being T2, T3, Bus, Freight lanes – including a combination of modes) would have network benefits, without significantly adversely affecting overall network performance. The study will assess where managed lanes could provide for the greatest number of users, how it could improve travel time for buses, and include a hierarchy of users. It will do so by avoiding significant impact on other users.

Once proposed network changes have been drafted through the PT Services & Infrastructure business case and managed lanes study, community engagement on the proposals will be undertaken and submissions from the public will be considered.

**Theme 8 – Resilience**

Three submissions refer to the topic of environmental and climate resilience of the transport network. The example of 2023's extreme weather events is referenced. The submitters suggest that planning and design of infrastructure with suitable urban amenity considers resilience and responds to a changing climate.

The Strategy notes that we will have challenges adapting to the impacts of climate change, particularly from increased intensity of extreme rainfall events for

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communities in floodable areas and those located on estuary and harbour coastlines that are susceptible to erosion and inundation (p50).

The Strategy strongly acknowledges the challenge presented by a changing climate and the approach to improved resilience in several ways:

- through the Environmental objective of 'respond and adapt to climate change'
- through Challenge Four which states that 'adapting to the impacts of climate change... will be a significant challenge'
- through the growth directive that prescribes 'transport solutions are future-proofed, adaptable, resilient and integrated with the system view'
- through the principles and directives outlined in Chapter 3 Climate Resilience and Chapter 8 Transport (in particular and climate change is also considered across other topics)

Outside of the Strategy, a collaborative natural hazard programme involving detailed modelling of hazard scenarios has included reviewing the risk of natural hazards and high groundwater in low-lying coastal communities. This work has included undertaking area-based natural hazard susceptibility mapping for the sub-region, a city-wide risk assessment for Tauranga and detailed risk assessments for the urban growth areas of Ōmokoroa, Te Tumu and Tauriko West. Other complete or ongoing climate resilience projects include:

- Tauranga Infrastructure Resilience Programme
- Bay of Plenty Regional Council Climate Change Action Plan 2021,
- Western Bay of Plenty District Council Climate Change Action Plan 2021 and
- Tauranga City Council Climate Action and Investment Plan and Nature and Biodiversity Action and Investment Plan.

### **Theme 9 – Ferries**

Four submissions consider ferries as a potential transport option. Three submissions ask for ferries to be considered, or as a minimum considered for the future. One further submission asks for the potential of new transport modes and service delivery models to be explored, in tandem with on-demand public transport, passenger rail, ferries, and Park-and-Rides. The submitters ask whether the region is gathering data on what people actually use and in what circumstances.

The draft SmartGrowth Strategy refers to ferries in the introduction of Chapter 8 where it notes: 'exploring the potential for new models and service delivery models including on-demand public transport, passenger rail and ferries, park and ride'.

The UFTI final report notes that two of the UFTI spatial programmes considered ferries, and that ferries are also included in the recommended UFTI Programme 'Connected Centres'. The Connected Centre programme includes an activity to complete investigations into a Mount Maunganui to CBD Ferry connections and convert into a business case. This is subsequently also included in the Transport System Plan (TSP). The TSP also included an activity to complete a ferry feasibility study in the first three years of the programme.

Several high-level studies have been undertaken since the UFTI programme was delivered, including a 6-week trial through the 'Wednesday Challenge'. In November a more detailed feasibility study was delivered. This latest feasibility study was presented

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to the Public Transport Committee (PTC) on 14 November 2023. A copy of the council report including the Feasibility Study can be found in Agenda Item 10.2:

[https://infocouncil.boprc.govt.nz/Open/2023/11/PTC\\_20231114\\_AGN\\_3629\\_AT.PDF](https://infocouncil.boprc.govt.nz/Open/2023/11/PTC_20231114_AGN_3629_AT.PDF)

In key conclusions of the study can be summarised as:

- There are significant cost barriers to ferries, including significant capital investment in vessels and infrastructure, for areas where the level of growth is unlikely to justify such investment for a mode that is only useful to travel to a single destination.
- In the short to medium term it would seem prudent to continue the work already underway to make best use of the existing bus based public transport network supported by appropriate levels of priority and infrastructure.
- The option of future ferry services should be preserved, with the ongoing monitoring of appropriate triggers for the viability of implementing a ferry service.

At the Public Transport Committee (PTC) meeting on 14 November 2023, the PTC decided based on current cost and uptake estimates, a ferry service is not financially viable and further decisions or investments are deferred to the 2027 long term plan.

### **Theme 10 – Park and Ride facilities and services**

Seven submissions referred to the theme of Park and Ride facilities and services, all of these are supportive of the region investing in park and ride facilities and services. Specific locations were mentioned, including Omokoroa, Te Puke, BayPark, Tauriko, and near Totara Street. Most submitters consider park and rides to resolve parking issues in key centres.

Park and Rides are included in the Draft SmartGrowth Strategy, e.g. in the Development Infrastructure Table on pages 151, 165, 170.

Tauranga City Council adopted its Parking Strategy in 2021 (also refer to the Theme Car Parking above), which includes some key factors that are required for a successful Park and Ride;

- A. A cost advantage for users where the cost of a two-way bus ticket is attractively lower than the cost of driving and parking in the CBD
- B. Traffic congestion on CBD routes and bus priority that provides bus users a travel time advantage
- C. Frequent public transport services that minimise delay for car – bus transfers (e.g. 10–15 min headway)
- D. Close proximity to arterial routes so the site is convenient to access for car drivers and bus users.

The Bay of Plenty's RTP also includes a Policy on Park and Rides (Policy 4.2 and 4.5). These policies note to promote integration between public transport and other modes by (among others) '*Identifying and developing locations considered suitable for park and ride facilities consistent with policy 4.5*'. Policy 4.5 provides principles to be applied when investigating and developing park and ride facilities.

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Due to a lack of parking pricing or relatively low parking prices in most of Tauranga's centres, park and rides currently don't deliver on these objectives. Potential sites for Park and Rides are however being investigated through the PT Services and Infrastructure Business Case, a combined business case undertaken by BOPRC, NZ Transport Agency-Waka Kotahi and TCC. The business case is expected to be completed in 2024 and will be consulted upon accordingly.

UFTI identified several potential Park and Ride locations. WBOPDC do not have any park and ride facilities planned other than those proposed by UFTI as part of the Connected Centres programme.

### **Theme 11 – Emissions and Air Pollution**

Four submitters discuss the topic of emissions and air pollution, although more generally those commenting on the need for improved public transport, passenger trains, and walking/cycling improvements often mention these mode of transport being required to reduce emissions too.

One submitter notes that air pollution should be the region's top priority, suggesting to limit traffic until air pollution returns to safe levels. Another submitter notes the importance of intensification as a means to reduce emissions from transport. Two other submissions note a lack of evidence on how the SmartGrowth strategy will reduce carbon emissions, and that further evidence (a robust analysis around carbon emissions, including embodied carbon) should be provided.

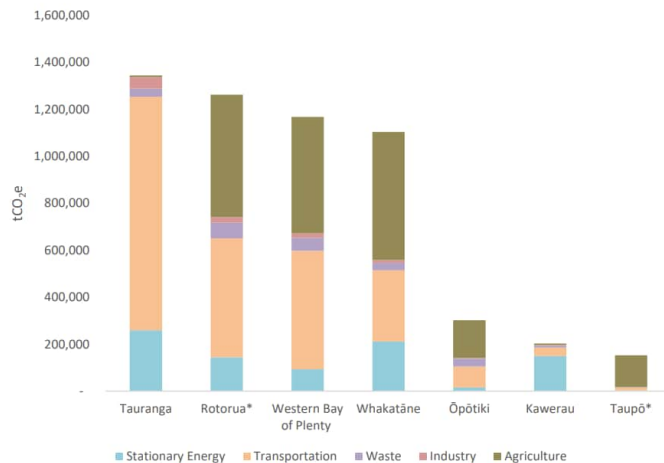
The Strategy identifies emissions as a key challenge facing the sub-region "Projected transport emissions are significantly higher than the 41% reduction targeted in the Emissions Reduction Plan. Vehicle emissions are contributing to early deaths, raised hospital admissions, and increased childhood asthma levels in our communities". Several directives aim to reduce emissions, notably within the climate resilience and transport topics.

BOPRC recently updated the Community Carbon Footprint analysis which includes carbon emission estimates for the sub region. This identifies Tauranga and the Western Bay of Plenty (and Rotorua) as the highest carbon emitters in the region. Transport and agriculture are the highest emitting industries.

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Emissions by area and source (BOPRC, Community Carbon Footprint, 2022)

The following documents and project are relevant in this context:

- The Transport System Plan's (TSP) main goal is to make it easier for people to access things like schools, jobs, healthcare and shops, in different ways (walking, cycling, buses or vehicles). It will help a cleaner environment by reducing transport-related greenhouse gas emissions, by making sure people can access what they need to without having to travel far or needing to drive and thus providing mode choice.
- The Emission Reduction Plan (ERP) notes that Transport is one of our largest sources of greenhouse gas emissions and is responsible for 17% of NZ's gross emissions, and 39% of NZ's CO2 emissions. In this context, growth predictions show in order to meet Tauranga's housing demands, an up and out strategy is required, hence growth areas of Tauriko West (amongst others) have been identified.
- Modelling undertaken as part of UFTI Connected Centres programme shows the reduction in transport related emissions and air pollution. [This modelling](#) is considered to be conservative and there is potential for further reductions with an increase in mode shift (which could occur with a prioritisation of investment in a truly multimodal transport system).
- Electric vehicle uptake in New Zealand will help with CO2 emissions, resulting in cleaner air as vehicles are driving, but electric vehicles will not help to mitigate or reduce vehicular congestion problems. Bay of Plenty Regional Council will be procuring electric buses in the future, which is in line with Central Government's requirements that the entire bus fleet in New Zealand will be electric by 2035.
- Plan Change 33 is TCC's proposed City Plan change to enable much greater residential densities, however, these land use changes do take time, and occur in an incremental way.
- BOPRC is working on a transport emissions reduction programme to outline the initiatives being delivered regionally to reduce emissions from transport.

Due to the context of some of the submissions on this theme regarding opportunities to reduce emissions, it would be relevant to reference TCC's Climate Action and Investment Plan (CIAP) in the draft Strategy for consistency.

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Embodied carbon is typically assessed at a project level rather than at a programme level, to have the detail required to assess this metric. The TSP identifies future projects, but business cases for these projects will identify preferred embodied carbon reduction options. At a TSP program level, an embodied carbon assessment would be based on too many assumptions to provide reliable outcomes.

In response to one submission (#91) about new technologies, it can be noted that one of the Transport Growth Directives within the SmartGrowth strategy is that 'Technology to reduce transport emissions and improve safety and efficiency is adopted and promoted.' In the transport programme this will occur through the delivery of the Transport System Plan and its continued oversight via the TSP Governance Group. This way the programme is adaptable and new technologies can be adopted as and when beneficial.

In response to one submission (#91) about carbon emission analysis, detailed transport carbon emissions analysis is included in the BOPRC Community Carbon Footprint. Detailed embodied and emitted carbon analysis is more suitable and included in reporting for the Transport System Plan. The WBOP sub-region was also developing a vehicle kilometre travelled reduction plan to achieve the VKT targets identified as necessary to achieve the emission targets within the Emissions Reduction Plan. Although the VKT Reduction Programme has since been ended by the new Minister of Transport, its objectives to provide mode choice align with the draft SmartGrowth Strategy and UFTI. Although it should be noted that the intent of this plan is subject to political and policy direction changes. As such the plan will likely focus more on emissions and congestion reduction requirements.

## **Theme 12 – Miscellaneous**

### **A – Engagement on UFTI and the TSP:**

One submission (#91) noted a lack of engagement on UFTI and the TSP. Consultation on the Transport System Plan programme of activities was undertaken primarily as part of the development of the 2021-31 Long Term Plan. Both Tauranga City Council, Bay of Plenty Regional Council and Western Bay of Plenty District Council create and update their Long Term Plans every three years which then go out for public consultation before being approved. These plans outline the activities and budget required for the next 10 years. Similarly, the Bay of Plenty Regional Land Transport Plan (RLTP) prepared by the Regional Transport Committee (which includes members from the Regional Council, NZ Transport Agency-Waka Kotahi and all city and district councils in the region) is reviewed every 3 years and the public is given an opportunity to provide submissions. All TSP projects will progressively be included in these plans over the next 30 years.

The figure below is a summary of the UFTI stakeholder engagement activities.

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### Stakeholder Engagement

- Stakeholder engagement for UFTI has exceeded that of other similar projects due to well-established structures such as the SmartGrowth Forums.
- UFTI has undertaken thorough a stakeholder engagement process, using a co-design philosophy that seeks to ensure stakeholders are able to shape UFTI thinking at every turn.
- Stakeholder engagement is not a substitute for public engagement and SmartGrowth will undertake public consultation on the optimal programme via the Joint Spatial Plan process.
- Key stakeholder groups that have been the focus during the UFTI project include:
  - > Central government.
  - > UFTI partners including councils, Waka Kotahi NZ Transport Agency, iwi, MHUD and Priority One. This includes both staff and politicians within each organisation.
  - > Local iwi partners including He Manukura.
  - > Key local organisations such as the Port of Tauranga and Sustainable Business Network.
  - > Key local interest groups related to UFTI project outcomes, such as transport, housing, business, and the environment including the SmartGrowth Forums.
  - > Key national organisations/interest groups such as the AA, the Road Transport Forum and the New Zealand Green Building Council.
- Five in-person events with key stakeholders have been held since August 2019. Attendance at each of these events has involved 30-50 people.
- A stakeholder newsletter has been distributed to a database of 259 recipients to share new technical reports as they are released on to the UFTI website.
- In addition to formal stakeholder events, the UFTI team have spoken at several SmartGrowth Forum, Priority One and other stakeholder initiative events. Feedback from each event has been recorded and has fed into UFTI thinking.
- Written comments on the Interim Report were received from 12 organisations (including the SmartGrowth Forums). A summary of these comments and how they have been considered is available on the UFTI website.
- The AA surveyed 350 members in the sub-region about their preferences and provided useful technical evidence, published on the UFTI website.
- The UFTI website has been regularly updated with information and reports relating to the project and has become a credible and frequently visited source for stakeholders.

### B – Changes regarding the Government’s direction on transport

Whilst this topic did not come through engagement, the National Party has prepared a coalition agreement with both ACT and the NZ First party. Subsequently, all councils were informed by a letter (12 December 2023) from the new Minister of Transport that certain transport programmes were ended and that it intends to replace several policies and rules, which will be further detailed in a new Government Policy Statement (GPS) on Land Transport. The letter refers to setting speed limits, the Road to Zero Strategy and the Vehicle Kilometres Travelled (VKT) reduction programs.

Whilst political changes don’t directly impact the long-term goals of the SmartGrowth Strategy, it may influence funding prioritisation. The Strategy currently refers to several policy-specific themes. The Option Assessment (below) will assess potential changes to ensure the Strategy will be able to provide a high-level function without specific reference to individual policies, rules, or programmes.

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Options overview	
Theme 1 Passenger rail	
1A	<p><b>(Recommended (joint))</b> Include the need for a sub-regional passenger rail futureproofing study in the Implementation Plan.</p> <p>The Draft Strategy does make references to passenger rail on page 116 by noting it will ‘explore the potential for new modes and service delivery models including on-demand public transport, passenger rail and ferries, park and ride’.</p> <p>This is also in line with Policy 1.6 of the RPTP, allocate budget in either BOPRC’s RLTP and/or Tauranga’s next LTP (2024–2034) to undertake a Sub-regional Passenger Rail Futureproofing study. This would be done in collaboration with Kiwirail, utilising the existing railway network, and subject to its results prepare an investment plan to secure strategic land parcels to not preclude passenger rail in future.</p> <p>This option would require minor updates to the SmartGrowth Strategy to provide an overview (expanding the last bullet on page 116) of the proposed work by adding “Undertake a passenger rail futureproofing study, with partners, to better understand needs to enable this mode in future”. The action would be carried out through the Implementation Plan</p>
1B	<p><b>(Recommended (joint))</b> Minor changes to the Draft Strategy text, and include an inter-regional passenger rail Business Case in the Implementation Plan.</p> <p>The Draft Strategy does make references to passenger rail, but only refers to ‘exploring’ new modes. In line with Policy 1.6 of the RPTP, allocate budget in BOPRC’s RLTP to undertake a joint business case with the Waikato RC, in collaboration with Kiwirail, utilising the existing railway network.</p> <p>This option would require minor updates to the SmartGrowth Strategy to provide an overview (expanding the last bullet on page 116) of the proposed work: “Provide input to a Business Case into inter-regional passenger rail, through a Waikato–BOP partnership. This would also involve working in alignment with Ministry of Transport and Kiwirail on this topic, building on previous rail strategies developed over the last couple of decades”. The action would be carried out through the Implementation Plan.</p>

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1C	<p>No changes</p> <p>Note the submissions, but no changes to the Strategy nor the Implementation Plan and await government direction on passenger rail.</p>
<b>Theme 2 Improved Public Transport</b>	
2A	<p><b>(Recommended)</b> No change to the Strategy, due to sufficient discussion and referencing already included, along with budget in BOPRC's RLTP and TCC's LTP for investment in Bus Infrastructure (including Park and Rides) and the PT Services &amp; Infrastructure Business Case and the Managed Lane study being underway.</p> <p>These projects will feed into the Implementation Plan.</p>
<b>Theme 3 Investment in transport infrastructure</b>	
3A	<p><b>(Recommended):</b> Note the submissions, no changes to the Strategy. The SmartGrowth partnership, working across boundaries, continues to advocate for new funding and financing tools with central government reflective of government policy changes. Note: Investment priorities are to be informed by the new Government's Policy Paper on Land Transport (GPS) 2024-2027.</p>
<b>Theme 4 Transport for aging population and planning for all abilities</b>	
4A	<p>Note the submissions, no changes to the Strategy, and continue to work on improvements to the transport network for all ages and abilities (including those who aren't able to drive), continue with Parking Management Plans including mobility parking spaces, as well as undertaking Accessibility Audits as currently planned.</p>
4B	<p><b>(Recommended)</b> Note the submissions, continue to work with the projects as per Option 4A, but do make some minor improvements to the SmartGrowth Strategy.</p> <p>On page 117, paragraph 2, add: "Access includes catering for all ages and abilities, especially in light of anticipated demographic changes in the region. Councils have work underway in terms of infrastructure and service provision to reflect anticipated growth and demographic needs."</p> <p>The Implementation Plan will need to reflect the need to track and provide input to the projects that are underway in the region</p>

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	on infrastructure and service provisions as growth occurs and demographics change.
<b>Theme 5 Infrastructure for walking and cycling</b>	
5A	<b>(Recommended)</b> No changes to the Strategy, as this theme is well-reflected on pages 115, 117 and 118. Existing work is underway through the TSP programme, including investment in walking and cycling, and will need to be embedded in the Implementation Plan
5B	Note the submissions, no changes to the Strategy as this is well-reflected on pages 115, 117 and 118.  Bring forward / increase the funding in walking/cycling projects through the Implementation Plan to encourage more mode choice, noting this will require increased budget requirement in relevant Long Term Plans.
<b>Theme 6 car parking</b>	
6A	<b>(Recommended)</b> Note the submissions, no further changes to the SmartGrowth Strategy, as the Strategy refers to parking (e.g. page 115), and the TSP includes the topic of car parking. It is acknowledged that the TSP provides details on parking management for the region, while Tauranga's Parking Strategy provides more details for Tauranga City. TCC will continue to progress development of Parking Management Plans to ensure a balance in supply and demand for car parking.  WBOPDC will continue to provide off-street car parking facilities in the main town centres in accordance with the parking policy.
6B	As above, but include in the Implementation Plan further activities to investigate feasibility of more investment of parking in Tauranga's centres.
<b>Theme 7 Managed Lanes</b>	
7A	<b>(Recommended)</b> Note the submissions, no changes to the SmartGrowth Strategy as this is already reflected (e.g. pages 150 and 167).  Subject to the outcomes of both the Public Transport Services & Infrastructure Business Case and the Managed Lane Study,

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	additional implementation budget may be necessary (to be confirmed on the outcomes of these studies).
7B	As above, but subject to the outcomes of the Managed Lane Study, prioritise the roll-out of managed lanes, and bring forward budgets should a funding opportunity be available
<b>Theme 8 Resilience</b>	
8A	<p><b>(Recommended)</b> Noting the submissions and that the Strategy refers to resilience (pages 117, 118 and Appendix 1), make the following textual changes to the SmartGrowth Strategy to clarify the importance of resilience of the transport network:</p> <ul style="list-style-type: none"> <li>• Add reference to resilience studies, policies and plans that have been/are being developed by each of the SmartGrowth partners and the importance on building upon these.</li> <li>• Clarify that whilst the UFTI Connected Centres diagram shows a single connection between centres, network planning considers more than one physical route which promotes a resilient network.</li> </ul> <p>SmartGrowth Partners are progressing resilience-based projects. The Implementation Plan can further identify those.</p>
8B	Note the submissions but make no changes to the Strategy.
<b>Theme 9 Ferries</b>	
9A	<p><b>(Recommended)</b> Note the submissions, note the future option of ferries is referred in the Strategy (page 116), as well as in UFTI, the TSP and the RPTP. In line with decisions made at the Public Transport Committee meeting on 14 November 2023 to postpone further investment to the 2027 LTP, no further changes to be made.</p> <p>Should opportunities arise earlier, this can be considered through the implementation plan.</p>
<b>Theme 10 Park and Ride Facilities</b>	
10A	<p><b>(Recommended)</b> Note the submissions, no change to the SmartGrowth Strategy. The potential of Park and Ride facilities are already referenced in the SmartGrowth Strategy (e.g. page 116 and in Appendix 1) as well as in UFTI, the TSP and further work currently being undertaken through the Public Transport Services &amp; Infrastructure business case.</p> <p>Acknowledge in the Implementation Plan the continuation of using existing budget in TCC and WBOPDC's LTP's for investment</p>

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	in Bus Infrastructure and Park and Ride and Park and Rideshare sites.
<b>Theme 11 Emissions and air pollution</b>	
11A	<p><b>(Recommended)</b> Note the submissions, note that the Strategy refers to emissions substantially on page 116, however air pollution is not addressed.</p> <p>In addition to the targets on page 116 of the Strategy or the directives on page 118, include the importance of <i>'Reducing the impact of transport on air quality and emissions'</i> to cross-relate with the Te Taiao Environment and Climate Resilience chapters.</p>
11B	Note the submissions, but make no changes to the SmartGrowth Strategy, no new studies anticipated.
<b>Theme 12 Miscellaneous</b>	
12A	<p><b>(Recommended)</b> Whilst not mentioned directly within submissions, the Strategy makes reference to a few policies that have since been ended by the new government. Whilst a policy change doesn't change the SmartGrowth Strategy due to its high-level focus, the terms or names of these specific policies should be removed and instead focus on the objectives. This refers to the following:</p> <ul style="list-style-type: none"> <li>• VKT Reduction Plans (vehicle kilometre travelled) on pages 74, 116, 158. Instead refer to 'improving mode choice', which aligns with the objectives of UFTI and the TSP.</li> <li>• Road to Zero (safety programme) on page 164. Instead, refer to 'improving road safety'.</li> </ul>

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Option 1A, Include a sub-regional Passenger Rail transport futureproofing study in the Implementation Plan	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Allows the region to have in-depth information to enable future decision-making, allow for strategic property purchases if required.</li> <li>Provides clarify to stakeholders and the community about feasibility or the lack thereof</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Costs involved in study</li> <li>A study might be considered moving ahead of response to the Select Committee 'Inquiry into the future of inter-regional passenger rail in New Zealand'.</li> </ul>
<b>Financial implications</b>	
<b>Cost of undertaking study</b>	
<b>Other considerations</b>	
None	
Option 1B: Include a joint inter-regional passenger rail business case between BOPRC and Waikato Regional Council in the implementation plan	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Allows the region to have in-depth information to enable future decision-making, allow for strategic property purchases if required.</li> <li>Provides clarify to stakeholders and the community about feasibility or the lack thereof</li> <li>Provides detailed insight in the costs and benefits of activating passenger rail in the region.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Costs involved in undertaking the business case</li> <li>A study might be considered moving ahead of response to the Select Committee 'Inquiry into the future of inter-regional passenger rail in New Zealand'.</li> </ul>
<b>Financial implications</b>	
<b>Cost of undertaking the business case</b>	
<b>Other considerations</b>	
None	

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Option 1C: No changes to the strategy, not including a Passenger Rail futureproofing study nor a business case	
<b>Advantages</b> <ul style="list-style-type: none"> <li>No additional costs</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>No further information available, which may lead to a risk that strategic property required to enable a future passenger rail service may become more challenging in future.</li> <li>Uncertainty to remain, and questions continue to be asked by the community about passenger rail.</li> </ul>
<b>Financial implications</b>	
None	
<b>Other considerations</b>	
None	
Option 2A, No changes to current public transport planning	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Continue to follow existing planning processes for improving public transport in the Western Bay</li> <li>No changes to the process, allows projects such as the Public Transport Services &amp; Infrastructure Business Case, and projects to investigate upgraded bus interchanges to be completed.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Some community members may consider a more urgent need to improve the quality of the region's public transport network.</li> </ul>
<b>Financial implications</b>	
<i>none</i>	
<b>Other considerations</b>	
None	

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Option 3A – Investment in infrastructure, no changes to the strategy	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Work with central government and other organisations to investigate co-funding opportunities for infrastructure investments can continue as planned.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Alternative funding avenues not explicitly identified in the strategy .</li> </ul>
<b>Financial implications</b>	
<i>no changes proposed</i>	
<b>Other considerations</b>	
None	
Option 4A, Transport for an aging population, no changes to strategy	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Various studies and projects underway can proceed as planned without changes.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Demographic changes potentially not clearly addressed in the draft strategy.</li> <li>Not adapting the strategy may provide a lack of awareness of the need to improve the region's infrastructure for people with all abilities.</li> </ul>
<b>Financial implications</b>	
None	
<b>Other considerations</b>	
None	

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Option 4B: Transport for an aging population, making changes to the strategy	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Demographic changes potentially to be better recognised in the draft strategy.</li> <li>Updating the strategy increases awareness of the need to improve the region's infrastructure, for both an aging population and for people with all abilities.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>None</li> </ul>
<b>Financial implications</b>	
<i>None, due to existing projects in place</i>	
<b>Other considerations</b>	
<p>Updates to the SmartGrowth Strategy to include more data on the projected aging population and implications of this.</p> <p>It is noted that infrastructure for an aging population also benefits all users of modes of transport to be accessible for all abilities, and provide an overview of the work underway and planned for this theme.</p>	
Option 5A – No changes to planned walking and cycling projects	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Currently planned within the TSP can continue without change.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>All current projects are subject to co-funding from NZ Transport Agency-Waka Kotahi. The new government has noted it will be considering reduced investment in walking/cycling projects, which may result in a higher portion of funding required by local councils, or that projects may need to be postponed.</li> </ul>

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<b>Financial implications</b>
None
<b>Other considerations</b>
None

<b>Option 5B – Bringing forward investment in walking and cycling</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Due to the new government noting it will be considering reducing investment in walking/cycling projects, more local investment may be needed in order to continue to deliver the walking/cycling projects as anticipated.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Higher costs for the region.</li> </ul>
<b>Financial implications</b>	
Higher costs for Councils delivering walking and cycling projects with potential lower Government funding.	
<b>Other considerations</b>	
None	

<b>Option 6A – Car parking – continue developing Parking Management Plans, no changes to the strategy</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Work on parking management plans can continue to reduce the current subsidy on car parking', (in a status quo, or when any new parking management plans are delayed,).</li> <li>More effective parking management, which will improve the ability for users to find a parking space, opens up the market for private</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Due to parking typically having been provided for free, any change is likely to cause some community opposition.</li> </ul>

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investment, and reduces the need for investment in new parking spaces using ratepayers money.	
<b>Financial implications</b>	
None	
<b>Other considerations</b>	
None	
<b>Option 6B – Car parking – investigate increasing numbers</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Council investment in more parking supply is likely to keep parking availability at a high level.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Significant council investment required by all ratepayers, including those who don't drive.</li> <li>Users of parking spaces not paying the actual costs</li> <li>Limited opportunities for private investment</li> <li>Update of other modes of transport less attractive</li> </ul>
<b>Financial implications</b>	
<b><i>Significant, but further details to be confirmed</i></b>	
<b>Other considerations</b>	
None	
<b>Option 7A – Managed Lanes – no further changes to the strategy</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Existing workstreams underway can continue as planned.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Subject to the outcomes of both the Public Transport Services &amp; Infrastructure Business Case and the Managed Lane Study, additional implementation budget may be necessary (to be confirmed on the outcomes of these studies).</li> </ul>

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<b>Financial implications</b>
No change to planned investment.
<b>Other considerations</b>
None

<b>Option 7B – Managed Lanes Study – prioritise roll-out</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Managed lanes have the ability to encourage public transport use as well as carpooling, and therefore increase the capacity of infrastructure in terms of moving people.</li> <li>Subject to the outcomes of both the Public Transport Services &amp; Infrastructure Business Case and the Managed Lane Study, implementation could occur sooner.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Increased budget requirements.</li> </ul>
<b>Financial implications</b>	
Increased cost of bringing forward work and implementation.	
<b>Other considerations</b>	
None	

<b>Option 8A – Resilience – making changes to the strategy</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Better reflect the importance of the roading network to be resilient e.g. in the context of climate change.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Additional time and effort to change the Strategy</li> <li>Planned projects at risk of change</li> </ul>

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<b>Financial implications</b>
<b>None</b>
<b>Other considerations</b>
None

<b>Option 8B – Resilience – No changes to the strategy</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>No additional time and effort to change the Strategy</li> <li>Planned programmes can proceed without interruption or risk of change</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>None</li> </ul>
<b>Financial implications</b>	
None	
<b>Other considerations</b>	
None	

<b>Option 9A – Ferries – no changes to Strategy</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Aligns with decision of the Public Transport Committee (14 November 2023).</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Ferries are not progressed in the short term, although this could be an advantage given the poor financial viability of a ferry service</li> </ul>
<b>Financial implications</b>	
<b>None</b>	

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<b>Other considerations</b>
The future option of ferries is included in both UFTI, the TSP and the RPTP. In line with line with decisions made at the Public Transport committee meeting on 14 November 2023 (postpone further investment to the 2027 LTP) no further changes to be made.

**Option 10A – Park and Ride Facilities and services – No changes to Strategy**

<b>Advantages</b> <ul style="list-style-type: none"> <li>No further spend on park and ride investigations outside of existing projects such as the PT infrastructure and services business case.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Some submissions may consider that park and rides should be delivered sooner and this might not happen.</li> </ul>
<b>Financial implications</b>	
None	
<b>Other considerations</b>	
None	

**Option 11A – Theme Emissions and air pollution – making changes to the strategy**

<b>Advantages</b> <ul style="list-style-type: none"> <li>Underlines the role that transport plays in air pollution (not just greenhouse gas emissions).</li> <li>Acknowledge that each council is undertaking work on this topic.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>None</li> </ul>
<b>Financial implications</b>	

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<b>None</b>
<b>Other considerations</b>
none.

<b>Option 11B – Theme Emissions and air pollution, no changes to the strategy</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>No delay to updating the Strategy</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>The Strategy would not clearly reflect the role of transport in on local air pollution.</li> <li>The strategy would not clearly reflect the work being undertaken in this space by each council.</li> </ul>
<b>Financial implications</b>	
<b>None</b>	
<b>Other considerations</b>	
None.	

<b>Option 12A – Update reference to policy-specific programmes that have been ended</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Keeps the Strategy long-term and enable potential prioritisations to happen based on current and future governments' priorities.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>None.</li> </ul>
<b>Financial implications</b>	
<b>None</b>	
<b>Other considerations</b>	

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Recommended Decision
Theme 1: Passenger Rail
<p><b>Option 1A: (joint)</b> Include the need for a sub-regional passenger rail futureproofing study in the Implementation Plan.</p> <p>The Draft Strategy does make references to passenger rail on page 116 by noting it will ‘explore the potential for new modes and service delivery models including on-demand public transport, passenger rail and ferries, park and ride’.</p> <p>This is also in line with Policy 1.6 of the RPTP, allocate budget in either BOPRC’s RLTP and/or Tauranga’s next LTP (2024-2034) to undertake a Sub-regional Passenger Rail Futureproofing study. This would be done in collaboration with Kiwirail, utilising the existing railway network, and subject to its results prepare an investment plan to secure strategic land parcels to not preclude passenger rail in future.</p> <p>This option would require minor updates to the SmartGrowth Strategy to provide an overview (expanding the last bullet on page 116) of the proposed work by adding “Undertake a passenger rail futureproofing study, with partners, to better understand needs to enable this mode in future”. The action would be carried out through the Implementation Plan</p>
<p><b>Option 1B: (joint)</b> Minor changes to the Draft Strategy text, and include an inter-regional passenger rail Business Case in the Implementation Plan.</p> <p>The Draft Strategy does make references to passenger rail, but only refers to ‘exploring’ new modes. In line with Policy 1.6 of the RPTP, allocate budget in BOPRC’s RLTP to undertake a joint business case with the Waikato RC, in collaboration with Kiwirail, utilising the existing railway network.</p> <p>This option would require minor updates to the SmartGrowth Strategy to provide an overview (expanding the last bullet on page 116) of the proposed work: “Provide input to a Business Case into inter-regional passenger rail, through a Waikato-BOP partnership. This would also involve working in alignment with Ministry of Transport and Kiwirail on this topic, building on previous rail strategies developed over the last couple of decades”. The action would be carried out through the Implementation Plan.</p>
Theme 2: Improved Public Transport
<p><b>Option 2A:</b> No change to the Strategy, due to sufficient discussion and referencing already included, along with budget in BOPRC’s RLTP and</p>

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<p>TCC's LTP for investment in Bus Infrastructure (including Park and Rides) and the PT Services &amp; Infrastructure Business Case and the Managed Lane study being underway.</p> <p>These projects will feed into the Implementation Plan.</p>
<p><b>Theme 3: Investment in Transport Infrastructure</b></p> <p><b>Option 3A:</b> Note the submissions, no changes to the Strategy. The SmartGrowth partnership, working across boundaries, continues to advocate for new funding and financing tools with central government reflective of government policy changes. Note: Investment priorities are to be informed by the new Government's Policy Paper on Land Transport (GPS) 2024-2027.</p>
<p><b>Theme 4: Transport for Ageing Population and Planning for all Abilities</b></p> <p><b>Option 4B:</b> Note the submissions, continue to work with the projects as per Option 4A, but do make some minor improvements to the SmartGrowth Strategy.</p> <p>On page 117, paragraph 2, add: "Access includes catering for all ages and abilities, especially in light of anticipated demographic changes in the region. Councils have work underway in terms of infrastructure and service provision to reflect anticipated growth and demographic needs."</p> <p>The Implementation Plan will need to reflect the need to track and provide input to the projects that are underway in the region on infrastructure and service provisions as growth occurs and demographics change.</p>
<p><b>Theme 5: Infrastructure for Walking and Cycling</b></p> <p><b>Option 5A:</b> No changes to the Strategy, as this theme is well-reflected on pages 115, 117 and 118. Existing work is underway through the TSP programme, including investment in walking and cycling, and will need to be embedded in the Implementation Plan</p>
<p><b>Theme 6: Car Parking</b></p> <p><b>Option 6A:</b> Note the submissions, no further changes to the SmartGrowth Strategy, as the Strategy refers to parking (e.g. page 115), and the TSP includes the topic of car parking. It is acknowledged that the TSP provides details on parking management for the region, while Tauranga's Parking Strategy provides more details for Tauranga City. TCC will continue to progress development of Parking Management Plans to ensure a balance in supply and demand for car parking.</p>

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WBOPDC will continue to provide off-street car parking facilities in the main town centres in accordance with the parking policy.
<b>Theme 7: Managed Lanes</b>
<p><b>Option 7A:</b> Note the submissions, no changes to the SmartGrowth Strategy as this is already reflected (e.g. pages 150 and 167).</p> <p>Subject to the outcomes of both the Public Transport Services &amp; Infrastructure Business Case and the Managed Lane Study, additional implementation budget may be necessary (to be confirmed on the outcomes of these studies).</p>
<b>Theme 8: Resilience</b>
<p><b>Option 8A:</b> Noting the submissions and that the Strategy refers to resilience (pages 117, 118 and Appendix 1), make the following textual changes to the SmartGrowth Strategy to clarify the importance of resilience of the transport network:</p> <ul style="list-style-type: none"> <li>• Add reference to resilience studies, policies and plans that have been/are being developed by each of the SmartGrowth partners and the importance on building upon these.</li> <li>• Clarify that whilst the UFTI Connected Centres diagram shows a single connection between centres, network planning considers more than one physical route which promotes a resilient network.</li> </ul> <p>SmartGrowth Partners are progressing resilience-based projects. The Implementation Plan can further identify those.</p>
<b>Theme 9: Ferries</b>
<p><b>Option 9A:</b> Note the submissions, note the future option of ferries is referred in the Strategy (page 116), as well as in UFTI, the TSP and the RPTP. In line with decisions made at the Public Transport Committee meeting on 14 November 2023 to postpone further investment to the 2027 LTP, no further changes to be made.</p> <p>Should opportunities arise earlier, this can be considered through the implementation plan.</p>
<b>Theme 10: Park and Ride Facilities</b>
<p><b>Option 10A:</b> Note the submissions, no change to the SmartGrowth Strategy. The potential of Park and Ride facilities are already referenced in the SmartGrowth Strategy (e.g. page 116 and in Appendix 1) as well as in UFTI, the TSP and further work currently being undertaken through the Public Transport Services &amp; Infrastructure business case.</p>

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Acknowledge in the Implementation Plan the continuation of using existing budget in TCC and WBOPDC's LTP's for investment in Bus Infrastructure and Park and Ride and Park and Rideshare sites.

### Theme 11: Emissions and Air Pollution

**Option 11A:** Note the submissions, note that the Strategy refers to emissions substantially on page 116, however air pollution is not addressed.

In addition to the targets on page 116 of the Strategy or the directives on page 118, include the importance of '*Reducing the impact of transport on air quality and emissions*' to cross-relate with the Te Taiao Environment and Climate Resilience chapters.

### Theme 12: Miscellaneous

**Option 12A:** Whilst not mentioned directly within submissions, the Strategy makes reference to a few policies that have since been ended by the new government. Whilst a policy change doesn't change the SmartGrowth Strategy due to its high-level focus, the terms or names of these specific policies should be removed and instead focus on the objectives. This refers to the following:

- VKT Reduction Plans (vehicle kilometre travelled) on pages 74, 116, 158. Instead refer to 'improving mode choice', which aligns with the objectives of UFTI and the TSP.
- Road to Zero (safety programme) on page 164. Instead, refer to 'improving road safety'.

### Decision – Theme 1: Passenger Rail

**Option 1A: (joint)** Include the need for a sub-regional passenger rail futureproofing study in the Implementation Plan.

The Draft Strategy does make references to passenger rail on page 116 by noting it will 'explore the potential for new modes and service delivery models including on-demand public transport, passenger rail and ferries, park and ride'.

This is also in line with Policy 1.6 of the RPTP, allocate budget in either BOPRC's RLTP and/or Tauranga's next LTP (2024-2034) to undertake a Sub-regional Passenger Rail Futureproofing study. This would be done in collaboration with Kiwirail, utilising the existing railway network, and subject to its results prepare an investment plan to secure strategic land parcels to not preclude passenger rail in future.

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This option would require minor updates to the SmartGrowth Strategy to provide an overview (expanding the last bullet on page 116) of the proposed work by adding “Undertake a passenger rail futureproofing study, with partners, to better understand needs to enable this mode in future”. The action would be carried out through the Implementation Plan.

**Option 1B: (joint)** Minor changes to the Draft Strategy text, and include an inter-regional passenger rail Business Case in the Implementation Plan.

The Draft Strategy does make references to passenger rail, but only refers to ‘exploring’ new modes. In line with Policy 1.6 of the RPTP, allocate budget in BOPRC’s RLTP to undertake a joint business case with the Waikato RC, in collaboration with Kiwirail, utilising the existing railway network.

This option would require minor updates to the SmartGrowth Strategy to provide an overview (expanding the last bullet on page 116) of the proposed work: “Provide input to a Business Case into inter-regional passenger rail, through a Waikato-BOP partnership. This would also involve working in alignment with Ministry of Transport and Kiwirail on this topic, building on previous rail strategies developed over the last couple of decades”. The action would be carried out through the Implementation Plan.

#### Reason

- Allows the region to have in-depth information to enable future decision-making, allow for strategic property purchases if required.
- Provides clarify to stakeholders and the community about feasibility or the lack thereof
- Allows the region to have in-depth information to enable future decision-making, allow for strategic property purchases if required.
- Provides clarify to stakeholders and the community about feasibility or the lack thereof
- Provides detailed insight in the costs and benefits of activating passenger rail in the region.

#### Decision – Theme 2: Improved Public Transport

**Option 2A:** No change to the Strategy, due to sufficient discussion and referencing already included, along with budget in BOPRC’s RLTP and TCC’s LTP for investment in Bus Infrastructure (including Park and Rides) and the PT Services & Infrastructure Business Case and the Managed Lane study being underway.

These projects will feed into the Implementation Plan.

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Reason
<ul style="list-style-type: none"> <li>Continue to follow existing planning processes for improving public transport in the Western Bay</li> <li>No changes to the process, allows projects such as the Public Transport Services &amp; Infrastructure Business Case, and projects to investigate upgraded bus interchanges to be completed.</li> </ul>
Decision – Theme 3: Investment in Transport Infrastructure
<p><b>Option 3A:</b> Note the submissions, no changes to the Strategy. The SmartGrowth partnership, working across boundaries, continues to advocate for new funding and financing tools with central government reflective of government policy changes. Note: Investment priorities are to be informed by the new Government's Policy Paper on Land Transport (GPS) 2024-2027.</p>
Reason
<ul style="list-style-type: none"> <li>Work with central government and other organisations to investigate co-funding opportunities for infrastructure investments can continue as planned.</li> </ul>
Decision – Theme 4: Transport for Ageing Population and Planning for all Abilities
<p><b>Option 4B:</b> Note the submissions, continue to work with the projects as per Option 4A, but do make some minor improvements to the SmartGrowth Strategy.</p> <p>On page 117, paragraph 2, add: "Access includes catering for all ages and abilities, especially in light of anticipated demographic changes in the region. Councils have work underway in terms of infrastructure and service provision to reflect anticipated growth and demographic needs." The Implementation Plan will need to reflect the need to track and provide input to the projects that are underway in the region on infrastructure and service provisions as growth occurs and demographics change.</p>
Reason
<ul style="list-style-type: none"> <li>Demographic changes potentially to be better recognised in the draft strategy.</li> <li>Updating the strategy increases awareness of the need to improve the region's infrastructure, for both an aging population and for people with all abilities.</li> </ul>
Decision – Theme 5: Infrastructure for Walking and Cycling
<p><b>Option 5A:</b> No changes to the Strategy, as this theme is well-reflected on pages 115, 117 and 118. Existing work is underway through the TSP</p>

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programme, including investment in walking and cycling, and will need to be embedded in the Implementation Plan
<b>Reason</b>
<ul style="list-style-type: none"> <li>Currently planned within the TSP can continue without change.</li> </ul>
<b>Decision – Theme 6: Car Parking</b>
<p><b>Option 6A:</b> Note the submissions, no further changes to the SmartGrowth Strategy, as the Strategy refers to parking (e.g. page 115), and the TSP includes the topic of car parking. It is acknowledged that the TSP provides details on parking management for the region, while Tauranga's Parking Strategy provides more details for Tauranga City. TCC will continue to progress development of Parking Management Plans to ensure a balance in supply and demand for car parking.</p> <p>WBOPDC will continue to provide off-street car parking facilities in the main town centres in accordance with the parking policy.</p>
<b>Reason</b>
<ul style="list-style-type: none"> <li>Work on parking management plans can continue to reduce the current subsidy on car parking', (in a status quo, or when any new parking management plans are delayed,).</li> <li>More effective parking management, which will improve the ability for users to find a parking space, opens up the market for private investment, and reduces the need for investment in new parking spaces using ratepayers money.</li> </ul>
<b>Decision – Theme 7: Managed Lanes</b>
<p><b>Option 7A:</b> Note the submissions, no changes to the SmartGrowth Strategy as this is already reflected (e.g. pages 150 and 167).</p> <p>Subject to the outcomes of both the Public Transport Services &amp; Infrastructure Business Case and the Managed Lane Study, additional implementation budget may be necessary (to be confirmed on the outcomes of these studies).</p>
<b>Reason</b>
<ul style="list-style-type: none"> <li>Existing workstreams underway can continue as planned.</li> </ul>
<b>Decision – Theme 8: Resilience</b>
<p><b>Option 8A:</b> Noting the submissions and that the Strategy refers to resilience (pages 117, 118 and Appendix 1), make the following textual changes to the SmartGrowth Strategy to clarify the importance of resilience of the transport network:</p> <ul style="list-style-type: none"> <li>Add reference to resilience studies, policies and plans that have been/are being developed by each of the SmartGrowth partners and the importance on building upon these.</li> </ul>

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<ul style="list-style-type: none"> <li>Clarify that whilst the UFTI Connected Centres diagram shows a single connection between centres, network planning considers more than one physical route which promotes a resilient network.</li> </ul> <p>SmartGrowth Partners are progressing resilience-based projects. The Implementation Plan can further identify those.</p>
<b>Reason</b>
<ul style="list-style-type: none"> <li>Better reflect the importance of the roading network to be resilient e.g. in the context of climate change.</li> </ul>
<b>Decision – Theme 9: Ferries</b>
<p><b>Option 9A:</b> Note the submissions, note the future option of ferries is referred in the Strategy (page 116), as well as in UFTI, the TSP and the RPTP. In line with decisions made at the Public Transport Committee meeting on 14 November 2023 to postpone further investment to the 2027 LTP, no further changes to be made.</p> <p>Should opportunities arise earlier, this can be considered through the implementation plan.</p>
<b>Reason</b>
<ul style="list-style-type: none"> <li>Aligns with decision of the Public Transport Committee (14 November 2023).</li> </ul>
<b>Decision – Theme 10: Park and Ride Facilities</b>
<p><b>Option 10A:</b> Note the submissions, no change to the SmartGrowth Strategy. The potential of Park and Ride facilities are already referenced in the SmartGrowth Strategy (e.g. page 116 and in Appendix 1) as well as in UFTI, the TSP and further work currently being undertaken through the Public Transport Services &amp; Infrastructure business case.</p> <p>Acknowledge in the Implementation Plan the continuation of using existing budget in TCC and WBOPDC's LTP's for investment in Bus Infrastructure and Park and Ride and Park and Rideshare sites.</p>
<b>Reason</b>
<ul style="list-style-type: none"> <li>No further spend on park and ride investigations outside of existing projects such as the PT infrastructure and services business case.</li> </ul>
<b>Decision – Theme 11: Emissions and Air Pollution</b>
<p><b>Option 11A:</b> Note the submissions, note that the Strategy refers to emissions substantially on page 116, however air pollution is not addressed.</p> <p>In addition to the targets on page 116 of the Strategy or the directives on page 118, include the importance of <i>'Reducing the impact of transport on</i></p>

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<i>air quality and emissions'</i> to cross-relate with the Te Taiao Environment and Climate Resilience chapters.
<b>Reason</b>
<ul style="list-style-type: none"><li>• Underlines the role that transport plays in air pollution (not just greenhouse gas emissions).</li><li>• Acknowledge that each council is undertaking work on this topic.</li></ul>
<b>Decision – Theme 12: Miscellaneous</b>
<p><b>Option 12A:</b> Whilst not mentioned directly within submissions, the Strategy makes reference to a few policies that have since been ended by the new government. Whilst a policy change doesn't change the SmartGrowth Strategy due to its high-level focus, the terms or names of these specific policies should be removed and instead focus on the objectives. This refers to the following:</p> <ul style="list-style-type: none"><li>• VKT Reduction Plans (vehicle kilometre travelled) on pages 74, 116, 158. Instead refer to 'improving mode choice', which aligns with the objectives of UFTI and the TSP.</li><li>• Road to Zero (safety programme) on page 164. Instead, refer to 'improving road safety'.</li></ul>
<b>Reason</b>
<ul style="list-style-type: none"><li>• Keeps the Strategy long-term and enable potential prioritisations to happen based on current and future governments' priorities.</li></ul>

**Date approved:****Approved by:**

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# SmartGrowth Strategy 2023–2073

## ISSUES AND OPTIONS PAPER

### Rural

**Author: Tracey Miller**

<b>Topic</b>	SGS23-05 – Rural
<b>Issue</b>	<ol style="list-style-type: none"> <li>1. Ensuring the protection of rural land, in particular highly productive land</li> <li>2. Looking after rural communities</li> <li>3. Opportunities for rural residential / lifestyle living</li> <li>4. A more enabling approach for housing on rural properties</li> </ol>

#### Staff Narrative

Overview of feedback received

Eight submissions were received on the Rural topic from:

- Goodall, Andrew
- Hayley
- Bowden, Beth
- Robson, John
- Envirohub
- Upper Ohauiti Landowners Group
- Underwood, Ruth
- New Zealand Kiwifruit Growers
- Foster, Andrew
- Ngai Tukairangi Hapu Trust

Two submitters raised matters in relation to the Rural chapter at the hearings on 4 and 5 December 2023, being The Child Poverty Action Group and LandPlay.

Note that other submitters may have referred to rural matters in their submissions but those matters have been addressed in other more appropriate Issues and Options Papers (IOP). For example, Upper Ohauiti Landowners Group/ Land Play has been addressed in the Future Development Strategy IOP.

A lot of the feedback received was consistent with what is proposed through the Rural Chapter of the Strategy. The following commentary is provided on the key themes of submission.

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The submissions can be categorised into the following themes:

1. Ensuring the protection of rural land, in particular highly productive land
2. Looking after rural communities
3. Opportunities for rural residential / lifestyle living
4. A more enabling approach for housing on rural properties

### **Ensuring the protection of rural land**

The majority of submitters supported the approach of the rural chapter and seek that the current approach in relation to ensuring the protection of rural land is retained. There are a range of existing policy provisions in place to ensure the protection of rural land including the National Policy Statement for Highly Productive Land, which remains in place at the time of drafting this IOP. Bay of Plenty Regional Council (BOPRC) is in the process of identifying and mapping areas of highly productive land to be protected for rural productive purposes in accordance with the requirements of the NPS-HPL. BOPRC will then need to update its Regional Policy Statement, by way of maps, showing all the land in the region that is protected by the NPS-HPL.

The Regional Policy Statement (RPS) provides a framework for sustainably managing the region's natural and physical resources. It provides objectives, policies and methods that the city and district councils must give effect to in their Plans and through implementation of resource consents.

Urban and rural growth management is considered in Section 2.8 of the RPS. The RPS identifies that accommodating and managing growth can be a challenge particularly given the importance of primary industries (agriculture, horticulture, forestry, quarrying and mining) to the economy.

Both the Tauranga City Plan and Western Bay of Plenty District Plan have stringent rural subdivision rules to ensure the protection of rural land.

It was expressed through submissions that the protection of rural land is particularly important to provide suitable land for key local industries, in particular avocado and kiwifruit. Horticultural land with suitable elevation, specific soil characteristics and terrain are particularly important to protect as prime growing land is competing with land for housing. Once land has been lost to housing it is gone forever. Horticultural land must be protected as it is the economic basis for the region.

One submitter noted the importance of rural land and the necessity of ensuring the preservation of the rural character from nearby urban expansions.

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As mentioned above, the importance of protecting the rural environment to ensure land can continue to be used for important rural activities such as productive purposes, critical for the sub-regional economy has been identified through submissions. Due to urban expansion and the need for new housing, rural areas face continuing pressure for greenfield development.

The SmartGrowth Strategy identifies areas of land known as Priority Development Areas (PDA's) in the Future Development Strategy section of the Strategy. The Priority Development Areas have long been recognised as future growth areas and have associated programmes of work to endeavour to realise development potential. However unplanned and out of sequence development can and still occurs, particularly through private plan change requests.

No further evaluation of these submissions is necessary because there are no practicable options to address these matters through the SmartGrowth Strategy. Highly Productive Land is protected through a National Policy Statement and in addition both the City and District Council have stringent rules in place to protect both productive and highly productive land. Subdivision in the rural zones is discouraged to ensure protection of versatile land. Therefore, it is considered that the best protection mechanisms possible are already in place.

#### **Looking after rural communities**

It was highlighted by some submitters that farmers and rural communities are an integral part of broader communities and that there is a strong reliance on the rural sector by urban communities.

It is noted that there is a range of groups that are focused on advocating for rural needs and providing wider support to that sector, e.g. Federated Farmers and Rural Womens New Zealand Network. Whilst this is an important issue for the rural sector it's considered outside the scope of the purpose of the SmartGrowth Strategy.

No further evaluation of these submissions is necessary because there are no practicable options to address these matters through the SmartGrowth Strategy.

#### **Opportunities for rural residential / lifestyle living**

LandPlay believes there needs to be further exploration of rural residential / lifestyle living options, in particular they believe it would be desirable to identify new suitable land for lifestyle living. LandPlay has stated that opportunities for rural residential / lifestyle zoning should be considered supplementary to

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intensification and greenfield opportunities. LandPlay states that appropriate structure planning would be a critical component enabling this to occur, to ensure that appropriate services could be provided.

LandPlay acknowledges that the Lifestyle Zone in the Western Bay of Plenty District Plan enables a more 'self-sufficient' approach from a servicing perspective and this should also be considered as an option for providing housing.

It is the role of the Future Development Strategy to set out the settlement pattern and areas of further growth. The LandPlay proposal is specifically considered in that IOP.

At a broad level, lifestyle zoning is not supported as it's inconsistent with policy direction, in particular the NPS HPL, RPS, and the Western Bay of Plenty District Plan. It is also inconsistent with the connected centres, compact urban development approach adopted through UFTI.

Rural residential / lifestyle development is not considered an efficient land use for many reasons, most notably the cost of servicing discrete areas for infrastructure.

No further evaluation of these submissions is necessary because the matters are dealt with in the Future Development Strategy IOP.

#### **A more enabling approach for housing on rural properties**

Some submitters raised that some of the rules for housing in the rural zone are too restrictive. In particular, a 10m setback from boundaries on smaller blocks of rural land are too restrictive.

One submitter raised with regards to District / City Plan matters that councils rely too much on a complaints process when it comes to monitoring and enforcement.

One submitter noted the importance of the rural zone to preserving rural character from the protection of expanding urban communities, however noted that the rural zone rules contributed to the difficulty of achieving necessary infrastructure to provide servicing to rural properties. The submitter requests that exemptions or modifications to the City Plan (rural zone in Matapihi) to enable necessary infrastructure to support the population while also still maintaining the rural character in the area.

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It is recommended to WBOPDC and TCC that they consider investigating whether existing rules in their respective rural zone chapters are suitable for allowing additional housing on rural zoned land by way of additional dwellings / minor dwellings where appropriate. It is noted that the current National Government have released some preliminary information about being more enabling of minor dwellings, and so in this regard it is possible that this is something councils will need to review in the near future.

In considering the themes raised in the submissions, the following issue has been identified:

1. Enabling additional housing and minor dwellings on properties in the rural zones.

### Options overview

**Issue 1:** Enabling additional, secondary and minor dwellings on properties in the rural zones

<p>1A (Recommended)</p>	<p>TCC and WBOPDC review existing rules in the rural chapters of their respective City / District Plans to determine whether additional housing opportunities are feasible in the rural zone.</p> <p>Given the acute housing shortage and the need to provide additional, secondary or minor dwellings on properties it is appropriate that each Council reviews their existing rural zone chapters to determine whether or not there are appropriate opportunities to enable additional housing. WBOPDC has heard repeatedly from its communities that they would like to be able to place a secondary / minor dwelling on their property for family members to use but find the planning rules too restrictive.</p> <p>In the Western Bay of Plenty District this may include opportunities to reduce setbacks / yards where appropriate without requiring the written approval of neighbouring properties, or allowing the use of a separate access way where appropriate.</p> <p>Suitable infrastructure (3 waters and roading) has been a key limitation in enabling additional housing in the rural zone, as well as the need to retain the existing character and amenity of large areas of land, i.e., people enjoy the rural lifestyle for its peace and tranquillity with limited noise and views from other neighbouring properties. In addition,</p>
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	reverse sensitivity matters such as spray drift (where new houses are built near productive land and existing land users and have an effect on people) have been consistent reasons why it is difficult to enable new / additional housing in the rural zone. However, as mentioned above, given the acute housing shortage we are facing in the sub-region it is appropriate that the existing rules in the City and District Plan be reviewed to determine whether there are opportunities to be more enabling of additional, secondary and minor dwellings.
1B	Note the submission and make no changes.

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<b>Option 1A: Investigate existing provisions in rural and rural residential chapters to determine if the existing provisions are appropriate for enabling housing (additional, secondary and minor dwellings) (Recommended)</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>• Opportunity to consider providing more housing in the sub-region through more enabling rules in the rural zones</li> <li>• Provide access to a greater range of housing typologies, i.e., minor dwellings for elderly parents on existing sections</li> <li>• WBOPDC is undertaking a review of its District Plan and looking at priority plan change options, and has heard from its communities that they would like more opportunities to provide additional housing on their rural zoned land for family members and workers without having to go through consenting hurdles</li> <li>• The current government issued in their pre-election campaign information on how to increase housing supply which included making it easier to provide for minor dwellings, this may be something councils are going to need to consider anyway.</li> <li>• Onsite infrastructure provision could be deemed suitable in some circumstances and this shouldn't be a determining factor in reducing the opportunity for the supply of minor / additional dwellings.</li> <li>• Roading infrastructure may be able to sustain the increase of minor / additional dwellings.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>• Infrastructure availability and suitability e.g., water supply and wastewater</li> <li>• Transportation impacts on rural roads</li> <li>• Encouraging more housing on rural land will change the rural character and amenity of the rural zone unless appropriately screened / controlled</li> <li>• Reverse sensitivity issues as described above</li> <li>• Uncertainty of whether creating more enabling rules will result in a worthwhile uptake of additional, secondary and minor dwellings</li> <li>• The existing City / District Plans do currently allow for additional, secondary and minor dwellings e.g., there is a consenting pathway where it can be demonstrated that it is appropriate. Therefore a review of the Plans may not result in any meaningful changes.</li> <li>• It is noted that secondary dwellings are a permitted activity in the Tauranga City area.</li> <li>• Staff resourcing / capacity to undertake this work with existing full workloads</li> <li>• Need to consider NPS-HPL requirements, in particular the protection of highly productive land.</li> </ul>
<b>Financial implications</b>	
Staff resourcing to consider request	
<b>Other considerations</b>	

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- There is considerably more rural land in the Western Bay of Plenty District compared to within Tauranga City, therefore any considerable material advantages to increasing housing stock may be limited in the limited land areas within Tauranga City.
- The National Policy Statement for Highly Productive Land intends to protect highly productive land so that it is protected for use in land-based primary production. The Bay of Plenty Regional Council are working to map all highly productive land, (being LUC 1, 2 or 3 land) as required by the NPS-HPL.
- It is noted that one of the submissions within the Tauranga City area notes infrastructure constraints within the Tauranga City area and that this particular concern of enabling infrastructure to rural areas is not within the scope of City and District Plan rule provisions, rather it is a funding and planning of infrastructure delivery issue.

**Option 1B: Note the submissions and make no changes**
**Advantages**

- No further pressure on staff workload / capacity to undertake scoping work to change rules in City / District Plan
- Reduces reverse sensitivity risk in the rural zone
- Infrastructure servicing issues won't need to be resolved
- Potentially protects any highly productive land that may be impacted by land fragmentation (through the placement of additional housing).

**Disadvantages**

- Will not enable additional housing in rural areas and does not acknowledge the shortage of housing in the sub-region.

**Financial implications**

None

**Other considerations**

- There is considerably more rural land in the Western Bay of Plenty District compared to within Tauranga City.
- The National Policy Statement for Highly Productive Land intends to protect highly productive land so that it is protected for use in land-based primary production. The Bay of Plenty Regional Council are working to map all highly productive land, (being LUC 1, 2 or 3 land) as required by the NPS-HPL.

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- It is noted that one of the submissions within the Tauranga City area notes infrastructure constraints within the Tauranga City area and that this particular concern of enabling infrastructure to rural areas is not within the scope of City and District Plan rule provisions, rather it is a funding and planning of infrastructure delivery issue.
- Rotorua Lakes District Council are undertaking a review of their rural housing provisions, potential collaboration opportunities may exist.

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Recommended Decision
<p><b>Issue 1</b> Enabling additional, secondary and minor dwellings on properties in the rural zones</p> <p><b>Option 1A:</b> Investigate existing provisions in the sub-region's rural and rural residential chapters to determine if the existing provisions are appropriate for enabling housing (additional, secondary and minor dwellings)</p> <p>Reason</p> <ul style="list-style-type: none"> <li>• Opportunity to consider providing more housing in the sub-region through more enabling rules in the rural zones</li> <li>• Provide access to a greater range of housing typologies, i.e., minor dwellings for elderly parents on existing sections</li> <li>• WBOPDC is undertaking a review of its District Plan and looking at priority plan change options, and has heard from its communities that they would like more opportunities to provide additional housing on their rural zoned land for family members and workers without having to go through consenting hurdles</li> <li>• The current government issued in their pre-election campaign information on how to increase housing supply which included making it easier to provide for minor dwellings, this may be something councils are going to need to consider anyway.</li> </ul>
Decision
<p>Issue 1: Enabling additional, secondary and minor dwellings on properties in the rural zones</p> <p>Option 1A: Investigate existing provisions in the sub-region's rural and rural residential chapters to determine if the existing provisions are appropriate for enabling housing (additional, secondary and minor dwellings)</p>
Reason
<ul style="list-style-type: none"> <li>• Opportunity to consider providing more housing in the sub-region through more enabling rules in the rural zones</li> <li>• Provide access to a greater range of housing typologies, i.e., minor dwellings for elderly parents on existing sections</li> <li>• WBOPDC is undertaking a review of its District Plan and looking at priority plan change options, and has heard from its communities that they would like more opportunities to provide additional housing</li> </ul>

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on their rural zoned land for family members and workers without having to go through consenting hurdles

- The current government issued in their pre-election campaign information on how to increase housing supply which included making it easier to provide for minor dwellings, this may be something councils are going to need to consider anyway.

**Date approved:**

**Approved by:**

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Sensitivity: General

# SmartGrowth Strategy 2023–2073

## ISSUES AND OPTIONS PAPER

### Urban Form and Centres

**Author: Carl Lucca**

<b>Topic</b>	Section 6: Urban Form and Centres
<b>Issues</b>	<ol style="list-style-type: none"> <li>1. Support for the proposed urban form and centres approach</li> <li>2. Open space provision</li> <li>3. Opposition to the urban form and centres approach</li> <li>4. Commercial centres</li> </ol>

#### Staff Narrative

##### Overview of feedback received

##### **Issue 1: Support for the proposed urban form and centres approach**

11 submitters have indicated general support for Section 6: Urban Form and Centres. Five of the submissions state that investment is required to support the proposed urban form and centres approach, particularly as it relates to movement.

##### **Issue 2: Open space provision**

Three submitters raise the need to consider provision of open space to support the proposed urban form and centres approach. This includes the need for a city-wide amenity in the form of a botanic garden, and a query regarding the status of a 'Te Tumu Regional Park'.

##### **Issue 3: Opposition to the urban form and centres approach**

20 submitters have stated they do not support the approach to urban form and centres, raising the following specific matters:

- There is no clear vision for the city centre
- Concerns regarding urban sprawl and associated costs
- The need to support growth with appropriate infrastructure and planning
- The need to support 'hyperlocal' communities
- The need to protect the iconic nature of Mount Maunganui North
- The need to better reflect the existing commercial centres hierarchy (considered as part of issue 4 below)
- Reconsideration of UFTI's connected centres approach
- Contradictions between growth numbers for the Western Corridor.

##### **Issue 4: Commercial centres**

Six submitters identify issues related to commercial centres, specifically in relation to the hierarchy and status of centres shown (including Wairakei, Gate Pā and Tauranga Crossing), and the need for a sub-regional commercial strategy (commercial hierarchy study).

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<b>Options Overview</b>	
<b>Issue 1: Support for the proposed urban form and centres approach</b>	
Option 1A	Note the submissions and make no changes <b>(recommended)</b>
Option 1B	n/a
<b>Issue 2: Open space provision</b>	
Option 2A	Note the submissions and make no changes <b>(recommended)</b>
Option 2B	Note the submissions, and include a new directive to provide for a Botanic Garden within the sub-region
<b>Issue 3: Opposition to the urban form and centres approach</b>	
Option 3A	Note the submissions and make no changes <b>(recommended)</b>
Option 3B	Reinvestigate an alternate urban form and centres approach for the sub-region, that responds to matters raised by submitters, including: <ul style="list-style-type: none"> <li>the need for reconsideration of UFTI's connected centres approach (including further assessment of previous options considered)</li> <li>reducing urban sprawl and associated costs</li> <li>providing growth with appropriate infrastructure and planning</li> <li>Supporting 'hyperlocal' communities</li> <li>Protect the iconic nature of Mount Maunganui North</li> </ul>
Option 3C	Make amendments to the SmartGrowth Strategy 2023 to respond to contradictions between growth numbers for the Western Corridor.
<b>Issue 4: Commercial centres</b>	
Option 4A	Note the submissions and make no changes
Option 4B	Note the submissions and include a directive to complete a Commercial Centres Hierarchy for Tauranga and the Western Bay of Plenty District (including assessing the status of Wairakei, Gate Pā and Tauranga Crossing), including collaboration and integration between SmartGrowth partners as appropriate. <b>(recommended)</b>
Option 4C	Update the status of Wairakei, Gate Pā and Tauranga Crossing commercial centres status in response to the submissions received.

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Issue 1: Support for the proposed urban form and centres approach	
Option 1A: Note the submissions and make no changes (recommended)	
<b>Advantages</b> <ul style="list-style-type: none"> <li>As outlined within the Strategy, retaining the proposed urban form and centres approach will assist to respond to anticipated growth. Increasing housing density over time in existing urban areas and new growth areas will maximise development around centres, transport hubs, and corridors. Localised placemaking through spatial planning will emphasise improved amenities, restored and enhanced environmental assets, incorporating cultural values, diverse transportation choices, and addressing housing needs.</li> <li>The Transport System Plan (TSP) includes ongoing improvements to the sub-region's transport system of roads, rail, public transport, walking, cycling, parking and travel demand management.</li> <li>It is acknowledged that investment is required to support the proposed urban form and centres approach, particularly as it relates to movement. The need for 'radical change to the delivery, funding and financing model for growth has been identified' as a key directive, to support transport and urban form related outcomes.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Nil</li> </ul>
<b>Financial implications</b>	
Nil.	
<b>Other considerations:</b> Nil	

Issue 2: Open space provision	
Option 2A: Note the submissions and make no changes (recommended)	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Recognition for the need to support existing and future community wellbeing through provision of appropriate open space is <b>well captured within the Strategy and considered adequate</b>. This includes a key growth</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Nil</li> </ul>

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<p>directive in the 'Te Taiao – our environment' section, which includes developing "an interconnected network of open spaces, reserves and ecological corridors". The Urban Form and Centres section recognises the need for planning to include green spaces and "identify key reserves, open space networks and determine if additional upgrades or space is required." Outcomes for open space and amenities are also supported through the Social Infrastructure section.</p> <ul style="list-style-type: none"> <li>• TCC's and WBOPDC's open space, parks and reserves management and planning documents support this outcome through a programme of open space enhancements, including identifying improvements to reserves, open space networks and determining if additional upgrades or space is required.</li> </ul>	
<b>Financial implications</b>	
Nil	
<p><b>Other considerations:</b> TCC and WBOPDC have a number of strategies and policies to assist in planning for future open space provision alongside community needs (including within intensification areas) such as the TCC Open Space Level of Service Policy and supporting strategies, e.g., TCC Play, Active Recreation and Sport Action and Investment Plan and TCC Reserves and Open Space Action and Investment Plan.</p> <p>The submissions included a query regarding the status of a 'Te Tumu Regional Park'. It is noted that as part of ongoing work associated with the Structure planning of Te Tumu it has been identified that a significant amount of land is potentially impacted by natural hazards or is otherwise inappropriate for delivering housing due to a range of ecological, cultural, historic or important landscape related matters. Nevertheless, these areas do provide the potential for use as open space to serve a future community, and also a chance to be included as part of a wider lower Kaituna Park, including adjacent BOPRC and Western Bay of Plenty District Council land. Opportunities will continue to be explored where the three Councils work together to plan and deliver cohesive, connected, open space/recreation areas within the Te Tumu/Lower Kaituna/Maketu area, on the land owned by WBOPDC, BOPRC and private property within Te Tumu.</p>	
<b>Option 2B:</b> Note the submissions, and include a new directive to provide for a Botanic Garden within the sub-region	

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<b>Advantages</b> <ul style="list-style-type: none"> <li>As outlined by the submitters, a city-wide botanic garden, has the potential to have a range of community and environmental benefits.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>This matter is most appropriately considered as part of either TCC's or WBoPDC's Long Term Plan process and related open spaces strategies.</li> <li>Significant financial costs, including land acquisition, infrastructure development, ongoing maintenance, and staffing.</li> <li>A botanic garden is not identified within existing strategies and the proposal does not take account of existing TCC and WBoPDC place-based strategies for open space and recreation provision.</li> <li>Opportunity costs for other uses in where land resource may be scarce.</li> </ul>
<b>Financial implications</b>	
<p>This matter is most appropriately considered as part of either TCC's or WBoPDC's Long Term Plan process and related open spaces strategies. A proposed botanic garden or similar facility would have significant financial implicates, including both initial capital investment (site and development) and ongoing operational expenditure. Operational expenditure in previous studies has indicated more than \$600,000 per year (2009 costs, not accounting for inflation).</p>	
<b>Other considerations:</b> <p>The submitter specifically notes that the Greerton Racecourse Reserve may be suitable for a botanic garden. It is noted that the recent Greerton Maarawaewae Study has confirmed that the Golf Course will remain, with further access for the community; the balance of the land is subject to a business case for the future of Tauranga Hospital, whereby the site is a possible location for future health facilities and recreation space. It is also noted that TCC manages the Sydenham Botanic Park; however, it is assumed that the botanic garden sought within the submissions is of a larger, more comprehensive scale.</p>	
<b>Issue 3: Opposition to the urban form and centres approach</b>	
<b>Option 3A: Note the submissions and make no changes (recommended)</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>As outlined within the Strategy, retaining the proposed urban form and centres approach will assist to respond to anticipated growth. Increasing housing density over time in existing urban areas and new growth areas</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Nil</li> </ul>

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<p>will maximise development around centres, transport hubs, and corridors. Localised placemaking through spatial planning will emphasise improved amenities, restored and enhanced environmental assets, incorporating cultural values, diverse transportation choices, and addressing housing needs.</p> <ul style="list-style-type: none"><li>• It is estimated that between 37,000 and 43,000 new homes will need to be built over the next 30 years within the western Bay of Plenty subregion to meet housing demand, comprising a mix of detached and attached dwellings. Tauranga City will require another 30,000 to 34,000 new houses and Western Bay of Plenty District another 7,000 to 9,000 new houses for its future population. This demand is set within a context of a highly constrained environment that is subject to natural hazards, the effects of climate change and the need to protect and enhance the natural environment. The proposed urban form and centres approach provides both an up (intensification) and out (greenfield) response required to respond to growth needs of the sub region.</li><li>• The strategic approach to growth builds on the SmartGrowth Strategy 2013 approach and 2018 Future Development Strategy, both of which included full public consultation. These were premised on provision of greenfield Urban Growth Areas and the need to encourage a more compact urban form, with this approach remaining consistent through the Urban Form and Transport Initiative (refer below) and the current draft Strategy. Notwithstanding, the current draft Strategy also responds relevant changes (e.g., central government policy, market maturity in delivering higher density, and so forth) that continue to occur over time and influence implementation of the strategic outcomes.</li><li>• It is noted Structure planning and spatial planning will continue to be developed by TCC and WBoPDC for identified growth areas; and that TCC's City Centre Action and Investment Plan provides a clear vision for the city centre.</li><li>• Matters relating to the Commercial Centres Hierarchy are responded to below.</li></ul>	
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Financial implications	
Nil	
<p><b>Other considerations:</b></p> <p>Submissions raise matters relating to the need for reconsideration of UFTI's connected centres approach, including further assessment of previous options considered. The submission questions why the connected centres approach was the preferred option. The 'SmartGrowth Strategy Scenarios' report outlines the process stepped through assess options considered (including descriptions of those options and criteria considered); the report can be found at: <a href="https://www.smartgrowthbop.org.nz/articles/smartgrowth-strategy-2023-background">https://www.smartgrowthbop.org.nz/articles/smartgrowth-strategy-2023-background</a>.</p> <p>The report states that "Programme 2 – Connected Urban Villages, performed better than the other options in the assessments undertaken. However, while the philosophy behind Connected Urban Villages (Programme 2) was sound, the programme could not be completely delivered in its original form. The constraints mapping indicated that future development potential at scale is limited to the Eastern and Western corridors—and if necessary, the Northern Corridor—but only with considerable care and potentially some loss of productive soils. Balancing these factors, UFTI concluded that the optimal programme was a combination of Connected Urban Villages (Programme 2) and Two Urban Centres (Programme 3).... 'Connected Centres' combines the principles of the two programmes to develop an optimal and integrated land use and transport programme to be delivered over the next 50 years and beyond."</p>	
<p><b>Option 3B:</b> Reinvestigate an alternate urban form and centres approach for the sub-region, that responds to matters raised by submitters, including:</p> <ul style="list-style-type: none"> <li>the need for reconsideration of UFTI's connected centres approach (including further assessment of previous options considered)</li> <li>reducing urban sprawl and associated costs</li> <li>providing growth with appropriate infrastructure and planning</li> <li>Supporting 'hyperlocal' communities</li> <li>Protect the iconic nature of Mount Maunganui North</li> </ul>	
<p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>Detailed re-investigation could provide a more comprehensive understanding of the opportunities and challenges of different areas, providing more detail and direction on outcomes infrastructure, planning and community outcomes.</li> </ul>	<p><b>Disadvantages</b></p> <ul style="list-style-type: none"> <li>The proposed urban form approach builds on significant and recently completed work, including the Urban Form and Transport Initiative and Transport Systems Plan. It is important to balance the benefits with the practical constraints of time, resources, and the overarching goals of an urban growth strategy.</li> <li>As outlined in the 'SmartGrowth Strategy Scenarios' report, a comprehensive approach to assess options has been considered (including descriptions of those options and criteria considered); the report can be found at:</li> </ul>

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	<p><a href="https://www.smartgrowthbop.org.nz/articles/smartgrowth-strategy-2023-background">https://www.smartgrowthbop.org.nz/articles/smartgrowth-strategy-2023-background</a>.</p> <ul style="list-style-type: none"><li>• The current strategy, based on best practice urban form and supported by key directives, aims to address key concerns such as reducing urban sprawl, ensuring appropriate infrastructure and planning, and supporting local communities.</li><li>• Re-investigation will be time-consuming and resource-intensive, causing delays in the formulation and implementation of the urban growth strategy. Further detailed work in relation to supporting infrastructure and planning, potential growth areas, specific localised community outcomes (hyperlocal communities) and centres-based outcomes (such as Welcome Bay) will be provided for through structure planning, spatial planning, local area and community planning. Much of this work is underway in the form of spatial planning, Action and Investment Plans and Long Term Plan preparation.</li><li>• 'Hyperlocal communities' is a concept that can be facilitated through proactive engagement with communities as local planning occurs with those communities. This is supported through the 15minute neighbourhood concept integrated into the Strategy.</li><li>• Excessive detail might lead to overemphasis on specific areas, neglecting the broader regional context and potentially hindering the adaptability of the strategy.</li><li>• Recognition of the values of Mount Maunganui North are appropriately recognised through the Mount to Arataki Spatial Plan and Tauranga City Plan processes, which include assessment of coastal character, cultural view shafts and other relevant matters. Plan Change 33 is currently subject to the outcomes of the hearings process, with recommended decisions from the Independent Hearings Panel anticipated in March 2024.</li></ul>
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<b>Financial implications</b>	
Reinvestment would require significant operational expenditure to progress, including consultant fees and engagement costs.	
<b>Other considerations:</b> refer above; in relation to values of Mount Maunganui North, this matter has been considered through the Mount to Arataki Spatial Plan and Plan Change 33 processes.	
<b>Option 3C:</b> Make amendments to the SmartGrowth Strategy 2023 to respond to contradictions between growth numbers for the Western Corridor.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Nil</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>No change to the growth numbers for the Western Corridor is considered necessary – the housing numbers in the Strategy have been informed by the Housing and Business Capacity Assessment and information from the councils. It is noted in the Strategy that the wider Western Corridor area, which includes Tauriko West and Keenan Road, is being investigated as a Specified Development Project under the Urban Development Act 2020. Changes in the extent, timing, type, and scale of urban development may follow from this.</li> </ul>
<b>Financial implications</b>	
There are no direct financial implications.	
<b>Other considerations:</b> Nil	

<b>Issue 4: Commercial centres</b>	
<b>Option 4A:</b> Note the submissions and make no changes	
<b>Advantages</b> <ul style="list-style-type: none"> <li>As outlined within the Strategy, “a key component of the connected centres approach will be establishing a commercial centres strategy throughout the sub-region to ensure that centres can thrive and meet the outcomes of UFTI in creating an integrated land use and transport network”.</li> <li>It is acknowledged in the strategy that “further work is also required in terms of developing a detailed sub-regional commercial centres strategy. This will form part of the Implementation Plan supporting this strategy”.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>It is acknowledged that there is the need for further work on a commercial strategy, in the form of a Centres Hierarchy Study that considers the hierarchy at a sub-regional scale. With no <u>specific directive</u> for a Commercial Centres Hierarchy, the current hierarchy outlined in the Strategy may be perceived to be the final position on the hierarchy.</li> </ul>

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<p>This will assist with ongoing refinement of commercial and local area planning, economic sustainability of centres, transport and community planning.</p> <ul style="list-style-type: none"> <li>• Providing for the changes to the status of status of Wairakei, Gate Pā and Tauranga Crossing without further consideration of the wider sub-regional commercial hierarchy and context may result in predetermined outcomes that are not based on a consistent approach of all centres and therefore erroneous. As such, it is considered appropriate to develop a detailed sub-regional commercial centres strategy and update the SmartGrowth Strategy in due course, when this is completed.</li> </ul>	
<b>Financial implications</b>	
Costs associated with undertaking the Centres Hierarchy study.	
<p><b>Other considerations:</b> TCC and WBoPDC will prepare a Commercial Centres Hierarchy assessment as part of proposed district and city plan changes proposed. TCC have recently approved a City Plan work programme including a Commercial and Industrial Plan Change. This will include the need to complete a Commercial Centres Hierarchy. Any work undertaken in this regard will be considered at a sub-regional level.</p> <p>It is also noted that the Strategy has reflected as much of Plan Change 33 as possible, noting that the decisions may change this. Plan Change 33 is currently subject to the outcomes of the hearings process, with recommended decisions from the Independent Hearings Panel anticipated in March 2024.</p>	
<p><b>Option 4B:</b> Note the submissions and include an action in the Implementation and Funding Plan as follows: <i>“Working with partners and key stakeholders, prepare and implement a Commercial Centres Hierarchy for the sub-region, to assist in future planning and decision making.”</i> This shall include assessing the status of Wairakei, Gate Pā and Tauranga Crossing, including collaboration and integration between SmartGrowth partners and key stakeholders, as appropriate. (recommended)</p>	
<p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>• As outlined within the Strategy, “a key component of the connected centres approach will be establishing a commercial centres strategy throughout the sub-region to ensure that centres can thrive and meet the outcomes of UFTI in creating an integrated land use and transport network”.</li> <li>• The Strategy includes a comprehensive overview of the proposed approach to centres planning, including an <u>indicative</u> hierarchy (page 104). It is acknowledged in the strategy that “further work is also required</li> </ul>	<p><b>Disadvantages</b></p> <ul style="list-style-type: none"> <li>• Following completion of the centres Hierarchy by TCC and WBoPDC, some refinements to the Strategy may be required.</li> <li>• There will be some time required to undertake the studies; however, this is required to ensure the outcomes are well informed.</li> </ul>

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<p>in terms of developing a detailed sub-regional commercial centres strategy. This will form part of the Implementation Plan supporting this strategy". This will assist with ongoing refinement of commercial and local area planning, economic sustainability of centres, transport and community planning.</p> <ul style="list-style-type: none"> <li>• Providing for the changes to the status of status of Wairakei, Gate Pā and Tauranga Crossing without further consideration of the wider sub-regional commercial hierarchy and context may result in predetermined outcomes that are not based on a consistent approach of all centres and therefore erroneous. As such, it is considered appropriate to develop a detailed sub-regional commercial centres strategy and update the SmartGrowth Strategy in due course, when this is completed.</li> <li>• It is recommended that the Centres hierarchy work be completed by TCC and WBoPDC, with collaboration between the Council's and with SmartGrowth Partners as appropriate through the processes (acknowledging that each Council will have local considerations and stakeholders to engage with through their respective processes.</li> <li>• The proposed approach will provide for appropriate engagement with partners and key stakeholders through the process, which may otherwise not occur with changes to the centres through the current process.</li> <li>• Based on the above, it is recommended that an additional Urban form and centres directive be added, as follows: <i>"Working with partners and key stakeholders, prepare and implement a Commercial Centres Hierarchy for the sub-region, to assist in future planning and decision making."</i> The method of preparing the Commercial Centres Hierarchy shall worked through with TCC and WBoPDC and in conjunction with their existing work programmes.</li> </ul>	
<b>Financial implications</b>	
Costs associated with undertaking the Centres Hierarchy study.	
<b>Other considerations:</b> TCC and WBoPDC will prepare a Commercial Centres Hierarchy assessment as part of proposed district and city plan changes proposed. TCC have recently approved a City Plan work programme including a Commercial and Industrial Plan Change. This will include the need to	

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complete a Commercial Centres Hierarchy and respond to direction provided by the national Policy Statement on urban Development and National Planning Standards. Any work undertaken in this regard will be considered at a sub-regional level.	
<b>Option 4C:</b> Update the status of Wairakei, Gate Pā and Tauranga Crossing commercial centres status in response to the submissions received.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>it is acknowledged that there is a need for further work on a commercial strategy, in the form of a Centres Hierarchy Study that considers the hierarchy at a sub-regional scale. This will assist with ongoing refinement of commercial and local area planning, economic sustainability of centres, transport and community planning.</li> <li>Updating the status of particular centres has the potential to provide key stakeholders with some further certainty as to their status.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Notwithstanding the advantages, without the prerequisite assessment, this information may still be subject to change and it is inappropriate to change any single centre without a full assessment. This includes engagement with a wide range of partners and key stakeholders.</li> <li>Without the required assessment as part of a Commercial Centres Hierarchy study (taking into account wider hierarchy and contextual analysis), there is potential that a change may not correctly reflect the future proposed hierarchy. This may lead to impacts on policy decision making and investment.</li> <li>Further work is required on a commercial strategy in the form of a Centres Hierarchy Study that considers the hierarchy at a sub-regional scale. This will assist with ongoing refinement of commercial and local area planning, economic sustainability of centres, transport and community planning.</li> <li>It is recommended that the Centres hierarchy work be completed by TCC and WBoPDC, with collaboration between the Council's and with SmartGrowth partners as appropriate through the processes (acknowledging that each Council will have local considerations and stakeholders to engage with through their respective processes).</li> <li>The proposed approach will provide for appropriate engagement with partners and key stakeholders through the process, which may not otherwise occur with changes to the centres through the current process.</li> </ul>
<b>Financial implications</b>	

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Costs associated with undertaking the Centres Hierarchy study.
<p><b>Other considerations:</b> TCC and WBoPDC will prepare a Commercial Centres Hierarchy assessment as part of proposed district and city plan changes proposed. TCC have recently approved a City Plan work programme including a Commercial and Industrial Plan Change. This will include the need to complete a Commercial Centres Hierarchy and respond to direction provided by the national Policy Statement on urban Development and National Planning Standards. Any work undertaken in this regard will be considered at a sub-regional level.</p> <p>It is also noted that the Strategy has reflected as much of Plan Change 33 as possible, noting that the decisions may change this. Plan Change 33 is currently subject to the outcomes of the hearings process, with recommended decisions from the Independent Hearings Panel anticipated in March 2024.</p>

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Recommended Decision
<b>Issue 1: Support for the proposed urban form and centres approach</b>
<b>Option 1A:</b> Note the submissions and make no changes
<b>Issue 2: Open space provision</b>
<b>Option 2A:</b> Note the submissions and make no changes
<b>Issue 3: Opposition to the urban form and centres approach</b>
<b>Option 3A:</b> Note the submissions and make no changes
<b>Issue 4: Commercial centres</b>
<b>Option 4B:</b> Note the submissions and include an action in the Implementation and Funding Plan as follows: <i>“Working with partners and key stakeholders, prepare and implement a Commercial Centres Hierarchy for the sub-region, to assist in future planning and decision making.”</i> This shall include assessing the status of Wairakei, Gate Pā and Tauranga Crossing, including collaboration and integration between SmartGrowth partners and key stakeholders, as appropriate.

Decision: Issue 1: Support for the proposed urban form and centres approach
<b>Option 1A:</b> Note the submissions and make no changes
Reason
<ul style="list-style-type: none"> <li>As outlined within the Strategy, retaining the proposed urban form and centres approach will assist to respond to anticipated growth. Increasing housing density over time in existing urban areas and new growth areas will maximise development around centres, transport hubs, and corridors. Localised placemaking through spatial planning will emphasise improved amenities, restored and enhanced environmental assets, incorporating cultural values, diverse transportation choices, and addressing housing needs.</li> <li>The Transport System Plan includes ongoing improvements to the sub-region’s transport system of roads, rail, public transport, walking, cycling, parking and travel demand management.</li> <li>It is acknowledged that investment is required to support the proposed urban form and centres approach, particularly as it relates to movement. The need for ‘radical change to the delivery, funding and financing model for growth has been identified’ as a key directive, to support transport and urban form related outcomes.</li> </ul>
Decision: Issue 2: Open space provision
<b>Option 2A:</b> Note the submissions and make no changes
Reason
<ul style="list-style-type: none"> <li>Recognition for the need to support existing and future community wellbeing through provision of appropriate open space is well captured within the Strategy and considered adequate. This includes a key growth directive in the ‘Te Taiao – our environment’ section, which includes developing “an interconnected network of open spaces, reserves and ecological corridors”. The Urban Form and Centres section recognises the need for planning to include green spaces and “identify key reserves, open space networks and</li> </ul>

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<p>determine if additional upgrades or space is required.” Outcomes for open space and amenities are also supported through the Social Infrastructure section.</p> <ul style="list-style-type: none"> <li>TCC’s and WBOPDC’s open space, parks and reserves management and planning documents support this outcome through a programme of open space enhancements, including identifying improvements to reserves, open space networks and determining if additional upgrades or space is required.</li> </ul>
<b>Decision: Issue 3: Opposition to the urban form and centres approach</b>
<b>Option 3A:</b> Note the submissions and make no changes
<b>Reason</b>
<ul style="list-style-type: none"> <li>As outlined within the Strategy, retaining the proposed urban form and centres approach will assist to respond to anticipated growth. Increasing housing density over time in existing urban areas and new growth areas will maximise development around centres, transport hubs, and corridors. Localised placemaking through spatial planning will emphasise improved amenities, restored and enhanced environmental assets, incorporating cultural values, diverse transportation choices, and addressing housing needs.</li> <li>It is estimated that between 37,000 and 43,000 new homes will need to be built over the next 30 years within the western Bay of Plenty subregion to meet housing demand, comprising a mix of detached and attached dwellings. Tauranga City will require another 30,000 to 34,000 new houses and Western Bay of Plenty District another 7,000 to 9,000 new houses for its future population. This demand is set within a context of a highly constrained environment that is subject to natural hazards, the effects of climate change and the need to protect and enhance the natural environment. The proposed urban form and centres approach provides both an up (intensification) and out (greenfield) response required to respond to growth needs of the sub region.</li> <li>The strategic approach to growth builds on the SmartGrowth Strategy 2013 approach and 2018 Future Development Strategy, both of which included full public consultation. These were premised on provision of greenfield Urban Growth Areas and the need to encourage a more compact urban form, with this approach remaining consistent through the Urban Form and Transport Initiative and the current draft Strategy. Notwithstanding, the current draft Strategy also responds relevant changes (e.g., central government policy, market maturity in delivering higher density, and so forth) that continue to occur over time and influence implementation of the strategic outcomes.</li> <li>It is noted Structure planning and spatial planning will continue to be developed by TCC and WBOPDC for identified growth areas; and that TCC’s City Centre Action and Investment Plan provides a clear vision for the city centre.</li> <li>Further detailed work in relation to supporting infrastructure and planning, potential growth areas, specific localised community outcomes (hyperlocal communities) and centres-based outcomes (such as Welcome Bay) will be provided for through structure planning, spatial planning, local area and</li> </ul>

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<p>community planning. Much of this work is underway in the form of spatial planning, Action and Investment Plans and Long Term Plan preparation.</p> <ul style="list-style-type: none"> <li>• ‘Hyperlocal communities’ is a concept that can be facilitated through proactive engagement with communities as local planning occurs with those communities. This is supported through the 15minute neighbourhood concept integrated into the Strategy.</li> <li>• Recognition of the values of Mount Maunganui North are appropriately recognised through the Mount to Arataki Spatial Plan and Tauranga City Plan processes.</li> </ul>
<p><b>Decision: Issue 4: Commercial centres</b></p>
<p><b>Option 4B:</b> Note the submissions and include an action in the Implementation and Funding Plan as follows: <i>“Working with partners and key stakeholders, prepare and implement a Commercial Centres Hierarchy for the sub-region, to assist in future planning and decision making.”</i> This shall include assessing the status of Wairakei, Gate Pā and Tauranga Crossing, including collaboration and integration between SmartGrowth partners and key stakeholders, as appropriate.</p>
<p><b>Reason</b></p> <ul style="list-style-type: none"> <li>• As outlined within the Strategy, “a key component of the connected centres approach will be establishing a commercial centres strategy throughout the sub-region to ensure that centres can thrive and meet the outcomes of UFTI in creating an integrated land use and transport network”.</li> <li>• The Strategy includes a comprehensive overview of the proposed approach to centres planning, including an <u>indicative</u> hierarchy (page 104). It is acknowledged in the strategy that “further work is also required in terms of developing a detailed sub-regional commercial centres strategy. This will form part of the Implementation Plan supporting this strategy”. This will assist with ongoing refinement of commercial and local area planning, economic sustainability of centres, transport and community planning.</li> <li>• Providing for the changes to the status of status of Wairakei, Gate Pā and Tauranga Crossing without further consideration of the wider sub-regional commercial hierarchy and context may result in predetermined outcomes that are not based on a consistent approach of all centres and therefore erroneous. As such, it is considered appropriate to develop a detailed sub-regional commercial centres strategy and update the SmartGrowth Strategy in due course, when this is completed.</li> </ul>

**Date approved:****Approved by:**

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## SmartGrowth Strategy 2023–2073

### ISSUES AND OPTIONS PAPER

**Topic Lead: Steve Hurley**

<b>Topic</b>	Three Waters and Other Infrastructure
<b>Issue</b>	1. Three Waters Reforms 2. Water Supply Analysis and Availability 3. Electricity Generation and Supply

#### Staff Narrative

##### **Overview of feedback received.**

Twelve submissions were received on the Three Waters and Other Infrastructure topic.

These submissions focussed on three main issues being; Three Waters Reforms, Water Supply Analysis and Availability, and Electricity Generation and Supply.

##### Issue 1: Three Waters Reform

Three submissions were received in opposition to the Three Waters Reforms.

The water reforms could not be fully accounted for in the current SmartGrowth Strategy as they were not finalised. Fundamentally, the reforms were about the transfer of responsibilities from Councils to other entities, not long-term planning. Long term planning investigates the physical and financial feasibility of providing the infrastructure to support forecast population increase and settlement patterns. The potential pros and cons of providing the infrastructure is a factor to consider against where expansion should occur.

There is uncertainty in this space with the coalition government signalling that the Three Waters legislation will be repealed and replaced with Local Water Done Well which returns ownership of three waters infrastructure back to the local authorities. Partnering on long term planning and decision making is vital. The SmartGrowth partnership will endeavour to continue maintaining relationships, keep abreast of the changing political environment and deliver accurate reporting to our communities and stakeholders

##### Issue 2: Water Supply Analysis and Availability

Six submissions were received seeking more clarity on the long-term water supply provision and allocations to cater for increased demand.

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The strategy focussed primarily on the challenges that the sub-region faces. Further information which provides context around how water is secured across the district follows.

The reliance on Tauranga City sourcing water from Western Bay of Plenty's area is to be expected considering TCC is largely a developed urban area and the Strategy takes a subregional approach. There are no suitable natural catchment areas within the city from which to harvest rainwater, or areas suitable for bores and stream intakes. These areas are found within the Western Bay District and the situation of a city relying on the neighbouring rural district for suitable sites is typical for NZ.

TCC and WBoPDC work closely together to ensure communities are adequately supplied with clean and reliable water supplies. The Our Water Future Programme (OWF) is a joint initiative of TCC and WBoPDC, with the overall goal of developing a holistic and integrated approach to the management of potable water, wastewater, and stormwater in the Western Bay of Plenty sub-region. It is a response to the challenges for three waters delivery, catering for ongoing growth, the need to adapt to climate change, and anticipated changes in regulation, including the requirement to give effect to Te Mana o te Wai.

The programme seeks to leverage collaboration between TCC, WBoPDC, Tāngata Whenua and other partners to better understand how water supply, wastewater, and stormwater interrelate with each other, and to create a fully integrated approach to sub-regional three waters management capable of achieving public health, environmental, urban amenity (community) and cultural outcomes. One of the key outcomes is to strategically align Three Waters infrastructure planning at a sub-regional scale in accordance with growth assumptions and ongoing spatial planning under SmartGrowth. This work is ongoing with an immediate focus on reconsenting existing water takes and wastewater consents, while advancing investigations into additional water takes, alternative water sources (rainwater harvesting etc), demand management (eg: Waterwatchers) and wastewater treatment and disposal methods

Extracting water for drinking water supply requires consent from the regulator (Bay of Plenty Regional Council), who must consider a range of legislative constraints, regulatory requirements and policies when issuing these consents, including the need to provide for other uses. Recent changes in the regulatory framework also mean that human need is no longer the only determining factor when making decisions about water use. Te Mana o te Wai highlights the importance of sustaining the integrity and health of the water before providing for human use, through a three-tiered hierarchy of obligations:

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First, to the water itself, to protect its health and its mauri.  
Second, to essential human needs, such as drinking water.  
Third, to provide for other uses.

The functionality of water supply infrastructure and its resilience to natural hazard events and operational failure are important factors for efficient water use. As some of the critical infrastructure is located in areas prone to multiple natural hazards, there is potential risk of supply disruption. Water supply is not only dependent on the physical availability of water. Infrastructure resilience, social and cultural factors need to be considered also, alongside the implementation of Te Mana o te Wai. Investigation and analysis of alternative or additional locations for water extraction needs to acknowledge and provide for all of these elements.

### Issue 3: Electricity Generation and Supply

Three submissions were received with a general focus on the current constraints in the grid and the investment needed to the generation, transmission and local distribution to support growth.

It is widely understood that that the Western Bay of Plenty sub-region is rapidly growing. The sub-regions electricity infrastructure needs to keep abreast of this rapid growth to ensure power is available when and where people and businesses need it. Transpower and Powerco are working together to plan and deliver the essential upgrades on the electricity network that are needed in the sub-region. This is a long-term programme with delivery spanning over the next 10 years. Consultation was recently completed on the first phase of work, which set out the need for upgrades, technical assumptions, and possible options for upgrades on the high voltage transmission network. Upgrades are required to support both projected population growth and electrification of the economy. Transpower's early work with Powerco indicates that the demand for electricity across the sub-region will increase by at least 60%, but potentially up to 90% by 2035. By 2050, demand could be as much as 145% above what it is today.

From last years long list, further consultation is planned in 2024 to establish a short-list of options following feedback from the first round of consultation, including further technical investigations and analysis. The intention is that this consultation will provide solution options for the public to consider. It will include work that both Transpower and Powerco would need to undertake on their transmission and distribution networks respectively.

The SmartGrowth councils (amongst others) have been active participants in the consultation with Transpower and Powerco. We look forward to

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continuation of this to assist Transpower to provide a vital, resilient, and reliable power supply to our communities.

Options overview	
<b>Issue 1: Three Waters Reform</b>	<p><u>Option 1A:</u> Retain the draft FDS text</p> <p><u>Option 1B: (Recommended)</u> Amend the draft text to reflect the changing status of water reform under the coalition government.</p> <p>Update page 122 of the strategy to remove reference to entities and replace with Local Water Done Well references with return of ownership back to local authorities.</p>
<b>Issue 2: Water Supply Analysis and Availability</b>	<p><u>Option 2A: (Recommended)</u> Provide additional text in the draft SmartGrowth Strategy and FDS that recognises the need for ongoing investigation and analysis of potential alternative water sources for growth and increased resiliency.</p> <p>Add bullet points under “Key Three Waters and other infrastructure challenges” (page 124) to reference the need for consenting of existing water takes and add references to “Our Water Future” strategy</p> <p><u>Option 2B:</u> Retain the draft SmartGrowth Strategy and FDS text</p>
<b>Issue 3: Electricity Generation and Supply</b>	<p><u>Option 3A:</u> Retain the draft SmartGrowth Strategy and FDS text and Map 15</p> <p><u>Option 3B: (Recommended)</u> Amend the draft SmartGrowth Strategy and FDS text to incorporate Powerco and Transpower distribution and transmission capacity with planned network expansion.</p> <ul style="list-style-type: none"> <li>• Update Map 15 to differentiate the National Grid from the electricity distribution network.</li> <li>• Add NPS-ET to requirements (page 47)</li> <li>• Expand point 8 (page 124) to reference the Western Bay of Plenty Development Plan and note the increase in demands</li> </ul>

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<b>Issue 1: General – Three Waters Reform</b>	
<b>Option 1A:</b> Retain the draft FDS text	
<b>Advantages</b> <ul style="list-style-type: none"> <li>The scope and direction of the Three Waters Reform is likely to continue to evolve due to changes at government level. By retaining the current draft Strategy and FDS text, the document can be updated in due course when the Three Waters Reform is more clearly defined.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Does not directly align with the direction currently being indicated by the coalition government.</li> </ul>
<b>Financial implications</b>	
None. No changes are required under this option.	
<b>Other considerations</b>	
<b>Option 1B: (Recommended)</b> Amend the draft FDS text to reflect the changing status of water reform under the coalition government.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Reflects the direction currently being indicated by the coalition government.</li> <li>Removes the contention surrounding water reforms.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Undermines the work undertaken to date in identifying entities and potential efficiencies.</li> <li>Will likely alter future LTP/Annual Plans to bring water infrastructure spending back into local Council balance sheets, which may impact budgets across other areas of expenditure.</li> <li>On-going revisions may be required as scope and direction of Three Waters Reform is confirmed.</li> </ul>
<b>Financial implications</b>	
LTP's will require ongoing modifications to bring capital expenditure back onto balance sheets which may impact the delivery timeframes of other aspects of the FDS, such as Social Infrastructure or constrain growth until such time as required upgrades are in place	
<b>Other considerations</b>	

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Issue 2: Water Supply Analysis and Availability	
i. <b>Option 2A (Recommended)</b> Provide additional text in the draft SmartGrowth Strategy and FDS that recognises the need for ongoing investigation and analysis of potential alternate water sources for growth and increased resiliency.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Provides more information around how the management of water across the Western Bay of Plenty sub-region is planned.</li> <li>Provides a reference to Our Water Future joint initiative and 30-yr strategy documents</li> <li>Water supply is identified as a critical factor in sustainable development.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>This level of detail is not required at this strategy level and is addressed in the TCC Draft 30-year Water Supply Strategy 2024-2054 which identifies urban growth and infrastructure provision as a major strategic challenge.</li> </ul>
<b>Financial implications</b>	
None identified	
<b>Other considerations</b>	
NPS-FM changes may allow for more streamlined consenting options	
<b>Option 2B: Retain the draft SmartGrowth Strategy and FDS text</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>The draft SmartGrowth strategy already highlights water supply as a key challenge and includes water supply related growth directives: <ul style="list-style-type: none"> <li>Key challenge: Increased demand on the potable water supply. It is noted that careful monitoring of existing resource consents is required to provide for this demand.</li> <li>Growth Directive: Secure and protect long-term water availability for all our communities within environmental limits set in accordance with Te Mana o te Wai.</li> <li>Growth Directive: Wastewater and water supply networks and treatment plants are managed across the sub-region to achieve efficient and effective investment to service planned urban growth.</li> </ul> </li> <li>This level of detail is not required at this strategy level and is addressed in the TCC Draft 30-year Water Supply Strategy 2024-2054 which identifies urban growth and infrastructure provision as a major strategic challenge.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Work being undertaken under TCC Draft 30-year Water Supply Strategy 2024-2054 is not specifically highlighted or referenced.</li> </ul>

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<b>Financial considerations</b>
None. If required, amendments can be made to the FDS text within the existing budget. Delay in adoption
<b>Other Considerations</b>

<b>Issue 3: Electricity Generation and Supply</b>	
<b>Option 3A:</b> Retain the draft Smartgrowth Strategy and FDS text and Map 15	
<b>Advantages</b> <ul style="list-style-type: none"> <li>The draft SmartGrowth strategy already highlights power as a key challenge and includes a power related growth directive: <ul style="list-style-type: none"> <li>Development planning is co-ordinated with electricity transmission and supply, and connectivity coverage.</li> </ul> </li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>SmartGrowth strategy and FDS does not specifically reference the NPS-ET as a relevant National Policy Statement or specifically demonstrate how the strategy has been informed by this.</li> <li>Does not include an assessment of the extent to which electricity supply is sufficient to support development.</li> <li>Does not specifically identify the National Grid within the constraints analysis (Part 3, Chapter 1) or differentiate the nationally significant National Grid transmission lines and substations from the electricity distribution network.</li> </ul>
<b>Financial implications</b>	
None identified.	
<b>Other considerations</b>	
<ul style="list-style-type: none"> <li></li> </ul>	
<b>Option 3B: (Recommended)</b> Amend the draft SmartGrowth Strategy and FDS text to incorporate Powerco and Transpower distribution and transmission capacity with planned network expansion. Update Map 15 to differentiate the National Grid from the electricity distribution network. <ol style="list-style-type: none"> <li>Update SmartGrowth Strategy to include reference to NPS-ET and demonstrate how the strategy has been informed by the policy (Part 3, Chapter 1 onwards).</li> <li>Add NPS-ET to the requirements chart (page 47, Part 3, Chapter 1) to include the National Grid.</li> </ol>	

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III. Amend Map 15 to differentiate the nationally significant National Grid transmission lines and substations from the electricity distribution network.	
<b>Advantages</b> <ul style="list-style-type: none"><li>• Strategy and FDS clearly reference and demonstrate how the strategy has been informed by NPS-ET.</li><li>• National Grid considered as part of constraints analysis.</li><li>• Maps clearly differentiate the national grid asset from the local distribution network.</li></ul>	<b>Disadvantages</b> <ul style="list-style-type: none"><li>• Map becomes cluttered and difficult to interpret.</li><li>• Potentially significant input required with Transpower to undertake constraints analysis.</li></ul>
<b>Financial implications</b>	
N/A	
<b>Other considerations</b>	

<b>Recommended Decisions</b>	
<b>Issue 1: Three Waters Reform</b>	
<b>Option 1B:</b> Amend the draft FDS text to reflect the changing status of water reform under the coalition government.	
Update page 122 of the strategy to remove reference to entities and replace with Local Water Done Well references with return of ownership back to local authorities.	
<b>Issue 2: Water Supply Analysis and Availability</b>	
<b>Option 2A</b> Provide additional text in the draft SmartGrowth Strategy and FDS that recognises the need for ongoing investigation and analysis of potential alternative water sources for growth and increased resiliency.	
Add bullet points under “Key Three Waters and other infrastructure challenges” (page 124) to reference the need for reconsenting of existing water takes and add references to “Our Water Future” strategy	
<b>Issue 3: Electricity Generation and Supply</b>	
<b>Option 3B:</b> Amend the draft SmartGrowth Strategy and FDS text to incorporate Powerco and Transpower distribution and transmission capacity with planned network expansion. Update Map 15 to differentiate the National Grid from the electricity distribution network.	
I. Update Map 15 to differentiate the National Grid from the electricity distribution network.	
II. Add NPS-ET to requirements (page 47)	
III. Expand point 8 (page 124) to reference the Transpower’s Western Bay of Plenty Development Plan and note the increase in demands anticipated	

<b>Decision – Issue 1: Three Waters Reform</b>	
<b>Option 1B:</b> Amend the draft FDS text to reflect the changing status of water reform under the coalition government.	
This includes updating page 122 of the strategy to remove reference to entities and replace with Local Water Done Well references with return of ownership back to local authorities.	
<b>Reason</b>	
<ul style="list-style-type: none"> <li>Reflects the direction currently being indicated by the coalition government.</li> <li>Removes the contention surrounding water reforms.</li> </ul>	
<b>Decision – 2: Water Supply Analysis and Availability</b>	
<b>Option 2A</b> Provide additional text in the draft SmartGrowth Strategy and FDS that recognises the need for ongoing investigation and analysis of potential alternative water sources for growth and increased resiliency.	

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This adds bullet points under “Key Three Waters and other infrastructure challenges” (page 124) to reference the need for reconsenting of existing water takes and add references to “Our Water Future” strategy
<b>Reason</b>
<ul style="list-style-type: none"><li>• Provides more information around how the management of water across the Western Bay of Plenty sub-region is planned.</li><li>• Provides a reference to Our Water Future joint initiative and 30-yr strategy documents</li><li>• Water supply is identified as a critical factor in sustainable development.</li></ul>
<b>Decision –Issue 3: Electricity Generation and Supply</b>
<b>Option 3B:</b> Amend the draft SmartGrowth Strategy and FDS text to incorporate Powerco and Transpower distribution and transmission capacity with planned network expansion. This includes: <ul style="list-style-type: none"><li>i. Updating Map 15 to differentiate the National Grid from the electricity distribution network.</li><li>ii. Adding NPS-ET to requirements (page 47)</li><li>iii. Expanding point 8 (page 124) to reference the Transpower’s Western Bay of Plenty Development Plan and note the increase in demands anticipated</li></ul>
<b>Reason</b>
<ul style="list-style-type: none"><li>• Strategy and FDS clearly reference and demonstrate how the strategy has been informed by NPS-ET.</li><li>• Maps clearly differentiate the national grid asset from the local distribution network.</li></ul>

**Date approved:**

**Approved by:**

A5768224



Sensitivity: General

# SmartGrowth Strategy 2023–2073

## ISSUES AND OPTIONS PAPER

### Economic Wellbeing

**Author: Greg Simmonds**

<b>Topic</b>	SGS23-11: Economic wellbeing
<b>Issues</b>	<ol style="list-style-type: none"> <li>1. Oppose</li> <li>2. Environmental sustainability</li> <li>3. Existing industrial activity</li> <li>4. Region's role in upper North Island</li> <li>5. Data source for employment figures</li> </ol>

#### Staff Narrative

##### Overview of feedback received

3 submitters generally support the Strategy, with 2 noting particular support for the recognition given to how interconnected the WBOP subregion is with the upper North Island and the importance of taking an integrated approach to planning.

4 submitters have provided general comments noting the importance of the Port of Tauranga; the need for affordable housing to retain talent; the interest and role of Māori land trusts in contributing to economic development; and the role Te Puke could play in supporting housing and industrial development.

7 submitters oppose the strategy.

##### **Issue 1: Oppose the Strategy.**

4 submitters generally oppose the Strategy.

##### **Issue 2: Incorporate greater emphasis on environmental sustainability.**

1 submitter (Julian Richmond Fitter) proposes the Strategy places greater emphasis on the protection and enhancement of the environment when considering economic development opportunities.

##### **Issue 3: Recognise and support existing industrial activity.**

1 submitter (Golden Bay, a Division of Fletcher Concrete & Infrastructure Ltd) has proposed adding a new economic objective that recognises and supports existing industrial activities contributing to the regional and national economy.

##### **Issue 4: Region's role in the upper North Island.**

1 submitter (Beth Willard Bowden) notes Tauranga's place in the 'golden triangle' is not adequately acknowledged.

##### **Issue 5: Data source for employment figures.**

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1 submitter (Beth Willard Bowden) requests the source for employment numbers on page 136 be added.

Options overview	
<b>Issue 1:</b> Oppose the Strategy.	
Option 1	Note the submissions and make no changes. <b>Recommended option.</b>
<b>Issue 2:</b> Changes to Strategy to incorporate greater emphasis on environmental sustainability.	
Option 2A	Continue with Strategy as drafted but noting clear actions to deliver a more sustainable regional economy that enhances and protects the environment and mitigates the impact of climate change will be picked up in the Strategy Implementation Plan under Economic Development Directive number 5: <i>Transition to a low carbon, circular economy</i> , and Economic Development Directive number 6: <i>Economic Development supports environmental protection and enhancement</i> . <b>Recommended option.</b>
Option 2B	Strengthen wording within the Strategy to emphasise how future economic development will minimise environmental impact.
<b>Issue 3:</b> Add a new economic objective that recognises and supports existing industrial activities contributing to the regional and national economy.	
Option 3A	Continue with the Strategy as drafted but noting actions to recognise and support existing industrial activities that provide for economic and housing growth and contribute to the regional and national economy will be picked up in the Strategy Implementation Plan under Economic Development Directive number 1: <i>Lift earnings by focusing on high-value and knowledge-intensive job creation and enabling employment pathways for local people</i> . <b>Recommended option.</b>
Option 3B	Change Economic Development Directive number 2: <i>Shift our industry sector mix to be more knowledge-intensive by increasing technology capability, research and development</i> to incorporate support for existing industrial activities contributing to the local and national economy e.g. Economic Development Directive number 2 is rewritten as: <i>Enable and support existing industrial activities contributing to regional and national prosperity whilst focusing on shifting our industry sector mix to be more knowledge-intensive by increasing technology capability, research and development</i> .
<b>Issue 4:</b> Changes to Strategy to strengthen the importance of the role the sub-region has in the upper North Island economy.	

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Option 4A	Continue with the Strategy as drafted but noting that actions to ensure that the sub-region's economy and interests are adequately acknowledged and represented in the context of the upper North Island will be picked up in the Strategy Implementation Plan under Economic Development Directive number 6: <i>Economic development – is integrated within sub-regional spatial planning; supports the Urban Form and Transport Initiative (UFTI) connected centres approach; supports environmental protection and enhancement; and takes account of wider regional and Upper North Island economic plans.</i>
Option 4B	Change Economic Development Directive number 6: <i>Economic development – is integrated within sub-regional spatial planning; supports the Urban Form and Transport Initiative (UFTI) connected centres approach; supports environmental protection and enhancement; and takes account of wider regional and Upper North Island economic plans</i> to strengthen the sub-region's importance within the upper North Island's economy. <b>Recommended option.</b>
<b>Issue 5:</b> Add a source for the employment data in the chart on page 136	
Option 5A	Note the submission and make no change.
Option 5B	Add the data source for employment figures on page 136. The data source is: SmartGrowth Housing and Business Capability Assessment, 2022. <b>Recommended option.</b>

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<b>Issue 1: Oppose the strategy.</b>	
<b>Option 1A:</b> Note the submissions and make no changes. <i>Recommended option.</i>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>N/A</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>N/A</li> </ul>
<b>Financial implications</b>	
N/A	
<b>Other considerations</b>	
The 4 submissions generally opposed to the Strategy either propose no changes or provide no commentary for the Strategy to address. Therefore, noting the submissions and making no changes to the Strategy is the only viable option.	
<b>Issue 2: Changes to the Strategy to incorporate greater emphasis on environmental sustainability.</b>	
<b>Option 2A:</b> Continue with Strategy as drafted but noting clear actions to deliver a more sustainable regional economy that enhances and protects the environment and mitigates the impact of climate change will be picked up in the Strategy Implementation Plan under Economic Development Directive number 5: <i>Transition to a low carbon, circular economy</i> , <u>and</u> Economic Development Directive number 6: <i>Economic Development – supports environmental protection and enhancement</i> . <i>Recommended option.</i>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>The Strategy already contains strong statements regarding the importance of environmental sustainability to maintaining a competitive regional economy. Two of the six Economic Development Directives (Directives 5 &amp; 6) specifically reference significant environmental sustainability goals.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>The specifics as to how the economic development strategy will enhance environmental sustainability are not articulated in detail.</li> </ul>

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<b>Financial implications</b>	
N/A	
<b>Other considerations</b>	
N/A	
<b>Option 2B:</b> Strengthen wording within the Strategy to emphasise how future economic development will minimise environmental impact.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Provides greater confidence that there are actions to back up the strategy.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Takes the Strategy into the realm of implementation and would be inconsistent with other economic development directives.</li> </ul>
<b>Financial implications</b>	
N/A	
<b>Other considerations</b>	
N/A	
<b>Issue 3: Add a new economic objective that recognises and supports existing industrial activities contributing to the regional and national economy.</b>	
<b>Option 3A:</b> Continue with the Strategy as drafted but noting actions to recognise and support existing industrial activities that provide for economic and housing growth and contribute to the regional and national economy will be picked up in the Strategy Implementation Plan under Economic Development Directive number 1: <i>Lift earnings by focusing on high-value and knowledge-intensive job creation and enabling employment pathways for local people. <b>Recommended option.</b></i>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Keeps the Strategy focussed on addressing key economic challenges, opportunities and the need for change in key areas such as environmental sustainability, rather than on a business-as-usual approach.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Existing businesses, particularly those that contribute to regional and national prosperity through provision of housing or key infrastructure, may not see themselves as supported by the Strategy.</li> </ul>
<b>Financial implications</b>	
N/A	

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Other considerations	
There will be conflicts that exist between supporting existing industrial activity, jobs etc... and the social licence of certain industries to continue to operate, particularly with respect to environmental impacts.	
<b>Option 3B:</b> Change Economic Development Directive number 2: <i>Shift our industry sector mix to be more knowledge-intensive by increasing technology capability, research and development</i> to incorporate support for existing industrial activities contributing to the local and national economy e.g. Economic Development Directive number 2 is rewritten as: <i>Enable and support existing industrial activities contributing to regional and national prosperity whilst focusing on shifting our industry sector mix to be more knowledge-intensive by increasing technology capability, research and development.</i>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Existing businesses are more likely to see themselves as being supported by the Strategy.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>May dilute the Strategy's overall vision and impact by giving the impression that a business-as-usual approach will be fully supported and endorsed.</li> </ul>
Financial implications	
N/A	
Other considerations	
N/A	
Issue 4: Changes to Strategy to strengthen the importance of the role the sub-region has in the upper North Island economy.	
<b>Option 4A:</b> Continue with the Strategy as drafted but noting that actions to ensure that the sub-region's economy and interests are adequately acknowledged and represented in the context of the upper North Island will be picked up in the Strategy Implementation Plan under Economic Development Directive number 6: <i>Economic development – is integrated within sub-regional spatial planning; supports the Urban Form and Transport Initiative (UFTI) connected centres approach; supports environmental protection and enhancement; and takes account of wider regional and Upper North Island economic plans.</i>	

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<b>Advantages</b> <ul style="list-style-type: none"> <li>There are several submissions in support of the current wording referencing the upper North Island.</li> <li>There are references and maps in the Chapter context which signal the increasing importance of the upper North Island's economy and the sub-region's place in it; including reference to the Port of Tauranga as a critical piece of national infrastructure.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>The wording as currently drafted may not adequately acknowledge the sub-region's economic importance within the upper North Island or the potential to collaborate more closely with neighbouring regions.</li> </ul>
<b>Financial implications</b>	
N/A	
<b>Other considerations</b>	
N/A	
<b>Option 4B:</b> Add additional wording to Economic Development Directive number 6 as follows: <i>Economic development – is integrated within sub-regional spatial planning; supports the Urban Form and Transport Initiative (UFTI) connected centres approach; supports environmental protection and enhancement; collaborates and takes account of wider regional and Upper North Island economic plans to strengthen how the sub-region interacts with neighbouring regions and its importance within the upper North Island's economy. <b>Recommended option.</b></i>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Acknowledges the importance of working closely with neighbouring regions, particularly within the upper North Island, as economic geography is not constrained by Council boundaries.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>The sub-region has little control over how other region's undertake their own planning; we can only control how we interact with neighbouring regions and take their plans into consideration when developing our own plans.</li> </ul>
<b>Financial implications</b>	
N/A	
<b>Other considerations</b>	
N/A	

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<b>Issue 5: Add a source for the employment data in the chart on page 136.</b>	
<b>Option 5A:</b> Note the submission and make no change.	
<b>Advantages</b> <ul style="list-style-type: none"><li>• None.</li></ul>	<b>Disadvantages</b> <ul style="list-style-type: none"><li>• No source for the employment data in the chart on page 136 is provided.</li></ul>
<b>Financial implications</b>	
N/A	
<b>Other considerations</b>	
N/A	
<b>Option 5B:</b> Add the data source for employment figures on page 136. The data source is: SmartGrowth Housing and Business Capability Assessment, 2022. <b>Recommended option.</b>	
<b>Advantages</b> <ul style="list-style-type: none"><li>• Source for the employment data on page 136 is provided.</li></ul>	<b>Disadvantages</b> <ul style="list-style-type: none"><li>• None</li></ul>
<b>Financial implications</b>	
N/A	
<b>Other considerations</b>	
N/A	

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Recommended Decisions
<p><b>Issue 1:</b> Oppose the Strategy.</p> <p><b>Option 1A:</b> Note the submissions and make no changes.</p>
<p><b>Issue 2:</b> Changes to the Strategy to incorporate greater emphasis on environmental sustainability.</p> <p><b>Option 2A:</b> Continue with Strategy as drafted but noting clear actions to deliver a more sustainable regional economy that enhances and protects the environment and mitigates the impact of climate change will be picked up in the Strategy Implementation Plan under Economic Development Directive number 5: <i>Transition to a low carbon, circular economy, and</i> Economic Development Directive number 6: <i>Economic Development – supports environmental protection and enhancement.</i></p> <p><i>The Strategy already contains strong statements regarding the importance of environmental sustainability to maintaining a competitive regional economy. Two of the six Economic Development Directives (Directives 5 &amp; 6) specifically reference significant environmental sustainability goals.</i></p>
<p><b>Issue 3:</b> Add a new economic objective that recognises and supports existing industrial activities contributing to the regional and national economy.</p> <p><b>Option 3A:</b> Continue with the Strategy as drafted but noting actions to recognise and support existing industrial activities that provide for economic and housing growth and contribute to the regional and national economy will be picked up in the Strategy Implementation Plan under Economic Development Directive number 1: <i>Lift earnings by focusing on high-value and knowledge-intensive job creation and enabling employment pathways for local people.</i></p> <p><b>Reasons for recommendation</b></p> <p><i>Keeps the Strategy focussed on addressing key economic challenges, opportunities and the need for change in key areas such as environmental sustainability, rather than on a business-as-usual approach.</i></p>
<p><b>Issue 4:</b> Changes to Strategy to strengthen the importance of the role the sub-region has in the upper North Island economy.</p> <p><b>Option 4B:</b> Add additional wording to Economic Development Directive number 6 as follows: <i>Economic development – is integrated within sub-regional spatial planning; supports the Urban Form and Transport</i></p>

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**Initiative (UFTI) connected centres approach; supports environmental protection and enhancement; collaborates and takes account of wider regional and upper North Island economic plans.**

***Reasons for recommendation***

**Acknowledges the importance of working closely with neighbouring regions, particularly within the upper North Island, as economic geography is not constrained by Council boundaries.**

**Issue 5:** Add a source for the employment data in the chart on page 136.

**Option 5B:** Add the data source for employment figures on page 136.

***Reasons for recommendation***

**Clarity**

**Decision**

*(To be completed in the decision-making meeting)*

**Reason**

*(To be completed in the decision-making meeting)*

**Date approved:**

**Approved by:**

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Sensitivity: General

# SmartGrowth Strategy 2023–2073

## ISSUES AND OPTIONS PAPER

### Social Infrastructure

#### Topic Leads: Sonya McCall/Rebecca Gallagher

<b>Topic</b>	Chapter 10 – Social Infrastructure and Wellbeing
<b>Issues</b>	<ol style="list-style-type: none"> <li>1. Planning for people</li> <li>2. Quality of urban spaces in delivery of Connected Centres</li> <li>3. Location and use of community centres, halls and marae</li> <li>4. Coordination of provision of community healthcare and education</li> </ol>

<p><b>Staff Narrative</b></p> <p><u>Overview of feedback received:</u></p> <p>12 submitters raised 16 submission points on <i>Chapter 10 – Social Infrastructure and Wellbeing</i>. Two submitters raised additional issues relating to Social Infrastructure and Wellbeing at the hearings on 4 and 5 December 2023, being SocialLink and Tauranga National Council of Women.</p> <p>These submission points can be categorised into the following themes:</p> <ol style="list-style-type: none"> <li>1. Planning for people</li> <li>2. Quality of urban spaces in delivery of Connected Centres</li> <li>3. Location and use of community centres, halls and marae</li> <li>4. Coordination of provision of community healthcare and education</li> </ol> <p><b>Planning for people</b></p> <p>Concern has been raised around a lack of planning for people, and there appears to be some uncertainty from submitters around what facilities fall within “social infrastructure”.</p> <p>Social Infrastructure is described and defined in various ways and locations throughout the Strategy. There is no clear description in <i>Chapter 10 – Social Infrastructure and Wellbeing</i> of what social infrastructure is. We have recommended in the options table under Issue 1 the inclusion of a description of social infrastructure in this chapter.</p> <p>On page 17, the Strategy defines objectives to address the four well-beings. For social wellbeing, the following two objectives are noted:</p> <ul style="list-style-type: none"> <li>- Enable and shape an inclusive, safe, sustainable, efficient and more vibrant urban form.</li> <li>- Enable and support sufficient housing supply in existing and new urban areas to meet current and future needs, this includes a range of housing types, tenures and price points.</li> </ul>
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Neither of these relate to the provision of social infrastructure. We have recommended in the options table under Issue 2 an additional objective relating to social infrastructure.

Submissions raised that diversity and equity of provision is not adequately recognised within the Strategy. Specifically, submitters have requested further recognition and planning for older people and an aging population, people living in poverty, disabled people and migrants, immigrants and RSE workers. We have recommended minor wording changes to the text of the key challenges and growth directives of *Chapter 10 – Social Infrastructure and Wellbeing* to respond to these concerns. The proposed text changes are outlined in the options table under Issue 2.

#### **Quality of urban spaces in delivery of Connected Centres**

Submitters have raised concerns around a lack of direction regarding the design quality and suitability of urban spaces delivered as part of the connected centres approach.

The concern is that these spaces lack suitability for the communities that will be using these public spaces. Tauranga City Council and Western Bay of Plenty District Council include consideration of urban design as part of spatial planning, structure planning, public realm, and open space projects, with both Council's having urban design professionals. Tauranga City Council has also recently established an Urban Design Panel for both public and private projects. To respond to the submissions, we recommend including a reference to *Chapter 6 – Urban Design and Centres* within *Chapter 10 – Social Infrastructure and Wellbeing*.

#### **Location and use of community centres, halls and marae**

A submission has been made specifically requesting community halls in specific locations. Each Council will undertake assessments based on their own needs and the SmartGrowth growth directives. Some of this planning has already been undertaken, for example through the Tauranga City Council Community Centre Action & Investment Plan.

A submitter has noted that many marae are located away from existing hubs / connected centres, and that marae may need to be relocated to avoid flood risk – consider the provision of land for the relocation marae in the new development areas. In response to this submission consideration of the location of all social infrastructure provision, including marae, we have recommended including a reference to *Chapter 3 – Climate Resilience and integrate Climate Resilience* as a principle for *Chapter 10 – Social Infrastructure and Wellbeing*.

#### **Coordination of provision of community healthcare and education**

The submission points seek to ensure hyperlocal community development and the provision of health services and education happens alongside growth. Te Whatu Ora has a role in provision of health care. As noted on Page 129 (*Chapter 10 – Social Infrastructure and Wellbeing*) of the Strategy, there are proposals to investigate healthcare facilities for new growth areas to ensure that people are able to meet their

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needs close to where they live and to provide better services for the existing population.

SmartGrowth is committed to continuing to work with Ministry of Education and other central government agency partners to ensure a co-ordinated approach that is timely and ensures appropriate delivery of education facilities to support growth. It is also noted that Ministry of Education will continue to be engaged with directly through SmartGrowth’s Priority Development Areas workstream.

In considering the themes raised in the submissions, we have identified the following two issues:

1. Consistency and clarity on definition of terms used when talking about social infrastructure.
2. Ensuring integration of social infrastructure within the strategy objectives and alignment between *Chapter 10 – Social Infrastructure and Wellbeing* and other chapters in the SmartGrowth strategy.

**Issue 1 – Consistency and clarity on definition of terms used when talking about social infrastructure.**

As mentioned above, from the submissions received there appears to be uncertainty or a lack of clarity on what is included within the term Social Infrastructure. To resolve this perceived lack of clarity we suggest including a description of social infrastructure within the introduction section to *Chapter 10 – Social Infrastructure and Wellbeing*. This proposed description is set out in the options table below.

**Issue 2 – Ensuring integration of social infrastructure within the strategy objectives and alignment between Chapter 10 and other chapters in the SmartGrowth strategy**

As mentioned above, from the submissions received there was a perceived concern that planning matters relating to the provision of social infrastructure have not been considered or adequately provided for in the strategy. It is our view, to address this concern that we should include references to the other relevant SmartGrowth Strategy chapters (namely, *Chapter 2 – Tāngata Whenua*, *Chapter 3 – Climate Resilience* *Chapter 4 – Te Taiao – Our Environment* and *Chapter 6 – Urban Form and Centres*) within *Chapter 10 – Social Infrastructure and Wellbeing*. We have also recommended minor wording changes to the text of the key challenges and growth directives of *Chapter 10 – Social Infrastructure and Wellbeing*. We have also recommended adding an additional social wellbeing objective to the strategy objectives on page 17. We have provided recommended text additions in the options table below.

Options overview	
Issue 1: Consistency and clarity on definition of terms used when talking about social infrastructure.	
1A	For clarity, add a description of social infrastructure within the introduction section to <i>Chapter 10 – Social Infrastructure and Wellbeing</i> .

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	<u>"Social infrastructure includes those community facilities, services and networks that support individuals, families, groups and communities, such as public open space, parks and reserves, libraries, pools, community centres, indoor sports centres and halls, educational institutions, healthcare facilities and marae."</u>
1B	Note the submissions and make no changes.
<b>Issue 2:</b> Ensuring integration of social infrastructure within the strategy objectives and alignment between Chapter 10 and other chapters in the SmartGrowth strategy.	
2A	<p>Include a reference in <i>Chapter 10 – Social Infrastructure and Wellbeing</i> to link to <i>Chapter 4 – Te Taiao – Our Environment</i> which recognises open space, green space (parks and reserves, regional and sub-regional parks, walkways &amp; cycleways, access to the environment)</p> <p>An objective relating to social infrastructure and wellbeing would link the social infrastructure growth directives more clearly with the Strategy as a whole. It is recommended to add an additional objective to Page 17 for social wellbeing:</p> <ul style="list-style-type: none"> <li>- <u>Enable and support social infrastructure that is accessible and meets the needs of our community – where they can connect, socialise, learn and participate in a wide range of social, cultural, art, sporting and recreational activities, as well as broader support for community wellbeing.</u></li> </ul> <p>Amend the Social infrastructure and well-being key challenges as follows:</p> <ul style="list-style-type: none"> <li>- 3. <i>Demographics and needs are continuing to change, increasing the need for further amenities to support higher living densities as well as those in need. We have an ageing population, but we also have an increasing number of young people, particularly in the Māori population. <u>Community members have a range of socio-economic experience, including people living in poverty.</u> Our public places need to adapt to our changing needs.</i></li> </ul> <p>Add to the Social infrastructure and well-being growth directives as follows:</p> <ul style="list-style-type: none"> <li>- <del>1. Community facilities are Social infrastructure:</del> <ul style="list-style-type: none"> <li>o <u>Is universally easy to use (through all life stages, including for young, aging and disabled people with disabilities).</u></li> <li>o <del>Meets</del> the social, demographic and cultural needs of the community it serves.</li> <li>o <u>Is multi-use and flexible to changing community needs.</u></li> <li>o <u>Is safe and enjoyable spaces.</u></li> <li>o <u>Is provided on an equitable basis</u></li> </ul> </li> </ul> <p>To ensure there is a clear connection between the growth directives and explanations in the strategy when referring to "equitable basis", we</p>

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	<p>recommend including under the 'network approach' section on page 129 the following additions highlighted in bold:</p> <p><b><u>Providing social infrastructure on a network approach should also be provided on an equitable basis. This means considering each level ('sub-regional/citywide' or 'local')</u></b> having different requirements to reflect the size of the area both in terms of population and physical boundaries, the expectations of the community, and the makeup of the community. Understanding where deficits are in the network and the likely flow on effects from diminished or improved provision provides opportunity to enhance supply relative to demand and need. <b><u>Each community has a different starting point in terms of what is currently provided and their priorities, demographics and deprivation profile. While the strategy sets the intent of what we want to achieve, how we achieve it on the ground might be different from community to community.</u></b></p> <p>Reference <i>Chapter 6 – Urban Form and Centres</i>.</p> <p>Provide a reference in <i>Chapter 10 – Social Infrastructure and Wellbeing</i> to <i>Chapter 3 – Climate resilience</i>, recognising that social infrastructure provision will need to respond to challenges posed by climate change.</p> <p>Add a sentence to the end of the first paragraph on page 128 (<i>Social Infrastructure &amp; Wellbeing – Introduction</i>). "Social infrastructure also plays a role in supporting the response to natural hazards and emergency management.</p> <p>Add to the Climate resilience principles for <i>Chapter 10 – Social Infrastructure and Wellbeing</i> "integrate climate resilience".</p>
2B	Note the submissions and make no changes.

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<b>Issue 1:</b> Consistency and clarity on definition of terms used when talking about social infrastructure.	
<b>Option 1:</b> For clarity, add a description of social infrastructure within the introduction section to <i>Chapter 10 – Social Infrastructure and Wellbeing</i> :  <u><i>“Social infrastructure includes those community facilities, services and networks that support individuals, families, groups and communities, such as public open space, parks and reserves, libraries, pools, community centres, indoor sports centres and halls, educational institutions, healthcare facilities and marae.”</i></u>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Provides consistency and clarity on what is meant by the term “Social Infrastructure”.</li> <li>The proposed definition aligns the various definitions and descriptions of social infrastructure throughout the strategy: <ul style="list-style-type: none"> <li>“Social and Community Infrastructure” is defined on p176 of the Strategy as “Community infrastructure is defined in s197 of the LGA 2002 meaning land, or development assets on land, owned or controlled by the territorial authority for the purpose of providing public amenities. Social infrastructure extends to services provided by Central Government such as schools and healthcare.”</li> <li>In the “key urban form and centres challenges” section (p103), social infrastructure is partially defined within the text as “social infrastructure levels of service (e.g., parks, pools, libraries, halls, theatres and sports field) continues to increase as intensification and greenfield development occurs”.</li> <li>Chapter 4 – Te Taiao – Our Environment also lists some social infrastructure as follows: <ul style="list-style-type: none"> <li>Challenge 2 – “population growth and intensification increases demand for recreation facilities, open spaces, green space and parks”.</li> </ul> </li> </ul> </li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>The proposed definition is broader than is currently contained in Tauranga City and Western Bay of Plenty District Council’s infrastructure strategies. Each councils Infrastructure Strategy uses a slightly narrower definition, in part due to the purpose of those strategies and differences in the networks.</li> </ul> <p>The existing definitions are:</p> <p><b>SmartGrowth Strategy – Draft for Consultation - 2023 - 2073</b>  <i>Social and Community Infrastructure - Community infrastructure is defined in s197 of the LGA 2002 meaning land, or development assets on land, owned or controlled by the territorial authority for the purpose of providing public amenities. Social infrastructure extends to services provided by Central Government such as schools and healthcare<sup>[1]</sup>.</i></p> <p><b>Tauranga City Council - 2024 Draft Infrastructure Strategy</b>  <i>Social and civic infrastructure includes parks and reserves, libraries, pools, community centres, indoor sports centres, and halls. They are places for us to connect, to learn, to play and stay healthy. They contribute to the development of successful, accessible centres. They provide safe and inclusive spaces that allow cultural expression and provide opportunities for people of all ages and backgrounds to be inspired and to thrive. They are integral to our future planning, and our ability to achieve good place<sup>[1]</sup>based outcomes for all of our communities across the city<sup>[2]</sup>.</i></p> <p><b>Tauranga City Council – Our Public Places Strategic Plan 2023</b></p>

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<ul style="list-style-type: none"> <li>▪ Our environment growth directives – 1. An interconnected network of open spaces, reserves and ecological corridors is developed.</li> <li>○ Chapter 10: Social Infrastructure “– where they can connect, socialise, learn and participate in a wide range of social, cultural, art, sporting and recreational activities, as well as broader support for community wellbeing”. The body of the chapter specifically addresses healthcare, education, rural communities (community halls, marae, schools and open spaces), and uses a case study of sub-regional parks and Te Manawataki or Te Papa.</li> </ul>	<p><i>Social infrastructure - Public spaces, facilities and institutions that support social interaction and wellbeing within a community<sup>[3]</sup>.</i></p> <p><b>Western Bay of Plenty District Council - Infrastructure Strategy 2021</b></p> <p><i>Social infrastructure (community facilities, services and networks that help individuals, families, groups and communities)<sup>[4]</sup>.</i></p> <p><sup>[1]</sup> <a href="#">SmartGrowth Strategy 2023-2073 Draft for consultation (tauranga.govt.nz)</a> – Page 176</p> <p><sup>[2]</sup> <a href="#">draft-infrastructure-strategy.pdf (tauranga.govt.nz)</a> – Page 113</p> <p><sup>[3]</sup> <a href="#">our-public-places-strategic-plan.pdf (tauranga.govt.nz)</a> – Page 24</p> <p><sup>[4]</sup> <a href="#">Infrastructure Strategy.pdf (westernbay.govt.nz)</a> - Page 14</p>
<b>Financial implications</b>	
<b>N/A</b>	
<b>Other considerations</b>	
<b>N/A</b>	
<b>Option 2: Note the submissions and make no changes.</b>	
<p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>• There are already descriptions already contained within the strategy and it may be considered unnecessary.</li> </ul>	<p><b>Disadvantages</b></p> <ul style="list-style-type: none"> <li>• Leaves the chapter to be slightly ambiguous as to what is meant by Social Infrastructure.</li> <li>• Does not respond to the issues raised by submitters.</li> </ul>
<b>Financial implications</b>	
<b>N/A</b>	
<b>Other considerations</b>	
<b>N/A</b>	
<b>Issue 2:</b> Ensuring integration of social infrastructure within the strategy objectives and alignment between Chapter 10 and other chapters in the SmartGrowth strategy.	

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**Option 1:** Include a reference in *Chapter 10 – Social Infrastructure and Wellbeing* to link to *Chapter 4 – Te Taiao – Our Environment* which recognises open space, green space (parks and reserves, regional and sub-regional parks, walkways & cycleways, access to the environment)

An objective relating to social infrastructure and wellbeing would link the social infrastructure growth directives more clearly with the Strategy as a whole. It is recommended to add an additional objective to Page 17 for social wellbeing:

- Enable and support social infrastructure that is accessible and meets the needs of our community – where they can connect, socialise, learn and participate in a wide range of social, cultural, art, sporting and recreational activities, as well as broader support for community wellbeing.

Amend the Social infrastructure and well-being key challenges as follows:

- 3. *Demographics and needs are continuing to change, increasing the need for further amenities to support higher living densities as well as those in need. We have an ageing population, but we also have an increasing number of young people, particularly in the Māori population. Community members have a range of socio-economic experience, including people living in poverty. Our public places need to adapt to our changing needs.*

Add to the Social infrastructure and well-being growth directives as follows:

- 1. ~~Community facilities are Social infrastructure:~~
  - o Is universally easy to use (through all life stages, including for young, aging and disabled people with disabilities).
  - o Meets the social, demographic and cultural needs of the community it serves.
  - o Is multi-use and flexible to changing community needs.
  - o Is safe and enjoyable spaces.
  - o Is provided on an equitable basis

To ensure there is a clear connection between the growth directives and explanations in the strategy when referring to “equitable basis”, we recommend including under the ‘network approach’ section on page 129, the following additions highlighted in bold:

***Providing social infrastructure on a network approach should also be provided on an equitable basis. This means considering each level (‘sub-regional/citywide’ or ‘local’) having different requirements to reflect the size of the area both in terms of population and physical boundaries, the expectations of the community, and the makeup of the community. Understanding where deficits are in the network and the likely flow on effects from diminished or improved provision provides opportunity to enhance supply relative to demand and need. Each community has a different starting point in terms of what is currently provided and their priorities, demographics and deprivation profile. While the strategy sets the intent of what we want to achieve, how we achieve it on the ground might be different from community to community.***

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Reference *Chapter 6 – Urban Form and Centres*.

Provide a reference in *Chapter 10 – Social Infrastructure and Wellbeing* to *Chapter 3 – Climate Resilience*, recognising that social infrastructure provision will need to respond to challenges posed by climate change.

Add a sentence to the end of the first paragraph on page 128 (*Social Infrastructure & Wellbeing – Introduction*). “Social infrastructure also plays a role in supporting the response to natural hazards and emergency management.

Add to the Climate resilience principles for *Chapter 10 – Social Infrastructure and Wellbeing* “integrate climate resilience”.

#### Advantages

- Provides clarity to the reader that the strategy as a whole includes consideration of social infrastructure and wellbeing. The provision of social infrastructure and wellbeing should not be considered in isolation. Many challenges identified by submitters are identified in the Strategy. For example Chapter 1 of the Strategy identifies key challenges that “natural hazards will be exacerbated by climate change”, and “providing housing and infrastructure for a growing population while reducing the exposure and vulnerability of development” (page 50).
- Clarity is provided regarding the need to consider the communities changes demographics particularly when providing social infrastructure.
- Reinforces the importance of providing social infrastructure and considering social wellbeing.

#### Disadvantages

- Could be considered repetitive and unnecessary.
- Could be perceived as not a significant enough change to address all of the submitters concerns, as the proposed changes are reinforcing the proposed direction of the strategy.

#### Financial implications

N/A

#### Other considerations

N/A

**Option 2: Note the submissions and make no changes.**

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<b>Advantages</b> <ul style="list-style-type: none"><li>The Strategy already contains the information the submitters seek and therefore any wording changes to <i>Chapter 10 – Social Infrastructure and Wellbeing</i> would not result in any changes in implementation of the strategy.</li></ul>	<b>Disadvantages</b> <ul style="list-style-type: none"><li>Doesn't respond to the concerns of submitters.</li><li>Doesn't provide clarity to the reader of <i>Chapter 10 – Social Infrastructure and Wellbeing</i> that the issues raised in the other chapters apply to the provision of Social Infrastructure.</li></ul>
<b>Financial implications</b>	
<b>N/A</b>	
<b>Other considerations</b>	
<b>N/A</b>	

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**Recommended Decision****Issue 1: Consistency and clarity on definition of terms used when talking about social infrastructure.**

**Option 1:** For clarity, add a description of social infrastructure within the introduction section to *Chapter 10 – Social Infrastructure and Wellbeing*:

“Social infrastructure includes those community facilities, services and networks that support individuals, families, groups and communities, such as public open space, parks and reserves, libraries, pools, community centres, indoor sports centres and halls, educational institutions, healthcare facilities and marae.”

**Issue 2: Ensuring integration of social infrastructure within the strategy objectives and alignment between Chapter 10 and other chapters in the SmartGrowth strategy.**

**Option 1:** Include a reference in *Chapter 10 – Social Infrastructure and Wellbeing* to link to *Chapter 4 – Te Taiao – Our Environment* which recognises open space, green space (parks and reserves, regional and sub-regional parks, walkways & cycleways, access to the environment).

An objective relating to social infrastructure and wellbeing would link the social infrastructure growth directives more clearly with the Strategy as a whole. It is recommended to add an additional objective to Page 17 for social wellbeing:

- Enable and support social infrastructure that is accessible and meets the needs of our community – where they can connect, socialise, learn and participate in a wide range of social, cultural, art, sporting and recreational activities, as well as broader support for community wellbeing.

Amend the Social infrastructure and well-being key challenges as follows:

- 3. Demographics and needs are continuing to change, increasing the need for further amenities to support higher living densities as well as those in need. We have an ageing population, but we also have an increasing number of young people, particularly in the Māori population. Community members have a range of socio-economic experience, including people living in poverty. Our public places need to adapt to our changing needs.
- Social infrastructure:
  - o Is universally easy to use (through all life stages, including for young, aging and disabled people with disabilities).
  - o Meets the social, demographic and cultural needs of the community it serves.
  - o Is multi-use and flexible to changing community needs.
  - o Is safe and enjoyable spaces.
  - o Is provided on an equitable basis

To ensure there is a clear connection between the growth directives and explanations in the strategy when referring to “equitable basis”, we recommend

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including under the 'network approach' section on page 129, the following additions highlighted in bold:

**Providing social infrastructure on a network approach should also be provided on an equitable basis. This means considering** each level ('sub-regional/citywide' or 'local') having different requirements to reflect the size of the area both in terms of population and physical boundaries, the expectations of the community, and the makeup of the community. Understanding where deficits are in the network and the likely flow on effects from diminished or improved provision provides opportunity to enhance supply relative to demand and need. **Each community has a different starting point in terms of what is currently provided and their priorities, demographics and deprivation profile. While the strategy sets the intent of what we want to achieve, how we achieve it on the ground might be different from community to community.**

Amend the Social infrastructure and well-being key challenges as follows:

*3. Demographics and needs are continuing to change, increasing the need for further amenities to support higher living densities as well as those in need. We have an ageing population, but we also have an increasing number of young people, particularly in the Māori population. Community members have a range of socio-economic experience, including people living in poverty. Our public places need to adapt to our changing needs.*

Reference Chapter 6 – Urban Form and Centres.

Provide a reference in Chapter 10 – Social Infrastructure and Wellbeing to Chapter 3 – Climate Resilience, recognising that social infrastructure provision will need to respond to challenges posed by climate change.

Add a sentence to the end of the first paragraph on page 128 (Social Infrastructure & Wellbeing – Introduction). "Social infrastructure also plays a role in supporting the response to natural hazards and emergency management.

Add to the Climate resilience principles for Chapter 10 – Social Infrastructure and Wellbeing "integrate climate resilience".

#### Decision

*(To be completed in the decision-making meeting)*

#### Reason

*(To be completed in the decision-making meeting)*

**Date approved:**

**Approved by:**

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# SmartGrowth Strategy 2023–2073

## ISSUES AND OPTIONS PAPER

### Future Development Strategy

**Authors: Nichola Lennard and Craig Batchelar**

Topic	Part 4: Future Development Strategy
<b>Issues</b>	<ol style="list-style-type: none"> <li>1. Oppose</li> <li>2. Infrastructure Readiness</li> <li>3. Maps</li> <li>4. Support for the FDS</li> <li>5. Population Assumptions</li> <li>6. Settlement Pattern – Changes to Timing               <ol style="list-style-type: none"> <li>6(1) Te Tumu,</li> <li>6(2) Tauriko West</li> <li>6(3) Keenan Rd</li> </ol> </li> <li>7. Settlement Pattern – Adding Areas:               <ol style="list-style-type: none"> <li>7(1) – Wairākei South</li> <li>7(2) – Tara Rd</li> <li>7(3) – Residential growth in the East</li> <li>7(4) – Residential growth in Te Puke</li> <li>7(5) – Residential growth for Welcome Bay and Upper Ohauti</li> <li>7(6) – Intensification</li> <li>7(7) – Staging of Long term Development in the Eastern Corridor and Western Corridor</li> </ol> </li> <li>8. Settlement Pattern – Te Puna and surrounds</li> <li>9. FDS Implementation</li> </ol>

Staff Narrative
<p><u>Overview of feedback received</u></p> <p>Overall there were 34 submissions received under the FDS topic from the following submitters:</p> <ul style="list-style-type: none"> <li>• Linda</li> <li>• Andrew Goodall</li> <li>• Bill Basher</li> <li>• John Sanderson</li> <li>• Bruce Conlon</li> <li>• Julian Fitter</li> <li>• John Robson</li> <li>• Child Poverty Action Group</li> <li>• Urban Task Force</li> <li>• Bell Road Ltd Partnership</li> <li>• Transpower NZ Ltd</li> <li>• Stephanie Smith-Kerr</li> <li>• Aimee Palmer</li> </ul>

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- Ford Land Holdings Pty Ltd
- Tumu Kaituna 14 Trust
- NZ Kiwifruit Growers
- Bill McMaster
- Vincent Murphy
- Beth Bowden
- Ministry of Education
- Combined Tāngata Whenua Forum
- Ngā Pōtiki a Tamapahore Trust
- SmartGrowth (internal submission)
- Ngāi Tukairangi Trust
- Landsdale Development Ltd
- Element IMF Ltd
- Carole Gordon
- Classic Group
- Te Puke Economic Development Group
- Property Council NZ
- Paul Hickson
- Sustainable BOP Trust
- Pirirākau Tribal Authority
- Clear The Air & Tauranga Moana Fumigant Group

There were three submissions that oppose the Strategy. Four were received in general support. The remainder are requesting changes or seeking clarification.

The key issues from submissions are summarised as follows:

- Infrastructure and requests for this to be in place before development commences
- Population assumptions – whether the needs of different cohorts, in particular an ageing population, new immigrants and a youthful Māori population, has been accounted for. Questions raised over the projections.
- Timing of the settlement pattern – requests for certain growth areas to be moved forward, in particular Te Tumu
- Greater clarity sought over the Eastern Centre and the wider Western Corridor
- Requests for more growth / new development in certain areas (Te Puke, Welcome Bay, Upper Ohauiti, Wairākei South, Tara Rd)
- More housing for rural areas, particularly in the east
- Te Puna – requests for this area to be off limits and requests for further investigations into development
- Implementation – requests for a clear implementation and resourcing plan that is funded, requests for SmartGrowth to have a more enabling and fluid policy position.

Options to address submissions are addressed under the issue headings set out below.

The Industrial Land issue has been separated out and is dealt with under the Industrial Land topic.

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**Issue 1: Oppose the Strategy**

Three submitters have opposed the Strategy with no further information provided.

One submitter has opposed further greenfield development.

Two submitters have referenced the lack of development opportunities and the need for things to be done faster and better.

Note: No options have been prepared for this issue as the submissions are not specific and therefore it is not possible to develop options to address matters raised.

**Issue 2: Infrastructure Readiness**

General theme of infrastructure being put in place before development commences and more focus on infrastructure required. One submitter has requested the need for aggregate demand to be estimated and future quarries identified. One submitter has outlined that three waters, transport and other infrastructure will be significantly impacted by TCC proposed Plan Change 33. Another submitter has requested a staging plan / map for infrastructure along with further commitments around transport projects and their integration with development.

Transpower has requested the inclusion of reference to the National Policy Statement on Electricity Transmission and to show how the strategy has been informed by it; and that the existing National Grid be shown on specific maps. Transpower has submitted that the SmartGrowth Strategy does not include an assessment of the extent to which electricity supply is sufficient to support development, or recognition of the potential for transmission infrastructure to expand in the future to support electrification.

**Issue 3: Maps**

Various amendments requested to the maps, including:

Correction required as Paengaroa is shown as Pongakawa.

Map 17 – changes requested by the Ministry of Education around how schools are shown

Map 19 – correction to show the correct location of Keenan Rd

Request for changes to colours/outlines to make the maps easier to read

Map 2c – there is discomfort that archaeological sites and HAIL sites are on the same map

Figures 17 and 18 – Tara Rd Land shown as WBOP district but should be TCC.

Climate change related maps and figures – update with new information once this is available.

Other minor updates and clarifications.

Note: No options have been prepared for this issue as the submissions mostly relate to corrections to and clarifications on the maps. Wherever possible these corrections will be made.

**Issue 4: Support for the FDS**

Support for the direction of the FDS. Support for certain development areas being included, such as Ohauti South and Tauriko Business Estate.

Note: No options have been prepared for this as the submissions are in support.

**Issue 5: Population Assumptions**

There is a theme in these submissions of whether the needs of different cohorts, in particular an ageing population, new immigrants and a youthful Māori population, has been accounted for.

One submitter has suggested change profiles are needed to inform the strategy and that it is unclear how the strategy will respond to a high Māori birth-rate, increasing poverty, ethnic diversity, increasing demand for rental accommodation, rapid increase of more elders living longer, growth of retirement villages. The submitter has suggested that the strategy clearly indicate the changing demographic structure in:

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age cohort graphs, including the population structure of Tāngata Whenua; strengthen housing, transport, health and community social infrastructure sections to reflect higher levels of age and culturally relevant focussed service and detail sub-regional strategies necessary to align with the UN Decade for Healthy Ageing goals along with other key documents. The submission also requests that population data in the Strategy should be disaggregated wherever possible.

One submitter is seeking clarity around the scenario of 400,000 over the next 50 plus years versus statements that the population is projected to reach between 246,100 and 317,500 people in the next 30 years. The submitter has also stated that the Strategy discusses shortfalls in housing supply but does not put forward scenarios as to how many houses would be enough. The submission has requested that a significant and separate Implementation Plan to be worked through the Tāngata Whenua Forum on the matter of Māori housing.

One submitter has questioned the infill development projections and is sceptical these will be achieved.

One submitter has requested that SmartGrowth takes a flexible approach to future land supply (residential and business) that accounts for changing variables.

Another submitter has said that the projections for rural house growth are too low over the period and that the peak of the kiwifruit season is not fully accounted for – neither is tourism.

One submitter has said that Tauranga City Council's required housing numbers in PC33 are overstated and high density intensification at the Mount is not required to achieve the SmartGrowth housing numbers.

Another submitter has asked why TCC's Reasonably Expected to be Realised (RER) number (19,000 dwellings) isn't being used for the SG Strategy infill / intensification number.

#### **Issue 6: Settlement Pattern – Timing**

##### **6(1) – Te Tumu**

Requests for changes to settlement pattern staging, for Te Tumu to be moved forward, including supporting infrastructure.

##### **6(2) – Tauriko West**

Request for Tauriko West to be moved forward.

##### **6(3) – Keenan Rd**

Request for Keenan Rd to be moved forward.

#### **Issue 7: Settlement Pattern – Additional Areas**

##### **7(1) – Wairākei South**

Request to add Wairākei South to the FDS.

##### **7(2) – Tara Rd**

Nga Potiki a Tamapahore Trust have requested changes to Map 3 and to Map 18 to include Tara Rd.

##### **7(3) – Residential growth in the East**

Request for immediate residential growth at Paengaroa and Pongakawa. An assessment of Māori land suitable for housing solutions in Maketu and an extension of coastal settlements past Pukehina further east has also been requested to be explored. General requests for development of rural settlements in the East.

##### **7(4): Residential growth in Te Puke**

Request for immediate residential growth in the Te Puke township.

##### **7(5) – Residential growth for Welcome Bay and Upper Ohauti**

Request for the Upper Ohauti area to be identified as a lifestyle area.

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Two submitters have raised the possibility of further development in Welcome Bay in a general sense.

#### **7(6) – Intensification**

Requests for more intensification and less greenfields. Concerns raised around PC33.

#### **7(7) – Staging of Long term Development in the Eastern Corridor and Western Corridor**

Clarify the timing and status of the Eastern Centre and whether the full Western Corridor SDP area and the Eastern Centre would be needed within the 30-year timeframe. Request for clarity over the staging or relative priority of growth in the corridors.

Support for Upper Belk as a growth area from Element IMF Ltd.

Property Council concerned that insufficient work has been done on the Eastern Corridor.

Ministry of Education has submitted that the draft Strategy needs to be clearer about the status of the Eastern Centre, particularly if the Tauranga Western Corridor SDP is confirmed. The Ministry has requested that SmartGrowth clarify the timing and status of the longer term growth areas and clarify whether both the full Tauranga Western Corridor SDP area (including the potential growth areas) and the Eastern Centre would be needed within the 30-year timeframe. They have also requested staging or relative priority of growth in the corridors but have noted this could form part of the Implementation and Funding Plan.

The Urban Taskforce has requested that the SmartGrowth Partners need to ensure and adopt a much more flexible approach to ensuring there is future land supply available to provide for the growth needs of Tauranga.

#### **Issue 8: Te Puna and surrounds**

Pirakau seeks an 'off limit' layer of Te Puna and Huharua involving Whakamarama.

Property Council have requested that Te Puna be further investigated.

#### **Issue 9: FDS Implementation**

Request for a Project Plan and Resourcing Plan to deliver the FDS.

Request for clarity on how 'unanticipated' or 'out of sequence' development will be dealt with.

Greater clarify on geographic extent of FDS and which areas are in or out, eg rural villages in the East, Welcome Bay/Kairua.

The FDS should be a very stable policy instrument. It is implicit that where an area is identified for growth and the SmartGrowth Partners have agreed on its overall appropriateness, there should not be fundamental disagreement from any SmartGrowth Partner on the direction. The focus at that point should be on implementation, and not the Strategy itself.

Several submitters have requested that the SmartGrowth Strategy adopt a more enabling and fluid policy position. Key actions are required such as the ability to efficiently deliver and service land with respect to infrastructure. Feasibility assessments are required. The "lead time to Development" identified on page 144 of the Strategy needs actions included in the Strategy to support a reduction in the development timeframes.

### **Options Overview**

#### **Issue 1: Oppose the Strategy**

Note: No options have been prepared for this issue as the submissions are not specific and therefore it is not possible to develop options to address matters raised.

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<b>Issue 2: Infrastructure Readiness</b> <i>General theme of infrastructure being put in place before development commences and more focus on infrastructure required. One submitter has outlined that three waters, transport and other infrastructure will be significantly impacted by TCC proposed Plan Change 33. Another submitter has requested a staging plan / map for infrastructure along with further commitments around transport projects and their integration with development. Transpower has requested more detail on electricity supply.</i>	
Option 2A	<b>Status Quo – no changes to infrastructure information in the Strategy:</b> Note the submissions and make no changes
Option 2B	<b>Make small changes to infrastructure information in the Strategy (recommended):</b> Note that the strategy contains a number of directives around infrastructure being put in place to support development. Direct some of the requests contained in the submissions to the Implementation and Funding Plan or to other processes (eg PC33 as a separate statutory process – it is not for SmartGrowth to direct). Make changes to include reference to NPS-ET in the 'Requirements' diagram on page 47 and refer to background papers and other information.
<b>Issue 3: Maps</b> <i>Note: No options have been prepared for this issue as the submissions relate to corrections to and clarifications on the maps. Wherever possible these corrections will be made.</i>	
<b>Issue 4: Support for the FDS</b> <i>Note: No options have been prepared for this as the submissions are in support.</i>	
<b>Issue 5: Population Assumptions</b> <i>There is a theme in these submissions of whether the needs of different cohorts, in particular an ageing population, new immigrants and a youthful Māori population, has been accounted for. Clarity has been sought over the population scenario vs population projections. Some submitters have questioned the projections around infill development and also for rural housing growth. Questions have been raised over the numbers used in Tauranga City's Proposed Plan Change 33.          There has also been a request for a separate implementation plan to be worked through the Combined Tāngata Whenua Forum on the matter of Māori housing. Several submitters have requested that SmartGrowth take a flexible approach to future land supply that accounts for changing variables.</i>	
Option 5A	<b>Status Quo – no changes to demographics (recommended):</b> Note the submissions and make only minor changes to the Strategy. Provide clarity on areas where concerns have been raised. Note that further work on demographics, including disaggregating more general demographic change information, will be undertaken through the implementation phase. This will feed into specific programmes (eg housing and transport). Acknowledge the work that is underway in terms of infrastructure and service provision that is suitable and accessible for all abilities. Refer other matters such as Māori Housing to the Implementation and Funding Plan. Refer concerns over PC33 to that process.

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Option 5B	<p><b>Make the changes requested around demographics.</b></p> <p>Include further detail on different cohorts in the demographic figures. Provide greater clarity on the numbers used. Amend projections to reflect a greater level of growth in the rural areas to account for seasonal variations. Reduce the numbers allocated to infill and intensification. Address matters raised over PC 33 (eg making statements around infrastructure to support intensification or reducing intensification numbers). Allow for a separate Māori housing plan to be developed. Add in more flexibility to the strategy around the settlement pattern.</p>
<p><b>Issue 6(1): Settlement Pattern – Timing: Te Tumu</b> <i>Requests for changes to settlement pattern staging, for Te Tumu to be moved forward, including supporting infrastructure.</i></p>	
Option 6(1)A	<p><b>Status Quo: Note the submissions and make no changes to move Te Tumu forward:</b></p>
Option 6(1)B	<p><b>Move Te Tumu forward. Include the provision infrastructure as requested by submitters.</b></p>
Option 6(1)C	<p><b>Acknowledge ability to move areas forward (recommended):</b> No changes to the staging as set out in the Strategy but specific text to acknowledge that should infrastructure funding and other matters be addressed there is the potential for areas to be brought forward. Be clear that Te Tumu is still a high priority growth area. Add text to Part 4 (FDS), 'Residential Growth Allocations for the next 30 years' (page 146) as follows: <i>There is the ability for the staging of growth areas to change. In particular, certain growth areas may be brought forward in time provided infrastructure funding or other matters are addressed.</i> Add the following footnote to Te Tumu in the Residential Growth Allocations table: <i>Te Tumu remains a high priority growth area for the SmartGrowth Strategy. The timing of this area may be brought forward if infrastructure funding and other matters are addressed.</i> <i>SmartGrowth and the relevant councils will continue to work with the Te Tumu landowners on progressing this growth area.</i></p>
<p><b>Issue 6(2): Settlement Pattern – Timing: Tauriko West</b> <i>Request from the Urban Task Force to move the residential allocation for Tauriko West forward.</i></p>	
Option 6(2)A	<p><b>Status Quo:</b> Note the submissions and make no changes</p>
Option 6(2)B	<p><b>Move Tauriko West forward.</b></p>
Option 6(2)C	<p><b>Acknowledge ability to move areas forward (recommended):</b> No changes to the staging as set out in the Strategy but specific text to acknowledge that should infrastructure funding and other matters be addressed there is the potential for areas to be brought forward.</p>
<p><b>Issue 6(3): Settlement Pattern – Timing: Keenan Rd</b> <i>Request from the Urban Task Force to move the residential allocation for Keenan Rd forward.</i></p>	
Option 6(3)A	<p><b>Status Quo:</b> Note the submissions and make no changes</p>

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Option 6(3)B	<b>Move Keenan Rd forward.</b>
Option 6(3)C	<b>Acknowledge ability to move areas forward (recommended):</b> No changes to the staging as set out in the Strategy but specific text to acknowledge that should infrastructure funding and other matters be addressed there is the potential for areas to be brought forward.
<b>Issue 7(1): Settlement Pattern – Additional Areas: Wairākei South</b> <i>Request to add Wairākei South to the FDS from Bell Rd Ltd Partnership.</i> <b>Note: Link to Industrial Land Issues and Options Paper which considers Wairākei South. The options outlined here align with the Industrial Land topic.</b>	
Option 7(1)A	<b>Status Quo – Do not identify Wairākei South as a potential long term growth area for residential and/or business land in the current FDS (recommended).</b> Make no changes to the strategy to include the additional area. Defer the consideration of Wairākei South for urban development and in the first instance, to consider catchment management options to manage natural hazard risk and ecology and water quality effects in the wider catchment including the Kaituna River.
Option 7(1)B	<b>Include Area: Identify Wairākei South as a ‘Potential long term growth area’ in Map 18 of the FDS</b>
Option 7(1)C	<b>Include a notation to identify Wairākei South as a potential future growth area if issues are overcome:</b> Make no further changes to the strategy to include the additional areas, but include a notation to identify Wairākei South as potential further growth area if specific matters are addressed and overcome (natural hazards).
<b>Issue 7(2): Settlement Pattern – Additional Areas: Tara Rd</b> <i>Requested for changes to Map 3 and to Map 18 to include Tara Rd as part of the settlement pattern from Nga Potiki a Tamapahore Trust.</i> <b>Note: Link to Industrial Land Issues and Options Paper which considers Wairākei South. The options outlined here align with the Industrial Land topic.</b>	
Option 7(2)A	<b>Status Quo – Do not identify Tara Rd as a potential long term growth area for residential and/or business land in the current FDS (recommended).</b> Make no changes to the strategy to include the additional area. Defer the consideration of Tara Rd for urban development and in the first instance, to consider catchment management options to manage natural hazard risk and ecology and water quality effects in the wider catchment including the Kaituna River.
Option 7(2)B	<b>Include Area: Identify Tara Rd as a ‘Potential long term growth area’ in Map 18 of the FDS</b>
Option 7(2)C	<b>Include a notation to identify Tara Rd as a potential future growth area if issues are overcome:</b> Make no further changes to the strategy to include the additional area, but include a notation to identify Tara Rd as potential further growth area if specific matters are addressed and overcome (natural hazards).
<b>Issue 7(3) Settlement Pattern – Additional Areas: Residential growth in the East</b> <i>Request for immediate residential growth at Paengaroa and Pongakawa. An assessment of Māori land suitable for housing solutions in Maketu and an extension of coastal settlements past Pukehina further east has also been requested to be explored. General requests for development of rural settlements in the East.</i>	

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Option 7(3)A	<b>Status Quo – make no changes to include additional residential areas in the East (recommended):</b> Make no changes to the strategy to include the additional areas. Clarify in Part 4 (page 145) of the Strategy that the FDS relates to urban development: <i>The FDS relates to urban development only and does not consider rural development.</i>
Option 7(3)B	<b>Change the Settlement Pattern to include the additional areas in the East (adding Paengaroa and Pongakawa)</b>
Option 7(3)C	<b>Refer to Implementation and Funding Plan:</b> Make no changes to the strategy to include the additional areas, but note that further on housing opportunities in eastern villages could be undertaken through the Implementation Plan.
<b>Issue 7(4) Settlement Pattern – Additional Areas: Residential growth in Te Puke</b> <i>Request for immediate residential growth in the Te Puke township.</i>	
Option 7(4)A	<b>Status Quo</b> – Make no changes to the strategy to include further development for Te Puke. Note that a spatial plan for Te Puke is underway <b>(recommended)</b>
Option 7(4)B	<b>Include Areas:</b> Change the Settlement Pattern to include further growth in the Te Puke township.
<b>Issue 7(5) Settlement Pattern – Additional Areas: Residential growth for Welcome Bay and Upper Ohauiti</b> <i>Request for the Upper Ohauiti area to be identified as a lifestyle area (rural residential development) from LandPlay Ltd.</i> <i>Two submitters have raised the possibility of further development in Welcome Bay in a general sense.</i>	
Option 7(5)A	<b>Status Quo – no changes to include Welcome Bay and Upper Ohauiti (recommended)</b> Make no changes to the strategy to include the additional areas.
Option 7(5)B	<b>Include the Welcome Bay and Upper Ohauiti Areas:</b> Change the Settlement Pattern to include the additional areas
<b>Issue 7(6) Settlement Pattern – Additional Areas: Intensification</b> <i>Submissions which have requested greater levels of intensification than currently allocated. One submitter has questioned the levels of intensification and infill.</i> <i>Concerns raised around PC33.</i>	
Option 7(6)A	<b>Status Quo – no changes to the intensification numbers in the Strategy (recommended):</b> Make no changes to the intensification numbers in the strategy. Add the following statement in Part 4 (FDS) at page 145: <i>It is the intention of the Strategy to achieve a more compact urban form through the Connected Centres Development Strategy. The aim is to target at least 40% of new development through intensification and infill over time.</i>
Option 7(6)B	<b>Increase Intensification:</b> Allow for greater levels of intensification. Provide greater direction in terms of PC33.
<b>Issue 7(7) Settlement Pattern – Staging of Long term Development in the Eastern Corridor and Western Corridor</b> <i>Requests to clarify the timing and status of the Eastern Centre and whether the full Western Corridor Specified Development Project (SDP) area and the Eastern Centre would be needed within the 30-year timeframe. Request for clarity over the staging or</i>	

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<i>relative priority of growth in the corridors. Property Council concerned that insufficient work has been completed on the Eastern Corridor.</i>	
Option 7(7)A	<b>Status Quo: Make no changes to the strategy to clarify the timing and status of the Eastern Centre and Western Corridor.</b>
Option 7(7)B	<p><b>Option 7(7)B: Provide Greater Clarity around Longer Term Areas (Recommended):</b> Amend the residential allocation table to acknowledge that both the Eastern Centre and Western Corridor (Upper Belk Road) may be needed within the 30 year timeframe. Add a range of 1,000 – 4,000 houses into the long-term residential allocation column for the Eastern Centre and Upper Belk. Add a clear notation to the residential allocation table and on Map 18 that the timing for these areas is still subject to investigation. Amend maps to include Upper Belk Road as a Long-Term growth area. Be clear that Upper Belk Road is the next location for growth in the Western Corridor following Tauriko West and Keenan Rd. This is supported by the Industrial IOP which identifies Upper Belk Road as an area for business land in the long-term, and the supporting industrial land studies.</p> <p>Clarify the terminology around 'potential long-term growth area' and 'long-term growth areas' – ensure the maps align with these terms. Add the following footnote to Map 18: <i>Further work is required to determine staging, spatial extent and mix of land uses for the Eastern Centre and Western Corridor (Upper Belk Road)</i></p> <p>Recommend that the Western Corridor be added as a Priority Development Area.</p>
Option 7(7)C	<p><b>Option 7(5)C: Remove Wider Western Corridor and Eastern Centre from Map 18:</b></p> <p>Remove the Wider Western Corridor and Eastern Centre from the 30 year FDS map (Map 18) and display as longer term (30 years +) only</p>
<p><b>Issue 8: Te Puna and Surrounds</b></p> <p><i>Request for an 'off limit' layer for Te Puna and Huharua involving Whakamarama. Requests that Te Puna be further investigated for development.</i></p>	
Option 8A	<p><b>Status Quo – no changes regarding Te Puna in the Strategy (recommended):</b></p> <p>Make no changes to the strategy.</p> <p>Note that Te Puna is not identified as a longer-term growth area in the FDS, however it is identified as a 'potential long-term growth area' on other maps. Refer submitters to the further work that WBOPDC are planning for Te Puna. Ensure that the spatial extent of Te Puna shown in the SmartGrowth maps aligns with the area WBOPDC are proposing to prepare the spatial plan for. Clarify the terminology around 'potential long-term growth area' and long-term growth areas.</p>
Option 8B	<p><b>Remove Te Puna as a potential long-term growth area:</b></p> <p>Remove Te Puna as a 'potential long-term' growth area in the strategy.</p>
<p><b>Issue 9: FDS Implementation</b></p> <p><i>Request for a Project Plan and Resourcing Plan to deliver the FDS. Request for clarity on how 'unanticipated' or 'out of sequence' development will be dealt with. Greater clarify on geographic extent of FDS and which areas are in or out,</i></p>	

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<i>eg rural villages in the East, Welcome Bay/Kairua. Requests that SmartGrowth partners should support implementation of the settlement pattern.</i>	
Option 9A	<p><b>Status Quo – only minor changes to the Strategy and refer other matters to the implementation and funding plan (recommended):</b></p> <p>Make only minor changes to the strategy and refer other matters to the Implementation and Funding Plan. This includes putting Map 19 (Western Bay of Plenty Housing) into the Implementation and Funding Plan rather than the FDS section of the Strategy. Add the following text to Part 4 (FDS) to clarify effect of SmartGrowth and the FDS: <i>Local authorities must have regard to the FDS when preparing or changing RMA planning documents; and is strongly encouraged to use the relevant FDS to inform long-term plans, and particularly infrastructure strategies; regional land transport plans and any other relevant strategies and plans.</i></p>
Option 9B	<p><b>Option 9B: Make changes to the strategy to include more detail on implementation:</b></p> <p>Provide greater clarity on implementation and funding plan actions and more information on how 'unanticipated' or 'out of sequence' development requests will be dealt with.</p>

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**Issue 1: Oppose** – No options have been prepared for this issue as the submissions are not specific and therefore it is not possible to develop options to address matters raised.

### Issue 2: Infrastructure Readiness

General theme of infrastructure being put in place before development commences and more focus on infrastructure required. One submitter has requested that aggregate demand be estimated and future quarries identified. One submitter has outlined that three waters, transport and other infrastructure will be significantly impacted by TCC proposed Plan Change 33. Another submitter has requested a staging plan / map for infrastructure along with further commitments around transport projects and their integration with development.

Transpower has requested the inclusion of reference to the National Policy Statement on Electricity Transmission (NPS-ET) and to show how the strategy has been informed by it; and that the existing National Grid be shown on specific maps. Transpower has submitted that the SmartGrowth Strategy does not include an assessment of the extent to which electricity supply is sufficient to support development, or recognition of the potential for transmission infrastructure to expand in the future to support electrification.

Note: The Infrastructure IOP has also considered submissions from Transpower. There is alignment between the options and recommendations.

### Option 2A: Status Quo: Note the submissions and make no changes to the infrastructure information in the Strategy.

#### Advantages

- Keeps the current approach in the Strategy which is based on technical assessments and other background information.

#### Disadvantages

- Doesn't address any of the submitters concerns
- Does not provide confidence that the strategy has considered key infrastructure matters
- Lost opportunity to spatially identify infrastructure required and put in place a spatial staging plan

#### Financial implications

None.

#### Other considerations:

##### Electricity

A background paper on infrastructure has been prepared which informed the development of the strategy. Transpower is a key stakeholder and has been engaged throughout strategy development. Transpower has recently completed the long list consultation on the Western Bay of Plenty Development Plan – SmartGrowth is aware of this work and will continue to engage with Transpower on it. The Industrial Land Study also engaged with Transpower.<sup>1</sup>

<sup>1</sup> See SmartGrowth Industrial Land Study – Further Investigations Report, October 2023: [https://assets-global.website-files.com/639c0b75c31ac6442f8d9994/6570d71d5431d0853240f315\\_SmartGrowth%20Industrial%20land%20Study%20Further%20Information%20Report%20Oct%2023.pdf](https://assets-global.website-files.com/639c0b75c31ac6442f8d9994/6570d71d5431d0853240f315_SmartGrowth%20Industrial%20land%20Study%20Further%20Information%20Report%20Oct%2023.pdf)

The Electricity Authority and the Commerce Commission have important roles to play. The Electricity Authority Te Mana Hiko has responsibility for governing the electricity market including regulation and monitoring. The Commerce Commission are the economic regulators setting longer term frameworks and approving larger transmission investments, profits and quality targets. The Commission also reviews Transpower's proposed work five-year work plan.

#### **Implementation and Funding**

The Implementation and Funding Plan provides an important mechanism for developing specific actions and further detail (such as infrastructure staging) that will support the implementation of the strategy. Striking a balance between the land use and infrastructure information set out the Strategy and FDS and in the Implementation and Funding Plan is a new and evolving issue. The Implementation and Funding Plan can provide finer grained information on provision and funding and will be continuously monitored and updated (quarterly). The Implementation and Funding Plan can also provide information on delivery arrangements: who is doing what and when. These arrangements will change over time and are inappropriate for inclusion in the Strategy and FDS which will be reviewed infrequently.

Note that a risk assessment will form part of the Implementation Plan.

#### **Plan Change 33 (Tauranga)**

PC33 is the subject of a separate statutory process. Decisions have not yet been released on this plan change.

**Option 2B: Make small changes to the infrastructure information in the Strategy (recommended):** Note that the strategy contains a number of directives around infrastructure being put in place to support development. Direct some of the requests contained in the submissions to the Implementation and Funding Plan or to other processes (eg PC33 as a separate statutory process – it is not for SmartGrowth to direct). Make changes to include reference to NPS-ET in the 'Requirements' diagram on page 47, make changes to Map 15 to clearly show the National Grid and refer to background papers and other information.

#### **Advantages**

- Partly addresses the points raised by submitters and provides a pathway for dealing with the matters highlighted (eg the infrastructure staging plan / map could be addressed in the Implementation and Funding Plan)
- Directs certain matters to the correct process (eg PC 33)
- Addresses specific matters such as the Transpower submission points
- Provides confidence that the strategy has considered key infrastructure matters.

#### **Disadvantages**

- Matters raised by submitters are not directly addressed in the Strategy and are referred to the Implementation and Funding Plan or other processes

#### **Financial implications**

None

#### **Other considerations:**

**Electricity**

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A background paper on infrastructure has been prepared which informed the development of the strategy. Transpower is a key stakeholder and has been engaged throughout strategy development. Transpower has recently completed the long list consultation on the Western Bay of Plenty Development Plan – SmartGrowth is aware of this work and will continue to engage with Transpower on it. The Industrial Land Study also engaged with Transpower.<sup>2</sup>

In terms of electricity, the Electricity Authority and the Commerce Commission have important roles to play. The Electricity Authority Te Mana Hiko has responsibility for governing the electricity market including regulation and monitoring. The Commerce Commission are the economic regulators setting longer term frameworks and approving larger transmission investments, profits and quality targets. The Commission also reviews Transpower's proposed work five-year work plan.

#### **Implementation and Funding**

The Implementation and Funding Plan provides an important mechanism for developing specific actions and further detail (such as infrastructure staging) that will support the implementation of the strategy. Striking a balance between the land use and infrastructure information set out the Strategy and FDS and in the Implementation and Funding Plan is a new and evolving issue. The Implementation and Funding Plan can provide finer grained information on provision and funding and will be continuously monitored and updated (quarterly). The Implementation and Funding Plan can also provide information on delivery arrangements: who is doing what and when. These detailed arrangements will change over time and are inappropriate for inclusion in the Strategy and FDS which will be reviewed less frequently.

Note that a risk assessment will form part of the Implementation Plan.

#### **Plan Change 33 (Tauranga)**

PC33 is the subject of a separate statutory process. Decisions have not yet been released on this plan change.

It is also noted that the Electricity Authority Te Mana Hiko has responsibility for governing the electricity market including regulation and monitoring.

**Issue 3: Maps** – No options have been prepared for this issue as the submissions relate to corrections to and clarifications on the maps. Wherever possible these corrections will be made.

**Issue 4: Support for the FDS** – No options have been prepared for this as the submissions are in support.

#### **Issue 5: Population Assumptions**

There is a theme in these submissions of whether the needs of different cohorts, in particular an ageing population, new immigrants and a youthful Māori population, has been accounted for. Clarity has been sought over the population scenario vs population projections. Submitters, such as Classic Group, have questioned the projections around infill development and Te Puke Economic Development Group and Paul Hickson have also said that rural housing growth should be higher. Questions have been raised over the numbers used in Tauranga City's Proposed Plan Change 33.

<sup>2</sup> See SmartGrowth Industrial Land Study – Further Investigations Report, October 2023: [https://assets-global.website-files.com/639c0b75c31ac6442f8d9994/6570d71d5431d0853240f315\\_SmartGrowth%20Industrial%20land%20Study%20Further%20Information%20Report%20Oct%2023.pdf](https://assets-global.website-files.com/639c0b75c31ac6442f8d9994/6570d71d5431d0853240f315_SmartGrowth%20Industrial%20land%20Study%20Further%20Information%20Report%20Oct%2023.pdf)

*There has also been a request for a significant and separate implementation plan to be worked through the Combined Tāngata Whenua Forum on the matter of Māori housing.*

*There have also been requests for SmartGrowth to take a flexible approach to future land supply (residential and business) that accounts for changing variables.*

Note: Both the Housing and transport IOPs have also considered some submissions relating to demographics. There is alignment between the options and recommendations.

**Option 5A: Status Quo: Note the submissions and make only minor changes to the Strategy (Recommended).** Provide clarity on areas where concerns have been raised. Note that further work on demographics, including disaggregating more general demographic change information, will be undertaken through the implementation phase. This will feed into specific programmes (eg housing and transport). Acknowledge the work that is underway in terms of infrastructure and service provision that is suitable and accessible for all abilities. Refer other matters such as Māori Housing to the Implementation and Funding Plan. Refer concerns over PC33 to that process (eg issues raised around enabling too much capacity).

Note that the Housing IOP has recommended updating the housing systems challenges in the Strategy to note the changing ethnic diversity requiring different housing market responses (e.g. for more intergenerational living), and that a new Housing system growth directive be added “*Ensure place-based housing plans clearly respond to the needs of an older and more ethnically diverse population*”. This will go some way towards addressing submitter concerns around anticipating the needs of different cohorts. The Transport IOP has also recommended some minor improvements to the SmartGrowth Strategy to better reflect demographic change in the sub-region and to acknowledge that there are a number of projects underway that will address this.

#### **Advantages**

##### **Demographics**

- The current strategy does outline the demographic changes with a particular focus on the ageing population, ethnicities and the youthful Māori population (Part 1 – sub-regional context). The requests being made by submissions is to translate this into outcomes and actions. This is something that is best dealt with at a local level (eg through local spatial plans, through the Implementation and Funding Plan and through the Housing System Plan). The advantage of not making these changes is that it keeps the SmartGrowth Strategy at the right level and leaves implementation of specific areas to other mechanisms.

##### **Projections**

- The SmartGrowth Strategy projections are evidenced based. Not making changes ensures that the Strategy remains robust and

#### **Disadvantages**

##### **Demographics**

- Does not address concerns raised by submitters.

##### **Projections**

- Does not address concerns raised by submitters.

##### **PC33**

- The Strategy may not be clear about the potential impact of PC 33 (noting that this is an uncertain area given the change of Government)

##### **Implementation Plan for Māori Housing**

- There may be concern that the matter of Māori housing is not adequately highlighted if it forms part of the SmartGrowth Implementation and Funding Plan

##### **Flexibility**

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<p>supported by factual information. The matter of rural housing and intensification/infill has been addressed in the SmartGrowth Housing &amp; Business Capacity Assessment 2022. The Strategy does provide a range for intensification and infill given that there are significant uncertainties.</p> <p><b>PC33</b></p> <ul style="list-style-type: none"> <li>Avoids cross over with a separate RMA plan change process (noting that this is an uncertain area with the change of Government).</li> </ul> <p><b>Implementation Plan for Māori Housing</b></p> <ul style="list-style-type: none"> <li>Allows for further work to be done through the Implementation and Funding Plan and time to consider these matters further</li> </ul> <p><b>Flexibility</b></p> <ul style="list-style-type: none"> <li>Retains the current SmartGrowth Strategy approach for the FDS and avoids introducing too much uncertainty while acknowledging that a responsive approach can be taken (eg through Plan Change 6 to the RPS and future reviews of the FDS).</li> </ul>	<ul style="list-style-type: none"> <li>Submitters may be of the view that there is insufficient flexibility built into the Strategy and therefore have ongoing concerns over the FDS.</li> </ul>
<b>Financial considerations</b>	
None	
<b>Other Considerations</b>	
<p>Work is ongoing in terms of Tāngata Whenua Spatial Planning. This will include a Māori Housing component. The Housing System Plan will also cover Māori housing.</p> <p>UFTI used a scenario based approach which is common in spatial planning. It set out a scenario of 400,000 people and provided the strategy over the next 30–50 years to address that level of growth. SmartGrowth takes the same approach. However, within the next 30 years we also require further detail on population projections so the Strategy relies on our evidence base, including the Housing and Business Assessment, to quantify an estimate of population growth over the next 30 years of between 246,000 and 318,000. We need to do this to meet the requirements of the NPS-UD. These two figures are not inconsistent.</p> <p>Some submitters have raised the issue of TCC using an intensification figure of 19,000 for PC33 while SmartGrowth contains a different figure. The SmartGrowth Strategy contains a range for the intensification areas of between 11,400 – 15,000 houses. The reason for the difference is that PC33 is wider in geographic scope than the 'Intensification Areas' identified in SmartGrowth, and also includes intensification in greenfield areas.</p>	
<p><b>Option 5B: Make the changes requested around demographics.</b> Include further detail on different cohorts in the demographic figures. Provide greater clarity on the numbers used. Amend projections to reflect a greater level of growth in the rural areas to account for seasonal variations. Reduce the</p>	

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numbers allocated to infill and intensification. Address matters raised over PC 33 (eg making statements around infrastructure to support intensification or reducing intensification numbers). Allow for a separate Māori housing plan to be developed. Add in more flexibility to the strategy around the settlement pattern.

#### Advantages

- Addresses submitter concerns.
- Specifically addresses matters around population ageing, the needs of different ethnicities and a youthful Māori population.
- Provides greater clarity to submitters through amendments to the strategy.
- Signals a clear pathway for the consideration of Māori housing.
- Provides greater flexibility around the settlement pattern which reduces the need for assessments through the RPS or significant reviews of the FDS

#### Disadvantages

- Undermines the evidence base of the strategy if the information used is not robust.
- Would result in different numbers being used by SmartGrowth vs the partners
- May result in the HBA needing to be reviewed and amended.
- Would require further analysis and potentially a separate piece of work on what the implications are for different cohorts.
- The Strategy makes statements around matters that are the subject of an RMA process that is underway.
- Other statements are made in the strategy in order to clarify matters for submitters that become out of date (eg PC33 or references to a separate Māori housing plan that may not be implemented in that way)
- Making specific reference to a separate Māori housing plan without tying this into the Housing System Plan or the SmartGrowth Implementation and Funding Plan could result in a disconnect.
- Any further flexibility introduced into the strategy around the FDS is likely to make the settlement pattern uncertain which has implications for the provision of infrastructure and funding

**Financial considerations:** Any amendments to the projections or other supporting information could result in the need to review and update the evidence base which will have a cost implication.

**Other Considerations:** Data inconsistencies, eg between SmartGrowth, HBA, PC 33 and 92, Long-Term Plans

#### Issue 6(1): Settlement Pattern Timing – Te Tumu

*Requests for changes to settlement pattern staging, in particular for Te Tumu to be moved forward, including supporting infrastructure.*

**Option 6(1)A: Status Quo: Note the submissions and make no changes to move Te Tumu forward**

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<b>Advantages</b> <ul style="list-style-type: none"> <li>Aligns with initial TCC decisions around their Draft Long-Term Plan</li> <li>Retains flexibility with regards to the long term areas and when they may be brought into the settlement pattern</li> <li>Allows for further work to be done through the Implementation Plan and time to consider these matters further.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Lacking clear direction in the strategy around the importance of Te Tumu as a growth area</li> </ul>
<b>Financial implications</b>	
None.	
<p><b>Other considerations:</b> This matter directly relates to Tauranga City Council's Long-Term Plan. The Draft LTP 2024-2034 has proposed changes to the timing of infrastructure investment that would delay the release of land for development in the Keenan Road and Te Tumu growth areas to around 2040. This is largely due to funding constraints.</p> <p>As noted in the TCC LTP, Te Tumu also faces a range of other challenges to successfully rezone it for urban development. These relate to securing infrastructure corridors through Māori land, the wider views of tāngata whenua on the scale and appropriateness of urban development, and the impacts of government freshwater and indigenous biodiversity policy on urban development and associated infrastructure delivery. SmartGrowth has aligned with what has been put forward in the Draft LTP. Under the NPS-UD, the FDS is required to be informed by relevant long-term plans and infrastructure strategies.</p> <p>The SmartGrowth Strategy has staged development for Tauriko West with some housing expected in the short-term. There is no current evidence that supports moving development any further forward given the land has not yet been rezoned.</p>	
<b>Option 6(1)B: Move Te Tumu forward. Include the provision infrastructure as requested by submitters.</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Addresses submitters concerns.</li> <li>Provides support and clear direction for Te Tumu as a growth area</li> <li>Provides certainty for the landowner (Ford Land Holdings &amp; Tumu Kaituna 14 Trust) to then seek a private plan change to progress urban development of Te Tumu.</li> <li>Signals that the partnership wants development to occur earlier</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Out of step with the TCC LTP and other infrastructure providers</li> <li>Commits to infrastructure that is not able to be funded</li> <li>Doesn't meet the FDS requirements that development capacity needs to be aligned with supporting infrastructure or that an FDS must be informed by LTPs</li> </ul>
<b>Financial implications</b>	
TCC LTP (i.e. pressure to include infrastructure for the areas moved forward in the strategy)	
<b>Other considerations:</b> See above.	

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Western Corridor Specified Development Project (SDP)<sup>3</sup> – This is a Kāinga Ora led project which is currently underway. Recommendations have been made to the joint Ministers to establish the project as an SDP in early 2024. This area includes Tauriko West and Keenan Rd. Changes in the extent, timing, type, and scale of urban development may follow from this.

In terms of the infrastructure that Tumu Kaituna 14 Trust and Ford Land Holdings have put forward, discussions have been had with some of the key infrastructure providers. There are implications in identifying infrastructure early and without committed funding.

The submitters have specifically raised the matter of the Kaituna Link transport connection and have requested that this be included in the Strategy.

Kaitiuna Link has been the subject of a number of reports over the years. The most recent and comprehensive consideration of this project was by the SmartGrowth Implementation Committee in 2018. SmartGrowth resolved that Kaituna Link was not necessary to enable Te Tumu and the Eastern Corridor but that the structure plan should retain it as an option. The report also noted that the project could be reconsidered when the SmartGrowth Strategy is reviewed if more growth is allocated to the Eastern Corridor. The Strategy does not allocate significantly more growth to the Eastern Corridor within the 30 year period, however if the Eastern Centre is brought forward then that would alter the growth anticipated for the corridor. The land concerned is zoned rural so the route is broadly protected from development. This matter can be revisited when the FDS component of the SmartGrowth Strategy is reviewed in 3 years as there is likely to be more clarity over the timing of Te Tumu by that stage.

**Option 6(1)C: Acknowledge ability to move areas forward (Recommended):** No changes to the staging as set out in the Strategy but specific text to acknowledge that should infrastructure funding or other matters be addressed there is the potential for areas to be brought forward. Be clear that Te Tumu is still a high priority growth area. Add text to Part 4 (FDS), 'Residential Growth Allocations for the next 30 years' (page 146) as follows: *There is the ability for the staging of growth areas to change. In particular, certain growth areas may be brought forward in time provided infrastructure funding or other matters are addressed.* Add the following footnote to Te Tumu in the Residential Growth Allocations table: *Te Tumu remains a high priority growth area for the SmartGrowth Strategy. The timing of this area may be brought forward if infrastructure funding and other matters are addressed. SmartGrowth and the relevant councils will continue to work with the Te Tumu landowners on progressing this growth area.*

#### Advantages

- Partly addresses submitters concerns.
- Acknowledges that Te Tumu is an important growth area for the strategy given its scale and location
- Provides flexibility should infrastructure funding matters be resolved
- Aligns with initial TCC decisions around LTP – noting that there is further information to come in this regard prior to deliberations
- Allows for further work to be done through the Implementation Plan and time to consider these matters further

#### Disadvantages

- Misalignment between any plan change brought by Te Tumu and the staging set out in the Strategy

#### Financial implications

<sup>3</sup> <https://specified-development-projects-kaingaora.hub.arcgis.com/pages/western-corridor>

None
<b>Other considerations:</b> See considerations in options above.

<b>Issue 6(2): Settlement Pattern Timing – Tauriko West</b>	
Request from the Urban Task Force to move the residential allocation for Tauriko West forward.	
<b>Option 6(2)A: Status Quo: Note the submissions and make no changes</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Aligns with initial TCC decisions around their Draft Long-Term Plan</li> <li>Aligns with the information from TCC in terms of staging, noting that there is some flexibility with the staging table</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Doesn't give effect to submitters request to move the development forward</li> </ul>
<b>Financial implications</b>	
None.	
<b>Other considerations:</b> There will be an ability to review and update residential allocation figures when the FDS is reviewed in 3 years time. SmartGrowth has aligned with what has been put forward in the Draft LTPs. Under the NPS-UD, the FDS is required to be informed by relevant long-term plans and infrastructure strategies. The SmartGrowth Strategy has staged development for Tauriko West with some housing expected in the short-term. There is no current evidence that supports moving development any further forward given the land has not yet been rezoned. Note the text in option 6(1)C around the ability to move growth areas forward.	
<b>Option 6B: Move areas forward:</b> Move Tauriko West forward in line with the request from the Urban Task Force.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Addresses submitters concerns.</li> <li>Signals that the partnership wants development to occur earlier</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Out of step with the TCC LTP and other infrastructure providers</li> <li>Residential allocations out of step with the information provided from TCC</li> </ul>
<b>Financial implications</b>	
TCC LTP (i.e. pressure to include infrastructure for the areas moved forward in the strategy)	
<b>Other considerations:</b> See above.	

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Western Corridor Specified Development Project (SDP)<sup>4</sup> – This is a Kāinga Ora led project which is currently underway. Recommendations have been made to the joint Ministers to establish the project as an SDP in early 2024. This area includes Tauriko West and Keenan Rd. Changes in the extent, timing, type, and scale of urban development may follow from this.

**Option 6(2)C: Acknowledge ability to move areas forward (Recommended):** No changes to the staging as set out in the Strategy but specific text to acknowledge that should infrastructure funding or other matters be addressed there is the potential for areas to be brought forward. Note the text in option 6(1)C around the ability to move growth areas forward.

#### Advantages

- Partly addresses submitters concerns.
- Provides flexibility should infrastructure funding matters be resolved
- Aligns with initial TCC decisions around Draft LTP
- Allows for further work to be done through the Implementation Plan and time to consider these matters further

#### Disadvantages

- Doesn't give effect to submitters request to move the development forward

#### Financial implications

None

**Other considerations:** See considerations in options above.

#### Issue 6(3): Settlement Pattern Timing – Keenan Rd

Request from the Urban Task Force to move the residential allocation for Keenan Rd forward.

**Option 6(3)A: Status Quo:** Note the submissions and make no changes

#### Advantages

- Aligns with initial TCC decisions around their Draft Long-Term Plan
- Retains flexibility with regards to the long term areas and when they may be brought into the settlement pattern
- Allows for further work to be done through the Implementation Plan and time to consider these matters further.

#### Disadvantages

- Lacking clear direction in the strategy around the importance of Keenan Rd as a growth area

#### Financial implications

None.

<sup>4</sup> <https://specified-development-projects-kaingaora.hub.arcgis.com/pages/western-corridor>

<p><b>Other considerations:</b> This matter directly relates to Tauranga City Council's Long-Term Plan. The Draft LTP 2024–2034 has proposed changes to the timing of infrastructure investment that would delay the release of land for development in the Keenan Road and Te Tumu growth areas to around 2040. This is largely due to funding constraints.</p> <p>SmartGrowth has aligned with what has been put forward in the Draft LTP. Under the NPS-UD, the FDS is required to be informed by relevant long-term plans and infrastructure strategies.</p>	
<p><b>Option 6(3)B: Move areas forward:</b> Move Keenan Rd forward as requested by submitter.</p>	
<p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>• Addresses submitters concerns.</li> <li>• Provides support and clear direction for Keenan Rd as a growth area</li> <li>• Provides certainty for the landowner to then seek a plan change to progress urban development of Keenan Rd.</li> <li>• Signals that the partnership wants development to occur earlier</li> </ul>	<p><b>Disadvantages</b></p> <ul style="list-style-type: none"> <li>• Out of step with the TCC LTP and other infrastructure providers</li> <li>• Commits to infrastructure that is not able to be funded</li> <li>• Doesn't meet the FDS requirements that development capacity needs to be aligned with supporting infrastructure or that an FDS must be informed by LTPs</li> </ul>
<p><b>Financial implications</b></p>	
<p>TCC LTP (i.e. pressure to include infrastructure for the areas moved forward in the strategy)</p>	
<p><b>Other considerations:</b> See above.</p> <p>Western Corridor Specified Development Project (SDP)<sup>5</sup> – This is a Kāinga Ora led project which is currently underway. Recommendations have been made to the joint Ministers to establish the project as an SDP in early 2024. This area includes Tauriko West and Keenan Rd. Changes in the extent, timing, type, and scale of urban development may follow from this.</p>	
<p><b>Option 6(3)C: Acknowledge ability to move areas forward (Recommended):</b> No changes to the staging as set out in the Strategy but specific text to acknowledge that should infrastructure funding or other matters be addressed there is the potential for areas to be brought forward. Note the text in option 6(1)C around the ability to move growth areas forward.</p>	
<p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>• Partly addresses submitters concerns.</li> <li>• Acknowledges that Keenan Rd is an important growth area for the strategy</li> <li>• Provides flexibility should infrastructure funding matters be resolved</li> <li>• Aligns with initial TCC decisions around Draft LTP</li> </ul>	<p><b>Disadvantages</b></p> <ul style="list-style-type: none"> <li>• Doesn't give effect to submitters request to move the development forward</li> </ul>

<sup>5</sup> <https://specified-development-projects-kaingaora.hub.arcgis.com/pages/western-corridor>

<ul style="list-style-type: none"> <li>Allows for further work to be done through the Implementation Plan and time to consider these matters further</li> </ul>	
<b>Financial implications</b>	
None	
<b>Other considerations:</b> See considerations in options above.	
<b>Issue 7(1): Settlement Pattern – Additional Areas: Wairākei South (see Appendix 1 for a map of Wairākei South)</b> <i>Request to add Wairākei South to the FDS from Bell Rd Ltd Partnership.</i> <b>Note: Link to Industrial Land Issues and Options Paper which considers Wairākei South. The options outlined here align with the Industrial Land topic.</b>	
<b>Option 7(1)A: Status Quo – Do not identify Wairākei South as a potential long term growth area for residential and/or business land in the current FDS (Recommended).</b> Make no changes to the strategy to include the additional area. Defer the consideration of Wairākei South for urban development and in the first instance, to consider catchment management options to manage natural hazard risk and ecology and water quality effects in the wider catchment including the Kaituna River.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Aligns with evidence-based decisions made around the FDS settlement pattern (including those relating to constraints)</li> <li>Identifies that a catchment level approach is required to manage flood risk in the Bell Road catchment.</li> <li>Maintains the SmartGrowth position that supports a 'Go Carefully' approach to this area.</li> <li>Aligns with initial LTP decisions and other infrastructure planning (ie these areas have not been accounted for in LTPs)</li> <li>Lowers the risk of 'opening the door' to developments that may not be viable due to natural hazard constraints</li> <li>Aligns with the position of the relevant SmartGrowth partners</li> <li>Provides a potential pathway to the submitter for future consideration of the proposed Wairākei South urban growth area.</li> <li>Under this option consideration of Wairākei South for urban development would be deferred to the next FDS review in three years to enable catchment management options to manage natural hazard risk in the wider catchment and surrounding area to be evaluated.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>SmartGrowth could be seen as insufficiently responsive to development requests in the context of a significant housing and business land shortfall</li> <li>Wairākei South aligns well with the Connected Centres approach</li> <li>Lost opportunity cost with willing developer and large land parcels in single ownership, near strategic transport corridors and labour supply.</li> </ul>

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<b>Financial considerations</b>	
None	
<p><b>Other Considerations</b></p> <p>Wairākei South and Tara Rd have similar constraints relating to flooding, natural hazard risk and geotechnical issues. Wairākei South and Tara Rd have been considered as part of the SmartGrowth Industrial Land Study – see the following reports:</p> <ul style="list-style-type: none"> <li>• SmartGrowth Industrial Land Study – Technical Report (Aurecon, June 2023)</li> <li>• SmartGrowth Industrial Land Study – Supplementary Report (Phizacklea, May 2023)</li> <li>• SmartGrowth Industrial Land Study – Further Investigations (SmartGrowth, November 2023)</li> </ul> <p>As noted in the Industrial Land Issues and Options Paper the following are key considerations:</p> <ul style="list-style-type: none"> <li>• Under this option further information would be required to demonstrate how flooding, geotechnical and other natural hazard risk would be adequate avoided, remedied or mitigated. A pathway would still exist for the Bell Road Limited Partnership to seek a private plan change.</li> <li>• The Bell Road Limited Partnership provided engineering, geotechnical and planning statements at the SmartGrowth hearings. These statements of evidence rely on a number of untested technical and expert conclusions in the face of known flooding, natural hazard risk and geotechnical issues identified by engineering staff at BOPRC, TCC and WBOPDC.</li> <li>• The Bell Road catchment is currently serviced by a pumping scheme which indicates that flood risk is an existing issue. This suggests the Bell Road catchment is high risk and a precautionary approach should be adopted at this strategic planning step.</li> <li>• While the location and transport benefits are acknowledged, these would not outweigh the wider issue of providing for urban growth in an overallocated stormwater catchment and resulting costs of resilience if development were to occur in a piece-meal fashion within the catchment.</li> <li>• Acknowledgement of the Te Maru o Kaituna River Authority and the inconsistency of large-scale and incremental urban land use change in the surrounding and upstream catchments with the vision and objectives of the Kaituna River Document.</li> <li>• Consideration of the likely requirements arising from the Proposed National Policy Statement for Natural Hazard Decision Making 2023</li> </ul>	
<b>Option 7(1)B: Include Area: Identify Wairākei South as a 'Potential long term growth area' in Map 18 of the FDS</b>	
<p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>• Potentially addresses the housing and business land shortfall</li> <li>• Provides additional future business land capacity within the Eastern growth corridor.</li> <li>• The amount of additional business land required to be identified within the subregion by way of other potential long-term growth areas for business uses would be reduced.</li> <li>• Provides certainty for the landowner (Bell Road Limited Partnership) to then seek a private plan change to progress any urban development</li> </ul>	<p><b>Disadvantages</b></p> <ul style="list-style-type: none"> <li>• There is sufficient zoned business land within the Eastern growth corridor to meet expected demand over the next 30 years.</li> <li>• While statements of geotechnical and engineering evidence were submitted to the hearing, this technical information does not substantiate the suitability of the land for urban development to be confirmed and that there will be no impact on the wider catchment..</li> </ul>

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<p>of Wairākei South through the required rezoning process under the RMA.</p>	<ul style="list-style-type: none"> <li>• The SmartGrowth Industrial Land Study reports identify significant natural hazard issues within the wider area which would need to be addressed to enable consideration of Wairākei South for urban development.</li> <li>• Identifies land in the eastern growth corridor ahead of other investigations around Rangiora (Eastern Centre) and Te Puke (Te Puke Spatial Plan).</li> <li>• Urban development at Wairākei South may result in downstream water quality and ecology effects on the Kaituna River and surrounding and lower catchment area which has been the benefit of substantial downstream restoration works.</li> <li>• Misalignment with LTPs and other partner planning documents</li> <li>• Puts pressure on councils in particular to include these areas in their planning documents</li> <li>• Unlikely to meet the definition of 'well-functioning' urban environments in the NPS-UD (ie not resilient to the likely current and future effects of climate change)</li> </ul>
<p><b>Financial considerations:</b> Financial implications for the relevant council and infrastructure providers if these areas are brought in</p>	
<p><b>Other Considerations:</b> See considerations above.</p> <ul style="list-style-type: none"> <li>• The Bell Road Limited Partnership provided further information at the hearings in relation to their submission as statements of evidence from planning, geotechnical and engineering experts. No technical reports were provided.</li> <li>• Requirements of NPS-UD for sufficient capacity for housing and business land in each district.</li> <li>• It is recognised that there are constraints and opportunities in delivering the potential housing and business land growth areas to the market.</li> <li>• Acknowledge the Te Maru o Kaituna River Authority and inconsistency of large-scale and incremental urban land use change in the surrounding and upstream catchments with the vision and objectives of the Kaituna River Document.</li> <li>• Consideration of the likely requirements arising from the Proposed National Policy Statement for Natural Hazard Decision Making 2023.</li> </ul>	
<p><b>Option 7(1)C: Include a notation to identify Wairākei South as a potential future growth area if issues are overcome:</b> Make no further changes to the strategy to include the additional areas, but include a notation to identify Wairākei South as potential further growth area if specific matters are addressed and overcome (natural hazards).</p>	

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<b>Advantages</b> <ul style="list-style-type: none"> <li>• Bell Road is already identified as a possible site for industrial land in the draft FDS at page 149.</li> <li>• Partly addresses submitter requests around Wairākei South and Tara Rd – provides a pathway provided specific information is provided and constraints are overcome</li> <li>• Areas such as Wairākei South and Tara Rd align well with the Connected Centres approach</li> <li>• SmartGrowth is responsive to development proposals</li> <li>• By not amending the settlement pattern, it aligns with initial LTP decisions and other infrastructure planning</li> <li>• Maintains sufficient certainty around the FDS settlement pattern</li> <li>• Aligns with evidence-based decisions made around the FDS settlement pattern (including those relating to constraints)</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>• Lost opportunity cost.</li> <li>• Downstream water quality and ecology effects on the Kaituna River and surrounding and lower catchment area which has been the benefit of substantial downstream restoration works.</li> <li>• Signals that development could be a possibility in this area where that may not prove to be the case</li> </ul>
<b>Financial considerations</b>	
None	
<b>Other Considerations</b>	
<ul style="list-style-type: none"> <li>• Proposed National Policy Statement for Natural Hazard Decision-making 2023</li> <li>• Government Policy changes</li> <li>• Bell Road is specifically referred to as a potential site at page 149 of the draft FDS along with the other possible sites deemed suitable for industrial land uses. The three yearly review of the FDS required by the NPS-UD allows for any additional potential growth areas to be included in the strategy should these be able to be supported.</li> <li>• Under this option Wairākei South would be identified in some form in the FDS as subject to technical investigations. Future Proof included three other possible business land sites in their Strategy on a separate map as subject to further investigation.</li> <li>• Acknowledgement of the Te Maru o Kaituna River Authority and the inconsistency of large-scale and incremental urban land use change in the surrounding and upstream catchments with the vision and objectives of the Kaituna River Document.</li> </ul>	
<b>Issue 7(2): Settlement Pattern – Additional Areas: Tara Rd</b>	
<i>Requested for changes to Map 3 and to Map 18 to include Tara Rd as part of the settlement pattern from Nga Potiki a Tamapahore Trust.</i>	
<b>Note: Link to Industrial Land Issues and Options Paper which considers Wairākei South. The options outlined here align with the Industrial Land topic.</b>	
<b>Option 7(2)A: Status Quo – Do not identify Tara Rd as a potential long term growth area for residential and/or business land in the current FDS (Recommended).</b> Make no changes to the strategy to include the additional area. Defer the consideration of Tara Rd for urban development and in the	

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first instance, to consider catchment management options to manage natural hazard risk and ecology and water quality effects in the wider catchment including the Kaituna River.

#### Advantages

- Aligns with evidence-based decisions made around the FDS settlement pattern (including those relating to constraints)
- Identifies that a catchment level approach is required to manage flood risk.
- Maintains the SmartGrowth position that supports a 'Go Carefully' approach to this area.
- Aligns with initial LTP decisions and other infrastructure planning (ie these areas have not been accounted for in LTPs)
- Lowers the risk of 'opening the door' to developments that may not be viable due to natural hazard constraints
- Aligns with the position of the relevant SmartGrowth partners
- Provides a potential pathway to the submitter for future consideration of Tara Rd as an urban growth area.
- Under this option consideration of Tara Rd for urban development would be deferred to the next FDS review in three years to enable catchment management options to manage natural hazard risk in the wider catchment and surrounding area to be evaluated.

#### Disadvantages

- SmartGrowth could be seen as insufficiently responsive to development requests in the context of a significant housing and business land shortfall
- Tara Rd aligns well with the Connected Centres approach
- Unsupportive of a potential Māori development initiative at Tara Rd

#### Financial considerations

None

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**Other Considerations**

Wairākei South and Tara Rd have similar constraints relating to flooding, natural hazard risk and geotechnical issues. Wairākei South and Tara Rd have been considered as part of the SmartGrowth Industrial Land Study – see the following reports:

- SmartGrowth Industrial Land Study – Technical Report (Aurecon, June 2023)
- SmartGrowth Industrial Land Study – Supplementary Report (Phizacklea, May 2023)
- SmartGrowth Industrial Land Study – Further Investigations (SmartGrowth, November 2023)

As noted in the Industrial Land Issues and Options Paper the following are key considerations:

- Under this option further information would be required to demonstrate how flooding, geotechnical and other natural hazard risk would be adequately avoided, remedied or mitigated. A pathway would still exist for Nga Potiki a Tamapahore Trust to seek a private plan change.
- The Bell Road Limited Partnership provided engineering, geotechnical and planning statements at the SmartGrowth hearings. These statements of evidence rely on a number of untested technical and expert conclusions in the face of known flooding, natural hazard risk and geotechnical issues identified by engineering staff at BOPRC, TCC and WBOPDC.
- The Bell Road catchment is currently serviced by a pumping scheme which indicates that flood risk is an existing issue. This suggests the Bell Road catchment is high risk and a precautionary approach be adopted at this strategic planning step.
- While the location and transport benefits are acknowledged, these would not outweigh the wider issue of providing for urban growth in an overallocated stormwater catchment and resulting costs of resilience if development were to occur in a piece-meal fashion within the catchment.
- UFTI excluded Bell Road and Tara Rd from the Connected Centres settlement pattern.
- Tara Rd is specifically referred to as a potential site at page 149 of the draft FDS along with the other possible sites deemed suitable for industrial land uses. The three yearly review of the SmartGrowth Strategy/FDS required by the NPS-UD allows for any additional potential growth areas to be included in the strategy should these be able to be supported.
- Acknowledgement of the Te Maru o Kaituna River Authority and the inconsistency of large-scale and incremental urban land use change in the surrounding and upstream catchments with the vision and objectives of the Kaituna River Document.
- Consideration of the likely requirements arising from the Proposed National Policy Statement for Natural Hazard Decision Making 2023

Under this option and the others listed, work will continue with the Nga Potiki a Tamapahore Trust.

**Option 7(2)B: Include Area: Identify Tara Rd as a 'Potential long term growth area' in Map 18 of the FDS****Advantages**

- Potentially addresses the housing and business land shortfall
- Provides certainty for the landowners (Nga Potiki a Tamapahore Trust) to then undertake further technical assessment work and seek a private plan change to progress any urban development of Tara Rd through the required rezoning process under the RMA.
- Supports Māori development initiative at Tara Rd.

**Disadvantages**

- While statements of geotechnical and engineering evidence were submitted to the hearing from the Bell Rd Partnership which is within the same catchment, this technical information does not substantiate the suitability of land for urban development to be confirmed and that there will be no impact on the wider catchment.
- Misalignment with LTPs and other partner planning documents

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	<ul style="list-style-type: none"> <li>• Puts pressure on councils in particular to include these areas in their planning documents</li> <li>• Opens the door to developments that do not align with the settlement pattern</li> <li>• Unlikely to meet the definition of 'well-functioning' urban environments in the NPS-UD (ie not resilient to the likely current and future effects of climate change)</li> <li>• The SmartGrowth Industrial Land Study reports identify significant natural hazard issues within the wider area which would need to be addressed to enable consideration of Tara Rd for urban development.</li> <li>• Urban development at Tara Rd may result in downstream water quality and ecology effects on the Kaituna River and surrounding and lower catchment area which has been the benefit of substantial downstream restoration works.</li> </ul>
<b>Financial considerations:</b> Financial implications for the relevant council and infrastructure providers if these areas are brought in	
<b>Other Considerations:</b> See considerations above. <ul style="list-style-type: none"> <li>• The Bell Road Limited Partnership provided further information at the hearings in relation to their submission as statements of evidence from planning, geotechnical and engineering experts. No technical reports were provided from Bell Road Limited Partnership or Nga Potiki a Tamapahore Trust.</li> <li>• Requirements of NPS-UD for sufficient capacity for housing and business land in each district.</li> <li>• It is recognised that there are constraints and opportunities in delivering the potential housing and business land growth areas to the market.</li> <li>• Acknowledge the Te Maru o Kaituna River Authority and inconsistency of large-scale and incremental urban land use change in the surrounding and upstream catchments with the vision and objectives of the Kaituna River Document.</li> <li>• Consideration of the likely requirements arising from the Proposed National Policy Statement for Natural Hazard Decision Making 2023.</li> </ul>	
<b>Option 7(2)C: Include a notation to identify Tara Rd as a potential future growth area if issues are overcome:</b> Make no further changes to the strategy to include the additional area, but include a notation to identify Tara Rd as potential further growth area if specific matters are addressed and overcome (natural hazards).	
<b>Advantages</b> <ul style="list-style-type: none"> <li>• Tara Road is already identified as a possible site for industrial land in the draft FDS at page 149.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>• Lost opportunity cost.</li> </ul>

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<ul style="list-style-type: none"> <li>Partly addresses submitter requests around Tara Rd – provides a pathway provided specific information is provided and constraints are overcome</li> <li>Areas such as Wairākei South and Tara Rd align well with the Connected Centres approach</li> <li>Supports a potential Māori development initiative at Tara Rd</li> <li>SmartGrowth is responsive to development proposals</li> <li>By not amending the settlement pattern, it aligns with initial LTP decisions and other infrastructure planning</li> <li>Maintains sufficient certainty around the FDS settlement pattern</li> <li>Aligns with evidence-based decisions made around the FDS settlement pattern (including those relating to constraints)</li> </ul>	<ul style="list-style-type: none"> <li>Downstream water quality and ecology effects on the Kaituna River and surrounding and lower catchment area which has been the benefit of substantial downstream restoration works.</li> <li>Signals that development could be a possibility in this area where that may not prove to be the case</li> </ul>
<b>Financial considerations</b>	
None	
<b>Other Considerations</b>	
<ul style="list-style-type: none"> <li>Proposed National Policy Statement for Natural Hazard Decision-making 2023</li> <li>Government Policy changes</li> <li>Tara Rd is specifically referred to as a potential site at page 149 of the draft FDS along with the other possible sites deemed suitable for industrial land uses. The three yearly review of the SmartGrowth Strategy/FDS required by the NPS-UD allows for any additional potential growth areas to be included in the strategy should these be able to be supported.</li> <li>Under this option Tara Rd would be identified in some form in the FDS as subject to technical investigations. Future Proof included three possible business land sites in their Strategy on a separate map as subject to further investigation.</li> <li>Acknowledgement of the Te Maru o Kaituna River Authority and the inconsistency of large-scale and incremental urban land use change in the surrounding and upstream catchments with the vision and objectives of the Kaituna River Document.</li> </ul>	
<b>Issue 7(3): Settlement Pattern – Additional Areas: Residential growth in the East</b> <i>Request for immediate residential growth at Paengaroa and Pongakawa. An assessment of Māori land suitable for housing solutions in Maketu and an extension of coastal settlements past Pukehina further east has also been requested to be explored. General requests for development of rural settlements in the East.</i>	
<b>Option 7(3)A: Status Quo – Make no changes to the strategy to include additional residential areas in the East (Recommended).</b> Clarify in Part 4 (page 145) of the Strategy that the FDS relates to urban development: <i>The FDS relates to urban development only and does not consider rural development.</i>	

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<b>Advantages</b> <ul style="list-style-type: none"> <li>Aligns with initial LTP decisions and other infrastructure planning</li> <li>Provides certainty around the FDS settlement pattern</li> <li>Aligns with evidence-based decisions made around the FDS settlement pattern</li> <li>Lowens the risk of 'opening the door' to developments that do not align with the FDS Connected Centres approach, this includes incremental rural residential development</li> <li>Areas at Paengaroa and Pongakawa do not meet the definition of "urban environment" under the NPS UD (must be &gt;10,000 people) for inclusion in the FDS.</li> <li>Aligns with the position of the relevant SmartGrowth partners</li> <li>Provides a clear signal from SmartGrowth that those developments are not part of the FDS</li> <li>Avoids cross over with a separate RMA private plan change process (Private Plan Change 95 – Pencarrow Estate, Pongakawa)</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>SmartGrowth is seen as insufficiently responsive to development requests in the context of a significant housing and business land shortfall</li> </ul>
<b>Financial considerations</b>	
None	
<b>Other Considerations</b>	
Private Plan Change 95 (Pencarrow Estate, Pongakawa) is an active plan change with decisions still to be made. The FDS component of the SmartGrowth Strategy is focussed on urban development as per the requirements of the NPS-UD – not rural residential.	
<b>Option 7(3)B: Include Areas:</b> Change the Settlement Pattern to include the additional areas in the East (adding Paengaroa and Pongakawa)	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Potentially addresses the housing shortfall</li> <li>Provides a pathway for landowners/developers in these areas</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Insufficient work has been completed to justify bringing these areas in which could undermine the evidence-based approach of the strategy</li> <li>Misalignment with LTPs and other partner planning documents</li> <li>Puts pressure on councils in particular to include these areas in their planning documents</li> <li>Cuts across an active private plan change</li> <li>Includes areas that have identified 'no go' and 'go carefully' constraints</li> </ul>

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	<ul style="list-style-type: none"> <li>• Opens the door to developments that do not align with the Connected Centres settlement pattern</li> <li>• Provides support for rural residential development which goes against the more compact approach being advanced in the strategy</li> <li>• Could encourage piece-meal development in locations that are now well connected or serviced</li> <li>• Unlikely to meet the definition of 'well-functioning' urban environments in the NPS-UD and falls outside the NPS-UD urban development focus</li> </ul>
<b>Financial considerations:</b> Financial implications for the relevant council and infrastructure providers if these areas are brought in	
<b>Other Considerations:</b> Private Plan Change 95 (Pencarrow Estate, Pongakawa) is an active plan change with decisions still to be made.	
<b>Option 7(3)C: Refer to Implementation and Funding Plan:</b> Make no changes to the strategy to include the additional areas, but note that further on housing opportunities in eastern villages could be undertaken through the Implementation Plan.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>• Partly addresses submitter requests by signalling that further work on the rural villages could be undertaken through the Implementation Plan</li> <li>• SmartGrowth is responsive to development proposals</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>• Out of step with some of the SmartGrowth partners (WBOPDC have signalled that Te Puke and the new Eastern Centre are their response to growth in the Eastern Corridor)</li> <li>• Signals that development could be a possibility in these areas where that may not be the case</li> <li>• Inconsistent with the SmartGrowth Connected Centres, more compact development, approach</li> <li>• Could encourage piece-meal development in locations that are now well connected or serviced</li> </ul>
<b>Financial considerations</b>	
Could have financial implications on the relevant councils and other infrastructure and service providers depending on the outcome of the further work undertaken.	
<b>Other Considerations</b>	
Private Plan Change 95 (Pencarrow Estate, Pongakawa) is an active plan change with decisions still to be made.	

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<b>Issue 7(4): Settlement Pattern – Additional Areas: Residential growth in Te Puke</b> <i>Request for immediate residential growth in the Te Puke township.</i>	
<b>Option 7(4)A: Status Quo (Recommended)</b> – Make no changes to the strategy to include further development for Te Puke. Note that a spatial plan for Te Puke is underway.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Aligns with initial LTP decisions and other infrastructure planning</li> <li>Provides certainty around the FDS settlement pattern</li> <li>Aligns with evidence-based decisions made around the FDS settlement pattern</li> <li>Aligns with the position of the relevant SmartGrowth partners</li> <li>Ensures alignment with the Te Puke spatial planning process currently underway</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>SmartGrowth is seen as insufficiently responsive to development requests in the context of a significant housing and business land shortfall</li> </ul>
<b>Financial considerations</b>	
None	
<b>Other Considerations</b>	
Note that under Plan Change 92 (Medium Density Residential Standards) significant additional residential development is being enabled for Te Puke. A Spatial Plan for Te Puke is currently being progressed.	
<b>Option 7(4)B: Include Areas:</b> Change the Settlement Pattern to include further growth in the Te Puke township.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Potentially addresses the housing shortfall</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Misalignment with LTPs and other partner planning documents</li> <li>Out of step with the Te Puke Spatial Plan which is currently underway and will investigate appropriate growth locations within Te Puke</li> </ul>
<b>Financial considerations:</b> Financial implications for the relevant council and infrastructure providers if this area is expanded	
<b>Other Considerations:</b> Note that under Plan Change 92 (Medium Density Residential Standards) significant additional residential development is being enabled for Te Puke. A Spatial Plan for Te Puke is currently being progressed.	
<b>Issue 7(5): Settlement Pattern – Additional Areas: Residential growth for Welcome Bay and Upper Ohauiti</b> <i>Request for the Upper Ohauiti area to be identified as a lifestyle area (rural residential development) from LandPlay Ltd.</i>	

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<i>Two submitters have raised the possibility of further development in Welcome Bay in a general sense.</i>	
<b>Option 7(5)A: Status Quo (Recommended)</b> – Make no changes to the strategy to include the additional areas of Welcome Bay and Upper Ohauiti.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Aligns with initial Draft TCC LTP and other infrastructure planning, noting that WBOPDC LTP has been delayed</li> <li>Aligns with the findings of the Welcome Bay and Ohauiti Planning Study 2020</li> <li>Provides certainty around the FDS settlement pattern</li> <li>Aligns with evidence-based decisions made around the FDS settlement pattern (including those relating to constraints)</li> <li>Lowers the risk of ‘opening the door’ to developments that do not align with the FDS Connected Centres approach, this includes rural residential development as proposed for Upper Ohauiti</li> <li>Provides a clear signal from SmartGrowth that those developments are not part of the FDS</li> <li>Protects rural land and avoids further fragmentation.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>SmartGrowth is unresponsive to development requests in the context of a housing shortfall</li> </ul>
<b>Financial considerations</b>	
None	
<b>Other Considerations</b>	
<ul style="list-style-type: none"> <li>Welcome Bay and Ohauiti Planning Study 2020, Tauranga City Council: <a href="https://www.tauranga.govt.nz/our-future/enabling-growth/welcome-bay-and-ohauiti-planning-study">https://www.tauranga.govt.nz/our-future/enabling-growth/welcome-bay-and-ohauiti-planning-study</a>. The Study found that accommodating medium and high growth housing scenarios would be unfeasible, except in the Upper Ohauiti urban growth area (the part that falls within the TCC boundary). This conclusion largely derives from the costs of developing road infrastructure to cope with additional traffic generation. Existing traffic congestion in the Welcome Bay Road area, which includes buses using Welcome Bay Road, would be worsened in the medium and high growth scenarios.</li> <li>UFTI noted Welcome Bay/Ohauiti as a potential opportunity post 30 years but added the proviso that there would only be limited growth due to infrastructure constraints and complex land ownership.</li> <li>Submitters under the Rural Issues and Options paper have raised the importance of protecting rural land.</li> <li>The FDS component of the SmartGrowth Strategy is focussed on urban development (as defined in the NPS-UD) – not rural residential.</li> </ul>	
<b>Option 7(5)B: Include Areas: Change the Settlement Pattern to include the additional areas of Welcome Bay and Upper Ohauiti</b>	

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<p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>• Potentially addresses some of the housing shortfall, noting this will be limited as only small numbers of houses are proposed and it will not provide the housing typology needed</li> <li>• Provides certainty for the landowner to seek a plan change to progress development</li> </ul>	<p><b>Disadvantages</b></p> <ul style="list-style-type: none"> <li>• Contrary to the findings of the Welcome Bay and Ohauiti Planning Study 2020 – with resulting infrastructure and funding implications</li> <li>• There are significant infrastructure servicing constraints. Self-servicing for three waters is proposed for the Upper Ohauiti development.</li> <li>• Puts pressure on councils in particular to include these areas in their planning documents</li> <li>• Opens the door to developments that do not align with the Connected Centres settlement pattern</li> <li>• Provides support for rural residential development which goes against the more compact approach being advanced in the strategy</li> <li>• Unlikely to meet the definition of ‘well-functioning’ urban environments in the NPS-UD</li> <li>• Could compromise longer-term growth options for this area if rural residential is allowed</li> </ul>
<p><b>Financial considerations:</b> Financial implications for the relevant council and infrastructure providers if these areas are brought in</p>	
<p><b>Other Considerations:</b> See above</p>	
<p><b>N/A</b></p>	

**Issue 7(6): Settlement Pattern – Additional Areas: Intensification**

*Submissions which have requested greater levels of intensification than currently allocated.*

*One submitter has questioned the levels of intensification and infill.*

*Concerns raised around PC33.*

**Option 7(6)A: Status Quo (Recommended):** Make no changes to the intensification numbers in the strategy. Add the following statement in Part 4 (FDS) at page 145: *It is the intention of the Strategy to achieve a more compact urban form through the Connected Centres Development Strategy. The aim is to target at least 40% of new development through intensification and infill over time.*

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<b>Advantages</b> <ul style="list-style-type: none"> <li>Aligns with the HBA which provides the evidence base for the SmartGrowth Strategy.</li> <li>Aligns with initial LTP decisions and other infrastructure planning</li> <li>The Strategy already acknowledges there is significant uncertainty on the dwelling allocations for intensification and has included a range for intensification to reflect that.</li> <li>The Strategy is reviewed every 3 years and can be adjusted if greater levels of intensification are achieved.</li> <li>Avoids cross over with a separate RMA plan change process underway through PC33 (noting that this is an uncertain area with the change of Government).</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Lost opportunity to promote a more ambitious target for intensification</li> <li>Not taking full opportunity to meet Emissions Reduction Plan targets and modal shift goals</li> <li>The Strategy may not be clear about the potential impact of PC 33 (noting that this is an uncertain area given the change of Government)</li> </ul>
<b>Financial considerations</b>	
None	
<b>Other Considerations</b>	
<ul style="list-style-type: none"> <li>SmartGrowth aims to achieve close to 40% of development through intensification areas over the 30 year period of the Strategy. This is an increase over current levels and is ambitious having regard to current development feasibility issues.</li> <li>Both PC33 and PC92 allow for a significant increase in intensification and infill development. For Tauranga City there is sufficient planned enabled and serviced capacity for 19,000 homes to be provided through PC33 (known as the reasonably expected to be realised development capacity). However, this estimate relates to all infill and intensification including in greenfield areas. If intensification in the UGAs is also included then that makes the intensification/infill numbers closer to 50% of all development.</li> <li>There are uncertainties for all development and how much will actually be achieved. The SmartGrowth Strategy has built-in flexibility to account for changes. The FDS component of the Strategy is also required to be reviewed every 3 years.</li> <li>There is some uncertainty regarding the new Government's plans for climate change and their approach to the Emissions Reduction Plan, including VKT reduction. Intensification remains an important component of development capacity and meeting climate change goals regardless.</li> <li>Decisions have not yet been released on PC33 and PC92. It is noted that the new Government plans to give councils flexibility make the MDRS provisions voluntary rather than mandatory.</li> </ul>	
<b>Option 7(6)B: Increase Intensification:</b> Allow for greater levels of intensification. Provide greater direction in terms of PC33.	

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<b>Advantages</b> <ul style="list-style-type: none"> <li>• Would allow for an even more compact form of development</li> <li>• Addresses housing shortfalls if the increased levels can be achieved</li> <li>• Helps to meet Emissions Reduction Plan targets and supports modal shift goals.</li> <li>• Strategy is clear about the impact of PC33 and provides direction.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>• There are some significant challenges to be overcome in order to achieve the intensification levels already set in the Strategy.</li> <li>• Increasing the dwellings allocated to intensification areas further could have implications for other growth areas and the ability to adequately plan for growth.</li> <li>• Could raise expectations around how much intensification can be achieved.</li> <li>• Infrastructure not necessarily in place or planned to allow for significant increases in intensification.</li> <li>• Cross over with the PC33 process and potential interference with a matter that is subject to a decision still to be made.</li> </ul>
<b>Financial considerations:</b> Financial implications for the relevant council and infrastructure providers if intensification is increased further	
<b>Other Considerations:</b> See above	

**Issue 7(7): Settlement Pattern – Staging of Long term Development in the Eastern Corridor and Western Corridor**

*Clarify the timing and status of the Eastern Centre and whether the full Western Corridor SDP area and the Eastern Centre would be needed within the 30-year timeframe. Request for clarity over the staging or relative priority of growth in the corridors.*

*Support for Upper Belk as a growth area from Element IMF Ltd.*

*Property Council concerned that insufficient work has been done on the Eastern Corridor.*

*Ministry of Education has submitted that the draft Strategy needs to be clearer about the status of the Eastern Centre, particularly if the Tauranga Western Corridor SDP is confirmed. The Ministry has requested that SmartGrowth clarify the timing and status of the longer term growth areas and clarify whether both the full Tauranga Western Corridor SDP area (including the potential growth areas) and the Eastern Centre would be needed within the 30-year timeframe. They have also requested staging or relative priority of growth in the corridors but have noted this could form part of the Implementation and Funding Plan.*

*The Urban Taskforce has requested that the SmartGrowth Partners need to ensure and adopt a much more flexible approach to ensuring there is future land supply available to provide for the growth needs of Tauranga.*

**Option 7(7)A: Status Quo: Make no changes to the strategy to clarify the timing and status of the Eastern Centre and Western Corridor.**

<p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>Aligns with the HBA which provides the evidence base for the SmartGrowth Strategy.</li> <li>Allows flexibility over which area (Eastern Centre or Western Corridor) is developed first in the long term depending on demand, infrastructure readiness and other factors.</li> <li>The Strategy already acknowledges there is a lot of uncertainty around the dwelling allocations.</li> <li>There has not been sufficient work completed yet to include substantive detail on either of the longer term growth areas. The approach taken in the Strategy allows for that work to be undertaken over the next few years and then included in the Strategy at a later date.</li> <li>Avoids having to prioritise the longer term growth areas when there is insufficient information to make this decision</li> <li>The FDS component of the Strategy is reviewed every 3 years and can be adjusted at that time.</li> </ul>	<p><b>Disadvantages</b></p> <ul style="list-style-type: none"> <li>A lack of clarity over which areas (including how much) will be needed over the next 30 years</li> <li>The dwelling tables indicate a housing shortfall so at present there is not enough housing identified to meet demand. This is contrary to the NPS-UD which requires the FDS to provide at least sufficient development capacity over the next 30 years to meet expected demand.<sup>6</sup></li> <li>Lack of certainty for infrastructure providers and developers.</li> </ul>
<p><b>Financial considerations</b></p>	
<p>None</p>	
<p><b>Other Considerations</b></p>	
<p>Eastern Centre business case – this is currently underway and close to completion. The Eastern Centre is identified as a SmartGrowth Priority Development Area.</p>	
<p>Western Corridor Specified Development Project (SDP) Assessment <sup>7</sup> – this is a Kāinga Ora led project which is currently underway.</p>	
<p><b>Option 7(7)B: Provide Greater Clarity around Longer Term Areas (Recommended):</b> Amend the residential allocation table to acknowledge that both the Eastern Centre and Western Corridor (Upper Belk Road) may be needed within the 30 year timeframe. Add a range of 1,000 – 4,000 houses into the long-term residential allocation column for the Eastern Centre and Upper Belk Road. Add a clear notation to the residential allocation table and on Map 18 that the timing for these areas is still subject to investigation. Amend maps to include Upper Belk as a Long-Term growth area. Be clear that Upper Belk Road is the next location for growth in the Western Corridor following Tauriko West and Keenan Rd. This is supported by the Industrial IOP which identifies Upper Belk as an area for business land in the long-term, and the supporting industrial land studies.</p>	

<sup>6</sup> Clause 3.13(1)(a)(ii), National Policy Statement on Urban Development 2020 (May 2022)

<sup>7</sup> <https://specified-development-projects-kaingaora.hub.arcgis.com/pages/western-corridor>

Clarify the terminology around 'potential long-term growth area' and 'long-term growth areas' – ensure the maps align with these terms.  
Add the following footnote to Map 18: *Further work is required to determine staging, spatial extent and mix of land uses for the Eastern Centre and Western Corridor (Upper Belk Road).*

Recommend that the Western Corridor be added as a Priority Development Area.

#### Advantages

- Provides a greater level of certainty around where longer-term development will occur next.
- Adding Upper Belk into the allocation table and providing a range for both Upper Belk Road and the Eastern Centre will mean there is sufficient housing provided to meet demand over the 30 year period, while acknowledging the uncertainties.
- Balances with the industrial land provision in the Western Corridor and aligns with the findings of the Industrial Land studies.
- Keeps development options open and allows significant decisions to be taken at a later stage once further investigations have been completed.

#### Disadvantages

- The Strategy will still be promoting significant growth in two large areas within a similar timeframe.
- There is still no clear priority between the Eastern or Western Corridor.

**Financial considerations:** Councils and infrastructure providers will need to continue to ensure there is infrastructure funding to support these areas.

#### Other Considerations:

Eastern Centre business case – this is currently underway and close to completion. The Eastern Centre is identified as a SmartGrowth Priority Development Area.

Western Corridor Specified Development Project (SDP) Assessment<sup>8</sup> – this is a Kāinga Ora led project which is currently underway.

The Belk Rd Plateau area has been identified in TCC's 30 year Infrastructure Strategy.

The Upper Belk area is within Western Bay of Plenty District.

The SmartGrowth Strategy 2013 identified both of these areas as 'land not currently identified in Settlement Pattern, but subject to Strategic Investigation'.

The Proposed FDS 2018 included the Eastern Corridor and Western Corridor as 'Investigation for Possible Urban Growth Areas'.

UFTI identified both areas as 'Envisioned Growth Areas – 30 Years +'.

The Western Corridor Strategic Study in 2016 identified Upper Belk as a location for possible urbanisation should growth demand continue strongly.

See also Urban Form and Centres Background Paper which covers the work behind the long-term growth areas.<sup>9</sup>

<sup>8</sup> <https://specified-development-projects-kaingaora.hub.arcgis.com/pages/western-corridor>

<sup>9</sup> [https://assets.website-files.com/639c0b75c31ac6442f8d9994/6500fbcbbdd0554259e3bf98\\_Urban%20Form%20and%20Centres%20Background%20Paper%20-%20FINAL.pdf](https://assets.website-files.com/639c0b75c31ac6442f8d9994/6500fbcbbdd0554259e3bf98_Urban%20Form%20and%20Centres%20Background%20Paper%20-%20FINAL.pdf)

<b>Option 7(7)C: Remove Wider Western Corridor and Eastern Centre from Map 18:</b> Remove the Wider Western Corridor and Eastern Centre from the 30 year FDS map (Map18) and display as longer term (30 years +) only	
<b>Advantages</b> <ul style="list-style-type: none"> <li>• Less confusing by not including the two longer term areas</li> <li>• Areas have no specific commitment to infrastructure in the LTP</li> <li>• Text reflects that these areas may need to be brought forward</li> <li>• No expectations around which of these longer term areas will occur in the next 30 years</li> <li>• Allows further detail to be added once investigations have been completed</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>• Lack of certainty over longer term development</li> <li>• Doesn't meet the NPS-UD requirements to provide sufficient capacity over the next 30 years</li> </ul>
<b>Financial considerations:</b> None	
<b>Other Considerations:</b> Eastern Centre business case – this is currently underway and close to completion. The Eastern Centre is identified as a SmartGrowth Priority Development Area. Western Corridor Specified Development Project (SDP) Assessment <sup>10</sup> – this is a Kāinga Ora led project which is currently underway.	

**Issue 8: Te Puna**

*Request for an 'off limit' layer for Te Puna and Huharua involving Whakamarama.*

*Requests that Te Puna be further investigated for development.*

**Option 8A: Status Quo (Recommended):** Make no changes to the strategy. Note that Te Puna is not identified as a longer-term growth area in the FDS, however it is identified as a 'potential long-term growth area' on other maps. Refer submitters to the further work that WBOPDC are planning for Te Puna. Ensure that the spatial extent of Te Puna shown in the SmartGrowth maps aligns with the area WBOPDC are proposing to prepare the spatial plan for. Clarify the terminology around 'potential long-term growth area' and long-term growth areas.

<sup>10</sup> <https://specified-development-projects-kaingaora.hub.arcgis.com/pages/western-corridor>

<b>Advantages</b> <ul style="list-style-type: none"> <li>• Maintains the current settlement pattern as outlined in the FDS section.</li> <li>• Does not introduce changes at this stage of the process which may require further work.</li> <li>• Allows WBOPDC to determine their own approach for Te Puna in due course.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>• A lack of clarity in the strategy over whether Te Puna should be a long-term growth area or should be left undeveloped.</li> </ul>
<b>Financial implications</b>	
N/A	
<b>Other considerations</b>	
<p>Potential WBOPDC spatial plan for Te Puna.</p> <p>Note that Te Puna was identified as a potential growth area for investigation in the SmartGrowth Strategy 2013 and in UFTI, however there were earlier SmartGrowth decisions that development should be directed away from this area.</p> <p>Implementation and Funding Plan could signal that further work needs to be undertaken on Te Puna.</p>	
<b>Option 8B: Remove Te Puna:</b> Remove Te Puna as a 'potential long-term' growth area in the strategy.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>• Sends a clear signal from a sub-regional strategy that Te Puna should be protected, consistent with earlier SmartGrowth decisions to direct urban development away from Te Awanui/Tauranga Harbour due to impacts on natural resources and cultural values.</li> <li>• Provides clarity and certainty.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>• There are a number of viewpoints on whether Te Puna should be developed or not. Insufficient work has been done to determine an approach.</li> <li>• Cuts across any approach that WBOPDC might take with the Te Puna spatial plan.</li> <li>• Moves away from the approach outlined in UFTI without sufficient discussion among the SmartGrowth partners on what the implications of this are.</li> </ul>
<b>Financial implications</b>	
N/A	
<b>Other considerations</b>	
<p>WBOPDC proposed Spatial Plan for Te Puna.</p> <p>Note that Te Puna was identified as a potential growth area for investigation in the SmartGrowth Strategy 2013 and in UFTI, however there were earlier SmartGrowth decisions that development should be directed away from this area.</p>	

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**Issue 9: FDS Implementation**

*Request for a Project Plan and Resourcing Plan to deliver the FDS.*

*Request for clarity on how 'unanticipated' or 'out of sequence' development will be dealt with.*

*Greater clarify on geographic extent of FDS and which areas are in or out, eg rural villages in the East, Welcome Bay/Kairua.*

*Requests that SmartGrowth partners should support implementation of the settlement pattern.*

*Several submitters have requested that the SmartGrowth Strategy adopt a more enabling and fluid policy position. Key actions are required such as the ability to efficiently deliver and service land with respect to infrastructure. Feasibility assessments are required. The "lead time to Development" identified on page 144 of the Strategy needs actions included in the Strategy to support a reduction in the development timeframes.*

**Option 9A: Status Quo (Recommended):** Make only minor changes to the strategy and refer other matters to the Implementation and Funding Plan. This includes putting Map 19 (Western Bay of Plenty Housing) into the Implementation and Funding Plan rather than the FDS section of the Strategy. Add the following text to Part 4 (FDS) to clarify effect of SmartGrowth and the FDS: *Local authorities must have regard to the FDS when preparing or changing RMA planning documents; and is strongly encouraged to use the relevant FDS to inform long-term plans, and particularly infrastructure strategies; regional land transport plans and any other relevant strategies and plans.*

**Advantages**

- Allows for further work to be done through the Implementation and Funding Plan and time to consider these matters further
- Change 6 to the RPS provides the policy approach for 'unanticipated' and 'out of sequence' developments – avoids duplication or misalignment.
- A number of matters raised are of detail that is best dealt with through other processes and not in the strategy itself (eg agreements to support the settlement pattern, feasibility assessments etc).
- The NPS UD has a specific requirement for an FDS "Implementation Plan" that sits outside the FDS, providing greater flexibility for delivery to respond to changes in the operating environment.
- Moving the detailed housing map (Map 19) into the Implementation and Funding Plan allows for this to be updated on a regular basis.

**Disadvantages**

- Lack of clarity on how the strategy will address some of these matters through implementation
- Limited direction in the strategy itself on how 'unanticipated' or 'out of sequence' development requests will be dealt with.

**Financial implications N/A****Other considerations**

Submitters have raised the need for several corrections to Map 19 (Western Bay of Plenty Housing). This has highlighted the issue of this map becoming out of date very quickly. Submitters under this issue have also raised the need for flexibility and being agile. Moving Map 19 into the Implementation and Funding Plan would assist with this.

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<b>Option 9B: Make changes to the strategy:</b> Include detail around what is likely to be in the implementation and funding plan and more information on how 'unanticipated' or 'out of sequence' development requests will be dealt with.	
<b>Advantages</b> <ul style="list-style-type: none"><li>• Provides greater clarity over how matters will be addressed in the Implementation and Funding Plan</li><li>• Provides clear direction on how 'unanticipated' or 'out of sequence' development requests will be dealt with.</li></ul>	<b>Disadvantages</b> <ul style="list-style-type: none"><li>• Could commit the partners to a course of action in the Implementation and Funding Plan that is still to be worked through and decided</li><li>• Duplication or misalignment with Change 6 to the RPS</li><li>• Cumbersome processes for making changes to implementation and delivery plans.</li></ul>
<b>Financial implications N/A</b>	
<b>Other considerations N/A</b>	

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Recommended Decisions
Issue 2: Infrastructure Readiness
<p><b>Option 2B: Make small changes to infrastructure information in the Strategy:</b> Note that the strategy contains a number of directives around infrastructure being put in place to support development.</p> <p>Direct some of the requests contained in the submissions to the Implementation and Funding Plan or to other processes (eg PC33 as a separate statutory process).</p> <p>Make changes to include reference to NPS-ET in the 'Requirements' diagram on page 47 and refer to background papers and other information.</p>
Issue 5: Population Assumptions
<p><b>Option 5A: Status Quo – no change to demographics:</b> Note the submissions and make only minor changes to the Strategy. Provide clarity on areas where concerns have been raised. Note that further work on demographics, including disaggregating more general demographic change information, will be undertaken through the implementation phase. This will feed into specific programmes (eg housing and transport). Acknowledge the work that is underway in terms of infrastructure and service provision that is suitable and accessible for all abilities. Refer other matters such as Māori Housing to the Implementation and Funding Plan. Refer concerns over PC33 to that process.</p>
Issue 6(1): Settlement Pattern – Timing: Te Tumu
<p><b>Option 6(1)C: Acknowledge ability to move areas forward:</b> No changes to the staging as set out in the Strategy but specific text to acknowledge that should infrastructure funding and other matters be addressed there is the potential for areas to be brought forward. Be clear that Te Tumu is still a high priority growth area. Add text to Part 4 (FDS), 'Residential Growth Allocations for the next 30 years' (page 146) as follows: <i>There is the ability for the staging of growth areas to change. In particular, certain growth areas may be brought forward in time provided infrastructure funding or other matters are addressed.</i> Add the following footnote to Te Tumu in the Residential Growth Allocations table: <i>Te Tumu remains a high priority growth area for the SmartGrowth Strategy. The timing of this area may be brought forward if infrastructure funding and other matters are addressed. SmartGrowth and the relevant councils will continue to work with the Te Tumu landowners on progressing this growth area.</i></p>
Issue 6(2): Settlement Pattern – Timing: Tauriko West
<p><b>Option 6(2)C: Acknowledge ability to move areas forward:</b> No changes to the staging as set out in the Strategy but specific text to acknowledge that should infrastructure funding and other matters be addressed there is the potential for areas to be brought forward.</p>

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<b>Issue 6(3): Settlement Pattern – Timing: Keenan Rd</b>
<b>Option 6(3)C: Acknowledge ability to move areas forward:</b> No changes to the staging as set out in the Strategy but specific text to acknowledge that should infrastructure funding and other matters be addressed there is the potential for areas to be brought forward.
<b>Issue 7(1): Settlement Pattern – Additional Areas: Wairākei South</b>
<b>Option 7(1)A: Status Quo – Do not identify Wairākei South as a potential long term growth area for residential and/or business land in the current FDS.</b> Make no changes to the strategy to include the additional area. Defer the consideration of Wairākei South for urban development and in the first instance, to consider catchment management options to manage natural hazard risk and ecology and water quality effects in the wider catchment including the Kaituna River.
<b>Issue 7(2): Settlement Pattern – Additional Areas: Tara Rd</b>
<b>Option 7(2)A: Status Quo – Do not identify Tara Rd as a potential long term growth area for residential and/or business land in the current FDS.</b> Make no changes to the strategy to include the additional area. Defer the consideration of Tara Rd for urban development and in the first instance, to consider catchment management options to manage natural hazard risk and ecology and water quality effects in the wider catchment including the Kaituna River.
<b>Issue 7(3): Settlement Pattern – Additional Areas: Residential Growth in the East</b>
<b>Option 7(3)A: Status Quo –</b> Make no changes to include additional residential areas in the East
<b>Issue 7(4): Settlement Pattern – Additional Areas: Residential Growth in Te Puke</b>
<b>Option 7(4)A: Status Quo –</b> Make no changes to include further development for Te Puke. Note that a spatial plan for Te Puke is underway.
<b>Issue 7(5): Settlement Pattern – Additional Areas: Residential growth for Welcome Bay and Upper Ohauti</b>
<b>Option 7(5)A: Status Quo –</b> Make no changes to the strategy to include the additional areas.
<b>Issue 7(6): Settlement Pattern – Additional Areas: Intensification</b>
<b>Option 7(6)A: Status Quo – no changes to the intensification numbers in the Strategy</b> Make no changes to the intensification numbers in the strategy. Add the following statement in Part 4 (FDS) at page 145: <i>It is the intention of the Strategy to achieve a more compact urban form through the Connected</i>

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Centres Development Strategy. The aim is to target at least 40% of new development through intensification and infill over time.
<b>Issue 7(7): Settlement Pattern – Staging of Long term Development in the Eastern Corridor and Western Corridor</b>
<p><b>Option 7(7)B: Provide Greater Clarity around Longer Term Areas (Recommended):</b></p> <p>Amend the residential allocation table to acknowledge that both the Eastern Centre and Western Corridor (Upper Belk) may be needed within the 30 year timeframe. Add a range of 1,000 – 4,000 houses into the long-term residential allocation column for the Eastern Centre and Upper Belk. Add a clear notation to the residential allocation table and on Map 18 that the timing for these areas is still subject to investigation. Amend maps to include Upper Belk as a Long-Term growth area. Be clear that Upper Belk is the next location for growth in the Western Corridor following Tauriko West and Keenan Rd. This is supported by the Industrial IOP which identifies Upper Belk as an area for business land in the long-term, and the supporting industrial land studies.</p> <p>Clarify the terminology around ‘potential long-term growth area’ and ‘long-term growth areas’ – ensure the maps align with these terms.</p> <p>Add the following footnote to Map 18: <i>Further work is required to determine staging, spatial extent and mix of land uses for the Eastern Centre and Upper Belk.</i></p> <p>Recommend that the Western Corridor be added as a Priority Development Area.</p>
<b>Issue 8: Te Puna and Surrounds</b>
<p><b>Option 8A: Status Quo – no changes regarding Te Puna in the Strategy:</b></p> <p>Make no changes to the strategy. Note that Te Puna is not identified as a longer-term growth area in the FDS, however it is identified as a ‘potential long-term growth area’ on other maps. Refer submitters to the further work that WBOPDC are planning for Te Puna. Ensure that the spatial extent of Te Puna shown in the SmartGrowth maps aligns with the area WBOPDC are proposing to prepare the spatial plan for. Clarify the terminology around ‘potential long-term growth area’ and long-term growth areas.</p>
<b>Issue 9: FDS Implementation</b>
<p><b>Option 9A: Status Quo – only minor changes to the Strategy and refer other matters to the implementation and funding plan:</b> Make only minor changes to the strategy and refer other matters to the Implementation and Funding Plan. This includes putting Map 19 (Western Bay of Plenty Housing) into the Implementation and Funding Plan rather than the FDS section of the Strategy. Add the following text to Part 4 (FDS) to clarify effect of SmartGrowth and the FDS: <i>Local authorities must have regard to the FDS when preparing or changing RMA planning documents; and is strongly encouraged to use the relevant FDS to inform long-term plans, and particularly infrastructure strategies; regional land transport plans and any other relevant strategies and plans.</i></p>
<b>Decision – Issue 2: Infrastructure Readiness</b>
<b>Option 2B: Make small changes to infrastructure information in the Strategy</b>

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<p>Note that the strategy contains a number of directives around infrastructure being put in place to support development. Direct some of the requests contained in the submissions to the Implementation and Funding Plan or to other processes (eg PC33 as a separate statutory process).</p> <p>Make changes to include reference to NPS-ET in the 'Requirements' diagram on page 47 and refer to background papers and other information.</p>
<p><b>Reason</b></p> <ul style="list-style-type: none"> <li>• Addresses some of the points raised by submitters and provides a pathway for dealing with key matters (eg the infrastructure staging map could be addressed in the Implementation and Funding Plan).</li> <li>• Directs certain matters to the correct process (eg PC33)</li> <li>• Addresses specific matters such as the Trnaspower submission points</li> <li>• Provides confidence that the strategy has considered key infrastructure matters.</li> </ul>
<p><b>Decision – Issue 5: Population Assumptions</b></p>
<p><b>Option 5A: Status Quo – no changes to demographics:</b></p> <p>Note the submissions and make only minor changes to the Strategy. Provide clarity on areas where concerns have been raised. Note that further work on demographics, including disaggregating more general demographic change information, will be undertaken through the implementation phase. This will feed into specific programmes (eg housing and transport). Acknowledge the work that is underway in terms of infrastructure and service provision that is suitable and accessible for all abilities. Refer other matters such as Māori Housing to the Implementation and Funding Plan.</p> <p>Refer concerns over PC33 to that process.</p>
<p><b>Reason</b></p>
<p><b>Demographics</b></p> <ul style="list-style-type: none"> <li>• The current strategy does outline the demographic changes with a particular focus on the ageing population, ethnicities and the youthful Māori population (Part 1 – sub-regional context). The requests being made by submissions is to translate this into outcomes and actions. This is something that is best dealt with at a local level (eg through local spatial plans, through the Implementation and Funding Plan and through the Housing System Plan). The advantage of not making these changes is that it keeps the SmartGrowth Strategy at the right level and leaves implementation of specific areas to other mechanisms.</li> </ul>
<p><b>Projections</b></p>

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- The SmartGrowth Strategy projections are evidenced based. Not making changes ensures that the Strategy remains robust and supported by factual information. The matter of rural housing and intensification/infill has been addressed in the SmartGrowth Housing & Business Capacity Assessment 2022. The Strategy does provide a range for intensification and infill given that there are significant uncertainties.

**PC33**

- Avoids cross over with a separate RMA plan change process (noting that this is an uncertain area with the change of Government).

**Implementation Plan for Māori Housing**

- Allows for further work to be done through the Implementation and Funding Plan and time to consider these matters further

**Flexibility**

- Retains the current SmartGrowth Strategy approach for the FDS and avoids introducing too much uncertainty while acknowledging that a responsive approach can be taken (eg through Plan Change 6 to the RPS and future reviews of the FDS).

**Decision – Issue 6(1): Settlement Pattern – Timing: Te Tumu****Option 6(1)C: Acknowledge ability to move areas forward (recommended):**

No changes to the staging as set out in the Strategy but specific text to acknowledge that should infrastructure funding and other matters be addressed there is the potential for areas to be brought forward. Be clear that Te Tumu is still a high priority growth area. Add text to Part 4 (FDS), 'Residential Growth Allocations for the next 30 years' (page 146) as follows: *There is the ability for the staging of growth areas to change. In particular, certain growth areas may be brought forward in time provided infrastructure funding or other matters are addressed.* Add the following footnote to Te Tumu in the Residential Growth Allocations table: *Te Tumu remains a high priority growth area for the SmartGrowth Strategy. The timing of this area may be brought forward if infrastructure funding and other matters are addressed. SmartGrowth and the relevant councils will continue to work with the Te Tumu landowners on progressing this growth area.*

**Reason**

- Partly addresses submitters concerns.
- Acknowledges that Te Tumu is an important growth area for the strategy given its scale and location
- Provides flexibility should infrastructure funding matters be resolved
- Aligns with initial TCC decisions around LTP – noting that there is further information to come in this regard prior to deliberations

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<ul style="list-style-type: none"> <li>Allows for further work to be done through the Implementation Plan and time to consider these matters further</li> </ul>
<b>Decision – Issue 6(2): Settlement Pattern – Timing: Tauriko West</b>
<p><b>Option 6(2)C: Acknowledge ability to move areas forward:</b></p> <p>No changes to the staging as set out in the Strategy but specific text to acknowledge that should infrastructure funding and other matters be addressed there is the potential for areas to be brought forward.</p>
<b>Reason</b>
<ul style="list-style-type: none"> <li>Partly addresses submitters concerns.</li> <li>Provides flexibility should infrastructure funding matters be resolved</li> <li>Aligns with initial TCC decisions around Draft LTP</li> <li>Allows for further work to be done through the Implementation Plan and time to consider these matters further</li> </ul>
<b>Decision – Issue 6(3): Settlement Pattern – Timing: Keenan Rd</b>
<p><b>Option 6(3)C: Acknowledge ability to move areas forward:</b></p> <p>No changes to the staging as set out in the Strategy but specific text to acknowledge that should infrastructure funding and other matters be addressed there is the potential for areas to be brought forward.</p>
<b>Reason</b>
<ul style="list-style-type: none"> <li>Partly addresses submitters concerns.</li> <li>Acknowledges that Keenan Rd is an important growth area for the strategy</li> <li>Provides flexibility should infrastructure funding matters be resolved</li> <li>Aligns with initial TCC decisions around Draft LTP</li> <li>Allows for further work to be done through the Implementation Plan and time to consider these matters further</li> </ul>
<b>Decision – Issue 7(1): Settlement Pattern – Additional Areas: Wairākei South</b>
<p><b>Option 7(1)A: Status Quo – Do not identify Wairākei South as a potential long term growth area for residential and/or business land in the current FDS.</b> Make no changes to the strategy to include the additional area. Defer the consideration of Wairākei South for urban development and in the first instance, to consider catchment management options to manage natural hazard risk and ecology and water quality effects in the wider catchment including the Kaituna River.</p>
<b>Reason</b>
<ul style="list-style-type: none"> <li>Aligns with evidence-based decisions made around the FDS settlement pattern (including those relating to constraints)</li> <li>Identifies that a catchment level approach is required to manage flood risk in the Bell Road catchment.</li> </ul>

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<ul style="list-style-type: none"> <li>• Maintains the SmartGrowth position that supports a 'Go Carefully' approach to this area.</li> <li>• Aligns with initial LTP decisions and other infrastructure planning (ie these areas have not been accounted for in LTPs)</li> <li>• Lowers the risk of 'opening the door' to developments that may not be viable due to natural hazard constraints</li> <li>• Aligns with the position of the relevant SmartGrowth partners</li> <li>• Provides a potential pathway to the submitter for future consideration of the proposed Wairākei South urban growth area.</li> <li>• Under this option consideration of Wairākei South for urban development would be deferred to the next FDS review in three years to enable catchment management options to manage natural hazard risk in the wider catchment and surrounding area to be evaluated.</li> </ul>
<b>Decision – Issue 7(2): Settlement Pattern – Additional Areas: Tara Rd</b>
<p><b>Option 7(2)A: Status Quo – Do not identify Tara Rd as a potential long term growth area for residential and/or business land in the current FDS.</b></p> <p>Make no changes to the strategy to include the additional area. Defer the consideration of Tara Rd for urban development and in the first instance, to consider catchment management options to manage natural hazard risk and ecology and water quality effects in the wider catchment including the Kaituna River.</p>
<b>Reason</b>
<ul style="list-style-type: none"> <li>• Aligns with evidence-based decisions made around the FDS settlement pattern (including those relating to constraints)</li> <li>• Identifies that a catchment level approach is required to manage flood risk.</li> <li>• Maintains the SmartGrowth position that supports a 'Go Carefully' approach to this area.</li> <li>• Aligns with initial LTP decisions and other infrastructure planning (ie these areas have not been accounted for in LTPs)</li> <li>• Lowers the risk of 'opening the door' to developments that may not be viable due to natural hazard constraints</li> <li>• Aligns with the position of the relevant SmartGrowth partners</li> <li>• Provides a potential pathway to the submitter for future consideration of Tara Rd as an urban growth area.</li> <li>• Under this option consideration of Tara Rd for urban development would be deferred to the next FDS review in three years to enable catchment management options to manage natural hazard risk in the wider catchment and surrounding area to be evaluated.</li> </ul>
<b>Decision – Issue 7(3) Settlement Pattern – Additional Areas: Residential growth in the East</b>

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<p><b>Option 7(3)A: Status Quo – make no changes to include additional residential areas in the East:</b> Make no changes to the strategy to include the additional areas. Clarify in Part 4 (page 145) of the Strategy that the FDS relates to urban development: <i>The FDS relates to urban development only and does not consider rural development.</i></p>
<p><b>Reason</b></p> <ul style="list-style-type: none"> <li>Aligns with initial LTP decisions and other infrastructure planning</li> <li>Provides certainty around the FDS settlement pattern</li> <li>Aligns with evidence-based decisions made around the FDS settlement pattern</li> <li>Lowens the risk of ‘opening the door’ to developments that do not align with the FDS Connected Centres approach, this includes incremental rural residential development</li> <li>Areas at Paengaroa and Pongakawa do not meet the definition of “urban environment” under the NPS UD (must be &gt;10,000 people) for inclusion in the FDS.</li> <li>Aligns with the position of the relevant SmartGrowth partners</li> <li>Provides a clear signal from SmartGrowth that those developments are not part of the FDS</li> <li>Avoids cross over with a separate RMA private plan change process (Private Plan Change 95 – Pencarrow Estate, Pongakawa)</li> </ul>
<p><b>Decision – Issue 7(4) Settlement Pattern – Additional Areas: Residential growth in Te Puke</b></p>
<p><b>Option 7(4)A: Status Quo – Make no changes to the strategy to include further development for Te Puke. Note that a spatial plan for Te Puke is underway.</b></p>
<p><b>Reason</b></p> <ul style="list-style-type: none"> <li>Aligns with initial LTP decisions and other infrastructure planning</li> <li>Provides certainty around the FDS settlement pattern</li> <li>Aligns with evidence-based decisions made around the FDS settlement pattern</li> <li>Aligns with the position of the relevant SmartGrowth partners</li> <li>Ensures alignment with the Te Puke spatial planning process currently underway</li> </ul>
<p><b>Decision – Issue 7(5) Settlement Pattern – Additional Areas: Residential growth for Welcome Bay and Upper Ohauiti</b></p>
<p><b>Option 7(5)A: Status Quo – no changes to include Welcome Bay and Upper Ohauiti</b></p>
<p><b>Reason</b></p> <ul style="list-style-type: none"> <li>Aligns with initial Draft TCC LTP and other infrastructure planning, noting that WBOPDC LTP has been delayed</li> </ul>

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<ul style="list-style-type: none"> <li>Aligns with the findings of the Welcome Bay and Ohauiti Planning Study 2020</li> <li>Provides certainty around the FDS settlement pattern</li> <li>Aligns with evidence-based decisions made around the FDS settlement pattern (including those relating to constraints)</li> <li>Lowers the risk of 'opening the door' to developments that do not align with the FDS Connected Centres approach, this includes rural residential development as proposed for Upper Ohauiti</li> <li>Provides a clear signal from SmartGrowth that those developments are not part of the FDS</li> <li>Protects rural land and avoids further fragmentation.</li> </ul>
<b>Decision – Issue 7(6) Settlement Pattern – Additional Areas: Intensification</b>
<p><b>Option 7(6)A: Status Quo – no changes to the intensification numbers in the Strategy (recommended):</b></p> <p>Make no changes to the intensification numbers in the strategy. Add the following statement in Part 4 (FDS) at page 145: <i>It is the intention of the Strategy to achieve a more compact urban form through the Connected Centres Development Strategy. The aim is to target at least 40% of new development through intensification and infill over time.</i></p>
<b>Reason</b>
<ul style="list-style-type: none"> <li>Aligns with the HBA which provides the evidence base for the SmartGrowth Strategy.</li> <li>Aligns with initial LTP decisions and other infrastructure planning</li> <li>The Strategy already acknowledges there is significant uncertainty on the dwelling allocations for intensification and has included a range for intensification to reflect that.</li> <li>The Strategy is reviewed every 3 years and can be adjusted if greater levels of intensification are achieved.</li> <li>Avoids cross over with a separate RMA plan change process underway through PC33 (noting that this is an uncertain area with the change of Government).</li> </ul>
<b>Decision – Issue 7(7) Settlement Pattern – Staging of Long term Development in the Eastern Corridor and Western Corridor</b>
<p><b>Option 7(7)B: Provide Greater Clarity around Longer Term Areas (Recommended):</b> Amend the residential allocation table to acknowledge that both the Eastern Centre and Western Corridor (Upper Belk Road) may be needed within the 30 year timeframe. Add a range of 1,000 – 4,000 houses into the long-term residential allocation column for the Eastern Centre and Upper Belk Road. Add a clear notation to the residential allocation table and on Map 18 that the timing for these areas is still subject to investigation. Amend maps to include Upper Belk Road as a Long-Term growth area. Be clear that Upper Belk Road is the</p>

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<p>next location for growth in the Western Corridor following Tauriko West and Keenan Rd. This is supported by the Industrial IOP which identifies Upper Belk Road as an area for business land in the long-term, and the supporting industrial land studies.</p> <p>Clarify the terminology around 'potential long-term growth area' and 'long-term growth areas' – ensure the maps align with these terms.</p> <p>Add the following footnote to Map 18: <i>Further work is required to determine staging, spatial extent and mix of land uses for the Eastern Centre and Western Corridor (Upper Belk Road)</i></p> <p>Recommend that the Western Corridor be added as a Priority Development Area.</p>
<p><b>Reason</b></p> <ul style="list-style-type: none"> <li>• Provides a greater level of certainty around where longer-term development will occur next.</li> <li>• Adding Upper Belk into the allocation table and providing a range for both Upper Belk and the Eastern Centre will mean there is sufficient housing provided to meet demand over the 30 year period, while acknowledging the uncertainties.</li> <li>• Balances with the industrial land provision in the Western Corridor and aligns with the findings of the Industrial Land studies.</li> <li>• Keeps development options open and allows significant decisions to be taken at a later stage once further investigations have been completed.</li> </ul>
<p><b>Decision – Issue 8: Te Puna</b></p> <p><b>Option 8A: Status Quo: Make no changes to the strategy.</b> Note that Te Puna is not identified as a longer-term growth area in the FDS, however it is identified as a 'potential long-term growth area' on other maps. Refer submitters to the further work that WBOPDC are planning for Te Puna. Ensure that the spatial extent of Te Puna shown in the SmartGrowth maps aligns with the area WBOPDC are proposing to prepare the spatial plan for. Clarify the terminology around 'potential long-term growth area' and long-term growth areas.</p>
<p><b>Reason</b></p> <ul style="list-style-type: none"> <li>• Maintains the current settlement pattern as outlined in the FDS section.</li> <li>• Does not introduce changes at this stage of the process which may require further work.</li> <li>• Allows WBOPDC to determine their own approach for Te Puna in due course.</li> </ul>
<p><b>Decision – Issue 9: FDS Implementation</b></p> <p><b>Option 9A: Status Quo:</b> Make only minor changes to the strategy and refer other matters to the Implementation and Funding Plan. This includes putting Map 19 (Western Bay of Plenty Housing) into the Implementation and Funding Plan rather than the FDS section of the Strategy. Add the</p>

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following text to Part 4 (FDS) to clarify effect of SmartGrowth and the FDS: *Local authorities must have regard to the FDS when preparing or changing RMA planning documents; and is strongly encouraged to use the relevant FDS to inform long-term plans, and particularly infrastructure strategies; regional land transport plans and any other relevant strategies and plans.*

Reason
<ul style="list-style-type: none"><li>• Allows for further work to be done through the Implementation and Funding Plan and time to consider these matters further</li><li>• Change 6 to the RPS provides the policy approach for ‘unanticipated’ and ‘out of sequence’ developments – avoids duplication or misalignment.</li><li>• A number of matters raised are of detail that is best dealt with through other processes and not in the strategy itself (eg agreements to support the settlement pattern, feasibility assessments etc).</li><li>• The NPS UD has a specific requirement for an FDS “Implementation Plan” that sits outside the FDS, providing greater flexibility for delivery to respond to changes in the operating environment.</li><li>• Moving the detailed housing map (Map 19) into the Implementation and Funding Plan allows for this to be updated on a regular basis.</li></ul>

**Date approved:**

**Approved by:**

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# SmartGrowth Strategy 2023–2073

## ISSUES AND OPTIONS PAPER

### Future Development Strategy – Business Industrial Land

Author: David Phizacklea

Topic	Industrial Land
Issue	<ol style="list-style-type: none"> <li>1. General – Potential future industrial land areas</li> <li>2. General – Providing for existing industrial activities</li> <li>3. Potential Future Business Area – Wairākei South</li> <li>4. Potential Future Business Area – Ōmokoroa/Apata</li> <li>5. Potential Future Business Area – Te Puna</li> <li>6. Potential Future Business Area – Te Puke</li> </ol>

Staff Narrative
<p><b>Overview of feedback received</b></p> <p>Eight submissions were received on the industrial land topic from:</p> <ul style="list-style-type: none"> <li>• Thwaites, Donald Alan – submitter 49</li> <li>• Te Puke Economic Development Group – submitter 64</li> <li>• Golden Bay, A Division of Fletcher Concrete &amp; Infrastructure – submitter 66</li> <li>• Waste Management NZ – submitter 74</li> <li>• Clear the Air &amp; Tauranga Moana Fumigant Group – submitter 78</li> <li>• Urban Task Force – submitter 81</li> <li>• SmartGrowth – submitter 82</li> <li>• Bell Road Limited Partnership – submitter 83.</li> </ul> <p><u>Issue 1: General – Potential future industrial land areas</u></p> <p>Four submitters sought new or alternative future potential business land locations be identified. These are addressed as separate issues for Bell Road/Wairākei South, Ōmokoroa/Apata, Te Puna and Te Puke. In addition, one submitter (SmartGrowth) sought specific additional wording to Map 18 of the draft FDS.</p> <p>One submitter (Clear the Air) seeks provision for heavy industry in specific suitable locations to enable the long-term relocation of existing heavy industry emitters where those activities are located in unsuitable locations.</p> <p><u>Issue 2: General – Providing for existing industrial activities</u></p> <p>Several submitters sought that the SmartGrowth Strategy better recognise existing industrial activities, with one submitter seeking that the impact of industrial activities be recognised.</p> <p>Golden Bay seeks recognition of existing industrial activities in the SmartGrowth Strategy. They seek amendments to ensure the operational and functional need of industrial activities on industrial land within the Port of Tauranga are supported, and that industrial activities are recognised for their contribution to both the</p>

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economy and assisting in housing delivery both at a regional and national level. Golden Bay also seek amendments to the draft SmartGrowth Strategy to provide for the continued development and intensification of existing industrial land to protect business and industrial land, which they consider will in turn assist in the growth of the regional and national economy and assist in housing supply.

Clear the Air & Tauranga Moana Fumigant Group seek that provision is made for heavy industry in specific suitable locations to enable the long term relocation of existing heavy industry emitters where those activities are located in unsuitable locations. They also seek that zoning and plan provisions be aligned with the National Planning Standards to differentiate light medium and heavy industry zones, and that integration between land use and regional plan provisions for air and water quality occur.

Waste Management NZ is concerned with providing for existing heavy industry and considers it is unclear how the SmartGrowth Strategy intends on meeting anticipated demand for industrial land. They seek:

- (a) equal recognition of existing industrial uses, particularly at the Truman Lane Site and the Oil Recovery Site, as well as recognition of the constraints industries face which otherwise hinders their ability to internalise all of their effects; and
- (b) recognition of the adverse health and amenity effects and reverse sensitivity effects, should residential housing be directed in proximity to effects-generating industrial activity.

#### Issue 3: Potential Future Business Area – Wairākei South

The Bell Road Limited Partnership submitted that no future industrial area has been identified in the draft FDS for the Eastern growth corridor. They consider that the Wairākei South area is suitable for urban development, and that engineering solutions are able to address flooding, coastal inundation risks and land quality and other constraints. A map is included as an appendix to their submission showing the Wairākei South land sought to be identified in the FDS for business employment and residential uses.

The Urban Taskforce states that no further business land has been identified in the strategy for the eastern/central corridor and considers that 60 ha of land needs to be brought forward [in this corridor]. They seek that further land is identified in the eastern/central corridor such as at Wairākei South to cater for future needs, and for the assessment tables on page 148 of the Strategy to be updated.

#### Issue 4: Potential Future Business Area – Ōmokoroa/Apata

Don Thwaites considers that further investigation of business land development at Apata is required.

#### Issue 5: Potential Future Business Area – Te Puna

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Don Thwaites considers that Te Puna is not a suitable location for any further industrial activity, while the Tauranga Urban Taskforce seeks Te Puna be included as a short and medium term growth area for business employment land based on the technical assessment work underpinning the draft strategy.

Issue 6: Potential Future Business Area – Te Puke

Te Puke Economic Development Agency seeks that new industrial land is made available in the vicinity of the Te Puke township and that the existing Te Puke West zoned land is enabled through the consenting process.

**Key considerations**

1. The extent to which the FDS needs to signal where future business land ie. industrial land, should be located ahead of structure planning, servicing, funding and plan change processes.

*It is recommended that the FDS provide certainty under the NPS-UD as to the potential locations for business land over the next 30 years, in the same manner as for residential growth areas.*

2. Whether potential future growth areas for business land are shown in the Eastern growth corridor.

*The HBA Business Capacity Assessment by Market Economics found there is sufficient existing zoned and planned industrial land in the Eastern growth corridor to meet the expected demand for business land over the next 30 years, including through the Rangiora Business Park. There is uncertainty as to the timing and additional business land requirements arising from the Eastern Town (Te Kāinga) and the timing of the delivery of business land in the Te Tumu growth area. Further information is required as to whether Wairākei South is suitable as a potential future business land location, given the flooding and other constraints within the Bell Road catchment.*

3. The need for clear direction on Upper Belk Road for the FDS on whether Upper Belk Road should be residential, industrial or a mix of both.

*The Government's SDP process under the Urban Development Act 2020 can be used to deliver on the growth requirements of this area. Kāinga Ora are expected to recommend to ministers a scenario which provides for 150-200ha of business land alongside residential housing. The need for business land in the Western growth corridor requires planning to commence as soon as possible in order to meet business land demand in the medium to longer-term.*

The following documents which inform and support the draft FDS business land section should also be referred to (available from the SmartGrowth website at the links below):

- [SmartGrowth Industrial Land Study – Technical Report, June 2023](#)
- [SmartGrowth Industrial Land Study – Supplementary Report, May 2023](#)
- [SmartGrowth Industrial Land Study – Further Investigations, November 2023](#)

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- [Tauranga City and Western Bay of Plenty Business Capacity Assessment December, 2022](#)

Options overview	
<b>Issue 1 General – Potential future industrial land areas</b>	<p><u>Option 1A:</u> Status Quo – Retain the draft FDS text and Map 18 locations showing potential long term growth areas for business land</p> <p><u>Option 1B:</u> Amend the draft FDS text showing potential long term growth areas for business land <b>(Recommended)</b></p> <p><u>Option 1C:</u> Amend the Map 18 locations text (page 154) showing potential long term growth areas for business land</p> <p><u>Option 1D:</u> Retain the draft FDS text and Map 18 locations showing potential long term growth areas for business land, but include a notation and outline of possible other sites that may be suitable</p>
<b>Issue 2: General – Providing for existing industrial activities</b>	<p><u>Option 2A:</u> Status quo – Retain current wording of the SmartGrowth Strategy and FDS in relation to existing industrial activities</p> <p><u>Option 2B:</u> Insert additional text to recognise existing industrial activities and their effects <b>(Recommended)</b></p>
<b>Issue 3: Potential Future Business Area – Bell Road/Wairākei South</b>	<p><u>Option 3A:</u> Status quo – Do not identify Wairākei South as a potential long term growth area for residential and/or business land in the FDS. <b>(Recommended)</b></p> <p><u>Option 3B:</u> Identify Wairākei South as a 'Potential long term growth area – business land' in Map 18 of the FDS and in the Business Employment Land assessment</p> <p><u>Option 3C:</u> Make no further changes to Map 18 and the Business Employment Land assessment but include a notation to identify Wairākei South as a potential future growth area</p>
<b>Issue 4: Potential Future Business Area – Ōmokoroa/Apata</b>	<p><u>Option 4A:</u> Status quo – Make no provision for further investigation of business land development at Apata and confirm Ōmokoroa as a potential future growth area on Map 18 <b>(Recommended)</b></p> <p><u>Option 4B:</u> Provide for further investigation of business land development at Apata</p>

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<b>Issue 5: Potential Future Business Area – Te Puna</b>	<p><u>Option 5A:</u> Status quo – Do not include Te Puna as a short and medium term growth area for business employment land in the FDS <b>(Recommended)</b></p> <p><u>Option 5B:</u> Include Te Puna as a short and medium term growth area for business employment land in the FDS</p>
<b>Issue 6: Potential Future Business Area – Te Puke</b>	<p><u>Option 6A:</u> Status quo – Do not provide for new industrial land in the vicinity of Te Puke and leave consenting of the existing Te Puke West zoned land to the appropriate processes <b>(Recommended)</b></p> <p><u>Option 6B:</u> Provide for new industrial land in the vicinity of Te Puke and support consenting of the existing Te Puke West zoned land</p>

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<b>Issue 1: General – Potential future industrial land areas</b>	
<b>Option 1A: Retain the draft FDS text and Map 18 locations showing potential long term growth areas for business land (Status Quo).</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Approach signals where certainty can be afforded to progress future structure planning and rezoning plan changes for industrial land in the northern and western corridors.</li> <li>Based on technical assessments supporting the potential long term growth areas for business land.</li> <li>Other submitters may have submitted on the draft FDS if other potential longer-term growth areas for business land were identified in the draft FDS.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Does not directly respond to some of the submission points received on the draft FDS.</li> </ul>
<b>Financial implications</b>	
None identified.	
<b>Other considerations</b>	
Also refer site specific issues and options 3, 4, 5 and 6 below.	

**Option 1B: Amend the draft FDS text to better clarify the potential long term growth areas for business land, as follows: (Recommended)**

- i. Add a table to page 148 after the existing strategic industrial land allocations table to show the Business Employment Land Growth Allocations for the next 30 years as follows:

“The following table outlines the potential additional business land allocations over the next 30 years and beyond, informed by the HBA and supporting desk-top assessments.

Potential Long-term Growth Area – Business Land	Allocation (hectares)	Delivery timing
Upper Belk Road	150-200	Long-term (2034-2054)
Ōmokoroa	70	Long-term (2034-2054)
Pukemapu*	115	Post-2054
Rangiuru Business Park extension	45	Long-term (2034-2054)
Eastern growth corridor**	Unknown	Post-2054

\* Pukemapu is subject to further assessment for urban purposes and feasibility

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\*\* Several options will be investigated to identify which, if any, potential growth areas for business land are required in the Eastern growth corridor beyond the 30 year period of the FDS.

- ii. Amend the text at page 149 (paragraphs 5, 6 and 7) as follows (text to be deleted shown ~~struck out~~; text to be inserted shown underlined):

"In addition to the above planned business land provision, a further 300 to 400 ha of greenfield land is required to support business (industrial) land uses within the sub-region over the next 30 years. ~~Technical investigations have identified the following possible locations for future business land within the current growth corridors:~~

- ~~• Northern Corridor – Ōmokoroa/Apata~~
- ~~• Eastern Corridor – Domain Rd/Tara Road/Bell Road, Te Puke, Rangiuru~~
- ~~• Western Corridor – Belk Road /Ōmanawa, Pukemapu~~

~~Some of these areas are also being investigated for potential residential and other land uses, for example the Belk Road plateau area.~~

~~Through more detailed desktop analysis, Ōmokoroa, Belk Road and Pukemapu have emerged as the preferred~~ The SmartGrowth Industrial Land Study has identified potential locations to provide for business land demand needs in the northern and western growth corridors at Ōmokoroa/Apata, Upper Belk Road and Pukemapu. ~~Some of the other potential locations have been identified as having natural hazard, environmental or infrastructure servicing constraints.~~ Potential business land locations in the Eastern growth corridor are not required within the period of the FDS. Possible sites have been identified at Wairākei South, Rangiuru, Paengaroa and Te Puke.

The locations of potential growth areas for business land are shown on Map 18 and are indicative only. For example, in the Northern growth corridor a potential growth area is identified in the general vicinity of Ōmokoroa and Apata adjacent to State Highway 2 for long-term consideration."

#### Advantages

- Provides greater certainty for future decision-makers, authorities, landowners, communities and developers
- Aligns with the residential urban growth table in the FDS in providing for the expected developable yield of business land with the potential growth areas.
- Reflects that feasibility studies and assessment to support a future plan change process for rezoning of land would be required.
- Allows for future consideration of other areas in the Eastern growth corridor.

#### Disadvantages

- Would result in removal of the possible future locations for strategic business land (short-listed sites).
- May provide less certainty for future decision-makers, authorities, landowners, communities and developers.

#### Financial implications

None identified. If required, amendments can be made to the FDS text and Map 18 within the existing budget.

#### Other considerations

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- The NPS-UD requires councils to spatially identify broad locations for development, infrastructure required and any constraints on development. In doing so the Future Development Strategy (FDS) is also required to balance the certainty regarding the provision of future urban development with the need to be responsive to demand for such development.
- The FDS forms the basis for integrated, strategic and long-term planning. An FDS helps local authorities set the high-level vision for accommodating urban growth over the long term, and identifies strategic priorities to inform other development-related decisions, such as:
  - district plan zoning and related plan changes
  - priority outcomes in long-term plans and infrastructure strategies, including decisions on funding and financing
  - priorities and decisions in regional land transport plans.

**Option 1C: Amend the Map 18 locations text (page 154) showing potential long term growth areas for business land, as follows:**

Add additional text to the FDS map alongside the existing text which states: "The Future Development Areas are indicative only". Additional text to state: "The Industrial Land Study has been undertaken using desktop information only, further investigations are required. The locations of potential industrial land as shown on the map are indicative only. For example, in the Northern Corridor there are a range of long listed sites in the Apata and Ōmokoroa area for long-term consideration."

**Advantages**

- Reflects that the SmartGrowth Industrial Land Study was a desk-top analysis of available information.
- Allows for future consideration of other areas.

**Disadvantages**

- Undermines the work undertaken to date in identifying the potential future locations for strategic business land.
- Provides less certainty for future decision-makers, authorities, landowners, communities and developers.
- Provides additional confusion as to the potential growth area identified on the map.
- The additional text is unnecessary as the existing text includes the sentence "The future development areas shown are indicative only".

**Financial implications**

None identified. If required, amendments can be made to the FDS text accompanying Map 18 on page 154 within the existing budget.

**Other considerations**

The additional wording is in response to one submitter, who considers land at Apata to be a more suitable location for future business land than the location adjacent to the Takitumu Northern Link interchange at Ōmokoroa identified in the SmartGrowth Industrial Land Study and further investigation work. Apata was assessed as part of the study and further investigation work.

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**Option 1D: Retain the draft FDS text and Map 18 locations showing potential long term growth areas for business land, but include a notation on Map 18 (pages 154) and outline of possible other sites that may be suitable in the text at pages 149 as follows:**

"Potential business land locations in the Eastern growth corridor are not required within the period of the FDS. Possible sites have been identified at Wairākei South, Rangiuru, Paengaroa and Te Puke."

**Advantages**

- Identifies other potential long-term growth area suitable for business land on Map 18, based on the short-listed areas in the draft FDS and in the SmartGrowth Industrial Land Technical Study report (Aurecon, June 2023)
- Enables the Eastern growth corridor sites to be included.
- Adopts the Future Proof approach in their FDS (2022) for identifying other possible sites for future industrial land in the subregion.

**Disadvantages**

- May disadvantage landowners and communities by indicating future business land.
- Would show additional longer-term growth areas for business land that are not required to meet the expected demand for business land. Sufficient supply is afforded from existing zoned industrial land, including the Rangiuru Business Park and in Te Puke.
- Would signal possible future urban development of land identified as highly versatile land.

**Financial implications**

None identified. If required, amendments can be made to the FDS text within the existing budget.

**Other considerations**

The extent to which other possible sites have sufficient information to carry forward into any formal RMA planning process.

**Issue 2: General – Providing for existing industrial activities**

*Refer also "Te Taiao Environment" issues and options paper*

**Option 2A: Status quo – Retain current wording of the SmartGrowth Strategy and FDS in relation to existing industrial activities**

**Advantages**

- Existing industrial activities are required to meet the relevant planning and consenting standards, which consider any adverse effects on the environment and the health and wellbeing of people.
- Reflects that the FDS is about planning for future growth and land use change.

**Disadvantages**

- May not adequately reflect the economic benefits of existing industry to the subregional and New Zealand as a whole.
- The existing draft strategy does not recognise that some emitting industrial activities are having an adverse effect on people and communities.

**Financial implications**

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None identified.

#### Other considerations

- Resource consenting requirements for industrial activities under the relevant City/District Plan and Regional Natural Resources Plan requirements.
- The Mount Industrial Planning Study which has considered mana whenua, businesses and community issues as to the co-existence or relocation of existing emitting industries and adjoining sensitive land uses within the industrial area. Tauranga City Council is to commence work towards a proposed city-wide commercial and industrial plan change during 2024 which will adopt the relevant specified zones under the National Planning Standards 2019.

#### Option 2B: Insert additional text to recognise existing industrial activities and their effects, as follows (text to be inserted shown underlined)(Recommended)

- Insert additional wording in Part 1: Introduction and Context – Economic Objectives to recognise and support existing industrial activities that provide for economic and housing growth. “Enable and support the continued establishment , operation and maintenance of existing industrial activities that contribute to the regional and national economy.”
- Amend wording in Part 1: Introduction and Context – Sub-Regional Context- Marine Corridor to recognise industrial activities also require shipping links to and from the Port of Tauranga.
- Amend wording in Part 2: The Growth Challenge – Opportunities to recognise that industrial activities are an economic opportunity for the region.
- Amend wording in Part 3: The Spatial Plan – Chapter 06. Urban Form and Centres introduction to include “construction materials” as a key industry to the nationally significant Port of Tauranga.
- Insert additional wording in Part 3: The Spatial Plan – Chapter 07. Housing – Housing system growth directives that supports existing local industries that provide for construction materials that assist in housing delivery.
- Insert additional wording in the draft FDS at page 148 that recognises the impacts of existing heavy industry as follows:  
“The SmartGrowth Strategy seeks to reduce the impacts of existing industrial activities on the environment and the health of people living or working in proximity to those activities. Opportunities for the relocation of existing industrial activities to other locations, both within and outside the sub-region, are supported where they will assist in reducing those impacts”.

#### Advantages

- Recognises that some emitting industrial activities are having an adverse effect on people and communities.

#### Disadvantages

- May not recognise the existing use rights of businesses operating lawfully within current regulatory requirements.
- Existing industrial activities are required to meet the relevant planning and consenting standards, which consider any adverse effects on the environment and the health and wellbeing of people.

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<b>Financial implications</b>
None identified. If required, amendments can be made to the FDS text within the existing budget.
<b>Other considerations</b>
<ul style="list-style-type: none"> <li>The NPS-UD requirements for future development strategies.</li> <li>The SmartGrowth Industrial Land Study technical report (Aurecon, 2023) identifies the possible areas for future business land within the sub-region that would be technically suitable for heavy industrial uses, however site-specific investigation would be required.</li> <li>The National Planning Standards 2019 are required to be given effect to by councils under the Resource Management Act 1991. Tauranga City Council is likely to commence implementing the commercial and industrial zoning from the National Planning Standards through a future plan change in 2024.</li> </ul>

<b>Issue 3: Potential Future Business Area – Wairākei South</b>	
<b>Option 3A: Status quo – Do not identify Wairākei South as a potential long term growth area for residential and/or business land in the current FDS. (Recommended)</b>	
Defer the consideration of Wairākei South for urban development and in the first instance, to consider catchment management options to manage natural hazard risk and ecology and water quality effects in the wider catchment including the Kaituna River.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Aligns with evidence-based decisions made around the FDS.</li> <li>Identifies that a catchment level approach is required to manage flood risk in the Bell Road catchment and the need to consider any development effects across the whole catchment, including both downstream and upstream.</li> <li>Maintains the SmartGrowth position that supports a ‘Go Carefully’ approach to this area.</li> <li>Lowers the risk of identifying a potential growth area that may not be able to be developed due to natural hazard, cultural or environmental constraints.</li> <li>Under this option consideration of Wairākei South for urban development would be deferred to the next FDS review in three year to enable catchment management options to manage natural hazard risk in the wider catchment and surrounding area to be evaluated.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Lost opportunity cost with willing developer and large land parcels in single ownership, near strategic transport corridors and labour supply.</li> <li>Relies on the sufficiency of desk top investigations undertaken to date through the SmartGrowth Industrial Land Study.</li> </ul>
<b>Financial implications</b>	

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None identified.

#### Other considerations

- Under this option further information would be required to demonstrate how flooding, geotechnical and other natural hazard risk would be adequately avoided, remedied or mitigated. A pathway would still exist for the Bell Road Limited Partnership to seek a private plan change.
- The Bell Road LP provided engineering, geotechnical and planning statements at the SmartGrowth hearings. These statements of evidence rely on a number of untested technical and expert conclusions in the face of known flooding, natural hazard risk and geotechnical issues identified by engineering staff at BOPRC, TCC and WBOPDC.
- The Bell Road catchment is currently serviced by a pumping scheme which indicates that flood risk is an existing issue. This suggests the Bell Road catchment is high risk and a precautionary approach should be adopted at this strategic planning step.
- While the location and transport benefits are acknowledged, these would not outweigh the wider issue of providing for urban growth in an overallocated stormwater catchment and resulting costs of resilience if development were to occur in a piece-meal fashion within the catchment.
- Acknowledgement of the Te Maru o Kaituna River Authority and the inconsistency of large-scale and incremental urban land use change in the surrounding and upstream catchments with the vision and objectives of the Kaituna River Document.
- Consideration of the likely requirements arising from the Proposed National Policy Statement for Natural Hazard Decision Making 2023.

#### Option 3B: Identify Wairākei South as a 'Potential long term growth area – business land' in Map 18 of the FDS and in the Business Employment Land assessment.

Specifically:

- i. Identify Wairākei South as a 'Potential long term growth area – business land' in Map 18 of the FDS and
- ii. Include Wairākei South in the Business Employment Land assessment on page 149 through the following changes:
  - Include 100ha of employment land in the 2027-2034 (medium term) and 45ha of employment land in the 2034-2054 (long term) planning periods.

#### Advantages

- Provides additional future business land capacity within the Eastern growth corridor.
- Provides certainty for the landowner (Bell Road Limited Partnership) to then seek a private plan change to progress any urban development of Wairākei South through the required rezoning process under the RMA.
- The amount of additional business land required to be identified within the subregion by way of other potential long-term growth areas for business uses would be reduced.

#### Disadvantages

- There is sufficient zoned business land within the Eastern growth corridor to meet expected demand over the next 30 years.
- While statements of geotechnical and engineering evidence were submitted to the hearing, this technical information does not enable the suitability of the land for urban development to be confirmed and that there will be no impact on the wider catchment.

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	<ul style="list-style-type: none"><li>• The SmartGrowth Industrial Land Study reports identify significant natural hazard issues which would need to be addressed to enable consideration of Wairakei South for urban development.</li><li>• Identifies land in the Eastern growth corridor ahead of other investigations around Rangiora (Eastern Town) and Te Puke (Te Puke Spatial Plan).</li><li>• Urban development at Wairākei South may result in downstream water quality and ecology effects on the Kaituna River and surrounding and lower catchment area which has been the benefit of substantial downstream restoration works.</li></ul>
<b>Financial implications</b>	
None identified.	
<b>Other considerations</b>	
<ul style="list-style-type: none"><li>• The Bell Road Limited Partnership provided further information at the hearings in relation to their submission as statements of evidence from planning, geotechnical and engineering experts. No technical reports were provided.</li><li>• While natural hazard risks and protection of the wider catchment would need to be satisfactorily addressed, Wairakei South has not been identified in the FDS as being required to provide residential and business land over the period of the FDS (2024-2054).</li><li>• It is recognised that there are constraints and opportunities in delivering the potential business land growth areas to the market.</li><li>• Acknowledgement of the Te Maru o Kaituna River Authority and the inconsistency of large-scale and incremental urban land use change in the surrounding and upstream catchments with the vision and objectives of the Kaituna River Document.</li></ul>	

<b>Option 3C: Make no further changes to pages 148 and 149 and Map 18 (Page 154) <u>but</u> include a notation to identify Wairākei South as a potential future growth area</b>	
<b>Advantages</b> <ul style="list-style-type: none"><li>• Bell Road is already identified as a possible site in the draft FDS at page 149.</li><li>• Provides a potential future pathway for urban development.</li></ul>	<b>Disadvantages</b> <ul style="list-style-type: none"><li>• Lost opportunity cost.</li><li>• No sites in the Eastern growth corridor are currently shown in the draft FDS Map 18.</li><li>• Downstream water quality and ecology effects on the Kaituna River and surrounding and lower catchment area which has been the benefit of substantial downstream restoration works.</li></ul>
<b>Financial implications</b>	
None identified.	

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**Other considerations**

- Bell Road is specifically referred to as a potential site at page 149 of the draft FDS along with the other possible sites deemed suitable for industrial land uses. The three yearly review of the SmartGrowth Strategy/FDS required by the NPS-UD allows for changes and any additional potential growth areas to be included in the strategy should these be able to be supported.
- Under this option Wairākei South would be identified in some form in the FDS as subject to technical investigations. FutureProof included three other possible business land sites in their FDS on a separate map as subject to further investigation.
- Acknowledgement of the Te Maru o Kaituna River Authority and the inconsistency of large-scale and incremental urban land use change in the surrounding and upstream catchments with the vision and objectives of the Kaituna River Document.

**Issue 4: Potential Future Business Area – Ōmokoroa/Apata****Option 4A: Status quo – Make no provision for further investigation of business land development at Apata and confirm Ōmokoroa as a potential future growth area on Map 18 (Recommended)****Advantages**

- Maintains the recommended position put forward in the draft FDS that Apata is not a potential future long-term strategic growth area for business land.
- Locks in Ōmokoroa (adjacent to the proposed Takitumu Northern Link interchange) as a potential future growth area in the FDS.
- Lowers the risk of identifying a potential growth area that may not be able to be developed due to natural hazard, cultural or environmental constraints.

**Disadvantages**

- SmartGrowth may be seen as insufficiently responsive to development requests in the context of the projected long-term shortfall in business land.
- Relies on the sufficiency of desk top investigations undertaken to date through the SmartGrowth Industrial Land Study.

**Financial implications**

None identified.

**Other considerations**

- For the northern growth corridor further industrial land in proximity to the Ōmokoroa urban growth area is considered more appropriate to enable live, work, learn and play to meet the future needs of this population.
- Apata was investigated and is further away from potential labour force, contains highly versatile land and would result in greater transport emissions.
- The Port of Tauranga has no current interest in a freight hub or inland port at Apata.

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<b>Option 4B: Provide for further investigation of business land development at Apata</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Would recognise the Apata rail yards and rail transport connections.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Desk top investigations of Apata and other sites in the vicinity of Ōmokoroa have been undertaken through the SmartGrowth Industrial land Study. Apata did not score as highly as the Ōmokoroa sites.</li> </ul>
<b>Financial implications</b>	
Funding for any further investigations would be required.	
<b>Other considerations</b>	
<ul style="list-style-type: none"> <li>For the northern growth corridor further industrial land in proximity to the Ōmokoroa urban growth area is considered more appropriate to enable live, work, learn and play to meet the future needs of this population.</li> <li>Apata was investigated and is further away from the potential labour force of Ōmokoroa, contains highly versatile land and would result in greater transport emissions.</li> <li>The Port of Tauranga has no current interest in a freight hub or inland port at Apata.</li> </ul>	

<b>Issue 5: Potential Future Business Area – Te Puna</b>	
<b>Option 5A: Status quo – Do not include Te Puna as a short and medium term growth area for business employment land in the FDS (Recommended)</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Provides certainty for the Te Puna community given recent concerns with industrial land development and zoning at Te Puna Station Road.</li> <li>Maintains the recommended position put forward in the draft FDS that Te Puna is not a potential future long-term strategic growth area for business land.</li> <li>Lowers the risk of identifying a potential growth area that may not be able to be developed due to natural hazard, cultural or environmental constraints.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>SmartGrowth may be seen as insufficiently responsive to development requests in the context of the projected long-term shortfall in business land.</li> <li>Fails to recognise the technical supporting assessments, which identified Te Puna (in the vicinity of SH2/Minden Road) as the highest scoring MCA site in the long-listing phase of the SmartGrowth Industrial Land Study technical report (Aurecon, 2023).</li> </ul>
<b>Financial implications</b>	
None identified.	
<b>Other considerations</b>	

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For the northern growth corridor further industrial land in proximity to the Ōmokoroa urban growth area is considered more appropriate to enable live, work, learn and play to meet the future needs of this population.

#### Option 5B: Include Te Puna as a short and medium term growth area for business employment land in the FDS

##### Advantages

- Recognises the technical supporting assessments, which identified Te Puna (in the vicinity of SH2/Minden Road) as the highest scoring MCA site in the long-listing phase of the SmartGrowth Industrial Land Study technical report (Aurecon, 2023).
- Strategic location with Takitimu Northern Link.

##### Disadvantages

- The Te Puna community has not been engaged with on whether Te Puna should be a potential future long-term strategic growth area for business land.
- Wastewater servicing of a new growth area at Te Puna would need to be provided.

##### Financial implications

None identified.

##### Other considerations

- While desktop analysis supports the potential suitability of Te Puna as a future long-term strategic growth area for business land, it is considered there are better sites within the northern growth corridor that support the growth and development at Ōmokoroa.
- A process to develop a community led spatial plan for Te Puna is likely to commence in the next two years, which will consider the issues facing Te Puna and what actions may be required. This will canvass whether further urban development is enabled or restricted.

#### Issue 6: Potential Future Business Area – Te Puke

##### Option 6A: Status quo – Do not provide for new industrial land in the vicinity of Te Puke and leave consenting of the existing Te Puke West zoned land to the appropriate processes (Recommended)

##### Advantages

- Maintains the recommended position put forward in the draft FDS that Te Puke is not currently a potential future long-term strategic growth area for additional business land.
- Lowers the risk of identifying a potential growth area that may not be able to be developed due to natural hazard, cultural or environmental constraints.

##### Disadvantages

- May result in lost business opportunities for Te Puke.
- SmartGrowth may be seen as insufficiently responsive to development requests in the context of the projected long-term shortfall in business land.

##### Financial implications

None identified.

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Other considerations	
<ul style="list-style-type: none"> <li>The development potential for Te Puke West has been there for some time and was zoned through a private plan change. Whether the current industrial zoning is appropriate should be a matter for the Te Puke Spatial Plan to consider and engage with landowners, stakeholders and the community on options.</li> </ul>	
Option 6B: Provide for new industrial land in the vicinity of Te Puke and support consenting of the existing Te Puke West zoned land	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Provides further business land capacity at Te Puke.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Identifies land in the eastern growth corridor ahead of other investigations around Rangiora (Eastern Town) and Te Puke (Te Puke Spatial Plan).</li> <li>The SmartGrowth Strategy and FDS is not able to circumvent the resource consenting requirements under the RMA to provide for the development of existing zoned industrial land.</li> </ul>
Financial implications	
None identified.	
Other considerations	
<ul style="list-style-type: none"> <li>The Te Puke West zoned industrial land has significant geotechnical and stormwater issues to be addressed in obtaining the necessary resource consents. Existing processes under the RMA and Western Bay of Plenty District Plan provide for the development of Te Puke West if those issues are able to be satisfactorily addressed.</li> <li>Plan Change 94 (Washer Road industrial area) was made operative by WBOPDC in December 2022 and provides additional industrial zoned land at Te Puke.</li> <li>The Te Puke Spatial Plan is being undertaken by WBOPDC with the community, tangata whenua and stakeholders, including Te Puke Economic Development Group. This process is expected to be completed towards the end of 2024 and may identify the need for additional business land to service local demand.</li> </ul>	

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Recommended Decisions																				
Issue 1: General – Potential future industrial land areas																				
<p><u>Option 1B:</u> Amend the draft FDS text to better clarify the potential long term growth areas for business land, as follows:</p> <p>i. Add a table to page 148 after the existing strategic industrial land allocations table to show the Business Employment Land Growth Allocations for the next 30 years as follows:</p> <p>“The following table outlines the potential additional business land allocations over the next 30 years and beyond, informed by the HBA and supporting desk-top assessments.</p> <table> <tr> <th>Potential Long-term Growth Area – Business Land</th><th>Allocation (hectares)</th><th>Delivery timing</th></tr> <tr> <td>Upper Belk Road</td><td>150-200</td><td>Long-term (2034-2054)</td></tr> <tr> <td>Ōmokoroa</td><td>70</td><td>Long-term (2034-2054)</td></tr> <tr> <td>Pukemapu*</td><td>115</td><td>Post-2054</td></tr> <tr> <td>Rangioru Business Park extension</td><td>45</td><td>Long-term (2034-2054)</td></tr> <tr> <td>Eastern growth corridor**</td><td>Unknown</td><td>Post-2054</td></tr> </table> <p>* Pukemapu is subject to further assessment for urban purposes and feasibility  ** Several options will be investigated to identify which, if any, potential growth areas for business land are required in the Eastern growth corridor beyond the 30 year period of the FDS.</p> <p>ii. Amend the text at page 149 (paragraphs 5, 6 and 7) as follows (text to be deleted shown <del>struckout</del>; text to be inserted shown <u>underlined</u>):</p> <p>“In addition to the above planned business land provision, a further 300 to 400 ha of greenfield land is required to support business (industrial) land uses within the sub-region over the next 30 years. <del>Technical investigations have identified the following possible locations for future business land within the current growth corridors:</del></p> <ul style="list-style-type: none"> <li><del>• Northern Corridor – Ōmokoroa/Apata</del></li> <li><del>• Eastern Corridor – Domain Rd/Tara Road/Bell Road, Te Puke, Rangioru</del></li> <li><del>• Western Corridor – Belk Road/Ōmanawa, Pukemapu</del></li> </ul> <p><del>Some of these areas are also being investigated for potential residential and other land uses, for example the Belk Road plateau area.</del></p> <p><del>Through more detailed desktop analysis, Ōmokoroa, Belk Road and Pukemapu have emerged as the preferred</del> <u>The SmartGrowth Industrial Land Study has identified potential locations to provide for business land demand</u></p>			Potential Long-term Growth Area – Business Land	Allocation (hectares)	Delivery timing	Upper Belk Road	150-200	Long-term (2034-2054)	Ōmokoroa	70	Long-term (2034-2054)	Pukemapu*	115	Post-2054	Rangioru Business Park extension	45	Long-term (2034-2054)	Eastern growth corridor**	Unknown	Post-2054
Potential Long-term Growth Area – Business Land	Allocation (hectares)	Delivery timing																		
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needs in the northern and western growth corridors at Ōmokoroa/Apata, Upper Belk Road and Pukemapu. ~~Some of the other potential locations have been identified as having natural hazard, environmental or infrastructure servicing constraints.~~ Potential business land locations in the Eastern growth corridor are not required within the period of the FDS. Possible sites have been identified at Wairākei South, Rangiuru, Paengaroa and Te Puke.

The locations of potential growth areas for business land are shown on Map 18 and are indicative only. For example, in the Northern growth corridor a potential growth area is identified in the general vicinity of Ōmokoroa and Apata adjacent to State Highway 2 for long-term consideration."

### **Issue 2: General – Providing for existing industrial activities**

Option 2B: Insert additional text to recognise existing industrial activities and their effects, as follows (text to be inserted shown underlined):

- i. Insert additional wording in Part 1: Introduction and Context – Economic Objectives to recognise and support existing industrial activities that provide for economic and housing growth. "Enable and support the continued establishment, operation and maintenance of existing industrial activities that contribute to the regional and national economy."
- ii. Amend wording in Part 1: Introduction and Context – Sub-Regional Context–Marine Corridor to recognise industrial activities also require shipping links to and from the Port of Tauranga.
- iii. Amend wording in Part 2: The Growth Challenge – Opportunities to recognise that industrial activities are an economic opportunity for the region.
- iv. Amend wording in Part 3: The Spatial Plan – Chapter 06. Urban Form and Centres introduction to include "construction materials" as a key industry to the nationally significant Port of Tauranga.
- v. Insert additional wording in Part 3: The Spatial Plan – Chapter 07. Housing – Housing system growth directives that supports existing local industries that provide for construction materials that assist in housing delivery.
- vi. Insert additional wording in the draft FDS at page 148 that recognises the impacts of existing heavy industry as follows:  
"The SmartGrowth Strategy seeks to reduce the impacts of existing industrial activities on the environment and the health of people living or working in proximity to those activities. Opportunities for the relocation of existing industrial activities to other locations, both within and outside the sub-region, are supported where they will assist in reducing those impacts".

### **Issue 3: New Potential Growth Area – Wairākei South**

Option 3A: Status quo – Do not identify Wairākei South as a potential long term growth area for residential and/or business land in the current FDS.

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<b>Issue 4: New Potential Future Business Area – Ōmokoroa/Apata</b>
<u>Option 4A:</u> Status quo – Make no provision for further investigation of business land development at Apata and confirm Ōmokoroa as a potential future growth area on Map 18.
<b>Issue 5: New Potential Future Business Area – Te Puna</b>
<u>Option 5A:</u> Status quo – Do not include Te Puna as a short and medium term growth area for business employment land in the FDS.
<b>Issue 6: New Potential Future Business Area – Te Puke</b>
<u>Option 6A:</u> Status quo – Do not provide for new industrial land in the vicinity of Te Puke and leave consenting of the existing Te Puke West zoned land to the appropriate processes.

<b>Recommended Reasons</b>
<p>The Housing and Business Capacity Assessment (HBA) business land assessment by Market Economics determined business land requirements and expected shortfall in the longer-term (10–30 year period from 2034–2054). The HBA assessment considered existing and planned business land within the Eastern growth corridor will be sufficient to meet the expected market demand for business land over the next 30 years.</p> <p>The Te Puke Spatial Plan is to be progressed by Western Bay of Plenty District Council over the next 12 months and will identify if any additional local business land is required to support this community and expected growth. The current Te Puke West zoned industrial land is proposed to be reconsidered through this spatial plan process, given the difficulties in addressing stormwater, access and other issues over the area.</p> <p>Similarly, while no potential sub-regional growth area for business land is identified or required at Te Puna, future work on a Te Puna Spatial Plan may identify the need for local business land, which can be considered again at the next review of the FDS in three years' time.</p> <p>It is intended as part of the SmartGrowth Implementation and Funding Plan for a whole of catchment investigation of possible future urban development scenarios within the Bell Road/Kaituna River catchment, including Wairākei South, Te Puke, Paengaroa and Te Kāinga. There is insufficient information currently to enable the requested Wairākei South growth area to be identified as a potential longer term growth area for business in Map 18 and the FDS tables at pages 148–149 of the strategy. The suitability of this area for urban development remains questionable given natural hazard risks, including flooding within the wider catchment and future climate change impacts. A whole of catchment approach to the consideration of possible future urban development scenarios within the Bell Road/Kaituna River catchment is required.</p>

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The location of potential long-term growth areas for business land in the Northern growth corridor is confirmed in the vicinity of Ōmokoroa from desk top analysis and technical information available to date. The strategic location adjoining the Ōmokoroa urban growth areas and future Takitumu Northern Link Stage 2 interchange support the identification of this area on Map 18 of the strategy. However, that does not preclude a more suitable area in the wider Ōmokoroa/Apata area through future feasibility assessment ahead of structure planning and rezoning.

Upper Belk Road is confirmed as a potential long term growth area for business land to assist in addressing the business land shortfall in the Western growth corridor and this is supported by current demand and uptake in the Tauriko Business Estate and its planned extension into Stage 4. An allocation of 150–200ha of developable land for business use (industrial employment) has been allowed for in the FDS, within a wider growth area that would provide for residential housing, open space and other land uses in future. Upper Belk Road planning is expected to occur in conjunction with a Government led Specified Development Projects process under the Urban Developments Act 2000.

It is accepted that current heavy industry has a place in the western Bay of Plenty subregion, while also acknowledging that some emitting industry can have adverse effects on the wellbeing of people and communities. Additions to the strategy are recommended in response to submissions received concerned about the importance of industry not being highlighted, as well as those concerned about air quality and other impacts. The SmartGrowth partnership supports efforts to address land use conflicts that currently exist and to ensure that future planning for greenfield areas avoids creating adverse impacts on any adjoining sensitive land uses.

The SmartGrowth Implementation and Funding Plan is to also consider as an action taking a subregional approach to applying the National Planning Standards 2019 for business land (in response to the submissions from Clear the Air and the Urban Taskforce). Initial work has been undertaken by officers from Western Bay of Plenty District Council and Tauranga City Council on applying the planning standards to centres and business land across the subregion.

**Date approved:**

**Approved by:**

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# SmartGrowth Strategy 2023–2073

## ISSUES AND OPTIONS PAPER

### Housing

**Author: Simone Cuers**

<b>Topic</b>	Chapter 7. Housing
<b>Issues</b>	<ol style="list-style-type: none"> <li>1. Incorporate sustainability standards in new homes</li> <li>2. Use inclusionary zoning to achieve housing outcomes</li> <li>3. Intensification in existing urban areas</li> <li>4. Role of local government</li> <li>5. Māori housing</li> <li>6. Social / community housing</li> <li>7. Strengthen focus on housing outcomes in the Strategy</li> <li>8. Develop monitoring and reporting framework for SmartGrowth sub regional Housing Systems Plan</li> </ol>

#### Staff Narrative

##### Overview of feedback received

A total of 25 submissions were received regarding *Chapter 7. Housing*, which incorporated many submission points. One submitter raised additional issues relating to Housing at the Hearings on 4 and 5 December 2023. These two issues are described and discussed in section 7. *Strengthen focus on housing outcomes in the Strategy*.

Analysis of submitters' response to Housing questions '*We want you to feel confident that we have a plan in place to manage growth. Do you think we are focusing on the right things?*' showed:

- Five submissions supported the Housing approach in the strategy
- Six submissions opposed the Housing approach in the Strategy

Three simply responded 'yes' to the above Housing question (Callum Van de Weyer, Nathan Wansbrough, Ruth Underwood). Nga Potiki a Tamapahore Trust agreed to adopting the housing issues listed in the Strategy and housing system growth directives. Julie Andrews endorsed the 'paradigm shift' and 'using all the tools available' to ensure future development provides the range of housing options the community needs.

One submission replied simply 'no' in response to the Housing questions (John Robson). Another replied 'no' adding that housing development should stop going out, start going up (Lee Jared). Conversely another submitter spoke against intensification of housing in the Bay. Six submitters indicated the Strategy does not go far enough to address housing gaps. One submitter indicated housing issues should be left to central government, council should concentrate on council core priorities (Wendy Wilson-Jenks).

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The five submissions which provided detail on how they oppose the Housing approach have been allocated to relevant sections of this Report as outlined below, to respond appropriately to issues raised.

Submission	Section of Report
The Strategy offers no path towards any real prospect of an increase in public housing supply or tenure law reform that might lead to the stated aspiration of increasing affordable housing, (Beth Bowden).	Strengthen focus on housing outcomes in the Strategy
Housing is a human rights issue, (Carole Gordon), we have a housing crisis, this region has failed in provision of homes for an ageing population and the Strategy does not address this.	Strengthen focus on housing outcomes in the Strategy
Housing development should stop going out, start going up, (Lee Jared).	Intensification in existing urban areas
Opposes intensification of housing in the Bay; that infill causes stress from closer living, creates ugly boxes, and that we have enough land in New Zealand to not have to intensify, (David Lucas).	Intensification in existing urban areas
Housing issues should be left to central government, council should concentrate on council core priorities, (Wendy Wilson-Jenks).	Role of local government

Submissions have been categorised into the following themes:

1. Incorporate sustainability standards in new homes
2. Use inclusionary zoning to achieve housing outcomes
3. Intensification in existing urban areas
4. Role of local government
5. Māori housing
6. Social / community housing
7. Strengthen the focus on housing outcomes in the Strategy
8. Develop monitoring and reporting framework for SmartGrowth sub regional Housing Systems Plan

#### **1. Incorporate sustainability and accessibility standards in new homes**

Two submissions were received both of which proposed new homes should be built to higher sustainability standards including; accessibility, rainwater harvesting and solar panels for hot water heating and electricity supply, (Heather Smith – Kerr and Ruth Underwood). The proposed sustainability standards are consistent with these SmartGrowth 2023's Environmental and Social Objectives:

- *Encourage sustainable development and adaptive planning*
- *Respond and adapt to climate change through building resilience, support the transition to lower carbon and improving biodiversity.*
- *Enable and shape an inclusive, safe, sustainable, efficient, and more vibrant urban form.*
- *Enable and support sufficient housing supply in existing and new urban areas to meet current and future needs, this includes a range of housing types, tenures, and price points.*

#### Discussion

These submissions speak to the topic of housing being fit for purpose for inhabitants across their lifespan. Housing which is accessible provides more housing choice for people with disabilities and enables people to age in place; and housing fitted with devices which produce energy, (e.g., solar panels) or harvest rainwater can provide a home with lower operating costs. The November 2023 credit report from Centrix shows reductions in home operating costs would be welcome as the number of households

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struggling financially rise; “*arrears continue to climb for mortgages, personal and vehicle loans, and credit cards. In fact, mortgage arrears are up 25% year-on-year, which could be a concern as households across the country continue to roll off fixed rates and into new, higher interest rates*”. <https://www.centrix.co.nz/credit-indicator/>

Understanding recent, and ongoing, changes to the Building Code and Residential Tenancies Regulations, and benefit and costs of achieving new standards are a key consideration. A recent example is November 2021 MBIE (Ministry of Business, Innovation and Employment) announcement on increases to roof, window, wall, and underfloor insulation requirements. The benefits are clear, as these aim to reduce energy needed for heating residential homes by approximately 40%, and aim to deliver warmer, drier, and healthier homes that are significantly cheaper to heat while also generating carbon savings through energy efficiency. There is however a significant increase in construction costs because of the changes, which is passed on to buyers and contributes to an overall increase in the ‘upfront’ cost of housing.

The Residential Tenancies (Healthy Homes Standards) Regulations 2019 commenced on 1 July 2019, with the aim of addressing issues with cold, damp, drainage, and draughts in rental properties. The regulations include minimum standards for: heating, insulation, ventilation, moisture ingress (dampness) and drainage and draught stopping. Kāinga Ora – Homes and Communities, and registered Community Housing Provider houses must comply with the healthy homes standards by 1 July 2024. All rental homes must comply with the healthy homes standards by 1 July 2025.

Directing sustainability and accessibility standards in new homes is outside SmartGrowth’s remit. Opportunities to achieve these standards may be addressed in future changes to government regulations, for example accessibility standards via Building Code changes.

#### Option for consideration

Recommend note the submissions and make no changes to the Strategy.

## **2. Use inclusionary zoning to achieve housing outcomes**

The use of inclusionary zoning to achieve housing outcomes was proposed by four submitters as follows:

- a. it is a key part of the Housing Strategy, (Pauline Bennett)
- b. it is key to the SmartGrowth Strategy, (Sustainable BOP)
- c. inclusionary zoning, or even more prescriptive planning controls, needed to manage the impact of competing land uses, (Beth Bowden)
- d. co-ordinate advocacy with other local authorities to central government on legal mechanisms for inclusionary zoning, (Christine Ralph)

#### Discussion

Inclusionary zoning as a planning control for achieving specific housing outcomes in conjunction with developers is a much-discussed option and can contribute to addressing housing gaps, however the policy and legislative setting has not been set by central government. To date inclusionary zoning has only been implemented in New Zealand via voluntary agreement with developers in Queenstown Lakes. QLDC has

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utilized inclusionary zoning since 2003 to capture a portion of the value created when land is up zoned. Funding and land captured has been utilised by their community housing trust to deliver social housing, affordable housing to rent and purchase, including retained affordable product. QLDC took this approach as Queenstown-Lake's house prices are much more expensive than the New Zealand average and have been persistently high in the district relative to local incomes. QL's house price to income ratio in 2023 it was 15.50, Tauranga's was 8.51.

This year *Waikato Housing Initiative's* councils, (e.g. Hamilton, Waikato South, Waipa), have commenced work on implementing inclusionary zoning in their councils, also in response to lack of affordable housing.

#### Option for consideration

Recommended decision is note the submissions and make no changes to the Strategy.

It is suggested SmartGrowth advocate to central government for clear direction on inclusionary zoning.

Smartgrowth, via the Housing Action Group, will maintain a watching brief on Waikato Housing Initiative's inclusionary zoning work in their district, (e.g., Hamilton, Waikato South, Waipa).

### **3. Intensification in existing urban areas**

Ten submissions were received:

- Five supported intensification
- One sought clarification on density numbers and costs of infrastructure in intensification versus greenfield costs
- Two submissions gave qualified support for intensification.
- One submission spoke to need to mitigate against adverse impacts from intensification
- One opposed intensification

Support for intensification:

- Housing development should stop going out, start going up, (Lee Jared).
- In favour of intensification over sprawl because of carbon reduction and environmental factors. (Julie Andrews)
- Consider limiting the scope of greenfield land development and give immediate priority focus to planned quality intensification of Te Papa and other brownfield existing areas, (Carole Gordon).
- Three to eight storey single floor apartments developed within current urban areas are a priority as they could provide security of tenure even if privately owned, along with priority for Elder Social Houses and rent to own for all other groups. Because lifts are required, there is no discrimination against Elders and persons with disabilities. (Pauline Bennett).
- Housing for larger families, (including multi-generational households), can also form part of intensification strategies. Those in poverty should not be

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marginalised to the sidelines, we must ensure they are integrated with society and are supported responsibly. This creates truly diverse communities, (CPAG).

Queries about intensification:

- Will intensification mostly be 2–3 story townhouses, or 4–6–8 story apartments? The dots on the map seem to indicate 4–8 stories, but is that realistic? (Sustainable BOP Trust).
- It is also unclear whether the proposed TCC Plan Change 33 has been assumed as part of the Strategy or, if not, what its impact would be if it were to go through, (Beth Bowden). The proposed TCC Plan Change 33 is part of the Strategy.
- 

Two submitters provide qualified support for intensification:

- More community discussion is needed on the nature of intensification itself and how 15-minute neighbourhoods can be delivered, (Beth Bowden).
- The negative impacts of intensification, in particular overshadowing and privacy need to be effectively mitigated, (Ruth Underwood).

One submitter spoke against intensification of housing in the Bay; that infill causes stress from closer living, creates ugly boxes, and that we have enough land in New Zealand to not have to intensify, (David Lucas).

#### Discussion

Intensification is a key policy in central government's *National Policy Statement on Housing and Urban Development*, (NPS – HUD) which sets out the role of local government. Both TCC and WBOPDC are defined as Tier 1 urban environments in NPS–HUD, and as such are required to plan for intensification. Thus, the intensification approach, or whether to go 'up or out', is part of central government policy and subsequently in the SmartGrowth Strategy, which tries to provide the right balance.

#### Option for consideration

Recommended decision is to note the submissions and make no changes to the Strategy.

As the balance between greenfields and intensification is a key platform of the SmartGrowth Strategy's connected centres programme, no changes are proposed. This issue is also addressed in the IOP for Urban Form and Centres.

#### **4. Role of local government**

Three submitters spoke to the role of local government in the housing space – two argued councils have a significant role to play in addressing housing needs across the region. Scott Nicholson and Christine Ralph stated there should be a greater emphasis on the role of councils in addressing housing stress and needs across the region, that councils have a key role in leading the creation and implementation of both local and subregional housing strategies, the latter via active participation in the Housing Action

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Plan Group. Ensuring councils have dedicated staff skilled in housing development to undertake facilitation and advocacy roles was also proposed.

One submitter indicated housing issues should be left to central government, council should concentrate on council core priorities, (Wendy Wilson-Jenks).

#### Discussion

Local governments' role in housing is not discretionary, the role is set out in central government legislation and policy. The purpose of local government as listed in the Local Government Act 2022 is to promote the social, economic, environmental, and cultural well-being of communities in the present and for the future. Councils principally support the provision of housing through their planning and consenting functions, and through provision of services and infrastructure. The National Policy Statement on Housing and Urban Development, (NPS – HUD) specifies how local governments are to deliver on housing policy. Both TCC and WBOPDC are defined as Tier 1 urban environments in NPS-HUD, and as such are required to deliver on a range of policies regarding housing.

#### Option for consideration

Recommended decision is to note the submissions and make no changes to the Strategy.

There is value in strengthening integration and partnering between all players in the local housing system (councils, central government, private market housing developers and builders, community housing providers, and social service providers) around their respective roles in housing planning and provision. This will be led by the Housing Action Working Group, as part of implementation; driving, and delivering on the sub regional Housing Systems Plan.

### **5. Māori housing**

Four submissions were received speaking to considerations of population growth, barriers to developing housing for Māori along with suggested solutions.

Submissions from the tāngata whenua collective (CTWF workshop) and Ngai Tukairangi Trust asked how can we manage growth and provide houses for others, when we can't currently and adequately provide homes for our own? Where is the manaakitanga and kotahitanga? Our current population requires priority over future population. We need to ensure that manuhiri are not prioritised over mana whenua. Māori are already overrepresented in the worst statistics relating to employment, income, housing, and homelessness. The SmartGrowth Strategy needs to ensure that Māori are not left further behind. Increasing the supply of housing/rentals is good but needs to cater for the range of needs, especially lower income. We need affordable rentals and homes in urban areas as well as the ability to build on our whenua. In relation to Māori land development, (tāngata whenua collective submission), indicated infrastructure costs are so large, just as huge a cost as paying for a house.

Nga Potiki a Tamapahore Trust agree with and support the challenge of enabling Tangata Whenua to realise values and aspiration for their whenua and indicate

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development of Māori land is also hampered by zoning rules and other regulations that do not reflect the needs or aspirations of Māori. However, the focus of the cultural well-being on papakainga development on Māori land only is myopic and does not address other important issues.

Submitters proposed the following:

- Māori land be free from rates and reduce water charges, (tāngata whenua collective submission)
- Streamline resource consenting to fast-track housing build, (tāngata whenua collective submission and Ngai Tukairangi Trust).
- Establish Māori bank to source reasonable price finance, (tāngata whenua collective submission )
- There is space for more housing in Maketu, only Tāngata Whenua should build there, (Tania Pirere).

#### Discussion

These are key points. An in-depth analysis of how District Plans are enabling housing for Māori on whenua Māori and in urban areas is required to ensure consenting and other council processes support efficient housing development. A new Housing System Growth Directive is recommended below, and the in-depth analysis can form part of the Implementation Plan of the Strategy, via the Housing System's Plan..

#### Option for consideration

Recommended decision is add new Housing System Growth Directive .*"8. District Plans, policies, toolkits, and funding programs enable housing for Māori on whenua Māori and barriers to delivery are actively addressed."*

### **6. Social / community housing**

Four submissions were received all of which support social housing provision and increases in the subregion.

- Social housing supply should be increased in the subregion – Child Poverty Action Group (CPAG) has suggested nationally we need to increase the number of State-Owned Units from 3.2% to 4% by 2030 and 5% by 2040. The current Social Housing base in WBOP being less than 2% is not good enough and should be addressed.
- Central government funding for social housing should be prioritised to Community Housing Providers, not via central government provision, (Pauline Bennett)
- Ensure elderly, disabled and most vulnerable residents' housing needs are met, (Sustainable BOP)
- Suggested additions, (Christine Ralph), to the Housing Directives and Implementation Plan including the following:
  1. Support and collaborate with central government through project grant schemes, state housing provision, fiscal support for Community Housing projects, partnering in exemplar affordable housing projects.

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2. Continue to support the homeless sector initiatives.
  - Another submitter spoke to addressing this; Julie Andrews stated as homelessness increases and options to relocate decrease, we need initiatives – Auckland’s city mission seems a great initiative.
3. Continued council subsidisation of development/financial contributions.

#### Discussion

The draft housing chapter and growth directives include a directive for increasing public housing supply, however a clearer expression of roles in public housing provision will add value to the Strategy. Option for consideration

Recommended decision is change growth directive 6. From “Public housing supply is increased and aligns the typologies of new and existing housing stock to match the needs of the community.”

To “6. Central government leads increase in public housing supply and aligns the typologies of new and existing housing stock to match the needs of the community.”

#### **7. Strengthen the focus on housing outcomes in the Strategy.**

Six submissions spoke to the Housing Chapter not providing solutions:

1. The Housing Chapter summarised some of the challenges in the housing sector but has not identified solutions. It has been well documented over time that housing problems in the WBOP are very serious and have proven very difficult to solve, both for the short term and long term, (CPAG).
2. The Strategy offers no path towards any real prospect of an increase in public housing supply or tenure law reform that might lead to the stated aspiration of increasing affordable housing, (Beth Bowden).
3. How will this Strategy realistically result in affordable housing? (Sustainable BOP Trust)
4. How much affordable housing is anticipated and how is “affordable” defined? (Sustainable BOP Trust)
5. Housing is a human rights issue, (Carole Gordon), we have a housing crisis, this region has failed in provision of homes for an ageing population and the Strategy does not address this.

The older age group of over 65 years is going to be a considerable proportion of the population, nearly one in three in Tauranga by 2030. However, there is limited information in the Strategy on specific ideas considering and planning for this impending wave, (SocialLink). The submissions raise key points with regards to how the housing system will respond to the sub-region’s changing demographics, in particular its ageing population and increasing ethnic diversity. These are summarised below.

#### *Older people*

The subregion has a growing older population along with an increasing proportion of older people retiring without owning their home, requiring planning and delivery of housing options for the different life phases for older people:

- Older people with limited financial means require secure affordable rental accommodation

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- Small houses/units with single or two bedrooms for rental or purchase, (standalone, duplex, terraced, apartment options), as more older people seek to downsize.
- Alternative tenure options such as Abbeyfield – group of residents live independently in one house with some share spaces.
- Multi-generational options for extended families
- Retirement villages provided by private developers or community trust partnerships
- 'Rest home' facilities to provide care and support for people who are unable to remain living by themselves.
- Hospital level care and dementia care facilities.

Papakāinga housing for kaumatua Two submitters spoke to ways sale proceeds from TCC's Elder housing could be used to support elder housing options, one suggesting the sales proceeds that will come from sale of the Pitau Road Village in Mount Maunganui could be used for elder housing straight away, (Julie Andrews).

#### *Seasonal worker accommodation*

Julie Andrews noted the demand for seasonal worker accommodation in the Eastern Corridor and the ability of communities like Te Puke, Pongakawa, Paengaroa and Maketu rather than Tauriko to accommodate workers as they already have essential services, they have their own community identity and existing social infrastructure and networks. New Zealand Kiwifruit Growers indicated whilst the SmartGrowth strategy alludes to the importance of securing accommodation for seasonal workers near their job locations and essential services, specifics on how this will be realised are lacking. NZKGI is ready to actively participate in discussions.

#### *Suggestions on what is needed to address housing gaps in general:*

- Affordable rental housing
  - focus on longer term solutions such as social housing, incentives to build new affordable housing.
  - assisted rental
  - retained affordable to rent
- joint venture affordable housing developments
- retained affordable to purchase
- Increase home ownership – shared home ownership, rent to buy schemes, (e.g. facilitate access to central government funded programs)
- accessible homes for people with disabilities,
- provision of multi-generational households
- more options for single person households
- championing the needs of those most susceptible to housing stress and homelessness in the region, collaborate to end homelessness with a housing first approach
- Enable minor dwellings – rural landowners should be allowed to build an extra dwelling on their lots without resource consent, (Paul Hickson)

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*Suggestions provided in submission on 'the how' – ways to achieve housing outcomes:*

- Central government plays a crucial role in addressing homelessness with their offerings like emergency housing, transitional arrangements, and social housing. Priority should be given to collaborating with local entities, including councils and iwi, and adopting a community-centric approach to significantly alleviate housing challenges, (Scott Nicholson).
- The SmartGrowth Housing Action Plan Working Group should contain at least 50 % membership of people who are working in the housing development sector and can facilitate collaboration and advocacy for housing projects, (Christine Ralph).
- Provide regulatory support through RMA Plans for development incentives for permanent affordable housing throughout the community
- Government must lead development, incentives can lead to development in the right way and the right place (within the current urban areas), (Pauline Bennett).
- provide a breakdown of the target housing supply by location that must be met for rental and ownership by household size and price point.
- Develop Evidence-based Housing Plans: action plans grounded in solid data.
- Co-ordinated advocacy with other local authorities to the banking industry for less constrained lending for housing developments
- Co-ordinated advocacy with other local authorities to central government on the cost and supply streams for building products and a skilled construction workforce
- Purpose-built long-term rental accommodation is common in Europe and that there is interest in Europe in investing in this kind of accommodation in NZ, (Julie Andrews).

David Lucas spoke to addressing housing needs for all ethnic groups – There is a lot of emphasis on housing for Māori, that we live in a multi-cultural society with all ethnicities who live here deserving a home to live in.

Christine Ralph requested it is noted in the Strategy document that the adopted SmartGrowth Housing Action Plan 2020 actions have been incorporated into the subregional Housing Systems Plan. This submitter raised two additional issues relating to Housing at the Hearings on 4 and 5 December 2023:

1. Why the sub regional housing systems plan is waiting for the SmartGrowth Strategy rather than being an input.
2. Seeking an update on where the sub regional housing systems plan is at and is it the vehicle to pick up and address the issues raised, including demographic change and aging population.

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Discussion

The breadth of content from submitters reported in this section demonstrates the complexity of the housing system and the community's concern for, and passion about, the core human need and right that is housing. The submission themes are discussed below.

<b>Options overview</b>	
<b>Issue 1. Incorporate sustainability and accessibility standards in new homes</b>	
Option 1A	Note the submissions and make no changes.
<b>Issue 2. Use inclusionary zoning to achieve housing outcomes</b>	
Option 2A	Note the submissions and make no changes to the Strategy. Work with our central government partners and advocate to central government for clear direction on inclusionary zoning. Maintain a watching brief on Waikato Housing Initiative's inclusionary zoning work in their councils, (E.g. Hamilton, Waikato South, Waipa).
<b>Issue 3. Intensification in existing urban areas</b>	
Option 3A	Note the submissions and make no changes to the Strategy. No changes are proposed, as the balance between greenfields and intensification is a key platform of the SmartGrowth Strategy's connected centres programme.
<b>Issue 4. Role of local government</b>	
Option 4A	Note the submissions and make no changes to the Strategy. Strengthen integration and partnering between all players in the housing system (councils, central government, private market housing developers and builders, community housing providers, and social service providers) around their respective roles in housing planning and provision. This will be led by the Housing Action Working Group, as part of implementation, driving, and delivering on the sub regional Housing Systems Plan.
<b>Issue 5. Māori housing</b>	
Option 5A	Propose a new Housing System Growth Directive 8. <i>"District Plans, policies, toolkits and funding programs enable housing for Māori on whenua Māori and barriers to delivery are actively addressed."</i>
Option 5B	Note the submissions and make no changes.
<b>Issue 6. Social / community housing</b>	
Option 6A	Recommend change Growth Directive 6. From "Public housing supply is increased and aligns the typologies of new and existing housing stock to match the needs of the community."

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Option 6B	<p>To “6. Central government leads increase in public housing supply and aligns the typologies of new and existing housing stock to match the needs of the community.”</p> <p>Note the submissions and make no changes.</p>
<b>Issue 7. Strengthen the focus on housing outcomes in the Strategy.</b>	
Option 7A	<p>Update the housing systems challenges in the Strategy to note the changing ethnic diversity requiring different housing market responses (e.g. for more intergenerational living). The following text is recommended to be added to page 112 under ‘Key housing system challenges’, as a new housing challenge. It is best positioned between the 9<sup>th</sup> Challenge and 10th Challenge: <i>“Changing ethnic diversity in the sub region requires different housing market responses, (e.g., for multigenerational living).”</i></p> <p>Amend the existing Housing system growth directive 2. From “2. Deliver the place-based housing plan through collaboration and leadership,” to “2. Deliver the place-based housing plan through collaboration and leadership, including use of local impact investment, such as BOP Housing Equity Fund and via Quayside Holdings Ltd for example, to support delivery of social, affordable to rent and buy housing and housing on whenua Māori.</p> <p>Add a new Housing System Growth Directive 9 “Ensure place-based housing plans clearly respond to the needs of an older and more ethnically diverse population.”</p> <p>Add to the Strategy’s Housing Chapter; the Smartgrowth Housing Action Plan 2020 has been incorporated into the Draft sub regional Housing Systems Plan. The following text in italics is recommended, to go into Draft Strategy in housing chapter, at the end of this existing paragraph on p.111:</p> <p>The SmartGrowth Partners have developed a Sub-Regional Housing Systems Plan which brings together the key housing information for the western Bay of Plenty sub-region, identifies gaps, and lays out a clear Action Plan to improve the housing system in the sub-region, now and into the future. <i>The Sub-Regional Housing Systems Plan builds on the previous SmartGrowth Housing Action Plan 2020 and incorporates strategy that will lead to deliverable actions.</i></p>
Option 7B	Note the submissions and make no changes to the Strategy.
<b>Issue 8.</b>	
Option 8A	<p>Note the submissions and make no changes to the Strategy.</p> <p>Note the submission on developing a monitoring framework which tracks housing outcomes across the sub region. Refer the development of a monitoring and reporting framework for the sub regional housing systems plan to the Housing Action Group.</p>

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<b>Issue 1. Incorporate sustainability and accessibility standards in new homes</b>	
<b>Option 1A.</b> Note the submissions and make no changes to the Strategy.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>• Avoids creating unrealistic expectations that SmartGrowth can direct these standards in new housing.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>•</li> <li>• Does not respond to the issues raised by submitters</li> </ul>
<b>Financial implications</b>	
<b>N/A</b>	
<b>Other considerations</b>	
Directing sustainability and accessibility standards in new homes is outside SmartGrowth's remit. Opportunities to achieve these standards may be addressed in future changes to government regulations, for example accessibility standards via Building Code changes.	
<b>Issue 3. Intensification in existing urban areas</b>	
<b>Option 3A:</b> Note the submissions and make no changes to the Strategy. As the balance between greenfields and intensification is a key platform of the SmartGrowth Strategy's connected centres programme, no changes are proposed.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>• n/a</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>• Submitters may consider their issues have not been heard or addressed.</li> </ul>
<b>Financial implications</b>	
<b>N/A</b>	
<b>Other considerations</b>	
Central government has set policy direction, e.g., via NPS UD, which Tier 1 Councils are required to progress. This may not be well understood by the general community.	

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<b>Issue 4. Role of local government</b>	
<b>Option 4A:</b> Note the submissions and make no changes to the Strategy. Strengthen integration and partnering between all players in the housing system (councils, central government, private market housing developers and builders, community housing providers, and social service providers) around their respective roles in housing planning and provision. This will be led by the housing action working group, as part of implementation, driving, and delivering on the sub regional housing systems plan.	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Allows all stakeholders to work to one agreed plan</li> <li>Collaborative initiatives are best practice in addressing complex issues such as housing</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Collaborative approaches require ongoing resourcing to be successful</li> </ul>
<b>Financial implications</b>	
N/A	
<b>Other considerations</b> n/a	
<b>Issue 5. Māori housing</b>	
<b>Option 5A:</b> Develop a new Housing System Growth Directive 8. <i>District Plans, policies, toolkits, and funding programs enable housing for Māori on whenua Māori and barriers to delivery are addressed.</i>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Addressing barriers which District Plans, policies, out of date toolkits (e.g. Papakāinga Toolkit), a lack of funding create to stymy Māori housing are key to unlocking Māori housing outcomes</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Whilst this is a useful approach it does not guarantee improved funding Māori housing; funding for infrastructure provision and housing build.</li> </ul>
<b>Financial implications</b>	
N/A	
<b>Other considerations</b>	
-	
<b>Option 5B</b> Note the submissions and make no changes	

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<b>Advantages</b>	<b>Disadvantages</b>
• -	• Does not respond to the issues raised by submitters
<b>Financial implications</b>	
n/a	
<b>Other considerations</b>	
-	

**Issue 6. Social / community housing**

**Option 6A:** Change Growth Directive 6. from "Public housing supply is increased and aligns the typologies of new and existing housing stock to match the needs of the community."

To: 6. "Central government leads increase in public housing supply and aligns the typologies of new and existing housing stock to match the needs of the community"

<b>Advantages</b>	<b>Disadvantages</b>
• Provides clarity about roles in public housing provision	• n/a
<b>Financial implications</b>	
N/A	
<b>Other considerations</b>	
-	

**Option 6B** Note the submissions and make no changes

<b>Advantages</b>	<b>Disadvantages</b>
• -	• Does not respond to the issues raised by submitters
<b>Financial implications</b>	
n/a	
<b>Other considerations</b>	

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-	
<b>Issue 7. Strengthen the focus on housing outcomes in the Strategy.</b>	
<p><b>Option 7A:</b> Update the housing systems challenges in the Housing chapter of the Strategy to note the changing ethnic diversity requiring different housing market responses. . The following text is recommended to be added to page 112 under Key Housing System Challenges as a new Housing Challenge. This is best positioned in between the 9th and 10th challenges. <i>Changing ethnic diversity in the sub region requires different housing market responses, (e.g., for multigenerational living).</i></p> <p>Add a new Housing system growth directive "9. Ensure place-based housing plans clearly respond to the needs of an older and more ethnically diverse population."</p> <p>Amend the existing Housing system growth directive 2. From "Deliver the place-based housing plan through collaboration and leadership," to "Deliver the place-based housing plan through collaboration and leadership, including use of local impact investment, such as BOP Housing Equity Fund and via Quayside Holdings Ltd for example, to support delivery of social, affordable to rent and buy housing and housing on whenua Māori."</p> <p>Add to the Strategy's Housing Chapter; the SmartGrowth Housing Action Plan 2020 has been incorporated in the sub regional Housing Systems Plan. New text to go on p.111 at end of this paragraph as outlined in italics: SmartGrowth Partners have developed a sub-regional housing systems plan, which brings together the key housing information for the western Bay of Plenty sub region, identifies gaps, and lays out a clear action plan to improve the housing system in the sub region, now and into the future. <i>The sub regional Housing Systems Plan builds on the previous Smart Growth Housing Action Plan 2020 and incorporates strategy that will lead to deliverable actions.</i></p>	
<p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>• New growth directive speaking to older people and ethnically diverse groups' housing needs adds value to the Strategy as it recognises the diversity of housing needs.</li> <li>• Funding is a significant impediment to housing provision – providing detail on local funding options to pursue is relevant</li> </ul>	<p><b>Disadvantages</b></p> <ul style="list-style-type: none"> <li>• Funding is a significant impediment to housing provision – access to funding is not guaranteed</li> </ul>
<b>Financial implications</b>	
<b>N/A</b>	
<b>Other considerations</b>	
-	

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<b>Option 7B:</b> Note the submissions and make no changes	
<b>Advantages</b> <ul style="list-style-type: none"><li>n/a</li></ul>	<b>Disadvantages</b> <ul style="list-style-type: none"><li>Does not respond to the issues raised by submitters</li></ul>
<b>Financial implications</b>	
<b>Other considerations</b>	
<b>Issue 8. Develop monitoring and reporting framework for SmartGrowth sub regional Housing Systems Plan</b>	
<b>Option 8A:</b> Note the submission and make no changes to the Strategy. Refer the development of a monitoring and reporting framework for the sub regional housing systems plan to the Housing Action Group.	
<b>Advantages</b> <ul style="list-style-type: none"><li>It is good practice to ensure there is appropriate monitoring of any strategy, along with addressing gaps in implementation of strategy.</li></ul>	<b>Disadvantages</b> <ul style="list-style-type: none"><li>Developing this will require resourcing.</li></ul>
<b>Financial implications</b>	
<b>N/A</b>	
<b>Other considerations</b>	

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Sensitivity: General

<b>Recommended Decisions</b>
<b>Issue 1. Incorporate sustainability and accessibility standards in new homes</b>
<u>Option 1A.</u> Note the submissions and make no changes to the Strategy.
<b>Issue 2. Use inclusionary zoning to achieve housing outcomes</b>
<u>Option 2A.</u> Note the submissions and make no changes to the Strategy.
<b>Issue 3. Intensification in existing urban areas</b>
<u>Option 3A.</u> Note the submissions and make no changes to the Strategy.
<b>Issue 4. Role of local government</b>
<u>Option 4A.</u> Note the submissions and make no changes to the Strategy.
<b>Issue 5. Māori housing</b>
<u>Option 5A.</u> Include a new Housing System Growth Directive 8. <i>"District Plans, policies, toolkits and funding programs enable housing for Māori on whenua Māori and barriers to delivery are actively addressed."</i>
<b>Issue 6. Social / community housing</b>
<u>Option 6A.</u>
<b>Issue 7. Strengthen the focus on housing outcomes in the Strategy</b>
<p><u>Option 7A.</u> Update the housing systems challenges in the Strategy to note the changing ethnic diversity requiring different housing market responses The following text is recommended to be added to page 112 under 'Key housing system challenges', as a new housing challenge. It is best positioned between the 9<sup>th</sup> Challenge and 10<sup>th</sup> Challenge: <i>"Changing ethnic diversity in the sub region requires different housing market responses, (e.g., for multigenerational living).</i></p> <p>Add a new Housing System Growth Directive 9. <i>"Ensure place-based housing plans clearly respond to the needs of an older and more ethnically diverse population."</i></p> <p>Amend the existing Housing system growth directive 2. From <i>"2. Deliver the place-based housing plan through collaboration and leadership,"</i> to <i>"2. Deliver the place-based housing plan through collaboration and leadership, including use of local impact investment, such as BOP Housing Equity Fund and via Quayside Holdings Ltd for example, to support delivery of social, affordable to rent and buy housing and housing on whenua Māori.</i></p> <p>Add to the Strategy's Housing Chapter on p.111, the SmartGrowth Housing Action Plan 2020 has been incorporated into the sub regional Housing Systems Plan. <i>"The Sub-Regional Housing Systems Plan builds on the previous SmartGrowth Housing Action Plan 2020 and incorporates strategy that will lead to deliverable actions."</i></p>
<b>Issue 8. Develop monitoring and reporting framework for SmartGrowth sub regional Housing Systems Plan</b>
<u>Option 8A.</u> Note the submission and make no changes to the Strategy.

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Sensitivity: General

<b>Decision</b>
<i>(To be completed in the decision-making meeting)</i>
<b>Reason</b>
<i>(To be completed in the decision-making meeting)</i>

**Date approved:**  
**Approved by:**

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## SmartGrowth Housing System Group – Membership and Terms of Reference

### Members of the Housing System Group

<b>Members</b>	
John Holyoake	Western Bay of Plenty District Council (Chair)
Andrew Mead	Tauranga City Council
Annika Lane	Beca Limited
Brian Donnelly	Consultant
Carl Lucca	Tauranga City Council
Craig Batchelar	SmartGrowth Strategic Advisor (Interim)
Darren Toy	Kāinga Ora
Elva Conroy	SmartGrowth – Tu Pakari Kai Ārahi Advisor
Greg Simmonds	Priority One
Jacqui Ferrell	Tauranga Community Housing Trust
Jodie Rickard	Western Bay of Plenty District Council
John McDonald	Ministry of Housing & Urban Development
Matthew Lagerberg	Classic Group
Nichola Lennard	GMD Consultants / SmartGrowth Support
Nigel Smith	Accessible Properties Ltd
Steve Cutfield	Property Developers Forum
Simone Cuers	Western Bay of Plenty District Council
Te Pio Kawe	SmartGrowth – Tu Pakari Pou Ārahi Advisor
Terri Eggleton	Bay Trust
<b>Support</b>	
Nicola Delaney	SmartGrowth Support

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### SmartGrowth Housing System Group – Terms of Reference

<b>Membership:</b>	<ul style="list-style-type: none"> <li>• Chair – to be determined from the group or an independent person</li> </ul> <p>A representative from each organisation:</p> <ul style="list-style-type: none"> <li>• Accessible Properties Ltd</li> <li>• Kāinga Ora</li> <li>• Ministry of Housing &amp; Urban Development</li> <li>• Tāngata Whenua / Iwi Trusts</li> <li>• Tauranga Community Housing Trust</li> <li>• The local authorities (Tauranga City Council, Western Bay of Plenty District Council)</li> <li>• SmartGrowth Pou Arahi and/or Kai Arahi</li> <li>• Property Developers Forum representative</li> <li>• Other organisations such as Habitat for Humanity</li> <li>• Other members as co-opted from time to time</li> </ul> <p>Note: Substitute or alternate members are allowed. It is acknowledged that at times, more than one member from an organisation may be required.</p>
<b>Terms of reference:</b>	<ul style="list-style-type: none"> <li>• To continually analyse and update relevant housing need data and information</li> <li>• Understand housing issues and delivery strategies.</li> <li>• Develop a Housing Systems Plan that focuses on delivery actions in the next three to five years</li> <li>• An initial focus on the shorter-term challenges and strategies for social and affordable housing, but ultimately consider all housing needs across the housing continuum</li> <li>• Ensure linkages with other work underway (for example the Priority Development Areas and the Joint Spatial Plan)</li> <li>• Review implementations progress every 3 months and inform the SmartGrowth Senior Leaders Group of this and any other relevant matters</li> </ul>
<b>Meeting Frequency:</b>	Monthly or as and when required

04 08 2023



## Call Etiquette

### Microsoft Teams

Please refer to the Outlook calendar invite to access the meeting by ticking on the Microsoft Teams link provided.

**Video:** Please note, only participants who have speaking and voting rights are to have their cameras on.

**Hands up:** If you wish to speak, please utilise the “hands up” button.

**Say your name:** It’s hard to keep track of who is saying what. When you start talking, identify yourself, "This is Penelope, and I have a question," or "Hi, it's James, I'd like to add to that point."

**Use the mute button:** Even if you're in a quiet location, please ensure you are on mute.

**Silence isn't always golden:** Don't forget to unmute yourself when it's your time to talk.

**Test equipment:** Please test your equipment well before the meeting to ensure everything is working.

**On cell phones:** Make sure you have:

- A strong signal
- No interference
- Not too much background noise if you will be speaking

**On a computer**

- If you can, use a wired connection rather than Wi-Fi
- Make sure the computer camera works
- Make sure the speakers work
- Make sure the microphone works

Even if it says you're connected to the platform, make sure you actually are.

**Call quality:** Using a headset helps with sound quality for both you and others in the meeting.

**Being seen on video** is an important element of conference call etiquette. It's important for participants to use their video when speaking, or when indicating a desire to speak as this is helpful to the Chair in managing the meeting, accepting that this may not always be possible (e.g. if the connection is not great or you are in a rural location).

**Early Departure:** If you have to depart the meeting early, please advise the Chair.

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## **WBOP Housing Systems Placed Based Plan (Draft) 15.5.23**

### **What the housing system currently looks like in the Western Bay**

The Western Bay of Plenty is a desirable place to live. The population is increasing faster than the national average, and the sub-region currently has a housing shortage. People moving to the Western Bay will continue to create high demand for housing.

The Western Bay has a well documented issue with land supply for housing. The sub-region faces ongoing challenges with infrastructure investment and a complex regulatory environment. This sits alongside the national challenges around the cost of materials and labour which contribute to high housing costs.

The specific characteristics of the Western Bay housing system are:

1. There is limited new land supply for housing coming to market in the short to medium term.
2. Rents and house prices are among the highest in the country and are escalating faster than in other parts of the country.
3. The gap between median incomes and housing costs is widening.
4. More households are now in the 'intermediate' housing market and are unable to achieve home ownership through traditional means.
5. Increases in rent have led to a significant number of households being financially stressed.
6. Existing housing stock is being used for seasonal workers and temporary visitor accommodation. The impact of this is not well understood.
7. Homelessness and the demand for social housing is also growing.
8. In the short term, the planned delivery of social housing by Kāinga Ora and Community Housing Providers is low relative to need. The supply of social housing is starting from a lower base (less than 2% of total housing stock) than in other regions, and the development economics in the Western Bay sub-region make it challenging to deliver social housing projects.
9. The sub-region has an older population than other centres. This means household sizes overall are getting smaller. The housing typology doesn't match the changing household size.
10. However, the majority of market purchasers are not demonstrating a strong desire to "downsize". They are not yet seeing the value of living smaller but closer to services. There are examples of well designed and located one / two-bedroom units and attached dwellings selling well but concerns about smaller sections are often heard throughout the community. they are also more expensive to deliver. Many of the good examples that are being built are at the higher end of market prices.
11. It is imperative to build climate resilient communities, however Western Bay as a community does not yet recognise the benefits of the "15-minute neighbourhood", over the "quarter acre paradise".



12. There are limited examples and products for 'alternative tenures,' such as build-to-rent, co-housing, or shared ownership.
13. The long-term picture suggests intensification and some new greenfields will address the housing shortfall. However, it is not clear that this will address housing affordability. Under the current market dynamics, it is unlikely to.
14. Māori have worse housing outcomes than non-Māori.
15. There are significant opportunities to develop papakāinga on whenua Māori. These opportunities are difficult to realise. The overall planning for papakāinga on whenua Māori is not well advanced. Master planning, feasibility, infrastructure design and construction on whenua Māori requires significant investment to deliver housing over the next 10 years.
16. There are some significant pockets of sub-standard housing in the sub-region, with a wide range of negative impacts for households living in these conditions.
17. In the very short term, delivery of housing by the private sector is facing a downturn. This will have a flow-on effect on capacity to deliver as the economy improves. The current downturn in delivery by the private sector provides opportunities for social housing build as many developers are actively seeking to sell land currently, to Kāinga Ora and Community Housing Providers.

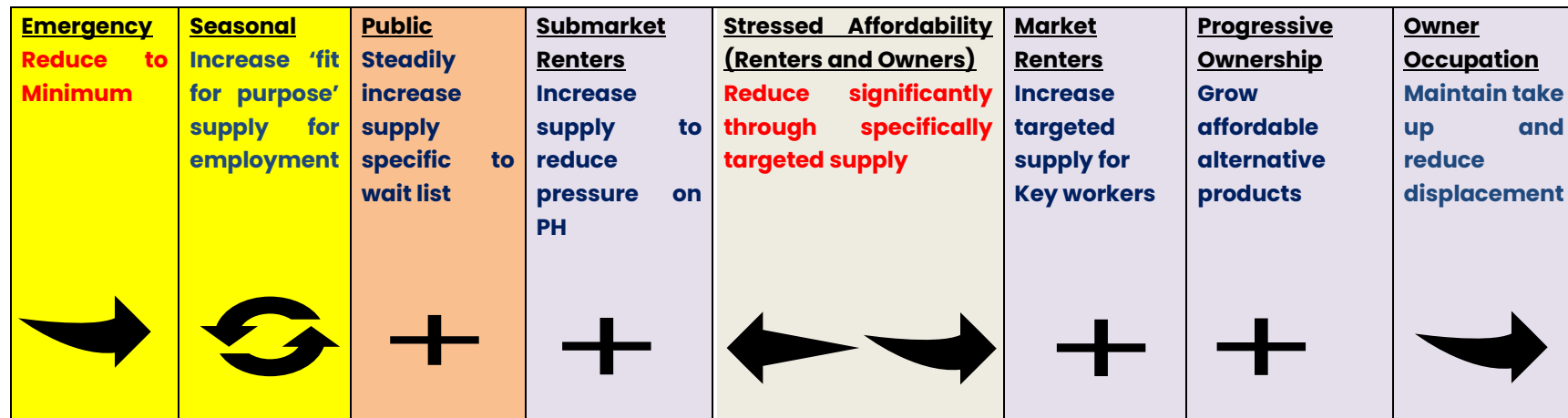
## **What the major impacts are:**

- Displacement of essential workers who can't afford to own or rent in the sub-region.
- Increasing number of older people needing affordable rental accommodation, with limited options in the private market.
- Ongoing decline in home ownership rates and increasing decline in home ownership rates for Māori.
- Continuing and increasing reliance on emergency housing special needs grants for those most affected by the lack of social housing and affordable rentals.
- Housing stock that continues to be mismatched to household sizes.

## Strategies

### Approach and Tactics for WBoP Housing System Placed Based Plan (focus on short term 0 to 3 years)

Our approach and tactics are about understanding in the short term what could make a difference if we focus resources in particular areas across the continuum.



Critical Strategies (0–3-year short term)	Elements for each strategy that will lead to deliverable actions	Lead	Priority / Timing
1) Leadership identified and equipped to drive delivery of the placed based housing plan through collaboration.  (Local leadership with all agencies, Iwi and private sector interests represented)	Establish a committed leadership group to enable and get actionable projects and programmes delivered	John Holyoake	
	Roles, responsibilities, and accountabilities are clearly defined and owned by key participants	All	
	Undertake stocktake of all projects currently committed that are delivering social and affordable outcomes and determine where they contribute to the key strategies.	MHUD	
	Monitoring and market intel function is in place to review and tweak progress as required	MHUD	

Critical Strategies (0–3-year short term)	Elements for each strategy that will lead to deliverable actions	Lead	Priority / Timing
2) Increase affordable housing supply targeted to stressed households – renters (submarket and market), alternative tenures, progressive ownership (Kiwibuy wider Govt build programmes) and Iwi	Develop medium term plan (3 to 10 years) once majority of short-term actions are underway		
	Track & monitor progress of all strategies for the WBoP system plan		
	Grow development capability and capacity of CHPs and Iwi to introduce and implement affordable supply across rental, ownership and alternative tenure options.		
	Specific new project opportunities to be identified and progressed with funding support from AHF, Build Ready, Kiwibuild, WKWO, PHO, Papakainga TPK, and BOP Housing Equity Fund depending on the deliverables.		
	Developments where possible to deliver 1- and 2-bedroom new housing supply for targeted (singles / elderly need) – utilise BTR, BoP Equity Fund, AHF		
	Introduce Kiwibuy programmes to attract market renters into ownership (new and existing purchase) – utilise established products such as First Home Partner, Housing Foundation, HFH, and YouOwn		
	Increase supply and take up of mature adult retirement (affordable rent and ownership) LTO villages to free up existing housing for market options – innovation required		
	Identify and address barriers to accessing products such as shared ownership programme, such as ensuring products are user friendly, fit for purpose and are well understood in the market.		
3) Urgently reduce households being housed in unsatisfactory emergency accommodation	Secure control of selective motels and reconfigure for end intended use – (i.e. short-term transition and more permanent tenures).	MHUD	
	Establish program to prioritise placement of households in emergency accommodation, (motels, backpackers and Covid motels) into social housing placements via APL, Kainga Ora and Community Housing Providers. Use the homeless taskforce Kāinga Tupu to achieve this. MHUD commits resources to reduce risk for social housing providers to enable placements of people with complex needs.	APL, Kāinga Ora, CHPs, Kāinga Tupu with	

Critical Strategies (0–3–year short term)	Elements for each strategy that will lead to deliverable actions	Lead	Priority / Timing
		support from MHUD and MSD	
	Healthy homes retrofits of sub-standard housing via increasing support for Twenty Degrees Programme and iwi-led initiatives to improve existing housing.		
4) Increase public housing supply steadily to align typologies of new and existing stock to better match needs.	MHUD and MSD to urgently review the waitlist and emergency housing registers, along with accommodation supplement trends, to determine how quickly local demand is increasing and inform better targeting of matched accommodation to need.	MHUD, MSD	
	Develop a social housing delivery plan for sub region based on findings of review above.		
	Support CHPs to implement known development plans in Gate Pa / Pukehinahina and Te Puke, which deliver 1 and 2-bedroom typologies		
	KO to increase their short-term pipeline of new build house supply through either purchase of land and building or turnkey purchase from private developments already underway.	KO	
	Accessible (APL), KO, and MHUD to structurally review status of agreements and funding lines to establish a path forward that accelerates the better utilisation and supply of the current public housing stock owned by APL.		
5) Increase provision of fit-for-purpose seasonal and visitor accommodation.	Ensure planning rules enable RSE accommodation on underutilized brownfields and employer land		
	Attract investment and initiate delivery of new tourist accommodation		
	Encourage growers to provide medium term 'fit for purpose' accommodation – and reduce dependency on needing to displace other rental accommodation and motel beds.		

Critical Strategies (0–3-year short term)	Elements for each strategy that will lead to deliverable actions	Lead	Priority / Timing
6.) Lead intensification projects incorporating a mix of tenures and typologies, that demonstrate intensification done well.	Work with TCHT and APL in Pukehinahina and Te Puke on projects that demonstrate intensification done well.		
	Private developers to utilise HUD and KO products such as 'Build Ready' and 'KiwiBuild' to enable demonstration projects of intensification to be underwritten – particularly on the Te Papa peninsula.		
	Kāinga Ora to instigate projects for social or affordable using as demonstration projects to illustrate what's possible, in the knowledge they may not meet their normal investment thresholds.	Kāinga Ora	
7) Iwi, hapū and Māori land trusts housing / Papakāinga aspirations on whenua Māori are supported and realised	Actively support Te Ihu o Te Waka's development planning on whenua Māori so that once planning is completed, Papakāinga delivery can occur and a 20-year pipeline of housing across the rohe is identified for funding. This includes funding applications to Whai Kāinga Whai Oranga as well as access to other funding to advance Māori housing outcomes.		
	Actively support Ararau Tangata in Tauranga Moana to progress their development projects on whenua Māori.		
	Engage with hapū on specific needs and identify partnership opportunities between central government and iwi / hapū to deliver affordable housing that meets the needs of Māori. (I.e. Not on whenua Māori but within other housing developments).		
	Provide ongoing funding support for capability and capacity building for iwi and hapu, including funding for professional services such as project managers, planners, urban designers/architects and development engineers.		
8) Proactively support interfaces with established programmes and initiatives across the rohe that impact or can influence the delivery of social and affordable housing outcomes	<b>For Smartgrowth PDA's</b> <ul style="list-style-type: none"> <li>- Support each growth project to ensure steady supply of land long term for affordable housing intended outcomes.</li> <li>- Track implementation of the business case and development outcomes for Tauriko west, Omokoroa – track consents, infrastructure and use best endeavours to include provisions for affordable housing into rollouts.</li> </ul>		

Critical Strategies (0–3–year short term)	Elements for each strategy that will lead to deliverable actions	Lead	Priority / Timing
	<ul style="list-style-type: none"> <li>- Develop Business case for Te Kainga – include provisions for public, affordable rental and ownership, 15 min LWP community, confirm level of central Govt procurement and methodology to progress.</li> </ul>		
	<b>Assist TCC with other potential strategic land use initiatives</b> – such as Smiths Farm and Parau Farms to specifically incorporate social and affordable supply of housing		
	<b>For Te Puke Housing Placed Based Plan</b> <ul style="list-style-type: none"> <li>- Support the housing network established in Te Puke and assist with the growth and project initiatives already identified and underway.</li> <li>- Track &amp; monitor progress and ensure alignment with strategies for the WBoP system plan.</li> </ul>		
	<b>For Katikati Housing Placed Based Plan</b> <ul style="list-style-type: none"> <li>- Support the housing network about to start work in Katikati and assist with identified growth and project initiatives.</li> <li>- Track &amp; monitor progress and ensure alignment with strategies for the WBoP system plan.</li> </ul>		

Sensitivity: General

# SmartGrowth Strategy 2023–2073

## ISSUES AND OPTIONS PAPER

### General

**Author: Craig Batchelar**

Topic	Parts 1 & 2 and General
<b>Issues</b>	<ol style="list-style-type: none"> <li>1. Oppose</li> <li>2. Changes to Vision – other UGPs</li> <li>3. Changes to Vision – Tangata Whenua values</li> <li>4. Objectives, Challenges, Opportunities</li> <li>5. Transformational Shifts</li> <li>6. Implementation Plan – specific actions to be included.</li> <li>7. Consultation &amp; Engagement</li> <li>8. SmartGrowth Partnership</li> <li>9. Hamilton to Tauranga Corridor</li> </ol>

### Staff Narrative

#### Overview of feedback received

12 submitters generally support the Strategy. No further evaluation of these submissions is necessary.

#### **Issue 1: Oppose the Strategy**

22 submitters generally oppose the Strategy. Four submissions in this category include a request to rationalise SmartGrowth, TSP, UFTI documents into a united framework with consistent figures; provide for more public consultation; revisit the growth scenario based on population ageing and workforce decline, stop planning too far ahead; and work more closely with the development community.

#### **Issue 2: Changes to Vision based on other UGP Strategies**

SocialLink has proposed changes to the Vision to reflect contemporary perspectives – based on other UGP visions.

#### **Issue 3: Changes to Vision to reflect tangata whenua values**

SocialLink has proposed including tangata whenua values on page 61 of the Strategy into the Vision statements on page 16.

#### **Issue 4: Objectives (page 17), challenges and opportunities (pages 38–40)**

National Council of Women propose that Population Change be included as a challenge. Envirohub submit that the deteriorating state of the environment and the loss of biodiversity be added as a challenge and that the Opportunities should note the high level of active awareness there is of the natural environment. Envirohub also propose that Social Objectives on page 17 do not include any focus on people. This should be developed and include a statement on equitable outcomes.

#### **Issue 5: Transformational Shifts**

The Property Council, Urban Taskforce and Clear the Air and Tauranga Moana Fumigant propose adding further transformational shifts to prioritise social infrastructure and access to public amenities, environmental and climate resilience, protecting highly productive land and Mount Maunganui airshed pollution.

#### **Issue 6: Implementation & Funding Plan – Specific Actions**

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Two submitters (Urban Task Force and Property Council) propose a range of funding and financing models in the implementation plan, including using the Infrastructure Funding and Financing Act, Public Private Partnerships and direct Central Government investment.

Two submitters (SBOP and Julie Andrews) do not support public private partnerships and funding should be through central government.

SocialLink also opposes the use of the IFF.

Ngai Tukairangi Trust request that SmartGrowth consider mechanisms to assist hapu in the sub-region to develop their own spatial plans and revise/update existing planning documents.

Urban Task Force requests actions in the implementation plan to include a requirement for partners to collaborate and to reach solutions using a taskforce/working group, require review of delivery and cooperation between the Partners and their performance, engage more with the development community and implement National Planning Standards for 'industrial' zones.

Other specific suggestions are that the development Sector Group (DSG) should be formally included in the SmartGrowth structure, with representation on the SmartGrowth Leadership Group; that a full Project Plan and Resourcing Plan be prepared for the FDS and that a SmartGrowth / FDS Implementation Office be established with adequate funding and resources to deliver the FDS.

#### **Issue 7: Consultation and Engagement**

Key themes are that the opinions and viewpoints of the general community have not been allowed for in the month-long SCP process and the amount of information could be quite off-putting.

#### **Issue 8: SmartGrowth Partnership**

The focus of these submissions are on the reestablishment of the SmartGrowth Forums, in particular the Strategic Partners Forum and that representatives from the Social and Environment Sector and KiwiRail be included on the SmartGrowth Governance Group (SLG) Note that the DSG has also requested representation on the SLG.

#### **Issue 9: Hamilton to Tauranga Corridor**

A submission by SmartGrowth seeks inclusion of the Hamilton to Tauranga Investment Programme in the Strategy.

Waikato and Bay of Plenty regions are working on a joined-up approach to the Hamilton to Tauranga Corridor given the significance of this connection. There are shared objectives and priorities, and a joint investment programme has been prepared. The joint investment programme is based around fuelling sustainable economic growth for New Zealand by highlighting the national importance of this strategic corridor which connects export industries through the Ports of Tauranga and Auckland and inland ports.

The recently notified Future Proof FDS includes the same provisions.

### **Options Overview**

**Issue 1:** Oppose elements of the Strategy and propose to rationalise the SG, TSP and UFTI documents, revisit the growth scenario, work more closely with the development sector.

Option 1A	Note the submissions and make no changes to the strategy. (Recommended)
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Option 1B	Rationalise SmartGrowth, TSP, UFTI documents into a united framework with consistent figures. Revisit the growth scenario.(Not Recommended)
<b>Issue 2:</b> Changes to Vision to reflect contemporary perspectives – based on other UGPs	
Option 2A	That the vision for the strategy is retained as per the version released for consultation (Recommended)
Option 2B	Change the Vision to reflect contemporary perspectives as follows: <ul style="list-style-type: none"> <li>• 'Liveable, safe, sustainable and healthy place.'(Greater Christchurch); and/or</li> <li>• A diverse and vibrant city centre, thriving towns and rural communities, place of choice, variety of housing options, protection of natural environments, landscape and heritage, productive partnerships, sustainable infrastructure and resource use, responds to climate change urgently, building resilience and supporting the transition to low carbon economy (Future Proof Strategy, Waikato)</li> </ul>
<b>Issue 3:</b> Incorporating the values expressed by tangata whenua on pg 61 of the Strategy into the vision.	
Option 3A	Incorporate the following values from page 61 into the Strategy Vision on page 16 "Manaakitanga – respect and care for others: We build warm and affordable homes and communities for all socioeconomic backgrounds. We also are good ancestors who plan and make decisions for our mokopuna and future generations. Kaitiakitanga – environmental responsibility and reciprocity: We are dependent on the natural world for their well-being and survival and therefore have a responsibility to care for and protect the environment in return. We are good ancestors who leave the natural environment in a better state for our mokopuna and future generations. Environmental reciprocity involves moving away from an exploitative mindset and creating a more balanced relationship between human activity and nature to ensure the health and wellbeing of all."
Option 3B	Do not incorporate the following values from page 61 into the Strategy Vision on page 16 "Manaakitanga – respect and care for others: We build warm and affordable homes and communities for all socioeconomic backgrounds. We also are good ancestors who plan and make decisions for our mokopuna and future generations. Kaitiakitanga – environmental responsibility and reciprocity: We are dependent on the natural world for their well-being and survival and therefore have a responsibility to care for and protect the environment in return. We are good ancestors who leave the natural environment in a better state for our mokopuna and future generations. Environmental reciprocity involves moving away from an exploitative mindset and creating a more balanced relationship between human activity and nature to ensure the health and wellbeing of all."

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<b>Issue 4: Objectives</b> – proposed additions to page 17 and Challenges and Opportunities– pages 38–40	
Option 4A	Change the Strategy Challenges, Opportunities and Objectives to reflect the following. Include Population Change and Deteriorating State of the Environment and Loss of Biodiversity as new Challenges on page 38. Add “high level of active awareness there is of the natural environmental from most of our citizens” to opportunities on page 40. Add a statement on equitable outcomes to the social objectives on page 17.
Option 4B	No changes to the Strategy Challenges, Objectives and Opportunities
<b>Issue 5: Transformational Shifts:</b> Proposed changes to transformational shifts	
Option 5A	Add a seventh transformational shift to reflect further investment in social infrastructure such as public and community amenities, noting the significant underinvestment in such infrastructure. Expand the proposed eco-system ‘transformational shift’ to include environmental and climate resilience. Incorporate the economic imperative to protect the region’s highly productive land within the transformational shifts. Add resolving Mount Maunganui Airshed pollution to the transformational shifts.
Option 5B	Make no changes to the Transformational Shifts
<b>Issue 6: Implementation &amp; Funding Plan – Specific Actions to be Included</b>	
Option 6A	That the requested actions be noted and referred to the Implementation and Funding Plan Working Group for consideration
<b>Issue 7: Consultation &amp; Engagement:</b> Key themes are that the opinions and viewpoints of the general community has not been allowed for in the month-long SCP process and the amount of information could be quite off-putting.	
Option 7A	Note the submissions on the Strategy consultation and engagement process and consider these suggestions for future SmartGrowth consultation processes.
<b>Issue 8: SmartGrowth Partnership:</b> The focus of these submissions is on the reestablishment of the SmartGrowth Forums, in particular the Strategic Partners Forum and that representatives from the Development Sector Group, Social and Environment Sector and KiwiRail are included on the SmartGrowth Governance Group (SLG). Also engaging early with the Priority Development Areas process.	
Option 8A	The matters raised in relation to membership of the SmartGrowth Leadership Group and re-establishment of the SmartGrowth Forums are referred to SLG for its consideration alongside the development of a Communications and Engagement Plan that will take the SG programme through implementation of the Strategy and lead up to a review in 2027
<b>Issue 9: Hamilton to Tauranga Corridor:</b> A submission by SmartGrowth seeks in inclusion of the Hamilton to Tauranga Investment Programme in the Strategy. Waikato and Bay of Plenty regions are working on a joined-up approach to the Hamilton to Tauranga Corridor given the significance of this connection. There are	

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<p>shared objectives and priorities, and a joint investment programme has been prepared. The joint investment programme is based around fuelling sustainable economic growth for New Zealand by highlighting the national importance of this strategic corridor which connects export industries through the Ports of Tauranga and Auckland and inland ports.</p>	
Option 9A	Include the Hamilton to Tauranga Investment Programme in the SmartGrowth Strategy.

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<b>Issue 1: Oppose elements of the Strategy and propose to rationalise the SG, TSP and UFTI documents, revisit the growth scenario, work more closely with the development sector.</b>	
<b>Option 1A:</b> Note the submissions and make no changes. Note that the growth scenario evidence base has undergone significant expert analysis and will be revisited in the next iteration of the Strategy in a few years' time. The Strategy incorporates the UFTI connected centres programme and key elements of the TSP programme. SmartGrowth advisors regularly report to the Development Sector Group which is s considered to be a key SmartGrowth stakeholder. (Recommended)	
<b>Advantages</b> <ul style="list-style-type: none"> <li>The Strategy has incorporated the key elements of UFTI and TSP.</li> <li>The growth scenarios are evidence-based using most recent demographic and economic analysis and an updated HBA. It is not clear on what basis that this would provide any clearer evidence base.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Would not address the submitters issues.</li> </ul>
<b>Financial implications</b>	
Nil	
<b>Other considerations:</b>	
The Strategy Background and SmartGrowth Journey sets out how the TSP and UFTI and JSP provide the evidence base for the Strategy and FDS. This development of policy is also addressed in the Urban Form and FDS IOPs. Once the Strategy is adopted the UFTI will become a background document that would only need to be referenced in decision-making where the direction provided within the Strategy was absent or unclear.	
<b>Option 1B:</b> Rationalise SmartGrowth, TSP, UFTI documents into a united framework with consistent figures. Revisit the growth scenario. (Not Recommended)	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Rationalise SG, TSP, UFTI – provides an opportunity to ensure numbers are consistent across the documents, and further stakeholder inputs.</li> <li>Revisit growth scenario based on population ageing and workforce decline, stop planning too far ahead –More granular population data on aging has been recognised as beneficial in other IOPS. A shorter timeframe would provide greater certainty but would not support the need for long term 30-year planning required by the FDS</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>The Strategy has incorporated the key elements of UFTI and TSP.</li> <li>The growth scenarios are evidence-based using most recent demographic and economic analysis and an updated HBA. It is not clear on what basis that this would provide any clearer evidence base.</li> </ul>

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<b>Financial implications</b>	
A revisit of these projections would be costly and time-consuming. There is no budget allocation for this.	
<b>Other considerations:</b>	
Nil	
<b>Issue 2: SocialLink requests changes to Vision to reflect contemporary perspectives – based on other UGPs</b>	
<b>Option 2A:</b> That the vision for the strategy is retained as per the version released for consultation (Recommended)	
<b>Advantages</b> <ul style="list-style-type: none"> <li>The current vision of “A great place to live learn work and play” captures the multi-faceted nature of the Strategy. It reflects the shift away from a singular focus on land for housing which characterised urban growth planning prior to SmartGrowth.</li> <li>Read as a whole, the Strategy includes consideration of contemporary perspectives referred to in the submission.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>The vision does not reflect contemporary perspectives upfront, such as the priority to climate change response.</li> </ul>
<b>Financial considerations:</b>	
Nil	
<b>Other Considerations:</b>	
The need for an updated vision could be reconsidered at the next review of the Strategy (2027).	
<b>Option 2A:</b> Change the Vision (“A great place to Live, Learn, Work Play”) to reflect contemporary perspectives such as: <ul style="list-style-type: none"> <li>• ‘Liveable, safe, sustainable and healthy place.’(Greater Christchurch); and/or</li> <li>• A diverse and vibrant city centre, thriving towns and rural communities, place of choice, variety of housing options, protection of natural environments, landscape and heritage, productive partnerships, sustainable infrastructure and resource use, responds to climate change urgently, building resilience and supporting the transition to low carbon economy (Future Proof Strategy, Waikato)</li> </ul>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>These suggestions could better reflect contemporary perspectives.</li> </ul>	<b>Disadvantages</b>
<b>Financial considerations:</b>	

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The Vision has already gone through a consultation process through key SmartGrowth stakeholders and Partnership. The time taken to reconsider the vision needs to be weighed up against the cost and risk of delay in adopting the final Strategy. With limited resources the focus should be substantive outputs.	
<b>Other Considerations</b>	
<b>Issue 3: Incorporating the values expressed by tangata whenua on pg 61 of the Strategy into the vision.</b>	
<b>Option 3A:</b> Incorporate the following values from page 61 into the Strategy Vision on page 16 "Manaakitanga – respect and care for others: We build warm and affordable homes and communities for all socioeconomic backgrounds. We also are good ancestors who plan and make decisions for our mokopuna and future generations. Kaitiakitanga – environmental responsibility and reciprocity: We are dependent on the natural world for their well-being and survival and therefore have a responsibility to care for and protect the environment in return. We are good ancestors who leave the natural environment in a better state for our mokopuna and future generations. Environmental reciprocity involves moving away from an exploitative mindset and creating a more balanced relationship between human activity and nature to ensure the health and wellbeing of all." (Not recommended)	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Including these tangata whenua values in the Vision statement may resonate more with iwi/hapu/whanau than the current Vision statement</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>These values are already incorporated into the Strategy on page 61.</li> <li>Read as a whole, the Strategy includes consideration of these values.</li> </ul>
<b>Financial implications</b>	
Time and cost required to consult with on a revised vision for this Strategy. The time taken to reconsider the vision needs to be weighed up against the cost and risk of delay in adopting the final Strategy. With limited resources the focus should be substantive outputs.	
<b>Other considerations</b>	
The need for an updated vision could be reconsidered at the next review of the Strategy (2027).	
<b>Option 3B:</b> Do not incorporate the tangata whenua values and note that these values are already incorporated into the Strategy on page 61. (Recommended)	

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<b>Advantages</b> <ul style="list-style-type: none"> <li>These values are already incorporated into the Strategy on page 61. Read as a whole, the Strategy includes consideration of these values.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Lost opportunity to incorporate tangata whenua values into the Vision statement.</li> </ul>
<b>Financial implications</b>	
<b>Other considerations</b>	
The need for an updated vision could be reconsidered at the next review of the Strategy (2027).	
<b>Issue 4: Objectives – page 17 and Challenges and opportunities– pages 38–40</b> <ul style="list-style-type: none"> <li>National Council of Women propose that Population Change be included as a challenge.</li> <li>Envirohub submit that the deteriorating state of our Environment and the Loss of Biodiversity be added as a challenge</li> <li>Envirohub submits that the Opportunities should note the high level of active awareness there is of the natural environmental from most of our citizens.</li> <li>Envirohub propose that Social Objectives on page 17 do not include any focus on people. This should be developed and include a statement on equitable outcomes.</li> </ul>	
<b>Option 4A:</b> Change the Strategy Challenges, Opportunities and Objectives to reflect the following. Add “high level of active awareness there is of the natural environmental from most of our citizens” to opportunities on page 40. Add a statement on equitable outcomes to the social objectives on page 17. (Recommended)	
<ul style="list-style-type: none"> <li><b>Advantages</b></li> <li>Recognises the community’s active participation in the environment.</li> <li>Places emphasis on this outcome which is consistent with the Strategy’s Vision.</li> </ul>	<ul style="list-style-type: none"> <li><b>Disadvantages</b></li> <li>Population change and impact of growth (including maps) is already covered in detail on pages 33–37 and is the overarching challenge and the basis for a Strategy that deals with planning for growth. Challenge 6 already covers deteriorating state of the environment and loss of biodiversity.</li> </ul>
<b>Financial implications</b>	
Minor	
<b>Other considerations</b>	

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<p>Population Change and Deteriorating State of the Environment and Loss of Biodiversity are addressed in other IOPS: Social Infrastructure Transport, Urban Form and FDS.</p> <p>A commentary equitable outcomes is included in the Social Infrastructure IOP. The essential issues is that each community has a different starting point in terms of what is currently provided and their priorities, demographics and deprivation profile. While the strategy sets the intent of what we want to achieve, how we achieve it on the ground might be different from community to community.</p>	
<p><b>Option 4B:</b> No changes to the Strategy Challenges, Objectives and Opportunities (Not recommended)</p>	
<p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>Population change and impact of growth (including maps) is already covered in detail on pages 33-37 and is the overarching challenge and the basis for a Strategy that deals with planning for growth. Challenge 6 already covers deteriorating state of the environment and loss of biodiversity.</li> <li>R</li> </ul>	<p><b>Disadvantages</b></p> <ul style="list-style-type: none"> <li>Lost opportunity to enhance the Strategy by including these changes.</li> </ul>
<p><b>Financial implications</b></p>	
<p>Nil</p>	
<p><b>Other considerations</b></p>	
<p>Nil</p>	
<p><b>Issue 5: Changes to Transformational Shifts:</b></p> <p>The Property Council of NZ submits that SmartGrowth undertakes work to further refine the 'transformational shifts' for change as follows:</p> <ul style="list-style-type: none"> <li>Greater consideration of access to public amenities and by extension the development of thriving communities. Access to public amenities and community has been affected by historic underinvestment across the region and should be considered with the 'transformational shifts'.</li> <li>expanding the proposed eco-system 'transformational shift' to include environmental and climate resilience, especially in light of this year's extreme weather events.</li> <li>notes the ongoing economic imperative to protect the region's highly productive land within the proposed shifts and wish to also see this incorporated within the framework.</li> </ul> <p>The Urban Taskforce proposes a seventh shift, this being the need for further social infrastructure such as public and community amenities to be recognized. The reason for this is that there has been significant underinvestment in such infrastructure by successive councils in Tauranga, and the city remains in "catch up mode". This is also noted by the Bell Road Limited Partnership.</p>	

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Clear The Air & Tauranga Moana Fumigant note that resolving Mount Maunganui Airshed pollution has to be a priority that is at least equal to those identified, because it addresses real human health risks.

**Option 5A:**

Add a seventh transformational shift to reflect further investment in social infrastructure such as public and community amenities, noting the significant underinvestment in such infrastructure.

Expand the proposed eco-system 'transformational shift' to include environmental and climate resilience.

Incorporate the economic imperative to protect the region's highly productive land within the transformational shifts.

Add resolving Mount Maunganui Airshed pollution to the transformational shifts.

(Not Recommended)

**Advantages**

- Adding a further transformational shift on social infrastructure and public amenities is consistent with the "live, work, play" vision.
- Expanding the proposed eco-system 'transformational shift' to include environmental and climate resilience would provide further context to this shift and emphasizes the importance of climate resilience.
- Incorporating the economic imperative to protect the region's highly productive land within the transformational shifts will highlight the statutory requirement under the NPS-HPL.
- Resolving Mount Maunganui Airshed pollution is a significant issue of public concern.

**Disadvantages**

- There is a section in the Strategy focusing on key social infrastructure and well-being challenges, with a comprehensive list of growth directives . The delivery of social infrastructure is a core component of councils' delivery and already addressed adequately in the Strategy and through delivery mechanisms such as LTPs.
- The importance of environment and climate resilience is covered in detail throughout the Strategy – in particular in Part 3, chapters 1, 3 and 4. The Strategy includes climate resilient development principles which are integrated into the connected centres programme. As a fundamental set of Strategy principles this is already included as business as usual and does not need a separate transformational shift.
- Protect the region's highly productive land is already a statutory requirement this should be business as usual in planning, has already been taken into account in the Spatial Plan mapping and not a transformational shift in this context.
- This Mount Maunganui Airshed issue has been raised as part the Mount to Arataki Spatial Plan. The Strategy is not the most appropriate place to be dealing with specific and detailed planning issues other than providing a framework for aligning such matters with the Strategy direction. The need for separation between

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	industrial land use and sensitive areas is already recognised in existing regional and district plans and isn't a transformational shift.
<b>Financial implications</b>	
Minor	
<b>Other considerations</b>	
The purpose of the transformational shifts is to identify areas that are not "business as usual" components, to reflect the areas that require focussed attention to bring about change.	
<b>Option 5B: Make no changes to the Transformational Shifts (Recommended)</b>	
<b>Advantages</b> <ul style="list-style-type: none"> <li>The existing transformational shifts identify critical areas of intervention that are not "business as usual" components and reflect the areas that require particular attention to bring about change.</li> <li>A greater number of transformational shifts would detract from the focus and increase complexity, with limited benefit.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Submitters may consider that important issues have not been given sufficient attention, and that their issues are not in fact "business as usual".</li> </ul>
<b>Financial implications</b>	
Minor	
<b>Other considerations</b>	
The need for an updated Transformational Shifts could be reconsidered at the next review of the Strategy (2027) considering whether the areas of focus for transformation have become "business as usual" and to address any new and emerging critical issues.	
<b>Issue 6: Implementation and Funding and Financing Plan – Specific Actions to be Included</b> Classic, Fordland and Tumu Kaituna 14 Trust submit that there should be more developer input with a specific request from Fordland and Tumu Kaituna 14 Trust for a SmartGrowth / FDS Implementation Office be established with adequate funding and resources to deliver the FDS. Urban Task Force submits that actions should be included as follows: <ul style="list-style-type: none"> <li>Require Regional &amp; District Councils to collaborate and to reach solutions using a taskforce/working group tasked with identifying and implementing solutions to unlock land in a timely and efficient manner.</li> <li>Require review of delivery and cooperation between the Partners and their performance.</li> <li>Developers engaging with the Priority Development Areas process.</li> </ul>	

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<p>Property Council advocates for targeted rates, user-pays systems, and Special Purpose Vehicles ("SPVs") as enabled under the Infrastructure Funding and Financing Act ("IFF") and continued advocacy from SmartGrowth and its partners for greater central government investment in development enabling infrastructure.</p> <p>The Urban Taskforce supports a range of different funding and finance models including options for public-private partnerships (PPPs). The Urban Taskforce also supports the use of the IFF Act with respect to the funding of infrastructure and greater Central Government investment.</p> <p>Two submitters (SBOP and Julie Andrews) do not support public private partnerships and funding should be through central government. SBOP also opposes the use of the IFF.</p> <p>Ngai Tukairangi Trust would like the SGS to better fund an implementation programme that assists hapu in the sub-region to develop their own spatial plans or revise and update existing planning documents.</p>	
<p><b>Option 6A</b></p> <p>That the requested actions be noted and referred to the Implementation and Funding Plan process for consideration (Recommended)</p>	
<p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>The submission points are implementation issues that do not need to be included in the Strategy.</li> <li>Consideration in the formulation of the Implementation and Funding Plan will ensure that these suggestions are not "lost"</li> </ul>	<p><b>Disadvantages</b></p>
<p><b>Financial implications</b></p>	
<p>Minor</p>	
<p><b>Other considerations</b></p>	
<p>Some issues concern resourcing and the quality of delivery (collaboration, review, stakeholder engagement) that need to be addressed in the overall leadership and management of SmartGrowth.</p>	
<p><b>Issue 7: Consultation and Engagement</b></p> <p>Key themes are that the expression of opinions and viewpoints of the general community has not been sufficiently allowed for in the month-long SCP process and the amount and complexity of information is a barrier to engagement.</p> <p>Several submissions suggest ways to improve engagement.</p> <p>Beth Bowden proposes that in the absence left by the SmartGrowth Forums, some combined consultative workshops could bring together various compulsorily consulted parties with community-based experts across a range of fields. The structure of the online survey could mirror that of the Strategy Document itself as there is an apparent internal logic to the "story" of the Strategy. The survey's approach encourages a single-issue response from submitters.</p>	

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SBN proposes consultation process should:

- 1) Offer a guided written submission process (including multi-choice answers where appropriate) for people who want to share their views but don't have the knowledge of time or writing skills to type up responses for each section.
- 2) Still also offer the comment boxes, for people to add any extra wording they wish.
- 3) Run a community engagement session in each part of the sub-region, to get wider feedback and support the needs of people who respond better through group sessions and/or oral language, including many Tangata Whenua, some other ethnic groups, some people with disabilities, and many others who respond better in groups settings where other people bring up ideas and stimulate innovative thinking and shared solutions.

**Option 7A:** Note the submissions on the Strategy consultation and engagement process and consider these suggestions for future SmartGrowth consultation processes through an action in the Implementation and Funding Plan to prepare an updated Communications and Engagement Plan that will take the SG programme through implementation of the Strategy and lead up to a review in 2027. (Recommended)

#### Advantages

- The Statutory requirements for the SCP have been met.
- Further consultation on implementation of aspects of the Strategy will be undertaken through Council plans such as the LTP, RLT and through targeted actions under the Implementation and Funding Plan
- Noting these suggestions acknowledges the need for enhanced community engagement in future SmartGrowth processes and directs further discussion on the points raised by submitters.
- Providing for more public consultation in future would enable the wider community to be more engaged in the process and provide for more targeted engagement (e.g youth, Tangata Whenua).

#### Disadvantages

These suggestions can only apply to future processes, as wider consultation on this Strategy is out of scope for this Version. Further consultation on implementation of the Strategy will be undertaken through other Council plans and processes such as the LTP, RLTP and community development planning.

#### Financial implications

The suggestions will require additional resourcing, but this cannot be quantified at this stage.

#### Other considerations

NPS-UD/FDS timeframes and need to progress adoption of the Strategy limit the scope for further engagement on the Strategy and FDS. Under the current Communications and Engagement Plan, SG partners have lead engagement with their own communities, that they know and understand using existing processes. Smartgrowth has focussed on specific stakeholder engagement. This has possibly created a perception that SG has undertaken little of no engagement with the wider community, as partner engagement on SG has not been transparently reported. Many of the issues raised can be need to be considered in the context of an updated Communications and Engagement Plan that will take the SG programme through implementation of the Strategy and lead up to a review in 2027.

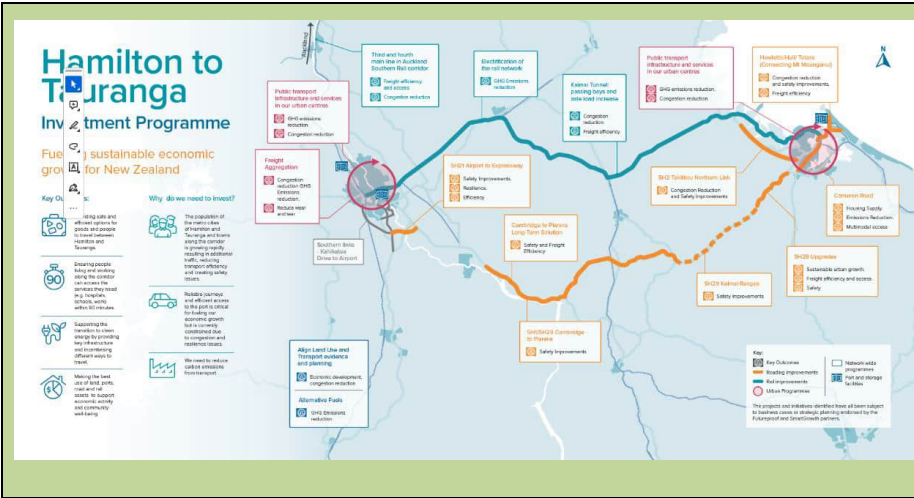
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Sensitivity: General

There are many opportunities to enhance communications and engagement, but always mindful of the need to coordinate this with the work of partners.	
<b>Issue 8: SmartGrowth Partnership</b> Submissions seek reestablishment of the SmartGrowth Forums, in particular the Strategic Partners Forum and that representatives from the Social and Environment Sector and KiwiRail are included on the SmartGrowth Governance Group (SLG) Bell Road Limited Partnership submit that the Development Sector Group be formally included in the SmartGrowth structure, with representation on the SmartGrowth Leadership Group, as it is for Tangata Whenua and Infrastructure Partners.	
<b>Option 8A:</b> That the matters raised in relation to membership of the SmartGrowth Leadership Group and re-establishment of the SmartGrowth Forums are referred to SLG for its consideration alongside the development of a Communications and Engagement Plan that will take the SG programme through implementation of the Strategy and lead up to a review in 2027. (Recommended)	
<b>Advantages</b> <ul style="list-style-type: none"> <li>Increased assurance and transparency to key sectors that their voices are valued and being taken into account in decision making.</li> </ul>	<b>Disadvantages</b> <ul style="list-style-type: none"> <li>Increased cost and complexity of partnership.</li> </ul>
<b>Financial implications</b> Not known, but the additional costs will arise from expanded formal engagement and governance.	
<b>Other considerations</b> Reestablishment of the Partner Forums indicates a wider concern over consultation and engagement as discussed in issue 7 above. Matters relating to representation on the Governance Group can be considered for recommendation to the SLG/Partner Councils. Engagement and membership of the SLG is a matter for Governance to decide. This should be considered alongside the development of a Communications and Engagement Plan that will take the SG programme through implementation of the Strategy and lead up to a review in 2027.	
<b>Issue 9: Hamilton to Tauranga Corridor</b> A submission by SmartGrowth seeks inclusion of the Hamilton to Tauranga Investment Programme in the Strategy.	
<b>Option 9A: Hamilton to Tauranga Corridor</b> Include the Hamilton to Tauranga Investment Programme in the SmartGrowth Strategy. <i>"Hamilton to Tauranga Corridor</i> <i>The Waikato and Bay of Plenty regions has a joined-up approach to the Hamilton to Tauranga Corridor given the significance of this connection. There are shared objectives and priorities, and a joint investment programme has been prepared (see Figure below).</i> <i>The joint investment programme objective is to fuel sustainable economic growth for New Zealand by highlighting the national importance of this strategic corridor which connects export industries through the Ports of Tauranga and Auckland and inland ports".</i>	

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<b>Advantages</b> <ul style="list-style-type: none"><li>• The joint investment programme objective is to fuel sustainable economic growth for New Zealand by highlighting the national importance of this strategic corridor which connects export industries through the Ports of Tauranga and Auckland and inland ports.</li><li>• The joint investment programme aggregates and makes transparent the investment decisions that have already been made by central and local government within the corridor in road rail and port infrastructure.</li></ul>	<b>Disadvantages</b> <ul style="list-style-type: none"><li>• </li></ul>	
<b>Financial implications</b>		
Nil		
<b>Other considerations</b>		
The recently notified FutureProof FDS includes the same provisions, as agreed between SmartGrowth and FutureProof. The joint investment programme is consistent with provisions in the RLTP.		

Sensitivity: General

Recommended Decisions
<p><b>Issue 1:</b> Oppose elements of the Strategy and propose to rationalise the SG, TSP and UFTI documents, revisit the growth scenario, work more closely with the development sector.</p> <p><b>Option 1A:</b> Note the submissions and make no changes. Note that the growth scenario evidence base has undergone significant expert analysis and will be revisited in the next iteration of the Strategy in a few years' time. The Strategy incorporates the UFTI connected centres programme and key elements of the TSP programme. SmartGrowth advisors regularly report to the Development Sector Group which is considered to be a key SmartGrowth stakeholder.</p>
<p><b>Issue 2:</b> Changes to Vision to reflect contemporary perspectives.</p> <p><b>Option 2A:</b> That the vision for the strategy is retained as per the version released for consultation</p>
<p><b>Issue 3:</b> Incorporating the values expressed by tangata whenua on pg 61 of the Strategy into the Vision</p> <p><b>Option 3B:</b> Do not incorporate the tangata whenua values into the Strategy Vision and note that these values are already incorporated into the Strategy on page 61.</p>
<p><b>Issue 4:</b> Proposed changes to challenges and opportunities</p> <p><b>Option 4A:</b> Change the Strategy Challenges, Opportunities and Objectives to reflect the following.</p> <p><i>Add "high level of active awareness there is of the natural environmental from most of our citizens" to opportunities on page 40.</i></p> <p><i>Add a statement on equitable outcomes to the social objectives on page 17.</i></p> <p><i>Add "high level of active awareness there is of the natural environmental from most of our citizens" to opportunities on page 40.</i></p> <p><i>Add a statement on equitable outcomes to the social objectives on page 17.</i></p>
<p><b>Issue 5:</b> Changes to Transformational Shifts:</p> <p><b>Option 5B:</b> Make no changes to the Transformational Shifts (Recommended)</p>
<p><b>Issue 6:</b> Implementation and Funding and Financing Plan – Specific Actions to be Included.</p> <p><b>Option 6A:</b> That the requested actions be noted and referred to the Implementation and Funding Plan process for consideration</p>
<p><b>Issue 7:</b> Consultation and Engagement</p> <p><b>Option 7A:</b> Note the submissions on the Strategy consultation and engagement process and consider these suggestions for future SmartGrowth consultation processes through an action in the Implementation and Funding Plan to prepare an updated Communications and Engagement Plan that will take the SG programme through implementation of the Strategy and lead up to a review in 2027.</p>
<p><b>Issue 8:</b> SmartGrowth Partnership</p> <p><b>Option 8A:</b> That the matters raised in relation to membership of the SmartGrowth Leadership Group and re-establishment of the SmartGrowth Forums are considered out of scope for deliberations on the SmartGrowth Strategy and be referred to SLG for its consideration.</p>

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**Issue 9: Hamilton to Tauranga Corridor**  
**Option 9A: Include the Hamilton to Tauranga Investment Programme in the SmartGrowth Strategy.**

### Decision

*Issue 1: Oppose elements of the Strategy and propose to rationalise the SG, TSP and UFTI documents, revisit the growth scenario, work more closely with the development sector.*

*Option 1A: Note the submissions and make no changes. Note that the growth scenario evidence base has undergone significant expert analysis and will be revisited in the next iteration of the Strategy in a few years' time. The Strategy incorporates the UFTI connected centres programme and key elements of the TSP programme. SmartGrowth advisors regularly report to the Development Sector Group which is s considered to be a key SmartGrowth stakeholder.*

### Reason

*The Strategy has incorporated the key elements of UFTI and TSP. The growth scenarios are evidence-based using most recent demographic and economic analysis and an updated HBA. It is not clear on what basis that this would provide any clearer evidence base.*

### Decision

*Issue 2: Changes to Vision to reflect contemporary perspectives.*

*Option 2A: That the vision for the strategy is retained as per the version released for consultation.*

### Reason

The current vision of "A great place to live learn work and play" captures the multi-faceted nature of the Strategy. It reflects the shift away from a singular focus on land for housing which characterised urban growth planning prior to SmartGrowth.

Read as a whole, the Strategy includes consideration of contemporary perspectives referred to in the submission.

The need for an updated vision could be reconsidered at the next review of the Strategy (2027).

### Decision

*Issue 3: Incorporating the values expressed by tangata whenua on pg 61 of the Strategy into the Vision*

*Option 3B: Do not incorporate the tangata whenua values into the Strategy Vision and note that these values are already incorporated into the Strategy on page 61.*

### Reason

These values are already incorporated into the Strategy on page 61. Read as a whole, the Strategy includes consideration of these values.

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Sensitivity: General

The need for an updated vision could be reconsidered at the next review of the Strategy (2027).
<b>Decision</b>
<p><i>Issue 4: Proposed changes to challenges and opportunities</i></p> <p><i>Option 4A: Change the Strategy Challenges, Opportunities and Objectives to reflect the following.</i></p> <p><i>Add “high level of active awareness there is of the natural environmental from most of our citizens” to opportunities on page 40.</i></p> <p><i>Add a statement on equitable outcomes to the social objectives on page 17.</i></p> <p><i>Add “high level of active awareness there is of the natural environmental from most of our citizens” to opportunities on page 40.</i></p> <p><i>Add a statement on equitable outcomes to the social objectives on page 17.</i></p>
<b>Reason</b>
<p>Recognises the community’s active participation in the environment.</p> <p>Places emphasis outcomes consistent with the Strategy’s Vision.</p> <p>Population change and impact of growth (including maps) are already covered in detail on pages 33–37 and is the overarching challenge and the basis for a Strategy that deals with planning for growth. Challenge 6 already covers deteriorating state of the environment and loss of biodiversity.</p>
<b>Decision</b>
<p><i>Issue 5: Changes to Transformational Shifts:</i></p> <p><i>Option 5B: Make no changes to the Transformational Shifts</i></p>
<b>Reason</b>
<p>The existing transformational shifts identify critical areas of intervention that are not “business as usual” components and reflect the areas that require particular attention to bring about change.</p> <p>A greater number of transformational shifts would detract from the focus and increase complexity, with limited benefit.</p> <p>The need for an updated Transformational Shifts could be reconsidered at the next review of the Strategy (2027) considering whether the areas of focus for transformation have become “business as usual” and to address any new and emerging critical issues.</p>
<b>Decision</b>
<p><i>Issue 6: Implementation and Funding and Financing Plan – Specific Actions to be Included.</i></p> <p><i>Option 6A: That the requested actions be noted and referred to the Implementation and Funding Plan process for consideration</i></p>
<b>Reason</b>

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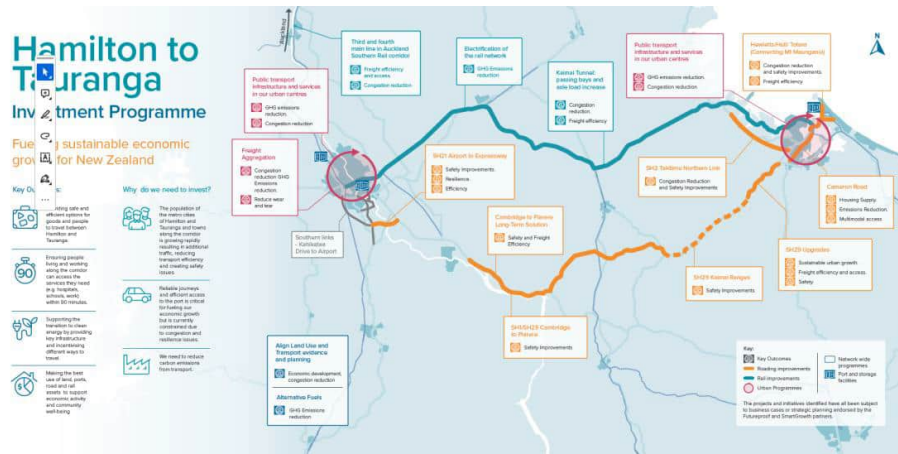
Sensitivity: General

<p>The submission points are implementation issues that do not need to be included in the Strategy.</p> <p>Consideration in the formulation of the Implementation and Funding Plan will ensure that these suggestions are not “lost”</p>
<b>Decision</b>
<p><i>Issue 7: Consultation and Engagement</i></p> <p><i>Option 7A: Note the submissions on the Strategy consultation and engagement process and consider these suggestions for future SmartGrowth consultation processes through an action in the Implementation and Funding Plan to prepare an updated Communications and Engagement Plan that will take the SG programme through implementation of the Strategy and lead up to a review in 2027.</i></p>
<b>Reason</b>
<p>The Statutory requirements for the SCP have been met.</p> <p>Further consultation on implementation of aspects of the Strategy will be undertaken through Council plans such as the LTP, RLT and through targeted actions under the Implementation and Funding Plan</p> <p>Noting these suggestions acknowledges the need for enhanced community engagement in future SmartGrowth processes and directs further discussion on the points raised by submitters.</p> <p>Providing for more public consultation in future would enable the wider community to be more engaged in the process and provide for more targeted engagement (e.g youth, Tangata Whenua).</p>
<b>Decision</b>
<p><i>Issue 8: SmartGrowth Partnership</i></p> <p><i>Option 8A: The matters raised in relation to membership of the SmartGrowth Leadership Group and re-establishment of the SmartGrowth Forums are referred to SLG for its consideration alongside the development of a Communications and Engagement Plan that will take the SG programme through implementation of the Strategy and lead up to a review in 2027.</i></p>
<b>Reason</b>
<p><i>Increased assurance and transparency to key sectors that their voices are valued and being taken into account in decision making.</i></p>
<b>Decision</b>
<p><i>Issue 9: Hamilton to Tauranga Corridor</i></p> <p><i>Option 9A: Include the Hamilton to Tauranga Investment Programme in the SmartGrowth Strategy.</i></p> <p><i>Include the following in Part 1 Introduction and Context</i></p> <p><i>“Hamilton to Tauranga Corridor</i></p> <p><i>The Waikato and Bay of Plenty regions has a joined-up approach to the Hamilton to Tauranga Corridor given the significance of this connection.</i></p>

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*There are shared objectives and priorities, and a joint investment programme has been prepared (see Figure below). The joint investment programme objective is to fuel sustainable economic growth for New Zealand by highlighting the national importance of this strategic corridor which connects export industries through the Ports of Tauranga and Auckland and inland ports”.*



## Reason

*The joint investment programme objective is to fuel sustainable economic growth for New Zealand by highlighting the national importance of this strategic corridor which connects export industries through the Ports of Tauranga and Auckland and inland ports. The joint investment programme aggregates and makes transparent the investment decisions that have already been made by central and local government within the corridor in road rail and port infrastructure. The recently notified FutureProof FDS includes the same provisions, as agreed between SmartGrowth and FutureProof. The joint investment programme is consistent with provisions in the RLTP.*

**Date approved:**

**Approved by:**



## SmartGrowth Strategy 2023 - 2073

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## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Louis Ranjard

Submission ID: 1

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Te Taiao - Environment

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

There is a real concern about air quality in the area, as demonstrated by some recent studies. We're talking about human health. This should be a top priority for the development of the region. I only see limited mention of it in the strategy, promoting green areas and replanting will help but not only, we need imposing standards in the industry and limit the traffic in the area until air pollution returns to safe levels.

Anything else to add?

no



## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Stephanie Smith-Kerr

Submission ID: 2

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Urban Form and Centres

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Yes from what I've read. I think the urban centres will reduce traffic. As I know many cutting across town for activities. Having more local activities and centres will reduce the number.

Select which chapter you'd like to provide feedback on: Te Taiao - Environment

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

I think Tauranga can do a lot more for the environment all the new builds should have rain water reserve for gardens. There needs to be a bigger push for industrial environment protection all these houses being built and all the waste.

Select which chapter you'd like to provide feedback on: Future Development Strategy

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Green space is packing in some of these potential high urban areas. I don't think development should be considered until infrastructure is already in place.

Anything else to add?

No

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Nathan Wansbrough

Submission ID: 3

Request to speak: Yes I would like to speak to my feedback

Select which chapter you'd like to provide feedback on: Economic Wellbeing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Yes

Select which chapter you'd like to provide feedback on: Housing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Yes

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Yes

Anything else to add?

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Doug feisst

Submission ID: 4

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Future Development Strategy

Select which chapter you'd like to provide feedback on: Future Development Strategy

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

I cannot believe you paid someone to write 180 pages of dribble. No wonder the National party said that if they get into government there will be a slash and burn of consultants who dream up this crap. Would the average citizen read through all the 180 pages and think wow, the council is certainly heading in the right direction. Can someone please write down what the council aims to do in the next 12 months, the cost of whatever is going to be done and who is paying, no use saying it's in the 15 year plan cause you won't be around then.

Anything else to add?

Get some local business people on board to give council some direction. I thought one of the major concerns would be sorting out down town Tauranga., it's like a ghetto.

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Wayne Goodley

Submission ID: 5

Request to speak: Yes I would like to speak to my feedback

Select which chapter you'd like to provide feedback on: Economic Wellbeing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Growth is not in anyway a contributing factor in sustaining life style and most especially our natural environment. Our focus should be one of mindfulness of NOW. Our plan should be to address the issue of a small but beautiful region and city NOT GROWTH. If we cannot fix our today issues we most certainly will not solve them with growth and the predictable costs both economic, environmental AND life style.

Anything else to add?

Listen to our Tanga when ya.

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Linda

Submission ID: 6

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Future Development Strategy

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

NO

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

NO

Select which chapter you'd like to provide feedback on: Social Infrastructure and Wellbeing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

NO

Select which chapter you'd like to provide feedback on: Climate Resilience

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

NO

Select which chapter you'd like to provide feedback on: Economic Wellbeing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Select which chapter you'd like to provide feedback on: Three Waters and Other Infrastructure

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

NO

Anything else to add?

I don't think the Council is for the people it is supposed to be representing

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Angela

Submission ID: 7

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Climate Resilience

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Consider managed retreat for areas at risk of coastal inundation

Anything else to add?

Please consider the most vulnerable when finalising the plan - people living in poverty, with disabilities, who are disadvantaged. Ensure the mana whenua voice is central

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Andy Goodall

Submission ID: 8

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Rural

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

no

Select which chapter you'd like to provide feedback on: Future Development Strategy

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

no

Anything else to add?

By the current state of our roading and infrastructure this group has proven they are a waste of time and ratepayers money. Consider disbanding please. You state you didn't know about the population increases yet pushed (advertised) the subdivisions at the lakes, Omokoroa and Papamoa but nothing was done to improve the roading, if anything it has gone backwards. Remove all tolls on our roads and get fibre into more rural areas. Get proper intersections now at Omokoroa and Tauriko/Cambridge Rd. Remove Tolls. Get Tauranga back to democracy.



## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Eva Wolf

Submission ID: 9

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Climate Resilience

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

It gives me confidence that you're taking the right direction when I see that the Environmental objective is placed at the beginning of the four well-being objectives; growth always needs to be sustainable when it comes to the planet, we can't grow at the expense of our planet and therefore our future generations!

Anything else to add?

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Ruth Underwood

Submission ID: 10

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Housing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Yes. These things are very integrated - would like to see more new housing built to 'green' and 'accessibility' standards, which would help reduce power usage, maybe generate at least hot water heating if not electricity panels on the roof etc.

For denser 'brown fields' development, the challenge is not unduly infringing on existing neighbours so need attention to height, daylighting etc.

Select which chapter you'd like to provide feedback on: Rural

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Yes. Really important to retain suitable land for the key local industries. There is a narrow range of suitable sites for our key kiwifruit and avocado industries, in terms of elevation, soils, terrain etc. Once it was citrus, but that has a similar requirement to the current key crops. This land is relatively easy to develop into housing in terms of site factors, so needs 'planning' protection to support the economic basis for the region.

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Yes.

Need a lot to happen here to make it easier to use public transport. Short term all road projects need to include walking, cycling, bus-lane, 'park and

ride' features. There are good things happening, but it is a real catch-up. I'm keen on a 'buses on the train track' dual rail/wheels system like the repair trucks that drive on the railway now. That would work for transport from Te Puke and Omokoroa over the longer term. What about a (free?) 'park and ride' from Baywave to Tauranga - frequent buses using the 2 bus lanes already in place, security-focussed parking ... get Bayfair to sponsor it? Park and ride somewhere around Totara Street for the beach visits over January or for those driving into the area to accommodation with inadequate parking and clogging up the Mount beach front, Pilot Bay and on-street parking, with 15 minute drop-off zones for people to unpack ... Some of these things could be trialed quite simply.

Congestion charging is tricky - congestion is its' own 'punishment' - so does influence travel and transport already.

Anything else to add?

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Simeon Clarke

Submission ID: 11

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Anything else to add?

Too much emphasis on cycleways and not enough on expanding capacity for private vehicles (electric or not) which is what improves our quality of life.

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Haley

Submission ID: 12

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Focus more on infrastructure & roading solutions!

Select which chapter you'd like to provide feedback on: Three Waters and Other Infrastructure

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Do not agree AT ALL to this treasenous 3 waters idea!

Select which chapter you'd like to provide feedback on: Rural

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Dam well look after our farmers who produce our food! Stop taxing them into desolation & ruining them with rules & regulations!!!

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Make the hairini bridge link into the city 4 lanes because half of the bop uses that route- its a no brainer that should have been done years ago!!

Anything else to add?

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: M Kenyon-Slade

Submission ID: 15

Request to speak: Yes I would like to speak to my feedback

Select which chapter you'd like to provide feedback on: Urban Form and Centres

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Yes, good for 70% of the Future development proposal, however the Tuaranga Council has been repeatedly warned that building expensive Council offices, Library, Museums, esplanade onto the sea ; can not, and will not be successful until such time that a large number of "new" multistory carparks have been built. We suggest 3 to 4 multi story carparks with capacity of 500 to 1000 cars spaced around downtown CBD. Please be warned until the carparks have been built It is a fools errand to think the public will cycle and take a bus from all around the city to visit and enjoy to all these new facilities. Our population is simply far too small and spread out by waterways for public bus and transportation to be used to any great deal. A million population number is a minimum threshold worldwide. It is for Priority One to convey and reinforce this simple message to these airy fairy Labour led Government planners. In my and many business people and logical thinking publics opinion.

Anything else to add?

The whole development proposal seems a commendable undertaking however it is clear world wide in countless examples that the acronym "No parking, No Customers, No Business! Is very apt.

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Heather Firth

Submission ID: 16

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Housing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Select which chapter you'd like to provide feedback on: Urban Form and Centres

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Select which chapter you'd like to provide feedback on: Climate Resilience

Anything else to add?

Instead of parking and public transport problems at the Mount, we could have electric tuktuks on a circuit, so that people could park far away and easily ride to the shops and amenities

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Tania Pirere

Submission ID: 17

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Economic Wellbeing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Just leave our area alone maketu has its own natural qualities, we don't big flash houses or over pollution only tanga whenua have the right to their takiwa. That's Te Awara for yeah  
ah trying to turn our beautiful maketu in a minute rotorua save it

Select which chapter you'd like to provide feedback on: Te Taiao - Environment

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

It's amazing how our local doc have been out there looking after our tupuna and making sure that our whenua and Moana are protected by our local wildlife caress

Select which chapter you'd like to provide feedback on: Housing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Due to the way maketu is situated I think it would be safe to add more houses especially along and up town point up by aware st that would be safer I suppose and only tangata whenua should be able to build there. Not people from other countries, sorry about

Select which chapter you'd like to provide feedback on: Social Infrastructure and Wellbeing



We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Very whanau oriented maketu is that's what I love about this community both local Pakeha and maori whanau awesome

Select which chapter you'd like to provide feedback on: Areas to be Protected and Developed Carefully

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

The whole takiwha of maketu. Maketu is the one of the very few little towns when you drive there especially for the time is like back in the 70s and 80s the whole ahautangata being back of the days of our nannys and koros

Select which chapter you'd like to provide feedback on: Urban Form and Centres

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Centers are good if you have heaps activities and his going on but maketu do not need those, they already have community Center and Houora that use Tobe used but not do much anymore, that te aware put there greedy hand in the pot

Anything else to add?

DON'T LET FORGERIES AND TE AWARA TAKE OVER MAKETU

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: chris Ingram

Submission ID: 18

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Here's an extra concept to manage Mount parking problems, traffic, free up Mount business district

Anything else to add?

Re Park and Ride concept.

a) free /low cost parking adjacent BayPark/Mercury stadium.location

b) e Buses circling Baypark - Mount Downtown - Baypark every 20 minutes at low/no cost

More frequently or limited only to summer time... and weekends.

Or parking building for 300 cars built as commercial undertaking on Council land .

## SmartGrowth Strategy 2023-2073 Online Submission

Name: Jared Lee  
Submission ID: 19

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Housing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Select which chapter you'd like to provide feedback on: Three Waters and Other Infrastructure

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Anything else to add?

Housing - stop going out and start going up.

Transport - if you stop going out and start going up you will lower your carbon footprint and reduce day to day CO2 output

Three Waters etc - Waste of money and time and undemocratic

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Nick Chalmers

Submission ID: 20

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Te Taiao - Environment

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

How will growth in our area effect resources particularly kaimoana. How will environmental impact of this growth be negated?

Select which chapter you'd like to provide feedback on: Te Taiao - Environment

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

How will you negate inevitable pollution caused by growth? What effects do you foresee this growth having on natural resources, in particular kaimoana?

Anything else to add?

Nope

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Wendy Wilson-Jenks

Submission ID: 21

Request to speak: Yes I would like to speak to my feedback

Select which chapter you'd like to provide feedback on: Housing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

I don't feel confident at all in your plan, unsmart growth!! Living in Omokoroa it is painfully obvious that the infrastructure is unable to cope with the housing that is already under construction that you have given i.e. roading and other facilities. Why don't you concentrate on your core council duties such as roading and infrastructure - since when did it become your core business to build housing for people who have not provided for their own future??

Anything else to add?

Please concentrate on council core priorities and leave housing issues to central government!!

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Callum Van de Weyer

Submission ID: 22

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Housing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Yes

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Yes

Select which chapter you'd like to provide feedback on: Climate Resilience

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Yes

Anything else to add?

Very nice plan.

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Bill Basher

Submission ID: 23

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Future  
Development Strategy

We want you to feel confident that we have a plan in place to manage  
growth. Do you think we're focusing on the right things?

Could be done quicker and better, not so sure about priority on down town

Anything else to add?

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: graham cooney

Submission ID: 24

Request to speak: Yes I would like to speak to my feedback

Select which chapter you'd like to provide feedback on: Urban Form and Centres

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

I have only read the executive summary. I do not see a description of what you want the Tauranga CBD to be. Presently many decisions are being made, implemented and financed without any comprehensive debate about "what is the vision for the CBD". Is it retail, entertainment, hospitality, business, accommodation - some of these or all of these? The present restructure of Cameron Road and proposed parking changes in the CBD to 11th Avenue area suggest that business and retail (definitely) and hospitality and entertainment (maybe) are not part of the plan. To an outsider looking on at the moment, present implementation suggests that TCC want to close down the CBD but there is a proposal to build a new city centre. It is very confusing and needs a well planned and informed debate before it is too late to change direction.

Anything else to add?

no



## SmartGrowth Strategy 2023-2073

### Online Submission

Name: Judy armstrong

Submission ID: 25

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Urban Form and Centres

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Yes

Anything else to add?

Do not spread out, go up with buildings. We want green land and be able to grow crops

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Scott Nicholson

Submission ID: 26

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Housing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

There needs to be a greater emphasis on the role of councils in addressing housing stress and the needs across the region. Councils stand at the forefront of housing transformation. By leading the creation and implementation of local housing strategies, as emphasized in the Government Policy Statement on Housing and Urban Development, they can effectively address community housing needs.

Here's what can be done:

Development of Evidence-based Housing Plans: Construct action plans grounded in solid data.

Leverage Resources for Optimal Housing Outcomes: Utilise available resources to bridge the housing gaps, particularly in areas like assisted rental, ownership, and community housing provision.

Collaboration to end homelessness with a housing first approach: The focus should be on championing the needs of those most susceptible to housing stress and homelessness in the region.

Mobilisation of Central Government Support: The central government plays a crucial role in addressing homelessness with their offerings like emergency housing, transitional arrangements, and social housing. Priority should be given to collaborating with local entities, including councils and iwi, and adopting a community-centric approach to significantly alleviate housing challenges. The Affordable Housing Fund and the Housing Infrastructure Fund exist to bolster affordable housing and facilitate infrastructure development.

Anything else to add?

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Richard

Submission ID: 27

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Climate Resilience

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No. Climate change needs to be at the centre of all thinking. Where we live and how we get around. Building roads will move congestion from one place to another. For every person that is able to catch a bus or use a bike, there is more room for those who can't and for delivery vehicles. Planning needs to include all modes of transport and park and ride. Park your bike and ride. All those things that stop people from using alternative transport need to be addressed. Move away from a car centric way of thinking. The electric car is not the answer, instead we need to get people out into their community sharing their commute and getting to know each other. What about passenger rail? Especially as an inter regional mode of transport. What is happening with the Tūmū regional park. An asset that families flock to in the weekends and all summer.

Intensification can look awful when done in existing neighbourhoods on small sections. New subdivisions should look at how good intensification can happen, with multi-storey buildings and green space. All communities should have access to green space and large trees. How can larger plots of land in old neighbourhoods be opened up to development. In many cities, slum neighbourhoods are bought cheaply and intensification happens. We are not going to get to that stage and need another way around this issue.

Select which chapter you'd like to provide feedback on: Areas to be Protected and Developed Carefully

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Room for wetlands and water. Auckland made all the mistakes we need to learn from. Make Tauranga a sponge city with room for rivers and wetlands

to take sediment. Houses should be built with a view to 100 years, not the next cyclone.

Corridors of vegetation linked together can provide a larger area for native animals.

Anything else to add?

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Andrew Thorpe

Submission ID: 28

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Economic Wellbeing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Not sure

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Select which chapter you'd like to provide feedback on: Climate Resilience

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Anything else to add?

Growth is synonymous with, at best, increased unsustainable demand on ecosystem services and at worst, environmental destruction. While except that at a local level, growth is inevitable in Tauranga, we must cease to portray growth as in any way positive. It is only a cost, both to the current population and to future generations.

SmartGrowth Strategy 2023-2073  
Online Submission

Name: Julie

Submission ID: 29

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Tāngata Whenua

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

You have no right to come into our country and tell us how to live. Best you back out and leave as quietly as you snuck in.

Anything else to add?

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Bruce Wallen

Submission ID: 30

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

The concept of all road transport going through a single area (or hub ) in the city centre then spoking back out to individual isolated centres is flawed as it will only take one road to be blocked or broken (as from earthquake, flood, or road accident ) and the network will be overloaded.

Suggest include,

1. second level radial routes (regional roads) linking the outlying centres so there is always an alternative access.
2. include commuter train network linking all centres as priority in all planning for transport, even to detriment of road width and capacity.
3. Preplan and invest in securing land for rail corridors and new roads now rather than wait until required, that will drive population spread and density as once corridors are defined on maps and plans people and business will look further ahead.

Select which chapter you'd like to provide feedback on: Climate Resilience

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Sea level rise with subsequent inundation of Papamoa and the Mount are likely in the future either from rising groundwater table levels or flooding by runoff to low lying areas, and possibly tsunamis. Make a clear stand NOW and state new building restrictions (setback) for coastal areas that restrict use of low lying or flat land. This will be unpopular but will direct development thinking, so rather a hard decision made now than wait and have to deal with issues such as buyouts of flooded houses, aka Auckland, Hawkes Bay.

Anything else to add?

Be bold in procuring sites for future infrastructure now and ignore the startup implications of cost and complaint. Learn from history.

Auckland wanted commuter trains in 1960 championed by Sir Dove Myer Robinson, but procrastination and prevarication means they still don't have an effective let alone efficient transport system.

And cars (and possibly petrol tax) prevail...



## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Whitiara Rangimarie McLeod

Submission ID: 32

Request to speak: Yes I would like to speak to my feedback

Select which chapter you'd like to provide feedback on: Te Taiao - Environment

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Yes, but with one glaring omission, data that will indicate whether Te taiao can accommodate the current municipal water take & future municipal take, Mairano.

Select which chapter you'd like to provide feedback on: Climate Resilience

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Yes, 70% out of 100q

Select which chapter you'd like to provide feedback on: Housing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Select which chapter you'd like to provide feedback on: Three Waters and Other Infrastructure

Anything else to add?

I am also attaching a presentation on water catchment management plan





# What is a “Drinking Water Supply Catchment”?



That area of land that:-

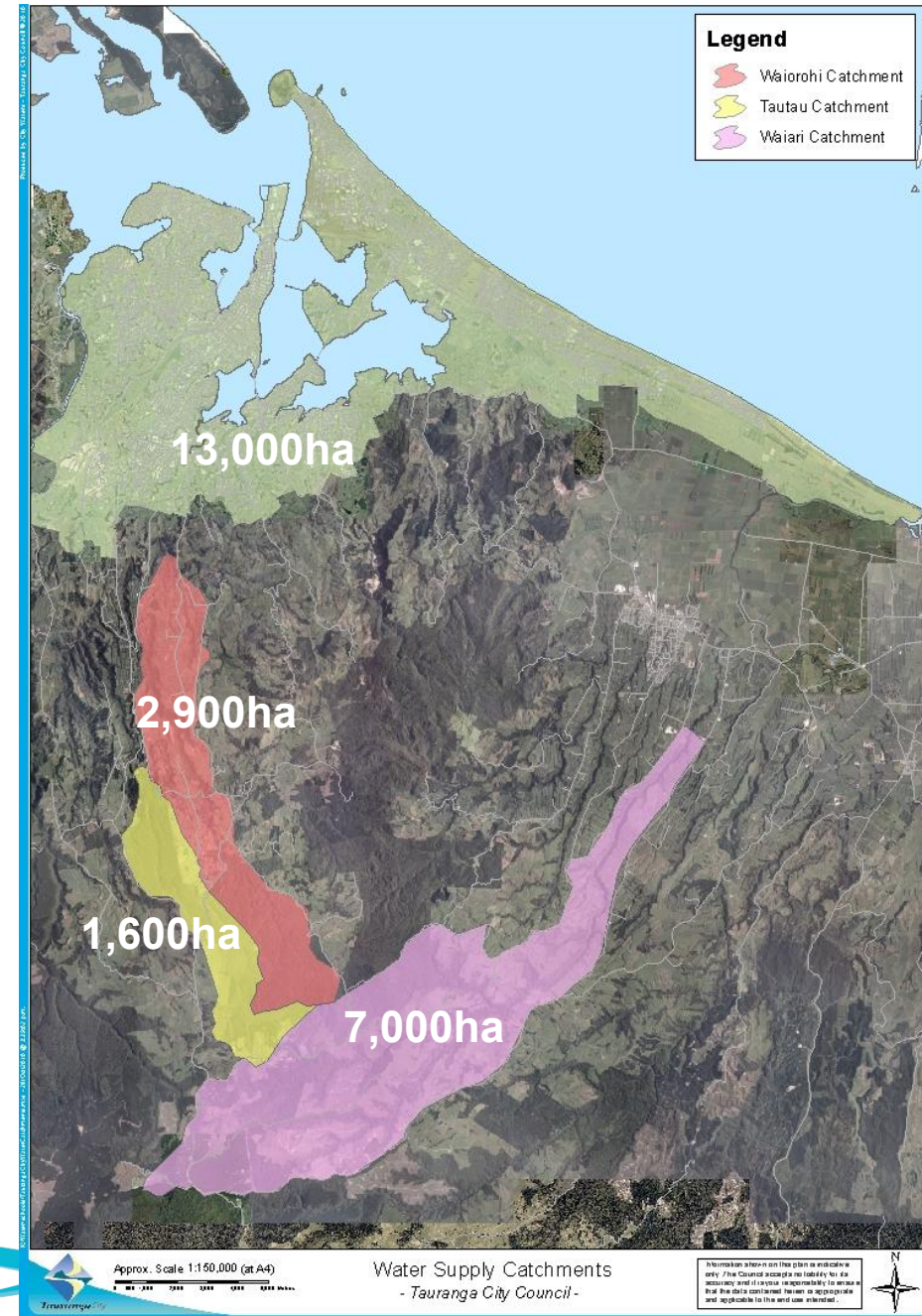
- drains into a drinking water supply stream
- percolates into an aquifer that supplies a:-
  - ❖ drinking water supply stream via a spring
  - ❖ drinking water supply borehole





# Where are the TCC Drinking Water Supply Catchments?

- ❑ **Waiorohi Catchment**  
feeds the Oropi plant
- ❑ **Tautau Catchment**  
feeds the Joyce Road plant
- ❑ **Waiāri Catchment**  
future water supply



# Composition of the TCC Drinking Water Supply Catchments



## Tautau

- 70% Native Forest
- 30% Mix of pasture, lifestyle blocks and some forestry



## Waiorohi

- 33% Native Forest
- 67% Mix of pasture, horticulture, lifestyle blocks and some forestry



## Waiāri

- 27% Native Forest
- 54% Mix of pasture, horticulture and lifestyle blocks
- 19% Exotic Forest





# Why do we Manage the Drinking Water Supply Catchments?



# Land Use/Source of Contamination

- ☐ **Agriculture** (Cultivation of soils, Growing of crops and the rearing of animals to provide food and other products)
- ☐ **Forestry** (Site preparation, planting, management & harvesting of trees)
- ☐ **Industry** (Economic activity concerned with the processing of raw materials and manufacture of goods in factories)  
Including product and cold storage, meat, milk and wood processing packhouses, laboratories and scrapyards)
- ☐ **Commerce** (The activity of buying and selling, especially on a large scale)
- ☐ **Residential** (Including lifestyle blocks)
- ☐ **Conservation** (Including native forests and reserves)
- ☐ **Recreation**
- ☐ **Institutes of Learning**
- ☐ **Roading**
- ☐ **Open Space** (Including vacant land)
- ☐ **Landfill** (Including clean fill)
- ☐ **Waterworks**
- ☐ **Sewage works** (Including liquid waste ponds & on-site systems)
- ☐ **Mining and Quarrying**
- ☐ **Ecological/Geological/Geothermal** (Flood, drought, slips, volcano, earthquake, saltwater intrusion)
- ☐ **Malicious Intent**



# Causes of Contamination from Land Use/Source

- ❑ Fire (Including consequence of fire & use of retardants)
- ❑ Animal & Human Wastes (Sewage, excrement and dead animals)
- ❑ Solid & Liquid Wastes
- ❑ Chemicals (Agri/forestry chemicals, pest plant & pest animal toxins)
- ❑ Roadworks & Maintenance
- ❑ Incidents and Accidents
- ❑ Stormwater & Other Discharges
- ❑ Farm drains
- ❑ Abstraction, Irrigation, Backflow and Unsecure Bore Heads
- ❑ Algal Bloom
- ❑ Natural Occurrence





# Sooo how do we Manage the Drinking Water Supply Catchments?

The  
integrated  
approach



The  
multibarrier  
approach









# 1 - Political Environment

Yes dry as a bone!

But a VERY powerful tool and of significant value as it provides the governance, direction, protocol and authority to manage the other four environments as well as the natural resource itself.

There are 2 levels but 3 forms of governance:-

- National
- Local
  - ❖ Regional (Region)
  - ❖ Territorial (City or District)



# National Authority

Catchment Management involves utilizing more than 20 pieces of legislation being administered by over 10 government departments.

Arguably there the 3 most important would be:-

- The Water Services Act
- Resource Management Act
- The Local Government Act



see <http://www.legislation.govt.nz/default.aspx>

# The Water Services Act

To ensure that drinking water suppliers provide safe drinking water to consumers

## Amongst other imposes:-

- Duties onto water suppliers including having to:-
  - ❖ Supply safe drinking water.
  - ❖ Comply with drinking water standards.
  - ❖ Register the supply with Taumata Arowai.
  - ❖ Provide sufficient quantity of drinking water.
  - ❖ Perform duties where sufficient quantity of drinking water is at imminent risk.
- More than 20 offences including that it is an offence for any person who does any act likely to contaminate any raw water or drinking water, knowing that the act is likely to contaminate that water, or being reckless as to the consequences of that act. The person being liable on conviction to imprisonment for a term not exceeding 5 years, or to a fine not exceeding \$600,000, or both.



# Resource Management Act

To promote sustainable management of natural and physical resources

Dictates that Local Government will, amongst other, develop and Maintain:-

## □ Regional Policy Statements

- ❖ The Regional Policy Statement provides a framework for sustainably managing the region's natural and physical resources. It highlights regionally significant issues with our land, air, fresh and coastal water, infrastructure and biodiversity, including issues of significance to iwi.

## □ Regional Plans

- ❖ Regional plans manage the natural and physical resources of a region. The purpose of a regional plan is to set out how resources should be managed, including rules and regulations for their use. Includes the methods and processes that will be used to identify and address resource management issues that cross the boundaries between districts, and between regional councils.

## □ District Plans

- ❖ The purpose of district plans is to assist territorial authorities in carrying out their functions in order to achieve the sustainable management purpose of the Resource Management Act.



# Local Government Act

Provides for democratic and effective local government

Dictates that Local Government will, amongst other, develop and Maintain

## □ Triennial Agreements

- ❖ The agreement represents the shared desire of local government in the Bay of Plenty to work collaboratively to maximise effectiveness and efficiency.
- ❖ Protocols for communication and coordination across borders of local authorities.

## □ Ten-year plans

- ❖ Describes the activities and community outcomes of a district/region.
- ❖ Provides for accountability, integrated decision making.

## □ Annual Plans

- ❖ Council budget.
- ❖ Supports ten-year plan.





## 2 - Economic Environment





## 3 - Social Environment

Activities will take place in open spaces and on private land.

Open, honest and timeous response and/or collaboration.



## 4. Cultural Environment

The whole of the Bay of Plenty is an area of cultural significance.

Open, honest and timeous response and/or collaboration.

Consider both:-

- Archaeological obligations (Objective evidence)
- Cultural obligations (Objective, generational, spiritual evidence)



# 5 Ecological Environment

**Potential definition:** All living things within a place, including such place and their interaction with each other and that place.

Manage, maintain, protect  
the ecological environments within the  
catchments by:-

- Enhancing the, carrying capacity of the catchments supporting, native biodiversity and associated ecosystems.
- “Stabilizing the currently disruptive relationship between earth's two most complex systems: human culture and the living world.”
- Guarding natural resources associated to the catchments.



# The Multi Barrier Approach

- The Basis of the Water Safety Plan.
- Does not replace but compliments existing conventional Drinking Water Quality Control systems.
- Proactive and prevents contamination as apposed to conventional quality control which may only identify contamination once the product has already been consumed
- Implement “barriers” to contamination.
- Ensure the “strength/integrity” of the barriers are maintained.



# Six Barriers to Contamination

- The Catchment Native Forests
- Dedicated FTE + budget
- Mapping system
- Shutdown abstraction
- Demand management
- Emergency response planning



# Barrier 1

## The Catchment Native Forests

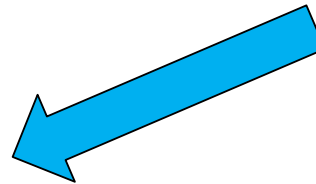


- ☐ Provides a physical barrier to inappropriate land use/access
- ☐ Minimises flash flooding and contributes to sustainability of flow.
- ☐ Reduces sediment and nutrient loads from entering the stream.
- ☐ Enhances stream water quality and natural purification of streams.





# Native Forests vs Altered Land Use



# Barrier 2

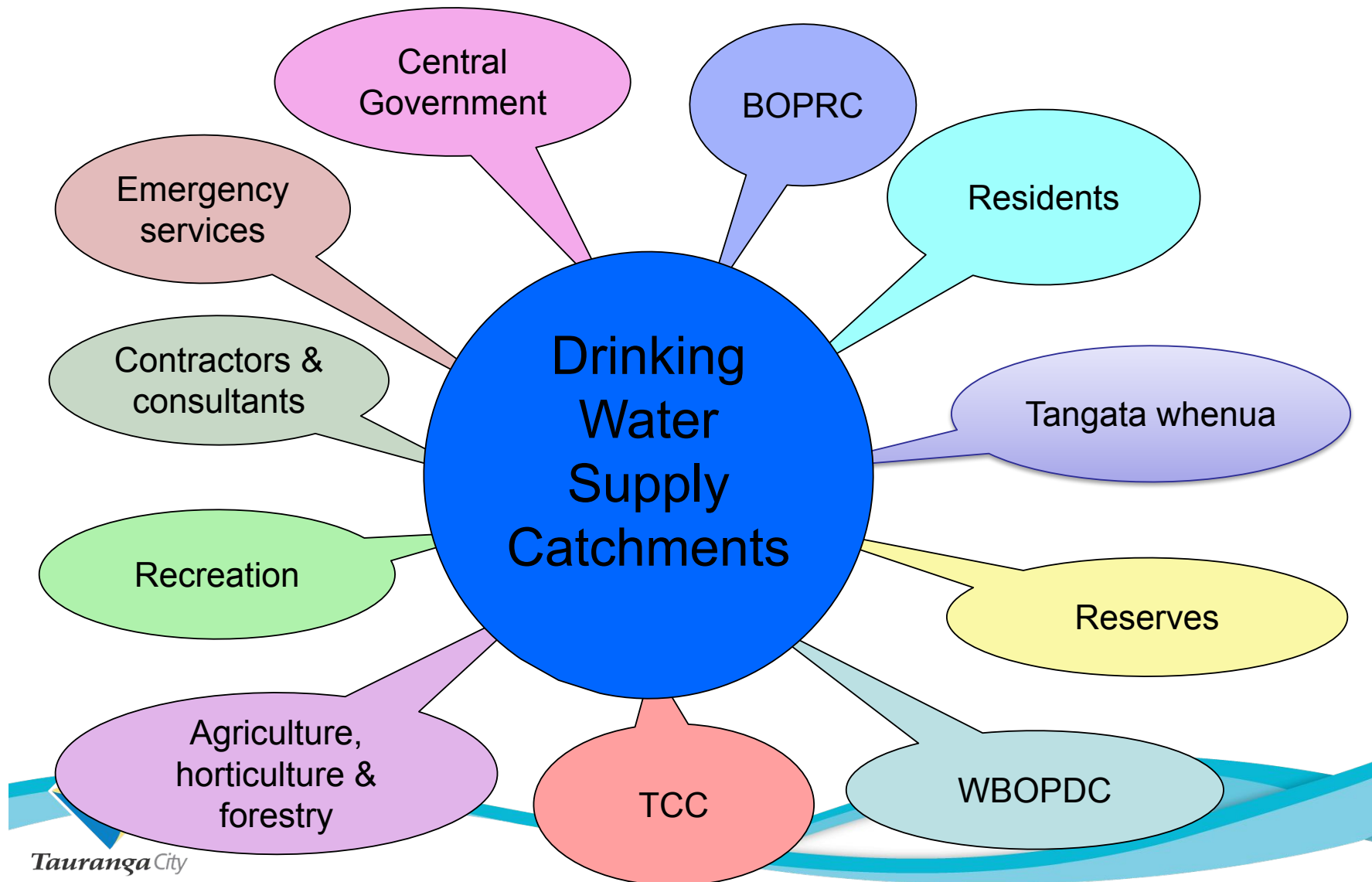
## Dedicated FTE + budget

- Raises awareness of the significance of the drinking water supply catchments and streams to alter behaviour and activities accordingly.
- Responds to anomalies, incidents, events, queries and complaints that pose a threat to the water supply.
- Develops and maintains the ICMP which is not only a reference document but includes contingency plans to deal with and minimise effects of an incident.
- Manages activities on TCC owned land includes native & exotic forests.
- Administrators and records all the above which allows for catchment management continuity and objective evidence to minimise disruption and delays and provide a timely response to any threat to the raw water supply or associated matter of concern.





# FTE Raising awareness - Collaboration



# FTE Raising awareness - Collaboration



# FTE Raising awareness - Signage



Entrance to Catchments



At Stream Crossings



Around TCC Owned Forests

- Health and safety
- Public awareness
- Pollution Prevention
- Emergencies





# FTE Response - Discharges off unsealed roads





# FTE Response - Slips



Road works 7km upstream of Oropi intake



Stormwater discharge point 10km upstream of Oropi intake

# FTE Response- “Clean fill” dump sites





# FTE Response - Chemical usage/spillage

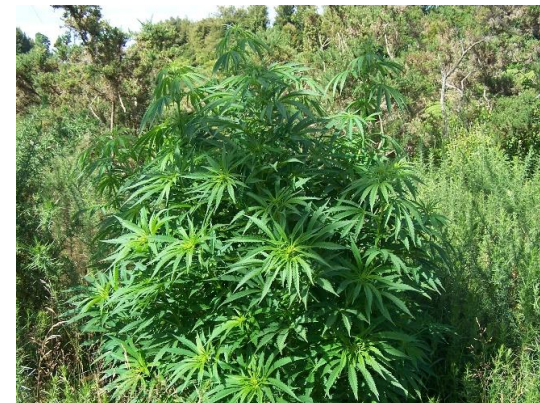


HSNO Warning  
May be harmful if  
inhaled swallowed  
or in contact with  
skin  
Harmful to aquatic  
life





# FTE Response - Recreation





# FTE Response - Animal and Human Wastes





# FTE Response - Agriculture/Horticulture

Irrigation



Riparian margins

Faecal matter



Herbicides  
Pesticides

Nutrients

Discharges



Dumps



Farming across ephemeral waterways



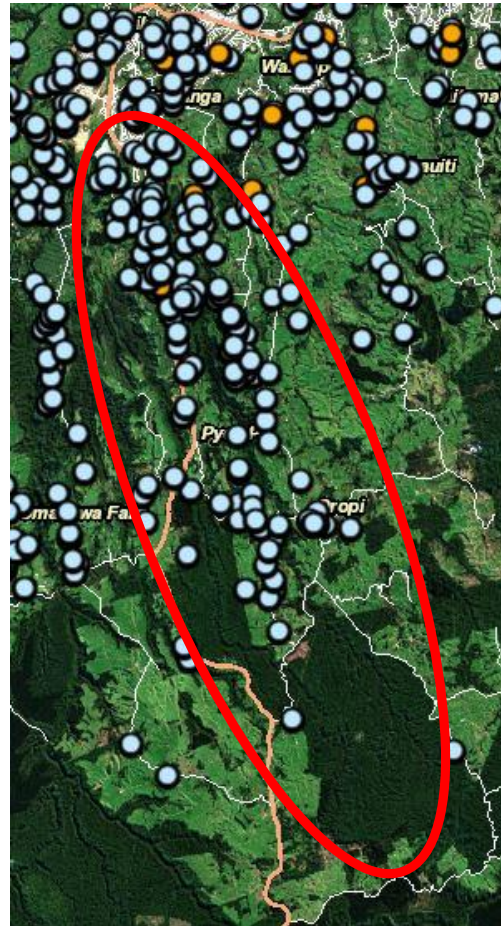
# FTE Response - 3rd Party abstraction/Back feed



Ram pump Waiorohi



Electric pump Tautau



Boreholes in the catchments



Waterwheel Waiorohi



# FTE Response - Aquifer management



Tautau flows 31 Jan 2020 - 2 pumps 403 l-s  
- scour closed



Tautau flows 17 Sep 2020 - 2 pumps - 416 l-s  
- Scour closed



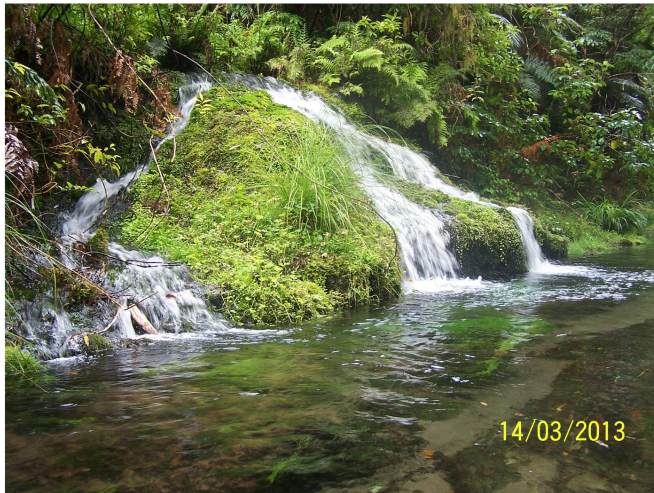
Tautau flows 24 Nov 2020 - 2 pumps - 417 l-s  
- Scour closed



Tautau flows 18 March 2021 - 2 pumps - 416  
l-s - Scour closed



# FTE Response - Aquifer management contd.





# FTE - Manage TCC Assets - General





# FTE - Manage TCC Assets - Fencing and access



Fencing to prevent stock accessing forests and waterways



Bar gates to prevent:-

- Illegal dumping
- Unauthorised vehicular access



# FTE - Manage TCC Assets — Native forests



\$2500



\$4500



2008 □ 2023 there were 204 occurrences costing \$32,000

- Unsightly
- Health Hazard
- Fire Hazard
- Encourages vermin and pest animals
- Pollutes waterways



# FTE - Manage TCC Assets — Pine forests



Maintenance



Harvest





# FTE - Manage TCC Assets — Pine forests



Harvest



Post Harvest



# FTE Develop and Maintain The Integrated Catchment Management Plan

An all-inclusive reference and operational document of TCC  
Drinking Water Supply Catchment Management

- Identifies, highlights and lists areas of concern including improvements and work required.
- Includes response/contingency plans to deal with and minimize effects of a variety of potential incidents that could have an adverse effect on the Stream Water quality and/or quantity.
- Details the Tauranga City Council owned catchment assets.
- Identifies relationships and links to relevant documents of authority and direction.
- Documents, across several chapters, what we are doing, how we are doing it and the history of this catchment management and operation.



# FTE Administration and record keeping

- A readily available record of all the above cannot be overstated.
- Allows for catchment management continuity and objective evidence to minimise disruption and delays and provide a timely response to any threat to the raw water supply or associated matter of concern.
- Noting that catchment management is vast, diverse and of infinite time and what is said or done today needs to be captured in a medium other than the human brain, as it will be challenged, scrutinised and utilised in the future.



# Barrier 3

## Mapping System

- Allows for the study and identification of: -
  - ❖ The most vulnerable areas of the catchments to be able to mitigate associated risks accordingly.
  - ❖ Land use and facilities taking place and take appropriate steps to mitigate any possible contamination to the raw water supply arising from an activity.
  - ❖ Incidents and events so as appropriate measures can be put in place to prevent reoccurrence and/or any other mitigation of risk or follow up inspections required.
  - ❖ An area prior to accessing that point of interest for physical inspection. This not only to timeously mitigate a particular risk to the water supply but also from a planning as well as health and safety perspective.





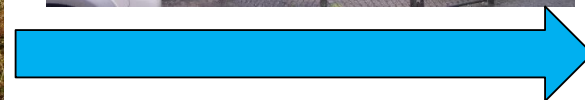
# Mapping System contd.

- As a landowner of over 2500ha in the drinking water supply catchments a sound understanding and record of land owned including assets, culturally sensitive sites, incidents, events and causes of such on this land is essential in being able to effectively monitor and manage this land.
- Provides a wholistic, universally accessible way to present the significance and sensitivities of the catchments and catchment management to interested and effected persons which reduces untoward activities taking place.



# Barrier 4

## Shut down Abstraction System



Allows “first flush” of contamination to bypass the treatment plant

# Barrier 5

## Demand Management

- ❑ Water watchers plan
- ❑ Management of supply vs demand and the development and use of the existing and future water sources ensuring timely contingency and sustainability of supply
- ❑ Better Understanding and Management of Source Water Reservoir





# Barrier 6

## Emergency Response Planning



Over and above the Integrated Catchment Management Plan and the Water Safety Plan which are used in the day to day management and operations in the catchments, two plans provide common direction and understanding in the event of an emergency and/or catastrophic event:-

City Waters Incident Response Plan for More Complex and Wide Ranging Events

Tauranga City Council Emergency Management Team and Plan for Catastrophic Events



# In Conclusion

- Drinking water supply catchments and waterways, by their very nature, are diverse, complex and dynamic systems.
- Catchments are increasingly at risk from the:-
  - ❖ Increased water demand.
  - ❖ Intensification of industrial, commercial, agricultural and private development.
  - ❖ Increased recreational demand.
  - ❖ Extreme climatic events.
- We have moral and legal duties and obligations to protect and enhance the catchments, to optimise stream water quality and quantity and to minimise disruption and contamination of supply, both now and into the future.
- And to put it bluntly – shut the water supply down, shut the Tauranga District down.





Thank you!



## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Nathan Sanderson

Submission ID: 33

Request to speak: Yes I would like to speak to my feedback

Select which chapter you'd like to provide feedback on: Future Development Strategy

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

I am Nathan Sanderson. I am 35. I have a wife and 3 young boys. I was born and grew up in Tauranga. I currently live in Te Puna, Tauranga. I love Tauranga.

Recently I completed Tamahere Country Club. I completed Plan Change 12 within Waipa District Council opening 20ha of developable land. I am now starting Matamata Country Club. Trend is Waikato where Councils want us to bring them proposals to help them.

Prole road, Omokoroa - only area in district currently developable. My sister and brother-in-law are currently working here.

Te Tumu, Papamoa – Understand Wetlands causing a major issue via NPS and Maori land title with proposed area blocking access.

Tauriko West – Wetlands scattered throughout causing major issues via NPS and steep country causing major Geotech issues.

Plummers Point / Te Puna / Belk road / Keenan road / Joyce road – Sewer connection very difficult. Stormwater could be an issue with NPS. Extensive Gold Kiwifruit throughout so land values will be higher than developers will pay.

House Prices are supply and demand. Low supply, steady demand = Increase House Prices. Queenstown average House price approximately \$1.7million, Auckland \$1.2million and Tauranga currently \$1.0million. Tauranga will be the next unaffordable Queenstown if we don't start asking Developers to help.

Ask us developers to help by bringing you proposals. Developers collate the parcels and solve the issues. Council must keep an open mind. Developers can create something special when we have flexibility.

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Review town centres:

Tauranga CBD, Mount Maunganui CBD, Bayfair, Papamoa, Te Puke, Otumoetai, Bethlehem and Omokoroa.

Potential bulk transport options:

Sea Ferry – unreliable with weather and tides

Buses – increase infrastructure to create fast bus links? Short term...

Train – All have current rail access. Will need to be upgraded to be dual lane as must be a fast service to encourage users. Developers bid for Train stations and can develop around them.... Long term...

Select and commit now, invest heavily to create the future we need.

Anything else to add?

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Andy Foster

Submission ID: 34

Request to speak: Yes I would like to speak to my feedback

Select which chapter you'd like to provide feedback on: Rural

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Unlocking more housing options for rural property's. ie 10m from boundaries on smaller blocks as the restrictions make it too hard. My neighbour has an illegally build shed so I can't build closer than 30m from the boundary on my small 1.3ha property. Even though both neighbours have built on the boundaries. Neighbours won't sign off a minor dwelling so unless i build in the middle of

My paddock there's no options

Anything else to add?

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Jason Low

Submission ID: 35

Request to speak: Yes I would like to speak to my feedback

Select which chapter you'd like to provide feedback on: Urban Form and Centres

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Air Polluters need to move out of the mount industrial zone, as the air quality is terrible for the mount Maunganui suburbs health!

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

A commuter train from the CBD to the mount to tepuke

Anything else to add?

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Monique Brown

Submission ID: 36

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Urban Form and Centres

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Yes, although we want to ensure we have more cycle ways, clean air pollution for our tamariki. Safe pedestrian crossings for railways near schools and wide footpaths. Absolutely love the new wide cycle and footpath along marine parade. Amazing

Anything else to add?

No



## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Lois

Submission ID: 37

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Climate Resilience

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No.

Select which chapter you'd like to provide feedback on:

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Select which chapter you'd like to provide feedback on: Three Waters and Other Infrastructure

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Anything else to add?

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Michael Smith

Submission ID: 38

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Yes very good overall. I am concerned no real planning on passenger rail as a solution to clean, efficient and viable transport in the region and outside the region Hamilton - Auckland. The rail network is already in place - we should be using it. I understand to fully upgrade to the required level for all North Island is around \$3b so BOP being the fastest growing region, etc. Passenger Rail should be high Priority One priority.

Anything else to add?

No thanks

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Pauline Bennett

Submission ID: 39

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Economic Wellbeing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Inclusionary zoning is a key part of the housing strategy.

Discretionary zoning so that Elders are acknowledged in Social Housing allocations. Currently elders can not get on the MSD social register.

Home ownership priority – Tauranga must aim for 80% home ownership.

Government rental properties must priorities rent to own. This provides security of tenure, health benefits and property care/maintenance

Until home ownership is 80%+, government housing must priorities sustainable provision of Elder housing. All other groups can come within rent to own policies

3 to 8 story single floor apartments priority – provide security of tenure even if privately owned, with priority for Elder Social Houses and rent to own for all other groups. Development within current urban areas.

3 – 8 story single floor apartments within the current urban area (19,000 TCC's RER) will address the current housing shortage without the need for debt inducing road infrastructure development at Tauriko.

Affordable homes – are homes that can be purchases by the medium income (\$32,000pa)

Select which chapter you'd like to provide feedback on: Housing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

3 to 8 story single floor apartments – because lifts are required therefore there is no discrimination against Elders and persons with disabilities. Development within the current Urban areas.

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Inclusionary zoning is a key part of the housing strategy.

Government must lead development with Smart Sustainable Plans not developers. Incentives can lead to development in the right way and the right place (within the current urban areas).

Stop boundary development, commit 15 – 20 minute communities, commit to public transport. Plan for Elders and Young Maori. Develop communities that are self sustaining.

Green spaces – set a space per household

Select which chapter you'd like to provide feedback on: Rural

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Housing:

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Green spaces – set a space per household

#### Transport:

Electric Commuter Trains/trams Government funded – for fast efficient inter community connections. Taking cars and buses off the roads

Government must lead development with Smart Sustainable Plans not developers. Incentives can lead to development in the right way and the right place (within the current urban areas).

Bus Hubs – Full service Bus Hubs at all major community connections

You can not propose intergenerational debt with an ageing population

#### Lifestyle:

Plans base on evidence and principles

A strategic platform for community outcomes by each council – Smart Sustainable Growth Forum (or re-establish SmartGrowth Forum.

#### Urban Development:

15 to 20 minute sustainable communities

#### Liveable communities

Class 1,2,3 LUC land – ban further use for housing development

Priority is intensification in existing urban areas

Select which chapter you'd like to provide feedback on: Urban Form and Centres

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Priority is intensification in existing urban areas

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Transport:

The highway as the rapid transport passage – because Tauranga is a port city therefore priority should be for Port transport. Government and Port funded not rate payer debt burden funded. Cameron road should not be the rapid transport passage. Stop Tauriko.

Tauriko development – will lead to intergenerational debt. Intergenerational debt can not be serviced by an ageing population

Consideration should be given to making Cameron Road and Frazer Street one way streets.

Electric Commuter Trains/trams Government funded – for fast efficient inter community connections. Taking cars and buses off the roads

Government must lead development with Smart Sustainable Plans not developers. Incentives can lead to development in the right way and the right place (within the current urban areas).

Bus Hubs – Full service Bus Hubs at all major community connections

You can not propose intergenerational debt with an ageing population

Select which chapter you'd like to provide feedback on: Social Infrastructure and Wellbeing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Homes:

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Bus Hubs – Full service Bus Hubs at all major community connections

You can not propose intergenerational debt with an ageing population

Life style:

Implement Live, Work, Play – through the use of local facilities e.g. schools, tertiary education facilities, churches, halls.

Liveability communities forum – to plan development

A strategic platform for community outcomes by each council – Smart Sustainable Growth Forum (or re-establish SmartGrowth Forum).

Plans based on evidence and principles

Urban Development:

15 to 20 minute sustainable communities

Liveable communities:

Class 1,2,3 LUC land – ban further use for housing development

Priority is intensification in existing urban areas

Select which chapter you'd like to provide feedback on: Future Development Strategy



We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

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Liveable communities

Class 1,2,3 LUC land – ban further use for housing development

Priority is intensification in existing urban areas

Anything else to add?

Tauranga 18 October 2023

Dear Madam/Sir

I have not read the whole Smart Growth Strategy document as I have not got the time to do so (180 pages!) and was not able to get a printed copy.

I have not seen any advertising about public/information meetings to explain the strategy. We are looking at planning for the next 50 years and I really think that ratepayers need to have a discussion about this other than making a submission.

I personally want to live in a "liveable" city where everything is close by, where I can bike safely, where I can take a form of door-to-door affordable public transport with no need for a car, where there are lots of trees and green spaces, where there is a community hub in the neighbourhood etc...

If the region wants to plan for more people, it needs a **PLAN**. At the moment development is **developer driven** and that has led to suburbs with no soul, no community facilities, no shops at walking/cycling distance, no employment close by, standard one storey 3-to-4-bedroom houses, no provision for walking/cycling paths between streets etc...

We have seen this happening in Rolleston where at some stage Selwyn District Council realised that the town centre had been 'forgotten'! No wonder if there is no plan before starting development. A town centre has now been created by taking part of the reserve. Houses that were no more than 10 years old and were built in a residential zone had to be demolished to make place for shops after the area had been rezoned commercial. What a waste of time/ resources and money!

Under Norman Kirk in the 1970s there was a plan for developing Rolleston but there was no plan when Rolleston's development took off in the 2000s. What a disaster. Is this the kind of development we are going to see in Tauranga?

NZ is still following the American model of single storey detached houses on a piece of land (postage stamp size these days as land has become so expensive) used since the 1950s-1960s. This assumed that petrol was cheap and that people could go anywhere in a car. The situation is vastly different in 2023 where everyone needs to reduce greenhouse emissions and adapt to climate change.

NZ and in particular WBOP could look at examples of successful overseas developments and adapt them to local conditions.

In the Netherlands 2 cities Lelystad (80.000 people) and Almere (now over 210.000 people) have been built from scratch where the sea used to be less than 100 years ago. For the development of Almere everything was planned on paper (including train stations, hospital, schools, city centre, opera house, cemetery, parks, waterways etc) and the necessary infrastructure (railway line, motorway etc) was put in before one house was built.

What NZ needs is to go back to a form of **town planning**. The councils need to draw the plans first and developers can build whatever is necessary, not the other way around. This would be a game changer.

I fully agree with intensification of Te Papa peninsula but again **it needs a plan** and is not up to individuals to subdivide their property and put a 3-storey building in front of their neighbours without any consultation. That will produce more houses but surely not a 'liveable' city where neighbours live in harmony.

The kind of development that Smart Growth Strategy is proposing **is money driven, not people driven**. That is what is wrong. I also can't believe that it talks about more roads for more cars. Even if people get more hybrid cars and EVs, if they still use their cars to move around, more roads and carparks will be needed as the population increases. More people need to live in the city centre. The main shopping streets like Devonport Rd and Grey St could be rebuilt with at least 3 storey buildings with 2 storey apartments on top of shops. That would make a vibrant and revitalised city centre and provide more houses.

**Transport:**

This goes together with housing. To reduce the number of cars on the road I don't think that a price tax will be the solution. It will again put an extra burden on already struggling families. Public transport needs to be put into place before starting intensifying areas and developing new ones.

What about encouraging people to carpool when they go to the same place/event at the same time? What about having a separate lane for cars that carry more than one person (T2 or T3 like in Auckland)? What about creating a network of connected cycle lanes physically separated from roads? What about a frequent and reliable bus system (like every 10 min) during rush hour? What about a minivan public transport door to door service outside rush hour - like they are trialling in Tawa and Timaru? What about free buses for school children going to school? What about express commuter buses? What about using the rail in suburbs where the train goes through (like Omokoroa to Te Puke for example). What about making use of ferries?

I thank you for reading my comments.

Regards  
Nicole Bührs

**Submission to the Smartgrowth Strategy for the Western BOP 2023**

This is a personal submission and reflects my concerns and ideas after discussion with others in the community. My understanding is this strategy is for the Western BOP subregion for the next 30 years.

We have lived in Tauranga for over 20 years, and in that time, it appears that development has been led by developers in an ad hoc fashion. Clearly, a greenfield growth model is the modus operandi, with little thought for sustainability, long term planning, integrated public transport and community wellbeing, but would seem to be the easiest route for maximum profits. For a sustainable future, for a functional and well-planned city that stops spreading onto arable land and meets the needs of its inhabitants over the next 30 years, this pattern needs to stop. The council needs to take the lead in all future development so developers are required to conform to established guidelines set down by the council in a consistent, integrated, and planned process. We need time to do this well and we need urban planning that is consistent with this vision. In other words, not the tail wagging the dog, but the other way around.

There is confusion around several documents outlining future plans for the region and the intensification that is intended eg Smartgrowth, UFTI, the Transport System Plan. It would be good to rationalise these documents into a united framework with consistent figures. This would be a good start for future planning.

We need robust integrated assessments with enough time for thorough public consultation, well informed urban planning, geotechnical analysis, a clear review of transportation options, with acknowledgment of Papatuanuku, using up to date best practice. A suggested framework for this is sustainability and a good quality of life for all.

Using this lens, the Crossing is a case in point. This is a large American style urban park which requires cars to drive between many shops with no place for community engagement. It is an outdated concept in this time of climate emergency with ever reducing land availability, and sadly is a lost opportunity for Tauranga. Imagine a multi-storey commercial centre with a small footprint, a central community hub such as a garden and playground, possibly an undercover meeting area and/or cafe, where people can meet, and children can play. The land that would be saved by this model could then be used for well built, sustainable multilevel accommodation on public transport routes to take people to work, retail and further on to areas such as parks, recreational facilities, the CBD and the Mount.

Planning needs to consider the demographics of our future population where there will be a growth in young Maori families and the over 65s and levelling off of other groups. This needs to be incorporated into planning, canvassing the needs of these groups such as access to good health and education facilities, and places for social connection such as marae, community halls and sports and recreation facilities.

Intensification clearly needs to occur, but this needs to be in the form of affordable accessible and energy efficient houses, with a smaller footprint. There also needs to be a mixed model of accommodation, and an awareness of the ongoing issue of homelessness so that we can accommodate all groups in our city. Growth will have to be organic as sites gradually transition to higher intensity, ground stability needs to be assured, and people need to change their expectations from the NZ quarter acre dream. Red tape bureaucracy needs to be reduced to allow more affordable planning approval, at the same time as a robust city plan to ensure that developers are given clear guidance on acceptable development. Attention needs to be given to adequate green spaces and tree corridors to allow for recreation and community activities, good mental health, and the restoration of waterways and wildlife in the city. Good recycling and waste systems that have been initiated, need to be enhanced and entrenched. Industrial areas need to also be clearly demarcated to avoid urban sprawl and maximise land use. Renewable energy should be the norm, such as solar panels on all new builds.

Public transportation, as one of the key ways of reducing carbon output in our city, needs to be planned and executed now before full intensification takes place. This needs to include walkways, bikeways, dedicated bus lanes, possibly ferry services, trains and trams – or at least the future possibility of these – with an integrated and safe framework so that people can move easily without the need for cars. Cities such as Melbourne and Sydney which set out their public transport systems 150 years ago show us that good planning has become a vital part of a functioning modern city, which helps improve sustainability and quality of life for all.

We are not a big population, but we have an opportunity to do this well now, so that future generations can enjoy a great quality of life, in a sustainable environment, with great community resources and green spaces, public transport, clean air and water and a community where everyone has a place to live. Tauranga will be a city which people are happy to call their home.

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Carole Gordon MNZM

Submission ID: 42

Request to speak: Yes I would like to speak to my feedback

Select which chapter you'd like to provide feedback on:

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No I do not feel confident.

It is a big task - planning so far ahead is unrealistic

\* My philosophical view is that more population detail is required to focus the strategic parameters.

\* It is vital that we plan for who our people are and for the environment. We do know who our people will be - this should guide the urban footprint or built environment to create suitable liveable communities, A different view shaft from Connected Centres which is actually roads!

\* The assumed 'growth' scenario is unrealistic given global population ageing, workforce decline and increasing geo-political tensions.

Select which chapter you'd like to provide feedback on: Social Infrastructure and Wellbeing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

To reiterate- there is insufficient focus on planning for people.

The items under this heading eg sports fields, playgrounds assume that only children and young people have active lives.

Please ensure that ageism is not driving the perspective and that current adult and older people are catered for in such examples of investment.

This strategy should lead a longevity wellbeing focus- we cannot afford not too.



This, and generalised assumptions on the quality of urban spaces in delivery of Connected Centres is not satisfactory

Please include lifelong learning and community facilities for social connectivity and creativity.

Homogenised perspectives disrespect diversity and result in diminished social cohesion.

Select which chapter you'd like to provide feedback on: Housing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No I am not confident.

The market has failed.

We have a housing crisis

This region has failed to provision homes for an ageing population - to build affordable choice - to plan for later life lifetime homes and care.

The retirement village model is unsustainable and socially divisive.

Affordable Elder housing - own or rental in communities that care is a long term necessity.

Green field growth is not suitable for older peoples lives.

The Strategy does not meet the requirement for Elder homes - insufficient linkage between demographic reality and intensification planning.

Give known growth of numbers of older-old people there should be a whole section examining and catering to their health and social care delivery. Why is this connection not being made? We must tackle ageism.

It is a human rights issue and must be more adequately addressed.

Elders should be engaged in design and planning.

Anything else to add?

Growth is unsustainable - rapid urban growth creates poverty.

New Zealand urban growth story tells us that this is so.

Please initiate discussion on intensification urban planning models such as the Madrid square,

Please include a tree planting strategic plan - one house = one tree.

## SmartGrowth Strategy 2023-2073

### Online Submission

Name: Aimee Palmer

Submission ID: 43

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Three Waters and Other Infrastructure

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

I think more focus needs to be put on the infrastructure that is going to support the growth of the western bay/ Tauranga area. This is evident in the likes of Hamilton where there is significant issues with infrastructure capacity which have had to have been fixed now which is more difficult than if it was addressed at first hand.

Anything else to add?

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Bruce Conlon

Submission ID: 44

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Future Development Strategy

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

It seems that welcome bay is still the "Forgotten Suburb"

Select which chapter you'd like to provide feedback on: Housing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

We have large amounts of land up welcome bay, us and our neighbours combined. Given farming is getting squeezed from many sides, there seems to be a housing opportunity here, with beautiful land and views. There looks to be works planned on roading in future, is it enough and in the right areas of connection?

Anything else to add?

Please see the previous where Welcome bay, does see to continue to be forgotten in plans, and its such a beautiful and culturally rich area.

Also, infrastructure like a supermarket, shopping area, as the Welcome Bay village really is far too small for the populations needs, and travel to the city is congested. Environmentally the amount we have to drive each day as we don't have the services, multiplied by the population must be having a detrimental impact.

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Alan Liddell

Submission ID: 45

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Anything else to add?

Yes. Why do you not provide a fast, frequent, reliable, safe, rainproof, easy-to-pay-for and consistent public transport service BEFORE(!!) you accelerate your policy of making things more difficult for cars and thereby destroying CBD businesses? We can't afford rail, either underground or overground, so get rid of the big empty busses except at peak periods and use electric minibuses, possibly hybrids. At peak periods, use the big busses towards the inner city and move the minis to the suburbs and use them as morning feeders or afternoon takers for the big busses.

Stop blocking Cameron Road and its adjoining streets. Reduce the width of cycle lanes or remove them altogether. There is far too much space provided for a very few bikes and scooters. Provide good parking buildings instead of reducing parking spaces. Incentivise use of new mini buses by using congestion charges in the CBD excluding roads that by-pass the CBD like Takutimu Drive. All this should be obvious. I used to come into town from Bethlehem for lunch or breakfast regularly. Now I never do. I used to eat at downtown restaurants. Even though parking at night is easy, I am more likely now to go a restaurant at the Mount or here in Bethlehem as the Council is killing the central city and it is becoming less safe. I only now come to the CBD to attend my gym in 1st Avenue and, because I am already there, to shop at PaknSave and clear my PO box in 6th Av. Were it not for the gym (which I attend for the trainer there, not because of the location), I would switch my PO box address to Bethlehem, attend Aspire gym at Bethlehem

and shop at PaknSave at the Lakes. The parking is better at the Lakes, anyway. I do not want to speak to this as I think I would be wasting my time but you asked for transport feedback and I have the time to type a rant.

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Jon Sadler

Submission ID: 46

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Areas to be Protected and Developed Carefully

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

There seems a fundamental assumption amongst policy makers and planners in Tauranga that the large majority of people want growth. They don't. Growth in Tauranga certainly doesn't mean per capita increase in wealth and well-being. Resilient and sustainable places require green corridors and belts, and a focus on environmental and sustainable resource design and build, with pre-planned associated roads and infrastructure.

Select which chapter you'd like to provide feedback on: Urban Form and Centres

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

There is an assumption of planners that large-scale growth should be encouraged and accommodated. Most residents would disagree with this economic imperative. It provides no gain socially, environmentally or for most people in employment. There should be more of an emphasis on developing small and intimate business and social medium-density nodes that provide most of the social, economic and environmental services we need. Developing large urban sprawl that encourages massive growth and congestion should be discouraged. Planning for smaller-scale condensed settlements with a hub of services and alternative transport choices should be more encouraged.

Select which chapter you'd like to provide feedback on: Climate Resilience

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

More emphasis should be put on carbon footprint in building infrastructure and homes. Carbon consuming materials such as steel, concrete and polymers such as polystyrene should be discouraged, and wood and recycled products, and other natural fibres encouraged

Local government needs to build partnerships with organisations to provide incentives for businesses to be carbon neutral or carbon positive, and disincentives for operating heavy carbon footprints. Building resilience by offering incentives for small-scale businesses to operate locally to avert congestion and emissions encouraged

Anything else to add?

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Julian Fitter

Submission ID: 47

Request to speak: Yes I would like to speak to my feedback

Select which chapter you'd like to provide feedback on: Te Taiao - Environment

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

The plan makes all the right noises, but the reality of the detail is that no real priority is given to the environment or enhancing native biodiversity. The Te tumu development is right alongside the most significant river in the region with an important wetland on the opposite bank - it is not realistic to think that such a development will not have a deleterious effect on the river and the wetland - in addition there is the inevitability of another river crossing being build in the future and the additional danger of some form of marina development should Te Tumu be developed as planned.

Select which chapter you'd like to provide feedback on: Housing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Assuming tht the population growthw projections are valid, then there is a clear need to develop a much more cohesive housing and transport strategy. You suggest existing urban areas should aim for 30-50 dwellings per hectare, this is very low when it should be 50-100 if you are serious about developing affordable housing. Likewise that new growth areas should have a target of only 30 DPH, that is way too low. We know that we cannot develop an effective publiuc transport system if the housing density is too low - Serious densification is absolutely critical.

Your cartographer appears not to know where Paengaroa is situated, it is consistently shown as Pongakawa.

Paengaroa should be a key focus for development along with Te Puke, it already has the necessary Road and Rail infrastructure.



Select which chapter you'd like to provide feedback on: Urban Form and Centres

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

The UFTI model suggests using Te Puke as an eastern hub, and yet the plan does not include the necessary growth there, even though it has all the required infrastructure and services and so should surely be the key area to the east.

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

You talk about sustainability and effectiveness, and yet there is nothing in the plan that suggests you have any idea how to solve the transport issue in the region. If the population of the region is set to double and most of that growth is outside the Tauranga urban area, then quite clearly you need to build in an effective and efficient transport system.

That does not mean more cars as there is already no room for them. That must mean developing an effective public transport system:

1. Develop a really effective local bus network in and around Tauranga City - using mini-buses and hubs.
2. Develop Park and Ride services at all entry points to Tauranga
3. Develop a passenger rail network to take the strain off the roads
4. Look at other transport options such as light rail up Cameron Road.
5. Consider overhead Gondolas as an option

Select which chapter you'd like to provide feedback on: Areas to be Protected and Developed Carefully

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

This phrase does not make sense. If an area is to be protected, it should not be developed at all!

Any development needs to be done carefully, the alternative is unthinkable  
- I hope.

Select which chapter you'd like to provide feedback on: Economic Wellbeing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Our economic wellbeing is dependent on the wellbeing of our environment and that in turn is dependent to a large extent on our climate and that in turn will affect sea levels, a fairly critical issue in the BoP. We need to be absolutely sure that all our developments are focussed on minimising environmental impact and CO2 emissions - I do not get any sense that that is a priority, except in some fine words.

Select which chapter you'd like to provide feedback on: Climate Resilience

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

This has to be the key to everything.

Growth in itself is damaging to the environment and the climate, therefore we need to seek at all times to minimise the impact of growth on our climate  
- there is no evidence that this has been taken into account in the document.

Select which chapter you'd like to provide feedback on: Future Development Strategy

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

This has to be focussed on environmentally friendly industries, primary industries are inherently bad for the environment unless they are firmly focussed on minimising that impact. There is no evidence that this is the case.

Anything else to add?

I see very little evidence that this strategy is really taking into account the environmental and climate issues, and certainly not the risk from sea level rise or tsunamis.

## SmartGrowth Strategy 2023-2073

### Online Submission

Name: Tauranga Business Chamber

Submission ID: 48

Request to speak: Yes I would like to speak to my feedback

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

We appreciate that this strategy informs future planning processes such as city plans, social infrastructure planning, transport planning, local plans, and the annual plan and long-term plan. However, the objectives for transport and modal shift are at best, aspirational, but lack a transparent plan on how communities will achieve it. If SmartGrowth has a plan to achieve these targets, then the plan should be more transparent to gain more informed feedback from communities. SmartGrowth is an effective direction setting planning tool. It's weakness is in the delivery by the partners as they face push-back from communities in discussing the detail.

Select which chapter you'd like to provide feedback on: Economic Wellbeing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Overall, the wider business community likes certainty. While there are matters throughout this strategy that businesses would not support. On balance, and given the dire shortages of housing and employment zones, the business community would support the SmartGrowth partners to focus on delivery and providing certainty to aid business investment. We support that the focus should be less on business attraction; instead, focus on maximising employment density and advancing the innovation and R&D ecosystem to improve the productivity of our existing and natural strengths. We support SmartGrowth's recognition of how interconnected the WBOP subregion is with the upper North Island.

Select which chapter you'd like to provide feedback on: Housing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Housing is critical for the region staying economically competitive. Based on current projections, the supply and demand trend of local housing varieties is becoming a major issue for businesses (e.g. staff are asking for higher wages to keep up with rising mortgage and rental costs).

Although it's out of scope, we support SmartGrowth recognising that a growing proportion of the WBOP subregion's workforce will be living in the Waikato and commuting on SH29. Travel times from Papamoa/Te Puke into Tauriko and Tauranga's city centre is currently similar to travelling from Matamata/Morrinsville - where rentals and house values are nearly half the price.

Select which chapter you'd like to provide feedback on: Future Development Strategy

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

SmartGrowth is currently the best joint local/central government planning tool that is available. It has an established brand that doesn't need to change for the sake of it. The challenges for SmartGrowth have always been with the implementation by the individual partners. This is discovered by how they engage with communities on the detailed plans (e.g. rates, RMA plans, budgets, local infrastructure etc.) and their elected representatives. SmartGrowth has often been leveraged by the usual stakeholder groups as an alternative channel to amplify their voice where the general public does not usually show their views. However, as we've recently seen with TCC's Plan Change 33 in Mount Maunganui.

We understand that this plan will inform future council planning processes such as city plans, social infrastructure planning, transport planning, local plans, and the annual plan and long-term plan. However, some local stakeholder groups may see this strategy as having more legal status. We're not focusing on the detail - this will happen through the appropriate processes. As a joint planning and directional tool, we support the overall direction of this document as it provides some direction to business' longer-term planning.

We are happy to use the Chamber's advocacy voice to Government to improve local infrastructure planning, financing, funding, and speed of delivery challenges, as noted in this document.

Anything else to add?

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Don Thwaites

Submission ID: 49

Request to speak: Yes I would like to speak to my feedback

Select which chapter you'd like to provide feedback on: Future Development Strategy

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Further investigation of business land development at Apata is required. Possible Industrial land identified south of Omokoroa is better suited as Omokoroa residential stage 4 and land south of TNL Stage 2 running back to Whakamarama should be investigated as mixed lifestyle/residential to be Omokoroa stage 5.

If a secondary school is to be built at Omokoroa, these extended residential growth areas would support the provision of these new schools.

The Apata area is worthy of investigation for industrial development.

Residential growth in Katikati and Omokoroa would supply housing for this area.

Double tracking of the rail between Apata and Tauranga over the next 50 years would support the port of Tauranga and provide commuter capacity between Apata and Tga / Te Maunga / Te Puke

A second Kaimai rail tunnel for resilience and capacity would enhance this transport corridor.

Te Puna is not a suitable location for any further industrial activity.

Long term (30 years) - a commercial centre to serve a residential Te Puna requires planning. The protection of the Bayfair commercial area from the late 1960's is a great example of long term planning.

Anything else to add?

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: David lucas

Submission ID: 50

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Housing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

There is nothing smart about putting intensive housing in the Bay. For a population density in New Zealand it is 20 per square kilometre. England is 434. Why are we insisting on putting people closer and closer together causing more stress. Don't we have enough mental health issues already. Labours Phil Twyford, started the ball rolling when he convinced, or told the Bay councils to go up and intensify. One only has to look at what's happened in Auckland as an example. With all the infilling of ugly 3 story or more boxes, just SHOCKING. Surely we have enough land available here in NZ to not have to do this. There does seem to be a lot of emphasis on producing homes for Maoris. As I believe we supposedly live in a multi cultural society, aren't all the many races who live here as deserving of a home to live in. Not sure whether you realize we have a new government. One of their policies will be to look at peoples needs, not based on their ethnicity when it comes to housing, health or such like. Makes sense to me!.

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

There seems to be no mention of upgrading the SH2 intersection before increasing the housing in Omokoroa. With more housing, obviously comes more traffic, and more frustration. A Sensible reduction in building further housing would be a good start. Lets get the infrastructure right first. But you know this.!

Select which chapter you'd like to provide feedback on: Three Waters and Other Infrastructure



We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Totally against 3 waters, or 10 waters, or affordable water, whatever, take your pick. Before we waste any more taxpayers money on this, it should go back to the councils for discussion with the community.

We the rate payers have payed for it, and should be listened too but it seems that we don't count.

As one of the rate payers who pay a extra ordinary amount each year, we should have the option to, HAVE A SAY and to be listened too. but it seems, in my experience, that even when we have overwhelming support against some policies such as the 3 waters or Maori wards, they are still passed. Both un democratic, shame on you.

As our esteem Mayor said so arrogantly. This is about making the right decision not the popular one.

I rest my case.

Select which chapter you'd like to provide feedback on: Climate Resilience

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

I believe there are better projects to spend our hard earned money on, than the so called climate change.

We humans here in NZ are not going to make one scrap of difference to the overall world climate problem, if there is one.

Select which chapter you'd like to provide feedback on: Tāngata Whenua

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Not interested

Anything else to add?

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: Beth Bowden

Submission ID: 53

Request to speak: Yes I would like to speak to my feedback

Select which chapter you'd like to provide feedback on: Economic Wellbeing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

In my view the likely effects of global conditions-change (the "Global context", pp. 28-29) on economic projections that underpin this Strategy are insufficiently accounted for. The continuing assumption seems to be that growth will pay for growth and that markets can and will indefinitely adjust, in their infinite nimbleness and flexibility, to changing circumstances. The history of the industrial revolution (to offer a modern example) shows us that, absent other extrinsic pressures, both producers' and consumers' enlightened and immediately proximate self-interest tend to prevail.

- The shortcomings and challenges outlined in the Strategy are evidence of the gaps that can develop in such circumstances
- The analytical charts on page 136 are certainly useful but it is unclear where the projected employment numbers come from
- "Taking account" of neighbouring regional and sub-regional economic development plans is an inadequate acknowledgement of Tauranga's place in the "golden triangle" alongside Auckland and Hamilton
- Without an Implementation Plan, how is the balance to be struck between the various land use pressures and changes outlined in the Strategy? Are we to continue to rely on ad hoc decisions made via private Plan Change applications? If so, on what principles do decision-makers (and private planning consultants) evaluate private landowners' economic interests against agreed (and relatively stable) criteria?
- What assumptions have been made about central government's ability or willingness to fund more of the growth that its policies (particularly immigration into the north of the North Island) have created?
- In general, without a Funding and Implementation Plan, how can those trying to meet these strategic ambitions sort out their priorities? (This will be a recurring theme in my submission.)

Select which chapter you'd like to provide feedback on: Housing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

At least because it gathers the bleak realities of the Bay of Plenty's housing crisis together in one 17-point list, the Strategy is to be commended. Merely re-stating the challenges, however, is insufficient. The Strategy offers no path towards any real prospect of an increase in public housing supply or tenure law reform that might lead to the stated aspiration of increasing affordable housing.

As with economic development in general, implementation, funding and financing are the missing fundamentals in this part of the Strategy. There is also an important community discussion still to be had about the nature of intensification itself and the range of housing typologies needed for our 15-minute neighbourhoods. I support the priority given to the issue, but there are few apparent pathways to resolving it. I note in passing that, as the fifth biggest city in New Zealand, located on the fourth smallest land area, some form of intensification seems already to have taken place.

It is also unclear whether the proposed TCC Plan Change 33 has been assumed as part of the Strategy or, if not, what its impact would be if it were to go through.

Another concern about this section of the Strategy is the absence of 'quick wins'. We need more housing, now. The problems and challenges have been exhaustively examined and endlessly discussed. More devolved solutions, taking advantage ("Connected Centres") of patterns of settlement where clusters of 2-3000 people already live amongst existing transport and water reticulation systems, should be being examined now and not relegated to the Future Development Strategy section.

- Can we establish with some clarity just what the projections are? Population growth is variously described within the Strategy – "an envisioned population scenario of 400,000 people over the next 50 plus years" (p.12); "projected to reach between 246,100 and 317,500 people in the next 30 years" (p. 21). I can see that these are not necessarily incompatible, but the use of two differing time-frames may not assist clear policy formation and implementation

- Housing requirements are similarly confusing. The TCC seems to rely on 19,000 dwellings expected of its intensification efforts but there are public pronouncements of 25,000 potentially available in the western corridor (provided a new road is put out there). The Strategy discusses shortfalls in supply but does not actually put forward scenarios as to how many houses would be enough: "These numbers are based on the likely expected population (Stats NZ medium-high projections October, 2022) which generates overall housing demand. The housing demand includes the existing housing shortfalls identified as at July 2022, and the additional 15% and 20% required as the competitiveness margins in the NPS-UD" (footnote, p.142).
- Distinctions between urban-intensified housing typologies and rural needs (clusters around transport and service hubs, accommodation for itinerant workers) are inadequately addressed
- There is also over-much reliance on assumptions that Maori land is an easy source of supply for development. History tells us that is not the case. Once again, the absence of an Implementation and Funding Plan is evident. I would advocate for a significant and separate Plan to be worked through the Tangata Whenua Forum on this matter.

Select which chapter you'd like to provide feedback on: Rural

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Given that the rural hinterland is such a large part of the region, it receives relatively cursory analysis in the Strategy. The sense of value, however, that the Strategy places on this land is important. In my view there exists considerable scope for building stronger understanding between city and country communities of their mutual reliance on each other.

- I advocate for more and better inclusionary zoning principles to combat the ad-hoc 'creep' at the margins of peri-urban, industrial and commercial development areas by way of Private Plan Change applications. This is especially important if Connected Communities becomes an accepted element of the District Plan
- Monitoring and enforcement of land use rules requires to be accepted as an active aspect of Councils' work. Over-reliance on a complaints

process generated by vigilant members of the public allows too much latitude to rogue operators

- The Strategy implies, but does not make explicit, the important contribution made by rural communities to environmental protection and conservation. This already provides a well-established coalition of interests between urbanites and country folk and should be acknowledged

Select which chapter you'd like to provide feedback on: Urban Form and Centres

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

- How do the stated figures for connected centres ("200,000 additional people creating nearly 40,000 new jobs and 95,000 new homes across the sub-region" map on to those cited in other chapters of the Strategy?
- Absent inclusionary zoning or even more prescriptive planning controls, how is the impact of competing land use to be managed?
- Assuming reliance is placed on spatial planning processes (as per the Ōtūmoetai Case Study), how are these embedded into the Council planning process?

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

This chapter of the Strategy offers only an inferential connection with housing (and settlement patterns in general). This should be remedied – the two are closely integrated.

I choose to read the four key challenges as being of equal, not sequential, importance but I note that the Climate Resilience chapter (at p.68) makes it clear that transportation is the major factor if serious GHG emissions reduction is intended.

I regret the emphasis on roading and wheeled vehicles and the absence of any consideration of rail and water-based transportation options. That said:

- Are private vehicles to be the only means of connection between our Connected Centres?
- How, exactly, are designs for better public transport to be achieved in the Councils' planning processes? Is this, too, to be left to the Implementation and Funding Plan?
- How is it that implications for rapid transit afforded by the TEL and TNL, supplemented by local shuttles and park-and-ride options along rural highways, are not incorporated in the Strategy?

Select which chapter you'd like to provide feedback on: Social Infrastructure and Wellbeing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

It is very difficult, as the Strategy itself demonstrates, to identify the important elements at work here and I applaud the emphasis placed on networks as well as health care and schools. It places strong emphasis on physical infrastructure and facilities and the link between these and "an established population". An unstated challenge, however, is the relationship between the dynamic demographics described throughout the Strategy and the continuing appreciation of the long-term benefits of public parks, community centres and other gathering places (whether actual or virtual).

Possibly because of its emphasis on bricks and mortar, the Strategy is light on the specific necessities of supporting an ageing population as well as an increasing number of young, predominantly Maori, families within communities whose increase is largely due to migrants (both New Zealanders and elsewhere).

- Newcomers becoming part of an established population: does this require a 'go carefully' approach of its own?
- What specific indicators of social wellbeing are to be the measures of the success of this Strategy?
- Can we use social wellbeing as the starting point for other areas of common ground: transport, housing, and health (including water and land use change/conservation)?

Select which chapter you'd like to provide feedback on: Areas to be Protected and Developed Carefully

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

The maps make the clear point that, despite the acknowledged desirability of the Bay of Plenty as a place to live, that all of the 'easy land' is already in use. In other words, geography has already imposed a limit to growth. The so-called "Growth directives" on page 51 therefore seem mis-titled.

Select which chapter you'd like to provide feedback on: Climate Resilience

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

I have no particular argument to make with the description provided in this chapter, except to say that, at least until Cyclone Gabrielle earlier this year, there was only minimal evidence that its principles – and its costs – were being taken seriously. I do think the focus is on the right things, but I think that a sober assessment of likely costs by way of an Implementation and Funding Plan is seriously lacking.

Select which chapter you'd like to provide feedback on: Te Taiao - Environment

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

Once again, no-one could argue with description provided but the growth directives seem highly qualified and privileging of human settlement ambitions. And it is barely plausible to offer a directive offering "growth of the western Bay of Plenty [to be] within environmental limits".

- What does the term "environmental limits" even mean?

Select which chapter you'd like to provide feedback on: Three Waters and Other Infrastructure

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

I am personally dismayed that the reforms proposed by the previous government foundered so comprehensively. As a resident of Western Bay, I

feel fortunately situated and confident in a high-quality, relatively low-cost reticulated water supply system. But I am conscious of Tauranga City's dependence on Western Bay's water and feel we have lost years of valuable planning time.

- What investigations or analysis have been done to establish whether there is, in fact, enough water for 400,000 people?

Select which chapter you'd like to provide feedback on: Future Development Strategy

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

I accept the requirements and the constraints imposed by legislative and national policy statements and that both SmartGrowth and our Councils must work within these. Especially as we transition between governments and move to a political environment that may well change a number of the settings that underpinned this Strategy, I welcome further discussions and debate beyond the Special Consultative Procedure (see following remarks).

Select which chapter you'd like to provide feedback on: Tāngata Whenua

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

I defer to local iwi's rights and responsibilities to determine their own attitudes to this Strategy.

- I endorse Pirirakau's submission, particularly at paragraphs 13, 14 15 and 24
- I draw your attention to my previous remarks concerning tangata whenua's involvement in planning assumptions made about Maori land use and availability for development

Anything else to add?

This is a personal submission. But it comes from my experience on the Social Sector Forum disestablished by SmartGrowth in August 2022 and my service as Secretary of Te Puna Heartland Incorporated since 2005. I also stepped down from the Board of Te Tuinga Whanau Social Services Trust in August this year after eighteen years of Board membership. I have no formal



mandate from any of these, but I have endeavoured to gather up views and opinions from sources in all of them.

This submission is therefore my own, but it is a considered statement, and one that asks, in particular, for a wider scope of engagement on this Strategy, one that is not unduly constrained by the formalities of the Special Consultative Procedure (SCP) under the Local Government Act 2002. In saying this, I accept of course that SmartGrowth's function is delineated as advisory and as offering a framework and guidance to the planning processes to be undertaken by the Bay of Plenty's local authorities. My years of experience with these processes however indicate some significant deficiencies in Councils' ability to adjust to and incorporate in their District and Regional Plans the grassroots knowledge, understanding and deep love for the places in which local people live, work, play and study. Precisely because of its advisory role, SmartGrowth is well placed to provide Councils with the benefits of critical analysis and courageous insights from outside standard politics and bureaucracy. It should be valued, not dismissed, for doing so.

In this submission I intentionally made only rather general points, often in the form of questions. I did so in the hope that there may be opportunities beyond the legislated process to answer some of these questions and to establish a more consensus-based, joined-up strategy that allows citizens to trace clear connections between their present understanding of their place(s) and what comes to pass in their 30-50 year future.

#### Some points on consultation/engagement

I note that under the National Policy Statement on Urban Development (NPS-UD) SmartGrowth is required to consult only with local authorities, central government agencies and tangata whenua. The evident gap that remains – the opinions and viewpoints of the general community – is to be dealt with under the SCP mentioned above. I note that the bare month stipulated under s. 83 (1) (b) (iii) has been allowed for this consultation. I also however draw your attention to the 'catch-all' provision at s. 83 (c):

This section does not prevent a local authority from requesting or considering, before making a decision, comment or advice from an officer of the local authority or any other person in respect of the proposal or any views on the proposal, or both.

as well as the provisions of s. 83AA. It would, in the absence left by the SmartGrowth Forums, be gratifying to create some combined consultative workshops that brought together the various, compulsorily-consulted parties with community-based experts across a range of fields. Perhaps by this means a less silo'd, evidence-shared relationship between the pressures of growth, its benefits and and its limits, could be achieved.

It is also possible that, by escaping the constraints of an on-line survey that seems to be the only route for making a written submission within the stipulated timeframe, we could accomplish a richer and more integrated sense of the growth management principles that are in play. Further, it would be really very useful if the structure of the survey – the ordering of its topics, for instance – could mirror that of the Strategy Document itself. There is an apparent internal logic to the “story” of the Strategy. The survey’s approach encourages a single-issue response from submitters. I think that a Strategy offering a 30-50 year time horizon should acknowledge and foster attitudes that demonstrate how everything is connected to everything else. Perhaps the Forums had indeed done their dash. But they left a gap that is not beyond our abilities to fill.

## SmartGrowth Strategy 2023-2073

## Online Submission

Name: John Robson

Submission ID: 54

Request to speak: Yes I would like to speak to my feedback

Select which chapter you'd like to provide feedback on: Areas to be Protected and Developed Carefully

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Select which chapter you'd like to provide feedback on: Tāngata Whenua

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Select which chapter you'd like to provide feedback on: Climate Resilience

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Select which chapter you'd like to provide feedback on: Te Taiao - Environment

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Select which chapter you'd like to provide feedback on: Rural

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Select which chapter you'd like to provide feedback on: Urban Form and Centres

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Select which chapter you'd like to provide feedback on: Housing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Select which chapter you'd like to provide feedback on: Three Waters and Other Infrastructure

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Select which chapter you'd like to provide feedback on: Social Infrastructure and Wellbeing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Select which chapter you'd like to provide feedback on: Economic Wellbeing

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Select which chapter you'd like to provide feedback on: Future Development Strategy

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

No

Anything else to add?

Multiple lists of 'challenges', 'outcomes', 'directives', etc. are not a strategy...

There is too little evidence to give me confidence that the aforementioned lists have been through a/any process that might produce a coherent and, more importantly, viable strategy that will ensure an environmental and economically sustainable future for the sub-region...

Sadly, this failure, given my knowledge and experience of SmartGrowth, comes as no surprise.

That said, and to be fair, I don't know whether such a future for the sub-region is even possible given the fact that any strategy for the sub-region is, literally, subject to the strategy (and consequent/subsequent statutes, policies and frameworks) of central government.

And, as locally, there is little evidence that the government of NZ has been, or is currently, both willing and able to develop and deliver an environmental and economically sustainable future for our country.

## SmartGrowth Strategy 2023-2073 Online Submission

Name: Peter Holyoake  
Submission ID: 55

Request to speak: No I would not like to speak to my feedback

Select which chapter you'd like to provide feedback on: Climate Resilience

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

The Strategy Document makes mention of most of the important impacts of climate change and correctly starts with recognition of the importance: "Climate change is the biggest challenge of our time". However, there is no plan of action to address the large contribution to climate change from agriculture in WBoP.

### 4. SOCIAL – Location of Marae

CONCERN: Many Marae are located on land close to sea level. This land and these Marae will flood before most Pakeha settlements.

#### RECOMMENDATIONS:

a). Anticipate the flood of BoP's Marae, where they are close to sea level. Some marae are already experiencing floods. Plan and budget to assist the relocation of these marae.

### 5. ENVIRONMENTAL / SOCIAL - Heat Management – public spaces

CONCERN: Summer temperatures will continue to increase in future years.

The use of dark horizontal hard surfaces, like asphalt, will create very hot areas and lead to heat islands. See the public comment on the use of asphalt for the new Papamoa Beach walkway (e.g. <https://sunlive.co.nz/news/327098-p--p--moa-residents-concerned-over-asphalt-pathway.html>)

#### RECOMMENDATIONS:

a). Avoid asphalt use.

- b). Consider extensive use of tree-lined streets and stands of trees to reduce heat build-up. Maximise the use of light-coloured parking areas and road surfaces to reflect light and heat.
- c). Consider the Australian trend to use white as a roof colour for Council, commercial and residential roofs.
- d). Avoid high rise buildings and heat traps – see the following article about Singapore (not all relevant as Singapore is a high-rise city) - <https://www.nytimes.com/interactive/2023/09/18/world/asia/singapore-heat.html>

ENVIRONMENTAL / SOCIAL – Heat Management – residential

CONCERN: TCC / WBoP sub-region is an area favoured by retirees, evidenced by the presence of many retirement villages and care homes. This sector of the population is particularly vulnerable to heat. Summers will be increasingly hotter in the future. (See, for example: <https://www.theguardian.com/australia-news/2023/oct/01/sydney-smashes-1-october-heat-record-as-victoria-fights-bushfires>) and <https://www.theguardian.com/world/2023/aug/20/high-temperatures-central-us>)

RECOMMENDATIONS:

- a). Require all new developments for older people to include passive cooling features – e.g. deep covered verandas, deep window eaves – to allow entry of winter sunlight into the building and exclude entry of summer sunlight. Note that future climate change will bring extended drought periods and loss of hydro power, so passive construction features will provide resilience to climate change.
- b). Consider the provision of tree-shaded walkways, especially near retirement villages.
- c). Consider the potential future use of community halls as “Cooling Centres” as has been done during recent heatwaves in the United States (see: <https://www.washingtonpost.com/weather/2023/07/15/cooling-centers-limitations-heatwaves-cities/> . This could include duplicate air conditioning systems, power generators (e.g. solar panels and battery storage), etc.
- d). Ensure that each Connected Centre has a community hall ready to provide this service.

6. ENVIRONMENTAL - Storm surge, future rainfall and future development locations

CONCERN: This concern is most relevant for coastal developments and for developments on flat land, near watercourses. The KRUGA is raised above sea level, with few flat areas. Parts of this development area are up to 100

metres above sea level. This is positive in that it will provide urban expansion areas, which are more climate resilient than existing and recent urban expansion areas around Tauranga. For example, Climate Central published a world map in 2019, which shows projections of flood areas for the year 2050. This map is discussed in a 2020 Newshub article (see link below) <https://www.newshub.co.nz/home/new-zealand/2020/01/alarming-new-map-shows-the-devastation-rising-sea-levels-could-cause-in-new-zealand.html>

A screen-grab of a map showing the projected 2050 flooding in the Tauranga area is reproduced from the Newshub article below: <https://www.newshub.co.nz/home/new-zealand/2020/01/alarming-new-map-shows-the-devastation-rising-sea-levels-could-cause-in-new-zealand.html>

(image does not copy here - please see article)

#### RECOMMENDATIONS:

- a). Avoid development in coastal areas, which could be impacted by storm surge in the future. Note that such areas are likely to be identified as vulnerable to tsunami risk today.
- b). Grant no more building consents in low lying coastal areas of flood zones. Classify these as "No-Go" areas – i.e. suitable for grazing or short term crops.
- c). Consider granting no more building consents in flat areas, which have nearby water courses.
- d). Past rainfall quantities will no longer be a reliable guide for the design of future storm water systems. Oversize all new storm water systems. After some time they will flood. That time can be prolonged by being cautious today.

#### 7. ENVIRONMENTAL - Wind damage management

CONCERN: New Zealand is experiencing increasingly extreme weather events. As climate change develops the frequency and magnitude of storms will increase. Recent storm experience in New Zealand includes slips and broken power lines. Power lines are mostly aerial (pole borne).

#### RECOMMENDATIONS:

- a). Include for the burial of power supply cables in new development areas where ground is stable.
- b). Include the requirement for slip mitigation for construction on ground where stability can be compromised by extreme rainfall.
- c). If not already done, construct all new water mains in plastic (Alkathene, Low Density PolyEthylene (LDPE), etc.) These materials offer some elasticity compared to iron and steel.



d). Tree belts reduce wind speed – as BoP knows from growing Kiwi fruit and Avocado – maintain existing trees. Plant more trees in copses in new development areas.

Plans to address the more immediate impacts of climate change should prioritise the older population (as the sub-region is favoured by the elderly) as this sector of the population is more susceptible to heat. Also, many marae in the sub-region are in low lying areas and will have (or have now) higher flood risk - relocation plans should be developed as a priority.

Select which chapter you'd like to provide feedback on: Urban Form and Centres

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

I think that the Connected Centres approach makes for a very attractive character to the town centres of Tauranga and surrounds and I fully support the continuation of this approach. Although mentioned elsewhere in the strategy document, it is obvious that the provision of the frequent bus service between connected centres will facilitate the reduction of private transport and improvement in air quality as a result, improving the environment in each connected centre.

For connected centres that are not near the new Civic centre I have some comments regarding the provision of community facilities and the location of marae::

### 3. SOCIAL - Community Centres

CONCERN: Future residential development areas will need access to centrally-located facilities. For example, recent development areas – The Lakes and Tauriko do not have communal external AND internal spaces for community events (playground, park or reserve and community hall) in or close walking distance to their hubs.

#### RECOMMENDATIONS:

a). TCC has an excellent record of providing external Reserve space. Continue this in new developments.

b. Many existing community hubs (e.g. Greerton, Matua) have schools and community halls close to each other (within easy walking distance). This facilitates parental attendance at public meetings in the late afternoon. Ensure that new development areas include a community hall. Note – if the

school is close, the school hall could be shared by the local community after school hours if access arrangements were carefully designed.

4. SOCIAL – Location of Marae

CONCERN: Many Marae are located away from existing hubs / connected centres.

RECOMMENDATIONS:

a). Many marae will need to be relocated to avoid flood risk. Consider the provision of land for the relocation marae in the new development areas.

Select which chapter you'd like to provide feedback on: Transport

We want you to feel confident that we have a plan in place to manage growth. Do you think we're focusing on the right things?

In general, yes. The present areas of congestion and the need for improved infrastructure are both recognised in the Strategy document. The need for enhanced infrastructure is now, preferably before new development areas.

1. Road development priority:

CONCERN: Existing major commuter routes, which will serve the Tauranga Western Corridor development areas, are already congested by existing traffic:

- a). Cambridge Road joining SH29 – especially in the morning
- b). SH29 to Tauranga Crossing - in the morning
- c). Tauranga Crossing to the SH29 junction with Cambridge Road - in the afternoon / evening
- d). Tauranga Crossing to Pyes Pa along SH29.

Further development in the Western Corridor will encourage traffic in the Tauriko and Pyes Pa areas and will add to this congestion UNLESS alternative routes are made available FIRST.

RECOMMENDATION: Prioritise the construction of a direct link from SH29 into the Tauriko Industrial Estate (Gargan Road, as an example, may have been a direct link, if it was large enough with good access / egress from SH29). This will reduce congestion at a, b and c above.

2. Alternatives to private transport:

CONCERN: Tauranga road congestion is already causing delays and this impact will increase due to increasing traffic density. This causes increasing loss of productive work hours and increasing road pollution:

## RECOMMENDATIONS:

- a). Construct a Bus station – perhaps at the Crossing.
- b). To relieve congestion and vehicle exhaust pollution please consider augmenting the number of bus routes to serve Greerton, Tauriko Industrial Area, CBD and the suburbs of Pyes Pa, The Lakes, larger Tauriko and the new KRUGA – perhaps locating a bus terminus at Tauranga Crossing (as above). Consider the inclusion of bus stopping bays in the existing and new roads.
- c). Implement a park and ride scheme to minimise the private vehicle congestion and pollution into the CBD. Parking for commuter vehicles could be provided, possibly at Tauranga Crossing, with frequent rush hour bus services into (and out of) the CBD – along a major business access route like Cameron Road / Maleme Street. The Crossing and the Tauriko Industrial area are well located to act as a public transport hub for the Tauranga Western Corridor developments.

Anything else to add?

Please hold in mind, during future decision processes, the speed at which climate change is bringing weather extremes to all parts of the world.. The demand for additional accommodation in BoP will grow as other areas of Aotearoa become uninhabitable - the relatively sheltered location of Tauranga and WBoP will be increasingly sought after. The importance of incorporating climate resilience into all future developments cannot be overstated. Making this resilience passive (not requiring a power source) or self-sufficient (power and water generated on site) will avoid the losses of supply already seen recently in Wellington, Auckland and Nelson storms and floods.



## TAURANGA NATIONAL COUNCIL OF WOMEN.

### PROVIDING A PLATFORM FOR A UN DECADE OF COMMUNITY INITIATIVES

The UN Decade of Healthy Ageing 2021-2030 is a relevant opportunity to bring a collaborative focus to actions that value Elders and enhance health and community ecosystems for the wellbeing, dignity and independence of Elders their families or whanau. Decade initiatives will strengthen integrated care and community social cohesion.

### SUBMISSION

#### DRAFT SMARTGROWTH STRATEGY 2023

The National Council of Women Tauranga branch has participated in SmartGrowth processes since inception. It has valued the opportunity for input.

Similar to other national and global organisations NCW Tauranga is providing leadership efforts in social and policy change through the goals of UN Decade of Healthy Ageing 2021-2032. A Decade Forum has been established to provide a platform for action.

The purpose of this submission is to highlight the urgency for more focus on the development of community infrastructure to enable the independence dignity and wellbeing of older people as Elders and Kaumatua. It seeks, smart sustainable and inclusive limits to growth. Further it emphasises that a 21<sup>st</sup> Century urban agenda must apply an age-friendly approach.

The ageing of our population in the Western Bay of Plenty Sub-region is a major structural transformation that significantly impacts on social, economic cultural and environmental well-being. It is widely recognised that the built environment shapes the way people of all ages live, work, learn, play and age.

The UN Decade key action areas are relevant to SmartGrowth, providing a unique opportunity to be transformative and responsive to changing needs. They include: combatting ageism, age-friendly environments, integrated care, long term care.



National Council of  
Women of New Zealand  
Te Kaunihera Wahine o Aotearoa

There are initiatives underway in our region which will be strengthened by the SmartGrowth Strategy giving more detailed focus to impact of the changing population profile of the sub region.

To support greater understanding and the scope of challenges the National Council of Women proposes that the SmartGrowth Strategy :

1 Include **Population Change** as a key challenge.

2 Include more detail on a strategic approach to:

- Who our people are now, and in the future (disaggregating data).
- How infrastructure can best serve the diverse needs of more older people.
- How Elders can be engaged in co-design processes.
- The affordability of growth given a growing sector of older residents.

3 Give attention to, and seek to better integrate the actions of:

The Governments' ***Better Later Life Strategy 2019 -2034.***

***And Age -friendly Urban Places Guide.***

4 Adopt and apply the **UN Decade of Healthy Ageing Guiding Principles** as a basis for strategic planning. (attached)

The National Council of Women seeks to advance the efforts of the Decade Forum and suggests that SmartGrowth and partner Councils collaborate to achieve community environments where everyone can age well.

#### **NCW seeks to speak to this submission**

Pauline Bennett

President

National Council of Women Tauranga

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ph. 027 472 8556

<https://www.decadeofhealthyageing.org/>



TAURANGA NATIONAL COUNCIL OF WOMEN.

PROVIDING A PLATFORM FOR A UN DECADE OF COMMUNITY INITIATIVES

The UN Decade of Healthy Ageing 2021-2030 is a relevant opportunity to bring a collaborative focus to actions that value Elders and enhance health and community ecosystems for the wellbeing, dignity and independence of Elders their families or whanau. Decade initiatives will strengthen integrated care and community social cohesion.

[www.undecadeofhealthyageingtauranga.com](http://www.undecadeofhealthyageingtauranga.com)

Table 1. Guiding principles for the Decade of Healthy Ageing

Interconnected and indivisible	All implementing stakeholders address all the Sustainable Development Goals together instead of a list of goals from which they pick and choose.
Inclusive	Involves all segments of society, irrespective of their age, gender, ethnicity, ability, location or other social category.
Multistakeholder partnerships	Multistakeholder partnerships are mobilized to share knowledge, expertise, technology and resources.
Universal	Commits all countries, irrespective of income level and development status, to comprehensive work for sustainable development, adapted to each context and population, as necessary.
Leaving no one behind	Applies to all people, whoever and wherever they are, targeting their specific challenges and vulnerability.
Equity	Champions equal, just opportunities to enjoy the determinants and enablers of healthy ageing, including social and economic status, age, gender, place of birth or residence, migrant status and level of ability. This may sometimes require unequal attention to some population groups to ensure the greatest benefit to the least advantaged, most vulnerable or marginalized members of society.
Intergenerational solidarity	Enables social cohesion and interactive exchange among generations to support health and well-being for all people.
Commitment	Sustains work over the 10 years and into the longer term.
Do no harm	Commits countries to protect the well-being of all stakeholders and minimize any foreseeable harm to other age groups.





**Te Tāhuhu o  
te Mātauranga**  
Ministry of Education

### Submission on the draft Smart Growth Strategy 2023-2073

**To:** Smart Growth  
**From:** Jayne Taylor-Clarke (Acting Director Land Investment and Planning, Ministry of Education)  
**Date:** 20 October 2023  
**Subject:** Submission on the draft Smart Growth Strategy 2023-2073

#### 1. Background

This is a submission to Smart Growth on the draft Smart Growth Strategy 2023-2073 (the draft Strategy). The Future Development Strategy (FDS) for the Smart Growth sub-region is included as Part 4 of the draft Strategy.

The Ministry of Education (the Ministry) is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing. The Ministry is therefore a considerable stakeholder in terms of activities that may impact on existing and future educational facilities and assets in the Western Bay of Plenty sub-region.

#### 2. Overarching Comments – draft Smart Growth Strategy 2023-2073

The Ministry holds several key roles as Crown Agency, provider/developer of additional infrastructure and landowner relating to the provision of social infrastructure across the education system. In order to plan for education requirements to support well-functioning urban environments, the Ministry seeks to understand the likely location, quantum, timing and type of growth in the region. The draft Strategy is a key document to assist the Ministry in our planning.

The Ministry thanks the Smart Growth partnership for the opportunity to make a submission on the draft Strategy. The Ministry has valued the opportunity afforded by the Smart Growth partnership to be involved in the development of the draft Strategy.

The Ministry looks forward to continuing to work with the Smart Growth partners in the development of the Implementation Plan for the draft FDS, subsequent structure plans, and any future Regional Spatial Strategy.

The purpose of our submission is to broadly support the draft Strategy and FDS and to seek clarification on a number of matters.

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[education.govt.nz](https://education.govt.nz) [temahau.govt.nz](https://temahau.govt.nz)



**Te Tāhuhu o  
te Mātauranga**  
Ministry of Education

### 3. Part 1 - Vision, Objectives and Transformational Shifts

The Ministry supports the Smart Growth vision that Western Bay is a great place to live, learn, work and play. In particular the Ministry is supportive of social and community well-being being at the heart of planning for growth in the Western Bay of Plenty sub-region. The accompanying objectives which address environmental, cultural, social and economic well-beings are also supported.

The Ministry is broadly supportive of the identified transformational shifts which will guide the priorities in the Implementation Plan. In relation to Transformational Move 6 (Radical change to the delivery, funding and financing model for growth), the Ministry has a particular interest in exploring options for shared service models for social and community infrastructure.

**Relief sought:** Retain the vision, objectives and transformational shifts as notified.

### 4. Part 2 – The Growth Challenge

The Ministry notes the significant challenges, but also the opportunities for the sub-region when planning for urban growth. The Ministry is supportive of the Connected Centres growth scenario which would see growth occurring in a more intensive way to support a well-connected, multi-modal transport system, and to plan around residents having access to social and economic opportunities within a 15-minute journey time and wider sub-regional opportunities within 30-45 minutes.

**Relief sought:** Retain the Connected Centres growth scenario as notified.

### 5. Part 3 – The Spatial Plan

#### 5.1 Chapter 1 Areas to be protected and developed carefully

The Ministry supports the approach of ensuring that development is directed away from areas where there are critical constraints to development or intrinsic environmental and cultural attributes that must be protected from future land development. The precautionary approach to growth in areas with natural hazard susceptibility and other land constraints is also supported.

Some of the maps are more difficult to read than others because of the layering of growth areas on top of the 'no-go' and 'go-carefully' layers. It would be helpful if the 'planned' and 'potential long-term' growth areas could be shown as outlined rather than solid colours, which would make the other layers more easily visible.

**Relief sought:** Amend maps in Part 3, Chapter 1 so that the 'planned' and 'potential long-term growth areas' are shown in outline rather than as solid colours, so as to allow the other layers to be more clearly visible.

#### 5.2 Chapter 2 Tāngata whenua

The tāngata whenua chapter sets out aspirations for tāngata whenua, including the challenges that are faced by tāngata whenua in relation to growth and development.

The Ministry would like to note its support for the Combined Tāngata Whenua Forum outcomes including Te Ngākau – that marae communities are connected to social and health services, education and sporting facilities and where practical public transport.



**Relief sought:** Retain as notified.

### 5.3 Climate resilience

The Strategy sets out its approach to ensuring that growth is managed in a way that addresses climate resilience. The approach includes promoting compact mixed used urban development, connected centres and dedicated transport corridors, higher densities, intensification of areas and mode shift towards more sustainable travel. The Ministry supports the intent of the Strategy and the proposed approach. It will be important to ensure that climate change resilience – including climate change mitigation and adaptation – is at the heart of any decision-making in relation to the identification of greenfield growth areas. Dispersed greenfield growth would not assist in achieving the climate resilience outcomes of the draft Strategy.

**Relief sought:**

- Amend Map 5 so that the 'planned' and 'potential long-term growth areas' are shown in outline rather than as solid colours, to allow the areas at risk from climate change to be clearly visible.
- Retain the growth directives as notified.

### 5.4 Te Taiao – Our Environment

The Ministry is supportive of the approach outlined in the Te Taiao/Our Environment chapter which emphasises the importance of growth within environmental limits, the maintenance or restoration of a full range of ecosystems, and the development of an interconnected network of open spaces, reserves and ecological corridors.

**Relief sought:**

- Amend Map 6 so that the 'planned' and 'potential long-term growth areas' are shown in outline rather than as solid colours, to allow the areas at risk from climate change to be clearly visible.
- Retain the growth directives as notified.

### 5.5 Urban Form and Centres

The Ministry supports the connected centres scenario with compact urban communities planned and supported through local structure plans, placemaking and urban design to achieve good quality social, cultural, economic and environmental outcomes.

It is noted that the potential long-term areas shown on Map 12 are those identified in UFTI but not yet investigated, consulted on, and confirmed. This seems at odds with Map 18 which shows one of these potential long-term areas (the Eastern Centre) as being a confirmed long-term growth area. This is further discussed in section 6 of this submission.

**Relief sought:**

- Retain the growth directives as notified.
- Retain Map 12 as notified.

### 5.6 Transport

The Ministry is supportive of the approach outlined in the transport chapter which would support access to local social and economic opportunities within a 15-minute walk or bike ride, and sub-regional social and economic opportunities within 30-45 minutes. A programme to create high frequency public transport routes and an integrated and connected strategic walking and cycling network is supported. It will be important to ensure that provision is made for public transport,

walking and cycling early in the development of greenfield growth areas in order to ensure that new residents are able to access these transport modes.

**Relief sought:**

- Retain as notified.

## 5.7 Social Infrastructure and Well-Being

The Ministry is supportive of the focus within the draft Strategy on the importance of social infrastructure in supporting well-being. The Ministry supports the Strategy's focus on a network approach to the provision of social infrastructure. This acknowledges that each network of facilities functions as a whole, to provide a balance between locality, accessibility and economies of scale. The network is generally characterised by two different levels of provision; 'sub-regional/citywide' and 'local'.

As set out in the draft Strategy, in some cases, existing schools in the Western Bay of Plenty sub-region are at or nearing capacity. This is a result of rapid population growth in specific areas and the complexity of delivering additional educational infrastructure due to funding, planning, land or other constraints. The Ministry seeks to work proactively with the Smart Growth partners to understand the timing, staging, location, type and quantum of growth to ensure the Ministry can respond.

Map 17 "Existing and Proposed Sub-Regional Social Infrastructure" shows various categories of schools including kura, primary (including composite and contributing), secondary, and other school types (intermediate, teen, special schools). The scale of the map makes it difficult to determine whether all schools in the sub-region have been included, and the categories used to group different types of schools mean that some schools could be in more than one category. It would be simpler at this scale to group schools together. It is also important to note that the map only shows existing schools, despite the map title which suggests it may include proposed schools as well. Future schools will be planned in line with growth but are not mapped.

**Relief sought:**

- Amend Map 17 to clarify that the schools shown on the map are existing schools.
- Amend Map 17 to retain kura as one category but re-named as 'existing kura' and group the other school categories together and re-name as 'existing schools'.
- Retain the rest of the chapter as notified.

## 6. Part 4 – Future Development Strategy

The National Policy Statement on Urban Development (2020, amended May 2022) (NPS-UD) sets out the requirement for each Tier 1 council (including Tauranga City Council, Western Bay of Plenty District Council and Bay of Plenty Regional Council) to have a Future Development Strategy. This sets out how the councils intend to achieve well-functioning urban environments, provide at least sufficient development capacity for urban growth for the next 30 years to meet expected demand and to assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.

To meet the expected demand in the Western Bay of Plenty sub-region, including a required margin above demand to meet the NPS-UD requirements, between 37,000 and 43,000 new homes are needed over the next 30 years. A housing insufficiency has been estimated of up to 1,400 dwellings in the short-term, 2,780 in the medium term, and 3,000 in the long-term – a total of up to 7,180 dwellings over the 30 years if the additional competitiveness margin required by the NPS-UD is included. This increases to a shortfall of up to

7,930 dwellings under proposals by Tauranga City Council to reduce its capital expenditure programme in a number of areas, including the reduction in expenditure to support new urban growth areas.

In order to address the shortfall, the draft Strategy outlines the need to rely on bringing forward land in the east and west and achieve a greater level of intensification. The draft Strategy also notes that the Eastern Centre may be required earlier and at a greater scale if development capacity is not provided as anticipated in other identified areas. Maps 1-12, 15-17 and 19 show the Eastern Centre, Te Puna and the wider Tauranga Western Corridor as 'potential long-term growth areas'. However, on Map 18 – Future Development Strategy Staging Map – the Eastern Centre is identified as a confirmed long-term growth area. As a result, there is some confusion as to what the preferred 30-year growth pattern is for the sub-region. The draft Strategy needs to be clearer about the status of the Eastern Centre, particularly if the Tauranga Western Corridor SDP is confirmed.

**Relief sought:**

- Clarify the timing and status of the Eastern Centre.
- Clarify whether both the full Tauranga Western Corridor SDP area (including the potential growth areas) and the Eastern Centre would be needed within the 30-year timeframe if the TWC SDP is confirmed.
- Staging or relative priority of growth in the corridors would be helpful, and this should form part of the Implementation and Funding Plan.
- Amend Map 19 to show the correct location of the Keenan Road growth cell.

**7. Part 5 – Implementing the Strategy**

It is noted that the Implementation and Funding Plan for the FDS (and the wider Strategy) will be developed in accordance with the NPS-UD requirements. The Ministry acknowledges the strong partnership and collaborative approach to growth planning that has been undertaken by Smart Growth over the last 20 plus years and looks forward to working with the Smart Growth partnership in the development of the Implementation and Funding Plan. The Ministry also looks forward to being involved in more detailed planning for priority growth areas such as through local spatial and structure planning.

**The Ministry does not wish to be heard in support of its submission.**

Nāku noa, nā



*Blair Firmston*

**Manager – Spatial Planning**

**Land Investment and Planning - Te Pou Hanganga, Matihiko | Infrastructure & Digital**



*Jayne Taylor-Clarke*

**Acting Director Land Investment and Planning - Te Pou Hanganga, Matihiko | Infrastructure & Digital**

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[education.govt.nz](https://education.govt.nz) [temahau.govt.nz](https://temahau.govt.nz)

## Tangata Whenua Collective (CTWF workshop)

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**From:** [REDACTED] >  
**Sent:** Thursday, 19 October 2023 2:33 pm  
**To:** Have Your Say  
**Cc:** Te Pio Kawe  
**Subject:** Collective feedback on the draft SmartGrowth Strategy from tāngata whenua sessions

Kia ora koutou

Please find below collective feedback from the recently-held tāngata whenua sessions about the draft SmartGrowth Strategy.

**About the tāngata whenua sessions**

At the Combined Tāngata Whenua Forum meeting of 27 September, members requested an additional opportunity to informally discuss the draft Strategy. This is to enable the preparation of informed and effective submissions.

For this reason, I organised and facilitated three online sessions to (1) de-mystify the draft strategy (2) discuss what the draft content means for attendees and (3) how to provide feedback. It would build upon the information prepared in the most recent Tū Pakari e-pānui:

<https://www.smartgrowthbop.org.nz/categories/e-panui>

The sessions were held:

- Wednesday 11 October (evening)
- Friday 13 October (morning)
- Tuesday 17 October (afternoon)

In total 10 participants joined the sessions, comprising a mix of representatives from CTWF, hapū, iwi and Māori land trusts.

**How were attendees feeling?**

Some attendees were comfortable with the general direction of the draft Strategy. Others had not had time to navigate the 180 page document. Many attendees were incredibly frustrated with the lack of capacity and time to provide feedback (*"Putting a submission through by 20th October is a huge and shitty process and I am not sure where to start"*).

On a personal note - it is important to note that our hapū and Iwi reps across the sub-region are overwhelmed, particularly with overlapping local and central government consultation processes, together with limited time and resourcing to participate effectively. If you do not receive much feedback on the draft Strategy from tāngata whenua, it could be more of an indication of lack of capacity rather than a lack of interest or concern.

**What was the feedback?**Feedback about sub-regional growth

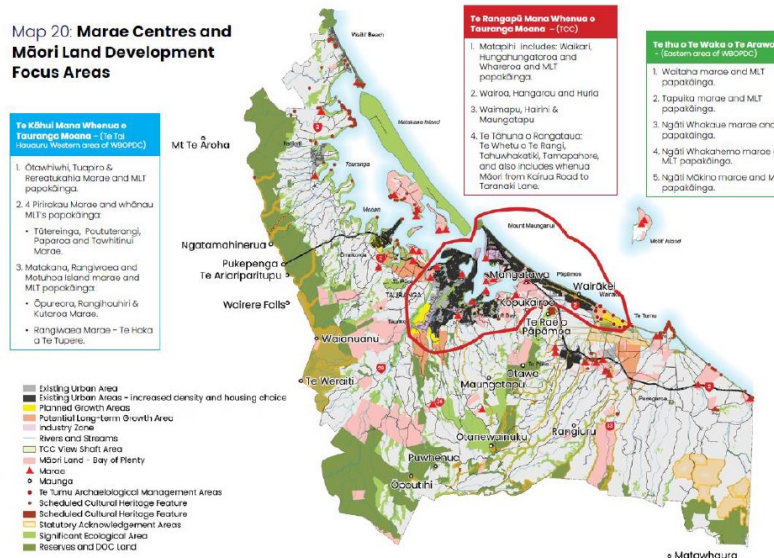
- How can we manage growth and provide houses for others, when we can't currently and adequately provide homes for our own? Where's the manaakitanga and kotahitanga?
- Māori are already overrepresented in the worst statistics relating to employment, income, housing and homelessness.
- Increasing the supply of housing/rentals is good but needs to cater for the range of needs, especially lower income.

sub 60

- The SmartGrowth Strategy needs to ensure that Māori are not left further behind.
- We need to ensure that manuhiri are not prioritised over mana whenua.
- We need affordable rentals and homes in urban areas as well as the ability to build on our whenua.
- Our current population requires priority over future population.
- Is there sufficient capacity within the natural environment to handle more people? Is there sufficient water supply for a growing population? We need to ensure that our waterways and aquifers are kept healthy and not stressed by overabstraction.
- Need to ensure a whole systems approach, from maunga ki te moana.

### Feedback about the draft Strategy

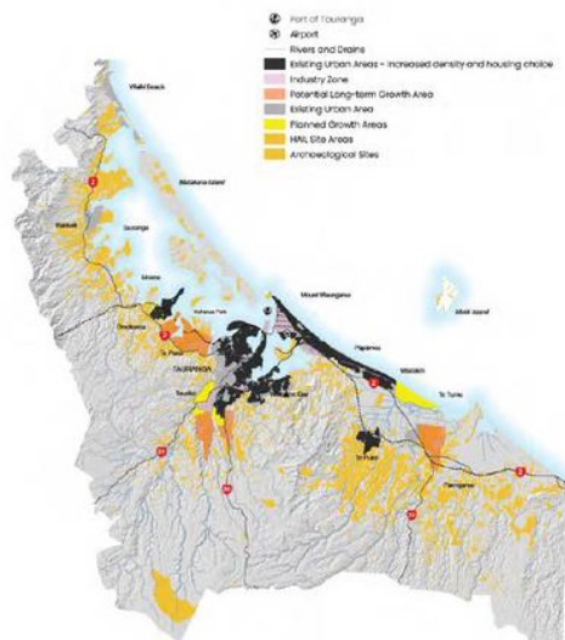
- The consultation process on the draft Strategy was too short.
- Strategy implementation is critical and needs to be resourced well.
- Support reference to CTWF outcomes and proposed Marae Centres and Māori Land Development Focus. SmartGrowth needs to ensure that this is adequately funded so that it is as successful and results in tangible outcomes for our people. Need to build capacity and capability within tāngata whenua to ensure success is long-lasting. Matapihi would benefit from tāngata whenua-led spatial planning.



- Resource consent processes need to be streamlined. We want to be able to respond quickly to the growing needs of our whanau, especially those who can't afford to rent/buy and to enable those who want to move home.
- In relation to Māori land development:
  - Infrastructure is just as huge a cost as paying for a house.
  - Hopefully someone can fight for us and win a "no rates to pay on Māori Land and "slice down the water rates cost for Māori land dwellers.
  - Have a Maori bank for whanau wanting or needing to build a comfortable home on their land with reasonable price infrastructure .
- Don't forget the role of whakatauaki within the strategy. They are a reflection of our values based on our tupuna. For example:
  - Whatungarongaro te tangata, toitū te whenua - As man disappears from sight, the land remains.
  - Te oranga o te tangata, he whenua./he taiao – The health of the people is drawn from the land/environment.
  - He aha te mea nui te ao? He tangata he tangata, he tangata! What truly matters in life - it is the people, the people, the people!
- Map 2c - there is discomfort that archaeological sites and HAIL sites are on the same map. There is no need for them to be displayed together. Suggest separating.

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Map 2c:

**'Go Carefully' – Hazardous Activities and Industries List and Archaeological Sites**

Although I am a member of the Strategy Working Group, I am more than happy to speak to the matters outlined in this email at the December hearings.

Nga mihi

[REDACTED]

SmartGrowth Tu Pakari - Kai Arahi (Technical Advisor)

[REDACTED]

## CPAG WBOP submission : SmartGrowth Strategy 2023-2073

### Child Poverty Action Group CPAG

Our Vision is an Aotearoa where all children flourish free from poverty

Founded in 1994, the Child Poverty Action Group is an independent, registered charity working to eliminate child poverty in Aotearoa New Zealand through research, education and advocacy. This submission is from the local Western Bay of Plenty network of CPAG.

CPAG has identified the need for every child to have a warm, safe and dry house and we recognise the significant inequities for tamariki Māori. We have studied the SmartGrowth Strategy 2023-2073 with a focus on these issues. While we agree that sound planning is important, we are seeking a bolder approach if we are to provide families with affordable sustainable homes and to correct the inequitable distribution of power and resources that prevents Māori in particular from flourishing.

Chapter 7 - Housing in the Smartgrowth Strategy 2023-2073 has summarised some of the challenges in the housing sector but has not identified solutions. It has been well documented over time that housing problems in the WBOP are very serious and have proven very difficult to solve, both for the short term and long term.

**Social Housing:** CPAG has suggested that nationally we need to increase the number of State Owned Units from 3.2% to 4% by 2030 and 5% by 2040. The Strategy describes the current Social Housing base in WBOP as less than 2% and blames challenging economics in WBOP as the reason. Clearly this is not good enough. We need an urgent debate to find ways to fix this.

**Affordable Rental Housing:** WBOP has both expensive rentals and a shortage of suitable rental homes. *"The ongoing failure to deliver affordable private rentals makes a strong case to focus new spending on longer term solutions such as social housing, incentives to build new affordable housing, and shared equity rental, rather than short term rent subsidies"* : CPAG Greg Waite.

**Configuration of current housing (an example):** Research conducted by Katikati Housing Network has revealed that there are 444 widows living in family homes with over 60% wishing to downsize but feeling "trapped" because there are no suitable alternatives to move to. Additionally, as a result, 90% report financial stress. These family homes would make ideal homes for today's young families unable to find suitable homes for sale or rent. What is required is a business model for developers that allows them to adapt to building to actual market need.

We have recently heard that development plans will see properties in Te Puke being purchased for the purposes of intensification and the introduction of more one and two-bed dwellings and social housing. That said, we must remember that housing for larger families can also form part of intensification strategies. It is not only important for the accommodation of children, but also multi-generational households. Those in poverty should not be marginalised to the sidelines, we must ensure they are integrated with society and are supported responsibly. This creates truly diverse communities.



Reversely, many elders who are financially viable hesitate to downsize. An assessment of the occupancy within existing housing stock should be interrogated, prior to the approval of further urban sprawl. The UK trialled a 'bedroom tax' to encourage elderly homeowners to downsize or consider alternative uses for their spare rooms. While this wasn't received well by many homeowners, it did force homeowners to consider their options sooner. If backed up with support or buy-out services, a version of the policies mentioned could be used to help optimise existing housing stock here in Aotearoa New Zealand.

**Connected Centres and UFTI:** The current model has focused development into existing urban areas. We see rural areas remain relatively isolated due to lack of access to public transport and struggling without services such as affordable high speed internet connections. The WBOP has a significant rural population who are often disadvantaged.

**Greenfield urban developments;** The Strategy relies on Greenfield urban developments to provide 64% of the new housing supply. We believe that repeating the current subdivision model such as we see today at Omokoroa and Papamoa East is not an option. The price of purchasing and developing land is simply not affordable and financially favours developers. The housing choices currently available are largely limited to larger expensive family homes that today's families can not afford. Where are the shared ownership homes? Smaller units and shared co-housing options etc do not feature. Restrictive contracts and covenants seem to stipulate minimum sizes ~~too~~ larger than many require and require complex rooflines and shapes and garages and do not allow factory produced homes etc, this all leads to expensive construction that is not affordable for many.

**Existing Housing Stock;** There are significant urban areas where the housing stock is on larger sections with structures not easily adapted to provide suitable warm dry homes. Some bold vision is required to for large scale urban renewal.

**A Way forward ?** We are looking for a long term vision and plan to provide a new way forward, the Strategy is not enough. More intensive urban developments are a way forward but must be affordable. Good planning is required to provide quality low cost intensive housing that still provide privacy and useable outdoor spaces and shared facilities. We may need to look overseas for examples, such as [Rightsizing Scheme - Cork City Council](#). Such developments should be within the existing urban footprint. If well done we believe quality intensive developments in existing urban areas would be preferred over long commutes to expensive traditional homes on tiny sections. SmartGrowth could provide a lead here. Opportunities exist to work with Tangata Whenua to find specific solutions. In the UK almost 1/3 of new homes are built by Housing Associations which then provide Social Housing, shared ownership plans, supported and specialist housing, market homes to rent and market homes to buy. We need to come up with a plan that works with and for people.

**Further Refs:**

CPAG: Policy Brief on Social Housing June 2023 by Alan Johnson

CPAG: The Contribution of rental affordability to child poverty in Aotearoa  
August 2023 by Greg Waite



## Envirohub Bay of Plenty

### Submission on SmartGrowth Strategy 2023 – 2073

18 October 2023

Envirohub thanks the SmartGrowth partners and welcomes the opportunity to comment on the proposed SmartGrowth Strategy.

Envirohub appreciates, the emphasis in the Strategy on sustainable development in line with the Local Government Act, effective and ongoing partnerships with Tangata Whenua in order to achieve the cultural values of the whenua, moana and awa and the commitment to Te Taiao - Our Environment as a core objective of the Strategy.

We note the paragraph on page 9, Our sub-region;

‘As our sub-region continues to grow and change, we have to find our place within the natural and cultural environment. This means recognising natural limits such as natural hazards and other constraints and the need to protect and enhance the natural environment.....’

#### **The Pillars:**

The long term value of Smartgrowth relies on the success of the four pillars. This particularly applies to the pillars of ‘Partnership’ and ‘Collaborative Leadership’.

Partnerships have significantly developed since the inception of SmartGrowth. . In relation to cultural partnerships, growing respect, understanding and appreciation of a different indigenous worldview has slowly evolved. This has benefited all of us.

However, the Collaborative Leadership pillar, especially in respect of Councils, needs **ongoing** championing, nurturing and advocacy from Governance, CE’s and senior staff to ensure the long-term effectiveness of the Strategy. If this is compromised then the Strategy will be ‘just another document’ and all the investment in it will be wasted.

In respect of the Integration pillar, more explanation would assist so that it is clear what is intended. Envirohub has assumed that many of the objectives of the Smartgrowth Strategy will be implemented through Councils’ existing proposed action plans and funding commitments. What is not obvious, at this point, is how that intention can be visibly demonstrated so that the public can assess whether the Smartgrowth objectives are being achieved. The proposed Implementation Plan would be a good place to include such linkages. It should demonstrate that integrated thinking is ongoing, not just within each sector of the Strategy but across the sectors as well.

#### **Vision Objectives and Transformational Shifts**

case study. It does not mention the environment, yet the concept of environmental enhancement and green corridors for climate change and biodiversity were a key part of discussions for this plan. The transformational shift in thinking and action must place green infrastructure in the same scoping space as built infrastructure. Ecosystems are not an add-on, they are fundamental.

To that end, Envirohub notes that in the Integration grey boxes 'Integrate and enhance local ecosystems and biodiversity' has been omitted as it largely has from the growth directives in Chapters 05 to 08 and Chapters 10 and 11.

**We request** that an appropriate environmental growth directive be added to each chapter and the Integration statement on local ecosystems be included in each grey box.

**Further thinking:**

**Climate Change;** The issues relating to Climate Change are referred to throughout the document. They receive strong focus in Chapter 03 of the Spatial Plan. We note in particular the introductory paragraphs of the Chapter.

However despite these words the 'ecosystems and biodiversity' principle is not noted in many of the Spatial Plan Chapters. This needs to be remedied.

As well there is scant mention of any Mitigation approaches which could, if funded and implemented save Councils millions of dollars in Adaptation projects over the 50 year period.

**Representation on the Smartgrowth Leadership Group;** Envirohub has noted and supports the inclusion of Priority One, representing the economy, on the SLG. It is equally necessary that the Environment sector and the Social sector also have a seat at the table. A key requirement would be that such representatives have good networks and ongoing connections with their relevant sectors. We ask that that both sectors be included and that this be considered and supported by SLG.

Envirohub appreciates the opportunity to comment on the proposed SmartGrowth Strategy and thanks all staff who have contributed to its development.

Envirohub would like to **speak to its submission**.



Mary Dillon, Envirohub Chair



**SmartGrowth Strategy 2023–2073 (Consultation Draft)****Submitter**

Landsdale Development Limited ("Landsdale")

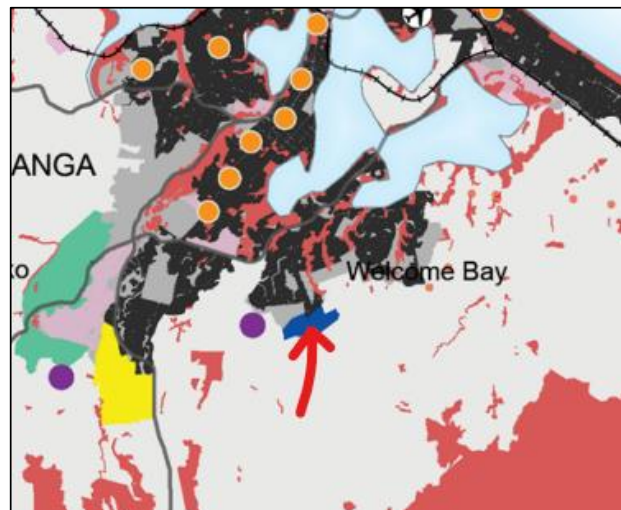
**Submission Summary**

Landsdale supports the Consultation Draft of the SmartGrowth Strategy 2023-2073.

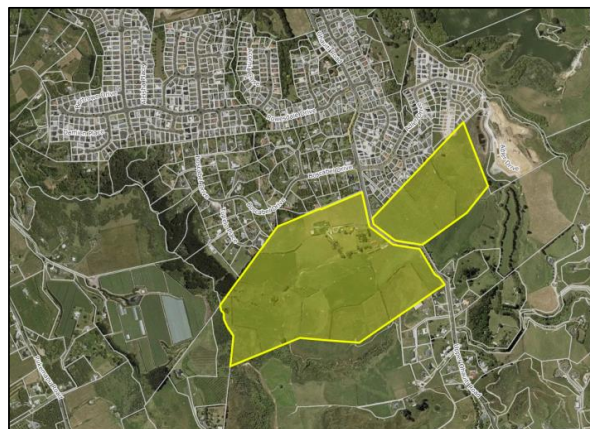
In particular, Landsdale supports the inclusion of the land identified as "Ohauiti South" as part of the Future Development Strategy *(the extract to the right is from Map 18, Future Development Strategy – Staging Map)*.

The Ohauiti South land is shown in Map 18 with blue shading. We have added the red arrow just to indicate the land that is the subject of this submission.

Landsdale is the proponent of a private plan change for the subject land. The plan change has been several years in the making and has recently (August 2023) been lodged with Tauranga City Council, accompanied by a very thorough evidence base of technical assessments.

**Location**

The land is located at 120 and 125 Upper Ohauiti Road, immediately south of (adjacent to) the existing urban area. It is a logical extension to the urban area. The site is 56.4 hectares in area and located on both sides of Upper Ohauiti Road. It is currently zoned Rural and Greenbelt.



**Welcome Bay and Ohauiti Planning Study 2020**

Approximately three years ago, Tauranga City Council prepared the *Welcome Bay and Ohauiti Planning Study 2020* to better understand the infrastructure needs, options and costs to accommodate additional housing growth within the Welcome Bay and Ohauiti area. The Study identified seven areas that were assessed in terms of infrastructure modelling and assessments for three waters services (water supply, wastewater and stormwater), transport infrastructure, community and education facilities, and commercial centre development.

Following modelling and assessments, the study:

*'identified that while there are some capacity issues, there are no fatal flaws to delivering many of the upgrades that would support additional housing capacity. However, the Study ultimately found that accommodating the medium and high growth housing scenarios in the Study Area would be unfeasible, except in the Upper Ohauiti urban growth area (Upper Ohauiti)'.*

We note that the area called "Upper Ohauiti" in the *Welcome Bay and Ohauiti Planning Study 2020* is the same as the area now called "Ohauiti South" in the draft SmartGrowth Strategy/Future Development Strategy.

A recommendation of the *Welcome Bay and Ohauiti Planning Study 2020* was:

- (b) *Subject to positive outcomes of discussions with relevant landowners and preliminary structure planning investigations, approve completion of a structure plan and rezoning of the Upper Ohauiti growth area that is within the current Tauranga City boundary through the Tauranga City Plan Review project;*

Also, the BOPRC Regional Policy Statement prior to Proposed Change 6, had identified the site within the urban limits post 2021, and for development to commence from 2026.

**Current Private Plan Change**

In late 2021, following discussions with Tauranga City, Landsdale engaged a project team of specialists in a wide range of areas and began a comprehensive programme of investigations, assessments, modelling and preparation of documentation for a private plan change to urbanise this site.

This has been a collaborative process with Tauranga City Council. The private plan change application was initially lodged with TCC in April 2022. It has recently (August 2023) been resubmitted to incorporate the results of additional investigations and design work undertaken.

The private plan change includes comprehensive specialist assessments of effects to determine the suitability and extent of urbanisation of the site. This includes geotechnical, servicing, extensive stormwater, ecological, cultural impact, archaeological, soil contamination, landscape and visual, urban design and economic assessments and hapu consultation. This has been undertaken under the relevant regulatory requirements. The plan change is accompanied by a detailed Outline Development Plan (Plan and Schedule of Requirements). This includes the design of roading for future public transport, within the site, linkages to adjacent undeveloped sites and upgrades of the existing roads adjacent to the site, including multi-modal transport, a network of reserves to vest with Council and protection of historic reserves.

**SmartGrowth Strategy**

The Strategy sets out that the sub-region *'faces significant challenges with opening up new land for housing (greenfields). This is largely due to natural constraints, infrastructure servicing and*

*funding challenges*' (pg 111). With one of the key housing system challenges being the limited new land supply for housing coming to market in the short to medium term.

The Future Development Strategy (FDS) within the SmartGrowth Strategy identifies the site as **Ohauti South** (Western Corridor), with potential for:

- 190 (Dwellings Medium Term 2027-2034); and
- 280 (Dwellings Long Term 2034-2054)

The site provides land and infrastructure to contribute positively to the identified housing shortfall. (addresses Challenge 1, taking into account other challenges). The site has not been identified on the Hazard 'No-Go' (Map 2) or the 'Areas at Risk from Climate Change' (Map 5).

The FDS identifies *Critical Enabling Infrastructure* for the sub-region and the respective corridors. In the case of the site this includes public transport services and infrastructure enhanced services (Medium term) and the Waiari Water Supply Scheme, Stages 2 and 3 (Medium term). Appendix 1 sets out *Infrastructure to Support Development*, for the Western Corridor relevant projects include Roothing, SH29A corridor upgrade 2024-2027), Wastewater, Ila Place WW upgrades (2024-2027) and Education, possible new primary provision in Ohauti (2034-2054).

There is a existing, known capacity issue along SH29A as such any funding and acceleration of the upgrade of this corridor is beneficial to the wider area.

### Conclusion

Landsdale seeks that the inclusion of Ohauti South in the FDS as a Medium Term Growth Area be retained.

The private plan change is actively being progressed, and the developer is committed to delivering much-needed housing (with associated cycling, walking, public transport-capable roading infrastructure, reserves and other services infrastructure) at the earliest opportunity. The current "medium term" timing will enable rezoning, earthworks and subdivision consent processes between 2024 and 2026, with the delivery of the first houses from 2027.

### Address for Service

*Landsdale Developments Limited, c/- Harrison Grierson  
Attention: Andrew Collins / Anna Gardiner*

[REDACTED]

sub 64



Name of submitter: Classic Group

This is a submission on the SmartGrowth Strategy 2023-2073 and Future Development Strategy

**Submitter Details:**

Electronic address for service of submitter: [REDACTED]

Postal address: [REDACTED]

Contact person: Peter Cooney, Director

Date: 19 October 2023

Classic Group welcomes the opportunity to provide feedback on the SmartGrowth Strategy 2023-2073

Background: The Classic Group of companies includes Classic Builders and Classic Developments, amongst other interestes. Classic Builders is the second largest residential home builder in New Zealand. Classic Developments is our development company which undertakes a variety of commercial and residential developments throughout New Zealand. In terms of residential development, we undertake a combination of greenfields, brownfields redevelopment, medium density and retirement villages. Though now nation-wide, our companies have started, and have our head offices in Tauranga.

Classic Group advocates for increased involvement of developers in the SmartGrowth Strategy and Future Development Strategy. Active engagement of developers is crucial for successfully realising the shared vision for our subregion's growth.

Acknowledgment of the Region's Challenges:

It is widely recognised within the developer community that the Western Bay Subdistrict faces serious challenges concerning growth forecasts and development capacity. Developers, including Classic Group, have been cognizant of these challenges for an extended period. We understand the complexity of these issues and are keen to collaborate on finding pragmatic solutions.

Skepticism Regarding Infill Development Forecasts:

Upon reviewing the provided growth forecasts, there is a notable level of skepticism, particularly concerning the projected spike in infill development. The basis upon which these forecasts are made remains unclear, raising concerns about the accuracy and feasibility of the anticipated surge in infill development. We are very skeptical that this will occur which will only make the predicted shortfall worse.





Critical Role of Developers in Implementation:

We cannot stress enough the vital role that private developers, including ourselves, play in successfully implementing any development strategy. Regardless of their meticulousness, plans remain static without active participation from the private sector. In the context of the SmartGrowth Strategy and Future Development Strategy, developers must be actively engaged throughout the planning and implementation phases. Here are three compelling reasons why developer involvement is paramount:

**Expertise and Experience:** Developers, especially those with a significant track record like Classic Group, bring invaluable expertise and experience to the table. Understanding the intricacies of land development, market dynamics, and infrastructure requirements, developers can offer practical insights that are essential for formulating realistic and achievable strategies.

**Market Responsiveness:** Developers operate at the forefront of market demands. Their involvement ensures that the strategies devised are not only visionary but also responsive to the immediate and evolving needs of the community. This market-driven approach is crucial for creating sustainable, market-oriented developments that align with the region's growth trajectory.

**Fostering Public-Private Partnerships:** Collaboration between the public and private sectors is fundamental for achieving comprehensive and sustainable development. Developers can act as strategic partners, contributing resources, expertise, and funding to complement public initiatives. Such partnerships can amplify the impact of SmartGrowth initiatives and ensure their long-term viability.

Focus on Priority Development Areas (PDAs): Developers, particularly within Priority Development Areas, are instrumental in unlocking the potential of these strategic zones. Their active participation in PDAs increases the likelihood that development occurs at the required pace and scale, aligning with the overarching goals of SmartGrowth.

We emphasise the need for sustained collaboration between SmartGrowth and private developers, especially within Priority Development Areas. We are prepared to contribute our expertise, resources, and insights to ensure the success of these strategies.

We wish to be heard in support of our submission



sub 64



Peter Cooney  
Director  
Classic Group







20 October 2023

## **Submission to Smart Growth Strategy 2023**

We submit as follows:-

### **1. Te Puke region**

Te Puke is defined as the geographic region from the Papamoa Hills to Otamarakau.

Te Puke is the Kiwifruit Capital of the world with 6000ha of orchards and sophisticated post harvest facilities. Dairy farming, beef and sheep farming, forestry, wood processing, manufacturing and service industries round out a strong economy. Growth projections are positive.

The Te Puke region has well established and connected communities, all with their own identity, social infrastructure and a history of economic and social progress. Schools, community halls, sports & recreation facilities and industry are the norm. Centrally located, it has close proximity and easy connection to the Bay of Plenty's 3 cities. The Te Puke region is at the heart of the Eastern Corridor.

Te Puke has significant economic drivers and has developed extraordinary capability to grow and prosper. Through changing economic cycles it has built resilience and an enviable reputation for progress and outstanding achievements across multi disciplines on the world stage.

With a population of 20000 approx. and GDP in excess of \$2b, our contribution to the national economic effort is both important and impressive. Te Puke will continue to grow.

### **2. Our view of Smart Growth**

Smart Growth should encourage economic and social continuity **and** good planning for sustainable growth. Not more and more people that will negatively impact lifestyle and wellbeing. Not growth that is at odds with sustainability. Not growth for growths sake. Rather, growth that is beneficial for all of the communities of the Western Bay of Plenty sub region.

It is critical that all of our communities have voice and local knowledge is listened to. For many years, a Strategic Partners Forum was successful. It afforded selected interest groups the opportunity to share local aspirations and knowledge, needs based assessments and well thought out ideas. The termination of the Forum was very disappointing and has resulted in a disconnection to industry sectors, communities and local knowledge.

We are fully aware that Smart Growth is a planning framework only and approval and implementation processes for growth initiatives sit with the territorial authorities and central government. In our view, the Smart Growth strategy must be connected to communities and interest groups and their local knowledge. We urge you to re establish the strategic partners forum and to listen to an abundance of local knowledge and ideas that will be invaluable in making sure we achieve the positive S's - Strategic, Sustainable, Serviced, Successful and Satisfied.

### **3. Economic growth**

Te Puke will continue to grow. Our key economic driver is the Kiwifruit Industry. Growth of 200ha p.a. of new plantings means increasing export earnings, new jobs and wealth creation. Additionally, the Rangioru Business Park will create more jobs and added value.

[tpedg.co.nz](http://tpedg.co.nz)

With such strong economic drivers, new housing & industrial and commercial zones will need to be planned and delivered in close proximity to our economic activity. The Te Puke region must be categorised as high priority.

We encourage Smart Growth to listen to and work with Business and Industry groups that bring knowledge and direct connection to economic sectors and local communities. Smart Growth management has detailed projections for both industry and population growth. We also remind you of our previous submissions in 11/2016, 11/2018, 12/2019, 02/2020, 02/2021 and numerous tours of the Te Puke region for Smart Growth leaders and staff on which we highlighted future needs and introduced them to real people with considerable local knowledge.

#### 4. Housing

We support the plan to explore and potentially develop in the longer term a new 15000+ settlement east of the Te Puke township.

**Concurrent** with this initiative it is important that we stimulate immediate residential growth in the Te Puke township, Paengaroa and Pongakawa. An assessment of Maori land suitable for housing solutions in Maketu and an extension of coastal settlements past Pukehina further east should also be explored.

These settlements are well established and are central to our economic drivers. It is not a case of one or the other (new 15000+ settlement or growth of existing settlements). We need housing now to match economic growth. We need to progress both initiatives.

Central government support is important for success. Timing is everything and with a change of Government the time is **now**. The incoming Government are very clear on 3 points:-

- a. The MDRS or Sausage flat law designed to prevent urban sprawl will be gone in 100 days. They have a preference for greater focus on greenfield developments which will allow conversion of farmland to new residential settlements.
- b. Repealing three waters reform and a return to local management is positive.
- c. RMA reform will remove red tape and hindrance to progress.

Additionally, decentralisation will encourage localism and a 'can do' attitude. Distant bureaucrats with no local knowledge making decisions from afar does little for sensible progress.

This is a terrific opportunity for Smart Growth to impress upon central government the need for access to infrastructure funding. Smart Growth must **endorse** a program for the Te Puke region to deliver new housing in the township and in the rural settlements we have identified. With green lights instead of red and clearly defined pathways for swift progress, land owners and housing developers will act quickly. It should also be noted that this can be a sensible and balanced program of rural land conversion in sync with economic growth.

#### 5. Industrial land and zones

Smart Growth has identified shortages in industrial land and the need for new industrial zones. The Rangiuru Business Park is an important part of the solution particularly for larger scale industry.

At the same time, it is important that new industrial land is made available in the vicinity of the Te Puke township. The township has a wealth of small to medium industrial businesses and is a strategic location for more growth. Case in point - the existing 'West' industrial zone. Willing land owners, a willing developer and a business investor wanting to make this happen. Unfortunately, the consenting process is slow and frustrating. This is a perfect example of how Smart Growth can make a positive difference by endorsing a sensible growth initiative that will deliver economic benefits. A 'make it happen' attitude, a sunrise frame of mind as opposed to a sunset mentality and a sense of urgency will be warmly welcomed.

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Enabling swift consenting for the 'West' Industrial Zone will inspire investors & developers and will lead to the identification of other suitable land for development.

We acknowledge that climate change is real and risks must be mitigated. Waterways, flood prone areas and roading challenges highlight the need for fit for purpose infrastructure. Overcoming challenges and finding solutions is what Te Puke does best.

### Demographics

We encourage Smart Growth to be mindful of:-

- An ageing population
- The incredible opportunities that will emerge with the growth of the Māori population
- Growth in immigration

Specific planning and swift delivery of housing, transport and accessibility solutions for these demographics must be elevated to high priority.

### General

Over the last decade we had regular engagement with Smart Growth decision makers. We developed strong relationships and we learned a great deal through the strategic partners forum. We have had mixed success in making progress on issues and needs that we identified, but at a minimum we did have engagement and on occasion support to get important things done.

More recently, engagement has been terminated. There has been a noticeable shift toward city needs and a prioritisation to Tauranga and it's near west. This is how we see it. Our perception is our reality.

Smart Growth is incredibly important. Smart Growth as a body with an overarching approach to enabling progress across all of our subregional communities can be powerful.

Our submission is focused on infrastructure delivery and improved processes to enable new housing and industrial land availability for the Te Puke region. What we seek is achievable. It is not complicated. Smart Growth endorsement and support will help make it happen.

In closing we draw your attention to the make up of the Te Puke region. Well established, connected and successful communities, all with strong identity and a history of success.



We would appreciate the opportunity to speak to our submission.

Sincerely,

Mark Boyle



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## FEEDBACK ON CONSULTATION DRAFT SMARTGROWTH STRATEGY 2023-2073 (SGS)

sub 66

To Bay of Plenty Regional Council

Name of submitter: Golden Bay, a division of Fletcher Concrete & Infrastructure Ltd (GB)

- 1 This feedback relates to the SGS, and in particular the lack of recognition in that document that existing industrial activities in terms of the contention the SGS. In particular the submission is concerned with ensuring the following matters are recognised and provided for:
  - i. The positive role of existing industrial activities in the regional and local economy
  - ii. The functional need for many industrial activities to be located at the Port of Tauranga
  - iii. the appropriateness of encouraging the effective and efficient use of existing industrial land through continued development and intensification.
  - iv. The role of industrial activities in assisting in the housing supply chain.
  - v. the role of industrial activities in delivering Objective 1, Policies 1(b) and 2 of the National Policy Statement for Urban Development 2020
- 2 GB could not gain an advantage in trade competition through this feedback.
- 3 The specific matters of the SGS that GB's feedback relates to, and the reasons are set out in **Appendix A** and **Appendix B** below.

**Signed** for and on behalf of **Golden Bay Cement, a division of Fletcher Concrete & Infrastructure Ltd** by its Resource Management Consultants and authorised agents Resource Management Group Ltd



Jacquie Hewson  
Senior Consultant  
20 October 2023

Address for service of submitter:

**Golden Bay, a division of Fletcher Concrete & Infrastructure Ltd**

c/- Jacquie Hewson

Resource Management Group

[REDACTED]

Wellington 6140

Email address: [REDACTED]

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**Appendix A**

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**sub 66****INTRODUCTION**

- 1 GB welcomes the opportunity to provide feedback on the SmartGrowth Strategy 2023-2073 (**SGS**) a partnership between Tauranga City Council, the Bay of Plenty Regional Council, the Western Bay of Plenty District Council, Tāngata Whenua and central Government.
- 2 The feedback is broadly organised as follows:
  - **Summary of GB's feedback;**
  - **Statement of Interest and Background; (SGS)**
  - **General feedback;**
  - **Summary of relief sought**
  - **Conclusion**
  - **Detailed relief sought (contained in Appendix B)**

**SUMMARY**

- 3 GB generally supports the **SGS** overall vision and the four well-being objectives for the western Bay of Plenty sub-region growth over the next 30 years.
- 4 GB also supports the acknowledgment that there is shortfall in industrial land, particularly within the Mount Maunganui/Port industrial area, whereby the **SGS** states that *"Growth in the sub-region is such that the housing and business development capacity assessment (HBA) has indicated that there is a shortfall in industrial land. In addition, the SmartGrowth partners have also been working collaboratively on several other projects that relate to industrial land, particularly work relating to the Mount Maunganui/Port industrial area."*<sup>1</sup>
- 5 However, GB's key concern that the **SGS** does not place a strong enough emphasis on protecting and supporting existing industrial activities, particularly within the Port of Tauranga. GB considers that industrial activities, such as those conducted by GB, plays a key role both regionally in terms of the economy and nationally in terms of providing for construction material to assist the housing delivery set out in the National Planning Standards for Urban Development (**NPS-UD**).
- 6 GB seeks amendments to the **SGS**, particularly to ensure that the operational and functional need of industrial activities on industrial land within the Port of Tauranga are supported. Furthermore, GB seeks that industrial activities are recognised for their contribution to both the economy and assisting in housing delivery both at a regional and national level.

**STATEMENT OF INTEREST AND BACKGROUND**

- 7 GB is New Zealand's longest standing cement manufacturer. GB is committed to sustainable products and product transparency which is central to their strategy, vision and values. This includes how they operate, with their New Zealand made cement being independently assessed to demonstrate a 27% lower carbon emissions per tonne of cement than ISC 2020 Baseline.
- 8 The Cement is processed at GB's site at Portland in Whangarei and distributed to various Service Centres by coastal cement tanker. This is currently the most efficient and effective way of transferring bulk materials around New Zealand.
- 9 GB has multiple service centre located throughout New Zealand, with its Mount Maunganui Service Centre site being located at Tasman Quay at the Port of Tauranga.

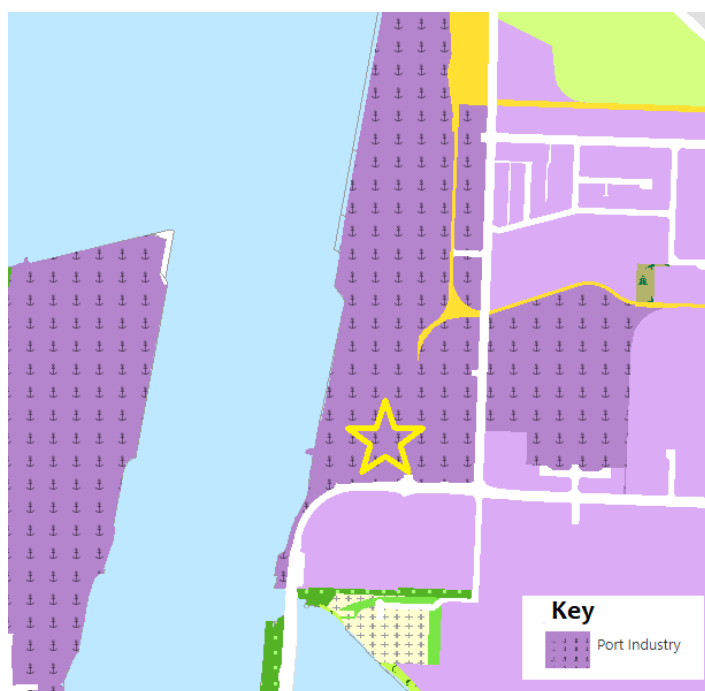
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<sup>1</sup> SGS 2023-2073 - Page 106

Service centres such as the Mt Maunganui one, are required for the bulk storage and handling of cement prior to sale in bulk to GB's customers.

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- 10 Bulk cement is transported from the Service Centre by means of special purpose road tankers. Bagged cement is distributed throughout the Bay of Plenty and Coromandel region by independent transport contractors.
- 11 GB's Mt Maunganui Service Centre site and the surrounding area is located within the Port Industry Zone in the Operative Tauranga City Plan, as shown below in **Figure 1**, indicated by a yellow star.



**Figure 1:** Operative Tauranga City Planning Maps showing GB's site indicated by a yellow star.  
Source: <https://mapi.tauranga.govt.nz/Html5/index.html?viewer=Mapi>, annotated by RMG October 2023

## GENERAL FEEDBACK

### Key aims of the feedback

- 12 Given the housing crisis in New Zealand, the continued supply of building materials is of utmost relevance and importance to GB. As New Zealand's longest standing cement manufacturer, the continued supply of cement products to the residential building industry is a crucial component of ensuring residential intensification can be delivered.
- 13 The principal aim of this feedback is therefore to ensure the continued operation of the GB Mount Maunganui site and the subsequent continued supply of cement products to support residential intensification by establishing the most appropriate provisions to achieve that goal and assist the Council in implementing relevant direction from higher order statutory instruments – particularly the National Policy Statement on Urban Development 2020.
- 14 Under **Part 3 'The Spatial Plan – Business Employment Land'** of the SGS, it states:  
  
*"The potential for a reduction in existing land combined with strong demand for industrial land to support growth has meant that additional industrial land needs to be identified. Potential locations for future industrial land have been identified in Part 4 of this Strategy."*<sup>2</sup>
- 15 GB supports the recognition that there is strong demand for industrial land and supporting industrial growth.

<sup>2</sup> SGS –Section 3, 'Business Employment Land'– Page 106

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- 16 However, the 'Urban form and centres growth directives' do not recognise the pressure on industrial land and does not seem to support the continued development and potential intensification of existing industrial land to ensure effective and efficient use of existing industrial land.

- 17 The SGS goes on to state that:

*"In addition, the SmartGrowth partners have also been working collaboratively on several other projects that relate to industrial land, particularly work relating to the Mount Maunganui/Port industrial area. These projects collectively seek to respond to a range of significant issues, including natural hazard risk, traffic congestion, port growth, cultural and social impacts, air quality and health concerns. Several of these issues have been identified as putting pressure on existing land uses. This includes pressure on existing industrial land across Tauranga in particular from natural hazards, including flooding and inundation, which may result in the need for retreat or relocation of current activities overtime."*

- 18 The key concern for GB is that whilst the SGS identifies a range of significant issues<sup>3</sup>, which place pressure on existing industrial land across Tauranga, it does not explicitly recognise the important role industrial activities (including those at the Port) play both in an economic growth but also in the ability to assist in housing delivery. In a spatial sense, GB submits that there needs to be greater support and protection for industrial activities where there is an operational need to locate within the Port Industrial area.

- 19 GB seeks amendments to draft SGS to ensure that the overall intention to provide for the continued development and intensification of existing industrial land to protect business and industrial land in the most effective and efficient manner, which will in turn assist in the growth of the regional and national economy and assist in housing supply.

- 20 The specific details of the amendments sought by GB are set out in [Appendix B](#).

#### SPECIFIC FEEDBACK IN RELATION TO THE REGULATORY CONTEXT

##### National Policy Statement on Urban Development

- 21 The National Policy Statement on Urban Development (**NPS UD**) directs that local authority decisions on urban development are to be integrated with infrastructure planning decisions,<sup>4</sup> and that planning decisions contribute to well-functioning urban environments. Policy 1 of the **NPS UD** also seeks that that Council's enable a variety of sites that are suitable for different business sectors in terms of location and site size.<sup>5</sup> Furthermore, Policy 2 of the **NPS UD** directs Council's "provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term."<sup>6</sup>

- 22 As part of the **NPS UD**, Councils are required to prepare a Future Development Strategy, which is contained within the SGS to promote integrated, long-term strategic planning to help the Council set the high-level vision for accommodating urban growth over the long term and identify strategic priorities to inform other development-related decisions. It aims to:

- achieve well-functioning urban environments
- ensure there is sufficient development capacity
- Integrate planning and infrastructure planning and funding

- 23 A well-functioning urban environment is one which will:

<sup>3</sup> including natural hazard risk, traffic congestion, port growth, cultural and social impacts, air quality and health concerns.

<sup>4</sup> Objective 6 **NPS UD**

<sup>5</sup> Policy 1 **NPS UD** (b)

<sup>6</sup> Policy 2 **NPS UD**

*“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”<sup>7</sup>*

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- 23 GB’s operation provides cement products for the building industry to ensure that people and communities can construct residential dwellings now and, in the future, and therefore their continued operation contributes to a well-functioning urban environment and subsequently assists in implementing Objective 1, Policy 1(b) and Policy 2 of the NPS UD.

#### SUMMARY OF RELIEF SOUGHT

- 24 In summary, GB seeks that the SGS strengthens the protection of existing Industrial zoned land in order to give effect to Policy 2 of the NPS UD as it relates to business land. In particular, recognise and make provision in the SGS such that the role of existing industrial land is able to continue to make a contribution to the goal of providing “*at least sufficient development capacity to meet expected demand for housing and for **business land** over the short term, medium term, and long term.*”<sup>8</sup> (**emphasis** added).
- 25 To give effect to this, the specific relief (any such consequential relief) sought by GB is:
- i. **Insert** additional wording in *Part 1: Introduction and Context - Economic Objectives*<sup>9</sup> to recognise and support existing industrial activities to that provide for economic and housing growth as set out in **Appendix B**.
  - ii. **Amend** wording in *Part 1: Introduction and Context – Sub-Regional Context- Marine Corridor*<sup>10</sup> to recognise industrial activities also require shipping links to and from the Port.
  - iii. **Amend** wording in *Part 2: The Growth Challenge – Opportunities*<sup>11</sup> to recognise that industrial activities are an economic opportunity for the region as set out in **Appendix B**.
  - iv. **Amend** wording in *Part 3: The Spatial Plan – Chapter 06. Urban Form and Centres*<sup>12</sup> introduction to recognise that “construction materials” be included as a key industry to the nationally significant Port of Tauranga as set out in **Appendix B**.
  - v. **Insert** additional wording in *Part 3: The Spatial Plan – Chapter 07. Housing – Housing system growth directives*<sup>13</sup> that supports existing local industries that provide for construction materials that assist in housing delivery as set out in **Appendix B**.

#### CONCLUSION

29. For reasons set out in this feedback above, GB considers that amendments to SGS wording to strengthen the overall intention to protect existing Industrial zoned land to ensure that the SGS contributes to a well-functioning urban environment and subsequently assists in implementing Objective 1 of the NPS UD.

<sup>7</sup> Objective 1 NPS UD

<sup>8</sup> NPS UD Policy 3

<sup>9</sup> SGS, Page 17

<sup>10</sup> SGS, Page 27

<sup>11</sup> SGS, Page 40

<sup>12</sup> SGS, Page 102

<sup>13</sup> SGS, Page 114




## APPENDIX B

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## Draft Smartgrowth Strategy 2023-2073– Detailed Relief

Feedback Name: **Golden Bay, a division of Fletcher Concrete & Infrastructure Ltd**

SGS Section	Specific section/Page	Position	Reason for Feedback	Relief sought
<b>Part 1:</b> Introduction and Context -	Economic Objective – Page 17	Neutral	GB considers that additional wording should be inserted to recognise and support existing industrial activities that provide for economic and housing growth and both a regional and national scale.	<p><b>Insert</b> a new economic objective:</p>  Enable and support the continued establishment , operation and maintenance of existing industrial activities that contribution to the regional and national economy.
<b>Part 1:</b> Introduction and Context	Sub-Regional Context- Marine Corridor – Page 27	Neutral	GB considers that additional wording should be inserted to recognise that industrial activities also require shipping links to and from the Port of Tauranga.	<p><b>Amend</b> the following ‘Marine corridor’ as follows:</p> <ul style="list-style-type: none"> <li>Shipping links to and from the Port of Tauranga for freight, <u>industry</u> and tourism</li> <li>Aquaculture</li> <li>Recreation</li> </ul>
<b>Part 2:</b> The Growth Challenge	Opportunities – Page 40	Neutral	GB considers that additional wording should be inserted to recognise that industrial activities are an economic opportunity for the region.	<p><b>Amend</b> the penultimate bullet point on page 40 as follows:</p> <ul style="list-style-type: none"> <li>Building on the sub-region’s economic advantages – the Port of Tauranga, horticulture, food production, <u>industrial activities</u> and technology.</li> </ul>
<b>Part 3:</b> The Spatial Plan	Chapter 06. Urban Form and Centres - Introduction – Page 102	Neutral	GB recognise that “construction materials” be included as a key industry to the nationally significant Port of Tauranga.	<p><b>Amend</b> second paragraph on page 102 as follows:</p> <p>The connected centres programme also outlines business growth within the sub-region, supporting growth in appropriate areas and enabling reliable movement to and from key industries such as horticulture and <u>construction materials</u> to the nationally significant Port of Tauranga. Currently there is adequate land supply to accommodate business (commercial and industrial) growth in the short term. However, as our sub-region continues to grow, we will need to plan and cater for future demand that supports the connected centres programme.</p>
<b>Part 3:</b> The Spatial Plan – Chapter 07. Housing	Housing system growth directives – Page 114	Neutral	GB considers that support should be provided to existing local industries that have functional/operational need to locate ant the	<p><b>Insert</b> new directives as follows:</p>

SGS Section	Specific section/Page	Position	Reason for Feedback	Relief sought
			Port and which provide for construction materials that assist in housing delivery.	<div>sub 66</div> <ol style="list-style-type: none"> <li>1. Support and realise tāngata whenua aspirations for Māori land and papakāinga development in urban areas and in the rural environment.</li> <li>2. Deliver the place-based housing plan through collaboration and leadership.</li> <li>3. A range of housing types, tenures and price points is provided within all growth areas and Māori land.</li> <li>4. Affordable housing supply is increased and targeted to stressed households (renters – submarket and market; alternative tenures; progressive ownership; iwi).</li> <li>5. Urgently reduce households being housed in unsatisfactory emergency accommodation.</li> <li>6. Public housing supply is increased and aligns the typologies of new and existing housing stock to match the needs of the community.</li> <li>7. Demonstrate mixed tenures and housing typologies through intensification projects.</li> <li>8. Proactively support the delivery of social and affordable housing in existing urban areas and growth areas.</li> <li>9. <u>Proactively supports local industrial activities that have a functional/operational need to locate ant the Port of Tauranga</u></li> <li>10. <u>Proactively support local industrial activities that provide housing construction materials to assist in housing delivery both regionally and nationally.</u></li> </ol>

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20 October 2023

## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Ford Land Holdings Pty Ltd Submission

<b>Introduction</b>	
<b>Submitter:</b> Ford Land Holdings Pty Ltd (FLH)	<b>Contact Person:</b> Jeff Fletcher
<b>Address for Service:</b> C/- PO Box 13428 Tauranga 3141	<b>Email:</b> [REDACTED]
<b>Hearings:</b>	
<b>FLH wish to talk to their submission together with the Tumu Kaituna 14 Trust &amp; Carrus Corporation on either the 4<sup>th</sup> or 5<sup>th</sup> December 2023.</b>	
<p>Ford Land Holdings Pty Ltd (FLH) have 243ha of land in the Papamoa East Te Tumu Growth Management Area and have been actively involved with the SmartGrowth Partners with regard to the urbanisation of Te Tumu for over 20 years since SmartGrowth started in 2000. Te Tumu was identified as a Growth Management Area in the original SmartGrowth Strategy that was published in 2004; since that time Te Tumu was confirmed as a Growth Management Area in the:</p> <ol style="list-style-type: none"> <li>1. Bay of Plenty Regional Policy Statement – 2007.</li> <li>2. Tauranga City Plan as a Future Urban Zone – 2009.</li> <li>3. SmartGrowth Strategy 2013.</li> <li>4. Urban Form and Transport Initiative 2020.</li> <li>5. Numerous publications linked to or associated with the above publications.</li> </ol> <p>Over the last 20+ years substantive amounts of research, investigation and planning have been carried out for the urbanisation of Te Tumu by Tauranga City Council (TCC) with the support of the SmartGrowth Partnership. This work has confirmed that Te Tumu can be urbanised and provide much needed housing and employment land for the Bay of Plenty.</p> <p>In late 2022 TCC advised that they were working towards notification of a Plan Change for Te Tumu in 2024.</p> <p>In the context of the above background FLH were very surprised and disappointed that the Te Tumu Development Timeframe in the Future Development Strategy (FDS) has been pushed out to the Long Term 2034-2054 period.</p> <p><b>Key Submission Points</b></p> <ol style="list-style-type: none"> <li>A. FLH requests that the Te Tumu Development Timeframe in the FDS is moved to the Medium Term 2027-2034 period, noting that a Plan Change for Te Tumu is proposed to be notified in 2024.</li> <li>B. FLH requests that the Infrastructure for Te Tumu as detailed in the FDS and in the submissions below is moved to the Medium Term 2027-2034 period.</li> <li>C. FLH requests that a full Project Plan and Resourcing Plan be prepared for the FDS; and Informed by the Project Plan and Resourcing Plan, that a SmartGrowth / FDS Implementation Office be established with adequate funding and resources to deliver the FDS.</li> <li>D. FLH requests that the Kaituna Link transport connection from the eastern end of Te Tumu to Rangiora is included in the FDS and Map 18 as noted below.</li> </ol>	

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20 October 2023

## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Ford Land Holdings Pty Ltd Submission

SmartGrowth Strategy Context and Linkages	
Through the extensive research, investigation and planning carried out on Te Tumu the proposed urbanisation of Te Tumu addresses and satisfies the key objectives and outcomes identified and sought in the SmartGrowth Strategy, these include:	
SmartGrowth Strategy Reference / Section	Item / Area
Part 1: Introduction and Context	Vision, Objectives and Transformational Shifts
Well-Beings Objectives, p17	
	1. <u>Environmental:</u> Through the extensive environmental and natural hazards investigations carried out the draft Structure Plan for the Te Tumu Growth Management Area recognises and positively addresses the environmental objectives.
	2. <u>Cultural:</u> The proposed Plan Change for Te Tumu will enable the TK14 Trust to recognise and realise the cultural and historical connections to the whenua of the TK14 hapu as well as the wider tāngata whenua connections to the whenua.
	3. <u>Social:</u> The draft Structure Plan for the Te Tumu Growth Management Area will enable a range of housing types and tenures to be realised. FLH are proposing to have a range of housing typologies to enable multi-generational housing opportunities.
	4. <u>Economic:</u> The draft Structure Plan for the Te Tumu Growth Management Area identifies 57ha of Employment Land on the Tumu Kaituna 14 (TK14) land and is located directly east of The Sands Sub-Regional Town Centre and the connection to the Tauranga Eastern Link via the proposed Papamoa East Interchange which is due for completion in 2026-2027. Through the TCC – Waka Kotahi Single Stage Business Case for Te Tumu which is currently being finalised the proposed transport corridors will deliver a range of travel choices via dedicated walking / cycling paths and dedicated public transport lanes.

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20 October 2023

## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Ford Land Holdings Pty Ltd Submission

SmartGrowth Strategy Reference / Section	Item / Area
<b>Part 1: Introduction and Context</b>	<b>Vision, Objectives and Transformational Shifts</b>
Transformational Shifts, p18-21	
	<p>01. <u>Homes for Everyone.</u> The draft Structure Plan for the Te Tumu Growth Management Area will enable a range of housing types and tenures to be realised. FLH are proposing to have a range of housing typologies to enable multi-generational housing opportunities.</p>
	<p>02. <u>Marae as Centres and Opportunities for Whenua Māori.</u> Through the 2022 TK14 Owner Engagement Hui we understand there is an aspiration for a Marae on TK14.</p>
	<p>03. <u>Emissions Reduction through Connected Centres.</u> The draft Structure Plan for the Te Tumu Growth Management Area identifies higher density areas within the three main land blocks to achieve and enable a wider range of quality housing typologies to be achieved, which in turn will allow more affordable housing options that will support the proposed multi-modal transport system which included dedicated public transport lanes on the northern transport corridor,</p>
	<p>04. <u>Strong economic corridors linking the East and West to the City and the Port.</u> The proximity of Te Tumu to The Sands Sub-Regional Town Centre, Rangiuru Business Park and Tauranga Eastern Link supports the economic corridors.</p>
	<p>05. <u>Restore and enhance eco-systems for future generations.</u> The Te Tumu Growth Management Area has an area of 744ha of which 342ha or 46% has been identified in the draft Structure Plan as being protected due to a range of identified environmental and natural hazard factors. These areas will be protected and enhanced through the urbanisation of Te Tumu.</p>
	<p>06. <u>Radical change to the delivery, funding and financing model for growth.</u> The scale of the Te Tumu Growth Management Area and opportunity it provides for much needed housing of approximately 6,100 dwellings together with 57ha of Employment land together with its proximity to The Sands Sub-Regional Town Centre, Rangiuru Business Park and Tauranga Eastern Link; provides the opportunity to work with Government on a specific funding and financing model for Te Tumu.</p>

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20 October 2023

## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Ford Land Holdings Pty Ltd Submission

SmartGrowth Strategy Reference / Section	Item / Area
<b>Part 2: The Growth Challenge   Challenges and Opportunities</b>	
Challenges and Opportunities	<p><u>Challenge 1   Housing and transport choice in the sub-region</u> Based on the most recent structure planning, conservatively the Te Tumu Growth Management Area can provide 6,100 residential dwellings together with 57ha of Employment land. FLH can provide approximately 3,000 dwellings. The scale of the housing opportunity at Te Tumu will also allow for and enable a range of housing typologies to be provided to cater for a wide range of housing needs.</p>
	<p><u>Challenge 2   Enabling Tangata Whenua to realise values and aspirations.</u> The TK14 Trust went through an owner engagement process in 2022 at which Trustee Guiding Principles were discussed and adopted, for more information go to <a href="https://www.tumukaituna14.org.nz/video-minutes-owners-engagement-hui-5/">https://www.tumukaituna14.org.nz/video-minutes-owners-engagement-hui-5/</a></p>
	<p><u>Challenge 3   Accessible community facilities and infrastructure levels of service aligned with community expectations and needs.</u> Based on the most recent structure planning, the Te Tumu Growth Management Area will have a 20ha Active Reserve, located on TK14 land, together with extensive reserves, walking and cycling opportunities. The FLH block will include a large neighbourhood centre called Ford Town which will include a range of amenities and facilities to service the area. The close proximity to The Sands Sub-Regional Town Centre will provide access to community facilities, community services as well as extensive retail and employment opportunities.</p>
	<p><u>Challenge 4   Responding to climate change.</u> Extensive natural hazards research and investigation has been carried out for Te Tumu Growth Management Area. These investigations have included Sea Level Rise and determined that the risks to urban development within the Te Tumu Urban Growth Management Area are low under the Bay of Plenty Regional Council Regional Policy Statement (RPS) or can be designed to be mitigated to a low level of risk.</p>

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## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Ford Land Holdings Pty Ltd Submission

SmartGrowth Strategy Reference / Section	Item / Area
<b>Part 2: The Growth Challenge   Challenges and Opportunities</b>	
	<p><u>Challenge 5   Safe and efficient movement of people and goods.</u></p> <p>The structure planning for Te Tumu includes two collector / arterial routes, one of which will provide for dedicated public transport lanes to enable regular and efficient public transport connections to both The Sands Sub-Regional Town Centre, where there will be a transport hub, as well as to the wider region through the Papamoa East Interchange and Tauranga Eastern Link.</p> <p>57ha of proposed Employment Zoned land on TK14 combined with the close proximity to The Sands Sub-Regional Town Centre and the Rangiuru Business Park will reduce commuting trips from / to Te Tumu.</p>
	<p><u>Challenge 6   Managing pressure from development on the natural environment, including from more intensive horticultural and agricultural uses.</u></p> <p>The structure planning for Te Tumu included extensive investigations and research on ecology, biodiversity, natural character, landscape, and stormwater for the Te Tumu Urban Growth Management Area. The outcomes of these investigations, combined with the areas impacted by natural hazards, is that approximately 46% of the Te Tumu Urban Growth Management is protected and retained as natural areas to provide for environmental protection and amenity for the balance of the land proposed to be urbanised.</p>
	<p><u>Challenge 7   Insufficient funding and financing to deliver on the Strategy.</u></p> <p>As with all urban growth infrastructure funding and financing is a significant challenge to progressing the development of the Te Tumu Urban Growth Management Area.</p> <p>Notwithstanding the infrastructure funding and financing challenge, the scale of Te Tumu and the positive long-term outcomes detailed above, make Te Tumu and viable urban development proposition, that provides regional benefits. This in turn provides a sound basis for long term government, and institutional investment in Te Tumu.</p>

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## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Ford Land Holdings Pty Ltd Submission

SmartGrowth Strategy Reference / Section	Item / Area
<b>Part 3: The Spatial Plan</b>	
	<p><u>General:</u></p> <p>The structure planning combined with the extensive investigations, research and reporting for the Te Tumu Urban Growth Management Area addresses the SmartGrowth spatial approach as detailed below.</p>
	<p><u>Chapter 01: Areas to be Protected and Developed Carefully</u></p> <p>As detailed above, the Te Tumu Urban Growth Management Area:</p> <ul style="list-style-type: none"> <li>a) Isn't in a 'No-Go' Area – refer Map 1.</li> <li>b) Has 'Go- Carefully' layers which have been investigated and addressed / accommodated in the structure planning for Te Tumu – refer Map 2.</li> <li>c) Has 'Go- Carefully'- Flooding areas which have been investigated and addressed / accommodated in the structure planning for Te Tumu – refer Map 2a.</li> <li>d) Doesn't contain Highly Productive Land / Soils – refer Map 2b.</li> <li>e) Isn't a 'Go- Carefully'- Hazardous Activities and Industries List area – refer Map 2c.</li> <li>f) Has identified Archaeological Sites which have been included in the in the structure planning for Te Tumu – refer Map 2c.</li> <li>g) Isn't a 'Go- Carefully'- Land Elevation area – refer Map 2d.</li> <li>h) Isn't a 'Go- Carefully'- Land Instability area – refer Map 2e.</li> <li>i) Has 'Go- Carefully'- Liquefaction and Peat Soils areas which have been investigated and addressed / accommodated in the structure planning for Te Tumu – refer Map 2f.</li> </ul>
	<p><u>Chapter 02: Tāngata Whenua</u></p> <p>The structure planning for the Te Tumu Urban Growth Management Area has identified cultural and archaeological sites of significance and had a number of Cultural Impact assessments completed by Iwi/hapu.</p> <p>The TK14 Trust went through an owner engagement process in 2022 at which Trustee Guiding Principles were discussed and adopted, for more information go to <a href="https://www.tumukaituna14.org.nz/video-minutes-owners-engagement-hui-5/">https://www.tumukaituna14.org.nz/video-minutes-owners-engagement-hui-5/</a></p>



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## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Ford Land Holdings Pty Ltd Submission

SmartGrowth Strategy Reference / Section	Item / Area
<b>Part 3: The Spatial Plan</b>	
	<u>Chapter 03: Climate Resilience</u> The structure planning combined with the extensive investigations, research and reporting for the Te Tumu Urban Growth Management Area addresses the Climate Resilient Development Principles detailed on p67 and addresses the Sea Level Rise anticipated under RCP 8.5 (2090) – refer Figure 16. See also <i>Challenge 4 – Responding to Climate Change</i> above.
	<u>Chapter 04: Te Taiao – Our Environment</u> The structure planning for the Te Tumu Urban Growth Management Area provides for the three Te Taiao – Our Environment Growth Directives as detailed on p85. See also <i>Challenge 6 – Managing pressure from development on the natural environment, including from more intensive horticultural and agricultural uses</i> above.
	<u>Chapter 05: Rural</u> The land at Te Tumu is low quality rural land for Rural production activities
	<u>Chapter 06: Urban Form and Centres</u> The Te Tumu Urban Growth Management Area is clearly identified in UFTI, the Urban form and centres growth directives (p107), and on Map 12 (p109).
	<u>Chapter 07: Housing</u> As detailed above in <i>Challenge 1 - Housing and transport choice in the sub-region</i> ; the Te Tumu Urban Growth Management Area will conservatively provide 6,100 residential dwellings with 3,000 (approx) of these being on the FLH land. The scale of the housing opportunity at Te Tumu will allow for and enable a range of housing typologies to be provided to cater for a wide range of housing needs.
	<u>Chapter 08: Transport</u> As detailed above in <i>Challenge 5 / Safe and efficient movement of people and goods</i> ; the structure planning for the Te Tumu Urban Growth Management Area includes two collector / arterial routes, one of which will provide for dedicated public transport lanes to enable regular and efficient public transport connections to both The Sands Sub-Regional Town Centre, where there will be a transport hub, as well as to the wider region through the Papamoa East Interchange and Tauranga Eastern Link. The Transport directives (p118) are also being addressed through the Waka Kotahi / TCC Single Stage Business Case (SSBC) for Te Tumu which is well advanced.

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## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Ford Land Holdings Pty Ltd Submission

SmartGrowth Strategy Reference / Section	Item / Area
<b>Part 3: The Spatial Plan</b>	
	<p><u>Chapter 09: Three Waters and Other Infrastructure</u></p> <p>The three waters infrastructure planning for Te Tumu is well advanced and provided for as follows:</p> <ul style="list-style-type: none"> <li>a) <u>Wastewater</u>: Rising mains and pump stations have been planned to connect Te Tumu to the Te Maunga Wastewater Treatment Plant.</li> <li>b) <u>Water</u>: Reservoirs and mains have been planned to connect Te Tumu to the new Waiari Water Treatment Plant.</li> <li>c) <u>Stormwater</u>: The Papamoa Comprehensive Stormwater Consent (RC63636) provides for the urbanisation of Te Tumu including a high-level overflow discharge to the Kaituna River from the Wairakei Stream.</li> </ul>
	<p><u>Chapter 10: Social Infrastructure and Well-Being</u></p> <p>As detailed above in <i>Challenge 3 / Accessible community facilities and infrastructure levels of service aligned with community expectations and needs</i>; the structure planning for the Te Tumu Urban Growth Management Area includes a 20ha Active Reserve and a large neighbourhood centre called Ford Town which will include a range of amenities and facilities to service the area.</p> <p>The close proximity to The Sands Sub-Regional Town Centre will provide access to community facilities, community services as well as extensive retail and employment opportunities.</p>
	<p><u>Chapter 11: Social Infrastructure and Well-Being</u></p> <p>The structure planning for the Te Tumu Urban Growth Management Area provides the Economic development growth directives as detailed on p138.</p>

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## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Ford Land Holdings Pty Ltd Submission

<b>Future Development Strategy (FDS) Submission</b>	
<b>Future Development Strategy Reference / Section</b>	<b>Item / Area / Submission</b>
<b>Connected Centres Development Strategy   p 145 - 146</b>	
	As noted above, through the extensive research, investigation and planning carried out on Te Tumu the proposed urbanisation of Te Tumu addresses and satisfies the key objectives and outcomes identified and sought in the SmartGrowth Strategy – see above; accordingly FLH requests that this section of the FDS contain a statement that SmartGrowth and TCC will commit to work with FLH and the Te Tumu Landowners to progress a Plan Change for the Te Tumu Urban Growth Management Area so it can be notified before the end of 2024.
<b>Residential Growth Allocations for the Next 30 Years   p 146 - 147</b>	
	FLH requests that the Table on page 147 be amended as follows: <ul style="list-style-type: none"> <li>a) Te Tumu Dwellings Medium Term (2027-2034); 2,100.</li> <li>b) Te Tumu Dwellings Long Term (2034-2054); 4,000.</li> <li>c) Te Tumu Totals 2024-54; 6,100. This reflects to Te Tumu Structure Planning that has been carried out</li> </ul>
<b>Residential Growth Allocations Beyond 30 Years   p 148</b>	
	FLH requests that the Table on page 148 be amended as follows: <ul style="list-style-type: none"> <li>a) Te Tumu Dwelling Opportunity Post 2054; 2,000.</li> </ul> This is based on the opportunity over time for increased residential densities to be achieved.
<b>Business Employment Land   p 148</b>	
	FLH requests that the Table on page 148 be amended as follows: <ul style="list-style-type: none"> <li>a) Te Tumu (Employment Land) Medium Term (2027-2034); 60ha.</li> <li>b) Te Tumu (Employment Land) Medium Term (2034-2054); 0ha.</li> </ul>
<b>Development Infrastructure – Eastern Corridor   p 150 - 151</b>	
	FLH requests that the Table on page 151 be amended as follows: <p><u>Add:</u></p> <ul style="list-style-type: none"> <li>a) Public transport infrastructure and associated transport corridors for Te Tumu as identified in the Waka Kotahi Single Stage Business Case; <i>Medium Term, Subject to Business Case.</i></li> <li>b) Kaituna Link transport connection from the eastern end of Te Tumu to Rangioru; <i>Long Term.</i></li> <li>c) Te Tumu WWPS to Wairakei WWPS and Opal Drive WWPS including associated Rising Main Connections to Te Maunga WWTP; <i>Medium Term, Subject to WSE Funding.</i></li> <li>d) Establishment of a new co-educational secondary school; <i>Medium Term, Subject to Bus Case.</i></li> <li>e) Establishment of a new primary school; <i>Medium Term, Subject to Business Case.</i></li> </ul> <p><u>Amend:</u></p> <ul style="list-style-type: none"> <li>a) Te Tumu Trunk Mains to read <i>Te Tumu Water Trunk Mains.</i></li> </ul>

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## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Ford Land Holdings Pty Ltd Submission

Future Development Strategy Reference / Section	Item / Area / Submission
<b>Future Development Strategy   p 154 - 155</b>	
	<p>FLH requests that:</p> <ul style="list-style-type: none"> <li>a) Map 18 on page 154 be amended to show Te Tumu moved to <i>Medium Term (2027-2034)</i>.</li> <li>b) Map 18 on page 154 be amended to show the Kaituna Link transport connection from the eastern end of Te Tumu to Rangiora as shown on Map 6 of the 2013 SmartGrowth Strategy.</li> <li>c) Map 19 on page 155 be amended to show Te Tumu with a <i>Potential 6,100+ dwellings</i>.</li> </ul>
<b>Implementing the Strategy   p 157 - 162</b>	
	<p>The implementation of the FDS is vital to:</p> <ul style="list-style-type: none"> <li>1. Ensure that there is a multi-agency coordinated plan to deliver the FDS outcomes within the nominated timelines.</li> <li>2. Provide certainty for public and private sector investment.</li> <li>3. Monitor and measure the FDS.</li> <li>4. Enable long term labour, materials and natural resources planning and investment to deliver the infrastructure and built form outcomes sought in the FDS.</li> </ul> <p>The Implementation Strategy requires significantly more work in the form of a Project Plan and Resourcing Plan that will provide the basis for the SmartGrowth Partnership to provide adequate funding and resources to deliver the FDS.</p> <p>FLH requests that:</p> <ul style="list-style-type: none"> <li>a) A full Project Plan and Resourcing Plan be prepared for the FDS; and</li> <li>b) Informed by the Project Plan and Resourcing Plan, that a SmartGrowth / FDS Implementation Office be established with adequate funding and resources to deliver the FDS.</li> </ul>
<b>Appendices   Appendix 1   Sub-Region Wide p 154 - 155</b>	
	<p>FLH requests that:</p> <ul style="list-style-type: none"> <li>a) The Public Transport Item has a new item; <i>PT connections Tauranga to Papamoa East Medium Term (2027-2034)</i>.</li> <li>b) The Community Facilities / Social Infrastructure Item has a new item; <i>Active Reserve at Papamoa East – Te Tumu Medium Term (2027-2034)</i>.</li> </ul>

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## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Ford Land Holdings Pty Ltd Submission

Future Development Strategy Reference / Section	Item / Area / Submission
Appendices   Appendix 1   Eastern Corridor p 154 - 155	
	<p>FLH requests that:</p> <ul style="list-style-type: none"> <li>a) The Public Transport Item has a new item; <i>PT connections Tauranga to Papamoa East Medium Term (2027-2034).</i></li> <li>b) The Public Transport Item has a new item; <i>Te Tumu Collector Roads in the 2027-2034 period.</i></li> <li>c) The Road Network Item has a new item; <i>Te Tumu Collector Roads in the 2027-2034 period.</i></li> <li>d) The Road Network Item has a new item; <i>Te Tumu Structure Plan Projects in the 2027-2034 period.</i></li> <li>e) The Road Network Item has a new item; <i>Kaituna Link Transport Project in the 2034-2054 period.</i></li> <li>f) The Wastewater Item has a new item; <i>Te Tumu Structure Plan Projects in the 2027-2034 period.</i></li> <li>g) The Water Supply Item has a new item; <i>Te Tumu Structure Plan Projects in the 2027-2034 period.</i></li> <li>h) The Stormwater Item has the item; a new item; <i>Te Tumu Structure Plan Projects in the 2027-2034 period.</i></li> <li>i) The Stormwater Item has the item; <i>Wairakei to Kaituna Overflow – Phase 2 moved to 2027-2034.</i></li> <li>j) The Community Facilities / Social Infrastructure Item has a new item; <i>Active Reserve at Papamoa East – Te Tumu Medium Term (2027-2034).</i></li> <li>k) The Education Item has a new item; <i>New co-educational secondary school and Kura at Papamoa East – Te Tumu Medium Term (2027-2034).</i></li> <li>l) The Education Item has a new item; <i>New primary school and Kura at Papamoa East – Te Tumu Medium Term (2027-2034).</i></li> </ul>

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## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Tumu Kaituna 14 Trust Submission

<b>Introduction</b>	
<b>Submitter:</b> Tumu Kaituna 14 Trust (TK14)	<b>Contact Person:</b> Jeff Fletcher
<b>Address for Service:</b> C/- PO Box 13428 Tauranga 3141	<b>Email:</b> [REDACTED]
<b>Hearings:</b>	
<b>TK14 wish to talk to their submission together with Ford Land Holdings &amp; Carrus Corporation on either the 4<sup>th</sup> or 5<sup>th</sup> December 2023.</b>	
<p>The Tumu Kaituna 14 Trust (TK14) have 240ha of land in the Papamoa East Te Tumu Growth Management Area and have been actively involved with the SmartGrowth Partners with regard to the urbanisation of Te Tumu for over 20 years since SmartGrowth started in 2000. Te Tumu was identified as a Growth Management Area in the original SmartGrowth Strategy that was published in 2004; since that time Te Tumu was confirmed as a Growth Management Area in the:</p> <ol style="list-style-type: none"> <li>1. Bay of Plenty Regional Policy Statement – 2007.</li> <li>2. Tauranga City Plan as a Future Urban Zone – 2009.</li> <li>3. SmartGrowth Strategy 2013.</li> <li>4. Urban Form and Transport Initiative 2020.</li> <li>5. Numerous publications linked to or associated with the above publications.</li> </ol> <p>Over the last 20+ years substantive amounts of research, investigation and planning have been carried out for the urbanisation of Te Tumu by Tauranga City Council (TCC) with the support of the SmartGrowth Partnership. This work has confirmed that Te Tumu can be urbanised and provide much needed housing and employment land for the Bay of Plenty.</p> <p>More recently an extensive consultation process was undertaken by the TK14 Trustees in 2022 with the TK14 Owners, with one of the key outcomes being that a resolution was adopted for representatives of the TK14 Trust to negotiate with TCC on suitable mechanisms to provide infrastructure through the TK14 Block which would support the urban development of the entire Te Tumu urban growth area.</p> <p>The majority of Trust owners who engaged in the 2022 engagement process, supported these negotiations proceeding. The negotiations are substantially advanced.</p> <p>In the context of the above background TK14 were very surprised and disappointed that the Te Tumu Development Timeframe in the Future Development Strategy (FDS) has been pushed out to the Long Term 2034-2054 period.</p>	
<b>Key Submission Points</b>	
<ol style="list-style-type: none"> <li>A. TK14 requests that the Te Tumu Development Timeframe in the FDS is moved to the Medium Term 2027-2034 period noting that a Plan Change for Te Tumu is proposed to be notified in 2024.</li> <li>B. TK14 requests that the Infrastructure for Te Tumu as detailed in the FDS and in the submissions below is moved to the Medium Term 2027-2034 period.</li> <li>C. TK14 requests that a full Project Plan and Resourcing Plan be prepared for the FDS; and Informed by the Project Plan and Resourcing Plan, that a SmartGrowth / FDS Implementation Office be established with adequate funding and resources to deliver the FDS.</li> </ol>	

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## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Tumu Kaituna 14 Trust Submission

SmartGrowth Strategy Context and Linkages	
Through the extensive research, investigation and planning carried out on Te Tumu the proposed urbanisation of Te Tumu addresses and satisfies the key objectives and outcomes identified and sought in the SmartGrowth Strategy, these include:	
SmartGrowth Strategy Reference / Section	Item / Area
Part 1: Introduction and Context	Vision, Objectives and Transformational Shifts
Well-Beings Objectives, p17	
	1. <u>Environmental:</u> Through the extensive environmental and natural hazards investigations carried out the draft Structure Plan for the Te Tumu Growth Management Area recognises and positively addresses the environmental objectives.
	2. <u>Cultural:</u> The proposed Plan Change for Te Tumu will enable the TK14 Trust to recognise and realise the cultural and historical connections to the whenua of the TK14 hapu as well as the wider tāngata whenua connections to the whenua. This in turn will allow TK14 owners express their values and aspirations for their whenua.
	3. <u>Social:</u> The draft Structure Plan for the Te Tumu Growth Management Area will enable a range of housing types and tenures to be realised. The TK14 Trust will be retaining ownership of their whenua enabling secure long term affordable housing opportunities to be established and be delivered, for TK14 owners and the open market, by the Trust through community housing trusts and partnerships with Government agencies such as Kainga Ora.
	4. <u>Economic:</u> The draft Structure Plan for the Te Tumu Growth Management Area identifies 57ha of Employment Land on the TK14 whenua and is located directly east of The Sands Sub-Regional Town Centre and the connection to the Tauranga Eastern Link via the proposed Papamoa East Interchange which is due for completion in 2026-2027. Through the TCC – Waka Kotahi Single Stage Business Case for Te Tumu which is currently being finalised the proposed transport corridors will deliver a range of travel choices via dedicated walking / cycling paths and dedicated public transport lanes.

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## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Tumu Kaituna 14 Trust Submission

SmartGrowth Strategy Reference / Section	Item / Area
Part 1: Introduction and Context	Vision, Objectives and Transformational Shifts
Transformational Shifts, p18-21	
	<p>01. <u>Homes for Everyone.</u> The draft Structure Plan for the Te Tumu Growth Management Area will enable a range of housing types and tenures to be realised. The TK14 Trust will be retaining ownership of their whenua enabling secure long term affordable housing opportunities to be established and be delivered, for TK14 owners and the open market, by the Trust through community housing trusts and partnerships with Government agencies such as Kainga Ora.</p>
	<p>02. <u>Marae as Centres and Opportunities for Whenua Māori.</u> Through the 2022 TK14 Owner Engagement Hui; a clear aspiration for a Marae on the whenua was established. The TK14 Trustees will work with the owners to achieve this aspiration.</p>
	<p>03. <u>Emissions Reduction through Connected Centres.</u> The draft Structure Plan for the Te Tumu Growth Management Area identifies higher density areas within the three main land blocks to achieve and enable a wider range of quality housing typologies to be achieved, which in turn will allow more affordable housing options that will support the proposed multi-modal transport system which included dedicated public transport lanes on the northern transport corridor,</p>
	<p>04. <u>Strong economic corridors linking the East and West to the City and the Port.</u> The proximity of Te Tumu to The Sands Sub-Regional Town Centre, Rangiuru Business Park and Tauranga Eastern Link supports the economic corridors.</p>
	<p>05. <u>Restore and enhance eco-systems for future generations.</u> The Te Tumu Growth Management Area has an area of 744ha of which 342ha or 46% has been identified in the draft Structure Plan as being protected due to a range of identified environmental and natural hazard factors. These areas will be protected and enhanced through the urbanisation of Te Tumu.</p>
	<p>06. <u>Radical change to the delivery, funding and financing model for growth.</u> The scale of the Te Tumu Growth Management Area and opportunity it provides for much needed housing of approximately 6,100 dwellings together with 57ha of Employment land together with its proximity to The Sands Sub-Regional Town Centre, Rangiuru Business Park and Tauranga Eastern Link; provides the opportunity to work with Government on a specific funding and financing model for Te Tumu.</p>



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## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Tumu Kaituna 14 Trust Submission

SmartGrowth Strategy Reference / Section	Item / Area
<b>Part 2: The Growth Challenge   Challenges and Opportunities</b>	
Challenges and Opportunities	<p><u>Challenge 1   Housing and transport choice in the sub-region</u> Based on the most recent structure planning, conservatively the Te Tumu Growth Management Area can provide 6,100 residential dwellings together with 57ha of Employment land. TK14 can provide approximately 1,500 dwellings for both its owners and the wider market, many of these dwelling will be affordable dwellings as the land will be leasehold. The scale of the housing opportunity at Te Tumu will also allow for and enable a range of housing typologies to be provided to cater for a wide range of housing needs.</p>
	<p><u>Challenge 2   Enabling Tangata Whenua to realise values and aspirations.</u> The urbanisation of the Te Tumu Growth Management Area will enable the owners' relationship with their whenua to be recognised and realised for themselves and for their future generations. The TK14 Trust Vision can be viewed at <a href="https://www.tumukaituna14.org.nz/our-vision/">https://www.tumukaituna14.org.nz/our-vision/</a> The TK14 Trust also went through an owner engagement process in 2022 at which Trustee Guiding Principles were discussed and adopted, for more information go to <a href="https://www.tumukaituna14.org.nz/video-minutes-owners-engagement-hui-5/">https://www.tumukaituna14.org.nz/video-minutes-owners-engagement-hui-5/</a></p>
	<p><u>Challenge 3   Accessible community facilities and infrastructure levels of service aligned with community expectations and needs.</u> Based on the most recent structure planning, the Te Tumu Growth Management Area will have a 20ha Active Reserve, located on TK14 land, together with extensive reserves, walking and cycling opportunities as well as an education precinct. The TK14 block planning includes a cultural centre and adjoining local centre as well as an owner's campground, and Kura. The close proximity to The Sands Sub-Regional Town Centre will provide access to community facilities, community services as well as extensive retail and employment opportunities.</p>
	<p><u>Challenge 4   Responding to climate change.</u> Extensive natural hazards research and investigation has been carried out for Te Tumu Growth Management Area. These investigations have included Sea Level Rise and determined that the risks to urban development within the Te Tumu Urban Growth Management Area are low under the Bay of Plenty Regional Council Regional Policy Statement (RPS) or can be designed to be mitigated to a low level of risk.</p>

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## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Tumu Kaituna 14 Trust Submission

SmartGrowth Strategy Reference / Section	Item / Area
<b>Part 2: The Growth Challenge   Challenges and Opportunities</b>	
	<p><u>Challenge 5   Safe and efficient movement of people and goods.</u></p> <p>The structure planning for Te Tumu includes two collector / arterial routes, one of which will provide for dedicated public transport lanes to enable regular and efficient public transport connections to both The Sands Sub-Regional Town Centre, where there will be a transport hub, as well as to the wider region through the Papamoa East Interchange and Tauranga Eastern Link.</p> <p>57ha of proposed Employment Zoned land on TK14 combined with the close proximity to The Sands Sub-Regional Town Centre and the Rangiuru Business Park will reduce commuting trips from / to Te Tumu.</p>
	<p><u>Challenge 6   Managing pressure from development on the natural environment, including from more intensive horticultural and agricultural uses.</u></p> <p>The structure planning for Te Tumu included extensive investigations and research on ecology, biodiversity, natural character, landscape and stormwater for the Te Tumu Urban Growth Management Area. The outcomes of these investigations, combined with the areas impacted by natural hazards, is that approximately 46% of the Te Tumu Urban Growth Management is protected and retained as natural areas to provide for environmental protection and amenity for the balance of the land proposed to be urbanised.</p>
	<p><u>Challenge 7   Insufficient funding and financing to deliver on the Strategy.</u></p> <p>As with all urban growth infrastructure funding and financing is a significant challenge to progressing the development of the Te Tumu Urban Growth Management Area.</p> <p>Notwithstanding the infrastructure funding and financing challenge, the scale of Te Tumu and the positive long-term outcomes detailed above, make Te Tumu and viable urban development proposition, that provides regional benefits. This in turn provides a sound basis for long term government, and institutional investment in Te Tumu.</p>

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## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Tumu Kaituna 14 Trust Submission

SmartGrowth Strategy Reference / Section	Item / Area
<b>Part 3: The Spatial Plan</b>	
	<p><u>General:</u></p> <p>The structure planning combined with the extensive investigations, research and reporting for the Te Tumu Urban Growth Management Area addresses the SmartGrowth spatial approach as detailed below.</p>
	<p><u>Chapter 01: Areas to be Protected and Developed Carefully</u></p> <p>As detailed above, the Te Tumu Urban Growth Management Area:</p> <ul style="list-style-type: none"> <li>a) Isn't in a 'No-Go' Area – refer Map 1.</li> <li>b) Has 'Go- Carefully' layers which have been investigated and addressed / accommodated in the structure planning for Te Tumu – refer Map 2.</li> <li>c) Has 'Go- Carefully'- Flooding areas which have been investigated and addressed / accommodated in the structure planning for Te Tumu – refer Map 2a.</li> <li>d) Doesn't contain Highly Productive Land / Soils – refer Map 2b.</li> <li>e) Isn't a 'Go- Carefully'- Hazardous Activities and Industries List area – refer Map 2c.</li> <li>f) Has identified Archaeological Sites which have been included in the in the structure planning for Te Tumu – refer Map 2c.</li> <li>g) Isn't a 'Go- Carefully'- Land Elevation area – refer Map 2d.</li> <li>h) Isn't a 'Go- Carefully'- Land Instability area – refer Map 2e.</li> <li>i) Has 'Go- Carefully'- Liquefaction and Peat Soils areas which have been investigated and addressed / accommodated in the structure planning for Te Tumu – refer Map 2f.</li> </ul>
	<p><u>Chapter 02: Tāngata Whenua</u></p> <p>The structure planning for the Te Tumu Urban Growth Management Area has identified cultural and archaeological sites of significance and had a number of Cultural Impact assessments completed by Iwi/hapu.</p> <p>Combined with this the urbanisation of the Te Tumu Growth Management Area will enable the owners' relationship with their whenua to be recognised and realised for themselves and for their future generations. TK14 owners are the pre-eminent Mana Whenua that take precedence over other Iwi interests that have no ownership in TK14 land.</p> <p>The TK14 Trust Vision can be viewed at <a href="https://www.tumukaituna14.org.nz/our-vision/">https://www.tumukaituna14.org.nz/our-vision/</a></p> <p>The TK14 Trust also went through an owner engagement process in 2022 at which Trustee Guiding Principles were discussed and adopted, for more information go to <a href="https://www.tumukaituna14.org.nz/video-minutes-owners-engagement-hui-5/">https://www.tumukaituna14.org.nz/video-minutes-owners-engagement-hui-5/</a></p>

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## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Tumu Kaituna 14 Trust Submission

SmartGrowth Strategy Reference / Section	Item / Area
<b>Part 3: The Spatial Plan</b>	
	<u>Chapter 03: Climate Resilience</u> The structure planning combined with the extensive investigations, research and reporting for the Te Tumu Urban Growth Management Area addresses the Climate Resilient Development Principles detailed on p67 and addresses the Sea Level Rise anticipated under RCP 8.5 (2090) – refer Figure 16. See also <i>Challenge 4 – Responding to Climate Change</i> above.
	<u>Chapter 04: Te Taiao – Our Environment</u> The structure planning for the Te Tumu Urban Growth Management Area provides for the three Te Taiao – Our Environment Growth Directives as detailed on p85. See also <i>Challenge 6 – Managing pressure from development on the natural environment, including from more intensive horticultural and agricultural uses</i> above.
	<u>Chapter 05: Rural</u> The land at Te Tumu is low quality rural land for Rural production activities
	<u>Chapter 06: Urban Form and Centres</u> The Te Tumu Urban Growth Management Area is clearly identified in UFTI, the Urban form and centres growth directives (p107), and on Map 12 (p109).
	<u>Chapter 07: Housing</u> As detailed above in <i>Challenge 1 - Housing and transport choice in the sub-region</i> ; the Te Tumu Urban Growth Management Area will conservatively provide 6,100 residential dwellings with 1,500 (approx) of these being on the TK14 land for both its owners and the wider market. Many of these dwellings will be affordable dwellings as the land will be leasehold. The scale of the housing opportunity at Te Tumu will also allow for and enable a range of housing typologies to be provided to cater for a wide range of housing needs.
	<u>Chapter 08: Transport</u> As detailed above in <i>Challenge 5   Safe and efficient movement of people and goods</i> ; the structure planning for the Te Tumu Urban Growth Management Area includes two collector / arterial routes, one of which will provide for dedicated public transport lanes to enable regular and efficient public transport connections to both The Sands Sub-Regional Town Centre, where there will be a transport hub, as well as to the wider region through the Papamoa East Interchange and Tauranga Eastern Link. The Transport directives (p118) are also being addressed through the Waka Kotahi / TCC Single Stage Business Case (SSBC) for Te Tumu which is well advanced.

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## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Tumu Kaituna 14 Trust Submission

SmartGrowth Strategy Reference / Section	Item / Area
Part 3: The Spatial Plan	
	<p><u>Chapter 09: Three Waters and Other Infrastructure</u></p> <p>The three waters infrastructure planning for Te Tumu is well advanced and provided for as follows:</p> <ul style="list-style-type: none"> <li>a) <u>Wastewater</u>: Rising mains and pump stations have been planned to connect Te Tumu to the Te Maunga Wastewater Treatment Plant.</li> <li>b) <u>Water</u>: Reservoirs and mains have been planned to connect Te Tumu to the new Waiari Water Treatment Plant.</li> <li>c) <u>Stormwater</u>: The Papamoa Comprehensive Stormwater Consent (RC63636) provides for the urbanisation of Te Tumu including a high-level overflow discharge to the Kaituna River from the Wairakei Stream.</li> </ul>
	<p><u>Chapter 10: Social Infrastructure and Well-Being</u></p> <p>As detailed above in <i>Challenge 3 / Accessible community facilities and infrastructure levels of service aligned with community expectations and needs</i>; the structure planning for the Te Tumu Urban Growth Management Area the TK14 block planning includes a 20ha Active Reserve, a cultural centre and adjoining local centre as well as an owner's campground, and Kura.</p> <p>The close proximity to The Sands Sub-Regional Town Centre will provide access to community facilities, community services as well as extensive retail and employment opportunities.</p>
	<p><u>Chapter 11: Social Infrastructure and Well-Being</u></p> <p>The structure planning for the Te Tumu Urban Growth Management Area provides the Economic development growth directives as detailed on p138.</p>

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## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Tumu Kaituna 14 Trust Submission

<b>Future Development Strategy (FDS) Submission</b>	
<b>Future Development Strategy Reference / Section</b>	<b>Item / Area / Submission</b>
<b>Connected Centres Development Strategy   p 145 - 146</b>	
	As noted above, through the extensive research, investigation and planning carried out on Te Tumu the proposed urbanisation of Te Tumu addresses and satisfies the key objectives and outcomes identified and sought in the SmartGrowth Strategy – see above; accordingly TK14 requests that this section of the FDS contain a statement that SmartGrowth and TCC will commit to work with TK14 and the Te Tumu Landowners to progress a Plan Change for the Te Tumu Urban Growth Management Area so it can be notified before the end of 2024.
<b>Residential Growth Allocations for the Next 30 Years   p 146 - 147</b>	
	TK14 requests that the Table on page 147 be amended as follows: <ul style="list-style-type: none"> <li>a) Te Tumu Dwellings Medium Term (2027-2034); 2,100.</li> <li>b) Te Tumu Dwellings Long Term (2034-2054); 4,000.</li> <li>c) Te Tumu Totals 2024-54; 6,100. This reflects to Te Tumu Structure Planning that has been carried out</li> </ul>
<b>Residential Growth Allocations Beyond 30 Years   p 148</b>	
	TK14 requests that the Table on page 148 be amended as follows: <ul style="list-style-type: none"> <li>a) Te Tumu Dwelling Opportunity Post 2054; 2,000.</li> </ul> This is based on the opportunity over time for increased residential densities to be achieved.
<b>Business Employment Land   p 148</b>	
	TK14 requests that the Table on page 148 be amended as follows: <ul style="list-style-type: none"> <li>a) Te Tumu (Employment Land) Medium Term (2027-2034); 60ha.</li> <li>b) Te Tumu (Employment Land) Medium Term (2034-2054); 0ha.</li> </ul>
<b>Development Infrastructure – Eastern Corridor   p 150 - 151</b>	
	TK14 requests that the Table on page 151 be amended as follows: <p><u>Add:</u></p> <ul style="list-style-type: none"> <li>a) Public transport infrastructure and associated transport corridors for Te Tumu as identified in the Waka Kotahi Single Stage Business Case; <i>Medium Term, Subject to Business Case.</i></li> <li>b) Te Tumu WWPS to Wairakei WWPS and Opal Drive WWPS including associated Rising Main Connections to Te Maunga WWTP; <i>Medium Term, Subject to WSE Funding.</i></li> <li>c) Establishment of a new co-educational secondary school and Kura; <i>Medium Term, Subject to Business Case.</i></li> <li>d) Establishment of a new primary school and Kura; <i>Medium Term, Subject to Business Case.</i></li> </ul> <p><u>Amend:</u></p> <ul style="list-style-type: none"> <li>a) Te Tumu Trunk Mains to read <i>Te Tumu Water Trunk Mains.</i></li> </ul>

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## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Tumu Kaituna 14 Trust Submission

Future Development Strategy Reference / Section	Item / Area / Submission
<b>Future Development Strategy   p 154 - 155</b>	
	<p>TK14 requests that:</p> <ul style="list-style-type: none"> <li>a) Map 18 on page 154 be amended to show Te Tumu moved to <i>Medium Term (2027-2034)</i>.</li> <li>b) Map 19 on page 155 be amended to show Te Tumu with a <i>Potential 6,100+ dwellings</i>.</li> </ul>
<b>Implementing the Strategy   p 157 - 162</b>	
	<p>The implementation of the FDS is vital to:</p> <ul style="list-style-type: none"> <li>1. Ensure that there is a multi-agency coordinated plan to deliver the FDS outcomes within the nominated timelines.</li> <li>2. Provide certainty for public and private sector investment.</li> <li>3. Monitor and measure the FDS.</li> <li>4. Enable long term labour, materials and natural resources planning and investment to deliver the infrastructure and built form outcomes sought in the FDS.</li> </ul> <p>The Implementation Strategy requires significantly more work in the form of a Project Plan and Resourcing Plan that will provide the basis for the SmartGrowth Partnership to provide adequate funding and resources to deliver the FDS.</p> <p>TK14 requests that:</p> <ul style="list-style-type: none"> <li>a) A full Project Plan and Resourcing Plan be prepared for the FDS; and</li> <li>b) Informed by the Project Plan and Resourcing Plan, that a SmartGrowth / FDS Implementation Office be established with adequate funding and resources to deliver the FDS.</li> </ul>
<b>Appendices   Appendix 1   Sub-Region Wide p 154 - 155</b>	
	<p>TK14 requests that:</p> <ul style="list-style-type: none"> <li>a) The Public Transport Item has a new item; <i>PT connections Tauranga to Papamoa East Medium Term (2027-2034)</i>.</li> <li>b) The Community Facilities / Social Infrastructure Item has a new item; <i>Active Reserve at Papamoa East – Te Tumu Medium Term (2027-2034)</i>.</li> </ul>

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## Draft SmartGrowth Strategy 2023-73 &amp; Future Development Strategy | Tumu Kaituna 14 Trust Submission

Future Development Strategy Reference / Section	Item / Area / Submission
Appendices   Appendix 1   Eastern Corridor p 154 - 155	
	<p>TK14 requests that:</p> <ul style="list-style-type: none"> <li>a) The Public Transport Item has a new item; <i>PT connections Tauranga to Papamoa East Medium Term (2027-2034).</i></li> <li>b) The Public Transport Item has a new item; <i>Te Tumu Collector Roads in the 2027-2034 period.</i></li> <li>c) The Road Network Item has a new item; <i>Te Tumu Collector Roads in the 2027-2034 period.</i></li> <li>d) The Road Network Item has a new item; <i>Te Tumu Structure Plan Projects in the 2027-2034 period.</i></li> <li>e) The Wastewater Item has a new item; <i>Te Tumu Structure Plan Projects in the 2027-2034 period.</i></li> <li>f) The Water Supply Item has a new item; <i>Te Tumu Structure Plan Projects in the 2027-2034 period.</i></li> <li>g) The Stormwater Item has the item; a new item; <i>Te Tumu Structure Plan Projects in the 2027-2034 period.</i></li> <li>h) The Stormwater Item has the item; <i>Wairakei to Kaituna Overflow – Phase 2 moved to 2027-2034.</i></li> <li>i) The Community Facilities / Social Infrastructure Item has a new item; <i>Active Reserve at Papamoa East – Te Tumu Medium Term (2027-2034).</i></li> <li>j) The Education Item has a new item; <i>New co-educational secondary school and Kura at Papamoa East – Te Tumu Medium Term (2027-2034).</i></li> <li>k) The Education Item has a new item; <i>New primary school and Kura at Papamoa East – Te Tumu Medium Term (2027-2034).</i></li> </ul>



Feedback – (Submission) to the Public notice of proposed SmartGrowth Strategy implicating policy statement or plan, changes, or variations

(Implicating Clauses 5, 16A, and 21 of Schedule 1, Resource Management Act 1991 – Form 4)

20<sup>th</sup> of October 2023

1. Smartgrowth Leadership Membership is made up of representatives from the three partner councils (Tauranga City Council, Western Bay District Council and Bay of Plenty Regional Council), Tangata Whenua, the NZ Transport Agency and the Bay of Plenty District Health Board.
2. The SMARTGROWTH STRATEGY 2023-2073 is available for feedback (submission). The opportunity to 'Have your say' closes on the 20<sup>th</sup> of October 2023. **Matters within the Smartgrowth Strategy are subject to future plan and policy changes.**
3. The SmartGrowth Strategy 2023 identifies six Transformational Shifts that will lead to the greatest improvement in community wellbeing outcomes, while achieving Strategy Objectives.
4. **Pirirākau Tribal Authority – Incorporated is the representative body for Resource Management statutory rights and interests held by the Pirirākau hapū.** This feedback (submission) is prepared by Julie Shepherd – Pirirākau Tribal Authority Pāhake Aromatawai – Senior Environmental Planner. [pirirakau.hapū@gmail.com](mailto:pirirakau.hapū@gmail.com) Mobile: 0272105522.
5. Pirirākau are not a trade competitor.
6. SmartGrowth was launched in 2000 when leaders in the Western Bay of Plenty recognised the need to work together to positively shape the future of our sub-region.
7. The development of the SmartGrowth Strategy relies on tangata whenua representative groups to inform the work of Smartgrowth relying on 1-2 representatives.
8. The SmartGrowth Strategy information available for the past 12 months details presentations and Combined Tangata Whenua Forums meeting agendas where this details the absence of Pirirākau participation.
9. 'Others' continue to make decisions with very little engagement of consultation. Tangata whenua collectively are not resourced to engage at the required level other than meeting fees of tangata whenua resourcing.
10. The tangata whenua representatives are presented with information not consulted minutes prove the low level of opportunity to engage as well informed or appropriately.

11. The rohe of Pirirākau has been carefully considered by the hapū since the Resource Management Act of 1991 engaging in the kaitiakitanga of their rohe since 2000 around the same time as the launching of SmartGrowth.
12. Pirirākau kaitiakitanga of its rohe has been subsumed by others in terms of decision making where Pirirākau are absent, and they have been largely excluded of SmartGrowth. This continues to threaten the 'hau kainga ahikaroa' (the practice of the true home and its people) of tangata whenua.
13. Pirirākau have consistently sought to protect and secure 'Ki Uta Ki Tai' (the mountains to the sea) of Te Puna, Huharua (Plummers point) the summit of Te Rangituanehu (the Minden), Whakamarama, and the Kaimai Mamaku.
14. Te Puna and Huharua were previously identified as a growth area. The continuance of the Ki Uta Ki Tai security retaining rural character has shifted from a growth area to a potential growth area.
15. **Pirirākau seeks an 'off limit' layer of Te Puna and Huharua involving Whakamarama also** as an agreed consequence of enabling Ōmokoroa full urbanisation. Stop developing the Pirirākau rohe to retain rural character for ecological benefit offsetting the urbanisation of the wider Tauranga growth cells and Ōmokoroa. Honour the promises that were made that inform this.
16. The Pirirākau rohe history of the land and its people details continual loss stop injecting the desire to enable economic gain for others and support its existing natural character in response to the Crown and the continual desire to enable others to take it.
17. Pirirākau do not own the land of their rohe, but they are the responsible kaitiaki and this is the hapū position that responds to our history.
18. Once the Takitimu North Link is built Te Puna, Huharua and Whakamarama will become offline communities and secure natural rohe. And with that the opportunity to be an attractive destination with boutique opportunities.
19. Pirirākau and local community wish to retain the uniqueness of the rohe. We seek to build the essence of this as unique set apart from urbanisation. Key facilities that are missing such as retirement facilities and other necessary services can be designed and allowed for in these ways. We do not have to all fit into the growth strategy to take it all.
20. Invest into the current community facilities and amenity available offsetting from all of the wider development as financial contribution offsets.
21. The Taiao implications against the SmartGrowth Strategy are hugely significant and the Strategy enables and influences this direction. Look to the city at the waterways and how they are largely modified and controlled for flooding management. Look to

Ōmokoroa to see how this is also happening. This is not the Taio that is promised to Pirirākau against historic confiscation and the impacts on our natural environment.

22. The Takitimu North Link was supported to enable State Highway removal from the local community of Te Puna to best protect the balance of the rohe from Urbanisation. Becoming a catchment that laterally dissects the rohe and wai movements are manmade controlled except where Pirirākau were successful in forming agreements to bridge sections where natural flow continues. Of the balance we seek greater recognition and actions provided for by the NPSFM and NPSIB.
23. We have an industrial area in Te Puna which is the highest population area of Pirirākau hau kainga that was not supported and we continue challenges against future development of outcomes imposing greater traffic movements, harder environmental impacts where the Hakao continues to flow as an area of the largest local environmental contention at this time. We want to better understand and participate in the influences that build urbanisation. The SmartGrowth Strategy has become a flagship that continues to propose further impacts, and no one is listening.
24. **As Pirirākau and local community (Te Puna Heartlands) wish to engage directly in the future outlook of the rohe. We seek support for a working group to be resourced in our rohe - community to engage in depth in codesign of our future outcomes.** To occur before the strategy is adopted. Te Puna, Huharua and Whakamarama being an OFF LIMIT plan within the SmartGrowth Strategy.
25. Tangata Whenua engagement is not acceptable in its current form as a tick box undertaking. As outlined the Tangata Whenua representatives within the forums are presented with information that is not shared or discussed widely with their people and Councils know this.
26. As the SmartGrowth Strategy is an official proposal requiring procedural outcomes involving further submissions. Th Smartgrowth Strategy while having some positive outcomes is OPPOSED until a working group is formed and meetings are held with wider Pirirākau hapū and local community is OPPOSED. Please enable the appropriate engagement on this strategy.
27. We do wish to speak to this feedback (submission) with the political panel during the 4-6 December period to provide for an independent working group to contribute to the Proposed SmartGrowth Strategy for review by Pirirākau and Te Puna Heartlands (Community – proposed by the Te Puna Plan jointly with Pirirākau and the Pirirakau Hapū Management Plans 2004, and 2017). This will include hui a hapū and community meetings to provide for actual participation.

Records available of Tangata Whenua Participation detailing presentations, lack of Pirirākau participation and evidence of no direct engagement.

Combined Tāngata Whenua Forum Survey Outcomes - Presentation 27 September 2023

Bay of Plenty Regional Council - Freshwater - Presentation 27 September 2023

Ministry of Housing and Urban Development - Presentation 27 September 2023

Quayside Holdings Ltd - Presentation 27 September 2023

Combined Tāngata Whenua Forum - Agenda 27 September 2023

Combined Tāngata Whenua Forum - Minutes (draft) 28 July 2023

Combined Tāngata Whenua Forum - Presentation Sustainable Bay of Plenty 28 July

Combined Tāngata Whenua Forum - Presentation SmartGrowth Strategy 28 July

Combined Tāngata Whenua Forum - Presentation Waka Kotahi 28 July

Combined Tāngata Whenua Forum - Presentation Transpower & PowerCo 28 July

Combined Tāngata Whenua Forum - Agenda 28 July 2023

Combined Tāngata Whenua Forum - Minutes (Final) 26 May 2023

Combined Tāngata Whenua Forum - Minutes (draft) 26 May 2023

Combined Tāngata Whenua Forum - Presentation Political Champion 26 May 2023

Combined Tāngata Whenua Forum - Agenda 26 May 2023

Combined Tāngata Whenua Forum - Minutes (Final) 28 March 2023

Combined Tāngata Whenua Forum - Minutes (draft) 28 March 2023

Combined Tāngata Whenua Forum - Presentation Māori Housing 28 March 2023

Combined Tāngata Whenua Forum - Presentation 28 March 2023

Combined Tāngata Whenua Forum - Agenda 28 March 2023

Agenda for Combined Tāngata Whenua Forum 28 March 2023

Combined Tāngata Whenua Forum - Minutes (final) 16 December 2022

20 October 2023

SmartGrowth  
[REDACTED]  
Tauranga 3110

Via email: [REDACTED]

Dear Sir/Madam,

**ELEMENT IMF LIMITED: FEEDBACK ON THE DRAFT SMARTGROWTH STRATEGY 2023-2073**

**Introduction**

Element IMF is the developer of the Tauriko Business Estate ('TBE'), which comprises approximately 180 hectares of industrial business land (within 'Stages 1-3'). We are currently working on plan change to the Tauranga City Plan that will enable a further 100 hectare stage of development ('Stage 4').

Element IMF has taken an active interest in all spatial planning and policy processes undertaken within the sub-region over the last 15 years to assure its long-term interests are recognised and provided for. This has included submissions on land use planning, infrastructure and funding policies. We strongly support strategic planning that takes a rational, evidence-based approach. Certainty provided through this process provides the necessary foundation for large scale private sector investment in urban development.

The SmartGrowth settlement strategy anchored in the Regional Policy Statement provided the public policy foundation for our substantial investment at Tauriko. TBE has become a significant strategic industrial node that has supported the economic success of the sub-region.

The Future Development Strategy ('FDS') will become the primary long-term strategy upon which all large-scale long-term decisions and investments are based, by both the public and private sector. The FDS effectively replaces the substantive content of the Regional Policy Statement's Urban Growth Policy. The FDS must be a similarly stable policy instrument to provide the same level of investment certainty.



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## Feedback

Within the Strategy, TBE Stages 1-3 are recognised as “existing urban areas” and/or “industrial zone”, while Stage 4 is identified as a “planned growth area” and is also referred to as the “extension” to the TBE. Land to the south of Stage 4, in the area known as ‘Upper Belk Road’, is identified as a “potential long-term growth area”. We support the identification of these areas as such within the Western Corridor, noting that the Upper Belk Road planned growth area presents the opportunity to incorporate future industrial land-use. This is confirmed in the FDS (page 149), and is thus likewise supported.

To enable the development of TBE Stage 4 (in the short term) and the Upper Belk Road growth area (in the longer term), provision of infrastructure servicing and transportation linkages is critical. In our view the Strategy appropriately identifies the challenges and growth directives surrounding three waters and other infrastructure (within Chapter 09). However, for the growth directives for transport there should be emphasis placed on providing for freight movements to and from the sub-region’s key industrial nodes, such as TBE, and not just the Port of Tauranga. As such the following additional wording is proposed for transport growth directive number 7 (within Chapter 08):

7. *An efficient freight network is enabled to support movement to the Port of Tauranga and key industrial nodes, and contribute to local and wider economic wellbeing.*

Updating the directive as above would provide support at a policy level for a number of the “Critical Enabling Infrastructure” transport requirements identified for the Western Corridor in the FDS (Table 1, page 152), which Element IMF support, including:

- *Tauriko West Enabling Works – Transport Improvements including public transport, walking and cycling*
- *Tauriko Network Connections (Stages 1-3) - SH29 and 29A*
- *Tauriko Network Connections (Stage 4) - SH29 and 29A*
- *Western Corridor Ring Route (SH29 to SH36 - Tauriko Stage 3 Ring Route)*

Further to the above, Element IMF likewise supports the footnote to the FDS Western Corridor “Critical Enabling Infrastructure” table, which outlines:

*“SmartGrowth partners have agreed there is a strong preference and need for Western Corridor transport improvements to be delivered in a single stage within a decade (by 2034) as opposed to the proposed staged delivery over many years potentially extending until 2050 given the significance of the corridor locally and nationally.”*

Given this, we seek that the timeframe for delivery of the *Tauriko Network Connections (Stage 4) - SH29 and 29A* improvements be identified as “medium” rather than “long” to align with the 2034 timing horizon.

Element IMF also support the inclusion of the water and wastewater Critical Enabling Infrastructure requirements identified for the Western Corridor in the FDS (Table 1, page 152), including:

- *Tauriko West Enabling Works – Wastewater and Water Supply*
- *Western Corridor Wastewater Strategy Implementation – Stages 1&2 - Tauriko West/Lower Belk/Keenan Road; Stages 3&4 – Upper Belk/Merrick Road*



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- *Western Corridor Water Supply Strategy Implementation – Stages 1&2 - Tauriko West/Lower Belk/Keenan Road; Stages 3&4 – Upper Belk/Merrick Road*

Notwithstanding the above comments regarding the timing of the *Tauriko Network Connections (Stage 4) - SH29 and 29A* improvements, all of the “Road Network”, “Wastewater” and “Water Supply” infrastructure improvements for the Western Corridor outlined in Appendix A of the Strategy (page 173) are otherwise supported.

We welcome the opportunity to discuss the feedback provided further with SmartGrowth.

Yours sincerely

**Element IMF Limited**



Grant Downing

**Development Manager**



**ELEMENT IMF LTD.**

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**TO:** SmartGrowth Bay of Plenty  
**DATE:** 20 October 2023  
**SUBJECT:** Draft SmartGrowth Strategy  
**SUBMITTED BY:** Zespri International Limited ("Zespri")

## 1. INTRODUCTION

### Zespri and the kiwifruit industry

- 1.1 Zespri is the world's largest marketer of kiwifruit, accounting for about one-third of global kiwifruit trade. Zespri is 100 percent owned by New Zealand kiwifruit growers and has a global team of more than 800 based in Mount Maunganui and throughout Asia, Europe and the Americas. We are the sole exporter of New Zealand kiwifruit beyond Australia.
- 1.2 Our purpose is to help people, communities and the environment around the world thrive through the goodness of kiwifruit, and we work with 2,800 growers in New Zealand and 1,500 growers offshore to provide consumers with fresh, healthy and great-tasting Zespri Green, RubyRed and SunGold Kiwifruit.
- 1.3 In 2022/23, we supplied over 159 million trays of New Zealand kiwifruit and 25 million trays of non-New Zealand fruit to consumers in more than 50 markets, and recorded global operating revenue of NZ\$4.22 billion. Zespri returned \$2.24 billion to growers around New Zealand as direct fruit & service payments in that latest financial year.
- 1.4 The strength of the market demand for premium, tasty, healthy product is such that we can double the value of exports from New Zealand in the next 10 years. The barriers to be overcome are here in New Zealand, particularly in labour, infrastructure and energy.
- 1.5 Zespri is committed to sustainability, with areas of improvement identified right through the supply chain including our pledge that by 2025 we will use 100 percent reusable, recyclable or compostable packaging, do more to help the environment, and to become carbon positive to retailers by 2030.

### Zespri and the kiwifruit industry in the Bay of Plenty

- 1.6 There are over 2,500 kiwifruit orchards in the Bay of Plenty, with an average orchard size of 3.5 hectares.
- 1.7 Kiwifruit regional contributions to the Bay of Plenty were over \$1.7 billion in 2022/23.
- 1.8 The Port of Tauranga handles over 90 percent of all New Zealand kiwifruit exports.
- 1.9 Zespri is the major sponsor of Zespri AIMS Games and a proud sponsor of non-profit organisations in the Bay of Plenty, including the Zespri Young & Healthy Virtual Adventure, Good Neighbour, Ōtanewainuku Kiwi Trust, Surf Life Saving Eastern Region, Youth Search & Rescue and Surfing for Farmers.





## 2. EXECUTIVE SUMMARY

- 2.1 Zespri thanks SmartGrowth for the opportunity to provide an export perspective on the draft SmartGrowth strategy.
- 2.2 The transport and climate resilience chapters are of particular interest for Zespri, with the constraints to future value creation and decarbonisation here in New Zealand – largely driven by policy and regulation and infrastructure underinvestment.
- 2.3 Zespri supports SmartGrowth's approach to climate resilience and growth and asks for the scope to be extended to include regional electricity generation and transmission. This will address the electricity infrastructure deficit, give businesses the confidence to invest in electric plant and equipment, support population wellbeing, accelerate electrification and support regional decarbonisation.
- 2.4 Zespri ask for priority to be placed on Western Bay roading and port infrastructure to increase productivity and efficiency and unlock decarbonisation opportunities.

## 3. THE OUTLOOK

- 3.1 Zespri's strategy for the past two decades has been to drive demand ahead of supply and market demand continues to grow. Despite current headwinds including a poor fruit quality season in the 2022 season, a drop in volumes in the 2023 season, rising costs, adverse weather conditions and regulatory challenges (domestic and international), the opportunities ahead of us to create more value for New Zealand communities are very real.
- 3.2 Over \$1.7 billion of export earnings was distributed throughout the Bay of Plenty in 2022/23, and based on the level of demand we believe we can double value by 2030 if we can overcome the challenges ahead of us, in particular policy and regulatory constraints and underinvestment in infrastructure in the Bay of Plenty (alongside commensurate investment by industry).
- 3.3 As an industry we continue to focus on finding constructive solutions and partnering with government wherever possible to take our industry and communities and New Zealand forward. We are a low-carbon, environmentally and socially conscious industry working to address issues and create opportunities for further value to support growers and their communities.
- 3.4 We support local and central government efforts to tackle climate change and the environmental and social challenges ahead. We encourage government to collaborate with industry to achieve national targets and support adaptation efforts which build our industry's resilience, and help us build economic and commercial prosperity for the region and the country. We also strongly believe businesses must grow in a way which supports people, communities and the environment.
- 3.5 Zespri continues to support adaptation discussions and believes stronger government-industry partnerships and collective decision-making are needed to get the right settings to meet climate change targets. Productivity, profitability and resilience go hand-in-hand with how climate change is factored into decision-making across the public and private sectors.



#### 4. CHAPTER 3: CLIMATE RESILIENCE

- 4.1 Zespri supports the climate resilience principles and growth approach, which align with the Kiwifruit Industry Climate Change Adaptation Plan<sup>1</sup> released late last year. In addition, Zespri would like to see a focus on regional electricity generation and transmission, enabling decarbonisation and accelerating electrification. Investment and priority given to this would:
- Address the electricity infrastructure deficit and increase supply,
  - Ensure electricity supply is ahead of demand,
  - Give the business community confidence to invest in electric plant and equipment,
  - Support population social, environmental and economic wellbeing, and
  - Accelerate electrification, supporting regional decarbonisation and the transition to a low-carbon economy.
- 4.2 Significant investment is required to our region's infrastructure and we need more electricity generation transmission to meet demand growth, particularly as industries look to transition away from fossil fuels and towards electrification, creating a greater dependence on the national electricity supply. The national electricity grid will not meet the estimated 68 percent increase in electricity demand out to 2050<sup>2</sup>. Business NZ called for investment in energy infrastructure to achieve decarbonisation goals<sup>3</sup>.
- 4.3 According to a 2023 Transpower report, achieving "accelerated electrification" by 2035 will require 40 new grid connected generation projects, 30 connections to accommodate increased electricity demand, 10-15 new transmission interconnections and other network investments<sup>4</sup>.
- 4.4 Transpower highlighted Bay of Plenty is at risk of circuit overload from winter 2027. Generation capacity in the Bay of Plenty region is low compared to demand, with almost all our energy supply imported over the Kaimai ranges. It has identified that even if the Kaimai transmission to Tauranga was used at full capacity, this would exceed the ability of the lines to deliver it around the region.
- 4.5 Infrastructure investment underpins business confidence to invest – our postharvest suppliers need to know the electricity infrastructure and supply is available before they can decide to invest in new and expensive electric technologies to run the packing lines and coolstores our supply chain requires. Considering the industry has the goal of doubling volume of the next 10 years, more energy generation and transmission will be needed to deliver that.
- 4.6 There is a huge opportunity to accelerate decarbonisation throughout the New Zealand supply chain if we have the right settings in place, transforming our economy and moving us closer to our net-zero target by 2050.

<sup>1</sup><https://www.zespri.com/content/dam/zespri/nz/sustainability/Zespri-Climate-Change-Adaptation-Plan.pdf>

<sup>2</sup> Transpower *Whakamana I Te Mauri Hiko: Empowering Our Energy Future*: March 2020

<sup>3</sup> Business NZ *Election Priorities for a Better Future*: June 2023 p22

<sup>4</sup> Transpower *Whakamana I Te Mauri Hiko: Empowering Our Energy Future*: March 2020



## 5. CHAPTER 8: TRANSPORT

### Roads

- 5.1 Zespri agrees with the transport growth directives outlined in the strategy, particularly Directive 7 – *an efficient freight network is enabled to support movement to the Port of Tauranga and contribute to local and wider economic wellbeing*. As an export-focused region, home to New Zealand's largest export port and the gateway of our national economy, it's vital local and central government upgrade the region's roads to and from the Port support local and national productivity.
- 5.2 We also support the call from the New Zealand Cargo Owners Council to improve road access to the Port of Tauranga, with bottlenecks stifling productivity<sup>5</sup>.
- 5.2 Western Bay of Plenty Infrastructure Forum's *Tauranga Moana Infrastructure Action Plan*<sup>6</sup> sought government support to address the significant infrastructure deficit in the Bay of Plenty. This is supported by Zespri, Priority One, Tauranga Chamber of Commerce and major businesses including the Port of Tauranga and calls for:
- Upgrading State Highway 29 Tauriko, a major growth area with plans for 24,000 dwellings in a 20-year period,
  - Upgrading the Mount Maunganui industrial area (Hewletts / Hull / Totara) to increase productivity, reduce congestion and increase accessibility to and from the Port of Tauranga, and
  - Supporting and fast tracking the Port of Tauranga berth extension to ensure the port can absorb increased future capacity beyond 2025.

### State Highway 29 Tauriko

- 5.4 Tauriko is a major growth area for Tauranga city, with developed residential land and the Tauriko business estate. Transport connectivity has been the barrier to developing desperately-needed housing supply in this area, negatively impacting affordability. Short-term improvements are underway but need to be completed with urgency.
- 5.5 We note Business NZ's call for the government to use a wide range of funding mechanisms to get better quality infrastructure more quickly and allocate risk and cost<sup>7</sup>.

### Mount Maunganui Industrial Area

- 5.6 Hewletts/Hull/Totara is a key access point in Mount Maunganui, linking the port, airport, and Tauranga suburbs, as well as being a highly valuable and productive industrial area. This access point is at capacity, severely affecting access to work and stunting productivity.
- 5.7 For context, the kiwifruit industry expect to see 300 daily truck trips to and from the Port of

<sup>5</sup>Shipping Gazette: September 9, 2023 p3

<sup>6</sup>[Infrastructure-Action-Plan.pdf \(priorityone.co.nz\)](https://www.priorityone.co.nz/infrastructure-action-plan.pdf)

<sup>7</sup>Business NZ *ibid* p21



Tauranga during the peak of the 2024 season. This number will increase as more orchards come into production.

### Maritime

- 5.7 Zespri requests the scope of the transport chapter to be extended to include support Port of Tauranga infrastructure upgrades, in the form of streamlined consent processes which would:
  - Unlock future economic growth, providing job opportunities here in the Bay of Plenty,
  - Create opportunities for bigger ships to call, increasing per sailing capacity to help reduce port congestion,
  - Create opportunities for bigger ships with lower emissions technologies to call at New Zealand ports,
  - Give the business sector confidence to invest in regional development, supporting industry value creation, and
  - Improve regional, national and international supply chain resiliency.
- 5.8 With upgraded port infrastructure and the right settings in place, the size of the opportunity for our industry and New Zealand Inc is immense. Projections show the New Zealand kiwifruit supply could double volume growth compared to 2022 and double value growth by 2030 to over \$7 billion in sales.
- 5.9 Zespri used 57 charter sailings last year and an additional 13,300 containers, equating to over 172 million trays (1 tray = 3.6kg) of New Zealand kiwifruit shipped to over 50 markets around the world. This amount will increase as the industry continues to grow. We estimate the use of containers to more than double by 2031.
- 5.10 As it stands, the Port of Tauranga's Sulphur Point container berth requires an extension to absorb the increasing demand, where freight volume is forecasted to grow 49-61 percent over the next 10 years. The construction of the berth extension is funded by Port of Tauranga however this is facing an uncertain but long time frame due to the consent sitting with the Environment Court, posing a major risk to New Zealand's imports and exports beyond 2025.
- 5.11 The Port stated in August 2023 that it will run out of space for its container operations in the next two years.
- 5.12 COVID-19 highlighted the significant underinvestment in port infrastructure worldwide, with government policies in response to the pandemic disrupting supply chains and changing consumption patterns worldwide, resulting in significant disruption, uncertainty and rising costs. Together with geopolitical changes, global supply chains are changing significantly.
- 5.13 There is a long-term trend toward larger vessels, driven by cost-efficiency and climate change policy factors (ie low-emissions vessels are generally larger), meaning shipping lines will want to bring larger vessels to New Zealand in future.
- 5.14 Ships using alternative lower-emission fuels will require separate supporting infrastructure to bunker and refuel – all of which requires investment and consents.



- 5.15 New Zealand ports are a critical piece of New Zealand infrastructure and a gateway for the New Zealand economy. Port companies, along with industry, can invest in upgrades and further development but the lengthy processes are costly and hold New Zealand businesses back from meeting current and future demand and increasingly risk making us an inaccessible and expensive trading partner.
- 5.16 Zespri has identified international shipping as critical to reducing our emissions footprint as we work towards our goal of being carbon positive to retail by 2030: we need transformative port infrastructure to achieve this. If larger more-efficient ships can't call at New Zealand ports, exporters will pay more into various ETS and our reputation as environmentally conscious trading partner will be tested. We are working on a green shipping corridor opportunity with one of our shipping partners to drive this work – if successful, it's likely to be the world's first green shipping corridor driven by a customer rather than a port.
- 5.17 NZCCO, of which Zespri is a member, commissioned an independent report anticipating how the cargo and logistics sector will transform in response to government policy and the impact of COVID-19. Key findings were released in September including:
- Bottlenecks in road access to New Zealand ports – particularly Ports of Auckland, Port of Tauranga and Port of Lyttleton. Recommends designating port access roads as State Highways rather than local roads.
  - Lengthy delay to the Port of Tauranga wharf extension restricting access to larger ships
  - Need for more accurate, integrated data and freight forecasts
  - Calls for depoliticised 30-year supply chain infrastructure planning
- 5.18 We also note this aligns with Business NZ's call for Te Waihangā/Infrastructure Commission mandate to be expanded to focus on building the most creative ways possible across central government, local government and the private sector.<sup>8</sup>

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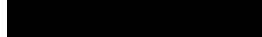
<sup>8</sup> Business NZ *ibid* p21



**Zespri International Limited**  
**October 2023**

For further information, please contact:

Michael Fox  
Head of Global Public Affairs and Communications



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New Zealand Government and Regulatory Affairs Manager





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### Ngā Pōtiki ā Tamapahore Trust - Submission on the Draft Smart Growth Strategy 2023 - 2073

#### Ngā Pōtiki

Ko Mataatua te waka  
 Ko Otawa raua ko Kopulairoa me Maunga Mana nga maunga  
 Ko Rangataua te tahuna  
 Ko Wairakei, raua ko Waitao, Kaiate nga awa  
 Ko Tahuwhakatiki raua ko Mangatawa nga marae  
 Ko Rongomainohorangi raua ko Tamapahore nga whare tupuna  
 Ko Tuwairua raua ko Nga Tuahine nga wharekai  
 Ko Tamapahore raua ko Tamaunuroa me Tamapinaki nga tupuna  
 Ko Te Rangihouhiri a Kahukino te tangata  
 Ko Ngā Pōtiki te iwi

Nga Papaka o Rangataua, he paru paru te kai, he Taniwha nga Tangata  
*The many crabs (people) of Rangataua, eaters of earth, they are demigods.*

Ngā Pōtiki is an iwi of the Mataatua waka. Its takiwā extends from Parakiri to Te Tumu extending out to its seaward territories and inland in Otawa, Kaiate the Waitao Awa catchment and Te Tahuna o Rangataua.

Ngā Pōtiki has two marae, Mangatawa and Tahuwhakatiki. Ngā Pōtiki entities and whānau have substantial landholdings in the Western Bay of Plenty sub-region. Their takiwā contains numerous historical and heritage sites of important and significance to Ngā Pōtiki.

#### Ngā Pōtiki a Tamapahore Trust

The Ngā Pōtiki ā Tamapahore Trust (“**NPaTT**”) is the post-settlement governance entity for Ngā Pōtiki. Ngā Pōtiki signed its deed of settlement with the Crown in 2013. The development of Ngā Pōtiki’s land is very important to Ngā Pōtiki as a means to effect long term post treaty settlement strategies intended to lift the quality of life experienced by Ngā Pōtiki members and where possible mitigate the negative effects of Crown Treaty breaches.

NPaTT is the owner of property in Pāpāmoa and will acquire lands in Truman Lane. It has received and will receive further redress through its Treaty settlement. Ngā Pōtiki is a property developer by necessity given the makeup of its Treaty settlement. As an Iwi developer they are

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interested not only in a commercial return but long-term solutions to local issues and benefits to Ngā Pōtiki in the local community throughout Papamoa, Te Maunga and Mangatawa. This is reflected in the approach taken with the Manawa development, where the Iwi has not taken a purely commercial approach and has included cultural, environmental, economic, and wellbeing factors into the design and operation of Manawa. To date, NPaTT has developed approximately 200 residential sections in the Manawa Development of which no less than 30 percent are owned by a subsidiary of NPaTT, the Manawa Community Housing Trust (a registered Community Housing Provider) which will provide quality affordable housing for Ngā Pōtiki whanāu.

NPaTT has a further 6.3ha of land located on Simpson Road, Papamoa that is currently progressing development master plans for further residential subdivision (Te Akau ki Papamoa) and additional affordable housing for Ngā Pōtiki Whanau.

In addition, NPaTT is currently working through a development agreement to purchase circa 50ha of land located on Tara Road, Papamoa from the Ministry of Housing and Urban Development (MHUD) which MHUD have acquired as part of their land for housing program.

NPaTT is also concerned with the provision of papakainga housing and general Māori land development.

**Other Ngā Pōtiki entities****Contact Details**

This submission is made for and behalf of Ngā Pōtiki ā Tamapahore Trust, contact details for this submission are:

Ngā Pōtiki ā Tamapahore Trust  
PO Box 11491  
Palm Beach  
Pāpāmoa 3151

Attention: Spencer Webster  
Email: [REDACTED]

**Smart Growth Hearings**

We wish to speak in support of our submission.



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Sub No	Consultation Document Part: Area and Item	Page Ref	Submission / Comment	Decision Sought
<b>Consultation Document:</b>				
1	Part 1 - Objectives	17	<p>NPATT generally supports the proposed Environmental, Cultural, Social &amp; Economic Objectives. In particular, NPATT supports the following objectives:</p> <p>Environmental</p> <ul style="list-style-type: none"> <li>• Encourage sustainable development and adaptive planning.</li> <li>• Achieve an integrated approach and accommodate growth within the limits set through Ngā Wai ki Mauao me Maketu which: <ul style="list-style-type: none"> <li>• Recognises the importance of the waters (coastal and freshwater bodies) that flow to Mauao and Maketu and the significance of these two places to tāngata whenua; and</li> <li>• Recognises the linkages between the maunga (mountains), ngāhere (forests), awa (waterways), repo (wetlands), tāhuna (estuaries) and moana (harbours and ocean).</li> </ul> </li> </ul> <p>Cultural</p> <ul style="list-style-type: none"> <li>• Support tāngata whenua values and aspirations, in particular papakāinga development on Māori land.</li> </ul> <p>Social</p> <ul style="list-style-type: none"> <li>• Enable and shape an inclusive, safe, sustainable, efficient, and more vibrant urban form.</li> <li>• Enable and support sufficient housing supply in existing and new urban areas to meet current and future needs, this includes a range of housing types, tenures and price points.</li> </ul> <p>Economic</p> <ul style="list-style-type: none"> <li>• Ensure long-lasting economic, social, environmental and cultural benefits and value for money from the agreed strategy.</li> </ul> <p>However, NPATT notes the following:</p> <ul style="list-style-type: none"> <li>• The focus of the cultural well-being on papakāinga development on Maori land only is myopic and does not address other important issues.</li> </ul>	Adopt the Objectives as notified.

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2	Part 1 – Transformational Shifts – Homes for Everyone	18 - 21	<p>NPaTT supports the principles Ngā Wai ki Mauao me Maketū.</p> <p>However, it notes that Ngā Pōtiki has significant maunga and other landmarks within its rohe.</p> <p>NPaTT supports the Transformational Shifts including the following:</p> <ul style="list-style-type: none"> <li>• 1 – Homes for Everyone</li> <li>• 2 – Opportunities for Whenua Māori</li> <li>• 3. - Emissions Reduction through Connected Centres</li> <li>• 4 – Strong Economic Corridors Linking the East to the City and Port</li> <li>• 5 – Restore and enhance ecosystems for future generations</li> <li>• 6 – Change to the delivery, funding and financial model for growth.</li> </ul>	Adopt the proposed Transformational Shifts as notified.
3	Part 2 – Challenges & Opportunities Housing Choice	38	<p><u>Challenge 1</u></p> <p>NPaTT agree with and support the challenge that housing demand is outstripping available supply and recognises the current affordability issues around housing.</p> <p>NPaTT also acknowledge that the availability of land supply for housing is an issue.</p>	Adopt the challenge as notified
4	Part 2 – Challenges & Opportunities Tangata Whenua Challenges	38	<p><u>Challenge 2</u></p> <p>NPaTT agree with and support the challenge of enabling Tangata Whenua to realise values and aspiration for their whenua and state further:</p> <ul style="list-style-type: none"> <li>• Development of Maori land is also hampered by zoning rules and other regulations that do not reflect the needs or aspirations of Maori.</li> </ul>	Adopt the challenge as notified
5	Part 2 - Opportunities	40	<p>NPaTT support the following opportunities relating to growth, the natural environment, cultural identity, and the economy:</p> <ul style="list-style-type: none"> <li>• Partnering with mana whenua to include iwi, hapū and marae aspirations in spatial planning in a purposeful and meaningful way</li> <li>• Enabling development of multiple owned Māori Land and Treaty Settlement Land to enhance cultural, social and economic wellbeing</li> <li>• Addressing housing needs, including access to affordable housing and improved liveability through good placemaking and amenities.</li> <li>• Achieving an integrated approach and accommodating growth within the limits set through Ngā Wai ki Mauao me Maketu which:</li> </ul>	Adopt the listed opportunities as notified

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			<ul style="list-style-type: none"> <li>- Recognises the importance of the waters (coastal and freshwater bodies) that flow to Mauao and Maketu and the significance of these two places to tāngata whenua; and</li> <li>- Recognises the linkages between the maunga (mountains), ngāhere (forests), awa (waterways), repo (wetlands), tāhuna (estuaries) and moana (harbours and ocean).</li> <li>• Providing a platform for a more certain environment for the funding of development and housing provision, to better meet the needs of the community, leading to improved wellbeing and economic performance.</li> </ul>	
6	Part 2 – Map 1	53	As identified in the introduction, NPATT are currently working through a development agreement with MHUD for the purchase of circa 50ha of land located at Tara Road, Papamoa legally described as Section 19 SO 489379, Sections 25, 26 and 27 SO 457368. NPATT support the land not being identified as a “no go area” on Map 1.	Adopt Map 1 as notified in relation to land located to the south of Tara Road, Papamoa legally described as Section 19 SO 489379, Sections 25, 26 and 27 SO 457368,
7	Part 2 – Map 2 and Map 2a	54	As identified above, NPATT are currently working through a development agreement with MHUD for the purchase of circa 50ha of land located at Tara Road, Papamoa. NPATT acknowledge that there are some constraints on the subject site and acknowledge its inclusion as a “go carefully” and flood identification layers with respect to natural hazards.	Adopt Map 2 & 2a as notified in relation to land located to the south of Tara Road, Papamoa legally described as Section 19 SO 489379, Sections 25, 26 and 27 SO 457368,
8	Part 2 – Map 2b	55	As identified above, NPATT are currently working through a development agreement with MHUD for the purchase of circa 50ha of land located at Tara Road, Papamoa. Map 2B appears to show the subject land as LUC 2, which is identified as Highly Productive Land under the National Policy Statement for Highly Productive Land. It is acknowledged that whilst the land is mapped as Class 2, this will require site specific investigation and NPATT acknowledge the go carefully approach here.	Adopt Map 2b as notified in relation to land located to the south of Tara Road, Papamoa legally described as Section 19 SO 489379, Sections 25, 26 and 27 SO 457368, with caution that site specific land use capability

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				assessment will be required
9	Part 2 – Chapter 2 - Tangata Whenua	59	NPATT generally support the Tangata Whenua Perspectives on Growth Management in term of the economic, cultural, social, and environmental matters listed.	Adopt the Tanga Whenua perspectives as notified
10	Part 2 – Chapter 2 - Tangata Whenua	60	NPATT generally support the principles of the NPS-UD as noted, including: <ul style="list-style-type: none"> <li>Well-functioning urban environments have a variety of homes that enable Māori to express their cultural traditions and norms.</li> <li>A Future Development Strategy must include a clear statement of hapū and iwi values and aspirations for urban development.</li> </ul>	Adopt the statements on Page 60 as notified
11	Part 2 – Chapter 2 - Tangata Whenua	60	NPATT generally support the Tangata whenua partnership in smart growth and the following outcomes, including: <p>Te Whenua: Our people are enabled to occupy, develop and use multiple owned Māori Land and Treaty Settlement Land.</p> <p>Te Ngākau: Our marae communities are connected to social and health services, education and sporting facilities, and where practical, public transport\</p> <p>Nga Wahi Tupuna: Our sites and areas of cultural significance are cared for and protected from further degradation and loss</p> <p>Te Taiao: The health and wellbeing of our natural environment is not compromised further as a result of land use and development</p> <p>Te Manawaroa: Our communities and cultural infrastructure are resilient to a changing climate.</p>	Adopt the outcomes on Page 60 as notified
11	Part 2 – Chapter 2 - Tangata Whenua	62 & 63	NPATT generally support the stated key Tangata whenua challenges and acknowledge and reiterate that these are real work issues facing tangata whenua including: <ul style="list-style-type: none"> <li>Building homes on multiple-owned Māori land is challenging and takes a long time</li> <li>Housing and rental affordability is a significant issue for many Māori communities</li> <li>Adverse impacts of continued urban, commercial, and industrial development on Māori Land as well as sites, areas and landscapes of cultural significance.</li> </ul>	Adopt and acknowledge the issues listed on page 62 & 63

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			<ul style="list-style-type: none"> <li>Cumulative and potentially irreparable impact of uncontrolled urban development on the natural environment.</li> <li>Growing risk of natural hazards and climate change on marae and waahi tapu.</li> <li>Recognition of commercial redress outcomes of treaty settlements.</li> </ul>	
12	Part 2 – Chapter 2 - Tangata Whenua	63	<p>NPaTT support the proposed tangata whenua growth directives as listed:</p> <ol style="list-style-type: none"> <li>Support and realise tāngata whenua aspirations for Māori land and papakāinga development in urban areas and in the rural environment.</li> <li>Sites and areas of cultural significance are protected and avoided by development, and the values of those areas are enhanced.</li> <li>Tāngata whenua are actively involved in local level spatial planning, climate change adaptation planning and implementation of the Strategy.</li> <li>Improve access to collectively owned Māori assets in the region for benefit of iwi, hapū and whānau</li> </ol>	Adopt tangata whenua growth directives as listed
13	Part 2 – Chapter 2 - Tangata Whenua	64	NPaTT generally support the production of Map 3 showing the cultural landscape but note that this Map is prepared at a high level and does not include all significant cultural features within the Region.	Adopt Map 3 as notified, however suggest to tread with caution on identification of all significant cultural areas
14	Part 2 – Chapter 2 - Tangata Whenua	65	As identified above, NPaTT are currently working through a development agreement with MHUD for the purchase of circa 50ha of land located at Tara Road, Papamoa. Map 3B includes general areas for Māori land development which NPaTT supports, however it considers that Māori owned land, that is not Māori land as defined by Te Ture Whenua, could also be considered as a Māori development focus area.	Adopt Map 3 as notified, but include the land located to the south of Tara Road legally described as Section 19 SO 489379, Sections 25, 26 and 27 SO 457368 as a potential focus area.
15	Part 2 – Chapter 3 – Climate Resilience	71 - 72	Figures 17 and 18 on Pages 71 & 72 respectively show a snapshot of climate change risk to the western Bay of Plenty. It is notes that the land NPaTT is interested in, being Section 19 SO 489379, Sections 25, 26 and 27 SO 457368 are shown as being	Amend Figures 17 & 18 on Pages 71 and 72 to include Section 19 SO 489379, Sections

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			located within the WBOPDC jurisdiction on Figure 17, and should more correctly be sown within the TCC jurisdiction on Figure 18.	25, 26 and 27 SO 457368 within the TCC jurisdictional boundaries
16	Part 2 – Chapter 7 - Housing	111 , 112 , 113	NPaTT acknowledges that Maori are disproportionately affected by the underperformance of the housing system and supports the notion that significant housing opportunities exist for Maori owned land.  NPaTT also recognise the wider housing system issues identified on Page 112.	Adopt identification of housing issues identified on Pages 111, 112, 113 as notified.
17	Part 2 – Chapter 7 - Housing	114	NPaTT support the housing system growth directives as listed:  Housing system growth directives  1. Support and realise tāngata whenua aspirations for Māori land and papakāinga development in urban areas and in the rural environment.  2. Deliver the place-based housing plan through collaboration and leadership.  3. A range of housing types, tenures and price points is provided within all growth areas and Māori land.  4. Affordable housing supply is increased and targeted to stressed households (renters – submarket and market; alternative tenures; progressive ownership; iwi).  5. Urgently reduce households being housed in unsatisfactory emergency accommodation.  6. Public housing supply is increased and aligns the typologies of new and existing housing stock to match the needs of the community.  7. Demonstrate mixed tenures and housing typologies through intensification projects. 8. Proactively support the delivery of social and affordable housing in existing urban areas and growth areas.	Adopt housing system growth directives as notified.
18	Part 4 – Future Development Strategy	154	Map 18 – Future Development Strategy – Staging Map  As identified above, NPaTT are currently working through a development agreement with MHUD for the purchase of circa 50ha of land located at Tara Road, Papamoa.	Amend the FDS map 18 to include Section 19 SO 489379, Sections 25, 26 and 27 SO 457368 as staged

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			<p>The sites are located on the southern side of Tara Road and are legally described as Section 19 SO 489379, Sections 25, 26 and 27 SO 457368,</p> <p>NPaTT have invested heavily in the site in recent times with detailed master planning being undertaken, serving investigations and detailed geotechnical assessment having taken place.</p> <p>The current estimated residential yield for the land sits at between 550 – 600 residential allotments.</p> <p>Whilst the land has some constraints such as the ground conditions and stormwater management (which is also a wider catchment issue) work undertaken to date suggests that there are emerging solutions to mitigate and deal with the land constraints.</p> <p>The development of the land will significantly assist with the shortfall of housing identified (Page 143) and time estimates to date suggest that the land could be developed with properties becoming available over the next 4 – 10 years.</p> <p>The land is close to Transportation links, having direct access to Tara Road via the existing Doncaster Drive/Tara Road roundabout and is also in close proximity to the Tauranga Eastern Link for employment opportunities in the nearby Rangiuru Business Park, whilst also being a short distance from the Papamoa commercial centre, the new eastern commercial centre and Te Puke.</p> <p>NPaTT therefore request that the land be identified on Map 18 as a future staged growth area.</p>	growth areas either for the short term or medium term
19	Part 4 – Future Development Strategy	156	<p>Map 20 – Marae Centres &amp; Maori Land Development Focus Areas</p> <p>NPaTT support the inclusion of Map 20 and seek that the land at Tara Road legally described as Section 19 SO 489379, Sections 25, 26 and 27 SO 45736 be identified for Maori development purposes.</p>	Adopt Map 20, with the amendment to include Section 19 SO 489379, Sections 25, 26 and 27 SO 457368 for Maori development.



Property Council New Zealand

Submission on  
Draft SmartGrowth Strategy 2023-2073

20/10/2023

For more information and further queries, please contact
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20 October 2023  
SmartGrowth  
306 Cameron Road  
Tauranga 3143

## Draft SmartGrowth Strategy 2023-2073

### 1. Summary

- 1.1 Property Council New Zealand Central Committee ("Property Council") welcomes the opportunity to provide input on the draft SmartGrowth Strategy 2023-2073. Comments and recommendations are provided on issues relevant to Property Council's members.

### 2. Recommendations

- 2.1 At a high level, we recommend that SmartGrowth:
- Undertakes work to further refine the 'transformational shifts' for change;
  - Ensures a flexible approach to future land supply (residential and business) that accounts for changing variables;
  - Develops viable and alternative approaches to funding and financing for growth-related infrastructure; and
  - Co-ordinates and collaborates with Future Proof in the Waikato.

### 3. Introduction

- 3.1 Property Council is the leading not-for-profit advocate for New Zealand's most significant industry, property. Our organisational purpose is, "Together, shaping cities where communities thrive".
- 3.2 The property sector shapes New Zealand's social, economic and environmental fabric. Property Council advocates for the creation and retention of a well-designed, functional and sustainable built environment, in order to contribute to the overall prosperity and well-being of New Zealand.
- 3.3 Property is the largest industry in the Bay of Plenty. Property provides a direct contribution to the Bay of Plenty GDP of \$2 billion (13 percent) and employment for 11,730 Bay of Plenty residents.
- 3.4 Property Council is the collective voice of the property industry. We connect property professionals and represent the interests of 66 Bay of Plenty based member companies across the private, public and charitable sectors.

### 4. 'Transformational shifts'

- 4.1 Property Council welcomes the intent behind many of proposed 'transformational shifts' for the region and wishes to thank SmartGrowth for their work to date. The draft SmartGrowth Strategy currently identifies six 'transformational shifts' for change, which are intended to provide guidance when it comes to implementing the SmartGrowth strategy.

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4.2 The proposed 'transformational shifts' are:

- I. *Homes for Everyone*
- II. *Marae as Centres and Opportunities for Whenua Māori*
- III. *Emissions Reduction through Connected Centres*
- IV. *Strong economic corridors linking the East and West to the City and the Port*
- V. *Restore and enhance eco-systems for future generations; and*
- VI. *Radical change to the delivery, funding, and financing model for growth.*

4.3 We believe that there are additional factors that should also be taken into account for the 'transformational shifts' in the finalised SmartGrowth strategy. Property Council recommends that SmartGrowth undertakes work to further refine the 'transformational shifts' for change.

4.4 For example, greater consideration of access to public amenities and by extension the development of thriving communities. Access to public amenities and community has been affected by historic underinvestment across the region, and in our view, should be considered with the 'transformational shifts'.

4.5 We recommend expanding the proposed eco-system 'transformational shift' to include environmental and climate resilience, especially in light of this year's extreme weather events. Furthermore, we note the ongoing economic imperative to protect the region's highly productive land within the proposed shifts and wish to also see this incorporated within the framework.

## 5. Data and Analysis

5.1 Property Council acknowledges the work undertaken to develop residential population growth and housing capacity estimates. While we are comfortable with the modelling as it currently stands, we would note that population growth and housing capacity modelling is not an exact science. There are a wide range of changing variables such as immigration settings or internal migration patterns. It is important to ensure that a flexible approach is taken, that can account for changing variables over time.

5.2 For example, if population growth tracks higher than forecast, it would be important to ensure additional residential land supply over and above what is currently catered for. Furthermore, as SmartGrowth partner councils impose more requirements or overlays on land, such as the Slope Hazard Overlay released in October 2023 by Tauranga City Council, there is risk that this could impact negatively on the housing capacity modelling.

5.3 Property Council acknowledges the work undertaken to develop business and industrial demand and capacity modelling. We note that there has been significant business and industrial land price inflation in recent years, largely as a result of shortages of land supply. This impacts the economic competitiveness of the region and limits our capacity to attract much needed new investment. There are a wide range of variables when it comes to business and industrial modelling which include uncertainty regarding the future of industrial land in the Mount Manganui area or increased demand associated with proposed expansion of the Port of Tauranga.



- 5.4 Accordingly, Property Council recommends that SmartGrowth ensures a flexible approach to future land supply (residential and business) that accounts for changing variables. This will help maintain competitive land markets across the region and help prevent unintended consequences such as shortages of housing or lack of land for business.

## 6. Future Development Strategy

### Connected Centres approach

- 6.1 Property Council broadly supports SmartGrowth's Connected Centres Development Strategy. We welcome high quality urban intensification, as our members know that it will help Tauranga and the wider Bay of Plenty achieve outcomes that meet the region's housing, environmental, social and economic ambitions. Property Council also welcomes the intent to encourage the development of thriving local and town centres that provide for greater social and economic opportunities for residents and businesses.
- 6.2 In terms of the proposed Key Growth Areas, while Property Council supports the intent behind classifying the Eastern Centre as a Key Growth Area, we are concerned that there appears to not have been sufficient preparatory work undertaken to evaluate and lay the groundwork for future urban development in the area. Additionally, we would also suggest that SmartGrowth should further investigate the development potential of Te Puna area and the wider northern corridor, for both residential and business developments.

### Development Infrastructure

- 6.3 The draft SmartGrowth strategy sets out timing for growth-related infrastructure required to support urban growth areas over time. Property Council notes that numerous projects are either partially funded or not funded. Property Council recommends that SmartGrowth and its partner Councils undertake work to develop viable and alternative approaches to funding and financing for growth-related infrastructure.
- 6.4 Property Council advocates for the use of transparent, beneficiary pays alternative funding models for local government, especially in terms of delivering critically needed infrastructure. Examples of these models include targeted rates, user-pays systems, and Special Purpose Vehicles ("SPVs") as enabled under the Infrastructure Funding and Financing Act ("IFF").
- 6.5 In particular, we strongly support use of the IFF Act to fund infrastructure and investment. We have previously championed Tauranga City Council's use of the IFF Act for other projects, such as the Transport System Plan or Civic Precinct. Ultimately, this approach makes the cost of new infrastructure more transparent, improves intergenerational equity by spreading the cost over a sustained time period and also unlocks additional infrastructure investment.
- 6.6 Property Council also strongly supports continued advocacy from SmartGrowth and its partners for greater central government investment in development enabling infrastructure. We firmly support future investment from central government for infrastructure that unlocks critically needed new housing supply across the region, as well as for transport infrastructure such as State Highway 29. Co-funding infrastructure with central government in an important funding tool, that helps alleviates part of the burden of the burden on local ratepayers.



## 7. Implementation Plan

- 7.1 The future success of the SmartGrowth initiative will depend on the ability of SmartGrowth partners to effectively implement the proposed strategy. It is critical that effective long-term planning translates to practical outcomes, in terms of factors such as infrastructure provision, land supply or transport. Historically, the Bay of Plenty region has struggled at times to effectively implement past SmartGrowth strategies.
- 7.2 Effective implementation will require SmartGrowth partners to clearly enshrine the proposed SmartGrowth 2023-2073 strategy into their approach to matters such as Long-term Plans, Annual Plans, and other key plans and policies. Given the timeframe on which the proposed SmartGrowth strategy operates, it is also important that implementation is durable across political cycles to ensure certainty across the region.
- 7.3 There is a clear relationship between planning outcomes in the Bay of Plenty region and planning outcomes in the Waikato. Effective alignment between both regions is vital for meeting our economic, social and environment objectives. Property Council recommends that SmartGrowth should co-ordinate and collaborate with Future Proof in the Waikato.

## 8. Conclusion

- 8.1 Property Council broadly supports the direction of the draft SmartGrowth Strategy 2023-2073. Moving forward, it is important to develop alternative approaches to funding and financing infrastructure for the region. As outlined in our submission, we are of the view that there are further refinements to the strategy that should be considered.
- 8.2 Property Council members invest, own, and develop property in the Bay of Plenty region. Thank you for the opportunity to submit on the Draft SmartGrowth Strategy 2023-2073, as this gives our members a chance to have their say in the future of our region.
- 8.3 Any further enquires do not hesitate to contact Logan Rainey, Advocacy Advisor, via email: [REDACTED]

Yours Sincerely,

Morgan Jones

Central Committee Chair

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**SUBMISSION ON THE DRAFT SMARTGROWTH STRATEGY 2023**

**TO:** Western Bay of Plenty District Council, Tauranga City Council,  
and Bay of Plenty Regional Council, tāngata whenua and  
Central Government ("**SmartGrowth Partnership**")

**SUBMITTER:** Waste Management NZ Limited ("**Waste Management**")

**SUBMISSION ON:** The Draft SmartGrowth Strategy 2023 ("**SmartGrowth Strategy**")

**Summary**

1. Waste Management is New Zealand's leading waste operator. We are strongly committed to ensuring our projects and operations contribute to positive outcomes for New Zealand's environment and communities.
2. In the Bay of Plenty, Waste Management owns and operates several facilities including a materials recovery facility and industrial waste processing facility which are both located at 55 Truman Lane ("**Truman Lane Site**"), and an oil recovery facility at 218 Totara Street, Mount Maunganui ("**Oil Recovery Site**"). The Truman Lane Site and Oil Recovery Site are both located in areas subject to the proposals included within the SmartGrowth Strategy.
3. It is essential that the SmartGrowth Strategy, particularly the draft Spatial Plan and Future Development Strategy, appropriately provide for existing industry and its needs, and recognise the substantial benefits industry provides to Tauranga and the wider region.
4. Waste Management remains committed to being a good neighbour at its sites, including the Truman Lane Site and Oil Recovery Site. Waste Management has endeavoured to develop those sites in line with environmental best practice, and is committed to finding technical solutions to address any potential issues and concerns raised.
5. In our view, there is a balance to be struck between enabling and providing for industry, that has a practical and substantial economic benefit to the City and Region, as well as providing for intensified residential development and the need to manage future development in hazard-prone areas. Waste Management considers that some of the proposals and directions within the SmartGrowth Strategy require further consultation and ultimately refinement, to ensure they provide for a pragmatic and workable approach to addressing those competing interests.

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**Scope of submission**

6. The submission aims to assist the SmartGrowth Partnership in progressing the SmartGrowth Strategy, but in particular is focused on Waste Management's interests in the Truman Lane Site and Oil Recovery Site.

**Specific reasons for submission**

7. The SmartGrowth Strategy includes proposed directions relating to the avoidance of development within certain significant or at-risk areas, while balancing the need to ensure greater, intensified residential development is provided for within the Western Bay of Plenty subregion.
8. To achieve those goals, the SmartGrowth Strategy includes:
  - (a) **general growth directives** that seek to avoid development in areas that are at risk from natural hazard risks, where possible. Waste Management's submission is focused on its concerns to ensure that a blunt, blanket approach to development in areas at risk of natural hazards is not created through the SmartGrowth Strategy, particularly where the risk of natural hazards on development can be adequately and appropriately mitigated.
  - (b) **housing directives** including direction to support and realise tāngata whenua aspirations for Māori land and papakāinga development in urban areas, as well as increase the public housing supply to proactively support the delivery of social and affordable housing in existing urban areas. Waste Management's submission in this regard is focused on ensuring intensified residential and other sensitive activities are developed in appropriate areas, in order to promote community health and wellbeing and mitigate reverse sensitivity effects (where relevant) on nearby existing industrial activities in close proximity to areas proposed for intensification.

**General Growth Directives***Natural hazards*

9. Waste Management acknowledges the SmartGrowth Strategy's intention to address pressures on the environment, and its desire to proactively plan for the management of natural hazard risks, climate change, and ensuring any future development is provided for in areas that are not constrained due to those hazards.

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- 10. The Truman Lane Site and Oil Recovery Site are identified in the SmartGrowth Strategy's snapshot of climate risks for Tauranga City as being at risk of coastal hazards.<sup>1</sup> While the colouring on Map 1 of the SmartGrowth Strategy is unclear, it appears the Truman Lane Site is located within a "No-Go – Area to Protect and Avoid" overlay.<sup>2</sup>
- 11. While Waste Management is generally supportive of the approach to avoid areas at high natural hazard risk, Waste Management is also conscious that there are a range of existing incentives on landowners and infrastructure providers to ensure that any future development occurs in a way that appropriately manages those natural hazard risks. Council's approach to blacklisting areas that could potentially be developed, subject to appropriate natural hazard mitigation, is overly blunt, especially when an appropriate engineering solution could be put in place that appropriately manages the risk. Given the shortfall of existing industrial zoned land within the sub-region, Waste Management considers a pragmatic approach is necessary in this regard.
- 12. In developing an approach to managing development and land use in areas subject to natural hazards, the SmartGrowth Partnership must consider other incentives on landowners and infrastructure providers to provide for high quality developments that address, manage and mitigate hazards (for example, recognising the greater stringency of building standards with regard to obtaining building consent or insurance).
- 13. Waste Management considers that it is critical that the SmartGrowth Strategy does not unnecessarily constrain development and land use of its sites, particularly where other alternatives are available to manage those natural hazard risks.

**Housing directives**

*Marae and Māori land development focus areas*

- 14. Waste Management acknowledges its neighbours in the Bay of Plenty, including the Whareroa marae and recognises the aspirations of tāngata whenua for Māori land and papakāinga development in urban areas. Of relevance to Waste Management is the SmartGrowth Strategy's identification of the Whareroa marae and its surrounding area (including its Oil Recovery Site) as a Marae and Māori land development focus area.
- 15. As recently submitted on in the context of the Mount to Arataki Spatial Plan, Waste Management acknowledges the desire to improve matters at the Whareroa marae. Waste Manangement is continuing to consult with local iwi and make sure that its operations are

<sup>1</sup> SmartGrowth Strategy, at page 72.  
<sup>2</sup> SmartGrowth Strategy, at page 53.



aligned with finding the right balance to enable industry while addressing concerns about any environmental effects. Waste Management considers there are opportunities for the Whareroa marae and adjacent focus areas to work with industry in a way that recognises the neighbouring industrial land use in the area, and to integrate any activities at the marae with those existing industrial land uses (ie avoiding residential development in proximity to industrial activity, and provisioning for appropriate land use buffers).

- 16. Where careful and appropriate integration between land uses is achieved, Waste Management considers this would be a significant opportunity that will enhance the positive impacts on the Whareroa marae and adjacent development focus areas, providing for the Whareroa community's wellbeing.

*Increasing housing supply*

- 17. Waste Management acknowledges that housing supply is an important issue for New Zealand, Tauranga and the Western Bay of Plenty subregion, and that it is appropriate that steps are being taken to address it by enabling intensified housing within the Tauranga urban area. However, it is essential that industry and infrastructure that supports well-functioning urban environments, are not adversely impacted by new, intensified housing and that future residents are located in appropriate living environments.
- 18. The SmartGrowth Strategy expressly identifies the suburb of Arataki as an existing urban area intended for increased density and housing choice.<sup>3</sup> This area is directly across State Highway 2 from the Truman Lane Site.
- 19. There is an inherent conflict within the SmartGrowth Strategy in that, while it recognises the need to provide for industrial land and outlines that the development and / or redevelopment of existing industrial zoned land will help meet the shortfall in demand, it also directs for intensified residential development in areas proximate to those existing industrial areas (including the Truman Lane Site and Oil Recovery Site). It is fundamental that that conflict is well-managed to ensure existing industrial activities can continue occurring without undue constraints, as well as to ensure that communities are located in healthy living environments.
- 20. Intensified residential development built in proximity to industry and infrastructure, such as the Truman Lane Site and Oil Recovery Site, have the potential to give rise to reverse sensitivity effects, which can lead to constraints being placed on the activities being undertaken at those sites. While Waste Management is committed to being a good neighbour and endeavours to internalise as much of its effects as possible, the nature of Waste Management's operations

<sup>3</sup> SmartGrowth Strategy, Map 11: Land Use.





(and acknowledging that this is the same reality for industrial activities more generally) means it cannot practicably internalise all of its effects in every instance, and any increase in the number of residents in proximity to its activities means an increase in the number of receivers of potentially adverse effects.

*Need for greater certainty and recognition of industries and existing industrial land uses*

- 21. The SmartGrowth Strategy clearly sets out that the sub-regional demand for business land, including industrial land, is set to grow over the next 30-years.<sup>4</sup> However, it is unclear how the SmartGrowth Strategy intends on meeting anticipated demand for industrial land, in its current form.
  
- 22. While there is a clear need for industrial land in the future, similar to the Mount to Arataki Spatial Plan, there is a lack of recognition in the SmartGrowth Strategy around the significant benefits that industry provides, as well as the actions industries currently take to reduce their impacts. Waste Management considers that the SmartGrowth Partnership must provide greater certainty for industries in the SmartGrowth Strategy. This includes through:
  - (a) equal recognition of existing industrial uses, particularly at the Truman Lane Site and the Oil Recovery Site, as well as recognition of the constraints industries face which otherwise hinders their ability to internalise all of their effects, as discussed above; and
  - (b) recognition of the adverse health and amenity effects and reverse sensitivity effects, should residential housing be directed in proximity to effects-generating industrial activity.

<sup>4</sup> SmartGrowth Strategy, page 148.

**Next steps**

23. Waste Management wishes to be heard in support of this submission. If other parties make similar submissions, Waste Management would consider presenting a joint case with those parties at the Kanohi ki te kanohi (face-to-face).

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Head of Environment and Consents

**Date:** 20 October 2023

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## Private Submission on Smartgrowth Plan

Julie Andrews

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### Intro - Vision, Objectives and Transformational Shifts

I am pleased to have the opportunity to submit on the Smartgrowth Strategy. I support the vision and objectives of the Strategy. I also largely agree with the transformational shifts identified by the Strategy, in particular homes for everyone, emissions reduction, restoring and enhancing ecosystems and changing the model for growth. I do not necessarily agree with the proposed “how” which is incorporated into transformational shifts 8.3 and 8.6 in the Statement of Proposal – see “Comments” below.

### Comments on Transformational shifts

- **8.3 - Emissions reduction** - I question whether this can be achieved through the proposed Connected Centres
- **8.6 - Change to delivery, funding and financing model for growth** - I believe this should be done through government funding, not PPPs. PPPs have proved financially disastrous in other parts of the world (eg the UK). Refer <https://jubileedebt.org.uk/wp-content/uploads/2017/02/The-UKs-PPPs-disaster-Final-version-02.17.pdf> - “Lessons on private finance for the rest of the world”. Below is an extract:

This briefing sets out the major problems and risks the UK has encountered through its extensive experiment with PPPs, including how they have:

- Cost the government more than if it had funded the public infrastructure by borrowing money itself
- Led to large windfall gains for the private companies involved, at public expense
- Enabled tax avoidance through offshore ownership
- Led to declining service standards and staffing levels
- Hollowed out state capacity to design, build, finance and operate infrastructure
- Eroded democratic accountability

PPPs are hugely unpopular in the UK, with 68% of respondents to a survey in England saying PPPs should be banned.<sup>5</sup> In Scotland, which has a higher proportion of projects per person, 76% of respondents say they should be banned. This unpopularity has led to PFI being rebranded in both England and Scotland (see section 5 on page 7).

Emissions reduction is critical. As is noted in the Strategy, climate events are changing the way we live. Climate change is accelerating at rate that is surprising (and terrifying) even the experts. It follows from this that everything we do needs to be first viewed through the lens of climate mitigation and adaptation.

Two of my primary concerns are that:

1. the Connected Centres model in association with greenfields development is not the best option to achieve the objectives of the Strategy. In particular there is no evidence that implementing the Strategy will result in the large reductions in carbon emissions that are

required. We need an evidence-based carbon emissions analysis to make informed decisions.

2. the housing proposed in the Strategy will not result in “homes for everyone”. I am concerned about a shortage of affordable homes and preventing the growing homelessness we are seeing in the community.

### Process and general comments

I fully appreciate that there are huge challenges and complexities in managing growth. I also appreciate that the Smartgrowth Strategy is a planning framework only which will be amended and refined following feedback and will continue to be developed as circumstances change and more data becomes available.

As I have mentioned, evidence-based carbon emissions data and analysis are an essential part of this process.

In terms of feedback, I have found the sheer amount of information and the short period of time allowed for submissions to be overwhelming and offputting. I also found the conflicting numbers, areas and timeframes shown in tables and maps in the Strategy document (mainly to do with growth and intensification), made the process of submitting even more difficult.

I think most people in Tauranga and the sub-region are looking for solutions to congestion and sprawl, and many people are extremely concerned about a variety of issues including climate change, cost of living, housing and what high and medium density will mean for them. However, it is unlikely that all but a few will share their views through this submission process. It is simply too big an ask for people who are already stretched time-wise and/or who feel that it is a lot of effort to (a) get their heads around what is proposed; and (b) put in a submission; when it probably won't make a difference to the outcome (because this is what people have experienced in the past).

For the Smartgrowth consultation process to be effective there needs to be more involvement at community level – and as the Strategy notes, there are different needs within different communities.

I know that in the past, Smartgrowth had forums focused on various sectors, including social and environmental. These forums could be re-established, or take on a new form. There are experts in both the social and sustainability sectors who could offer valuable strategic analysis and input as the Strategy continues to develop and a Housing System Plan is formulated. Facilitating this input would require adequate funding as these sectors currently have limited capacity because of funding constraints. These sectors are just as important as the economic sector, as we grapple with climate change, social problems and the growing inequality in society, all of which have a huge impact on the communities in Tauranga and the sub-region.

### Growth vs sustainability

There is currently a growth mindset in the Bay. Local governments have been told they must provide for growth, and Tauranga is the fastest growing city in New Zealand.

However, there's a difference between providing for the natural growth of a region and deliberately attracting growth.

Priority One's states on their website “Our role is to grow a **sustainable economy** that improves productivity and delivers prosperity to local people and communities”.

It is clear that growth is causing huge problems in our region because we can't afford to keep up with it. Tauranga's debt has increased by 79% in the last 3 years (to June this year) and rates have increased by an average of 53%. Such increases are not sustainable. Part of being a liveable city is being able to afford to live there in the first place.

Another consideration is the extent to which we are limited by resources. My understanding is that the water supply will put a cap on growth. (I see water availability is noted as a factor to be taken into account on page 28 but there is no analysis of what this might mean in specific terms.)

I would like to see the mindset change from growth to sustainability and optimisation. I would like us to concentrate on optimising what we already have here, and in so doing, look after our existing communities. Yes, we have to provide for growth but let's not make it worse than it has to be. The more we can slow down growth, the more chance we have of being more sustainable, of shoring up our resilience and reaping the benefits listed in the Strategy at page 15.

### Main sources of growth

It is useful to have the summary on pages 21 and 22 of the Strategy about the ageing population and increase in young Maori. This is also shown by this graph:

<https://figure.nz/chart/FyfHKfmyQB67AWR0-0t9ypq4LIPm9upiO>

In addition to providing for more elderly people and young Maori in our communities, it is becoming clear that we need to provide for an immigrant workforce.

### Housing

The demographics and rising cost of living are all pointing towards more need for low-cost homes and secure long term rentals.

The Strategy proposes intensification in certain areas, and greenfields development in others - notably the western corridor.

In terms of "homes for everyone", there is an acknowledgement at page 112 of the Strategy that intensification and some new greenfields will address the housing shortfall, but under the current market dynamics, it is unlikely to address housing affordability. It also notes there are limited examples and products for "alternative tenures", such as build-to-rent, co-housing, or shared ownership. Especially given Kainga Ora's involvement in the sub-region and its purchase of land in the western corridor and along the central corridor, the continuing lack of affordable homes is extremely concerning. I understand that there is no prospect of affordable homes in the western corridor because of the cost of the land and civil works, and that along the central corridor there are geotech issues which prevent the construction of high-rise.

I endorse a "paradigm shift" and "using all the tools available" to ensure future development provides the range of housing options the community needs (page 111).

My thoughts on this issue include the following:

- I understand there is about \$50M that will come from sale of the Pitau Road Village, and that this could be used for elder housing straight away. The Abbeyfield development in Katikati seems to be an excellent example of how community building can be at the heart of a development and suited to an ageing population who cannot afford home ownership.

- I understand that purpose-built long-term rental accommodation is common in Europe and that there is interest in Europe in investing in this kind of accommodation in NZ.
- As homelessness increases and options to relocate decrease, we could face the same kind of issues as Queensland, where people are living in public parks because there is nowhere else for them to go. We already have a van which is not being moved on from Memorial Park, presumably for this same reason. Auckland's city mission seems a great initiative.
- In regard to an immigrant workforce, I don't know if there are projections about numbers or the sectors in which they will be employed, but I gather there will be a significant number of kiwifruit workers. I have read TPEDG's submission and the fact that there is already demand for worker accommodation in the Eastern Corridor. This will presumably increase with an influx of immigrant workers. I support TPEDG's calls for building homes in the east as a priority. It makes sense to give this growth area priority over Tauriko. It would align with the Strategy (refer page 95, no. 3 – "accommodation for the rural workforce, including seasonal workers, is provided close to jobs and with good access to essential services."). As is pointed out in the TPEDG's submission, not only do communities like Te Puke, Pongakawa, Paengaroa and Maketu already have essential services, they have their own community identity and existing social infrastructure and networks. Homes will cost less than homes in Tauriko, meet the ideal of "Live Work Play", plus they have the advantage of being in close proximity to the Eastern link roading route (which was an extremely expensive piece of roading!). As an aside, an "Eastern city" has been mentioned. This could be a longer term goal.

### Intensification vs greenfields

I am in favour of intensification over sprawl because of carbon reduction and environmental factors.

The Strategy focuses on "growth being planned in a coordinated way and future development being centred around identified priority development areas". It's stated aim is to "avoid developing 'out' through new greenfield land unless this is in a planned growth area, opting instead for developing 'up' through intensification, with townhouses or apartments." My question is, how will our local Councils achieve quality intensification if developers can opt for more profitable greenfields projects?

I think the time has come for strong urban planning and incentives to counteract the developer led growth we've seen up until now. It's natural that developers will go where they can make the most profit most easily, so it's a matter of figuring out how to work with that. It's not new; – as you will be aware there are plenty of examples overseas where central and local government have been very strict on urban planning to ensure places are liveable, have sufficient greenspace, foster community, etc. The liveability aspirations are well described in the Strategy (eg at page 45 – "Liveability and placemaking", and at number 2 on page 83 which states – "Population growth and intensification increases demand for recreation facilities, open spaces, green space and parks").

It seems that under the new National government, there may be more flexibility around the location of multi-storey densification – refer

[https://www.national.org.nz/nationals\\_going\\_for\\_housing\\_growth\\_plan](https://www.national.org.nz/nationals_going_for_housing_growth_plan).

This should assist in making decisions tailored to the wishes and needs of particular communities. The Mount is an example of where 4 – 8 apartment blocks seem logical but there is a strong wish to preserve the special character of the Mount (to maintain its "vibrant urban form" to borrow the phrase from page 17 of the Strategy), keep congestion under control, acknowledge the realities of

the existing infrastructure (eg 3 waters), recognise the linkages between Mauao and our moana and, with reference to page 81, preserve the backdrop that Mauao provides.

The type of intensification selected for different areas is important. I and many others, much prefer the two or three storey townhouse-type homes that have popped up in Christchurch to 4 – 8 storey apartment blocks. This seems to be the “sweet spot”.

Back to the point about incentivising developers to choose intensification projects. One way of limiting sprawl and making intensification projects more viable is to turn off the tap on greenfields growth, or at least reduce it to a trickle (so maybe 3,000 homes in Tauriko which is the growth that Waka Kotahi is confident the current infrastructure will handle). Given that TCC’s commissioned report concludes that the Reasonably Expected Realised number of dwellings for intensification (taking into account the commercial realities) is 19,000, deferring greenfields development to encourage intensification seems a feasible proposition.

## Transport

There are questions around what is not addressed in the Strategy. When I was involved in a survey about UFTI a few years ago, most people we asked about transport networks said they favoured rail. Although this has been considered too expensive in the past, with the growing population of sub-region and the rapid development of technology and AI, there may be ideas that are worth investigating (certainly this is the approach that Wayne Brown is taking). **I would have thought we should be at least be planning for an interconnected rapid transit system** which would entail identifying and securing land for that purpose before the land gets sold/built out. To give an example, I understand that a rail service from Omokoroa could have been a good option but the land which would have been suitable for a railway station in Omokoroa has recently been sold. Park n Rides are to form part of the network but I can only see them mentioned in the Strategy at Domain Road, Wairakei, Omokoroa and Te Puna. We need to provide for others which are closer in, eg at Baypark. Similarly, there could be more on-demand PT trials, including Maungatapu (where I live!) which is ideally suited to the concept because of the long peninsula.

I am in support of the aspirations of the Strategy, particularly those I have listed below\* - my comments are in italics. However, I’m not at all clear about the public transport plan and how the aspirations will translate into reality. UFTI/Connected Centres does not seem to fit with the Strategy’s aspirations.

At the moment, the premise is that creating a “spine” along Cameron Road from the Western Corridor is the most effective way of transporting people to where they need to go, that it will increase the use of public transport and reduce carbon emissions.

According to the Strategy, 70% of jobs may be along that corridor. However, getting along the corridor will be impeded by 28 sets of traffic lights so would commuters not just take Takitimu Drive instead? And of course work is not the only reason people travel around town or to the Mount or outer suburbs. We have a good indication from Waka Kotahi data (using the commuter.waka.app) about the extent to which people move across and around the city, for example to:

- medical appointments. The hospital in particular shows up as a major destination. I see that there is a bus stop planned for there but more thinking may be required about routes and also options for the mobility impaired. There are a number of other medical facilities that also have a high visitation rate (eg Tauranga Eyecare). As noted on page 129, healthcare is an important component of meeting people’s needs across all corridors in the sub-region;

- the airport;
- sports facilities (which ironically have become more centralised over recent years rather than community-based although I see on page 164 there is a goal to “increase the capacity of existing sports fields and major neighbourhood play spaces throughout Tauranga City”).

Often there is no feasible way of getting to these destinations by public transport. Even if it's possible to change buses and get to a destination, realistically, people are not going to do that, especially if they can get there more conveniently by car (which forms the basis for the second aspiration below).

#### **\*Aspirations from Strategy**

- Provide frequent and reliable public transport and safe, connected cycle facilities within and between centres, supporting intensification areas and higher densities. (page 19)
- Focus on delivering frequent and reliable services on core corridors in tandem with targeted interventions to make public transport journeys competitive with travel by private vehicle. (page 116) *I think this is key!*
- Future proof the public transport system for a longer-term transition from frequent and reliable services to rapid transit. (page 116) *Does this include identifying corridors and purchasing land? Where is the rapid transit plan?*
- Implement recommendations from the Bus Decarbonisation Feasibility Study in terms of transitioning the fleet to zero emission buses. (page 116)
- Explore the potential for new modes and service delivery models including on demand public transport, passenger rail and ferries, park and ride. (page 116) *Are you gathering data on what people would actually use and in what circumstances? Having an effective process for this is critical, and we cannot keep delaying action on these critical components.*
- An on-demand public transport trial on page 167 (Greerton, Tauriko, Pyes Pā)

I think it would be beneficial to:

- revisit UFTI and Connected Centres;
- use evidence-based analysis to evaluate the extent to which the plans match the aspirations in the Smartgrowth Strategy;
- explain to the public why the possibility of rail hasn't been included (or better still, provide for rail as part of the network);
- look at more innovative ideas around public transport;
- explain how all the pieces are to fit together (eg bus services, park n rides, on demand transport, services for the mobility impaired, services to frequently visited places) etc.

The outcome should be the development of a low carbon rapid transit network.

I understand that funding is a huge issue. Perhaps with a change in Government, local authorities will have more say about what it is they need funding for, rather than having to find projects to fit the funding on offer. While this might seem idealistic, we are seeing Auckland push back on central government, and demand that it make its own decisions about what it needs.

### **Air pollution (refer transformational change 8.5)**



There is also the serious issue of pollution which needs to be addressed, namely the air shed at the Mount. I would have expected options in the Strategy to move the polluting industry away from schools, marae and residences.

## Conclusion

I appreciate all the work and thinking that's gone into the Smartgrowth Strategy. I agree with pretty much all the aspirations in the Strategy. I just don't think the current plans live up to the aspirations, particularly in terms of low carbon infrastructure, and the goal of "live, work, play" and 15 -20 minute neighbourhoods.

It will be up to Councils, territorial authorities and central government to implement the Strategy. I think the Councils are in a tough position because central government is dictating that they provide for growth but not investing sufficiently in robust long-term low carbon solutions and allowing local government to determine what they need. Meanwhile ratepayers cannot sustain the kind of ratehikes that are becoming the norm.

I may be making a supplementary submission once more information is received in early November.

Thank you

Julie Andrews  
412 Maungatapu Road  
Tauranga 3112  
0274272373

sub 76



**TO:** SmartGrowth Bay of Plenty  
[REDACTED]

**DATE:** 20 October 2023

**SUBMISSION ON:** SmartGrowth Strategy 2023

**FROM:** New Zealand Kiwifruit Growers Inc (NZKGI)

**THIS SUBMISSION IS SUPPORTED  
BY THE FOLLOWING:**

- Māori Kiwifruit Growers Inc (MKGI)



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New Zealand Kiwifruit Growers Incorporated

For over a quarter of a century New Zealand Kiwifruit Growers Inc (NZKGI) has advocated on behalf of New Zealand kiwifruit growers and does this by representing the commercial and political interests of kiwifruit growers in industry and government decision making. While this submission is on behalf of New Zealand kiwifruit growers, NZKGI has also encouraged growers to make their own submission.

Zespri Limited

Zespri is the world’s largest marketer of kiwifruit, accounting for about one third of global kiwifruit trade, with a premium high-value proposition. Zespri is 100 percent owned by current and former kiwifruit growers and has a global team of more than 800 based in Mount Maunganui and throughout Asia, Europe and the Americas. Zespri’s purpose is to help people, communities and the environment around the world thrive through the goodness of kiwifruit, and Zespri works with 2,843 growers in New Zealand and 1,500 growers offshore to provide consumers with fresh, healthy and great-tasting Kiwifruit. In 2021/22, Zespri supplied over 200 million trays of kiwifruit to consumers in more than 50 markets and recorded global operating revenue of NZ\$4.47 billion.

Māori Kiwifruit Growers Incorporated

Māori Kiwifruit Growers Incorporated (MKGI) is an organisation representing the interests of Māori kiwifruit growers in New Zealand. Established to support and advocate for Māori growers in the kiwifruit industry, MKGI works to ensure that their members have a voice in the decision-making process and are well-informed about industry developments.

1.The Kiwifruit Industry

The Bay of Plenty region stands as a testament to the enduring success of New Zealand's kiwifruit industry. Representing a significant portion of the national economy and having a rich history intertwined with the growth and development of kiwifruit, the region is poised for continued growth, underscored by sustainable practices and socio-economic advancement.

Commercial kiwifruit cultivation in New Zealand dates back to the 1930s, with exports commencing in the 1950s. The establishment of the New Zealand Kiwifruit Marketing Board, later renamed Zespri in 2000, became instrumental in managing and marketing kiwifruit exports, excluding Australia.

The Bay of Plenty has long been the centre of New Zealand’s kiwifruit growing industry, and average expenditure in the region accounted for 79 percent of national grower expenditure. The average annual \$1.59 billion of direct expenditure by growers in the Bay of Plenty over the past three seasons resulted in a \$2.96 billion total average annual expenditure impact within the region.

As the below table shows, this expenditure directly contributed \$692 million to the Bay of Plenty’s GDP and supported 20,805 FTEs. Direct employment in the Bay of Plenty was 82 percent of total national direct employment generated by kiwifruit growing. When indirect and induced impacts are included, the total impact of kiwifruit growing in the Bay of Plenty region contributed \$1.65 billion to GDP and supported 37,323 FTEs.

Table 3.1 Bay of Plenty kiwifruit growers’ average annual regional impact 2020/21 - 2022/23

	Direct	Indirect	Induced	Total
Expenditure (\$m)	1,588.9	801.2	569.3	2,959.3
GDP (\$m)	692.3	587.1	365.9	1,645.3
Employment (FTEs)	20,805	11,174	5,344	37,323

Source: BERL analysis

In 2022/23, the Bay of Plenty received over \$1.7 billion in export earnings from the kiwifruit industry alone. Given the current demand, this value is expected to double by 2030. Kiwifruit provides one of the highest per-hectare returns in New Zealand’s primary sector with exporting totals more than 80% of the Tauranga port’s operation. The aforementioned, not only emphasises the economic magnitude of the industry but also its role in regional employment, providing avenues for both permanent and seasonal work, including many under the Recognised Seasonal Employer (RSE) scheme.

We note that a focus of the SmartGrowth Strategy is to ensure a range of employment opportunities (page 5) and that average household incomes in the sub-region are below the national average (page 21). The kiwifruit industry provides a range of employment opportunities associated with growing, harvesting, processing distribution and marketing. These employment opportunities cover the full income range.

At the orchard level, growers are proud of the economic contribution that they make to the region through direct spending and employment. The average picking wage across the industry for 2023 was \$28.35, which is well above the minimum wage of \$22.70. The salary range for orchard managers is \$55,000 to \$150,000 per year. At the upper end of the scale, for the year ended 31 March 2023, 200 employees at Zespri had total remunerations and benefits exceeding \$100,000 (the highest of which was in the \$800,000 to \$809,999 range). The industry relies on technical support at all levels and staff employed in those roles are remunerated accordingly.

Māori growers play a pivotal role in this industry, with 87% based in the Bay of Plenty. In 2021 alone, their contribution reached 15.7 million trays, translating to around \$165 million in income for Māori growers.

The next five years herald an anticipated growth of 30% in the kiwifruit industry within the Bay of Plenty region. This projection underscores the potential for socio-economic advancement and increased employment opportunities. NZKGI appreciates the opportunity to provide feedback on the 2023 SmartGrowth Strategy on behalf growers in the region.

## 2. Rural Accommodation

The RSE scheme in New Zealand is designed to address seasonal labour shortages in the horticulture and viticulture sectors. It permits employers to recruit workers, primarily from specific Pacific nations, to fill temporary roles in these industries when there aren't enough New Zealand workers available.

With the global appetite for kiwifruit on the rise, the industry is gearing up for a period of expansive growth. RSE workers are essential to this industry, especially during the high-demand seasons. Their involvement is pivotal for the industry to uphold its output and fulfil international demands. The RSE scheme allows 19,000 places for overseas workers to do seasonal work in New Zealand each year. Within 12 months of the year, around 3,500 to 4,500 RSE workers operate in the BOP for varying durations, and this number is only anticipated to rise. Yet, to capitalise on the continued growth of our industry necessitates addressing a pressing concern: providing appropriate accommodation for these workers.

The Bay of Plenty region faces a notable deficit in housing for its seasonal workforce. This shortage becomes even more pronounced in the smaller towns of Western Bay of Plenty, the hubs of numerous orchards and packing centres. Consequently, many employers have ventured into constructing new or adapting existing structures to ensure their workers are housed close to their places of work. In a 2022 survey, employers reported having 4,451 beds designated for seasonal workers, with a plan to bolster this number to 6,445 by 2027.

There are perceptions, especially in real estate squeezed Tauranga, that seasonal workers take homes from local families. In reality, less than 5% of the accommodation provided in the Bay of Plenty is in residential housing with most workers living in purpose-built accommodation: converted buildings, on orchards and dormitories with shared facilities.

For employers to participate in the RSE scheme, they are obliged to source housing for their RSE staff. Given the scarcity of available accommodation options, numerous employers find themselves investing in specialised facilities, at substantial costs. With costs around \$60,000 NZD per bed and a two-year timeline due to resource consents and permits, this solution is becoming increasingly cost-prohibitive and excessively lengthy in its completion time.

In a recent case highlighting housing challenges for RSE workers in the region, an employer participating in a joint Agreement to Recruit (ATR) confronted disparities in accommodation charges. While capped at \$110/week for housing RSE workers in the 2023 season, another party in the same ATR had an approved rate of \$145/week for the identical accommodations. This uneven approach has caused significant financial strain on the employer, leading to a yearly loss of \$60,000. This restricts their capacity to improve the necessary accommodation requirements for workers, resulting in them having to desperately reach out to the wider industry to help them source housing solutions

for his RSEs in the 2024 season. This situation accentuates the urgent need for consistent and affordable housing solutions for RSE workers.

Current Challenges in Securing Adequate Accommodation for RSE Workers:

1. **High Construction Costs:** Establishing purpose-built RSE accommodations often involves significant capital investment. The intricacies of designing facilities tailored for RSE workers, combined with the rising costs of materials and labour, make this a costly undertaking for employers.
2. **Shift in Facility Use:** The recent pandemic saw facilities, such as the ART House in the BOP, pivot from serving RSE workers and backpackers to addressing the urgent need for emergency housing. While this move was crucial for the community at the time, it inadvertently shrunk the housing pool for seasonal workers.
3. **Legislative Barriers:** The central RSE policy, while emphasising the necessity for suitable housing, faces obstacles at the local level. Land use regulations, particularly in rural areas, are often at odds with central government objectives. This inconsistency between national aims and local legislative restrictions becomes a huge barrier to the industry and its growth.
4. **Residential Housing:** The inability to buy a residential house after 26 September 2019 to accommodate RSE workers, even if employers intend to significantly modify it, eliminates a potential solution where older or less expensive homes could be purchased and renovated to meet the needs of the workers.

The SmartGrowth strategy alludes to the importance of securing accommodation for seasonal workers near their job locations and essential services (page 95). However, specifics on how this will be realised are lacking. It is important that the strategy not only recognises the need for housing these workers but also the broader implications for their well-being, productivity, and the overall prosperity of the region.

We appreciate that preserving highly productive land is vital but coupled with the current restrictions on RSEs living in residential homes and the potential community isolation for RSE's due to on-orchard housing, it raises the questions about what solutions and opportunities are available? As the scheme is set to expand, this complex issue necessitates engagement with industry stakeholders, ensuring that the voices of RSE workers are also heard. NZKGI is ready to actively participate in these important discussions.

### 3. Social Infrastructure and Wellbeing

#### **Enhancing Community Cohesion: Fostering Engagement and Cultural Competency with RSE Workers in the BOP Region**

The BOP region, thriving in its diverse culture, values the contribution of every community member. Within this framework, the RSE workers hold a pivotal place. Their integration and active community engagement play a key role in forging a cohesive, welcoming, and prosperous community. Over the course of 12 months, there are approximately 3500 to 4500 RSE workers that work for differing lengths of time in the BOP, with this only expected to grow.

RSE workers are not mere transient contributors; they are an integral part of our local ecosystem. When they earn, they also spend within the BOP, circulating resources and sustaining local businesses.

The complete integration of RSE workers into the community is still a work in progress. By nurturing deeper connections between these workers and the broader community, we can cultivate a greater sense of belonging and create a more harmonious, inclusive environment for all.

There is a growing concern regarding certain misperceptions surrounding RSE workers. For instance, isolated incidents, such as Council complaints about RSE workers allegedly spitting outside Kava Bars in Te Puke and the misconception that RSE workers are taking New Zealanders jobs, underscore the urgency for increased community integration, education, and engagement. Such instances can be mitigated through informed communication, fostering mutual respect, and understanding among community members.

Some RSE employers have taken commendable steps towards promoting community engagement. A testament to this is the rugby match organised by Pacific Island Rugby between RSE workers employed by kiwifruit packhouses, EastPack and Seeka in August of this year in Mount Maunganui. The event was not only a sporting spectacle but also a testament to the power of community bonding.

The well-being of RSE workers—both mental and physical—needs our attention and support during their tenure in the region. Embracing them with local customs like a traditional pōwhiri by the local iwi upon their arrival, facilitating their participation in church sermons, supporting their national Independence Day celebrations and promoting sports and activities are not mere gestures but essential steps towards holistic community integration. It has been noted that practicing faith is hugely important for RSE workers' as it not only supports their mental well-being but also provides them with guidance and purpose while here in New Zealand.

The SmartGrowth Strategy, while focusing on the broader community development, needs to include the integration and well-being of RSE workers, understanding their role in the BOP regions community.

Key areas to focus on should include:

1. **Community Integration and Cultural Understanding:** Address misperceptions and incidents that may arise due to cultural misunderstandings, such as the concerns raised over RSE workers' behaviour outside Kava Bars in Te Puke. Strategies could involve educational programs, community dialogues, and cultural exchange initiatives that enhance mutual respect and understanding.
2. **Engagement and Well-being Initiatives:** Expand on existing employer-led engagement efforts, like the rugby match organised by Pacific Island Rugby, to include broader, structured community programs. These should focus on the well-being of RSE workers, incorporating mental and physical health support, and offering a range of social and recreational activities.
3. **Customs and Celebrations Inclusion:** Introduce RSE workers to local customs and involve them in regional and national festivities, thereby fostering a sense of belonging. Initiatives could include traditional pōwhiri welcomes, involvement in local church services, celebration of their national Independence Days, and more.

4. **Collaboration with Existing Programs:** While programs like "Welcoming Communities" led by Immigration NZ exist for migrants, there's a need to either expand these to include RSE workers or create new, tailored initiatives. Collaboration between local governments, businesses, and community groups is essential for the success of such programs.

#### 4. Climate Change

Plans for future housing need to consider many things including tāngata whenua perspectives, potential effects on Te Taiao (the environment), proximity to work, transport and infrastructure, natural hazards and areas that may be susceptible to climate change.

The climate change maps that are shown in the SmartGrowth Strategy are confusing. Maps 2a and 4 appear to show that the whole of Matakana Island is subject to coastal inundation. Figure 17, which is a snapshot of climate change risks to the Western Bay of Plenty, appears to show something different for Matakana Island but the legend is confusing. Figure 17 shows considerable river and surface flooding in the Te Puke and Pukehina areas, which are important areas for kiwifruit growing. The area of flooding in Figure 17 appears different to that shown in Map 4. Presumably the identified growth areas are not affected by flooding but the differences in the maps make this unclear.

NZKGI wishes to better understand where the areas at risk from climate change are located because this is of interest to growers. NZKGI requested from BOPRC the shapefiles that show the areas at risk from coastal and inner harbour erosion and inundation. In response, we were advised that new information is currently being reviewed and formatted correctly before being made publicly available, which will hopefully be by the end of this year.

We understand that the WBOPDC Mapi maps contain the climate change related information at a better scale. Our preference, however, is to wait until the updated maps are available and to review the information then. Presumably the SmartGrowth team will do the same and will make any necessary changes as a result of the new information.

NZKGI has an interest in climate change for several reasons. Many kiwifruit orchards and the associated roads and infrastructure that the industry relies on are located close to the coast and rivers and in some cases in low lying areas, so it is important to understand how they may be affected. In addition, growers are already seeing climate change effects on their crops with decreased winter chilling hours, the devastating effects of recent cyclones (which affected not only the orchards but the roads and infrastructure that support them), flooding and unusual frost events.

Climate change will result in significant challenges for growers in the future, and as part of the adaptation required for a growing industry, growers will increasingly start looking for Highly Productive Land that is less susceptible to the effects of climate change. They will likely favour areas where the land and associated infrastructure is less susceptible to erosion and inundation, and where they can access water for irrigation and to protect their vines from frost. Access to labour will also be an important consideration. Other sectors in the agriculture/horticulture industry will likely also be looking for similar land. It will be important to protect Highly Productive Land so that it remains available for food production.

We note that the SmartGrowth Strategy seeks to provide accommodation for a growing population, but we question whether the Strategy has appropriately considered the need for land to deal with the likely requirement for managed retreat. Presumably some houses that will be affected by coastal and river erosion and inundation will be able to be picked up and relocated elsewhere, and where relocation is not an option, the people who reside in those houses will still need somewhere to live.



The SmartGrowth Strategy is currently silent on this, but consideration of the need for managed retreat, and where people will retreat to, will become an important consideration for the future.

Map 3 is already showing the potential for future growth on areas of Highly Productive Land. We submit that where possible, Highly Productive Land should be protected for appropriate land use such as kiwifruit growing, and we urge the Committee to keep this in mind as they consider the challenges ahead and the need to identify future land areas for housing.

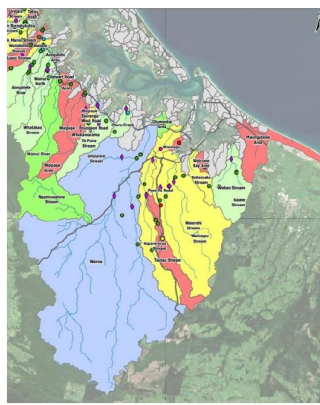
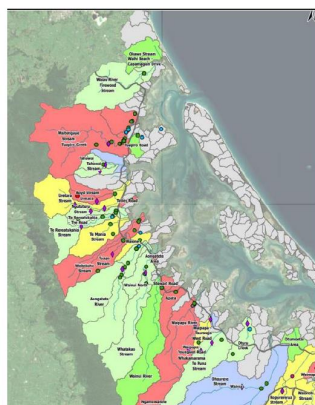
## 5. Water

Many kiwifruit growers in the sub-region currently rely on an adequate supply of water for irrigation and frost protection. The demand for water is likely to increase with climate change.

NZKGI has recently provided comments on Bay of Plenty Regional Council's Freshwater Management Unit (FMU) stories. The proposed minimum flows in rivers and streams will create new challenges in terms of reliability of water supply when river levels fall during dry weather. Water storage and water efficiency measures will become more important for everyone to achieve climate change resilience. Some growers have already switched from taking surface water to taking groundwater to ensure a more reliable supply and others are likely to follow.

We note that in some areas within the region, there is already allocation pressure for surface water and groundwater. The figures below are taken from a recent presentation by BOPRC in Katikati. The first figure summarises the allocation status for surface water and the second figure illustrates the revised allocation status for groundwater.

### Surface water: Draft allocation status

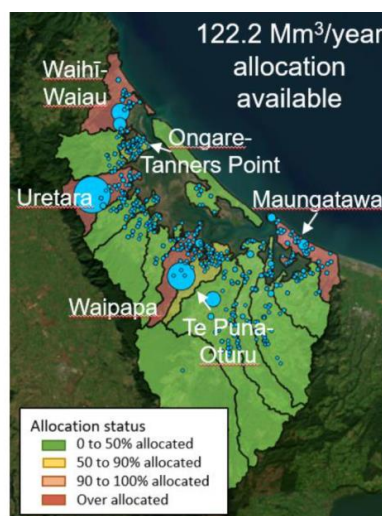


#### Over allocated

- Tuapiro
- Boyd
- Waitakohe
- Kopurererua
- Tautau

## Revised draft allocation status

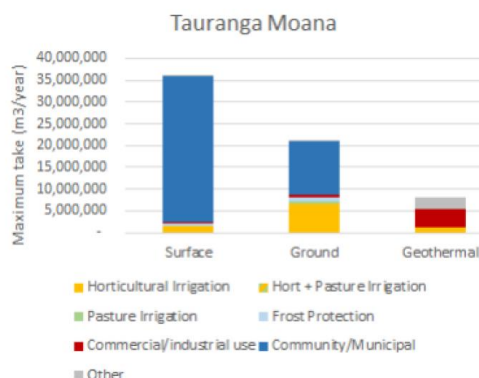
- The proposed management of the groundwater system is of a single layer (no vertical separation).
- Total allocation available for region now estimated to be 122.2 Mm<sup>3</sup>/year.
- Based on updated approach.
- Areas of over-allocation include Waihi - Waiau, Uretara-Te Rereatukahia, Waipapa, and Maungatawa.
- Areas of between 50% and 90% allocation include Ongare-Tanners Point and Te Puna-Oturu



Within the Tauranga Moana FMU, the take volume is dominated by municipal water takes as shown below:

## Water Quantity

- 325 groundwater take consents
- 92 surface water take consents
- 131 warm groundwater take consents
- Volume dominated by municipal water takes
- Important horticultural, hydro electric and commercial uses
- 200+ consents water take consents expire 2026



The infrastructure needed to support development in the sub-region, including the need for new bores to cater for expected growth is discussed in Appendix 1 of the Smartgrowth Strategy. It is unclear whether the surface water and groundwater allocation maps produced by BOPRC currently provide for these new water takes. In addition, it is unclear whether the long-term water needs associated with new future areas of housing and industrial land are included in the allocation maps.

If they are not included, then existing kiwifruit growers may find that their currently authorised water takes will be affected at some time in the future due to the increased allocation pressure that will be caused by the need for water for community/municipal use. Growers will need to adapt by, for example, implementing a water storage solution or seeking a new water supply. This will require some lead time to plan and budget for any necessary changes. In addition, growers who wish to develop new orchards will be seeking clarity around their water supply before investing into a new venture. They will likely call BOPRC for this information and will assume that the information is accurate for the foreseeable future.

The SmartGrowth Strategy discusses the need to improve water efficiency to deliver a climate-resilient environment but there is no detail on how this will be achieved. Encouraging homeowners to build tanks and store water when it is available so that it can be used on gardens during dry weather might be one way of taking the pressure off waterways during dry periods. The reuse of grey water for toilets might be another solution.

In summary we seek clarification as to whether water that is necessary for the new growth areas has been provided for in BOPRC's allocation maps. We also seek that water storage and water efficiency is at the forefront of the design of new housing.

## 6. Kiwifruit Orchard Locations

Map 11 shows land use areas including the land that is used for kiwifruit growing. The kiwifruit growing area is based on 2017 data and there has been significant expansion of the industry since then. While it may be considered that there is no need to update the map at this point in time, we note the significant reverse sensitivity issues that can arise when new housing developments are located close to kiwifruit orchards. These issues include complaints regarding agrichemical spraying and audible bird scaring devices.

It will be difficult for the potential for reverse sensitivity to be appropriately considered by the planners if they are looking at outdated maps of where the kiwifruit orchards are located. We encourage ground-truthing and the use of appropriate buffer zones to prevent future problems.

## 7. Quarries and the Demand for Aggregate

The SmartGrowth Strategy is silent on the future demand for aggregate and where this will be sourced from. Like many others in the sub-region, growers and postharvest facilities rely on good roads. They are essential to ensuring that the fruit can be efficiently transported for packing and shipping.

In our view, the demand for aggregate will likely increase for a number of reasons, firstly to support subdivisions and also to maintain roads that are likely to be affected by climate change. It may be that this has been considered elsewhere but this is not clear.

In our view, aggregate demand needs to be estimated and future quarries identified and ringfenced to ensure that it can be affordably supplied in the future. Building houses on these areas would effectively sterilise them.

**Colin Bond**  
Chief Executive  
NZKGI

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[www.sociallink.org.nz](http://www.sociallink.org.nz)

*SocialLink Western Bay of Plenty is a registered charity based at The Kollektive in 17<sup>th</sup> Avenue, Tauranga. It is the umbrella peak body for the social and community sector in the Western Bay of Plenty. Its vision is a resourced, skilled and cohesive for purpose sector enabling communities to flourish. Its purpose is to build the capability, confidence, sustainability and voice of community organisations in the Western Bay of Plenty.*

As an umbrella organisation, SocialLink is involved in supporting social service and community organisations doing their work, as well as advocating in various ways for social justice and equity of opportunity for all people living in the WBOP.

### **Submission on Smartgrowth Strategy 2023-2027**

SocialLink recognises that population growth will continue in the western Bay of Plenty and sensible long term plans are required to provide healthy affordable housing, work and income, education, recreation and leisure opportunities for all, safe and socially inclusive, vibrant communities, as well protection and enhancement of the natural environment.

We acknowledge the challenges set out in the Strategy that face the sub-region. We acknowledge housing intensification is required as well as a multi modal transport system.

We wish to focus in this submission on the needs of the substantial group of people in the western Bay of Plenty who will not have the wealth to own or rent housing of their choice. They will likely have limited financial means in general to have a secure and settled future.

They are therefore very dependent on their needs being met in the Smartgrowth Strategy.

We acknowledge there are many things that need to be taken into account in planning for the future. In this submission we want to concentrate on a few elements that we believe would contribute to a liveable region for all the people who live here.

#### **General points**

#### **‘Vision’ should be revised to reflect contemporary perspectives**

The current Smartgrowth vision is ‘Western Bay – a great place to live, learn, work and play.’ (pg 16). With respect, this does not present as a vision reflecting contemporary and likely future

aspirations. It seems outdated and bland. 'Great' for example, can be defined in a myriad of ways. It also focuses only on human expectations and activity, with no reference to how humans are part of the natural world, and that our activity impacts on the climate, nature, wildlife and the general environment to their and our detriment.

We acknowledge the strategy seeks to address the four Local Government Act wellbeings (environmental, social, cultural and economic). However we think the vision itself should be more in step with contemporary concerns such as sustainability, protection of our environment, equity, inclusiveness, and health. Visions are important, they underpin the heart of our thinking, feeling and action.

Below are some examples of what other regions' future plans include in their vision elements which we think are more on track:

- 'Liveable, safe, sustainable and healthy place.' (Greater Christchurch);
- Several phrases form the vision for the Future Proof Strategy for the Hamilton/Waikato area: *A diverse and vibrant city centre, thriving towns and rural communities, place of choice, variety of housing options, protection of natural environments, landscape and heritage, productive partnerships, sustainable infrastructure and resource use, responds to climate change urgently, building resilience and supporting the transition to low carbon economy* (Future Proof Strategy, Waikato)

It would be valuable to incorporate the values expressed by tāngata whenua on pg 61 of the Strategy into this region's vision. The values expressed are

**"Manaakitanga** – respect and care for others:

We build warm and affordable homes and communities for all socioeconomic backgrounds. We also are good ancestors who plan and make decisions for our mokopuna and future generations.

**Kaitiakitanga** – environmental responsibility and reciprocity:

We are dependent on the natural world for their well-being and survival and therefore have a responsibility to care for and protect the environment in return. We are good ancestors who leave the natural environment in a better state for our mokopuna and future generations. Environmental reciprocity involves moving away from an exploitative mindset and creating a more balanced relationship between human activity and nature to ensure the health and wellbeing of all."

These values will also resonate with many people who are tau iwi, 'reflecting the interconnectedness between people, place and space and recognising the need for a healthy environment for future growth that is responsive to the concerns and aspirations of tangata whenua.'

### Purpose of the Strategy

"This Strategy aims to provide the blueprint for delivering on a well-planned and well-functioning urban environment and wider sub-region." Pg 13

While we understand the Strategy sets high level direction, in some ways the Strategy may be overemphasising high level broad challenges in comparison to what can be done.

Many of its opportunities on page 40 are at a high level rhetorical statement – ‘encouraging’, ‘creating’ ‘enhancing’.

It would be helpful to have more practical ideas, detail and examples on what and how things can be achieved, which in turn could help lead and focus direction.

While the ‘how to’ options might be laid out in the Implementation Plan, we think some of the thinking about this would be helpful to lay out in the Strategy.

## 1. Housing Issues

### (Transformational Direction 1 Homes for Everyone, Chapter 7).

We acknowledge the concern and challenges around catering for people’s housing needs over the next few decades.

One of the Growth Directives states that ‘A range of housing types, tenures and price points is provided within all growth areas and Maori land.’

Housing will need to include well-designed and affordable accommodation for low income generations, accessible homes for people with disabilities, growth in multi-generational households and more options for single person households.

#### Housing options for older people

As noted in the Strategy, the older age group of over 65 years is going to be a considerable proportion of the population. They will be nearly one in three in Tauranga by 2030. However there is limited information in the Strategy on specific ideas taking into account and planning for this impending wave.

Many older people with personal options or wealth open to them will sell and buy or make arrangements with family in the available private housing market, irrespective of regional plans.

However to accommodate the financial, physical and lifestyle needs of older people who have limited options, we think the Smartgrowth Strategy needs to plan for the following types of housing throughout the western in each of the locations.

- Secure rental based accommodation for single older people living on superannuation only or with very limited savings. This is a significant group who are or will be at risk of homelessness. Abbeyfield is one housing model where a group of residents live independently and share meals prepared by a housekeeper, see <https://www.abbeyfield.co.nz/> Funding for these complexes is currently raised through grants, fundraising, mortgage and similar. One is already developing in Katikati. As part of the Smartgrowth Strategy there may be ways to support other Abbyfield developments through local structured support eg identifying and securing suitable land, funding and community housing trust partnerships.
- Other options along similar lines could be fostered and enabled through planning, house modification and other support. These include co-housing with shared common areas, where residents participate in daily tasks, social activity and joint decision-making. Options



to have the choice to live with similar age groups or live together with people of different ages could be catered for.

- Small stand or duplex houses/units with single or two bedrooms for rental or purchase (standalone, duplex, terraced, apartment options) as more older people seek to downsize.
- Housing/apartment complexes can be built to accommodate a diverse demographic groups as well as including gardens and local businesses within them.
- Support for turning houses into 'flatting arrangements' for older people such as doing modifications.
- Multi-generational options for extended families
- Retirement villages provided by private developers or community trust partnerships
- 'Rest home' facilities to provide care and support for people who are unable to remain living by themselves.
- Aged care and dementia care facilities – there will be an increasing need for these.
- Papakainga housing for kaumatua (including multi-generational housing).

We expect the Connected Centres will have a range of housing options and social infrastructure.

What is good well-designed housing for older people that meets environmental, access and social cohesion goals are also likely be good housing options for other groups, particularly for those with limited financial resources. Some of what is built for older people will be repurposed as the 'baby boom' generation tails away.

## 2. Provision and development of green space including public parks

Green space is identified in the Strategy as important for a range of solid reasons. However there is limited mention about specific objectives and activities.

We note that the transformation Goal **0.5 Restore and enhance ecosystems for future generations** is the only one referring to the natural environment. However it does not specifically refer to green space/parks.

**Recommendation: Plan for an urban public garden/botanical garden accessible by all ages and abilities.**

We suggest the Growth Directives include mention of development and retention of land so people have access to green space public parks with trees, gardens and nature, no matter their income, age or mobility level.

We believe it is important that the Strategy pushes for purchase or redeployment of land for a public park/botanical garden within the urban boundaries of Tauranga, as the largest regional city. A common feature of many cities is a large public park, often with a botanical garden that provides education and research efforts to help the local community with planting and gardening suitable in the local climate, and that are open to and accessible by all.

Tauranga is very poorly off for such urban parks, presumably due to lack of visionary planning by our previous city councils. It is difficult to understand why land was not been set aside for this purpose during the various iterations of council since the 1960s. While the western Bay of Plenty area does have several parks outside the city boundary such as McLaren Falls Park and TECT Park, these are some kilometres away and only accessible by vehicle.

(Other cities often have similar parks outside urban boundaries as well as their large urban garden park, so local authorities cannot use the existence of these two parks to say we have provided along the same lines as other cities).

Perhaps too much emphasis has been put on the harbour and beaches as people's recreational places. These areas will be less accessible to many people in terms of hot climate, sea rise and the proportion of the population in the older age group.

The Western Bay of Plenty is blessed with beautiful coast line, beaches, rivers and estuaries and opportunities for people to walk in native forests ('bush') such as in the Kaimai Mamakau ranges. However for many people such options are not what they will enjoy, or the sites are beyond their physical safety, mobility limits or they can't afford to get there.

On the other hand, a large urban public garden will be generally reachable to all through private vehicle, bus, cycling or walking.

Urban Tauranga does have large green areas such as Kopurererua Reserve and Carmichael's Reserve, with walking, cycling and wildlife and water management areas, cultural heritage areas and in the case of Carmichael's Reserve, a playground. However these reserves offer a different experience to green space public gardens.

Public gardens such as botanical gardens are developed in a way that means they are more accessible and useable to all age groups, from infants to the very elderly as well as people with different levels of mobility and ability. They generally have multi assets such as sweeping lawns, places where people can picnic or sit comfortably, paths, large trees, gardens, glass houses, water features, sculptures, playgrounds and so on.

The table below reveals that we have less hectares devoted to these types of large urban public gardens and parks than most other cities or large towns in New Zealand. Several smaller cities and towns in terms of population have larger public parks than Tauranga.

**Table: Examples of Public Gardens and Parks within New Zealand city boundaries with trees, grass areas, gardens, walks and passive recreation areas**

City	Estimated 2023 Population	Examples of Public Gardens and Parks
Tauranga	158,000	Yatton Park (7 hectares), Memorial Park (11 ha)
Hamilton	180,00	Hamilton Gardens (54 ha) , Hamilton Lake Domain (101 ha)
Dunedin	130,000	Dunedin Botanic Garden (33 ha) Town Belt (202 ha)
Invercargill	57,000	Queens Park (80 ha)
Palmerston North	90,000	Victoria Esplanade (26 ha)
New Plymouth	88,000	Pukekura Park and Brooklands (52 ha).
Oamaru	13,000	Oamaru Public Gardens (13 ha)
Timaru	27,000	Timaru Botanic Gardens (25 ha), Centennial Park (65h), Caroline Bay (34 ha)
Nelson	54,000	Botanical Reserve (12 ha), Queens Gardens (2 ha)
Whanganui	48,000	Rotokawau Virginia Lake (25 ha)
Queenstown	16,000	Queenstown Gardens (14ha)
Napier, Hastings, Havelock North	148,000	Napier Botanical Gardens (7 ha) Keirunga Gardens (17ha)
Rotorua	77,000	Government Gardens (20ha) Centennial Park (20 ha)



Tauranga city has many small reserves some of which fairly narrow and link one part of a suburb to another such as through The Lakes area or in Papamoa, but these are not particularly usable as green, treed and wide open space for people and their families to relax.

All citizens and residents should have access to such a space that a public park can provide and it should be of substantial size. Not only is the aesthetic pleasure and enjoyment of such spaces with family or whanau, there are many health and wellbeing benefits to people able to be surrounded by and relax in nature, in gardens, amongst trees. As the Strategy notes on pg 96, 'Access to nature has benefits for people living with mental illness. A UK study found that people who lived in neighbourhoods with more vegetation and birdlife were less depressed, anxious, and stressed.'

Access to such commons that public gardens provide will be particularly important when there is an emphasis in the built environment on intensification of dwellings, smaller sections and apartment living.

Our public gardens and parks were set aside by forbears for the benefit of all, in the knowledge that it would take many years for trees to grow to stature. We believe it is well past time Tauranga had such a development.

The Strategy notes there are pockets of deprivation and poverty, the most deprived areas being largely urban and close to the centre of Tauranga. They in particular will benefit from access to beautiful, treed public parks and gardens.

Public gardens are also a golden opportunity to educate and demonstrate to the public about plants, gardens and the natural. They would also enhance the experience of living in the WBOP for the wider population as well as for visitors to the region.

The current 85 ha Greeton Maarawaewae reserve/Tauranga Race Course area may be one option to develop. Unfortunately it appears to be one of the last remaining areas of land suitable for a public treed park within the urban area. Its contours mean it is relatively accessible however.

## 2. Further develop urban existing reserves, parks and esplanades

In terms of building more opportunity for green space development that meets the needs of a more urbanised population, we suggest the 50 year strategy could include reviewing existing ways small reserves and parks belonging to the local Councils are used. Could they be repurposed with community input to enhance community connectedness, natural space enhancement, biodiversity of insect and plant life for instance?

For example, Tauranga City Council's Reserve Management Plan<sup>1</sup> lists 292 reserves, parks and esplanades. Some of these have historical, cultural or natural significance. Others are quite small and perhaps could be developed into community gardens or allotment space still owned by Council but peppercorn rented to local residents.

The Strategy notes in terms of housing, connected living and that *"many purchasers are not demonstrating a strong desire to "downsize". They are not yet seeing the value of living smaller but*

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<sup>1</sup> Tauranga City Council (2019) Tauranga Reserve Management Plan (2019) Reserve Specific Information

sub 77

*closer to services...It is imperative to build climate resilient communities, however the western Bay as a community does not yet recognise the benefits of the "15-minute neighbourhood", over the "quarter acre paradise".*" (pg 112)

Provision of amenities such as quality public parks are likely to help enhance the benefits of living in more intensively developed urban communities.

These ideas may be seen as too minor or too detailed, but the point we are trying to make is there are a range of things we feel could be encouraged as part of a 30 to 50 year plan that give optimism and hope to make our local places friendly, socially inclusive and liveable and at the same time be sustainable and supportive of nature.

Thank you for the opportunity to make a submission.

We would like to make an oral submission.

Ngā mihi

Liz Stewart  
Policy analyst

  
SocialLink

20 October 2023

SmartGrowth Strategy  
c/- 306 Cameron Road  
Tauranga

Email: [REDACTED]

Attention: Andrew Turner

Dear Sir,

**Tauranga Moana Fumigant Action Group and Clear the Air – Submission on Draft SmartGrowth Strategy 2023**

Clear the Air (CTA) appreciates the opportunity to make this submission on the Draft SmartGrowth Strategy (2023).

**Introduction**

1. These submissions are on behalf of Tauranga Fumigant Action Group (TMFAG) and Clear the Air Charitable Trust (CTA) .
2. TMFAG was initially an informal community group developed in around 2014 to assist Port workers and local residents in regard to acceleration of use at the Port of Tauranga and within the Mount industrial zone of Methyl Bromide and other fumigants with known health and environmental effects.
3. Clear the Air Mount Maunganui (CTA) is a community based environmental charitable trust that TMFAG works closely with and supports. In 2020 CTA was established, to inform and provide updates and communication to the public about the local air contamination and pollutant problems, and advocate on their behalf with local Councils. It is CTA's philosophy that by equipping local citizens with evidence on air quality and its impact, this can empower those most affected to campaign for change.
4. TMFAG and Clear the Air membership and local support for its objectives for clean air for residents and workers in Mount Maunganui, is extensive – literally hundreds of residents and workers who live in Mount Maunganui are dedicated to ensuring that this Community's environment and its residents' health are protected from ongoing cumulative effects of

airborne pollution generated from Port activities or related Industrial activities.

5. Both CTA and TMFAG, all through volunteer members, work closely and support one another. We strongly support Ngaiterangi, Ngati Kuku and Whareroa Marae in their important Korero and cultural values that are shared and aligned with our own community values regarding these issues.
6. CTA and TMFAG have lobbied and advocated alongside Ngati Kuku and Ngaiterangi Central and Local Government agencies such as Worksafe, Hauora a Toi BOP / Te Toi Ora Health , Bay of Plenty Regional Council (BOPRC), Tauranga City Council (TCC), and industries such as Port of Tauranga seeking the issues related to methyl bromide, air quality and airborne contaminants from Mount Maunganui Port and industrial area affecting the Mount Maunganui residents and workers are properly addressed.

#### **Industrial Business Land Study**

7. The Draft SmartGrowth Strategy identifies the need for a further 300 -400 hectares of greenfield business land over the next 30 years and that technical investigations have identified a number of possible locations for future business land.
8. It is not clear whether any of these sites will be able to accommodate heavy industry that causes cumulative adverse effects, particularly on air quality.
9. While the intention that all industrial zones should be clean and green is a worthy aspiration, the reality is that all regions need to host industries that generate effects that are hard to manage to a low level of risk, without significant separation from sensitive land uses.
10. If provision for heavy industry in specific suitable locations is not made through SmartGrowth, there is no scope for long term relocation of existing heavy industry emitters where those activities are located in unsuitable locations affecting residential areas or sensitive areas such as Whareroa Marae.
11. New emitting industrial activities will also need to locate outside the region due to uncertainty of where in the region it is suitable to locate to, increasing costs and carbon emissions from transportation, and pushing pollutants unwittingly onto other host

communities.

**Existing Industrial Areas**

12. All industrial areas need to significantly lift their performance in managing environmental effects to reduce existing impacts on the environment and on the health of people to acceptable levels in or near residential urban or other sensitive activities/areas. All the SmartGrowth Partners need to commit to addressing this through compliance, integrated land use and natural resources management, as well through future plan changes and strategies.
13. There is a need to align zoning and plan provisions with the National Planning Standards and differentiate light medium and heavy industry zones. This work needs to be completed urgently. The review needs to involve the Bay of Plenty Regional Council to address integration between land use and the regional plan provisions for air and water quality, and should include collaboration with key stakeholders, such as CTA.

**Residential Intensification**

14. There is a very real risk that intensive residential development enabled by PC 33 will increase exposure of people to unacceptable health hazards associated with the polluted airshed at Mount Maunganui. This also affects Pillans Point and Mount Maunganui.

**Transformational Shifts**

15. We note the Transformation Shifts and consider that resolving Mount Maunganui Airshed pollution has to be a priority that is at least equal to those identified, because it addresses real human health risks.
16. We wish to be heard in support of our submission and intends to expand further on the matters raised above.

Yours faithfully

**Kate Barry-Piceno**  
Legal Counsel



20 October 2023

Ref: JR-22-006

SmartGrowth BOP

306 Cameron Road

TAURANGA

**SENT BY EMAIL**

Dear Sir/Madam

**SMARTGROWTH STRATEGY: FEEDBACK FROM UPPER OHAUITI LANDOWNER GROUP**

Landplay Limited has been working with a group of landowners on Upper Ohauiti Road, Neewood Lane and Rowe Road, Upper Ohauiti over the past two years to consider the potential of their land.

The Group has engaged with Western Bay of Plenty District Council (WBOPDC) regarding a potential reclassification of their land from Rural to Lifestyle as part of WBOPDC's next District Plan Review.

We have set out the background and reasoning in the attached document and Master Plan for consideration by SmartGrowth and with a view to being heard at the hearing in December and further development of the proposition.

Landplay Limited is a multi-disciplinary business providing land development solutions, master planning and project management services to landowners. We assist landowners with the sustainable development of their land and to identify its potential with a community-orientated approach in order to create living environments that enhance wellbeing and built outcomes which are novel, functional and affordable.

We look forward to engaging with SmartGrowth and WBOPDC through the SmartGrowth Engagement process and any subsequent District Plan review process on behalf of our clients to achieve a positive outcome for the community and more broadly, the Tauranga and Western Bay of Plenty Districts.

Thank you for your consideration of the attached submission.

Yours faithfully,

**Landplay Limited**

A handwritten signature in black ink, appearing to be "CS", written over a light blue horizontal line.

Carl Salmons  
Director

A handwritten signature in black ink, appearing to be "RC", written over a light blue horizontal line.

Rosana Carnachan  
Director

*Attachments: Submission, Upper Ohauiti Master Plan*



## Submission: SmartGrowth Strategy 2023 Consultation

Submission by: Landplay on behalf of Upper Ohauti Landowner Group

Dated: 20 October 2023

### Contacts:

Carl Salmons

Rosana Carnachan



## Executive Summary

The Upper Ohauti Landowner Group (Landowner Group) represents seven owners with landholdings comprising approximately 280 hectares located at Upper Ohauti Road, Rowe Road and Neewood Road.

The Landowner Group wishes to submit (in their collective and individual capacities) on the Draft SmartGrowth Strategy 2023 (SGS) and seek to be heard at the hearing in December 2023.

The Landowner Group has worked with Western Bay of Plenty District Council (WBOPDC) over a period of time regarding the prospect and merits of reclassifying the Upper Ohauti Area as a lifestyle zone, from the current rural zoning.

The character of the area has evolved from a predominantly rural environment to a significantly fragmented area subdivided into smaller lifestyle lots with a small number of orchards. The balance of the larger rural landholdings are marginally economic, if at all.

The Landowner Group submit that the SmartGrowth Strategy should consider as supplementary to the primary focus on urban intensification, provision for lifestyle zoning where it meets appropriate criteria, including SmartGrowth objectives. Effective structure planning would be a critical component of planning for lifestyle areas to ensure appropriate servicing, access, connectivity and provision for ecological enhancement.

## Background

Over the past two years, the Landowner Group has been engaging in various forms with WBOPDC.

Early conversations were had with Philip Martelli (formerly of WBOPDC) who expressed support in principle for a lifestyle area in Upper Ohauti as a succession to the Minden Lifestyle area (and now which is at capacity and subject to further work by Waka Kotahi on the Northern Link for any further growth/capacity).

In June 2022 we made, on behalf of the Landowners, a submission as part of the 'Have your Say' survey formally introducing the notion of a Lifestyle Zone change (from Rural) for the Upper Ohauti area and we will reiterate those reasons in this submission.



Together with members of the Landowner Group, we met with a number of planning and engineering team members at WBOPDC in March 2023. Following that, WBOPDC sought further feedback on the proposition from Tauranga City Council (TCC) and Bay of Plenty Regional Council (BOPRC). That feedback can be made available, but in summary the feedback did not highlight any significant reasons against progressing a zone change.

Most recently, a high-level Master Plan discussion document (Master Plan) has been prepared and is attached to this submission. The Landowner Group has also met with several elected Council representatives to provide information about the proposition and the associated work carried out to date.

### The Landowner Group

This submission is made on behalf of the following landowners with property located at, and in the vicinity of, Upper Ohauiti Road, Ohauiti:

Address	Owner	Legal description	RT number	Area
412C Upper Ohauiti Road, Ohauiti	TJ and GA Hunter Limited	Lot 12 DP 463581	740123	56.368ha
432 Upper Ohauiti Road, Ohauiti	Maryanne Ellen Washer	Lot 2 DP 438080	540550	9.25ha
479H Upper Ohauiti Road, Ohauiti	Chris Ernest Thompson	Lot 10 DP 422217	736309	34.11ha
539 Upper Ohauiti Road, Ohauiti	Laureen Margaret Morrison, Whakataki Howard Morrison, Fenton McFadden Trustee Company Limited	Lot 2 DP 561622	1000190	39.35ha
539A Upper Ohauiti Road, Ohauiti		Lot 1 DP 497322	734192	1.635ha
539B Upper Ohauiti Road, Ohauiti		Lot 4 DP497322	734195	4.023ha
		Lot 7 DP 497322	1000190	0.7127ha
				Total: 45.72ha
	Anthony Phillip Parkes, Melissa Helen Parkes	Lot 6 DP 496844	732290	40.607 ha 2.4ha
		Lot 5 DP 496844	732289	
				Total: 43ha
81 and 112 Neewood Road, Ohauiti	Douglas John Gollan, Mary Elizabeth Gollan,	Lot 2 DP 326891	109264	21.31ha
			109264	53.8265ha





	WFM Trustees Limited	Part Lot 2 DPS 2172		Total : 75.1365ha
508 Upper Ohauti Road, Ohauti	Arndas Limited, Eiram Trustee Limited (Clink)	Lot 2 DP 402951, Lot 1 DP 365451 and Lot 1 DP 380948	409711	16.5090ha
Total:				280.0935

Additional, subsequent support for the purposes of this submission and the proposition has been offered by the following landowners, and who are included as submitters.

547 Upper Ohauti Road, Ohauti	Karen Leigh Wallace	Part Lot 1 DPS 12378	SA9B/1252	2.3791ha
537A Upper Ohauti Road, Ohauti	David John Butler and Donella Jane Butler	Lot 2 DP 455584	586552	8431m <sup>2</sup>
537B Upper Ohauti Road, Ohauti	Bevin Ross Watkins and Michelle Faye Watkins	Lot 1 DP 516538	805415	10.4645ha

Together (and unless individually referred to), the landowners’ collective properties will be referred to as the “Submitters’ Land”. A Plan showing the Submitters’ Land is **attached** in the Master Plan.

Comprising approximately 290 hectares, the Submitters’ Land is located on either side of Upper Ohauti Road, including a property located adjacent to the TCC- WBOPDC boundary (for clarity, located in the Western Bay of Plenty area).

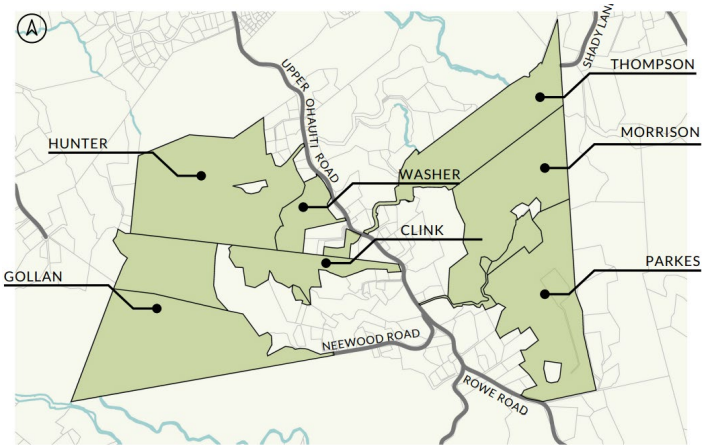


FIGURE ONE: MAP SHOWING LANDOWNER GROUP PROPERTIES



**Current zoning of Submitters' Land:** Rural (Western Bay of Plenty District)

**Use of land:** An operating dairy farm is located on the western side of Upper Ohauti Road (and on the TCC boundary) and in turn, on its southern boundary, an orchard (kiwifruit). The balance of the properties comprising the Submitters' Land are predominantly used for drystock/livestock grazing.

**Soil Type:** Predominantly classes 6 and 7 soils (LUC classification).

**The immediate area:** An aerial diagram of the area shows a proliferation of rural lifestyle properties in the vicinity of the Submitters' Land. Many of the properties are naturally concentrated along Upper Ohauti Road itself, with several branches of rural lifestyle properties spreading off either side of Upper Ohauti Road via rights of way or lanes.

There is a small area, in the vicinity of Neewood Road, used for orchards in the area south of the Submitters' Land, however the density of orchards is visibly lower than neighbouring areas for example, Pukemapu Road, Oropi. The lifestyle properties have been created over a number of years on a site-specific basis resulting in ad-hoc fragmentation of what was formerly generally farmland.

Substantial indigenous plantings have been carried out over the years by several of the Submitters concentrating on gullies, waterways (for example Kaitemako Stream) and wetlands providing enhanced conservation and amenity value.



**FIGURE TWO: AERIAL SHOWING PROLIFERATION OF LIFESTYLE PROPERTIES IN UPPER OHAUTI RURAL AREA  
(SOURCE: GRIP)**

The western properties owned by the members of the Landowners Group have previously been identified as within the Urban Limits (starting post-2021) in the Bay of Plenty Regional Policy Statement.

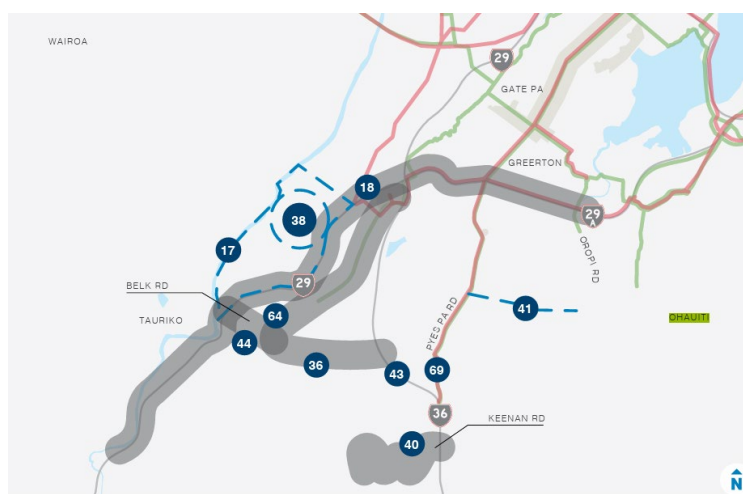
These properties, as part of the Upper Ohauti area (referred to as Ohauti South), have been recognised as within an Identified Urban Growth Area (SmartGrowth Strategy 2013) and also been



identified as a Future Greenfield UGA Area by SmartGrowth (SmartGrowth Development Trends 2021)<sup>1</sup>. One of the recommendations was for WBOPDC to progress investigations into the Upper Ohauti sub-precinct in line with the Regional Policy Statement and indicative provisions regarding the sequencing of growth areas.

The Welcome Bay Planning Study<sup>2</sup> was undertaken in 2020 to assess potential growth within Welcome Bay and Ohauti. The Study found accommodating medium and high growth housing scenarios in the Study Area are unfeasible except in the Upper Ohauti urban growth area. It considered a Welcome Bay west-east link to connect Poike and Welcome Bay Roads would be unfeasible and high risk, and vulnerable to natural hazards, therefore a fatal flaw to enabling more housing capacity.

It is also noted that the Transport System Plan in 2021 identified [the start of] a future Western Corridor Ring Route for planning/design to be conducted between 2021 to 2024, commencing from Pyes Pa Road (see number 41 on Figure Three below).



**FIGURE THREE: WESTERN GROWTH PACKAGE – WESTERN RING ROUTE (NUMBER 41) (SOURCE: TRANSPORT SYSTEM PLAN 2021)**

Notwithstanding the previous recognition of the western properties as future urban development areas (including the previous SmartGrowth strategy), it has not flowed through into the 2023 SmartGrowth Strategy. There are areas within the Submitters' Land which will lend themselves to a higher density than lifestyle, and this can be considered as part of future work, however the general Upper Ohauti Area arguably lends itself most suitably to lifestyle development. Some of these were recognised in the Section 32 Report for Proposed Change 4 (Tauriko West Urban Limits Change

<sup>1</sup> SmartGrowth Development Trends 2021

<sup>2</sup> Welcome Bay Planning Study 2020



2018).<sup>3</sup> If that is the case, then lifestyle zoning would not detrimentally impact prospects for future residential development.

**Topography:** The Submitters' Land is generally described as rolling to steep contours. There are areas of rolling country interspersed with gullies and steeper contours.

**Roading:** Upper Ohauti Road is a sealed, rural road generally with grass berms which winds its way up and over the hill country behind Welcome Bay.

**Servicing:** The properties are largely serviced by onsite water collection via roof or bore (supplied individually or supplied within subdivisions). Stormwater and wastewater for the dwellings are dealt with on site. All sites are supplied with power and telecommunications.

**Waterways:** The area is bounded by significant waterways draining into Tauranga harbour. To the west is Pukekonui Stream. Waimapu Stream is located further to the west and south of the Submitters' Land and Kaitemako Stream is located to the east.

### The case for Rural Residential provision in the SmartGrowth Strategy

There is comparatively little research available on lifestyle living in New Zealand. Lifestyle properties and associated demand have grown over time, typically as a response to the demand for houses.<sup>4</sup> Pearson et al in 2022 explored the reasons underlying demand for lifestyle properties in a Palmerston North context, describing a "tree change" phenomenon as a response to the Covid-19 restrictions and lockdowns and an increased move to work from home.<sup>5</sup> Demand for lifestyle living however has a popular choice for a much longer period of time. Unlike farming entities, lifestyle owners generally do not move for primarily financial purposes (i.e. to generate an income from the property), and are merely making a lifestyle choice.<sup>6</sup> A high proportion of owners have a good sense of environmental stewardship and have a desire to plant native species and protect their land from plant and weed pest invasion, community focused and protective of their place, as well as contributing at a small scale to local food production. Pearson (2022) established that there is an opportunity to harness these motivations to ensure land management to enhance the natural capital and build encourage flora and fauna.<sup>7</sup> There are also opportunities for lower intensive stock management and protection of erosion-prone areas by planting appropriate species that can reduce sediment loss and stabilise hill slopes.

Water quality control is also able to be improved through riparian plantings, wetland recreation and protection of water systems.<sup>8</sup> To achieve this, planning controls are required that acknowledge the benefits of a 'peri urban' environment.

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<sup>3</sup> Section 32 Report, Proposed Change 4 (Tauriko West Urban Limits Change 2018), Bay of Plenty Regional Council

<sup>4</sup> Pearson D. Lifestyle Properties, Ecosystem Services, and Biodiversity Protection in Peri-Urban Aotearoa–New Zealand: A Case Study from Peri-Urban Palmerston North. *Land*. 2021; 10(12):1345. <https://doi.org/10.3390/land10121345>

<sup>5</sup> Ibid.

<sup>6</sup> Ibid.

<sup>7</sup> Ibid

<sup>8</sup> Ibid.



The Landowner Group submits that lifestyle or 'rural residential' provision is integral from a SmartGrowth policy development perspective to prevent further ad-hoc fragmentation of these areas.

The Landowner Group acknowledges the WBOP District Plan distinction between rural residential and lifestyle zones, with the former generally requiring urban-style provision of services such as water and wastewater. The Landowner Group believes this is an important distinction because the implications (particularly cost) of requiring that extent of infrastructure are significant. The lifestyle zone provides a level of self-sufficiency from a servicing perspective and this approach may be more appropriate in the context of the SmartGrowth objectives.

Without sufficient lifestyle provision, there is the possibility of a missed opportunity to enable good design outcomes and ensure the relevant planning controls can realise the benefits of a lifestyle zone and satisfactorily address the issues. Lifestyle zoning may well continue in pockets (so far as District Plan provisions allow), and without coordination this will merely continue fragmentation.

It may be correct that there remains a significant number of vacant lots with potential to be developed,<sup>9</sup> however:

- (a) a further understanding of the reasons for lots remaining vacant would be valuable;
- (b) the existence of latent lots should not preclude provision for lifestyle living in areas where it is appropriate to do so.

It is noted that 364 new lots were created within rural or lifestyle areas within the past five years<sup>10</sup> yet a total of only 500 rural, lifestyle and Small Settlement lots are projected in the coming 30 years (compared with 22,850 in urban growth areas). The projection seems light in the context of the population growth projections and historical data. The data also indicates a shortfall of somewhere between 870 and 7180 houses in the next 30 years, noting challenges bringing greenfield development to market due to infrastructure and national policy requirements.<sup>11</sup> This illuminates the opportunity for a lifestyle zone, less encumbered by infrastructure provision, to come onstream readily and account for part of that shortfall.

SmartGrowth Rural growth directives include the limitation of rural residential growth by providing for living opportunities in appropriate and contained locations within clearly defined boundaries.<sup>12</sup> The Landowner Group agrees with this growth directive to the extent that rural residential or lifestyle opportunities should be provided for where appropriate. The Landowner Group considers the use of rural-residential and lifestyle should be distinguished and suitably defined if there will be practical differences in development standards or expectations between the two, particularly with respect to servicing requirements as these are particularly relevant in the SmartGrowth context. We note that lifestyle is not specifically defined in the National Planning Standards and the Rural Residential definition does not create particular expectations regarding servicing.

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<sup>9</sup> SmartGrowth Strategy 2023, page 93

<sup>10</sup> SmartGrowth Strategy 2023, page 94

<sup>11</sup> SmartGrowth Strategy 2023, page 143

<sup>12</sup> SmartGrowth Strategy 2023, page 95



### Upper Ohauti Lifestyle Area

To underpin the need for appropriate provision of lifestyle zoning, by way of example, the Landowner Group believes a reclassification of the Submitters' Land (along with other properties considered appropriate) from Rural to Lifestyle is sensible to provide for in the SmartGrowth Strategy to ensure any rural development is managed and not ad hoc.

The Landowner Group envisages an outcome similar to the Minden Lifestyle zoning – which is generally considered successful - but without the transferable development right requirement currently provided for in the District Plan rules. Such a zone – with proper planning - can facilitate the development of upwards of approximately 450 lifestyle lots, create significant areas of native planting (88 hectares, and approximately 31% of the Submitters' Land area), along with walk and cycle ways and many other opportunities on the doorstep of Tauranga.

We **attach** a high-level Master Plan prepared as a discussion document to support early consultation, and which is subject to more formal development and scheme planning and associated further investigations.

The Landowner Group submits that Upper Ohauti is an appropriate area to provide for lifestyle development, for the reasons summarised below.

1. The Upper Ohauti Road is already fundamentally a lifestyle area in character as a result of ad-hoc subdivisions over a period of time.
2. The Submitters' Land is not caught by the National Policy Statement for Highly Productive Land and therefore in the 'Go Carefully' Category for the purposes of SmartGrowth.  
The underlying soils are predominantly classes 4 and 6 and therefore development will not result in the loss of highly productive soils. Many other areas in the region are classified as highly productive and therefore significantly less suitable for development in compliance with the NPS-HPL.
3. The current use of the rural land is predominantly grazing which provides little to no return to the owners and therefore marginally economic. It is not the highest and best use of land.
4. The Upper Ohauti area is close to the TCC urban boundary and therefore a potential lifestyle precinct close to town.
5. The area will provide housing choice - although lifestyle living is not the focus of the SmartGrowth strategy, housing choice is acknowledged as important and will continue to remain so and many of the objectives of the SmartGrowth Strategy are met by the proposal.
6. Development of this area does not pose significant infrastructure issues when compared to other areas on the periphery of Tauranga and is able to be undertaken in an environmentally sustainable manner, although roading upgrades will need to be considered in conjunction with TCC with respect to its development work inside its boundary at Upper Ohauti. Upgrading can be planned and provided for over the course of the development. Further urbanisation work and a private plan change (for the adjacent property within the TCC boundary) will likely allow for downstream upgrades of Upper Ohauti Road.
7. Structure planning the proposed lifestyle area will provide more effectively for connectivity via roading and cycle and walkways across the properties in a coordinated manner, appropriate building sites and densities, stormwater management areas and greenspaces.



8. There is an opportunity to provide for an East-West road link which would provide a critical economic corridor along the southern end of the area between Tauriko/Pyes Pa and Te Puke and eastern areas. This has been depicted on the Master Plan and the residents believe there is a potentially viable link which, if not able to be provided for now, could be earmarked for the future especially as the population continues to increase and an additional east-west connection becomes more critical.
9. Servicing of the proposed lifestyle development will be self-sufficient for water supply and wastewater and therefore not a burden to the ratepayer.
10. Stormwater can be managed on-site and more generally through the network of planted gullies established with indigenous plantings to enhance quality of the freshwater and ensure no net downstream increases in stormwater loading.
11. The topography of the area best lends itself to lifestyle development (with pockets potentially suitable for higher levels of density).
12. The development will 'work with' existing topography – what nature has already provided. Buildings will be in the right place and gullies will be planted into an ecological corridor with provision made for associated cycle and walkways to enhance physical and mental wellbeing.
13. There are already substantial ecological plantings on several properties in the area which provide special amenity and biodiversity benefits. There is a tremendous opportunity to extend these plantings across the area (and build the cycle and walkways alongside these) and create an exceptional ecological corridor linking with other areas to the east, west and possibly south and which will benefit current and future generations.
14. In addition, there is a pa site within the area which could be connected to the walkway network and provide for reconnection for tangata whenua and the general population with history.
15. Cycle and walk connections can connect into the TCC area to provide safe passageways across boundaries and into town. The cycle and walkways will be able to link across to the TCC boundary and into town, providing off-road connection to the future school and other urban areas and reduce cars (and therefore emissions) using the roads.
16. A small commercial hub would also provide a level of servicing for residents in the community to meet certain needs, including groceries for example, as well as meeting places (such as a café or restaurant). This will help to reduce emissions.
17. TCC is providing for further urban development within its boundary at Upper Ohauti, and there a new primary school has been earmarked for development in this area.
18. The Upper Ohauti lifestyle area will provide additional housing choice beyond the urban context (consistent with the 'Homes for Everyone' transformational shift). With the Minden lifestyle area currently at capacity (subject to completion of the Northern Link), there is an opportunity to make provision for an alternative lifestyle area. A thriving, growing city needs to provide for lifestyle and housing choice in order to retain families within the district over the long term. If residents who seek more living space can't get it, then they will move away from the area.
19. We currently have a group of landowners supportive of a prospective planning change however this is unlikely to endure for the medium term therefore the opportunity for a smooth process is finite.





## Summary

The Landowners Group agree with the general direction of the SmartGrowth Strategy and the growth directives in the Rural chapter.

However, the Landowner Group believes that rural residential living options have been inadequately accounted for, that demand will exceed the projected supply and that provision in SmartGrowth mapping is appropriate and desirable to identify potentially suitable lifestyle areas.

In particular, the Landowner Group:

- considers rural residential and/or lifestyle living has not been adequately accounted for in projections, particularly in the context of historic data and the substantial population projections. Demand for lifestyle living is unlikely to reduce to the levels projected.
- seeks that SmartGrowth identifies in the maps potential lifestyle areas, including the Upper Ohauti Area (that being the land to the south of the current TCC boundary up to Rowe and Neewood Roads. The maps depict industrial and urban areas, but disregard rural residential areas.
- believes inadequate provision of lifestyle living areas will only serve to allow more uncoordinated development continuing fragmentation without necessarily positive design outcomes. The Upper Ohauti area for example is already essentially a lifestyle area, if not in name but character, and the land is not constrained by the highly productive land restrictions.
- believes the SmartGrowth Strategy should acknowledge and set the conditions for appropriate lifestyle development in the Bay of Plenty subregion, for example servicing (and financing of servicing), stormwater management, access, connectivity within an area and with existing urban areas, soil requirements (i.e. not highly productive land) and expectations for ecological enhancement and greenspace provision.
- acknowledges the difference between rural residential and lifestyle zones, particularly in the context of servicing provisions, and notes this distinction is relevant when considering potential zoning settings. Consistency or alignment in terminology (flowing into District Planning) is appropriate.
- seeks an acknowledgement of the positive outcomes that lifestyle living on the peri urban fringe can provide with respect to ecological enhancement and management of plant and animal pests.
- believes the current SmartGrowth Strategy process provides an important and logical opportunity to identify potentially suitable lifestyle precincts which meet SmartGrowth objectives, with a strong focus on restorative ecology, recreation and a strong community focus.
- Seeks that the Master Plan (attached) is considered and utilised as a base for the provision of lifestyle zoning in Upper Ohauti as part of the SmartGrowth Strategy and subsequent WBOPDC Planning.

The Landowner Group wishes to be heard at the hearing and progressing this further with SmartGrowth and WBOPDC.



sub 79

land||play

UPPER OHAUTI  
MASTER PLAN

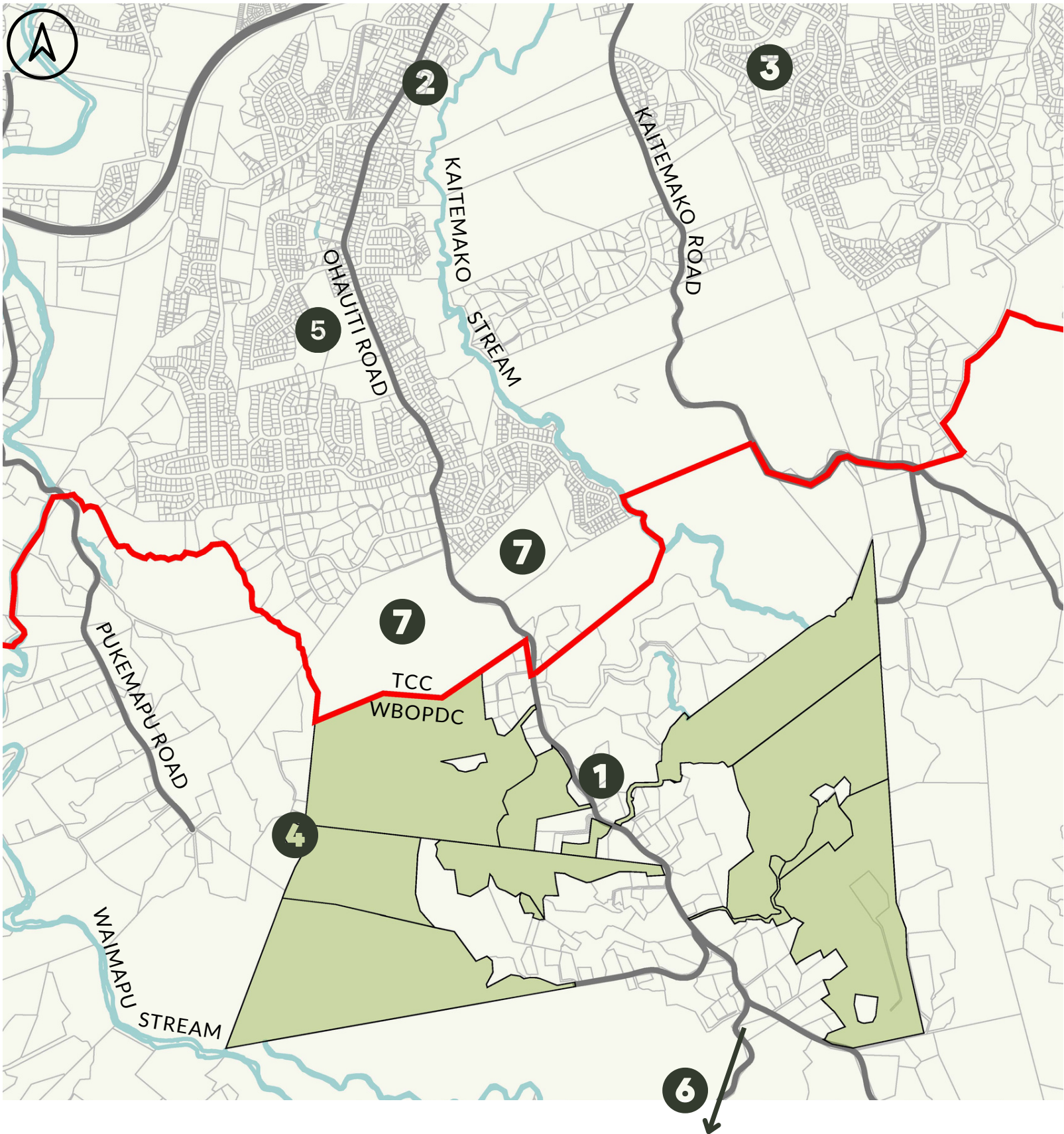
*This is a discussion document for consultation purposes only and subject to further development*



# 1 | LOCATION

## UPPER OHAUITI MASTERPLAN

sub 79



The Upper Ohauti Master Plan Area is a response to the significant population and urban growth forecast for Tauranga and beyond. It is a unique collection of northerly facing rural landholdings with the Ohauti Settlers Hall at its heart. The adjoining TCC Growth Area and proximity to the CBD make this a logical expansion of the urban boundary.

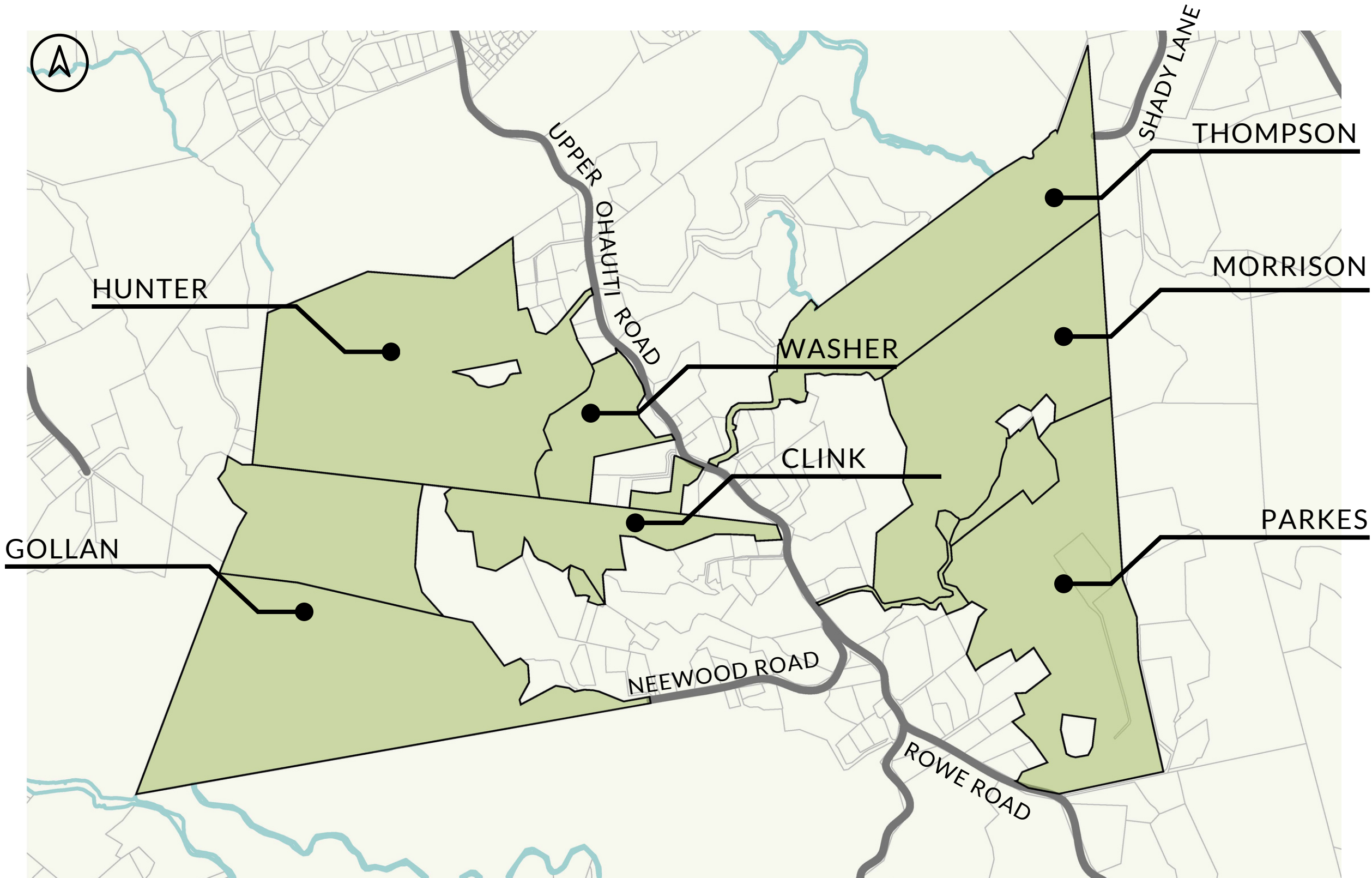
- 10-16 minute drive to Tauranga Hospital
- 10-15 minute drive to Tauranga Crossing shopping complex
- 12-20 minute drive to Bayfair Shopping Centre
- 14-20 minute drive to downtown Tauranga and the waterfront
- 20-30 minute drive to Mount Maunganui
- 15-25 minute drive to Tauranga Airport

- 1 OHAUTI SETTLERS HALL (0mins)
- 2 FOURSQUARE OHAUITI (5mins)
- 3 SELWYN RIDGE PRIMARY SCHOOL (10mins)
- 4 PĀ SITE (NZAA ID: U14/20 )
- 5 OHAUITI RESERVE (3mins)
- 6 OROPI PRIMARY SCHOOL (18mins)
- 7 TCC EXISTING GROWTH AREA



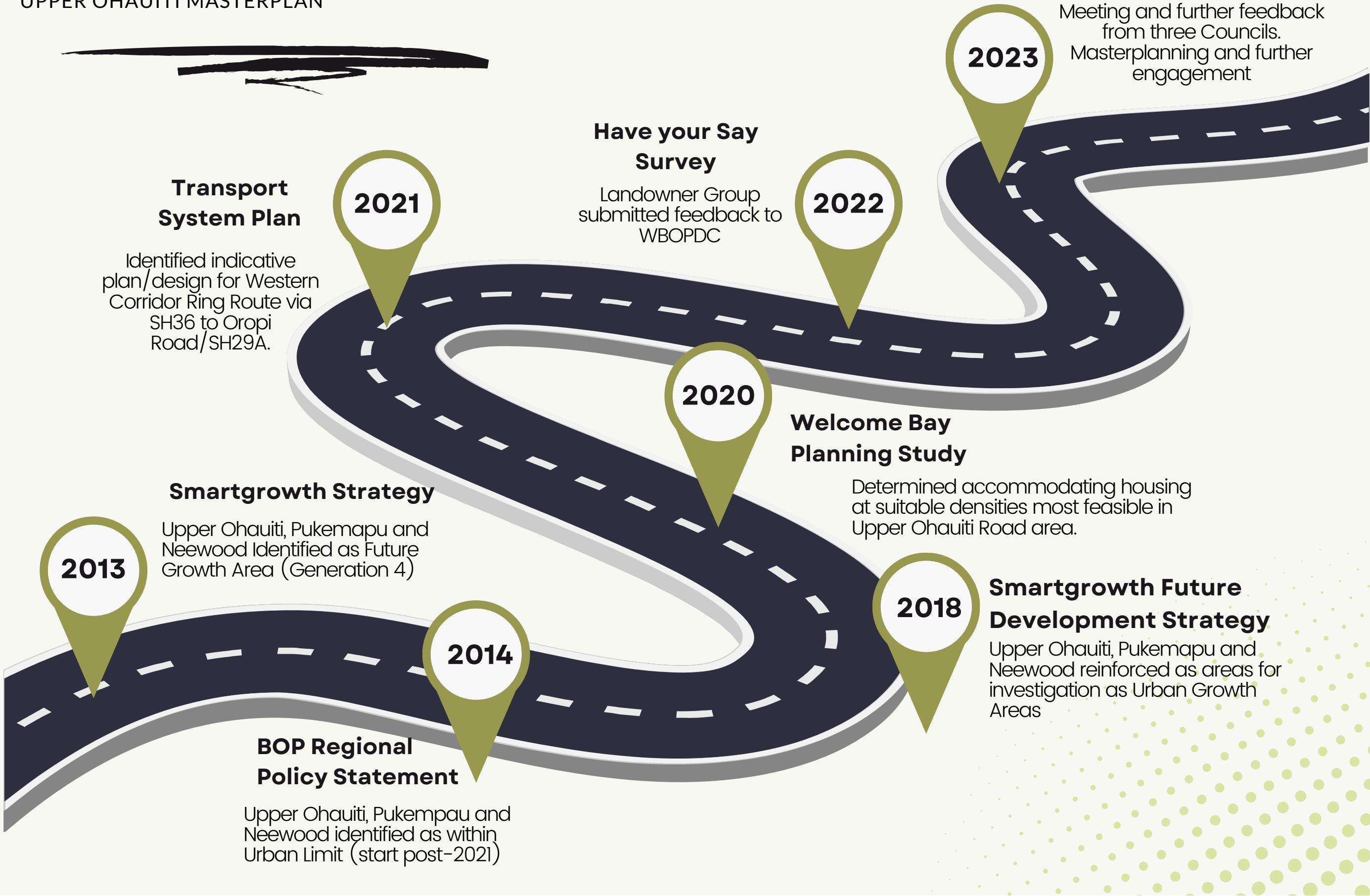
2 | LANDHOLDING  
UPPER OHAUITI MASTERPLAN

sub 79



# 3 | TIMELINE

## UPPER OHAUITI MASTERPLAN



## 4 | TIMELINE - FURTHER CONTEXT

### UPPER OHAUITI MASTERPLAN

#### JUNE 2022 - HAVE YOUR SAY SURVEY

WBOPDC called for feedback as part of the 'Have Your Say Survey'. The Upper Ohauti group of landowners collectively agreed to provide feedback.

The essence of the feedback was that the collective properties as part of the Upper Ohauti area close to the Tauranga City urban boundary provide a logical area for lifestyle zoning as part of the next District Plan Review.

#### MARCH 2023 - MEETING WITH COUNCIL

Following the Survey, we have engaged further with WBOPDC. The landowners met with various Council representatives in March 2023, following which further feedback was obtained from Tauranga City Council and Bay of Plenty Regional Council.

Council consideration was given to the various Regional and District Plans, National Policy Statements and other Council-initiated studies or documents, including the Welcome Bay Planning Study.

**Further work has continued to be done to develop the basis for a lifestyle zoning of the area.**

#### PLANNING BACKDROP

Upper Ohauti has already been identified as a future growth area in Regional Planning Documents and SmartGrowth.

An property adjoining one of these properties, within the TCC boundary, is currently subject to a plan change to rezone the subject property residential. TCC is also driving development within Ohauti having recently acquired 20 houses to facilitate access and traffic movement. A new primary school is also being planned for this area.

The properties on the western side of Upper Ohauti Road have previously been identified as within the Urban Limits (starting post-2021) in the Bay of Plenty Regional Policy Statement.

These properties, as part of the Upper Ohauti area (referred to as Ohauti South), have been recognised as within a Identified Urban Growth Area (SmartGrowth Strategy 2013) and also been identified as a Future Greenfield UGA Area by Smartgrowth (SmartGrowth Development Trends 2021). One of the recommendations was for Council to progress investigations into the Upper Ohauti sub-precinct (in line with the Regional Policy Statement and indicative provisions regarding the sequencing of growth areas.

Although there are some areas in the Upper Ohauti area which may be appropriate for residential development, there are various reasons why the general Upper Ohauti Area is most suited for lifestyle zoning, rather than either rural or residential. Some of these were recognised in the Section 32 Report for Proposed Change 4 (Tauriko West Urban Limits Change 2018). If that is the case, then lifestyle zoning will not detrimentally impact prospects for future residential development.



5 | VISION  
UPPER OHAUITI MASTERPLAN

sub 79



RECREATION



REGENERATION



SUSTAINABILITY



CULTURAL  
CONNECTION



DIVERSITY



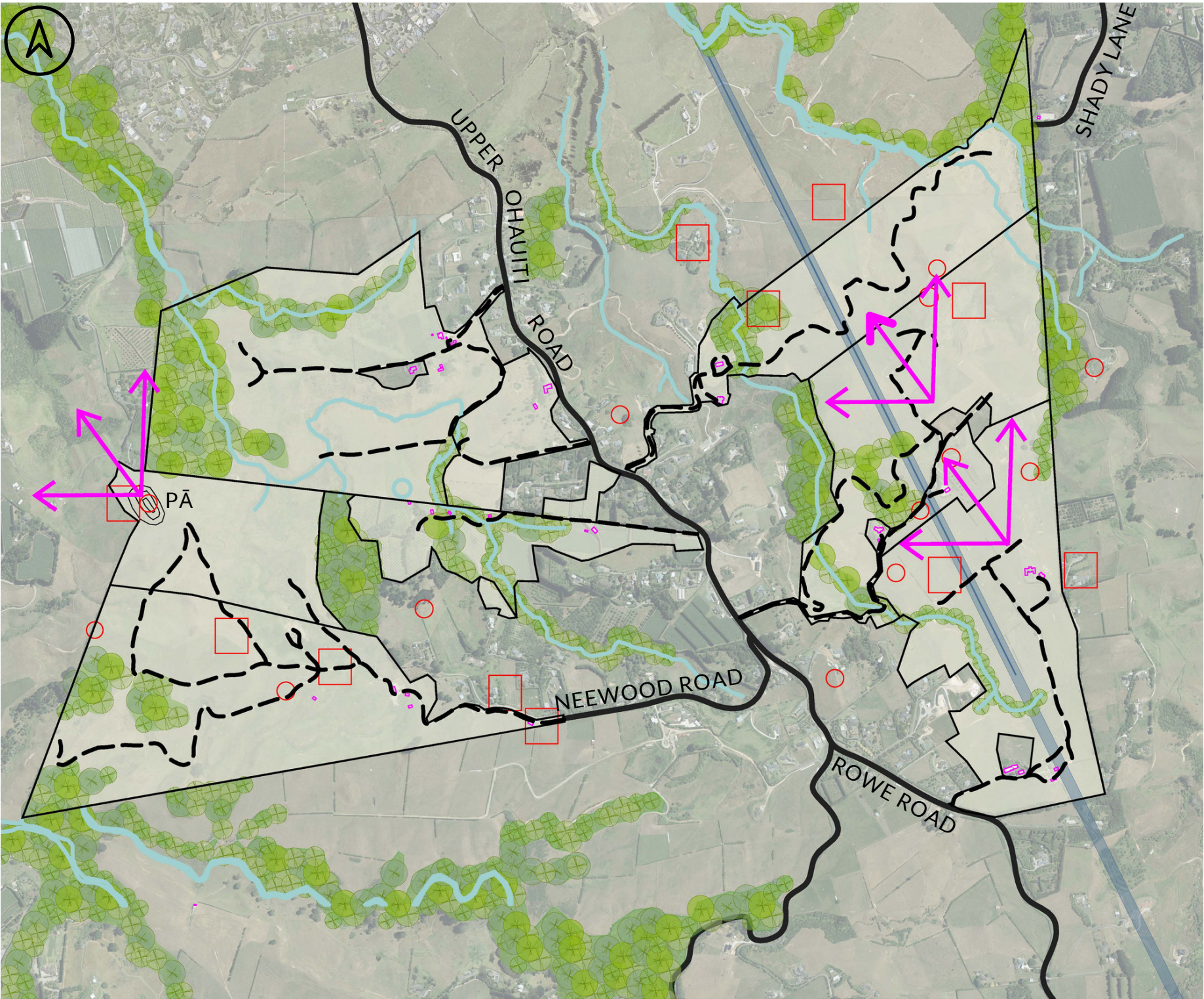
DESTINATION



# 6 | CONSTRAINTS & OPPORTUNITIES

## UPPER OHAUITI MASTERPLAN

sub 79



Natural features and existing elements provide distinct cues for the development framework. These have been used as organising elements to guide a design that strengthens the character and amenity of the area.

The east and west blocks separated by Upper Ohauti Road, present different constraints and opportunities. The western block has clear viewshafts to Tauranga Harbour, Mauao and the Kaimai Ranges. The western block is secluded and tranquil with an accessible interface with stream edge, native bush, and linkage to culturally important pā site.

LEGEND

- EXISTING PLANTING
- ARCHAEOLOGICAL SITE
- ARCHAEOLOGICAL SITE
- EXISTING STREAMS
- EXISTING TRACKS
- EXISTING BUILDINGS
- VIEWSHAFTS





7 | GREEN SPACE NETWORK

UPPER OHAUITI MASTERPLAN

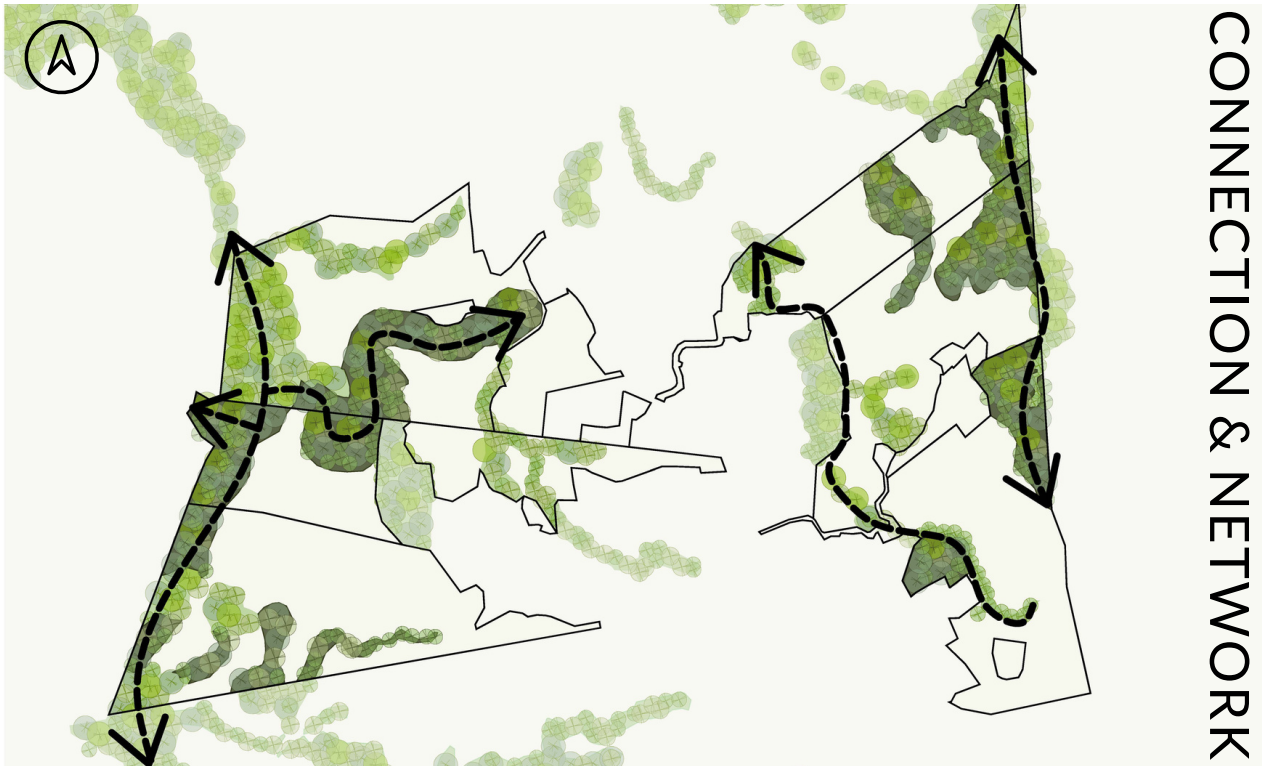
sub 79



Existing vegetation patterns are characterised by rural landuse, shelter belts and pasture enclosed by steep escarpments. Some native planting has already been undertaken around the stream corridors. Further ecological enhancement and green movement will form the building blocks of this development.

The master plan recognises the amenity and significance of the natural landscape. Proposed planting corridors blend with the adjacent green belt infrastructure to link the site back to the wider community. Planting on the steep escarpments and riparian boundaries will play a crucial role in stabilising soil, improving water quality, increasing biodiversity and offering long term erosion control.

The development will promote access to, and recreation within these spaces.

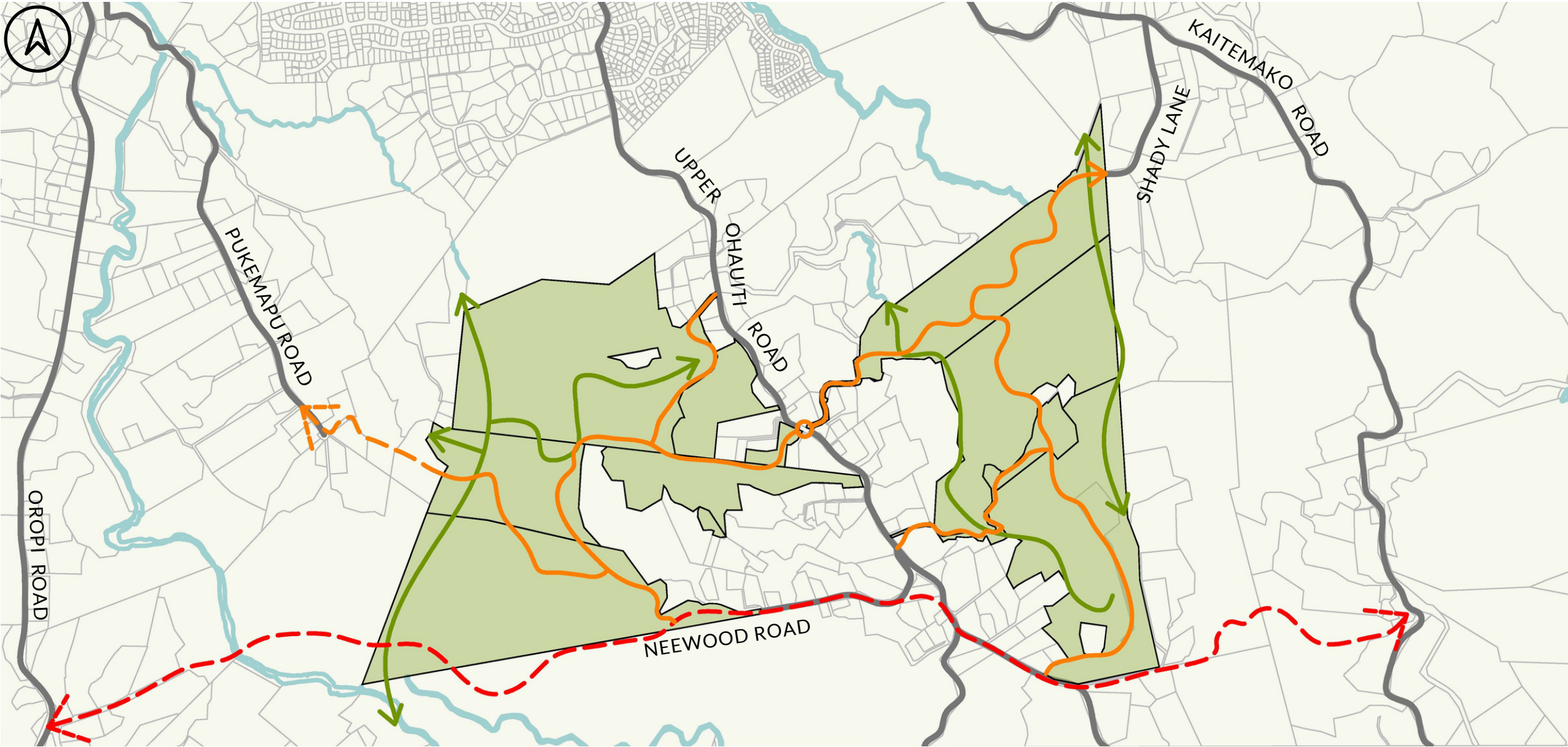




# 8 | ROAD NETWORK

## UPPER OHAUITI MASTERPLAN

sub 79



The primary road network follows the topography of the site and meanders through the landscape, creating a variety of outlooks and places of pause to take in the surrounds, without significantly altering the natural form of the land.

This development also provides an opportunity to incorporate a higher order east to west network linkage from Oropi Road to Kaitemako Road which would alleviate the pressure on the roading network at the State Highway 29 junctions. This linkage is indicative only and subject to further investigation.

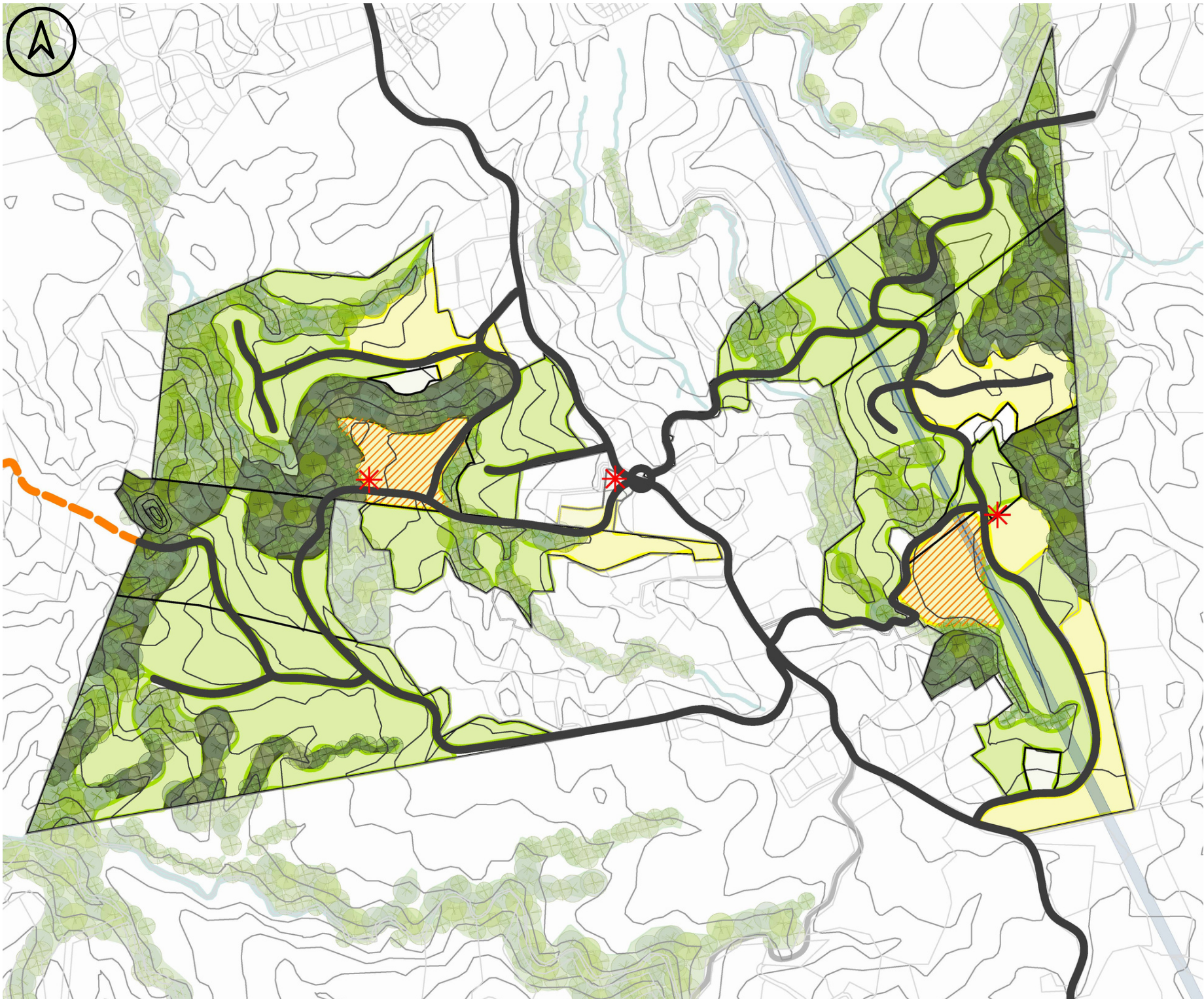
- LEGEND**
- EXISTING ROADING NETWORK
  - PROPOSED PRIMARY ROADING NETWORK
  - PROPOSED GREEN CONNECTIONS
  - POSSIBLE EAST - WEST CONNECTION
  - POSSIBLE CONNECTION



7 | MASTERPLAN

UPPER OHAUITI MASTERPLAN

sub 79



The proposed development provides a variety of land options and attractions, responding to the current social, cultural, and economical needs for housing affordability and adaptability (aging in place) as well as high quality public spaces.

A number of opportunities exist to provide commercial and community centres such as restaurants, cafes and accomodation options, healthcare and all ages living.

TYPE	RES A	RES B
LOT AREA	2500m2	5000m2
LOTS/HA	4	2

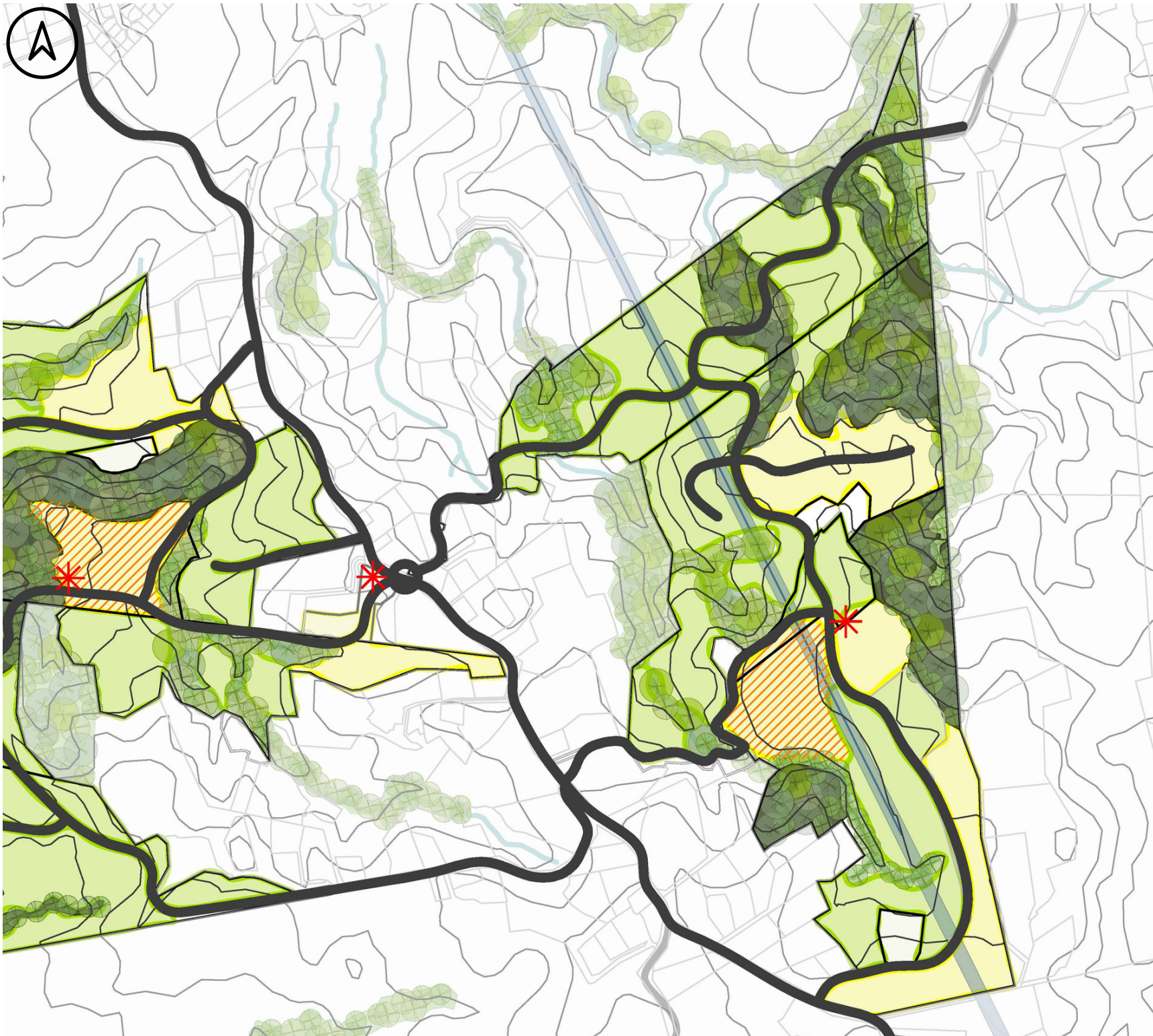
- LEGEND
- ROADING
  - RESIDENTIAL A
  - RESIDENTIAL B
  - RETIREMENT VILLAGE OVERLAY
  - COMMERCIAL ZONES/FACILITIES



8 | MASTERPLAN - EASTERN BLOCK

UPPER OHAUITI MASTERPLAN

sub 79



THOMPSON BLOCK			
LANDUSE	AREA (HA)	# LOTS	%
RESIDENTIAL A	0	-	0%
RESIDENTIAL B	17.3	35	51%
OPEN SPACE AMENTY	12.8	-	37%
PRIMARY ROADING	4	-	12%
TOTAL	34.1	35	

MORRISON BLOCK			
LANDUSE	AREA (HA)	# LOTS	%
RESIDENTIAL A	8.8	35	20%
RESIDENTIAL B	18.9	38	43%
OPEN SPACE AMENTY	14.3	-	32%
PRIMARY ROADING	2	-	5%
TOTAL	44	73	

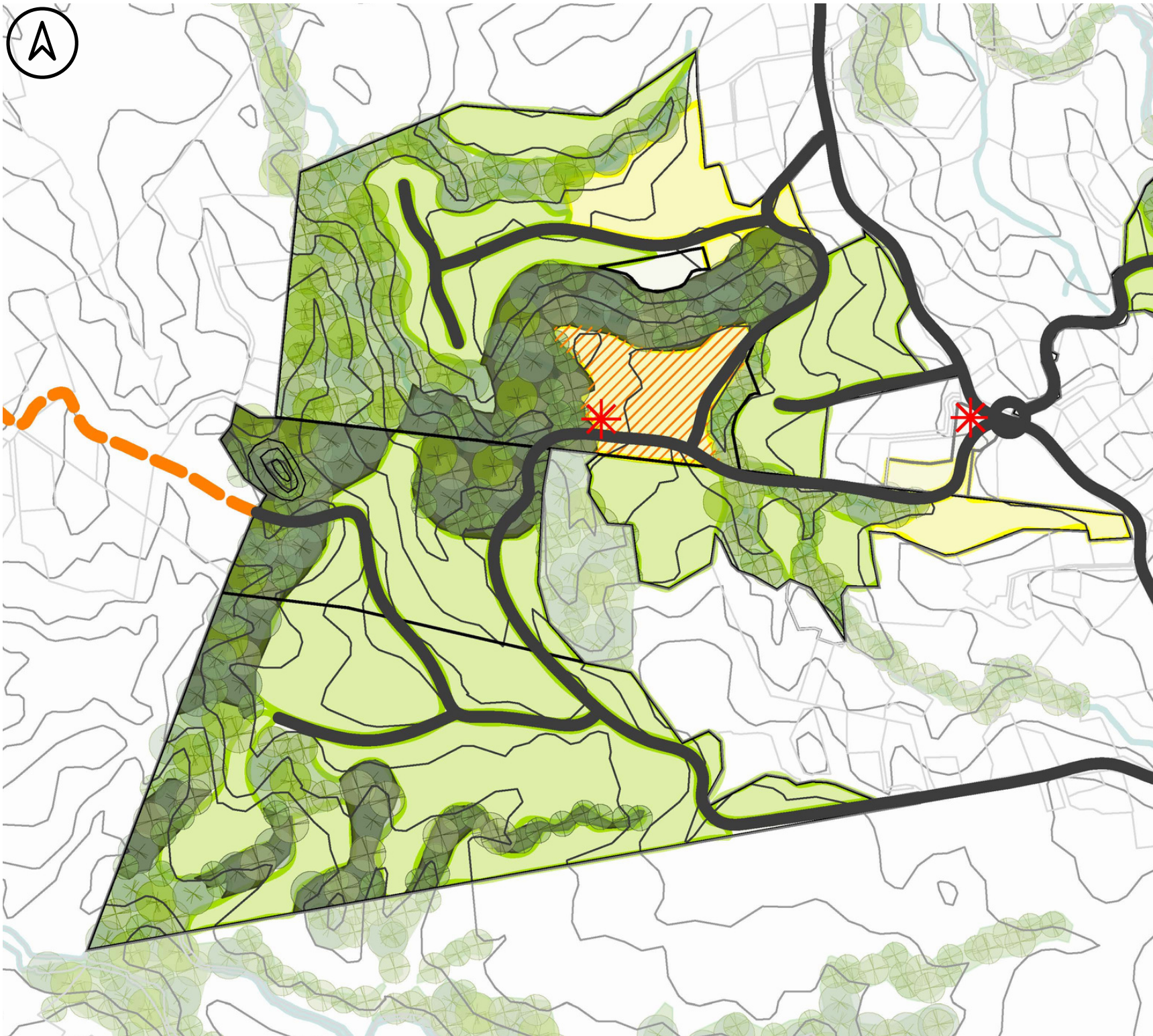
PARKES BLOCK			
LANDUSE	AREA (HA)	# LOTS	%
RESIDENTIAL A	16.7	67	37%
RESIDENTIAL B	12.4	25	29%
OPEN SPACE AMENTY	11.5	-	27%
PRIMARY ROADING	2.5	-	7%
TOTAL	43.1	92	



9 | MASTERPLAN - WESTERN BLOCK

UPPER OHAUITI MASTERPLAN

sub 79



HUNTER BLOCK			
LANDUSE	AREA (HA)	# LOTS	%
RESIDENTIAL A	23.2	93	41%
RESIDENTIAL B	11.2	22	20%
OPEN SPACE AMENTY	18	-	32%
PRIMARY ROADING	4	-	7%
TOTAL	56.4	115	

WASHER BLOCK			
LANDUSE	AREA (HA)	# LOTS	%
RESIDENTIAL A	0	-	-
RESIDENTIAL B	8.2	16	90%
OPEN SPACE AMENTY	0.5	-	5%
PRIMARY ROADING	0.5	-	5%
TOTAL	9.2	16	

CLINK BLOCK			
LANDUSE	AREA (HA)	# LOTS	%
RESIDENTIAL A	4	16	24%
RESIDENTIAL B	6.7	13	40%
OPEN SPACE AMENTY	4.6	-	28%
PRIMARY ROADING	1.2	-	8%
TOTAL	16.5	29	

GOLLAN BLOCK			
LANDUSE	AREA (HA)	# LOTS	%
RESIDENTIAL A	0	0	-
RESIDENTIAL B	43.3	87	58%
OPEN SPACE AMENTY	26.6	-	35%
PRIMARY ROADING	5.2	-	7%
TOTAL	75.1	87	

10 | THE OPPORTUNITIES

UPPER OHAUITI MASTERPLAN

sub 79

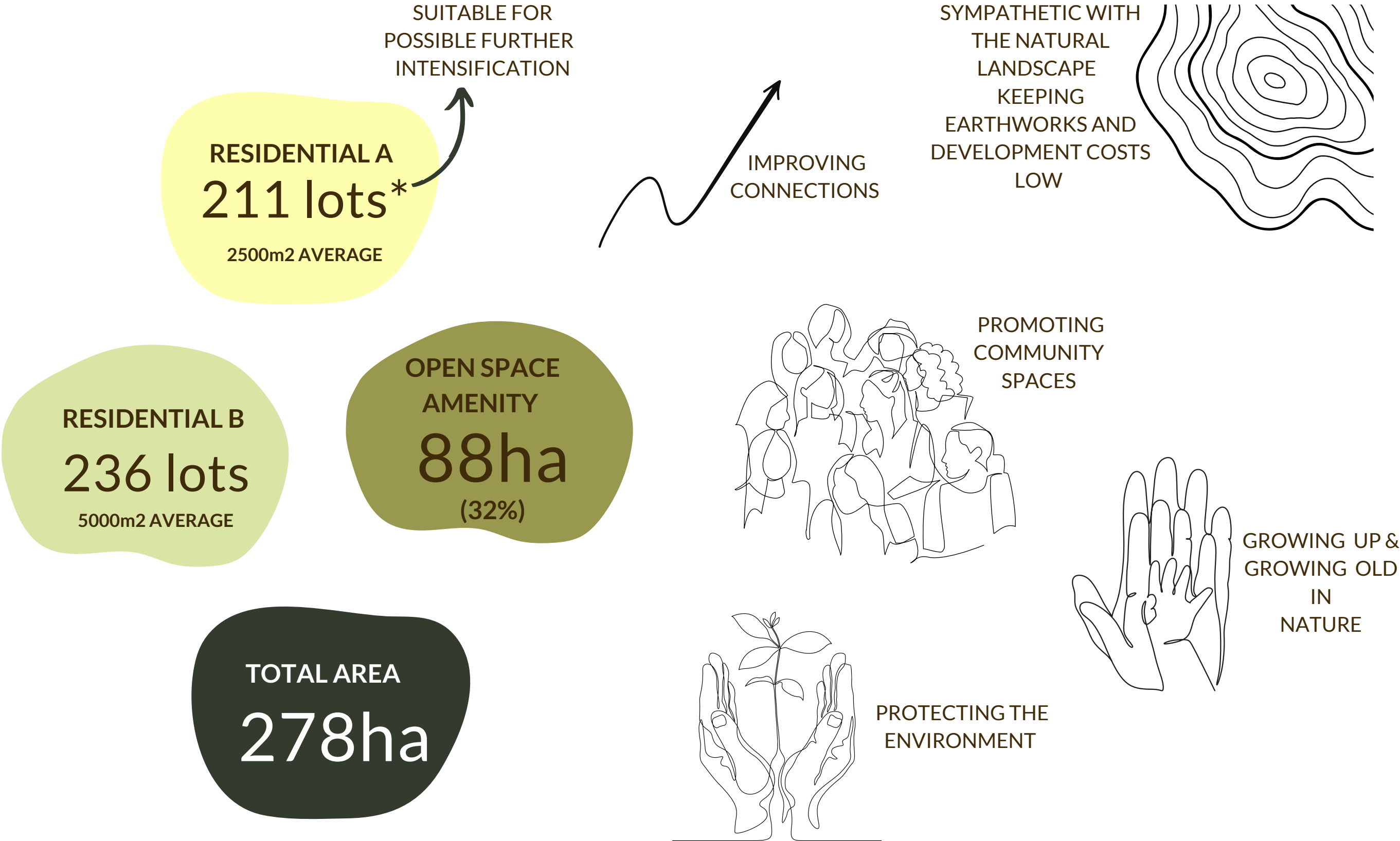




11 | SUMMARY

UPPER OHAUITI MASTERPLAN

sub 79





12

|

LOOK & FEEL IMAGERY - RURAL RESIDENTIAL

UPPER OHAUITI MASTERPLAN

sub 79





13 | LOOK & FEEL IMAGERY - COMMUNITY HUB  
UPPER OHAUITI MASTERPLAN

sub 79





14 | LOOK & FEEL IMAGERY - SIMILAR DEVELOPMENTS

sub 79

UPPER OHAUITI MASTERPLAN





sub 79

THANK YOU!



Rose Carnachan

Carl Salmons

[www.landplay.co.nz](http://www.landplay.co.nz)



Rosa Charteris

[www.maven.co.nz](http://www.maven.co.nz)



Sub 80

[submit@smartgrowthbop.org.nz](mailto:submit@smartgrowthbop.org.nz)**SUBMISSION TO SMART GROWTH - 20 OCTOBER 2023**

Page 1/2

**FROM PAUL HICKSON -paul@paulhickson.com****DATE 20 OCTOBER 2023****BACKGROUND**

My family has farmed at Pongakawa since 1892. I reside on the original family farm where we grow kiwifruit and are dairy farming with our sharemilkers. I also have a small chartered accounting practice which I have run from my home office since 1985.

I am also Chairperson of Te Puke Economic Development Group who has made a submission, I support their submission but this one is my personal submission.

**PAST PERSONAL SUBMISSIONS**

I have included two of these as the comments made are relevant to matters I think Smart Growth should consider in their planning and they give a historical context.

**Appendix to submission re BOP Regional Land Transport Strategy - 4 August 2004**

As I will not be speaking to my submission I comment further why I support speeding up construction of the strategic roading network and other roading projects by seeking alternative funding sources.

1. Road congestion is impeding economic growth and costing existing business and residents money through traffic delays and slow travel to work. E.g. Tauranga Harbour Bridge/Hewletts Road.
2. Proposed industrial parks in Papamoa and Rangiuru need to be serviced by good roading. This would apply in other areas. E.g. Rotorua - Te Ngae Road.
3. The recent floods in the Eastern Bay illustrate the logistics problems caused by networks that do not have alternative routes within a reasonable distance. I have experienced long delays in recent years on SH2 near Katikati and at Waitangi, near Te Puke through accident holdups or resealing holdups. Damage to the bridge over the Kaituna River would be a costly exercise for the kiwifruit industry during harvesting with the alternate route being via Hamurana/Pyes Pa?
4. With the continuing population growth it is important the roading network keeps pace.
5. I would support tolling on specific routes and where a linked network is established would support cross subsidy if an economic benefit could be argued.

**Comment on above from October 2023 perspective -**

Road congestion - add Totara Street and Tauriko area and need for bypasses at Katikati and Te Puke.

Industrial Parks - TEL provides good access to Rangiuru Business Park

Alternative routes - TEL fixes Kaituna problem.

**Smart Growth Submission - 2006.**

**SUMMARY OF ALL SUBMISSIONS MADE ON THIS SECTION:** (2006) *Submission no 82*  
(Your Submitter Name and Number are Highlighted)

**Paul James Hickson****82.0001**

Qualified support. Whilst I agree with the basic thrust of SmartGrowth, I don't think it has addressed prospective growth in the region from Te Puke to Otamarakau / Matata in enough depth. Thus I think it is dangerous to draw firm lines around areas for 50 years at this stage. If the Rangiuru Business Plan proceeds then people will also want to live east of it as well as west. The coastal aspect and existing social infrastructure at Pongakawa make it an attractive place. Also the escalating coastal land prices at the Mount and Papamoa will make people search for more affordable coastal land.

1. Further investigation of the Te Puke - Otamarakau / Matata area.
2. Rural Structure Plans should make specific reference to areas noted.
3. Final outcomes should have flexibility (it is a 50 year plan)
4. Cluster development could be a model to follow for the area.

**Staff Recommendation: Reject**

In my opinion all comments I made then still apply and I address some points on page2.

Sub 80

SUBMISSION TO SMART GROWTH - 20 OCTOBER 2023

Page 2/2

FROM PAUL HICKSON - paul@paulhickson.comDATE 20 OCTOBER 2023THE EAST

Smart Growth has concentrated to a large degree on Tauranga and growth of the city, including Tauriko whilst the East has been largely ignored in terms of residential growth. This is poor planning as the East offers:

**Kiwifruit Industry**

We are the international leaders in this industry and over half the growth is happening in Te Puke and areas east of Te Puke. This requires a growing labour force and while large accommodation sites like Kiwi Corral and Bay Gold exist, encouraging a permanent work force who own their houses and feel part of a community should be the long term aim. Therefore rural villages should be allowed to evolve at Paengaroa and other places.

**Coastal Living**

Many people enjoy coastal living. This is a fifty year plan so there are places from Pukehina to the East like Otamarakau and Rogers Road that are elevated and would offer great opportunity for small settlements.

In considering the above it should be noted that the East offers:

Employment - growing work force in kiwifruit and Rangiora business park, in addition to normal growth.

Social Infrastructure - Schools both rural and in Te Puke

Sports facilities at ED, Paengaroa, Action Centre at Pongakawa

Swimming pools and sports fields at local schools.

Te Puke - offers community arts, culture and sports clubs serving the whole district.

Transport network - Rail from Kawerau and TEL in addition to other roading.

Water Concern in the East about water flowing out of catchment so this should cease and water kept for use by industries in the East.

I am aware that Smart Growth has future plans for a city in the East in the Paengaroa or Business Park area. However this should not prevent natural growth in rural housing and settlements to support the growing workforce.

I recall some of the parameters I have read in past Smart Growth reports underestimated the growth of the kiwifruit industry. Projections for rural house growth are far too low over the period.

I also note that the census is taken before the peak of the kiwifruit season and therefore population counts are lower than peak so planning may be flawed as a result. Of course the same applies to tourist centres like the Mount, Pukehina and Waihi Beach.

**Use of Horticulture Land**

People often object to the loss of valuable farm land, so care has to be taken in siting settlements. However there are many pockets of land in the East that would be suitable. One suggestion that a WBOP councillor made was that rural land owners should be allowed to build an extra dwelling on their lots without resource consent. This should be considered as land owners are best placed to look at the cow or person argument. An advantage of this approach is that they would provide the infrastructure.

OTHER MATTERSEnvironment

Smart Growth must consider the loss of urban green space and sun robbing in its residential planning. It must also recognise that our valuable coastline and ocean adjoining the Bay of Plenty has to be protected. The importance of BOP Regional Council and our rural sector through Fresh water Farm Plans and planting initiatives must be noted.


Plan Change 33 and Mount and Arataki Spatial Plan.

My family have been ratepayers at the Mount since 1976. I made a submission in opposition to Plan Change 33 as did many others. Smart Growth should look carefully at the summary of these submissions rather than plan on what Central Government requires under Plan Change 33. Planning for 50 years requires community buy in and those who live and invest in communities should be treated as the most important.

The Future

What ever Smart Growth comes up with in its final plan there has to be flexibility so that Councils may consider new ideas instead of referring to their rule book. A good idea, after community consultation and approval, should never be cast aside because of decision makers hiding behind Smart Growth.

I wish to appear at any hearing to support of my submission.

  
Paul Hickson  
Pongakawa

20/10/23



18 October 2023

SmartGrowth Strategy  
c/- 306 Cameron Road  
Tauranga

██  
Attention: Andrew Turner

Dear Sir,

**Urban Taskforce for Tauranga (UTF) – Submission on Draft SmartGrowth Strategy 2023**

The Urban Taskforce for Tauranga appreciates the opportunity to make this submission on the Draft SmartGrowth Strategy (2023).

The Urban Taskforce has been incorporated as a Society, with its purpose being to represent its members who are property professionals and funders, developers, iwi and hapu, and owners and managers of properties in the Western Bay subregion.

The Urban Taskforce seeks to provide strong and informed leadership to local authorities, promote and foster productive local networks around property and related issues, and to advocate for our industry, by making submissions to both Central and Local Government. The Urban Taskforce advocates for connected thinking, connected planning, connected government, and strong leadership.

Tauranga is a growing city. Our community is now facing unprecedented challenges because past leaders have seen growth as a problem rather than as an opportunity. The Urban Taskforce is focused on the opportunities presented by growth and to unlock these opportunities by working collaboratively and innovatively across Local Government and the private sector.

Tauranga has a severe shortage of zoned and serviced land to provide new homes for residents and spaces for businesses to invest in. This has created severe housing and business affordability issues. Failing growth management has also led to a lack of essential community infrastructure and facilities, and a lack of investment in utilities infrastructure necessary to support growth.

As per the advice received at the Development Sector Group on the 28<sup>th</sup> of September 2023, please accept this submission as a general summary/overview of the Taskforces submission and feedback on the Draft Strategy. It is understood that the process provides for this initial submission, with the

ability to provide further technical detail in support of the submission (as well as expert evidence) at the hearing on the Draft Strategy to be held in December 2023.

Our membership and Executive have provided feedback and comments on the Draft Strategy as set out below.

### **General**

The Urban Taskforce supports the SmartGrowth Strategy and considers that it is critically important that the Council's and other partners work in a more aligned manner to plan for the future of the subregion. The Smartgrowth Strategy must provide a guiding framework to deliver employment and housing and assist to resolve the significant crisis in terms of business and residential land supply. The Strategy needs to better recognise the critical need for Smartgrowth to work more closely and collaboratively with the development community to resolve the current sub-regional residential and business land supply crisis.

### **Challenges for Growth**

The current reality for growth in the wider Tauranga area is that residential growth is currently constrained, with Papamoa nearly being at capacity which leaves only intensification, Omokoroa and Te Puke to provide the necessary housing supply in the short term.

The Urban Taskforce considers that the Smartgrowth Partners need to ensure and adopt a much more flexible approach to ensuring there is future land supply available to provide for the growth needs of Tauranga.

The approach of identifying a narrow range of sites for future growth has been problematic particularly where sites are constrained in terms of infrastructure or where there is the inability to deliver business and residential land in a timely and efficient manner.

### **Role of the Development Community in the SmartGrowth Partnership**

The Draft Strategy provides for very little in the way of policy direction requiring Council's and the SmartGrowth Partners to work collaboratively with the development community. Ultimately the role of the development community is critical to the success of the Strategy. The Strategy must provide explicit recognition that it is the development community that leads the delivery of much of the Strategy, including the acquisition of land, undertaking planning processes (including rezoning) and the delivery of infrastructure.

The Urban Taskforce considers that developers have a significant role in terms of long-term planning, working in collaboration with Smartgrowth Partners and other providers to deliver infrastructure and urban outcomes from the very inception of planning processes.

The importance of the role of developers is very clearly set out in the National Policy Statement – Urban Development (NPS-UD). This requires that Council's must engage with the development sector to prepare the housing and business development capacity assessment, Council's must engage to identify significant opportunities for urban development and the future development strategy, as well as seeking advice from the development sector about what factors effects the feasibility of development. There is also a requirement for capacity to be based on commercial viability to a developer, based on the current relationship between cost and revenue.

The Strategy requires amendment to ensure that there are appropriate policies included that mandate the above role of developers so that this is clearly recognised and provided for.

The reality is that without this developer investment and confidence, the actions from SmartGrowth are unlikely to be realised.

SmartGrowth is often criticised for its lack of delivery. There is a real opportunity to improve delivery of the Strategy through better engagement and collaboration with the development sector. There are a number of actions which should be incorporated within the Strategy in relation to the development sectors involvement which also reflect the requirements of the NPS-UD. These actions are as follows:

1. The development Sector Group (DSG) should be formally included in the SmartGrowth structure, with representation on the SmartGrowth Leadership Group (as per the model for the combined Tangata Whenua Forum and Infrastructure Providers).
2. Priority Development Areas should involve strong and early engagement with the development community, both in terms of identification but also in terms of developing servicing and infrastructure solutions for land.

#### **Integrity of the Strategy**

It is critically important that the integrity of the Strategy is not undermined by individual SmartGrowth Partners. In particular, background reports which identify and categorise areas suitable for employment land must be applied in the strategy based on the technical assessments (i.e. the Aurecon Industrial Land Assessment) completed by technical experts. Similarly, the feasibility (both in terms of infrastructure provision and land cost) of residential land at the eastern end of the eastern corridor needs to be properly assessed. Further comment is provided on this below.

The public submission and review process is the appropriate mechanism by which areas can be identified or included within the strategy as Priority Development Areas through a clear and transparent process based on evidence and technical assessment.

#### **Significance of the Future Development Strategy**

The Future Development Strategy (FDS) is a joint strategy within the overall urban growth policy system and is a significant strategy. It is the primary long-term strategy upon which all large-scale long-term decisions and investments are based, by both the public and private sector. The FDS effectively replaces the substantive content of the Regional Policy Statements Urban Growth Policy. The FDS must be a very stable policy instrument.

It should be implicit that where an area is identified for growth and the SmartGrowth Partners have agreed on its overall appropriateness (including the tradeoffs that have been made), that growth options have properly considered costs and impacts. Feasibility is critically important and further policies are required to be included in the strategy which require the economic feasibility of sites to be considered as a key consideration. For example, high value kiwifruit land to the east of Paengaroa (at the eastern end of the Eastern Corridor and beyond) is unlikely to be feasible for residential or employment purposes due to high land cost. Further policies must be incorporated in relation to the need for feasibility to be fully understood.

When SmartGrowth implementation occurs through RMA and other processes, there should not be any fundamental disagreement from any SmartGrowth Partners on the direction. The focus at that point should be on implementation and not the strategy. SmartGrowth Strategy actions need to make this clear.

#### **Commercial Strategy Review**

It is essential for the Commercial Strategy Review to be completed on a subregional basis to achieve a consistent outcome. This work is overdue and needs to be led by Tauranga City Council and prioritised. The indicative Centre Strategy as set out, is woefully inadequate and further urgent work is required to be completed on this. The review needs to be based on collaboration with stakeholders from inception through to completion including the development community, taking into account any completed spatial plans. Engaging with the development community after the completion of the bulk of the technical work will miss key information and opportunities and is a recipe for future conflict and rework. This should be included as a key action in the Implementation and Funding Plan. In the interim, all commercial centres identified through Spatial Plan processes or existing District Plan Centre Network maps should be included on Page 104 of the strategy.

#### **Industrial Business Land Assessment**

The Draft SmartGrowth Strategy identifies the need for a further 300 -400 hectares of greenfield business land over the next 30 years and that technical investigations have identified a number of possible locations for future business land. No further business land has been identified in the strategy for the eastern/central corridor. Te Tumu and Rangiora are already identified in “existing allocations”. The Urban Taskforce considers that 60 ha of this land needs to be brought forward. Further land is required to be identified in the eastern/central corridor such as at Wairakei South to cater for future needs, and the assessment tables on page 148 of the Strategy need to be updated.

There are significant anomalies between the Aurecon, Phizacklea Consultant’s and the Draft Strategy in terms of the identification of employment zoned land.

As well as the anomaly with the central/eastern corridor, areas such as Te Puna are absent from the Strategy. Te Puna was the overall top scoring site in the Aurecon Industrial Land Assessment. Instead of Te Puna being identified as a site for business employment land, Te Puna is identified as a “long-term growth area” well outside the strategic planning horizon. Given the Aurecon Assessment and factors such as the Tauranga Northern Link and Omokoroa Pipeline corridors, Te Puna should be included as a short and medium term growth area for business employment land. The approach of excluding Te Puna also conflicts with Marae being treated as Centres (there are 4 key Marae at Te Puna) and the need for Maori housing and employment opportunities to be created as one of the transformational shifts under the strategy identified below. This needs to be resolved through amendments to the strategy and correct interpretation of the supporting technical assessments.

#### **Industrial Strategy Review**

Beyond the identification of industrial business land capacity, there is a need to align zoning and plan provisions with the National Planning Standards. This work still needs to be completed and the review needs to involve the Bay of Plenty Regional Council to address integration between land use and the Regional Plan provisions for air and water quality. At present this is occurring in a piecemeal manner and is creating inconsistency and significant delays in delivery at the time of plan change/significant consent processes. The review needs to be based on collaboration with the



development community from conception to completion. Engaging with the development community after completion of the bulk of the work is a recipe for conflict and rework. Again, this is a key action that should be included in the implementation and funding plan.

### **Residential Land Assessment**

There is a need to deliver housing and business land in a timely and efficient manner as Tauranga is now the worst performing Tier 1 Council under the NPS-UD in terms of housing supply and housing affordability.

The Smartgrowth Strategy must adopt a more enabling and fluid policy position to enable the delivery of residential and employment land based on a corridor approach. Key actions are required such as the ability to efficiently deliver and service land with respect to infrastructure. Sound engineering solutions which enable land to be developed should be applied and feasibility assessments must be required to ensure that ultimately the development of land is feasible in order to deliver housing. These are all actions that require inclusion in the Strategy.

The “lead time to Development” identified on page 144 of the Strategy needs actions included in the Strategy to support a reduction in the development timeframes. Much of the delay is due to poor Council Plan Change and District/Regional consent processes. The need for urgent action and collaboration implicit in the Draft Strategy is not currently translated into delivery. Further actions are needed to require Smartgrowth Partners to sufficiently resource processes, and to offer fast track Plan Change and premium consent processing services. These Actions will greatly assist with the supply of land from Priority Development Areas identified in the Strategy.

Based on feedback from Urban Taskforce members, there are a number of amendments required to the short, medium and long term residential growth allocations table on page 147 of the Strategy (and associated changes to timing of infrastructure provision tables and associated staging maps) as follows:

1. Move Te Tumu 4,200 dwellings to 2027-2034, and 4,200 dwellings to 2034-2054
2. Move Tauriko West 2,000 dwellings to 2027-2034 and 1800 dwellings to 2034-2054
3. Move Keenan Road 1,000 dwellings to 2027-2034.
4. Add Wairakei south 2000 Dwellings to 2027-2034 and 2000 dwellings to 2034-2054

### **Transformational Shifts**

The Urban Taskforce agrees with the use of the transformational shifts which are identified for change and which provide guidance when implementing the strategy. The transformational shifts are identified as:

1. Homes for everyone
2. Marae’s being centres and opportunities for whenua Maori
3. Emission reduction through connected centres
4. Strong economic corridors linking the east and west to the city and the port
5. Restoration and enhancements of ecosystems for future generations
6. Radical change to the delivery funding and financing model for growth.

Although the Urban Taskforce supports the six principles relating to transformational shifts we consider that the Strategy should also incorporate a seventh shift, this being the need for further social infrastructure such as public and community amenities to be recognised. The reason for this is that there has been significant underinvestment in such infrastructure by successive Councils in Tauranga, and the city remains in “catch up mode”. The Strategy needs to address this.

#### **Funding and Financing of Growth**

The Urban Taskforce strongly supports the need for radical change to the delivery funding and financing model for growth. A range of different funding and finance models must be identified within the strategy including options for public-private partnerships. The Urban Taskforce also supports the use of the Infrastructure Funding and Finance Act with respect to the funding of infrastructure. Tauranga City Council has successfully used this Act for other projects which is a much fairer and efficient approach to infrastructure funding and one which spreads the cost over a sustained time period improving intergenerational equity and unlocking additional infrastructure investment.

Greater Central Government investment is also required to enable the development of infrastructure and further policies should be incorporated within the strategy to promote Central Government funding of infrastructure through a partnership arrangement as an important funding option.

#### **Co-operation and coordination**

Large areas of employment and residential land (such as at Te Puke and elsewhere) are unable to be unlocked due to the inability of District & Regional Council Partners to work collaboratively together on stormwater solutions. There have been many meetings between the Councils, but little in the way of outcomes. Given the housing and business land supply crisis and the critical reliance on areas such as Te Puke to deliver land supply in the short term, actions are required to be included in the strategy to require Regional & District Councils to collaborate and to reach solutions using a taskforce/working group tasked with identifying and implementing solutions to unlock such land in a timely and efficient manner.

There are many other examples across the sub-region where the Partner Councils must start working more collaboratively in a partnership role, in anticipation of amalgamation & combined services (i.e., combined water services, and a combined Regional Planning Committee) as this appears to be something the new government will encourage.

Reviewing delivery and cooperation between the Partners and their performance should also be a key requirement.

These actions should be included in the Implementation and Funding Plan.

#### **Wider Regional Cooperation & Freight**

It is important that the strategy identifies the need for regional cooperation, particularly in relation to the need for freight links (with State Highway 29 being located both within the Waikato and Bay of Plenty regions) and the role of the Port of Tauranga in New Zealand’s future. Freight volumes will only grow as the Auckland Port closes. The Port of Napier is relatively disconnected and the Port of Whangarei is geographically isolated. Freight volumes will continue to expand as will the demand for local industrial land associated with import/export and port related activities.

The Strategy should contain actions in relation to this, including a close working relationship with neighboring Councils (particularly the Waikato and Futureproof). Better/safer highways and rail for passengers and freight between the inland and coastal ports is required as an action.

In relation to employment land in the eastern Corridor, industrial zoned land adjacent to the eastern railway link needs to be properly planned as a freight feeder and distributor for the Eastern BOP and Port of Tauranga, and not be excluded from a rail connection. The current line is only at 30% capacity. An action is required to enable this in the implementation and funding plan.

Contributions to growth and infrastructure required from the Port of Tauranga should also be identified (particularly in relation to the provision of infrastructure and transport upgrades) in the implementation Plan.

#### **Decision Sought**

The Urban Taskforce seeks that amendments be made to the Draft Strategy which reflect and take into account the matters raised in our submission above.

We understand that our submission is an interim submission, and that further information will be able to be presented to the SmartGrowth Hearings Committee at the time of the hearing to be taken into account in their deliberations and decision making on the strategy.

The Urban Taskforce wishes to be heard in support of its submission and intends to expand further on the matters raised above.

Yours Faithfully



**CHAIRMAN**  
Urban Taskforce for Tauranga (UTF)

**URBAN TASK FORCE FOR TAURANGA**

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**To:**Draft SmartGrowth Strategy Submissions  
[REDACTED]

20 October 2023

**Name of Submitter:**Craig Batchelar - SmartGrowth Strategic Advisor  
[REDACTED]  
[REDACTED]**Submission: Draft SmartGrowth Strategy 2023-2073**

This is an internal submission from the SmartGrowth Strategic Advisor on the **Draft SmartGrowth Strategy** document. This submission aims to correct or update certain aspects of the Strategy that have arisen after the document was publicly notified. The content of the submission follows overleaf.

**Signed:**\_\_\_\_\_  
Craig Batchelar

SmartGrowth Strategic Advisor

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**Draft SmartGrowth Strategy: Internal Submission from SmartGrowth Partners**

Strategy Reference	Submission	Amendment Sought
Whole Strategy	Any changes required to update on matters, particularly those that are timebound, for example reflecting the decisions made on Proposed Plan Changes 33 and 92	Any amendments required to update matters in the Strategy that have changed since the document was adopted for consultation, in particular decisions on Proposed Plan Changes 33 and 92 if available
Whole Strategy	The Strategy and FDS will be approved in 2024 based on updated information. The term of the strategy should reflect this and align with the partner LTP dates.	Retitle to "SmartGrowth Strategy 2024-2074"
Whole Strategy	Any changes required following the completion of Draft Long-Term Plans and the Draft Regional Land Transport Plan that are required to the strategy so that there is good alignment.	Any changes required to align with Long-Term Plans and the Regional Land Transport Plan
Whole Strategy	There are some inconsistencies in how densities are referred to, including whether these are minimum densities or targets and whether they net or gross. These should align to the RPS definition.  We strongly encourage higher densities around centres and public transport nodes, and these should be reflected in the densities to achieve the objectives of the strategy.	Clarification throughout.
Whole Strategy	Consistency in wording when the term papakāinga is used - sometimes we talk about papakāinga <i>on Māori land</i> - but in some cases, it won't be Māori land.	Ensure that when the Strategy talks about 'papakāinga' it is broad enough so that it isn't just limited to Māori land
Whole Strategy	Minor editorial and grammatical corrections throughout the Strategy.	Minor editorial and grammatical corrections throughout the Strategy.
Foreword	Minor correction to foreword to remove specifically referencing Waka Kotahi as they are part of Central Government. Note that the foreword is likely to be updated for the final version of the Strategy.	and central Government (in particular <del>Waka Kotahi – the New Zealand Transport Agency</del> )
Part 1, Benefits of long-term planning, p 15	Minor correction – add to the benefits of long-term planning	Add 'efficient use of land' as another benefit and add 'affordable' to bullet 5.

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Part 1, Transformational Shifts, p 19	Additional text for the growth directives relating to transformational shift 2	Opportunities for papakāinga and other Māori-led housing on general land as well as whenua Māori should be included within the growth directive
Part 1, Sub-regional Context, Figure 5, p 24	The graphics in the bottom right should demonstrate how this has changed over time. This will enhance the Key Housing System Challenges identified on Page 112.	Add to the housing graphic in Figure 5 to show how home ownership has changed over time.
Part 2, The Growth Scenario, p 41	Minor correction to core concepts diagram	The summary of core concept “Access to opportunity” should specify “15-minute journey time by walk or bike ride...” to be consistent with the content on page 101.
Part 3, The Spatial Plan, Chapter 03 Climate Resilience, Introduction, page 66	The inclusion of indigenous biodiversity in the paragraph to align with other references throughout the Strategy.	Amend the second sentence of the second paragraph as follows:  To develop resilient communities, we need to ensure that reducing exposure and vulnerability to climate hazards, cutting back greenhouse gas emissions and conserving, enhancing, and restoring local ecosystems and <b>indigenous biodiversity</b> are all given the highest priorities in everyday decision making and policies on infrastructure, urban development, housing, and transport.
Part 3, The Spatial Plan, Chapter 04 – Te Taiao - Our Environment, Figure 2, page 82	Minor editorial correction	Amend top lefthand box, first and second bullet points as follows: <ul style="list-style-type: none"> <li>• TCC Nature and Biodiversity Action &amp; Investment <b>Plan</b></li> <li>• <del>Plan, Climate Change Action &amp; Investment Plan</del> <b>Biodiversity funding programmes</b></li> <li>• <b>Biodiversity funding programmes</b></li> </ul>
Part 3, The Spatial Plan, Chapter 04 – Te Taiao - Our Environment, Figure 2, page 82	Minor editorial correction	Amend middle lefthand box, first bullet point as follows: <ul style="list-style-type: none"> <li>• Structure plans - Omokoroa; Tauriko West-<del>Local spatial plan actions – Te Papa, Otumoetai, Mount Maunganui</del></li> </ul>

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		<ul style="list-style-type: none"> <li><b><u>Local spatial plan actions - Te Papa, Otumoetai, Mount to Arataki</u></b></li> </ul>
Part 3, The Spatial Plan, Chapter 04 Te Taiao – Our Environment, Map 9 Marine Natural and Cultural Areas, page 90	The Mangrove Extent 2011 layer is not clear on the map. The layer is shown as red in the key, and red/black on the map.	Amend the Mangrove Extent 2011 layer on the map to a red colour only
Part 3, Chapter 6, Urban Form and Centres, Map 12, p 109	Minor correction to Map 12	Tauranga Crossing appears to show as a 'Potential Town Centre' dot on Map 12, but table identifies it as a 'Town Centre'. Increase size of dot to match Town Centre
Part 3, Chapter 7, Housing, p 110	Add to the housing sections the work done in the Priority Development Areas	Additional text to describe work done on the Priority Development Areas
Part 3, Chapter 7, Housing, p 112	Minor additional text to clarify statement around challenges for social housing projects.	Bullet 8: Add in "the development economics in the sub-region make it challenging to deliver social housing projects <i>in some instances</i> ".
Part 3, Chapter 7, Housing, p 112	. Bullet 10: Could be enhanced with facts/statistics	Additional text – add facts/statistics
Part 3, Chapter 7, Housing, p 114	Minor additional text to emphasise density around centres and public transport hubs.	On growth directive 8, adding "....in existing urban areas and growth areas, <u>including at higher density around centres and public transport hubs</u> "
Part 3, Chapter 8, Transport, pp 115-116	Add text and graphic on the Hamilton to Tauranga Corridor initiative which has recently been completed.	Add text to the transport section of the Strategy to describe the Hamilton to Tauranga Corridor initiative. Consider including the graphic.
Spatial Plan Maps and Maps throughout document	Some existing urban areas are shown as black (for increased density and housing choice) and others are shown as grey (just existing urban areas; no mention of intensification). Minor reordering of the legend through the spatial plan maps. The planned growth areas (yellow) and potential long-term growth areas (peach) should be shown consistently across all maps	Some grey areas may be suitable for intensification. Add text to clarify that these areas can be for intensification. Legend might be better reordered, with existing urban areas first, then industry area, then planned growth areas, then potential long-term growth areas Amend maps so they are shown consistently across all (sometime shown with an outline, sometimes solid colour) Any other corrections/clarifications to the maps required.



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Part 4, FDS, Western Bay's Capacity for Growth, Page 142	Minor text change to include intensification.	First paragraph about population increasing faster than in 2021 "this means more land is needed for housing and employment". Suggest re-wording to "more capacity" instead of "more land" to cover both intensification and greenfield growth.
Part 4, FDS, Development Infrastructure, p 152	Change to development infrastructure table to remove Tauriko West Spine Road as it is funded by developers	Tauriko West Spine Road is funded by developers so should be removed
Part 4, FDS, Development Infrastructure, Footnote 15, p152	The footnote as currently worded states that all SmartGrowth partners have a strong preference for the Western Corridor transport improvements to be delivered in a single stage and in an earlier timeframe. This should be changed to say that it is the preference of the SmartGrowth council partners and Priority One.	Amend footnote 15 as follows: <i><u>The SmartGrowth council and iwi partners and Priority One have agreed there is a strong preference and need for Western Corridor transport improvements to be delivered in a single stage within a decade (by 2034) as opposed to the proposed staged delivery over many years potentially extending until 2050 given the significance of the corridor locally and nationally.</u></i>
Part 4, FDS, Map 18, p154	The intensification areas on Map 18 may need to be updated following the MDRS plan change hearings, in particular the label "Medium Density Residential to 20 metres" needs to be clarified.	Delete "to 20 metres". Update any of the intensification areas in line with outcomes from the MDRS plan changes.
Part 4, FDS, Map 18 p154	"Eastern Centre" and "Western Corridor" (Belk, Joyce, Merrick) are referred to and should be indicated (named) on the maps/graphics.	Identify Eastern Centre and other areas as appropriate, including on on Map 18.
Part 4, FDS, Map 18 p 154	Add additional text on alongside Map 18 regarding the Industrial Land Study.	Add additional text to the FDS map alongside the existing text which states: "The Future Development Areas are indicative only". Additional text to state: <i><u>"The Industrial Land Study has been undertaken using desktop information only, further investigations are required. The locations of potential industrial land as shown on the map are indicative only. For example in the Northern Corridor there are a range of long listed sites in the Apata and Ōmokoroa area for long-term consideration."</u></i>

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Part 4, FDS, Map 19 p 155	Minor Graphical Change to Map 19 where housing call out box is pointing to the wrong area.	Keenan Road pointer is pointing at the wrong area – should be pointing to the smaller green area to the south-east of Tauriko West.
Part 5 Implementing the Strategy, Partnership and Collaboration, p 161	Kiwirail should be included in the SmartGrowth partnership leadership and management framework given the long term significance of rail to urban form and transport.	Amend the Agreement and terms of reference for SLG and/or SGIG or other parts of the SG partnership framework to include KiwiRail.
Appendix 1, p 173	Suggested additional information for Western Corridor	Information or placeholders could be added for active mode network (not just Wairoa River connections to Tauriko West).
Appendix 1, p 170	Text Change given lack of detail around 'active modes' for the New Eastern Centre	"New Eastern Centre" seems misplaced in the active modes section 2035-2054. This should be expanded upon or removed.



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**COLLIER CONSULTANTS LTD**PO Box 14371  
Tauranga Mail Centre  
TAURANGA 3143  
[REDACTED]

20 October 2023

SmartGrowth Strategy

Attention: Andrew Turner (Independent Chair)

Email: [REDACTED]

Dear Andrew,

**Submission on Draft SmartGrowth Strategy 2023- 2073, Bell Road Limited Partnership**

Thank you for the opportunity to provide feedback through a submission process on the Draft SmartGrowth Strategy (Draft Strategy).

As per the advice received at the Development Sector Group on the 28th of September 2023, please accept this submission by Bell Road Limited Partnership (**Bell Road LP**) as a general summary/overview of our submission and feedback on the Draft Strategy.

It is understood that the process provides for this initial submission, with the ability to provide further technical detail in support of our submission (as well as expert evidence) at the hearing on the Draft Strategy to be held in December 2023.

**Background**

Bell Road LP is jointly owned by Bluehaven Holdings Limited (BHL) and Papamoa Ventures Limited (PVL).

BHL is part of the Bluehaven Group and is the developer of the Wairakei residential area and the subregional Centre at Wairakei, known as "The Sands". The Bluehaven Group of companies have introduced over 2,300 new houses to Golden Sands community at Papamoa, along with The Sands Town Centre, a sub-regional centre currently under development.

PVL is part of Zariba Holdings, a Tauranga Based development company with significant experience in delivering significant residential and business land within the subregion. Zariba's projects include the Terrace Views Special Housing Area, the Te Puna commercial zone and the Trustpower building/Durhan Street redevelopment in the CBD, as well as Tauriko Industrial Developments.

Bluehaven and Zariba have been actively involved in a range of planning processes over the last 20 years, including the original SmartGrowth Strategy and numerous Plan Changes including Plan Change 44 (Wairakei) and City and Regional Plan review and appeal processes.

Bell Road LP control significant land holdings in the Papamoa East area of Tauranga including circa 120 ha of land to the south of the Wairakei Urban Growth area. This land is located on the southern side

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of the Tauranga Eastern Link (TEL). The area is referred to as Wairakei South Urban Area in this submission.

Bell Road LP has been working for the past two years on master-planning and engineering assessments for Wairakei South, which expands on the existing Wairakei area by providing a further Urban Growth area at sizeable scale for both residential and employment land.

Added to the Bell Road LP land is a further circa 217 ha of land currently owned by David Hurst. Collectively the land represents 337 ha of development land, we have referred to as Wairakei South.

Wairakei South is essentially a strategic parcel of land located between the TEL interchange, bordered by Te Puke, the Kaituna River, and the existing Wairakei Urban Area. The location of Wairakei South is referred to in **Appendix (i)** - Wairakei South Urban Growth Area.

Bell Road LP's submission is in two parts.

1. The submission identifies the need for a number of general and fundamental changes required to the Draft Strategy and provides commentary on the Draft Strategy process.
2. Secondly, the submission addresses the need to incorporate Wairakei South as a future growth area/Priority Development Area to deliver much needed residential and employment land for the sub-region, and

#### **The SmartGrowth Strategy Approach**

Bell Road LP supports the intent of and need for the Draft Strategy and considers that a strong coordinated planning approach is required between the SmartGrowth Partners to refresh the SmartGrowth Strategy to plan for the future of the subregion.

The Draft Strategy in its current form has failed to provide a guiding framework to deliver the necessary housing and employment land outcomes needed for the sub-region. This situation has resulted in significant underperformance of housing and business land supply across the sub-region and an affordability crisis.

Tauranga now faces unprecedented housing and business land supply issues, and under the National Policy Statement – Urban Development (NPS-UD) a more coordinated planned and integrated approach is required to dealing with growth management.

The ineffectiveness of previous SmartGrowth Strategies has occurred due to a failure to focus on “Growth Management”, to work more closely with the development community to provide practical advice about what factors affect the feasibility of development such as land cost, construction cost, infrastructure, realistic development timeframes and robust construction methodologies.

The selective approach of “picking winners” and identifying a very narrow range of preferred sites for future growth and development was risky and problematic.

By way of example, a number of these preferred sites in the Draft Strategy are significantly constrained in terms of infrastructure, resulting in an inability to deliver housing and business land in a timely and efficient manner. The result is that Tauranga is now the worst performing Tier 1 Council under the NPS-UD in terms of housing supply.



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Bell Road LP's submission is that the Draft Strategy needs to adopt more enabling and fluid policy to enable the delivery of residential and employment land based on:

1. A corridor approach and the ability to efficiently deliver and service land with respect to infrastructure.
2. The completion of robust feasibility assessments to ensure that ultimately the development of land is actually possible, so that it can deliver housing and employment areas.
3. Sound engineering solutions which enable land to be developed.
4. All notable key areas should remain active and subject to further investigation, and therefore no short listing or preferred sites mindset should apply.

#### **Transformational Shifts**

Bell Road LP supports the transformational shifts for the region as set out in the Draft Strategy, which are as follows:

1. Homes for Everyone
2. Marae as Centres and Opportunities for Whenua Māori
3. Emissions Reduction through Connected Centres
4. Strong economic corridors linking the East and West to the City and the Port
5. Restore and enhance eco-systems for future generations; and
6. Radical change to the delivery, funding, and financing model for growth.

However, we consider that there is also a need for the inclusion of social infrastructure/public amenities to be included as a transformational shift, as there has been significant underinvestment in Tauranga.

#### **Role of Developers in the SmartGrowth Partnership**

The role of the development community (including organisations such as Bell Road LP and its Shareholders) is critical to the success of the implementation of the SmartGrowth Strategy, and there is currently very little in the way of policy directive within the Draft Strategy which requires the SmartGrowth Partners to work collaboratively with the development community.

The Draft Strategy provides limited recognition that it is actually developers that will lead the delivery of much of the strategy apart from the "lead time to development" diagram on page 144. This is the most explicit reference, but even here the developer's role is largely referred to as being related to "*subdivision and building consent*".

The reality is completely different. Developers have a significant role in long term planning, working in close collaboration with the Councils and other providers to deliver urban outcomes from the early inception of the planning process. The importance of the role of developers is also very clear in the National Policy Statement – Urban Development (NPS-UD), which requires that Tier 1 Councils must:



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1. Engage with the development sector to prepare a Housing and Business Development Capacity Assessment which can be validated.
2. Engage with the development sector and identify significant opportunities for urban development and the Future Development Strategy based on practical and real advice around what factors affect the feasibility of development, along with timeframes and infrastructure risks.
3. Seek advice from the development sector about what factors affect the feasibility of development;
4. Determine actual capacity based on commercially viable land and the relationship between costs, timing, risks and revenue.
5. Collaborate to identify and activate significant opportunities for future development.

This mandated role of developers needs to be clearly identified as a minimum in the Draft Strategy.

The Draft Strategy needs to be revised to include clear provisions that identify and recognise the significance and importance of much of the growth in the subregion being developer led, including the identification of land suitable for development and subsequent Plan Change or Fast Track consent processes for significant processes. It is noted as an example, that there is no recent track record of significant Council led plan changes in Tauranga over the last 10 years, with all significant Plan Changes being developer led.

Without developer confidence and investment, the actions from SmartGrowth are unlikely to be realised.

SmartGrowth is often criticised for its lack of delivery. There is a real opportunity to improve delivery of the Strategy through better engagement and collaboration with the development sector through several measures including:

1. The Development Sector Group being formally included in the SmartGrowth structure, with representation on the SmartGrowth Leadership Group, as it is for Tangata Whenua and Infrastructure Partners.
2. The Priority Development Areas process being one which involves engaging with developers in problem identification and resolution, at an early stage, and in a partnership role.

#### **Integrity of the Strategy**

It is critically important that the integrity of the Draft Strategy is not undermined by individual SmartGrowth partners.

In particular, background reports which identify and categorise areas suitable for employment land should be applied in the Draft Strategy based on the technical assessments completed by experts.

Similarly the feasibility (both in terms of infrastructure provision, land cost and the NPS-Highly Productive Land assessment) of residential land of the Eastern corridor needs to be properly assessed, particularly given that this is high value kiwifruit land.

Technical assessment and the public submission and review process is the mechanism by which areas should be identified or included within the Draft Strategy, through a clear and transparent process.



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### **Significance of the Future Development Strategy**

The significance of the Future Development Strategy (FDS) as a joint strategy within the overall urban growth policy system should not be underestimated.

The FDS is the primary long-term strategy on which large-scale, long-term decisions and investments are based, by both the public and private sector. The FDS effectively replaces the content of the Regional Policy Statements urban growth policy. The FDS should therefore be a very stable policy instrument.

It is implicit that where an area is identified for growth and the Smartgrowth Partners have agreed on its overall appropriateness, including the trade-offs that have been made, no growth options occur without costs or impacts being properly considered.

Feasibility is critically important and further policies are required to be included which require the economic feasibility of sites to be considered as a key consideration. For example, high value kiwifruit land to the east of Paengaroa and beyond is unlikely to be feasible to be developed for residential or employment purposes. Further policies are required in relation to the need for feasibility.

When SmartGrowth Strategy implementation occurs through RMA and other processes or systems, there should not be fundamental disagreement from any SmartGrowth Partners on the direction. The focus at that point should be on implementation, and not the Strategy itself.

### **Commercial Strategy Review**

It is essential that the Commercial Strategy Review<sup>1</sup> be completed on a sub-regional basis to achieve a consistent outcome. This work is long overdue and needs to be completed by Tauranga City Council and prioritised

The indicative Connected Centres Strategy as set out is inadequate and further urgent work is required on this. The review needs to be based on collaboration with stakeholders from inception through to completion, including engaging the development community and tangata whenua, and also taking into account completed spatial plans.

Engaging with the development community after completion of the bulk of the technical work will miss key information and opportunities and is a recipe for future conflict and rework.

This engagement should be included as a key action in the Implementation and Funding Plan. In the interim, all commercial centres identified through spatial plan processes or existing City or District Plan Centre Network maps should be included.

### **Employment Land Assessment**

The Draft Strategy identifies the need for a further 300-400ha of greenfield business land over the next 30 years and that technical investigations have identified a number of possible locations for future business land within the Eastern growth corridors.

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<sup>1</sup> Page 104 of the SmartGrowth Strategy





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The Draft Strategy notes that:

*“through more detailed desktop analysis, Omokoroa, Belk Road, and Pukemapu have emerged as the preferred potential locations to provide for business land in the northern and western growth corridors.”<sup>2</sup>*

No further business land has been specifically identified in the draft Strategy for the Eastern/Central corridors. Te Tumu and Rangiuru are already identified in “existing allocations” These areas are excluded from the further 300-400ha required.<sup>3</sup>

The primary basis for the Employment Land assessment is the Aurecon Industrial Land Study completed in June 2023.

It is noted that there are significant anomalies between the Aurecon Industrial Land Study, Phizacklea Consultants Supplementary Study, and the Draft SmartGrowth Strategy in terms of the identification of Employment Zoned land. The reports show inconsistency of findings. By way of example, sites such as the overall top scoring sites of Te Puna (Aurecon Study) is completely absent from the Draft Strategy and is instead identified as a “long term” growth area, well outside the Strategic planning horizon.

This approach also conflicts with the approach of Marae being treated as centres and the need for Maori Housing and employment opportunities to be created as one of the transformational shifts under the Strategy.

#### **Industrial Strategy Review**

Beyond the identification of industrial capacity is the need to align zoning and plan provisions with the National Planning Standards and these include:

1. Mixed use zone
2. Light industrial zone
3. General industrial zone
4. Heavy industrial zone
5. Port zone
6. Airport zone
7. Special purpose Zone

The review needs to involve the Bay of Plenty Regional Council to address integration between land use and their regional plan provisions for air and water quality.

At present this is occurring in a piecemeal manner and creating inconsistency and significant delays in delivery at the time of plan change/significant consents. The review needs to be based on

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<sup>2</sup> Page 149 of the SmartGrowth Strategy

<sup>3</sup> Page 148 of the SmartGrowth Strategy



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collaboration with the development community from conception to completion. Engaging with the development community after completion of bulk of the work is a recipe for conflict and rework.

Again, this is a key action that should be included in the Implementation and Funding Plan.

#### **Wairakei South Urban Growth Area**

Wairakei South Urban Growth Area (Wairakei South) lies within a strategic area bordered by the Wairakei residential development, the Kaituna River, and Te Puke and the TEL.

The Draft Strategy identifies the Wairakei South land as “Ottawa 2”. The site is the highest scoring site (Aurecon Industrial Land Study) identified in the Eastern/Central Corridor (with a raw score of 54 and a weighted score of 7.415) This study postdates the Phizacklea Consultants report dated May 2023.

The Aurecon report assesses the site as follows:

*The Domain Road 1 and 2, Tara Road 1 and 2, and Ottawa 1 sites (the site) is located towards the eastern edge of Tauranga City and straddles the boundary of TCC and WBOPDC. The Site is elongated and runs along the Tauranga Eastern Link (TEL), south to Bell Road and the Te Puke Highway, and west towards Bruce Road. The Site is near Papamoa, and the outer extents of the Te Puke area, in close proximity to multiple community facilities such as the Papamoa Library, and local schools and kura. The Site is largely zoned as Rural, with a large portion of the Site subject to a flooding overlay. The Site is also intersected by the East Coast Main Trunk Line railway. This Site fits strategically within the identified freight routes, the existing SmartGrowth growth areas, and the Te Puke growth area of the UFTI report. The most obvious development focus would be on the western land parcels adjacent to TEL (SH2) and Papamoa (Domain Road) interchange, providing easy access and connectivity to priority freight route and PT, and better quality land in terms of flooding and geotechnical characteristics.<sup>4</sup>*

The Aurecon report also noted for the Central Corridor (Domain Rd 1 and 2, Tara Rd 1 and 2, and Ottawa:<sup>5</sup>

*This combined area along the Eastern Link and taking in Domain Road, Tara Road, and Bell Road, was selected with the intent to identify and recommend the more suitable areas within this larger combined area for industrial land development. It is located centrally and has attractive transport and other connectivity benefits; however some significant land quality and capability constraints are evident, including proximity to coast with potential flooding and coastal inundation risks.*

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<sup>4</sup> Page 51 SmartGrowth Industrial Land Study, Aurecon 2023

<sup>5</sup> Page 51 SmartGrowth Industrial Land Study, Aurecon 2023



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These flooding, coastal inundation risks and land quality constraints do not relate to the Ottawa 1 land as The Bell Road LP have confirmed engineering solutions to address flooding, building platform levels and the preloading of sites.

Wairakei South (previously referred to as Ottawa 2) was identified by Aurecon as having a yield of 600-650ha (assuming 70% nett developable yield from the gross site area due to the TEL through the spine and other land quality constraints including stormwater management). The area identified for business land is shown in Appendix (i).

Bell Road LP has been liaising with the three Council's through its planning processes in relation to the Wairakei South land. Wairakei South has not properly been identified within the Draft Strategy. No provision has been made for Wairakei South in the short, medium and long-term table of housing supply assessment.

Below is a summary of the work completed to date and the benefits of including the Bell Road LP site in the Strategy:

- The initial development focus is on employment and industrial zoning, but otherwise is a mixed-use approach.
- Preliminary flood modelling and mitigation has been completed by DHI and Lysaght Consultants.
- Geotechnical, Ground Engineering and Contamination assessments have been completed by Golders, LDE and Engeo Consultants.
- Wairakei South can feasibly be developed and relative to other investigation land areas, is superior in most development criteria. The assessment of the land in the Aurecon Industrial Land Assessment confirms this position also. Further detail is outlined in the table below.
- Bell Road LP has a clear intention to develop.

Further analysis of the land provided under the Aurecon industrial land study criteria is included in the table below:

KEY AREAS	SPECIFIC CRITERIA ELEMENTS	FURTHER COMMENTS
Land	Capability, quality & sustainability	<ul style="list-style-type: none"> <li>• Relatively low (net) fill requirements.</li> <li>• Good Geotechnical and ground conditions.</li> <li>• Low land cost.</li> <li>• The site can be developed at scale.</li> <li>• Initial flood modelling concludes the area can be developed as there is sufficient land to provide for attenuation.</li> <li>• Natural hazards can be appropriately mitigated through landform</li> </ul>
Environmental	Considerations and consenting	<ul style="list-style-type: none"> <li>• Current rural zoning / activity.</li> <li>• Limited productivity or economic output.</li> <li>• The land does not contain High value productive soils.</li> <li>• There are no wetland or ecological features.</li> </ul>



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KEY AREAS	SPECIFIC CRITERIA ELEMENTS	FURTHER COMMENTS
		<ul style="list-style-type: none"> <li>Stormwater management areas provide significant ecological benefits.</li> </ul>
Infrastructure	Servicing and proximity to transport	<ul style="list-style-type: none"> <li>Immediate access to State Highway and local road network via the Planned Papamoa East interchange.</li> <li>Good water and wastewater connection options including a servicing corridor under the TEL.</li> </ul>
Fit	Strategic & market	<ul style="list-style-type: none"> <li>Superior location with immediate access to large population which builds on and is an extension to the Wairakei urban area.</li> <li>The development aligns with the “connected Centres” approach (including a connection to Te Puke and the existing Wairakei Centres).</li> <li>There is a strong relationship with and alignment with The Sands sub-regional centre, which is under development.</li> <li>The land is controlled by a single ownership entity.</li> <li>Utilising the Papamoa East Interchange strongly aligns with the SmartGrowth strategies corridor approach to the provision of industrial land and with the UFTI Connected Centres principles to support a live, work, play and learn approach with employment opportunities close to where people live, reducing vehicle travel and carbon emissions.</li> </ul>
Te Ao Maori	Mana/Tangata Whenua	<ul style="list-style-type: none"> <li>No Marae are impacted.</li> <li>No sites of cultural significance are identified on the land</li> </ul>

Bell Road LP seeks that Wairakei South be included in the Business Employment Land assessment in the strategy on page 149 through the following changes.

- Include 100ha of employment land in the 2027-2034 (medium term) and 45ha of employment land in the 2034-2054 (long term) planning periods.

Bell Road LP seeks that as well as employment land, provision for dwellings should be incorporated in the short, medium and long term residential growth allocations table on page 147 of the strategy as follows:

- Add Wairakei South 2,000 dwellings to 2027-2034, and 2000 dwellings to 2034-2054

The Future Development Strategy Staging Map (Map 18) on page 154 should also be updated to provide for Wairakei South (and associated changes necessary to timing of infrastructure provision tables and associated staging maps).



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**Conclusions**

Bell Road LP support the Smartgrowth Strategy but a number of changes are required to more appropriately embed the role of developers in the Strategy. A number of amendments and additions are required to be made to the Strategy as set in Bell Road LP's submission above to ensure the success of the strategy in appropriately managing future growth.

Wairakei South must be included in the Strategy as a new growth area for both Residential and Industrial.

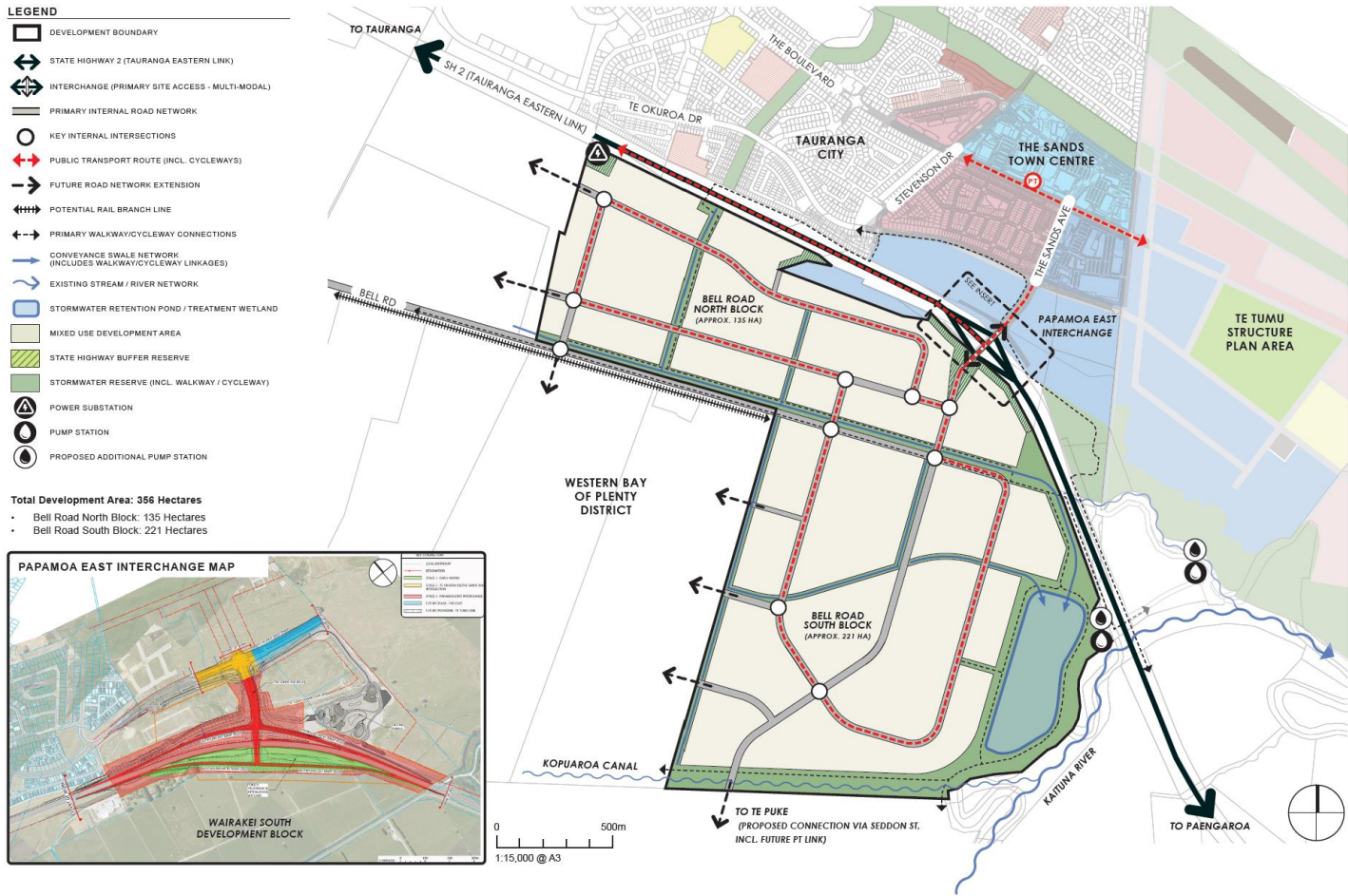
Yours faithfully,

A handwritten signature in blue ink, appearing to read 'A. Collier', is written over a light blue horizontal line.

**Aaron Collier**  
Director/Planner



Appendix (i) – Wairakei South Urban Growth Area



**A submission to:** SmartGrowth Partners  
haveyoursay@westernbay.govt.nz

**On:** The SmartGrowth Strategy 2023-2073 – Draft for Consultation

**From:** Bill McMaster

**Contact:** [REDACTED]

**Date:** 20 October 2023

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### Background

- 1.1 My name is Bill McMaster and I am a resident at 47A Te Ngaio Road, Mount Maunganui. My family has been resident at Mount Maunganui since around 1915.
- 1.2 Whilst I have worked as a regional planner specialising in transport planning over my working career my interest in SmartGrowth is in a private capacity where I am seeking the best possible growth outcomes for the Western Bay of Plenty region.

### Summary

- 1.3 Thank you for the opportunity to submit on the Draft SmartGrowth Strategy 2023-2073.
- 1.4 Overall I applaud the SmartGrowth partners in producing a thorough, informative and well-presented Strategy that will serve the sub-region well over the next 50 years.
- 1.5 I support the Future Development Strategy and the overall implementation and funding plan.
- 1.6 This submission seeks that the SmartGrowth partners communicate with Tauranga City Council, as a key SmartGrowth partner, seeking TCC to remove the high density residential proposals from the Mount Maunganui North area which are included in TCC Plan Change 33 until the SmartGrowth partners have had an opportunity to assess what this development will do in terms of providing excess housing numbers in the Western Bay of Plenty sub-region and assess the adverse impacts of this proposed development on Western Bay of Plenty infrastructure implementation planning (and assessed in the SGS Implementation and Funding Plan).

### Detailed Comments

- 1.7 I strongly support the SmartGrowth Strategy (SGS) as the pre-eminent growth management strategy for the Western Bay of Plenty sub-region.
- 1.8 I support the fact that the SmartGrowth (SG) partners have collectively produced a 30 year Strategy that sets the strategic vision and direction for the growth and development of the sub-region. This shows real leadership and a willingness of the partners to agree a plan for future growth.
- 1.9 I support the integration of land use and infrastructure within the SGS.
- 1.10 I support the Vision of the SGS *“Western Bay – a great place to live, learn, work and play”*.



- 1.11 I support the four well-beings and subsequent objectives of Environmental, Cultural, Social and economic.
- 1.12 The SGS proposes 6 transformational shifts for change which I support. The first shift seeks 'Homes for Everyone' and it is around this shift my submission is based.
- 1.13 My concern as outlined in this submission is not with the content and direction of the SGS. My concern is that one of the SG partners, Tauranga City Council (TCC), has produced a Plan Change, PC33, which runs contrary to the SGS.
- 1.14 The corridor approach outlined on Pg27 of the SGS states that within the Central Corridor residential intensification, business and community facilities are sought in the Te Papa Peninsula and this has been identified through the Te Papa Spatial Plan. Within the Central Corridor it also states support for quality urban growth within Otumoetai and Mount Maunganui (no mention of residential intensification in these two areas).
- 1.15 The SGS outlines the Growth Scenario on Pg41 which envisions a population of 400,000 by 2073 and outlines 2 core concepts of 'urban intensification' and 'access to opportunity'.
- 1.16 Part 3 of SGS outlines the Spatial Plan which identifies areas for growth and areas to protect. I would suggest that the SGS should recognise the iconic nature of Mount Maunganui North as an area to be protected from high density intensification and seek to retain the generally low rise nature of this area.
- 1.17 Chapter 6 Urban Form and Centres (Pg101) is an important Chapter as it outlines where and when growth will occur in the western BOP sub-region. Mount Maunganui is identified as a Town centre with a Net Target (dwelling per hectare) of 30 to 50 dwellings.
- 1.18 It is accepted that through the National Policy Statement – Urban Development (NPS-UD), which PC33 is seeking to address, some level of medium density residential development can and should occur at Mount North.
- 1.19 The proposed expanded Mount Maunganui Precinct (Mount North) however is an entirely unsuitable location for high density residential intensification and there are other locations in Tauranga much better suited such as the TePapa Peninsula. This will be borne out of the SGS is completed.
- 1.20 Both Transport (Chapter 8) Three Waters and Other Infrastructure (Chapter 9) will be significantly impacted by TCC proposed Plan Change 33 which will increase dwellings significantly in Mount North without any assessment of the impacts on transport, three waters and other infrastructure. This is out of line with the SGS objectives and implementation plan and could place considerable extra expenditure on the subregion to fund infrastructure improvements. This could compromise the SGS wider Western Bay priorities for infrastructure spend.
- 1.21 Within the SGS a Case Study looks at the Otumoetai Spatial Plan (Pg108). This Spatial Plan sets out a 30 year vision for the Otumoetai peninsula and provides direction on where growth will occur between now and 2050. This Spatial Plan assumedly provides significant guidance for SG partners when preparing the SGS.
- 1.22 The Mount to Arataki Spatial Plan, currently under development, does not follow the SG guidance on local area spatial plans. Consideration of density and building scale is a core consideration for liveability. The Mount to Arataki Spatial Plan should be prepared under SG guidance and provide the strategic guidance for growth and infrastructure

development to inform both the SGS and PC33. The Mount to Arataki Spatial Plan as it is currently written is flawed as it does not identify growth areas and intensification.

- 1.23 Chapter 11 Economic Wellbeing (pg134) – I applaud the recognition in Chapter 11 of the Western Bay being a key location in the Upper North Island freight and logistics network, especially to serve access to the Port of Tauranga, the largest port in the country. I encourage strong liaison and co-operation with Waikato and Auckland partners to ensure that transport links between Tauranga, Hamilton and Auckland, both road, rail and maritime, are enhanced. Joined up regional land transport plans are critical to the development of all three regions and will ensure best possible bids are prepared for Central Government funding for this UNI region. Mutual projects such as SH1 and SH29 improvements on the SGS Western Corridor are vital to ensure efficient transport links are achieved.
- 1.24 Part 4 Future Development Strategy (pg 140). It is recognised that the Future Development Strategy (FDS) chapter forms the FDS part of the NPS -UD required under the Act. The purpose is to show areas for development over the next 30 years and infrastructure needed to support it. The FDS is supported by the SG Housing and Business Capacity Assessment 2022.
- 1.25 The Market Economics report<sup>1</sup> tabled as part of PC33 evidence states that the proposed Council new height and density provisions enable approximately 497,590 more dwellings through PC 33 for the Tauranga area.
- 1.26 The SmartGrowth Housing and Business Capacity Assessment 2021<sup>2</sup> (HBA) estimated that between 37,000 and 43,000 new homes will need to be built to keep up with demand in the western Bay of Plenty sub-region over the next 30 years (Pg 142). Of this Tauranga is projected to require another 30,000 to 34,000 new houses over the next 30 years.
- 1.27 The table on Pg 143 shows a shortfall in development capacity of 1,620 or 7,930 houses across the sub-region.
- 1.28 TCC's PC 33 is enabling significantly more dwellings than what is currently needed for Tauranga's forecast growth, as identified through the SGS. This means that PC33 is out of sequence with the SGS and must be disputed by the SG partners.
- 1.29 Tauranga City Council's required housing numbers in PC33 are overstated and high density intensification at the Mount is not required to achieve the requisite SGS housing numbers and must be very low priority.
- 1.30 The SGS on pg 143 identifies that TCC has found that its proposed expenditure programme over the 2024-34 period is unsustainably large from a fiscal and delivery perspective. This will require a reduction in the programme for investment to support housing intensification. This has implications for when new development capacity will become available
- 1.31 The table on page 147 outlines the proposed dwelling allocations over the next 30 years to support the connected centres programme. Tauranga City has an allocation of 11,400 to 15,000 dwellings between 2024 to 2054.

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<sup>1</sup> Statement of Evidence of Lawrence Ryan McIlrath – para 3.8 (part of Sec 42a Report)

<sup>2</sup> <https://www.smartgrowthbop.org.nz/categories/housing>

- 1.32 Map18 on page 154 of the SGS outlines the FDS Staging Map – Mount North is not identified with an orange dot as High Density Residential apart for the existing area of the High-Rise zoned for part of Mount Maunganui.
- 1.33 Part 5 Implementing the SGS. It is noted in this part of the SGS that the Implementation and Funding Plan (IFP) will be developed as a separate document and updated annually. It is not part of the FDS under the NPS-UD.
- 1.34 It is submitted that the TCC PC33 proposal on high density at Mount North be fully costed under the IFP to assess whether the SM partners are in a position to be able to fund the infrastructure components relating to the increased dwellings allowed under the PC33 Mount North high density intensification proposals.

**Conclusion**

- 1.35 This submission seeks that the SmartGrowth partners communicate with Tauranga City Council, as a key SG partner, seeking TCC to remove the high density residential proposals from the Mount Maunganui North area which are included in TCC Plan Change 33 until the SmartGrowth partners have had an opportunity to assess what this development will do in terms of providing excess housing numbers in the Western Bay of Plenty sub-region and assess the adverse impacts of this proposed development on Western Bay of Plenty infrastructure implementation planning (and assessed in the SGS Implementation and Funding Plan).

**FEEDBACK BY TAURANGA CROSSING LIMITED  
ON THE DRAFT SMARTGROWTH STRATEGY 2023-2073**

**TO:** SmartGrowth

**NAME:** Tauranga Crossing Limited (“TCL”)  
PO Box 2529, Shortland Street, Auckland, 1140

**FEEDBACK ON:** Draft SmartGrowth Strategy 2023-2073

**Introduction**

1. TCL is the owner and operator of a regional shopping centre (“**Tauranga Crossing**”) and large format retail centre (“**Lifestyle Centre**”) located at 2 and 31 Taurikura Drive, respectively. TCL is a leading shopping centre company that has carefully designed and planned Tauranga Crossing and the Lifestyle Centre to establish a high-quality retail and services environment for the Bay of Plenty region.
2. TCL has undertaken a staged approach to the development of its retail centre. The first two development stages of Tauranga Crossing are now complete, and resource consent is held for the construction of Stage 3, which is scheduled to begin in the next 12 months. This will result in a total retail gross floor area of 64,242 m<sup>2</sup> being provided on the site, together with parking for 1,993 private vehicles.
3. Stage 1 of the Lifestyle Centre opened in 2018 and further stages are being planned. When complete, the Lifestyle Centre will include a Gilmours wholesale, 14,442 m<sup>2</sup> gross floor area of bulky goods and large format retail stores, and a 3,900 m<sup>2</sup> supermarket, together with at-grade parking for 675 vehicles. Upon completion, Tauranga Crossing is expected to be one of the 10 largest shopping centres in New Zealand, illustrating the importance of this centre to the Bay of Plenty region.
4. TCL welcomes the opportunity to provide feedback on the draft SmartGrowth Strategy 2023-2073 (“**the Strategy**”) for the western Bay of Plenty sub-region. The Strategy sets the strategic vision and direction for the growth and development of the sub-region and includes a Future Development Strategy (“**FDS**”) as required under the National Policy Statement of Urban Development (“**NPS-UD**”).

**Feedback**

5. A large amount of growth needs to be accommodated within the Western Bay of Plenty sub-region. The Strategy provides for an urban structure that could accommodate a population which is expected to grow from 220,000 to 290,000 by 2052, and potentially to 400,000 in the next 50 years, in a manner that ensures

existing and future residents have access to a choice of homes and a range of employment opportunities.

*Anticipated growth in the Western Corridor*

6. The “Western Corridor” is identified by the Urban Form and Transport Initiative (“UFTI”) as a “Key Growth Area” over the next 30 years, and includes Tauriko West, Keenan Road, and the Tauriko Business Estate. Some 3,500 greenfield dwellings are planned for Tauriko West (2024-2054), and a further 2,000 greenfield dwellings are planned for Keenan Road (2034-2054).
7. Tauranga City Council in its evidence on Proposed Plan Change 33 has identified that an additional 1.5ha of commercial provision is required at the Tauranga Crossing Centre by 2033 to accommodate this predicted growth, and 3.1ha by 2043.<sup>1</sup> The Strategy anticipates<sup>2</sup> that employment within the “Western Corridor” will increase by 46% (from 8,900 in 2024 to 13,000 in 2054). This is compared to an anticipated increase of employment within the “CBD and Central Corridor” of 40%, the “Eastern Corridor” by 32%, the “Northern Corridor” by 23%, and “Mount Manganui” by 20%. Tauranga Crossing and the Lifestyle Centre will provide and support significant employment opportunities for people living in the Western Corridor growth area.
8. Given the anticipated urban growth in the Western Corridor, TCL’s activities are also key to ensuring that the Western Corridor has convenient and sustainable access to goods and services. This is fundamental to the delivery of a well-functioning urban environment – a core objective of the NPS-UD.

*Commercial Centres Strategy*

9. Building on the UFTI delivery plan for a “Connected Centres” settlement vision for the sub-region, the Strategy provides an indicative centres strategy to reflect the requirements of the National Planning Standards 2019 (“NPS”).
10. The NPS introduces a standardised hierarchy of centres,<sup>3</sup> comprising the:
  - (a) City centre zone, being *Areas used predominantly for a broad range of commercial, community, recreational and residential activities. The zone is the main centre for the district or region.*
  - (b) Metropolitan centre zone, being *Areas used predominantly for a broad range of commercial, community, recreational and residential activities. The zone is a focal point for sub-regional urban catchments.*

<sup>1</sup> Statement of evidence of Tim Heath (Economics) on behalf of the Tauranga City Council (dated 24 August 2023) at [4.5].

<sup>2</sup> Pg 136; SmartGrowth Strategy Draft for Consultation 2023.

<sup>3</sup> Zone Framework Standard; National Planning Standards; November 2019.

- (c) Town centre zone, being *Areas used predominantly for... in larger urban areas, a range of commercial, community, recreational and residential activities that service the needs of the immediate and neighbouring suburbs.*
  - (d) Local centre zone, being *Areas used predominantly for a range of commercial and community activities that service the needs of the residential catchment.*
  - (e) Neighbourhood centre zone, being *Areas used predominantly for small-scale commercial and community activities that service the needs of the immediate residential neighbourhood.*
11. In order to support the “Connected Centres” programme, the Strategy proposes a commercial centres strategy as follows:
- (a) The Regional and City Centre of Tauranga Central Business District will provide for:
    - a. a broad range of commercial, community, recreational and residential activities, intended to service the needs of the region; and
    - b. building heights and density of urban form to realise as much development capacity as possible, to maximise the benefits of intensification.
  - (b) The Town Centres of Waihi Beach, Katikati, Omokoroa, Bethlehem, Fraser Cove, Greerton, Cameron Road Centre, Tauranga Crossing, Mt Maunganui, Bayfair, Papamoa, Wairakei – The Sands, and Te Puke, to provide for:
    - a. a range of commercial, community, recreational and residential activities, intended to service the needs of the immediate and neighbouring suburbs; and
    - b. building heights and densities of urban form density within a walkable catchment that is commensurate with the level of commercial activity and community service.
12. Although it is acknowledged that the classification of centres may be subject to change following the outcomes of plan changes to the Tauranga City Plan and Western Bay of Plenty District Plan (and that further work is required in terms of developing a detailed sub-regional commercial centres strategy), it is important that the direction in the Strategy appropriately reflects the intended role and function of each centre in the sub-region. The Strategy once finalised will become an important document that will have an influence on other resource management processes in the future.

*Classification of Tauranga Crossing as a Town Centre in the Strategy*

13. TCL disagrees with the proposed commercial centres strategy and the lack of distinction between the size, scale, and catchment of the centres. The Strategy has only identified City Centres, Town Centres, and potential town centres, which does not reflect the current or future reality of the commercial centres in the region. As such, the Strategy does not appropriately support the “Connected Centres” programme or appropriately implement the requirements of the NPS-UD,

or the NPS. It will potentially hinder development potential and well-functioning urban environments as discussed further below.

14. The NPS-UD requires a shift in thinking when planning for urban growth. In creating well-functioning urban environments, it is no longer efficient to have a “flat” hierarchy with the city centre at the top, followed by town centres. Rather, Objective 3 of the NPS-UD requires greater enablement of urban intensification in areas which have many employment opportunities, or are well-served by public transport, or where there is high demand for housing or for business land in the area. This requires a clear framework to be put in place to direct urban intensification to appropriate locations to support planned growth.
15. The NPS-UD also encourages a nuanced hierarchy of development around urban centres (Policy 3, Policy 4). By not differentiating between metropolitan centres, town centres, and other types of centres, the Strategy does not encourage the “Key Growth Area” centres to grow to meet their potential. This is a lost opportunity to create a more efficient development pattern and does not align with the general objective and policy direction in the NPS-UD. A more nuanced centre hierarchy is required to allow each type of centre to grow according to its unique potential, role, and catchment.
16. While TCL acknowledges that the Strategy identifies that “further work is required in terms of developing a detailed sub-regional commercial centres strategy” that will form part of the Implementation Plan supporting the Strategy, the Implementation Plan is not part of the FDS and is not subject to the consultation and engagement requirements of the Local Government Act 2002; nor does not have the effect of an FDS when Councils are preparing or changing RMA planning documents.
17. Given the emphasis of the NPS-UD on the importance of well-functioning urban environments and efficient development patterns, and the fact that Bay of Plenty sub-region is governed by two territorial authorities, it is essential that the Strategy and the FDS set an appropriate hierarchy of centres that includes city centres, metropolitan centres, town centres and other centres, based on factors such as the existing and intended future scale, function, and catchment area.
18. Without this, there is a risk of inefficient or disjointed plan making, which could result in missed opportunities to effectively leverage infrastructure investments, optimise land uses, and create well-functioning urban environments.

*Tauranga Crossing should be a Metropolitan Centre*

19. As set out above, TCL disagrees with the proposed commercial centres strategy and the lack of distinction between the size, scale, and catchment of the centres. The Strategy currently identifies Tauranga Crossing as a “Town Centre” for the purposes of the commercial centres strategy. The NPS describes the Town Centre Zone as:



Areas used predominantly for:

- in smaller urban areas, a range of commercial, community, recreational and residential activities.
- in larger urban areas, a range of commercial, community and recreational and residential activities that service the needs of the immediate and neighbouring suburbs.

20. TCL disagrees with this classification and firmly considers that Tauranga Crossing is a Metropolitan Centre as that term is defined in the NPS:

Areas used for predominantly for a broad range of commercial, community, recreational and residential activities. The zone is a focal point for sub-regional urban catchments.

21. Tauranga Crossing services more than the “needs of the immediate and neighbouring suburbs”, servicing a retail catchment that stretches across the southern half of Tauranga and the wider communities of Western Bay of Plenty and even into the Waikato.
22. Tauranga Crossing is located at the intersection three major transport routes (SH29, SH29A, and SH36) and will be serviced by a public transport hub located within the centre. Waka Kotahi’s commuter information (based on the 2018 Census dataset) confirms that 1,833 people travel to Tauriko for work and school. People travel to Tauriko from 59 different areas, including from within the sub-region (including Kaimai, Waiarohi, Minden, and Te Puke).
23. The “Western Corridor” is also serviced by “sub-regional social infrastructure”<sup>4</sup> and the location of Tauranga Crossing enables it to service both the “Western Corridor” and the greater Western Bay of Plenty sub-region in a manner that is consistent with the NPS definition of a Metropolitan Centre Zone (above).

#### **Relief sought**

24. Given that the purpose of a town centre is limited to serving both immediate and neighbouring suburbs (as opposed to a sub-regional catchment), TCL considers that the Strategy and FDS represent a significant constraint on the function and future growth of the Tauriko commercial area and the “Western Corridor” in general. TCL seeks that the Strategy recognise the significant role Tauranga Crossing will play in supporting planned growth within the “Western Corridor” and the region generally, and identify it as a metropolitan centre in the Strategy.
25. TCL also considers that consequential changes are necessary to incorporate metropolitan centres to other “Key Growth Areas” and to ensure that the remaining town centres, local centres, and neighbourhood centres are better defined throughout the Strategy and FDS.
26. TCL wishes to speak to this feedback at any hearing of the Strategy.

<sup>4</sup> Pg. 133; SmartGrowth Strategy Draft for Consultation 2023

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**Dated** 20 October 2023

**Signature** by its planning and resource  
management consultants and  
authorised agents Bentley & Co. Ltd.

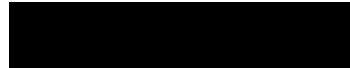


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Mark Arbuthnot

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## NGĀI TUKAIRANGI HAPU SUBMISSION TO THE SMARTGROWTH STRATEGY 2023-2073



<b>Submission on:</b> SmartGrowth Strategy 2023 – 2073	
Name of Organisation	Ngāi Tukairangi Hapu Trust
Name and role of submitter (if on behalf of organisation)	Tui Henry – Resource Management Project Co-ordinator
Key Contact	Tui Henry
Postal Address	81 Doncaster Drive Papamoa
Telephone number	
Email Address	
Date	17 October 2023

**Introduction**

Ngāi Tukairangi hapū are descendants from the paramount chief of Tauranga moana, Te Rangihouhiri. We descend directly from his son, Tapuiti. Ngāi Tukairangi is a Ngāi Te Rangi hapu. The rich history and whakapapa of Ngāi Tukairangi extend far beyond the confines of Matapihi, encompassing a vast and diverse area within the Tauranga region. Our ancestral connections stretch from Te Papa to Otumoetai, Mount Maunganui, and down into Arataki, Matapihi, forming a significant presence in this expansive sub-region. We have also held domain as far as Rotoehu Forest, Waikare in Papamoa and some of the inner area near Poripori. Whilst our hapū is predominantly based in the inner city of Tauranga, Mount Maunganui, Matapihi and Whareroa today<sup>1</sup>, our influence and heritage permeate across this broader landscape. Despite our widespread presence, there exists a tendency to pigeonhole Ngāi Tukairangi solely into the identity of Mount Maunganui, overlooking the depth and breadth of our historical and cultural footprint. Acknowledging the full scope of our influence, heritage, and connections is essential. By embracing the entirety of our ancestral domain, we honour the resilience and adaptability of Ngāi Tukairangi, celebrating the profound impact we have had and continue to have across the Bay of Plenty, through our connections to other Mataatua whanaunga. It is our collective

<sup>1</sup> This is directly as a result of the impact of colonisation and the raupatu that impacted our tribal footprint.

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responsibility to ensure that our hapū's legacy and contributions are accurately represented and respected, fostering a deeper understanding of our identity and significance within the wider community.

The interconnectedness of Ngāi Tukairangi and Ngāti Tapu within the shared domain of Matapihi, bound together by our common iwi of Ngāi Te Rangi, is a testament to the enduring strength of our cultural heritage. Both hapū stand united in our aspirations, values, and the way we engage with Council and other local bodies. These shared principles find embodiment in the Ngāi Tukairangi and Ngāti Tapu Hapū Management Plan, which serves as a guiding beacon for our collective endeavours.

Central to our shared vision are the core values of kaitiakitanga, manaakitanga, whakawhaunangatanga, and kotahitanga. Upholding these values is not only a commitment but a sacred duty passed down through generations. They serve as the foundation upon which we navigate our interactions with local authorities and shape the future of our communities. In embracing these values, we are not only preserving our cultural legacy but also actively contributing to the broader community. Through kaitiakitanga, we safeguard our land and resources for future generations. Manaakitanga guides our interactions, ensuring respect and understanding prevail in all engagements. Whakawhaunangatanga fosters relationships not just within our hapū but with the wider community, emphasizing collaboration and mutual respect. Kotahitanga unites us, reinforcing the strength that comes from standing together in the face of challenges.

Ngāi Tukairangi hapū representatives are relieved to finally have a small resource to enable feedback on the SmartGrowth Strategic Plan 2023-2073. Acknowledging the Bay of Plenty's status as one of the fastest-growing regions, we recognise the inherent challenges posed by this growth. More residents mean more considerations around accommodation and the necessity for new initiatives. Our hapū is deeply committed to ensuring that our unique perspective and concerns are not only acknowledged but genuinely heard and taken into account. The decisions made regarding accommodation, infrastructure, and initiatives directly influence our community and, by extension, our whānau. We firmly believe that meaningful engagement with our hapū is essential to developing strategies that are culturally sensitive, sustainable, and inclusive. The new plan should provide for opportunities where Ngāi Tūkairangi can thrive alongside the future growth initiatives that are being implemented within our rohe.

We have prepared a summary submission sheet to assist with navigating through the information formed in the Smartgrowth strategy. It is important that given the limited capacity we have, we have focused on our primary areas of interest at this point. Those submission issues relate to 01. Areas to be protected and developed carefully, 03. Climate, 05. Rural, 08. Transport, 09. Three waters and other infrastructure, and Part 5. Where the points are not referred to, we reserve the right to be able to discuss further their impact during the overall submissions process.

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**Conclusion**

In essence, our aspirations reflected in this submission is a testament to our dedication to preserving our cultural heritage, safeguarding our environment, and ensuring the well-being of our whānau and future generations. Through collaboration, understanding, and respect, we move forward, embracing the challenges and opportunities, shaping a sustainable, inclusive, and vibrant Matapihi for all.

**NGAI TUKAIRANGI HAPU SUBMISSION AREAS**

	<b>Ngāi Tukairangi Hapū Response:</b>	<b>How the SmartGrowth Strategy can be improved:</b>
<b>01. Areas to be protected and developed carefully</b>	<b>1A. Māori communities</b> Development of Māori land blocks have too many barriers such as lack of infrastructure, funding, and ability to develop land. For example, access to power, water, roading etc.	<b>1A(1).</b> Needs improvement OR support. Provide opportunities for Māori communities to be able to develop land in a way that suits the needs of tangata whenua.
<b>03. Climate resilience</b>	<b>3A.</b> Ngāi Tukairangi hapū fully supports SGS's commitment to ongoing research projects and the continual updating of data related to environmental and climate effects. This dedication to accurate findings ensures that communities can stay informed about the conditions of their living areas and the effects of the environment and climate. We appreciate the efforts made to keep the community informed and empowered with knowledge.	
	<b>3B. Emergency response:</b> With the current impact and effects of climate change, it is imperative to plan ahead and develop strategies to mitigate against the effects of climate change within all areas we are associated with. In particular, Whareroa and Matapihi are particularly vulnerable to the adverse effects of climate change, including rising	<b>3B(1).</b> The Whareroa and Matapihi community needs to be prepared for emergencies that may disrupt our water supply. The SGS can play a crucial role in supporting the installation of emergency water storage systems to ensure a safe and reliable water source during times of crisis. This could include rainwater harvesting systems, water tanks, a

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	sea levels, changing weather patterns, and increased frequency of extreme weather events. To adapt, it is imperative to invest in resilient infrastructure, develop early warning systems, and support community-led initiatives that enhance our ability to withstand climate-related challenges. Additionally, there is a need for comprehensive disaster preparedness plans that are culturally sensitive and inclusive of mātauranga Māori.	reservoir and other infrastructure to safeguard our community's water needs in the face of climate-related challenges.
	<b>3C. Waste management:</b> Waste management is a significant aspect of our community's sustainability efforts. Implementing a robust recycling and composting program is essential. By reducing our waste, recycling materials, and composting organic matter, we can significantly decrease our carbon footprint. Having efficient systems in place also ensures self-sufficiency and sustainability within the Matapihi community.	<b>3C (1).</b> The SGS can support Ngāi Tukairangi in establishing and promoting these programs, providing education and resources to encourage active participation from residents. By doing so, we can minimise landfill waste and promote a circular economy that conserves resources and mitigates the impacts of climate change.
	<b>3D. Effects of erosion:</b> As Whareroa and Matapihi sit adjoined to inner harbour elements, we are prone to the effects of erosion. Some of the areas that are susceptible to erosion in Matapihi include Te Tii urupa, Otumoko urupa and Omanu urupā. Other known areas along the Matapihi peninsula include Oruamatua, Te Ngaio and other historical pa sites. Priority for restoration should focus on urupā to ensure that desecration of gravesites does not occur. Whareroa in particular is	<b>3D(1).</b> Ngāi Tukairangi should be supported in the replanting of those banks, as well as planting of native plants/trees along the banks to reduce the risks of erosion on our whenua. We should also be able to proactively advance our own ideas in relation to erosion efforts.

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	subject to erosion with the dissipation of sand on the shoreline.	
	<p><b>3E. Hapū driven initiative:</b></p> <p>Ngareta Timutimu, a Ngāi Tukairangi descendant has progressed an initial project to address climate control projects within the older areas of the Mauao/Matapihi peninsular and the respective communities. The initiative taken by whānau to assess the local takutai, focusing on the impacts of climate change such as erosion, rising sea levels, and their effects on the foreshore and kaimoana, demonstrates a proactive approach to understanding and mitigating environmental challenges.</p>	<p><b>3E(1).</b> The SGS can provide support by offering expertise in environmental impact assessments, providing data-driven insights into erosion patterns and rising sea levels, and suggesting innovative solutions. The SGS can assist in developing comprehensive climate adaptation strategies tailored to the unique challenges faced by Ngāi Tukairangi hapū in Matapihi. Collaborative efforts under the SGS and Ngāi Tukairangi hapū can lead to the creation of holistic, culturally sensitive climate resilience programs. By combining traditional knowledge with modern scientific approaches, we can develop initiatives that not only protect our environment but also preserve our cultural heritage and sustain the livelihoods of our community.</p>
<b>05. Rural</b>	<p><b>5C. Matapihi rural status:</b></p> <p>Matapihi's designation as a rural area was a deliberate choice advocated by our whānau and community members, aimed at safeguarding our rural character and preventing extensive urban expansions or residential subdivision projects. Preserving this rural identity is paramount to maintaining our community's integrity. However, this intentional rural status poses a challenge when it comes to implementing essential infrastructure improvements necessary to accommodate the burgeoning population within Matapihi.</p>	<p><b>5C(1).</b> Through the SGS, we can work collectively to develop tailored solutions that cater to our growing needs while respecting the rural character we hold dear. This might involve advocating for specific exemptions or modifications within the rural zoning regulations, allowing for targeted infrastructure improvements without compromising our rural integrity.</p>



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	The fundamental question that arises is: How can Matapihi balance the preservation of our rural status with the urgent need for adequate infrastructure to support our growing population? It is imperative that we find innovative and strategic solutions to address this dual objective effectively.	
	<p><b>5A. The significance of Marae centres:</b></p> <p>In many Māori communities, the marae serves as a central focal point where our whānau gather, especially during times of crisis, a fact notably highlighted during the challenging periods of COVID-19 lockdowns. Our marae/hapu communities, in response to the pandemic, consciously isolated themselves from the broader Bay of Plenty community for safety. During this period, it became apparent that our marae, while deeply valued, lacked essential resources and support to cater effectively to the needs of our whānau. It was a crucial realisation, as it underscored the necessity of bolstering our marae with adequate services and resources. Identifying these deficiencies was pivotal, illuminating the path forward. To truly empower and uplift our whānau within Matapihi, it is imperative that our marae be equipped with the essential services and resources required to fulfill the aspirations of our whānau, ensuring that our marae remains a resilient and supportive cornerstone for our community.</p>	<p><b>5A(1)</b> Provide for adequate response plans and practical resources for marae centres. Marae often play a huge manaaki role in times of crisis for ALL communities.</p>

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	<p><b>5B. Māori health clinic:</b></p> <p>An example of this challenge lies in the accessibility of adequate health services for our whānau in Matapihi. A fundamental aspiration of Ngāi Tukairangi is to eliminate the need for our whānau to travel extensively to receive general healthcare. It is disheartening to observe that some of our kaumātua must journey as far as Greerton to access health services from a Māori clinic. Despite the absence of readily available health services within Matapihi, the community is fortunate to have a health education service in place. However, considering the burgeoning population, there exists an urgent need for comprehensive healthcare solutions within Matapihi.</p>	<p><b>5B(1).</b> In this context, the invaluable support under the SGS becomes pivotal. We urge Councils to actively facilitate and empower Ngāi Tukairangi in establishing our own Māori health clinic within Matapihi. This endeavor is essential to ensuring that our well-being is perpetually prioritised. By creating a local healthcare facility, we aim to not only provide essential medical services but also foster a sense of belonging and security within our community. The establishment of a Māori health clinic in Matapihi represents a transformative step towards self-sufficiency and well-being, aligning perfectly with our enduring commitment to the holistic welfare of our people.</p>
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08. Transport	<b>8A. Promoting sustainable transportation:</b> Ngāi Tukairangi hapū stands firmly behind the SGS's initiative to curb private vehicle reliance by promoting alternative transportation methods. Recognising that Tauranga boasts the highest private vehicle usage rates in the country, coupled with the lowest public transport adoption, underscores the urgency of this endeavour. We are acutely aware of the detrimental impact vehicles have on air quality and carbon emissions. We wholeheartedly commend the SGS's proactive measures in navigating this challenge, all for the greater good of our environment.	
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	<p><b>8B. Traffic/road improvement projects:</b></p> <p>The rapid growth of the Bay of Plenty region necessitates constant upgrades to its roading and traffic systems, particularly in the bustling Mount Maunganui and Arataki area. The recently initiated Hewletts Rd flyover project is a case in point. While these major roading projects aim to alleviate congestion, they have a direct impact on the day-to-day traffic flow in Matapihi. The community of Matapihi faces a unique challenge due to its singular entry and exit point, linking up to a major roundabout.</p> <p>We are steadfastly against the imposition of carpark meters in the Mount Maunganui area. The devastating impact of parking charges is evident in the Tauranga CBD, and we oppose their imposition in our other rohe. In addition, we are concerned with the overzealous impact of multiply user interests on our roadways, including cyclists, buses, traffic, parking and so forth. The impact is messy, and devastating for businesses.</p>	<p><b>8B(1).</b> This situation highlights a pressing concern regarding traffic flow within Matapihi. Given the community's singular route in and out, it is imperative that the Matapihi community's needs and concerns be prioritised in the Council's considerations during discussions surrounding such roading projects. The impact of these projects on our daily lives, accessibility, and overall well-being cannot be overstated. Consequently, it is essential for Council's to continue to actively engage with the hapū and the Matapihi community, seeking our input and feedback to ensure that any roading developments align with our community's requirements.</p>
	<p><b>8C. Matapihi shared pathway:</b></p> <p>The issue of cycling safety within Matapihi, as outlined in our Hapū Management Plan, is also of concern. Currently, the absence of a separate cycleway within Matapihi necessitates the use of shared pathways with pedestrians. This shared pathway, serving as the primary route from the Bayfair area to Te Papa, is heavily utilised by cyclists commuting to and from</p>	<p><b>8C(1).</b> Critical considerations must be made regarding the adequacy of the shared pathway. This assessment includes evaluating the availability of sufficient lighting to ensure the safety of cyclists, especially during low-light conditions. Moreover, the congestion on the pathway sometimes compels cyclists to use the road, posing hazards both to them and to vehicles. This situation necessitates urgent</p>

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	work. However, the question arises: is the existing shared pathway adequate to accommodate the volume of traffic it sustains?	<p>measures to guarantee the safety of all individuals using these routes.</p> <p>To address these challenges, comprehensive strategies through the SGS must be implemented. This includes the installation of adequate lighting along the shared pathway, enhancing visibility and ensuring safe passage for cyclists during darker hours. Moreover, exploring options for widening the pathway can help alleviate congestion and reduce the temptation for cyclists to use the road.</p>
<b>09. Three waters and other infrastructure</b>	<p><b>9A. Power grid infrastructure:</b></p> <p>Ngāi Tukairangi firmly supports our whānau in establishing papa kainga within our respective communities at Whareroa marae and also Hungahungatoroa marae, and within the respective wider Matapihi land-blocks, recognising the cultural and familial significance of these developments. To enable our whānau to realise their vision of papa kainga on their whenua, it is essential to ensure that the appropriate infrastructure is in place to support these developments effectively. Power grids stand out as a critical infrastructure required for housing developments, including papa kainga. The pertinent question that arises is whether the current power grid system in our rohe has the capacity to accommodate future papa kainga developments for our whānau. Alternatively, will our whānau require additional</p>	<p><b>9A(1).</b> The SGS can facilitate the implementation of necessary enhancements. This might involve expanding the grid's capacity, integrating renewable energy sources, or adopting innovative smart grid technologies to ensure both efficiency and sustainability.</p>

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	infrastructural support in the form of an upgraded power grid to cater to the anticipated growth?	
	<b>9B. Water systems and infrastructure:</b> The thoughtful consideration given to power grid infrastructure is equally applicable to our water systems and existing water infrastructures within Matapihi. It is our understanding that Whareroa is able to access town water supply.	<b>9E(1).</b> The pressing question emerges: are the current water infrastructures robust enough to accommodate the envisioned growth associated with future papa kainga developments for our whānau? Alternatively, is it imperative for the SGS to support Matapihi in enhanced and more advanced water infrastructures to effectively cater to this anticipated expansion? This would entail the implementation of improved water treatment and distribution technologies, expanding the capacity of existing systems, and adopting sustainable water management practices. Moreover, integrating innovative solutions such as rainwater harvesting, greywater recycling, and efficient irrigation systems can contribute significantly to water conservation and sustainable usage within the community. These practices align with our commitment to kaitiakitanga and the preservation of our wai māori.
<b>Part 5. Partnership and collaboration</b>	<b>5A.</b> Ngāi Tukairangi hapū endorse SGS's dedication to fostering cohesive collaboration with their partners and tangata whenua across diverse projects and commitments. We recognise the complexity of engaging numerous stakeholders throughout the Bay of Plenty region, and we are genuinely appreciative of the efforts made in this regard thus far.	Continue to ensure Ngāi Tukairangi hapū are partnered in discussions about any developments within our rohe.
<b>Funding</b>	Ngāi Tukairangi hapū lack capacity and capability to input into the myriad of planning strategies in our	Funding for the development of a spatial / environment management plan

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	<p>rohe. We propose to secure funding of \$250,000. This is a significant step toward fostering a synchronized approach within Matapihi. This initiative aims to align various efforts and initiatives under a unified strategy that truly represents the aspirations of Ngāi Tukairangi hapū. The ultimate objective is to create a Matapihi-led, Matapihi-driven approach that addresses the unique challenges faced by our community. The proposed funding will be instrumental in developing a comprehensive spatial plan and hapū environment management plan. These plans will serve as foundational documents, outlining a cohesive vision for Matapihi's future. By investing in these strategic frameworks, we empower our hapū to assert control over our own destiny and preserve our cultural heritage in the face of environmental challenges. In seeking this funding, we aim to position our hapū as the drivers of change, taking proactive steps toward environmental preservation, climate adaptation, and community resilience. The proposed spatial plan and environment management plan will reflect the unique identity and aspirations of Matapihi, serving as a testament to the strength and unity of Ngāi Tukairangi hapū.</p>	
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23rd October 2023

Submission on: SmartGrowth Strategy 2023 – 2073

Name of Organisation	Ngāi Tukairangi Ahu Whenua Trust
Name and role of submitter (if on behalf of organisation)	Lorin Waetford, Policy Analyst
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Telephone number	
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### Ngāi Tukairangi Ahu Whenua Trusts' submission on the SmartGrowth Strategy 2023 – 2073

Tēnā koe,

Ngāi Tukairangi Ahu Whenua Trust (the Trust) emerged from the challenges our hapū was facing at the hand of rapid urbanisation surrounding the Matapihi peninsula. After numerous land blocks were confiscated from Ngāi Tukairangi through the Public Works Act for the city's development (Port of Tauranga and the Airport), the Trust was led by Turirangi Te Kani into a plan of retaining and developing the land for future generations. As well as to create an economic buffer to protect our ancestral lands from further confiscation.

In the 1980s, under the Māori Affairs Act, 8 whānau-owned land blocks were amalgamated and put into development by the Trust. Our first kiwifruit vines were planted in 1982, and the first crop was harvested in 1985. Since then, our Trust has grown exponentially, moving beyond our wāhi kainga of Matapihi and into other regions across Te Ika-a-Maui. We are now the owners and leaseholders of orchards across Kerikeri, Matapihi, Te Puke, Gisborne, and Hawkes Bay which (combined) grow kiwifruit, apples, blueberries, persimmons, and mandarins. Our continued success is attributed to our highly skilled and experienced team as well as the foresight of our tupuna who planted those first vines.

#### Introduction

The Trust welcomes the opportunity to provide comments on the SmartGrowth Strategy 2023 – 2073 (SGS). It comes as no surprise to read the predicted growth for the sub-region and over the years we have aspired to improve working relationships with councils so that our mana whenua and mana moana is not superseded in the planning for such growth. The Trust is continuing to work alongside our whānau working in the Ngāi Tukairangi Hapū Trust (Hapū Trust) so that we are all able to understand the plethora of changes happening at a district, regional and national level.

### Ngāi Tukairangi and Ngāti Tapu Hapū Management Plan 2014 & Mount to Arataki Spatial Plan

In 2014, the Ngāi Tukairangi and Ngāti Tapu Hapū Management Plan (HMP2014) was commissioned with the assistance of Tauranga City Council and Bay of Plenty Regional Council (BOPRC). The HMP2014 was initiated to be utilised as an active planning tool that reflects the tikanga of our hapū regarding cultural, environmental and resource management matters within Matapihi and our wider hapū boundaries. Hapū management plans play a crucial role in council urban planning and are vital for ensuring the inclusion of Māori perspectives, interests, and priorities. These plans encourage collaboration between local councils and hapū and are often more likely to produce outcomes that are acceptable to both parties, leading to more effective and less contentious urban development. Hapū management plans also ensure a more inclusive and Te Tiriti o Waitangi-centric decision-making model exists, supported by a formal engagement structure, recognising the role of hapū in local governance.

The HMP2014 is nearly ten years old, and since that time significant changes have occurred in and around Matapihi as well as within the wider Ngāi Tukairangi hapū boundaries. Amongst environmental degradation, regulatory changes, infrastructure upgrades (Bayfair flyover, Hewlett's Road/Maunganui Road upgrades), we have also been through a pandemic and subsequent lockdown. These changes paired with a rapidly increasing climate related events have highlighted a clear need to revise and update the plan to ensure it remains relevant and effective. And that it responds to the kind of challenges we have endured in the last ten years. Updating the HMP2014 will not only align it with the current needs and priorities of our community but it will also enhance the ability to protect our cultural heritage, sustainably manage resources, promote economic and social development, and prepare Matapihi to be climate resilient and a civil defense hub.

This year, the Trust alongside the Hapū Trust and other mana whenua groups have been working on the TCC lead Mount to Arataki Spatial Plan (MSP). As we understand it, the MSP is a smaller scale plan that seeks to address the predicted growth for the Mount North to Arataki area. The SGS speaks to similar challenges and aspirations as the MSP, just at a grander sub-regional level. Tāngata whenua have a deep and enduring connection to the whenua, the moana and everything in between. These values, mātauranga and perspectives need to play a significant role in shaping land-use and development decisions. Like hapū management plans, spatial planning can enable the recognition of cultural, environmental, and economic interests, aligned with Te Tiriti o Waitangi and in support of hapū aspirations for sustainable development and self-determination.

The Trust would like to highlight that it would have been more appropriate of both the SGS and MSP to engage with hapū first around whether a program of hapū management plan renewal could be conducted beforehand. We acknowledge that both projects have acknowledged existing planning documents, furthermore UFTI also commissioned a

report on 'Tāngata Whenua perspectives on Growth Management'. These efforts, however, are not quite the same as tāngata whenua being able to determine for themselves, within their own dedicated plans what growth management will need to look like for them. There is also the issue of engagement fatigue which is a very real issue facing hapū and Māori land trust representatives. hap

#### Submission comments:

The Trust would like the SGS to better fund an implementation programme that assists hapū in the sub-region to develop their own spatial plans, or revise and update existing planning documents. There also needs to be better alignment with other planning projects so as to relieve some of the engagement fatigue felt by hapū, Māori land trust representatives and other members.

Why has the tāngata whenua spatial plan not been completed and presented for feedback? The Trust would consider this should have been done first considering the visual representation in the SGS consultation book of it sitting above, and feeding into the SGS.

#### **Freshwater quality, allocation and use**

Within urban planning, freshwater resources play a critical role in ensuring the sustainability, health and liveability of cities. Proper management and consideration of freshwater resources are essential for addressing the water needs of urban populations, protecting the environment, and promoting resilience in the face of challenges like climate change. Within our orchard business, the Trust is undergoing going work to understand the different regional challenges for our orchards, with special consideration given to freshwater quality, allocation and use. Water is fundamental to our orchard operations, and without adequate access to water our business is simply not viable. The impacts of such would be detrimental to our ability to provide cultural, social, economic and health support to our whānau through financial assistance. There are also numerous other considerations that must be incorporated into urban planning processes to help cities effectively manage and protect freshwater resources such as

1. Drinking water supply
2. Wastewater and stormwater management
3. Sustainable water use
  - a. Water conservation, efficient irrigation, reclaimed water for non-potable purposes.
4. Ecosystem conservation
5. Integrated land-use planning
6. Climate change resilience
7. Public education
8. Emergency preparedness

#### Submission comments:

Does the SGS consider how the implementation of Te Mana o te Wai and the National Policy Statement for Freshwater Management (NPSFM) may be constrained with the predicted urban growth? The Trust would also be interested in a collaborative approach to understanding how the sub-regions Māori land trusts with horticultural/agricultural/energy interests (dependent on freshwater) could be impacted by restricted access because of urban growth.

#### **Highly-productive Land**

Highly productive land (HPL) is important in a planning context for several reasons, as it plays a crucial role in supporting various aspects of economic, environmental and social well-being. Planning that recognises and preserves HPL can lead to sustainable development and positive outcomes. Balancing the need for urban development with the preservation of productive land is essential for achieving sustainable and resilient communities that can thrive economically, protect the environment as well as its inhabitants.

#### Submission comments:

The importance of HPL can not be overstated, and the Trust would like to see more resources made available, especially for tāngata whenua investing in development projects, to understand the impacts of incorrect land use. Following the recent storms and the event of Cyclone Gabrielle, there is an obvious issue with previous land use and planning instruments across the country and the SGS is an opportunity to plan appropriately.

#### **Property development opportunities**

Being involved in commercial property development can offer a number of opportunities to tāngata whenua to participate in economic development, wealth creation, and the preservation of cultural sites. Māori land trusts have shown they can play a significant role in commercial property development by utilising whenua Māori and resources to generate income, support community development, and promote economic self-sufficiency. The Trust has been able to successfully do this through horticulture, but with the supply of HPL dwindling, it is imperative the Trust is looking for ways to diversify their portfolio and venture into other investments.

#### Submission comments:

The Trust would be very interested in identifying opportunities where they could invest in commercial property development that aligns with the economic needs and goals of Matapihi and our wider hapū boundaries. We would also consider how we could work with commercial property developers, working within our hapū domain, on the design principles and any potential cultural references.

#### **Collective feedback from tāngata whenua sessions**

The Trust wishes to express thanks to [REDACTED], Kai Arahi – Tū Pakari for hosting three workshops in preparation for this submission. As such, feedback was circulated with some of the key points raised. One such point that [REDACTED] made in her collective feedback response that particularly resonated with the trust was this;

***“If you do not receive much feedback on the draft Strategy from tāngata whenua, it could be more of an indication of a lack of capacity rather than a lack of interest or concern”***

The Trust was significantly pressured to get a submission together that articulately spoke to the 180 page document. We have endeavoured to provide our initial comments as well as reiterate some of the comments from the circulated feedback document that we support.

#### Feedback about sub-regional growth

- How can we manage growth and provide for houses for others, when we can't currently and adequately provide homes for our own?
- Increasing the supply of housing/rentals is good but it needs to cater for the range of needs, especially lower income households.
- The SmartGrowth Strategy needs to ensure that Māori are not left further behind.
- We need to ensure that manuhiri are not prioritised over mana whenua.
- We need affordable rentals and homes in urban areas as well as the ability to build on our whenua.
- Do we have sufficient capacity within the natural environment to handle more people? Is there sufficient water supply for a growing population? We need to ensure our waterways and aquifers are kept healthy and not stressed by over abstraction.
- Need to ensure a whole systems approach, from maunga ki te moana.

#### Feedback about the draft strategy

- The consultation process on the draft Strategy was too short.
- Strategy implementation is critical and needs to be resourced well.
- Support reference CTWF outcomes and proposed Marae Centres and Māori Land Development Focus. SmartGrowth needs to ensure that this is adequately funded so that it is as successful and results in tangible outcomes for our people. Need to build capacity and capability within tāngata whenua to ensure success is long-lasting.
- Resource consent processes need to be streamlined. We want to be able to respond quickly to the growing needs of our whānau, especially those who can't afford to rent/buy and to enable those who want to move home.
- Map 2c – there is discomfort that archaeological sites and HAIL sites are on the same map. There is no need for them to be displayed together.

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### Final comments

There is a need within the sub-region to better prepare hapū, iwi, marae and Māori land trusts for the expected growth. The Trust believes that when councils and other stakeholders are preparing for this growth, they need to also ensure Māori are able to prepare their own communities too. Not after councils, but leading into or alongside.

The Trust would like to speak to this submission during the hearing sessions.

Nāku iti noa,



Lorin Waetford | Policy Analyst

[Redacted contact information]

Ngāi Tukairangi Trust | Matapihi Office

[Redacted contact information]

[ngaitukairangitrust.co.nz](https://ngaitukairangitrust.co.nz)

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**COLLIER CONSULTANTS LTD**PO Box 14371  
Tauranga Mail Centre  
TAURANGA 3143  
[REDACTED]

20 October 2023

SmartGrowth Strategy

Attention: Andrew Turner (Independent Chair)

Email: [REDACTED]

Dear Andrew,

**Submission on Draft SmartGrowth Strategy 2023 on Behalf of JWL Investment Trust**

Thank you for the opportunity to provide feedback through a submission process on the Draft SmartGrowth Strategy (Draft Strategy).

As per the advice received at the Development Sector Group on the 28th of September 2023, please accept this submission by JWL Investment Trust (**JWL**) as a general summary/overview of our submission and feedback on the Draft Strategy.

It is understood that the process provides for this initial submission, with the ability to provide further technical detail in support of our submission (as well as expert evidence) at the hearing on the Draft Strategy to be held in December 2023.

**Background**

JWL is a property trust independently administered in Tauranga. JWL are active in residential and commercial land development and have invested in a number of commercial and residential sites throughout the City over many years. JWLs portfolios include the Gate Pa Town Centre which is currently identified as a Town Centre and provides a key role in the Te Papa Spatial Plan and the Cameron road corridor.

**Gate Pa Town Centre and the Te Papa Spatial Plan**

The Gate Pa Town Centre is a successful retail Centre located in the central part of Tauranga on the eastern side of the Cameron Road corridor between Gate Pa and Tauranga Hospital. The Gate Pa Town Centre is described in detail in the Council's spatial plan<sup>1</sup> for Te Papa, and is identified as a Town Centre in the Spatial Plan.

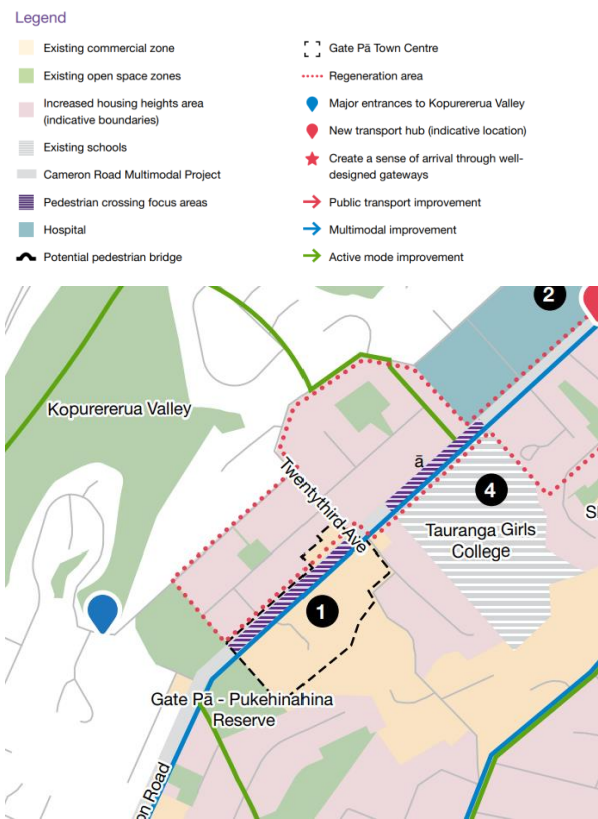
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<sup>1</sup> The Te Papa Spatial plan was adopted by TCC in September 2020, and JWL were active participants in the Spatial Plan process.



A key action of the Spatial Plan is to allow for provision for higher density (up to 6 story’s) within a walkable distance of Gate Pa Town Centre<sup>2</sup>. The Spatial Plan notes that for Pukehinahina/Gate Pa, this will provide a greater choice of housing and employment opportunities for people of all ages and abilities and an increase in provision of market housing, social housing and affordable housing and living options<sup>3</sup>.

A new transport hub is proposed within the Gate Pa Centre/hospital and an action for Tauranga City Council is to develop a gateway to the town Centre and a rapid transit stop along Cameron Road<sup>4</sup>. based on the Spatial Plan, the Gate Pa Town Centre offers significant opportunity for further commercial and residential development. This is anticipated to occur in conjunction with the public transport upgrades which are a key component of the Spatial Plan. The extent of the Gate Town Centre from the Spatial Plan is shown in Figure 1 below:



<sup>2</sup> See page 44 of the Te Papa Spatial Plan.  
<sup>3</sup> See pages 45-47 of the Te Papa Spatial Plan.  
<sup>4</sup> See page 44 of the Te Papa Spatial Plan.

**1 Gate Pā town centre**

- Improve design and amenity to create an attractive and safe environment that encourages people to stay longer. Consider as part of the Tauranga City Plan review of commercial centres.
- Develop rapid transit bus stops along Cameron Road.
- Develop a green corridor connection from the Gate Pā/Pukehinahina town centre to Merivale.
- Improve visual and physical connection of Gate Pā Reserve and include historic and cultural references.
- Provide opportunity for mixed-use residential/commercial developments in commercial areas in the future that support local community needs.

Figure 1: Gate Pa Centre (Te Papa Spatial Plan).

**Commercial Strategy**

JWL supports the intent of and need for the Smartgrowth Strategy. It is essential that the Commercial Strategy which forms part of the Smartgrowth Strategy, takes into account and is not inconsistent with, the work which has been recently completed to plan for Tauranga City's growth and intensification. In particular, the Te Papa Spatial Plan.

JWL requests that amendments be made to the Draft Strategy. The Centres Strategy (Page 104 and associated maps) needs to be updated to refer to Gate Pa Town Centre in the list of Town Centres. This amendment takes into account the matters raised above and correctly reflect the important Town Centre role and status of Gate Pa under the Te Papa Spatial Plan.

We understand that our submission is an interim submission, and that further information will be able to be presented to the SmartGrowth Hearings Committee at the time of the hearing to be taken into account in their deliberations and decision making on the Strategy.

JWL Investment Trust wishes to be heard in support of its submission and intends to expand further on the matters raised above at the hearing.

Yours faithfully,



**Aaron Collier**  
Planner/Director

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P 64 9 590 6000  
F 64 9 589 2310  
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Rebecca Eng

20 October 2023

SmartGrowth Strategy 2023 Consultation  
SmartGrowth  
306 Cameron Road  
Tauranga

By email c/- [administration@smartgrowthbop.org.nz](mailto:administration@smartgrowthbop.org.nz)

To whom it may concern,

**SmartGrowth Strategy 2023 Consultation: Transpower Feedback**

This feedback has been prepared by Transpower New Zealand Limited ("Transpower") in relation to the SmartGrowth Strategy 2023 including a Future Development Strategy ("SmartGrowth Strategy").

**The National Grid**

Transpower is the state-owned enterprise that plans, builds, maintains, owns and operates New Zealand's high voltage electricity transmission network, known as the National Grid, that carries electricity across the country. The National Grid connects power stations, owned by electricity generating companies, to substations feeding the local networks that distribute electricity to homes and businesses. The National Grid is critically important and nationally significant infrastructure that is necessary for a reliable and secure supply of electricity throughout the country and that, in turn, supports national, regional and sub-regional growth.

Transpower needs to efficiently operate, maintain, upgrade and develop the National Grid to meet increasing demand; to connect new generation; and to ensure security of supply, thereby contributing to New Zealand's economic and social aspirations. For this reason, Transpower has a significant interest in the development of an effective, workable and efficient SmartGrowth Strategy where it may affect the National Grid.

The National Grid is nationally significant infrastructure by virtue of the National Policy Statement on Electricity Transmission 2008 ("NPSET"). The NPSET confirms the national significance of the National Grid and provides policy direction to ensure that decision makers under the RMA:

- recognise the benefits of the National Grid;
- manage the adverse effects on the environment of the National Grid;
- manage the adverse effects of third parties on the National Grid; and
- facilitate long term strategic planning for transmission assets.

Further, the National Grid falls within the National Policy Statement on Urban Development 2020 (“NPSUD”) definition of “additional infrastructure”<sup>1</sup> which means that the SmartGrowth Strategy must spatially identify the National Grid in terms of its role in servicing development capacity and the general location of the corridors and other sites required to provide it.

**Appendix A** describes Transpower and the National Grid, including a full list of the National Grid assets within the SmartGrowth Strategy area. Being directly relevant to the preparation of a Future Development Strategy, Appendix A also includes further details on the higher order policy context established by the NPSET (and a copy of the NPSET itself).

#### **Transpower Western Bay of Plenty Development Plan (WBOP Development Plan)**

It is widely understood that the Western Bay of Plenty region is growing. Its electricity infrastructure needs to grow too, to ensure power is available when and where people and businesses need it. Transpower and Powerco are working together to plan and deliver the essential upgrades on the electricity network that are needed in the sub-region. This is a long-term programme with delivery spanning over the next 10 years. Consultation was recently completed on the first phase of work, which set out the need for upgrades, technical assumptions, and possible options for upgrades on the high voltage transmission network. Upgrades are required to support both projected population growth and electrification of the economy. Transpower’s early work with Powerco indicates that the demand for electricity across the sub-region will increase by at least 60%, but potentially up to 90% by 2035. By 2050, demand could be as much as 145% above what it is today.

Further consultation is planned in 2024 on a short-list of options following feedback from the first round of consultation, and further technical investigations and analysis. The intention is that this consultation will provide solution options for the public to consider. It will include work that both Transpower and Powerco would need to undertake on their transmission and distribution networks respectively.

#### **Future Development Strategy**

At the outset, Transpower is grateful for the opportunity to provide feedback on the SmartGrowth Strategy and supports its outcomes in principle. That said, aspects of the SmartGrowth Strategy need to be reviewed and updated to ensure that it meets the requirements for FDSs as set out in the NPSUD.

In reviewing the SmartGrowth Strategy Transpower has been guided by SmartGrowth’s obligations for preparation of an FDS set out in Subpart 4 “Future Development Strategies” in the NPSUD. The section “What is SmartGrowth” states on page 10: *“In 2021, SmartGrowth began work on a Joint Spatial Plan. This Plan was put on hold so that it could integrate with a wider update of the SmartGrowth Strategy as a whole. This updated Strategy includes a future development strategy as required under the National Policy Statement on Urban Development.”* This means that the SmartGrowth Strategy is required to include and be informed by specific matters set out in sub-part 4 of the NPSUD. Transpower’s comments on these matters are captured under the sub-headings below.

#### **What FDSs are informed by (NPSUD Section 3.14(1)(f))**

Section 3.14(1) of the NPSUD states that *“every FDS must be informed by the following...(f) every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement.”* While the SmartGrowth Strategy includes a description of the “National context” including some national direction at page 29, the “Requirements” for spatial planning set out on page 47 do not include the NPSET in the “National environmental requirements”. Under the RMA there is no hierarchy between national policy statements (NPSs). This means that the NPSET has equal weight alongside the other NPSs listed in terms of informing the SmartGrowth Strategy and fulfilling the requirements of an FDS under the NPSUD. Transpower observes that the SmartGrowth Strategy doesn’t appear to have been clearly informed by the policy direction within the NPSET and wishes to see this addressed in the final version.

The NPSET is also relevant in terms of the role that the National Grid will play in the electrification of the economy, both with regard to protecting existing assets, and enabling the construction of new connections to renewable energy and sources of demand. Both concepts are relevant to development and implementation of the SmartGrowth Strategy.

<sup>1</sup> “Additional infrastructure” is defined by the NPSUD and means:...(f) a network operated for the purpose of transmitting or distributing electricity or gas.”

Transpower seeks that the Strategy is updated to not only reference the NPSET as a relevant national policy statement under the RMA on page 47, but also that it demonstrates how the SmartGrowth Strategy has been informed by the policy direction contained within the NPSET. A logical starting point for this would be on page 57 “National environmental requirements.”

#### **Purpose and content of FDS (NPSUD Section 3.13)**

This section sets out (among other matters), the purpose of an FDS and the matters that a FDS must spatially identify. In particular:

- 3.13(2)(a)      the broad locations in which development capacity will be provided for over the long term, in both existing and future urban areas, to meet the requirements of clauses 3.2 and 3.3.**

Transpower is neutral regarding the principle of urban intensification and growth areas but considers it essential to show the existing National Grid on specific maps to ensure that the development capacity is correctly informed by the National Grid corridor policy direction set out in the NPSET. See further detailed comments in relation to the “constraints on development” core content requirement below.

- 3.13(2)(b)      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.**

Transpower supports the reference to power supply on page 124, including the statement that “*Power supply faces similar issues given strong population growth and increased power demand...there is an ongoing need to address reliable power supply issues in light of increased power demand driven both by population growth and electrification and decarbonisation of transport and industry.*” This statement reflects the preamble of the NPSET which states that ongoing investment in the transmission network and significant upgrades are expected to be required to meet the demand for electricity and to meet the Government’s objective for a renewable energy future, therefore strategic planning to provide for transmission infrastructure is required. It also reflects the themes identified in the WBOP Development Plan.

That said, the SmartGrowth Strategy does not include an assessment of the extent to which electricity supply is sufficient to support development, or recognition of the potential for transmission infrastructure to expand in the future to support electrification. With regard to electricity transmission, Transpower is happy to provide any required information to enable the details of electricity supply to be discussed and recorded accurately, including as necessary to ensure that the WBOP Development Plan demand scenarios align with those in the SmartGrowth Strategy.

A final observation with regard to this requirement is that the assessment does not clearly articulate how *all* “additional infrastructure” has been considered in the context of servicing development capacity.

- 3.13(2)(c)      any constraints on development**

Transpower has concerns with the constraints assessment because it omits existing National Grid assets in the sub-region, which presents a clear constraint on development. This is by virtue of the NPSET which includes a strong policy direction against the establishment of sensitive activities in proximity to the National Grid, along with those activities which may compromise the National Grid. The SmartGrowth Strategy constraints assessment does not address this despite the direction in Sections 3.14(1)(f) and 3.13(2)(b) and (c). Transpower suggests that there are at least two key actions required to address this in the SmartGrowth Strategy, which will require amendments to the SmartGrowth Strategy itself and the supporting technical assessment(s). Namely: by expanding the constraints analysis in the “Areas to be Protected and Developed Carefully Chapter Background Paper” to include the National Grid; and by amending Map 15 to differentiate the nationally significant National Grid transmission lines and substations from the electricity distribution network.

Thank you for the opportunity to provide comments at this time. Transpower is more than happy to answer any follow up questions that SmartGrowth may have on its submission, and to facilitate any meeting to address matters of detail. We also welcome the opportunity continue working with SmartGrowth on the Implementation Plan.

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Yours faithfully  
**TRANSPower NZ LTD**



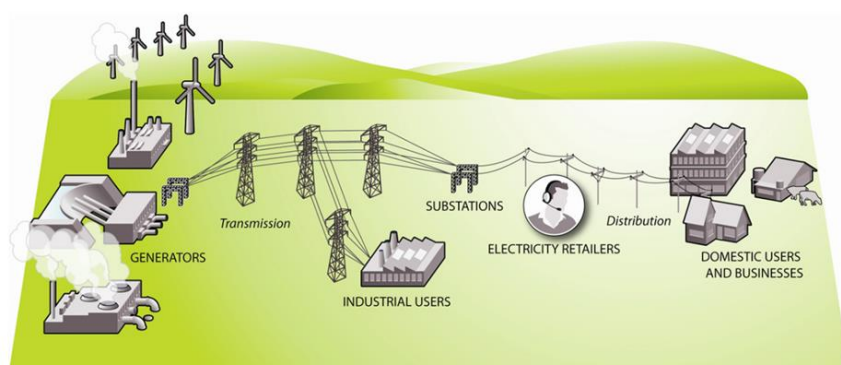
Rebecca Eng  
Technical Lead – Policy

## Appendix A: Supporting Information

### About Transpower

Transpower is the state-owned enterprise that plans, builds, maintains, owns and operates New Zealand's high voltage electricity transmission network, known as the National Grid. The National Grid connects power stations, owned by electricity generating companies, directly to major industrial users and distribution companies feeding electricity to the local networks that, in turn, distribute electricity to homes and businesses. The role of Transpower is illustrated in Figure 1 below.

Figure 1: Role of Transpower in New Zealand's Electricity Industry (Source: MBIE)



The National Grid stretches over the length and breadth of New Zealand from Kaikohe in the North Island to Tiwai Point in the South Island and comprises some 11,000 circuit kilometres of transmission lines and cables and more than 170 substations, supported by a telecommunications network of some 300 telecommunication sites that help link together the components that make up the National Grid.

Transpower's role and function is determined by the State-Owned Enterprises Act 1986, the company's Statement of Corporate Intent, and the regulatory framework within which it operates. Transpower does not generate electricity, nor does it have any retail functions. It is important to note that Transpower's role is distinct from electricity generation, distribution or retail. Transpower provides the required infrastructure to transport electricity from the point of generation to local lines distribution companies, which supply electricity to everyday users. These users may be a considerable distance from the point of generation.

Transpower's Statement of Corporate Intent for 1 July 2023, states that:

*"Transpower is central to the New Zealand electricity industry. We connect generators to distribution companies and large users over long distances, providing open access and helping to balance supply and demand. The nature and scope of the activities we undertake are:*

- *as grid owner, we own, build, maintain, replace, and enhance the physical infrastructure that connects those who generate and those who need electricity to live, work and play across the country; and*
- *as system operator, through a service provided under contract to the Electricity Authority under the Electricity Industry Participation Code, we operate the electricity market, managing supply and demand for electricity in real time to ensure that the power system remains stable and secure."*

In line with this role, Transpower needs to efficiently operate, maintain and develop the network to meet increasing demand and to ensure security of supply, thereby contributing to New Zealand's economic and social aspirations. It must be emphasised that the National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs.



As the economy electrifies in pursuit of the most cost efficient and renewable sources, the base case in Transpower's 'Whakamana I Te Mauri Hiko' predicts that electricity demand is likely to increase around 55% by 2050. 'Whakamana I Te Mauri Hiko' suggests that meeting this projected demand will require significant and frequent investment in New Zealand's electricity generation portfolio over the coming 30 years, including new sources of resilient and reliable grid connected renewable generation. In addition, new connections and capacity increases will be required across the transmission system to support demand growth driven by the electrification of transport and process heat. Simply put, New Zealand's electricity transmission system is the infrastructure on which New Zealand's zero-carbon future will be built. This work supports Transpower's view that there will be an enduring role for the National Grid in the future, and the need to build new National Grid lines and substations to connect new, renewable generation sources to the electricity network.

#### Statutory Framework

The National Policy Statement on Electricity Transmission 2008 (NPSET) was gazetted on 13 March 2008. The NPSET confirms the national significance of the National Grid and provides policy direction to ensure that decision makers under the RMA:

- recognise the benefits of the National Grid;
- manage the adverse effects on the environment of the National Grid;
- manage the adverse effects of third parties on the National Grid; and
- facilitate long term strategic planning for transmission assets.

The NPSET only applies to the National Grid, being the assets used or operated by Transpower, and not to electricity generation or distribution networks.

The NPSET sets a clear directive on how to provide for National Grid resources (including future activities) when drafting planning documents and therefore Councils have to work through how to make appropriate provision for the National Grid in their plans, in order to give effect to the NPSET.

The single Objective of the NPSET is:

"To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- managing the adverse environmental effects **of** the network; and
- managing the adverse effects **of other activities** on the network."

The NPSET's 14 policies provide for the recognition of the benefits of the National Grid, as well as the environmental effects of transmission and the management of adverse effects on the National Grid. The policies have to be applied by both Transpower and decision-makers under the RMA, as relevant. The development of the National Grid is explicitly recognised in the NPSET.

**National Grid Assets within the Western Bay of Plenty**Western Bay of Plenty District

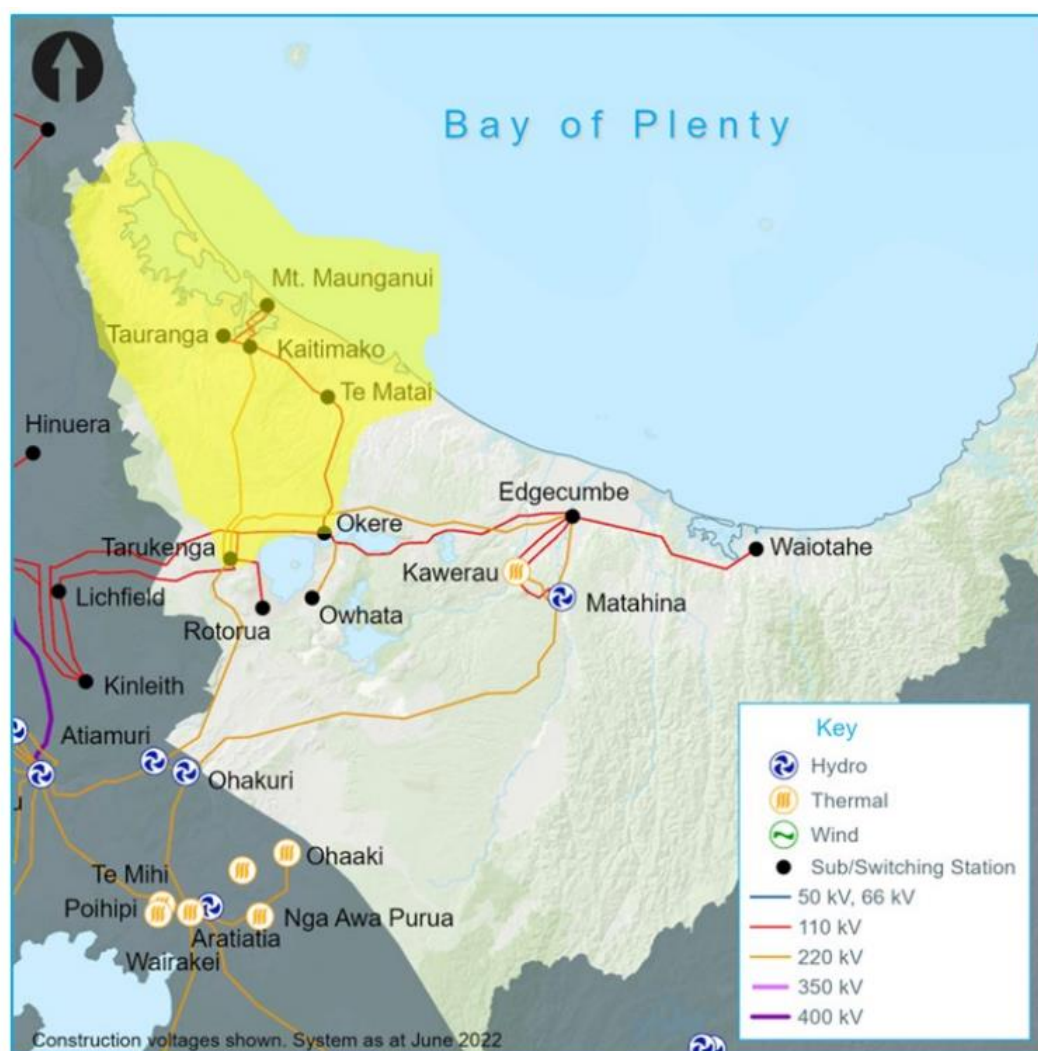
- Hairini – Tarukenga A 220kV transmission line (HAI-TRK-A) (traverses both jurisdictions)
- Hairini – Te Matai A 110kV transmission line (HAI-TMI-A) (traverses both jurisdictions)
- Okere – Te Matai A 110kV transmission line (OKE-TMI-A)
- Te Matai Substation

Tauranga City

- Hairini – Tauranga A 110kV transmission line (HAI-TRG-A)
- Hairini – Tarukenga A 220kV transmission line (HAI-TRK-A)
- Hairini – Te Matai A 110kV transmission line (HAI-TMI-A)
- Hairini – Mt Maunganui B 110kV transmission line (HAI-MTM-B)
- Hairini – Mt Maunganui A 110kV transmission line (HAI-MTM-A)
- HAI-MTM-B1 Cable Section 110kV line (HAI-MTM-B1-CBL)
- Kaitimako Substation
- Tauranga Substation
- Mt Maunganui Substation

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National Grid Assets in the Western Bay of Plenty (highlighted yellow)





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20 October 2023

SmartGrowth

Attention: Andrew Turner (Independent Chair)

Via Email: [administration@smartgrowthbop.org.nz](mailto:administration@smartgrowthbop.org.nz)

E te Rangatira, tena koe.

### **Submission on Draft SmartGrowth Strategy 2023-2073**

This submission on the Draft SmartGrowth Strategy 2023-2073 is made on behalf of Bluehaven Group as outlined herein and the submission form attached.

We support the fundamental intent of SmartGrowth Strategy 2023-2073 (**SmartGrowth**) which align closely with the long-term development aspirations for the planned Wairakei sub-regional centre (**The Sands**), the development of the surrounding Wairakei community, including development in Bell Road for industrial/employment land activities.

The submission seeks updates to more clearly define supporting commentary in SmartGrowth, so that there is consistency with Urban Form and Transport Initiative (**UFTI**) and recent planning directions from central government. The key issues raised are in relation to the Connected Centres Network and are summarised below.

### **Connected Centres Network**

1. The Sands is part of the Connected Centres Network approach in SmartGrowth and recognised as a “Subregional Centre” in the Tauranga City Plan and various other city and regional planning documents including:
  - a) Tauranga Urban Strategy Vision 2050.
  - b) Urban Form and Transport Initiative (UFTI) 2020.
  - c) SmartGrowth Future Development Strategy; and
  - d) Interim Joint Spatial Plan 2021.
2. The extensive planning of The Sands was to service not only the Wairakei and Te Tumu Urban Growth Areas but the SmartGrowth Eastern Corridor covering TCC and Western Bay of Plenty Council areas.

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Kaitiaki Property Services Limited - 1 Cessna Place, Mount Maunganui, Tauranga 3116

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3. A Comprehensive Development Consent (CDC) has been issued by TCC on 19 March 2020 and a subsequent Section 127 variation was issued on 6 July 2021.
4. In summary, The Sands is a sub-regional mixed-use development, having a consented commercial gross floor area of 232,050m<sup>2</sup> (including 386 units of visitor accommodation), and 1,287 residential units.

Table 1: The Sands CDC Areas

Area Type	Town Centre Area m <sup>2</sup>	MIBA Area m <sup>2</sup>	Total Areas
Retail			
General Retail/Cinema/Food and Beverage	62,670	4,550	67,220
Home Improvement and Showrooms		34,130	34,130
<b>Total Retail Areas</b>	<b>62,670</b>	<b>38,680</b>	<b>101,350</b>
Other Commercial Areas			
Commercial Offices	35,270	24,230	59,500
Government Services		9,700	9,700
Medical	15,000		15,000
Leisure	13,800		13,800
Civic	7,000		7,000
Hotels	25,700		25,700
<b>Total Commercial Areas</b>	<b>96,770</b>	<b>33,930</b>	<b>130,700</b>
<b>Total Areas</b>	<b>159,440</b>	<b>72,610</b>	<b>232,050</b>

5. Including proposed roading and infrastructure, the development covers over 30 hectares.
6. We are seeking recognition in the SmartGrowth Strategy of Wairakei – The Sands to be defined as a Metropolitan Centre under definitions in the National Planning Standards (NPS).
7. Wairakei – The Sands is the only Centre, currently listed on page 104 of the SmartGrowth Strategy as a Town Centre, that fully meets the definition and scale of a Metropolitan Centre, under the NPS.
 

*it is intended to be predominantly for a broad range of commercial, community, recreational, and residential activities” and is “focal point for sub-regional urban catchments.*
8. All major earthworks have been completed. Significant investment has been made in private and public infrastructure around and in The Sands, based on its recognition as a sub-regional centre.

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9. There has also been a continuation of extensive medium residential development that surrounds The Sands location, undertaken by Bluehaven and neighbouring developer Hawridge Development. This combined development activity is the most active residential development area in Tauranga, both in terms of actual new house delivery and related construction activity.
  10. The first stage of the commercial development of The Sands includes a New World supermarket and a second building (including a large 24-hour gym, a beauty spa and 5 food and beverage tenancies) is due to open in October 2024.
  11. It was recently announced that The Sands will also be home to a large Mitre 10 Mega store, and second store for Tauranga city. The Mitre 10 Mega and supporting tenancies are planned to open along with the PEI in 2026.
  12. In summary over 10% of the consented area will have been developed within the first 3 years of the SmartGrowth planning horizon of 2023-2073.
  13. The direction of RMA reform is towards a greater focus on spatial planning and long-term certainty on environmental outcomes which is important for SmartGrowth planning.
  14. It is understood that's Tauranga City Council is undertaking a review of its Commercial Centres Strategy in 2024. The classification of Wairakei – The Sands in SmartGrowth as per the NPS definitions is important to signal its importance in providing urban development and amenity for the sub-region and to deliver/support key Eastern Corridor outcomes listed on page 136 of SmartGrowth and other improvements in the region.
  15. SmartGrowth should signal the role of Wairakei – The Sands before the Tauranga City plan review of its connected centre network.
  16. We wish to be heard in the face to face, kanohi ki te kanohi programmed for 4 – 6 December 2023

Ngā mihi,

A handwritten signature in blue ink, appearing to read "Bryan Perring".

**Bryan Perring**  
Development Director  
Kaitiaki Property

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Kaitiaki Property Services Limited - 1 Cessna Place, Mount Maunganui, Tauranga 3116

sub 90

Submission Form

<b>Post:</b> <b>SmartGrowth Strategy 2023 - 2073 Administration</b>		<b>or Email:</b> <a href="mailto:administration@smartgrowthbop.org.nz">administration@smartgrowthbop.org.nz</a> <a href="mailto:haveyoursay@westernbay.govt.nz">haveyoursay@westernbay.govt.nz</a>
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**Submitter:** Kaitiaki Property on behalf of Bluehaven Investments Limited

This is a submission on the **SmartGrowth Strategy 2023 - 2073**

- 1 I could not gain an advantage in trade competition through this submission.
- 2 The details of my submission are in the attached table.
- 3 I wish to be heard in support of my submission.

20<sup>th</sup> October 2023

**Contact person:** Bryan Perring

**Telephone:** [REDACTED]

**Email:** [REDACTED]



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Address for Service of Submitter: 402 Maungatapu Road, Tauranga 3112

The specific provisions of the Draft SmartGrowth Strategy that my submission relates to are:

Reference	Support/Oppose/Update	Decision Sought	Reasons
Urban Form and Centres Page 102 Paragraph 4	Support in Part with updates as per the Decision Sought column.  Oppose in Part as per the strikeout deletions marked.	<p>Updates required to Paragraph 4 on page 102 are as edited below.</p> <p>The map also identifies the sub-region's main <u>connected</u> centres <del>in a hierarchy<sup>1</sup> of being the:</del></p> <ul style="list-style-type: none"> <li>City Centre (Tauranga CBD)</li> <li><u>Metropolitan Centre (Wairakei – The Sands)</u></li> <li>Town Centres (existing – town centres that are there now and proposed – new town centres that have been planned but development hasn't yet commenced)</li> <li>Potential Town Centres (locations that may turn into full town centres in the future).</li> </ul> <p>Town Centres are places that contain a range of commercial, community, recreational and residential activities that service the needs of the immediate and neighbouring suburbs <u>or sub-region for the Metropolitan Centre or larger Town Centres as per UFTI.</u></p> <p>Footnote</p> <p><sup>1</sup>The <u>connected</u> centres <del>hierarchy approach has can be been</del> developed to align with the <u>definitions outlined in the</u> National Planning Standards, November 2019 and the National Policy Statement on Urban Development 2020.</p>	<p>No centres hierarchy exists in Urban Form and Transport Initiative (<b>UFTI</b>) or in the National Planning Standards (<b>NPS</b>).</p> <p>The NPS requires classification of centres but does not prescribe any required hierarchy framework.</p> <p>SmartGrowth adopts a connected centres approach and wording should reflect this.</p>

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Reference	Support/Oppose/Update	Decision Sought	Reasons
Centres Strategy Page 104	Support in part  Update as per the Decision Sought column	Update the table to insert and classify centres as per the NPS definitions, including “Wairakei – The Sands” as a Metropolitan Centre as shown in the table below.	<p>Wairakei – The Sands is a sub-regional centre recognised in UFTI and is consented to provide the activities that meet the definition of a Metropolitan Centre as outlined in the NPS.</p> <p>The National Planning Standard’s definition of Metropolitan Zone (MCZ) notes “it is intended to be predominantly for a broad range of commercial, community, recreational, and residential activities” and is “focal point for sub-regional urban catchments.”</p>

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		Centre Type	Location	Description	
		<b>Regional and City Centre</b>	Tauranga Central Business District	Provides for a broad range of commercial, community, recreational and residential activities, intended to service the needs of the region.  Building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification.	<p>The Wairakei – The Sands Metropolitan Centre is the focal point for the Eastern Corridor as outlined on page 136 of SmartGrowth.</p> <p>The Sands will already have over 10% of the consented area developed within the first 3 years of the SmartGrowth planning horizon of 2023-2073.</p>
		<b>Metropolitan Centre</b>	Wairakei - The Sands	Provides for broad range of commercial, community, recreational and residential activities, intended to service the subregion.  Building heights and density are enabled to realise as much development capacity as possible within subregion catchment commensurate with the level of activities provided by the centre.	
		<b>Town Centres</b>	<ul style="list-style-type: none"> <li>• Waihi Beach</li> <li>• Katikati</li> <li>• Ōmokoroa</li> <li>• Bethlehem</li> <li>• Fraser Cove</li> <li>• Greerton</li> <li>• Cameron Road Centre</li> <li>• Tauranga Crossing</li> <li>• Mt Maunganui</li> <li>• Bayfair</li> <li>• Pāpāmoa</li> <li>• <del>Wairakei - The Sands</del></li> <li>• Te Puke</li> </ul>	<p>Town Centres provide for a range of commercial, community, recreational and residential activities, intended to service the needs of the immediate and neighbouring suburbs.</p> <p>Town Centres will provide building heights and densities of urban form density within a walkable catchment of commensurate with the level of commercial activity and community services.</p>	
		<b>Potential Town Centres</b>	Brookfield	These areas will become town centres over time.	

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		<p>Update “Centres Strategy” page 104 as marked up below.</p> <p>A key component of the connected centres approach will be establishing a commercial centres strategy throughout the sub-region to ensure that centres can thrive and meet the outcomes of UFTI in creating an integrated land use and transport network. In order to support the connected centres programme, <u>the City Centres</u>, <u>Metropolitan Centre</u> and Town Centres will be prioritised as people places, that strongly integrate with the public and active transport networks to ensure integrated outcomes can be achieved. This will need to include local employment and educational opportunities, access to green space and community facilities alongside housing so that communities can live, learn, work and play in their suburbs. This will require detailed planning for these centres over time to ensure on the ground implementation supports our sub-region’s high level strategic objectives.</p> <p>An indicative centres strategy has been established based on outcomes of the UFTI and to reflect the requirements of the National Planning Standards. At a strategic level, key centres include the Regional and City Centre, <u>Metropolitan Centre</u> and Town Centres. These may be subject to change following the outcomes of plan changes to the Tauranga City Plan and Western Bay of Plenty District Plan. Further work is also required in terms of developing a detailed sub-regional commercial centres strategy. This will form part of the Implementation Plan supporting this strategy.</p>	<p>Update required to include the Metropolitan Centre in wording.</p>
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Sustainable  
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## Initial Submission by Sustainable Bay of Plenty Trust on SmartGrowth Strategy 2023-53

### INTRODUCTION

This is an initial submission, pending further information from the SmartGrowth team in response to questions raised by ourselves and other ex-Forum members. At that point, we will put in a supplementary submission, supported by various other sub-regional organisations, including Bay Conservation Alliance, Te Puke EDG, NCW Tauranga, and others.

We will provide more detailed analysis in our supplementary submission.

### KEY ISSUES


We wish to begin our submission by explicitly stating that:

- this Draft Strategy is well written and contains some useful and important information
- the SmartGrowth team, supported by council staff, have done a good job on many aspects of this strategy - often on a very limited budget
- we understand the many years of prior work undertaken by council staff that has eventually culminated in this 10-year review of the Strategy

Our submission should be read in that context. This is not a badly written Strategy, nor a document that has certain flawed sections that just need correcting.

However, taken as a whole, this Draft Strategy is not currently an adequate or appropriate response to the needs of our sub-region. **The key point is that the proposed Strategy will not result in environmentally, socially and financially sustainable outcomes.**

The evidence is clear: the existence of SmartGrowth has coincided with a major worsening of environmental and social problems in Tauranga-Western BOP, along with worsening inequality



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and more severe economic problems than we've seen for nearly a century for some of our residents. **Putting it simply, growth has resulted in this being a worse place to live.**

There is data to back that up. Housing affordability is one such obvious issue, along with the highest rents in NZ, but there are many others. For many Tauranga residents, congestion is the biggest concern. For others, including many Tangata Whenua, it is the ongoing degradation of our waterways, the air pollution emitted from the Mount Industrial airshed, or the increasing amounts of CO2 being emitted from our sub-region. Still others talk about the ever-increasing deficit of affordable housing and the homelessness now seen in Tauranga.

We need to accept that, despite extensive efforts, SmartGrowth has not made this a better place to live. Likewise, this Draft Strategy will not solve the fundamental problems causing our region's problems.

That statement is not intended to criticise past SmartGrowth leadership, but to encourage our sub-region's current leaders to embrace reality and face up to the immensity of our challenge. This once-in-a-decade chance to re-position our response to growth should not be waved through.

Despite serious efforts, this Draft Strategy applies the same kind of thinking that got us into this mess. It is based on the same spatial plan and the same high carbon growth plan, with the same car-based transport system (follow the money to see the evidence of that).

Our Trust promoted this SmartGrowth Strategy consultation at a series of public meetings and, while certainly not suggesting those attending were a representative sample of the population, we yet again experienced the reaction we almost always get from local residents: they think growth has made things worse.

In particular, the broader feedback from local residents since our Trust came into existence in 2021 has been that we need to proactively try to slow down growth, rather than double down on the pro-growth narrative coming from some lobby groups with vested interests.

Yet, since 2021, the pro-growth narrative has only gained momentum and resulted in increased funding from TCC into "growth" infrastructure, which has resulted in an official City Council debt of three times what it was six years ago. Yet there has been no improvement in social and environmental indicators – and in fact, most indicators are far worse now.

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**Hence our primary feedback on this Strategy is that, because of its complexity and its many interrelated parts, we believe it is far more conducive to good policy-making to sit down with a broad range of 'stakeholders' to work through issues in an open and interactive way.**

We have found this submission process to be the most demanding of any council consultation yet. Writing a comprehensive submission requires a massive commitment of time to analyse the Draft Strategy and background documents - and should be better supported by SmartGrowth partners.

Our Trust made the decision to focus on engagement with local community groups and networks, rather than just spend our time reading all the background documents. We did that because the Independent Chair informed us that SmartGrowth did not get a large enough budget to do that engagement itself.

In retrospect, that was possibly the wrong decision. Most people did not end up sending in a submission. The feedback we received was that it was too complex and that the survey form was not at all helpful, as it didn't provide any prompts to help people shape their feedback.

We imagine this was known up front by councils, so it raises the question as to whether you really wanted to elicit a wide range of people's views? Surely your comms advisors told you that this consultation was not best practice?

Why couldn't TCC (and partners) spend as much as it has on promoting the Cameron Rd and Te Manawataki o Te Papa projects to support engagement on the single most important thing to ensure a sustainable sub-region: an overarching, evidence-based sub-regional strategy, based around a sustainable funding strategy and a sustainable low carbon plan for future development?

If that wasn't possible, the obvious thing to do when consulting on something this complex is to follow standard council practice:

- 1) Offer a guided written submission process (including multi-choice answers where appropriate) for people who want to share their views but don't have the knowledge of time or writing skills to type up responses for each section.
- 2) Still also offer the comment boxes you did, for people to add any extra wording they wish.

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- 3) Run a community engagement session in each part of the sub-region, to get wider feedback and support the needs of people who respond better through group sessions and/or oral language, including many Tangata Whenua, some other ethnic groups, some people with disabilities, and many others who respond better in groups settings where other people bring up ideas and stimulate innovative thinking and shared solutions.

Due to the lack of diverse and widespread feedback, we believe there is a real danger that you will end up approving something similar to this Draft Strategy, presumably with some changes made in response to public feedback, but not address some fundamental problems built into this growth strategy.

We understand the external time pressures. However, if the goal is to get the best outcomes for our region, it is critically important to get this once-in-a-decade strategy right.

That said, most of the people we spoke with suggested or supported these changes to the Strategy and related 'growth agenda':

- more focused moves to slow down growth, including changes to economic policy settings
- more community say on whether housing growth should proceed without suitable infrastructure
- less say from pro-growth lobbyists – often directly linked to vested interests
- more investment into local communities rather than urban sprawl
- more investment into public transport and fixing congestion
- less greenfield sprawl and more managed intensification
- more focus on medium-high density development along key public transport routes
- less emphasis on 4-8 story apartments, more on 2-3 story dwellings - especially on key PT routes
- more public housing, social housing and elder housing
- no more big debt increases (for TCC)
- less centralisation and more live-learn-play in local communities
  - e.g. sports hub/s and a transfer station in Tauranga West, rather than just centralisation in Tauranga East (Mount-Te Maunga)
- more low carbon solutions
- better environmental outcomes
- councils need to stop pretending we live-learn-work-play in our local communities

## SPECIFIC ISSUES

### The Overarching Goal of SmartGrowth

SmartGrowth should encourage sustainable economic and social continuity, as well as managing growth to ensure optimal social and environmental outcomes. It should not effectively be a growth plan to attract more and more people to our city and sub-region, in a way that negatively impacts people's lifestyles and wellbeing, and further depletes natural resources and damages the environment.

### Funding

The reality is that we have had much the same growth strategy for 20 years. Some things have been implanted, others haven't. It always comes back to funding.

Why does this Draft Strategy not contain a funding plan? It is only really a Strategy if it's a funded plan – otherwise it's just another document that will sit on a (virtual) shelf until it is funded.

More specifically on this issue, the Draft Strategy states (p 159):

Central Government has introduced tools to assist with the delivery and funding of urban development. This includes the Infrastructure Funding and Financing Act 2020, the Urban Development Act 2020, the Housing Acceleration Fund and the Māori Infrastructure Fund.

That wording is misleading. The Infrastructure Funding & Financing Act is a means of securing higher-cost **financing** for 'off-the-books' debt. It is still **funded by ratepayers**, who still have to repay the debt – paying higher interest charges than for Council loan-funded debt.

TCC itself stated:

"Council has looked to the Infrastructure Funding and Financing Act (IFF) to help with some of these balance sheet constraints but the cost of this also falls on the ratepayer. The impact of inflation and rising interest rates on the cost of living for our communities mean that there is limited room for rate rises or additional IFF levies (our ratepayers have constrained financial capacity, and many are already struggling with cost increases)."

That is the key point. **Financing debt is a minor problem. As TCC indicated, the key issue is funding of debt. The focus needs to be on who pays for growth.**

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The reality is that TCC residential ratepayers will next year be paying an average of roughly \$1000 rates just to finance the interest on the official Council debt. Let alone another chunk of money to start paying off the IFF Transport levy. Much of that debt relates to growth.

What's more, we read that Tauranga City ratepayers will have a debt of \$0.735 billion by 2045 just for growth in Papamoa East-Te Tumu unless we start repaying the debt next year. Growth has not and will not pay for growth unless we change the model!

IFF and PPPs are not the answer. We need to have a mature, comprehensive, informed conversation about this issue across all our communities. And we need to make a sustainable democratic decision about this important matter.

### **The Need for Up-Front Infrastructure to Support Intensification**

If high-density development is enabled, we have serious concerns about the lack of funding for infrastructure. This could severely compromise the quality of the outcomes of Plan Change 33. We think the SmartGrowth partners need to 'seize the day' and push back more strongly at central government for wanting existing residents to largely fund its growth agenda. Tauranga needs more funding now, especially for public housing and public transport.

We note that TCC's Plan Change 33 information showed its 25% and 50% intensification scenarios result in increased water infrastructure capital expenditure compared to the baseline of mostly new greenfield provision. That seems to go against the findings of other NZ cities (and international experience) that indicates higher-density intensification is cheaper overall.

This is a key issue. The overall long-term cost of intensification v greenfield developments needs to be fully understood by councils and by local communities, in order to make informed, sustainable decisions.

### **Strategic Demographic Issues**

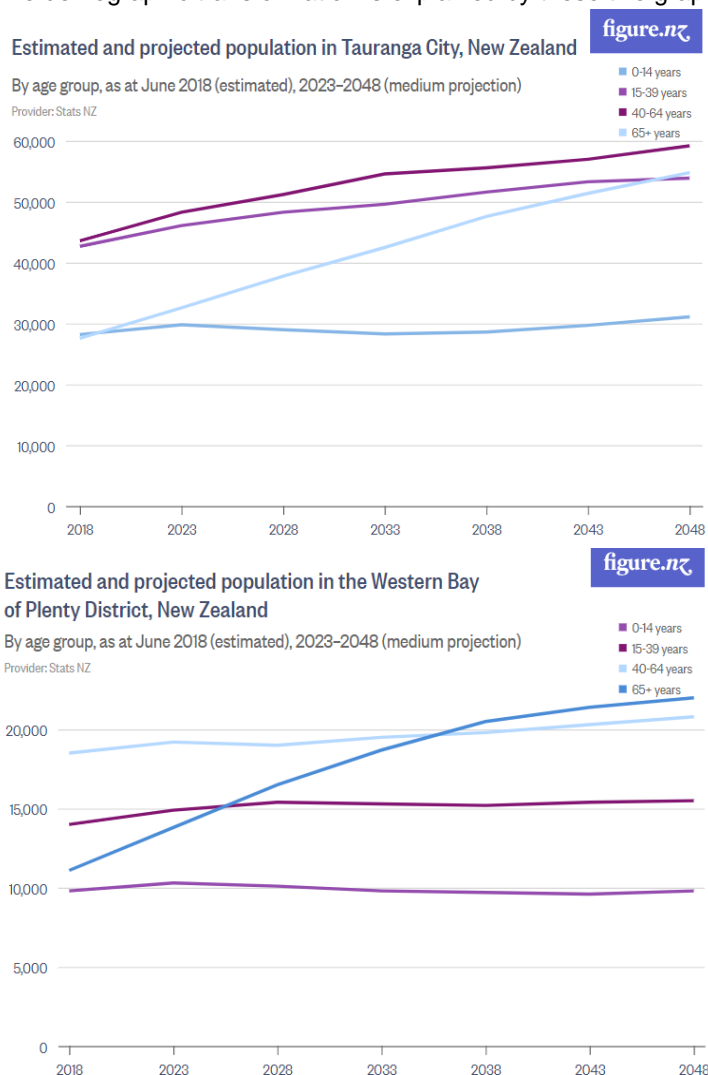
We are not convinced the Draft Strategy has fully and adequately considered three vitally important strategic issues:



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- High immigration growth – this has consistently been higher than forecast at a national level and that has been mirrored locally, resulting in under-provision of infrastructure
- Our ageing population – this does not seem to have been fully considered in regards to provision of health facilities, transport networks, and other social infrastructure
- Growing Māori youth population – we are not sure if this has been adequately provided for in regards to specific housing needs in relation to workplaces

The demographic transformation is explained by these two graphs, probably saving 1000 words:



The punchline is obvious: we need to design our city and sub-region to meet the needs of this rapidly aging population, including the large number of immigrants coming from outside the region.

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### Carbon Emissions

A major concern is the lack of robust analysis around carbon emissions. We have asked for carbon emissions analysis for the Draft Strategy, the Joint Spatial Plan, Te Papa Spatial Plan, Otumoetai Spatial Plan, Mount-Arataki Spatial Plan, UFTI, the TSP and other transport plans, the Tauriko Business Case, the Cameron Rd project, Maunganui Rd project, Civic Centre project, the Domain Stadium Business Case and several other large plans and projects.

We have seen hardly any detailed analysis, and what little we have seen is either insufficient to assess the best spatial planning and transport options, or points us in the direction that all the options being considered are high carbon. We understand that further modelling of transport emissions is still being undertaken, but the timing is unclear.

Embedded / embodied carbon emissions are also hugely significant in regards to transport infrastructure and other projects, such as the proposed Tauranga civic centre, and we are still not being told if those will be incorporated into any analysis and modelling.

We are particularly vexed by comments from the City Commissioners that Cameron Rd is their key “low carbon” project and that the proposed Tauriko Highway project will “fight climate change”. Both those statements are untrue. The Business Cases make it clear that both projects will increase emissions rather than cut emissions and BOP Regional Council, TCC and Waka Kotahi staff have all confirmed that.

We have seen no projects that show that carbon emissions will be reduced as a result of that project. It seems abundantly clear that **the proposed SmartGrowth Strategy is not a low carbon strategy**. That alone should require the current process to be halted, in order to change this Draft Strategy to a low carbon strategy.

It is 2023. The NZ government has signed up to cut carbon emissions in half by 2030. This SmartGrowth Strategy needs to reflect that reality and become a genuine low carbon strategy.

**How Realistic is the Spatial Plan?**

Is this proposed spatial plan allocating only 3000-4000 dwellings into Tauriko (along with 2000 in Keenan Rd) and just a 'strawman'? Will the combination of central government policy, limited funding, developer-led growth, and lack of priority for sustainability and low carbon outcomes result in more and more greenfield sprawl? (i.e. the status quo)

Is the most likely outcome that high density intensification won't actually proceed because of a combination of factors (land values, building costs, citywide development contribution charges, lack of rapid transit, lack of other community infrastructure, etc.), but particularly because the opening up of greenfield areas will always be a 'pressure releasing valve' that prevents more intensification. In other words, most developers will just wait for the next greenfield area, rather than change their model to develop higher density intensification.

We don't know the answer to those questions, but we suspect that land bankers around the edges of the city will continue to want to reap the rewards from urban sprawl, and developers will prefer not to invest large amounts into untested high-density intensification.

Our concern is that this Draft Strategy could allow councils to claim they are following and implementing government policies, implying there will be high density living in central locations, reduced carbon emissions, and improved housing affordability, when the most likely outcome may well be mostly further greenfield sprawl, higher carbon emissions, and continuing housing unaffordability. After all, most low-income households can't afford either the houses or the high level of rates that will be required to service all the greenfield growth infrastructure.

Our concern is highlighted by the lack of consistency between the narratives coming from SmartGrowth and the narratives from some at TCC.

In particular, the conflict between the Draft Strategy's stated provision for 3-4000 dwellings in Tauriko by 2054, contrasted with TCC Commissioners' statements (and slides) that the Tauriko bypass is needed before the 2040s to allow "25,000 dwellings" to be built in the Western Corridor. Which is true? Only 10% of all growth through to 2054 in Tauriko? Or more than half of all growth?

And is the "reasonably expected to be realised" number of dwellings in Tauranga City by 2054 really 19,000 (per TCC) or only 11-15,000 (as per this Draft Strategy)?

**Eastern v Western v Northern Corridors**

Ongoing growth in all three 'greenfield growth' corridors are highly problematic. Some general comments on these three growth corridors:

- The Northern Corridor is a problem because:
  - Omokoroa has no large employers or business areas, so many people need to travel outside the suburb on a daily basis.
  - There is no cost-effective plan for enhanced public transport on that corridor.
  - Future development of Te Puna is a touchy topic and our Trust is concerned:
    - (a) about preserving Te Puna's natural environment and heritage
    - (b) that Omokoroa development only made sense if Te Puna is also developed.
- The Western Corridor was always described by councils, NZTA and government ministers as a poor, high carbon option for placemaking and active and public transport. The fact that TCC now says it will be a good, low carbon development in that regards does not make it so! It will result in over 100,000 extra daily vehicle trips and lots more carbon emissions. Equally importantly, it is not an attractive place for people to live, especially those in the 65+ age group (it's colder up in those foothills and not part of Tauranga's renowned beach lifestyle).
- The Eastern Corridor has long been the natural growth corridor and it is attractive to those wanting a beachside lifestyle. It contains Tauranga's largest suburban area (Papamoa), it has the TEL and railway line, it also includes an old town (Te Puke) and villages / rural centres (Paengaroa, Pongakawa, Maketu, Pukehina), and it will soon contain a well-located industrial hub (Rangiuru). Most importantly, those locations already contain much-needed community infrastructure, whereas greenfields do not. What's more, rural workers will be needed in this corridor (growth of kiwifruit sector, etc.), so nearby housing provides for a known need.
- The Eastern Town Centre may be a good idea (we don't know – we've seen no concrete plan). We support 'natural' growth in the 'villages' in this corridor, to service the export-led growth that is naturally happening out east. This is preferable to the 'induced' growth created by flattening hillsides in Tauriko and elsewhere e.g. shopping centre and industrial area built from scratch.
- Climate change scenarios are obviously an important consideration. However, smart planning and medium-density development of more resilient locations in the Eastern Corridor make that a viable option, noting that geological plate movements are favourable along that coastline.
- We also note that the water resource investigations do not provide confidence for large-scale long-term urban development anywhere in the sub-region!



**Concerns About the Implementation of NPS-UD and PC33**

While we support the goal of channelling more growth into higher density neighbourhoods within the existing city footprint, we are concerned at the lack of robust discussion about the specific plans and the pros and cons of such an approach.

We are also concerned about the practical application of the Strategy. Plan Change 33 could result in badly designed, poor quality, apartments and townhouses that fail to adequately address housing affordability and sustainability, in neighbourhoods that do not have adequate provision of sustainable transport options or community facilities, resulting in congested street parking due to lack of on-site parking spaces.

The sequencing is vitally important and we strongly support provision of better public transport, safe cycleways and active transport accessibility, EV charging facilities, and car-sharing options BEFORE allowing high density developments without adequate provision of public transport or off-street parking.

We think SmartGrowth should collectively:

- reject central government's blanket medium density (3 x 3 story) across Tauranga, including new growth areas
- limit high density zones (6-8 story) to smaller areas with good public transport
- focus on intensification in specific key areas of the existing city
- only enable greenfield growth areas with good potential for high density, low carbon, transit-based development
- prioritise a connected rapid transit-style public transport network to 'connect the centres'
- fast-track better public transport to all infill / 'brownfield' and greenfield growth areas
- develop a viable parking strategy that encourages public and active transport but also allows households to store one vehicle per household

develop clearer requirements for sustainable housing and urban design outcomes, including water storage and greywater requirements, solar hot water, requirement for greater area of permeable surfaces, limiting use of insinkers, and so forth.

### A Flawed Growth Model

We have reached the following interim conclusions:

- 1) This is all being driven by an unsustainable growth agenda at central and local levels.
- 2) SmartGrowth promised live-learn-work-play in local communities, but the opposite happened. Since SmartGrowth began, Tauranga has moved to a more centralised community infrastructure model for recreational and sporting activities (think Blake Park) and a dispersed model for educational facilities (e.g. PTEs), while consenting ongoing development of ribbon shopping strips and malls (e.g. The Crossing). Precisely the opposite was needed.
- 3) UFTI is severely flawed.
- 4) The SmartGrowth councils treat [UFTI](#) as an 'Old Testament' type of document that cannot be changed, resulting in some council staff explaining away environmental damage and substandard planning by literally saying "we've been told we have to implement UFTI".
- 5) Councils need to revise UFTI to an updated ('New Testament') sustainability plan.
- 6) UFTI initially stated that two rail-based urban development options scored highest in its objective analysis, saying a public transport based development model was the best option - better than a compact city with citywide intensification.
- 7) What's more, UFTI clearly stated that a "Compact and connected city" was not an optimal model for Tauranga – it scored lower than all the other options except for "Dispersed growth" ("low density growth" with "a lot of unfocused cross movements to connect people between where they live, learn, work, and play") – clearly not a good option.
- 8) Councils never explained why those rail options were downgraded in favour of a severely compromised "Connected Centres" option without rapid transit. The result is that UFTI is basically promoting sprawling, low-medium density development without any specific plan for rapid public transport connectivity. At a stretch, you could say it's transit based development without the transit = slightly-higher-density sprawl + high carbon transport.
- 9) This Draft Strategy and Plan Change 33 could result in the worst of all worlds: lots more sprawl, high housing costs, high carbon emissions, worse congestion, higher energy consumption (blocked sunlight), lack of amenity, and poor quality of life (homelessness, social isolation, etc).
- 10) This Strategy and Plan Change 33 need to reject the government's blanket medium density sprawl across both the existing city and new greenfields, by using the "enormous discretions" (MP Bishop) contained in the legislation, and only allow high density zones to be developed in defined areas where there is provision of connected rapid public transport.

### The Need for Local Community Voices

All Tauranga and Western BOP communities should have a voice in how we plan for future growth. There is an immense amount of local knowledge and it needs to be listened to by decision-makers. Instead of scrapping the SmartGrowth Forums, the Strategic Partners' Forum should have had an increased role at this crucial time and there should have been investment into community engagement to gather people's aspirations, criticisms, and recommendations for our sub-region.

The explanation that the Forums were ended because "we are in an implementation phase" was misleading. We are always in an implementation phase. Now, more than ever, we are also in a planning phase and we needed those voices in 2022 and 2023 to ensure a robust, evidence-based Strategy. Yet that was precisely when SmartGrowth terminated the Forums!

We have nationally recognised sustainability experts who live and/or work in Tauranga-WBOP and who are willing to invest time into supporting a more sustainable region. Yet these people are largely ignored.

We strongly urge you to re-establish the Strategic Partners' Forum ASAP and to tap into the immense local knowledge that can help to guide you towards a genuinely sustainable Strategy – one that is more financially, economically, socially and environmentally sustainable.

Equally importantly, we urge you to add representation from Social wellbeing and Environmental wellbeing onto the SmartGrowth Leadership Growth and Senior Management Group, to balance and complement the Economic representation on those groups. We also note that this representation needs to be representative of the broader community views, and not representing the views of any one organisation.

Along those lines, we also note that the recent appointment of Priority One does not fit that mandate, as we do not believe that organisations that primarily service their membership should be representatives on public planning bodies. We note Te Puke EDG is also an important economic body in the sub-region. More importantly, the representatives should represent the views of the wider community.

Those comments in are no way intended to convey any criticism about any organisation/s themselves, but to critique the rationale for selecting representatives onto the SLG and SMG.

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**Please Slow Down!**

Rapid growth is well known to cause a myriad of socio-economic problems, including congestion, unaffordable housing, high carbon emissions, intergenerational poverty, and so forth. We need to slow down and manage growth properly, with a truly sustainable plan.

While this Draft Strategy is admirable in its intentions and the vast amount of work that has gone into it, it will not resolve our key challenges.

The missing piece is your communities. You've heard us say it before, but it bears repeating:

- There was no consultation on UFTI
- Tauranga is the only metro city to have not explicitly consulted on its (overall) transport plan
- The Spatial Plan was developed without any public input or even stakeholder input (other than tangata whenua)

This Strategy has been created without direct input from your local communities. It is a bureaucratic document that probably meets most legislative requirements (although we question whether it meets new carbon emissions requirements), but it does not meet the needs of your local communities.

Please stop kowtowing to central government and property developers. Instead, support and advocate strongly for your local residents. If in doubt, go and meet with the various residents' groups and community groups (as we have done) – there seem to be some common threads.

**Common Feedback:**

- Slow down, “stop growth for growth’s sake” (noting the current goal is “**to grow** a sustainable economy that improves productivity and delivers prosperity to local people and communities”).
- Instead, try to limit growth - and take time to talk with your communities about this issue.
- Pause the greenfield sprawl, pivoting to focus on enabling high-quality, sustainable, low-carbon, medium-density development in existing parts of the city.
- And for goodness sake, urgently address congestion.
- You need to build lots of park & ride facilities – and address congestion by developing the long-promised rapid transit public transport plan, to connect UFTI's ‘connected centres’.

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**Specific Questions from the 'Forums' Collective that we posed to SmartGrowth Staff:**

1. Why isn't TCC's RER number (19,000 dwellings) being used for the SG Strategy infill / intensification number (that'd result in 50% infill / intensification)?
2. Will intensification mostly be 2-3 story townhouses, or 4-6-8 story apartments? The dots on the map seem to indicate 4-8 stories, but is that realistic?
3. Why are there contradictions between the SG Strategy and TCC documents, in regards to numbers and timeframes for new dwellings in Western Corridor?
4. How does final shape of PC33 (and new government) influence this Strategy?
5. Does the strategy adequately take into account new technology and AI?
6. Why is there no solid carbon emissions analysis?
7. Is there any evidence at all that implementing the Strategy will result in the required big reductions in carbon emissions?
8. If not, why is that acceptable?
9. Why is the polluted air shed at the Mount not addressed? Isn't the Strategy the place to look at options to move the polluting industry away from schools and houses?
10. Why is the adequacy or otherwise of potential future water supply not addressed in this Strategy, before committing to decades of further high population growth?
11. Why is there nothing in this Strategy to show what the TSP Public Transport Plan looks like at a practical level and how it will be implemented?
12. Why are park 'n rides still a side issue? (i.e. not enough of them planned)
13. Can we afford to invest in low carbon infrastructure e.g. a rapid transit network, likely to be the best way to cut transport emissions? (the carrot to go with the road pricing stick)
14. Does the Strategy fully account for the projected large increases in 65+ age group?
15. Will it meet the needs of that fastest growing age group and the different needs of 65-74, 75-84, and 85+ year olds?
16. Does the Strategy account for and meet the needs of the large and
17. increasing numbers of people with disabilities and mobility issues?
18. Will it provide sufficient appropriate housing for our elderly and disabled residents?
19. If not, why not? (This seems one area with strong societal consensus: taking care of our elders and our most vulnerable.)
20. How will this Strategy realistically result in affordable housing?
21. How much affordable housing is anticipated and how is "affordable" defined?
22. Why isn't inclusionary zoning a key part of the Strategy?
23. Will growth ever pay for growth? e.g. Are higher DCs or IFF used for new greenfields?
24. If not, how will we afford the infrastructure to cater for all this extra growth? (We already have the highest rates of any NZ city and increasing elder poverty.)
25. In other words, is this a sustainable strategy?
26. If the answer is no, then why move forward with this Strategy? Why not change it?

**sub 91**

Finally, Sustainable Bay of Plenty Charitable Trust wishes to also support the following submissions and these and others will support our Supplementary Submission in November:

- Te Puke EDG
- Carole Gordon
- Paul Hickson
- Julian Fitter
- Beth Bowden
- Julie Andrews

## About Sustainable Bay of Plenty Charitable Trust

### Our Vision

To be great ancestors.

### Our Mission

Shaping sustainable outcomes through awareness, accountability and action.

### Our Purpose

To make environmental, social and economic sustainability a key lens through which organisations frame and evaluate their strategic and operational decision-making.

We do this by:

- Raising awareness of sustainability issues
- Connecting sustainability stakeholders, including businesses, councils and communities
- Disseminating evidence-based analysis relating to sustainability issues
- Promoting and delivering sustainability education, discussions and events
- Supporting the development of a low carbon circular economy
- Promoting sustainable urban development and transport systems

We provide evidence, tools and support to encourage, enable and evaluate sustainable decision-making by community groups, businesses, iwi and hapu, local government and central government.

### Our People

Glen Crowther is our Executive Director and together with an active and engaged group of trustees, each person contributes their unique experience and expertise. We have come together because we face an unsustainable and inequitable future.

The need for a strong sustainability organisation in Tauranga and the wider Bay of Plenty is clear. We have a housing crisis, our CO2 emissions have increased more than most other NZ regions, there is increasing social deprivation, we have water shortages, many of our region's waterways are polluted, Tauranga has the lowest mode share for public and active transport of any NZ metro, our urban planning has failed to meet the needs of our growing and aging communities, and engagement between Council and local communities is at an all-time low here in Tauranga.

We welcome partnership and collaboration with any other organisations or groups who share our kaupapa. Together with our supporters, we aim to create a more prosperous and sustainable future for Toi Moana | Bay of Plenty.

***We are independent, non-partisan, and evidence-based. We advocate for a systemic approach based on the principles of equity and strong sustainability / Te Ao Maori.***





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**From:** Vincent [REDACTED]  
**Sent:** Thursday, 26 October 2023 10:01 am  
**To:** administration@smartgrowthbop.org.nz; Have Your Say  
**Cc:** Craig Batchelar  
**Subject:** SmartGrowth Strategy 2023-2073

Good morning,

For a number of reasons I didn't manage a submission prior to 20<sup>th</sup> October. I am hoping this could be accepted as a late submission. In summary:

- Overall, generally support the direction and robust work going in to the FDS.
- Would seek some clarity of direction on the FDS dealing with 'unanticipated' or 'out of sequence' development.
  - Could the key principles of the 'Connected Centres', along with other factors such as size, accessibility to transport networks, types of development to be enabled etc, be used in assessing the merits of future 'unanticipated' development that does not fit neatly with areas indicated as being planned or potential growth areas?
- Would seek some clarity on the geographic extent to which the FDS applies. There are several diagrams in the draft consultation package that could be use to argue different precise locations. The strategic corridors are not reflected on staging of business and housing land, for example, yet many facts and issues are corridor-based.
- For example, I am aware of distinct housing pressure in the Pongakawa area, immediately east of Paengaroa, owing to mass (thousands of hectares) recent conversions from dry/dairy farming to more employee-intensive horticultural orchards. This occurring in tandem with TEL and Rangiuru Business Park coming online. The need for further development in/around Pongakawa is touched on in places, but is silent on certain diagrams. I am keen to know how the FDS intends to deal with this and other unanticipated development opportunities that may arise across the life of the FDS.
- Seek further consolidation of Tauranga City as a whole by way of broadly identifying the potential to wrap around Welcome Bay/Kairua to connect to Papamoa. I am aware developers have purchased tracts of land on the southern side of TEL (between TEL and Bell Road, Papamoa East), and this could be the catalyst for consolidating further the urban extent of Tauranga back towards the rest of Tauranga, pivoting away from sprawling further along the coast than what is already planned/allowed for. Appreciate this is heavily constrained as land of importance to tangata whenua, as well as varying hazard constraints, however the potential for exploring and realising development in places in this area should be broadly provided for, in my opinion.
- Can the transport and utility infrastructure broad development requirements in each corridor, be reflected on a master staging plan? Would seek to see clear commitment to roading, public transport including rail projects across the life of the plan, up-front to then inform implementation plans. Tauranga is well serviced with railway infrastructure, and it appears the city is ripe for coordinated bus (commencing – Cameron Road), and rail investment to improve accessibility around the city, enhance vibrancy of local centres/CBD. Some further scoping/commitments around transport projects as integrated with planned development is requested in the strategy.

If you can please let me know if this can be accepted as a late submission, and add me to communications regarding hearings etc, that would be much appreciated.

Kind regards

Vincent Murphy  
Senior Planner MNZPI, MRMLA  
[REDACTED]

## SmartGrowth Strategy 2023-2073

Submission by Christine Ralph

This submission is about the **Housing Strategy in Part 3 Chapter 7 and more particularly Part 5, the Implementation Strategy**

The submission seeks greater detail in the implementation section about Housing actions.

A strong Strategy is one that clearly describes the Objectives and how they are to be achieved through policies or in this case Directives. If the Strategy is not clear and decisive then all Plans and Policies that flow from it will also be weak.

My concern is that whilst we have in this Strategy, a much-improved description of our housing issues and challenges, the Strategy does not define clearly enough in the Directives how this challenge is to be met. This lack of clarity will not assist the future Council staff and politicians in generating the paradigm shift that is expected by the writers of the document and the community.

To set the context of the submission, I quote from various parts of the Strategy as follows.

The Strategy in Part 1 on page 16 states a social **Objective** :

***“Enable and support sufficient housing supply in existing and new urban areas to meet current and future needs, this includes a range of housing types, tenures and price points.”***

Page 18 further defines this with the following **Directives**:

***“Growth Directives:***

- ***A range of housing types, tenures and price points is provided within all growth areas and Māori land.***
- ***Public housing supply is increased and aligns the typologies of new and existing housing stock to match the needs of the community.***
- ***Proactively support the delivery of social and affordable housing in existing urban areas and growth areas.***
- ***Provide land and infrastructure sufficient to address identified short-, medium- and long-term shortfalls in housing and business development capacity”***

Under the Marae development Directives there is also the following:

***“Support and realise tāngata whenua aspirations for Māori land and papakāinga development in urban areas and in the rural environment.”***

I agree with part of the following statement from page 111

***“A paradigm shift is required to ensure future development provides the range of housing options the community needs, from social and affordable rentals to alternative tenures and private ownership housing. A concerted and coordinated effort across the SmartGrowth partnership will be required to deliver on this. This includes local and central government, and tāngata whenua, working alongside key stakeholders. It will rely on using the tools available to all partners.***

***The SmartGrowth Partners have developed a Sub-Regional Housing Systems Plan which brings together the key housing information for the western Bay of Plenty sub-region, identifies gaps, and lays out a clear Action Plan to improve the housing system in the sub-region, now and into the future. This section draws on the***

*Sub-Regional Housing Systems Plan, setting out the housing challenge and actions needed across the SmartGrowth Partnership to address this."*

I spent a week seeking a copy of the Housing Systems Plan to learn of the detailed actions to achieve the Objective and discovered that it is not finalised yet and therefore it may not have informed the Strategy. The explanation that I received from staff was:

*The Housing Systems Plan is being informed by the SmartGrowth Strategy 2023 policy settings so it's really helpful for people interested in housing outcomes to give feedback on the Strategy 2023.*

So, the Strategy is being informed by the Systems Plan yet the Systems Plan is being informed by the Strategy. Clearly the wording in the documents has to be aligned.

Looking at the **Housing Directives** that have been stated in the Strategy Part 3, on Page 114 they are :

*"1. Support and realise tāngata whenua aspirations for Māori land and papakāinga development in urban areas and in the rural environment.*

*2. Deliver the place-based housing plan through collaboration and leadership.*

*3. A range of housing types, tenures and price points is provided within all growth areas and Māori land.*

*4. Affordable housing supply is increased and targeted to stressed households (renters – submarket and market; alternative tenures; progressive ownership; iwi).*

*5. Urgently reduce households being housed in unsatisfactory emergency accommodation.*

*6. Public housing supply is increased and aligns the typologies of new and existing housing stock to match the needs of the community.*

*7. Demonstrate mixed tenures and housing typologies through intensification projects.*

*8. Proactively support the delivery of social and affordable housing in existing urban areas and growth areas"*

As a broad generalisation, Directives 1,5,6, and 8 ,printed in black ,are the domain of social/public /Māori Trust agencies such as Kainga Ora and the Marae and Community Housing Groups. I'm advised by experts in that field that social housing traditionally accounts for 7-8% of the housing market. Directive 2 is an action for the local authorities.

Directives 3-4 and 7 , shown in red ,are generally traditionally developed by the private sector which has struggled to provide a range in tenures ,types and price points at the lower end of the price continuum. The exception to this is the Māori housing referred to in Directive 3 .The word "demonstrate" in Directive 7 implies some form of Council involvement in demonstration projects.

Directives 3 and 4 are the key to making a tangible difference to the supply of housing in our region. The vast majority of housing supply is delivered by the private market and they need support in providing for the lower cost housing sector. Developing at the lower end of the housing market is not as profitable and it is challenging technically to meet all Plan and Code requirements and provide a sustainable ,liveable environment at a lower cost price point.

When one reads the **Implementation Section** in Part 4, the strategy is inadequate. Part 4 contains household targets by growth corridors but not the breakdown of tenure, typology and price points as Directive 3 anticipates.

**Part 5** that defines the Funding and Implementation Plan ,states that the Housing Directives will be met by the ***“Housing System Plan plus actions arising Priority Development Areas”***. As I have discovered the Housing System Plan is being informed by this Strategy. The Strategy cannot remain with no clear action requirements on how the ***“range of housing types, tenures and price points is provided”***

The housing crisis in this region requires the local authorities to do more than provide land, infrastructure and Plan rules that provide the opportunity for a range of housing typologies in the growth areas .

To achieve the paradigm shift the local authorities must be more proactive in a range of ways to gain better housing outcomes. The housing sector is a complex web of interacting elements many of which need to be refined to facilitate more, better quality housing for a range of tenures and lower price points.

Politicians cannot sit on their hands and do nothing but rely on central government to solve the challenges. I know politicians are reluctant to advocate for change in various forums .That inertia has been the approach for decades and the housing problems in this sub region have become significantly worse despite being warned relentlessly by groups at the coal face of housing provision that the crisis was deepening. In 2020 Tauranga was ranked the fifth least affordable city for housing affordability in the world. That is an indictment of our housing, economic and political sectors at both the local and central government levels.

Facilitation and collaboration with housing developers , suppliers, financiers and bankers , advocacy to central government and the housing industry and in-house skilled staff to facilitate the approval of housing projects and deliver advocacy to government/other agencies are just some of the measures that could be undertaken.

In addition ,each Council needs staff skilled in housing development to undertake the facilitation and advocacy roles as defined. The Housing Action Plan Working Group or equivalent group ,must continue in their advisory /facilitation capacity provided that that group contains at least 50 % membership of people who actually are working in the housing development sector and can facilitate collaboration and advocacy for housing projects. The joint forums presentation in April 2021 sought this amongst other things and I understand the SmartGrowth Committee accepted and adopted our five recommendations. I don't believe these actions have been undertaken .

The community needs greater action by the politicians on housing supply. Ineffective political stewardship needs to stop.

#### **This Submission seeks:**

1. Within the Housing Directives Part 3 and Implementation Part 4 action statements including the following ( or similar):

#### **Social/ Community Housing**

- I. **Support and collaborate** with central government through project grant schemes , state housing provision ,fiscal support for Community Housing projects, partnering in exemplar affordable housing projects.
- II. **Continue to support** the homeless sector initiatives .
- III. **Continued subsidisation** of development/financial contributions.

## Private Sector Housing

- I. **Provide fiscal support** through shared equity schemes and joint venture affordable housing developments and /or exemplar projects.
  - II. **Facilitate** home ownership deposit schemes provided by the housing market, trusts or other mechanisms that provide for the in-perpetuity retention of rental and ownership homes in an affordable housing pool.
  - III. **Provide regulatory support** through RMA Plans for development incentives for permanent affordable housing throughout the community.
  - IV. **Facilitation with MHUD** on financial schemes ( such as the Land for Housing Program, Progressive Home Ownership Fund through an approved provider, First Home Starter grants and reduced deposits).
  - V. **Co-ordinated advocacy** with other local authorities to central government on legal mechanisms for inclusionary zoning and betterment taxation for affordable housing and other legal initiatives.
  - VI. **Co-ordinated advocacy** with other local authorities to the banking industry for less constrained lending for housing developments ( e.g. profit rate requirements ) and more acceptance of housing equity schemes and rent to buy schemes and other such solutions that will come over time.
  - VII. **Co-ordinated advocacy** with other local authorities to central government on the cost and supply streams for building products and a skilled construction workforce.
  - VIII. **Ensure** that each Council has staff skilled in housing development to undertake the facilitation and advocacy roles as defined. This must include continuing with the Housing Action Plan Working Group or equivalent name , provided that it contains at least 50 % membership of people who actually are working in the housing development sector and can facilitate collaboration and advocacy for housing projects.
2. In the Part 4 ,to provide a breakdown of the target housing supply by location that has to be met for rental and ownership by household size ( traditionally the number of bedrooms ) and price point. I attach for your information a copy of housing assessment criteria that HAF provided to UFTI in February 2020 which gives you some idea of the breakdown required and anticipated.
  3. To make it clear in the Strategy document that the adopted Housing Action Plan actions have been absorbed into the Housing Systems Plan.
  4. Create a forum for monitoring the Housing Systems Plan similar to the Transport Systems Plan Partner Management Group and an associated Governance Group. There must be regular monitoring and accountability of the Council's actions in facilitating a range of housing types, tenures and price points within all growth areas and Māori land. Housing is as crucial as transportation to the sustainable development of our region so treat it with the same vigour.

Christine Ralph

18<sup>th</sup> October 2023

## Attachment One

### For Discussion with UFTI \_Housing Criteria for MCA of Options

#### HAF December 2019 tabled 10/2/2020

1. The Option provides the **total number of dwellings** required in 5 years, 15 years, 25 years and 50 years as defined in the Boffa Report 2019, and
2. The Option provides for at least x...% of **total dwellings as medium density housing** (the quantum being as defined in the Boffas Report or Housing We Need Report and the definition being perhaps 150- 200M2 per household CHECK for the 1-2 person households regardless of income) *in the 5 years ,15 years 25 years and 50 years* ,AND this is evenly spread in the northern , eastern, southern and western corridors of the region ,
3. The Option provides for the **required proportion of affordable dwellings** ( as stated in the Boffas Report being defined as less than 30% of household income spent in rent/mortgage in reports ) dwellings in 5 years, 15 years , 25 years and 50 years AND this is evenly spread in the northern ,eastern, southern and western corridors of the region ,and
4. The Option provides for 50% of dwellings for rental by 2040 ( CHECK date ),and
5. The Option provides for the required **total number of 1&2 person households as the total number of 1&2 bedroomed dwellings** required in the 5/15/25/50-year intervals .and .
6. The Option provides for the required defined proportion of **affordable dwellings** (defined as less than 30% of household income spent on rent/mortgage in reports ) in 5 years, 15 years , 25 years and 50 years *as in criteria 3 above* AND of which **66% are within 500m of PT services**
7. The defined and agreed ratio ( m2 per person )of **accessible public reserves** excluding active sub -regional parks ( Baypark ,Blake Park,) and beaches ,**within 10 minutes or less walking distance of medium density housing areas and affordable housing areas** ( *criteria 2 and 3 above* )in the northern ,eastern, southern and western corridors of the region .

Smartgrowth Strategy 2023 - Summary of Submissions

Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-01: Areas to be protected and developed carefully	1: Areas to be protected and developed carefully	17	5	Pirere, Tania	The whole takiwha of maketu. Maketu is the one of the very few little towns when you drive there especially for the time is like back in the 70s and 80s the whole ahautangata being back of the days of our nannys and koros
		27	5	N/A, Richard	Room for wetlands and water. Auckland made all the mistakes we need to learn from. Make tauranga a sponge city with room for rivers and wetlands to take sediment. Houses should be built with a view to 100 years, not the next cyclone. Corridors of vegetation linked together can provide a lager area for native animals.
		59	4	Ministry Of Education	5.1 Chapter 1 Areas to be protected and developed carefully The Ministry supports the approach of ensuring that development is directed away from areas where there are critical constraints to development or intrinsic environmental and cultural attributes that must be protected from future land development. The precautionary approach to growth in areas with natural hazard susceptibility and other land constraints is also supported.
		72	7	Nga Potiki a Tamapahore Trust	NPaTT support the land not being identified as a "no go area" on Map 1. Adopt Map 1 as notified in relation to land located to the south of Tara Road, Papamoa legally described as Section 19 SO 489379, Sections 25, 26 and 27 SO 457368.
		72	8	Nga Potiki a Tamapahore Trust	NPaTT acknowledge that there are some constraints on the subject site and acknowledge its inclusion as a "go carefully" and flood identification layers with respect to natural hazards. Adopt Map 2 & 2a as notified in relation to land located to the south of Tara Road, Papamoa legally described as Section 19 SO 489379, Sections 25, 26 and 27 SO 457368.
		72	9	Nga Potiki a Tamapahore Trust	Map 2B appears to show the subject land as LUC 2, which is identified as Highly Productive Land under the National Policy Statement for Highly Productive Land. It is acknowledged that whilst the land is mapped as Class 2, this will require site specific investigation and NPaTT acknowledge the go carefully approach here. Adopt Map 2b as notified in relation to land located to the south of Tara Road, Papamoa legally described as Section 19 SO 489379, Sections 25, 26 and 27 SO 457368, with caution that site specific land use capability assessment will be required.
	2: Support	30	2	Wallen, Bruce	Sea level rise with subsequent inundation of Papamoa and the Mount are likely in the future either from rising groundwater tables levels or flooding by runoff to low lying areas, and possibly tsunami. Make a clear stand NOW and state new building restrictions (setback) for coastal areas that restrict use of low lying or flat land. This will be unpopular but will direct development thinking, so rather a hard decision made now than wait and have to deal with issues such as buyouts of flooded houses, aka Auckland, Hawkes Bay.
		46	1	Sadler, Jon	There seems a fundamental assumption amongst policy makers and planners in Tauranga that the large majority of people want growth. They don't. Growth in Tauranga certainly doesn't mean per capita increase in wealth and well-being. Resilient and sustainable places require green corridors and belts, and a focus on environmental and sustainable resource design and build, with pre-planned associated roads and infrastructure.
		47	7	Fitter, Julian Richmond	"This phrase does not make sense. If an area is to be protected, it should not be developed at all! Any development needs to be done carefully, the alternative is unthinkable - I hope."
		53	14	Bowden, Beth Willard	The maps make the clear point that, despite the acknowledged desirability of the Bay of Plenty as a place to live, that all of the 'easy land' is already in use. In other words, geography has already imposed a limit to growth. The so-called "Growth directives" on page 51 therefore seem mis-titled.



Smartgrowth Strategy 2023 - Summary of Submissions

Topic	Issue	Sub ID	Sub Point	Name	Summary
		54	1	Robson, John	No
		74	3	Waste Management Nz Ltd	General growth directives that seek to avoid development in areas that are at risk from natural hazard risks, where possible. Waste Management's submission is focused on its concerns to ensure that a blunt, blanket approach to development in areas at risk of natural hazards is not created through the SmartGrowth Strategy, particularly where the risk of natural hazards on development can be adequately and appropriately mitigated.
		74	5	Waste Management Nz Ltd	While Waste Management is generally supportive of the approach to avoid areas at high natural hazard risk, Waste Management is also conscious that there are a range of existing incentives on landowners and infrastructure providers to ensure that any future development occurs in a way that appropriately manages those natural hazard risks. Council's approach to blacklisting areas that could potentially be developed, subject to appropriate natural hazard mitigation, is overly blunt, especially when an appropriate engineering solution could be put in place that appropriately manages the risk. Given the shortfall of existing industrial zoned land within the sub-region, Waste Management considers a pragmatic approach is necessary in this regard. In developing an approach to managing development and land use in areas subject to natural hazards, the SmartGrowth Partnership must consider other incentives on landowners and infrastructure providers to provide for high quality developments that address, manage and mitigate hazards (for example, recognising the greater stringency of building standards with regard to obtaining building consent or insurance). Waste Management considers that it is critical that the SmartGrowth Strategy does not unnecessarily constrain development and land use of its sites, particularly where other alternatives are available to manage those natural hazard risks.

Smartgrowth Strategy 2023 - Summary of Submissions

Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-02: Tangata whenua	1: Partnership	5	2	Goodley, Wayne	Listen to our Tanga when ya.
		7	2	Angela	Ensure the mana whenua voice is central
		29	1	Cole, Julie Margaret	You have no right to come into our country and tell us how to live. Best you back out and leave as quietly as you snuck in.
		53	19	Bowden, Beth Willard	I defer to local iwi's rights and responsibilities to determine their own attitudes to this Strategy. • I endorse Pirirakau's submission, particularly at paragraphs 13, 14 15 and 24 • I draw your attention to my previous remarks concerning tangata whenua's involvement in planning assumptions made about Maori land use and availability for development
		69	1	Pirirakau Tribal Authority - Incorporated	7. The development of the SmartGrowth Strategy relies on tangata whenua representative groups to inform the work of Smartgrowth relying on 1-2 representatives.  8. The SmartGrowth Strategy information available for the past 12 months details presentations and Combined Tangata Whenua Forums meeting agendas where this details the absence of Pirirakau participation.  9. 'Others' continue to make decisions with very little engagement of consultation. Tangata whenua collectively are not resourced to engage at the required level other than meeting fees of tangata whenua resourcing.  10. The tangata whenua representatives are presented with information not consulted minutes prove the low level of opportunity to engage as well informed or appropriately.
		69	7	Pirirakau Tribal Authority - Incorporated	25. Tangata Whenua engagement is not acceptable in its current form as a tick box undertaking. As outlined the Tangata Whenua representatives within the forums are presented with information that is not shared or discussed widely with their people and Councils know this. 26. As the SmartGrowth Strategy is an official proposal requiring procedural outcomes involving further submissions. Th Smartgrowth Strategy while having some positive outcomes is OPPOSED until a working group is formed and meetings are held with wider Pirirakau hapu and local community is OPPOSED. Please enable the appropriate engagement on this strategy.
		72	12	Nga Potiki a Tamapahore Trust	Adopt the outcomes on page 60 as notified.
		86	1	Ngai Tukairangi Hapu Trust	The decisions made regarding accommodation, infrastructure, and initiatives directly influence our community and, by extension, our whanau. We firmly believe that meaningful engagement with our hapu is essential to developing strategies that are culturally sensitive, sustainable, and inclusive. The new plan should provide for opportunities where Ngai Tukairangi can thrive alongside the future growth initiatives that are being implemented within our rohe.

Smartgrowth Strategy 2023 - Summary of Submissions

Topic	Issue	Sub ID	Sub Point	Name	Summary
	2: Capacity and capability	86	13	Ngai Tukairangi Hapu Trust	5A. Ngai Tukairangi hapu endorse SGS's dedication to fostering cohesive collaboration with their partners and tangata whenua across diverse projects and commitments. We recognise the complexity of engaging numerous stakeholders throughout the Bay of Plenty region, and we are genuinely appreciative of the efforts made in this regard thus far.Continue to ensure Ngai Tukairangi hapu are partnered in discussions about any developments within our rohe.
		60	4	Tangata whenua collective (CTWF workshop)	<ul style="list-style-type: none"><li>• Strategy implementation is critical and needs to be resourced well.</li><li>• Support reference to CTWF outcomes and proposed Marae Centres and Maori Land Development Focus. SmartGrowth needs to ensure that this is adequately funded so that it is as successful and results in tangible outcomes for our people. Need to build capacity and capability within tangata whenua to ensure success is long-lasting. Matapihi would benefit from tangata whenua-led spatial planning.</li></ul>
		69	3	Pirirakau Tribal Authority - Incorporated	12. Pirirakau kaitiakitanga of its rohe has been subsumed by others in terms of decision making where Pirirakau are absent, and they have been largely excluded of SmartGrowth. This continues to threaten the 'hau kainga ahikaroa' (the practice of the true home and its people) of tangata whenua.
		69	6	Pirirakau Tribal Authority - Incorporated	23. We have an industrial area in Te Puna which is the highest population area of Pirirakau hau kainga that was not supported and we continue challenges against future development of outcomes imposing greater traffic movements, harder environmental impacts where the Hakao continues to flow as an area of the largest local environmental contention at this time. We want to better understand and participate in the influences that build urbanisation. The SmartGrowth Strategy has become a flagship that continues to propose further impacts, and no one is listening. 24. As Pirirakau and local community (Te Puna Heartlands) wish to engage directly in the future outlook of the rohe. We seek support for a working group to be resourced in our rohe - community to engage in depth in codesign of our future outcomes. To occur before the strategy is adopted. Te Puna, Huharua and Whakamarama being an OFF LIMIT plan within the SmartGrowth Strategy.
		86	6	Ngai Tukairangi Hapu Trust	5A. The significance of Marae centres: In many Maori communities, the marae serves as a central focal point where our whanau gather, especially during times of crisis, a fact notably highlighted during the challenging periods of COVID-19 lockdowns. Our marae/hapu communities, in response to the pandemic, consciously isolated themselves from the broader Bay of Plenty community for safety. During this period, it became apparent that our marae, while deeply valued, lacked essential resources and support to cater effectively to the needs of our whanau. It was a crucial realisation, as it underscored the necessity of bolstering our marae with adequate services and resources. Identifying these deficiencies was pivotal, illuminating the path forward. To truly empower and uplift our whanau within Matapihi, it is imperative that our marae be equipped with the essential services and resources required to fulfill the aspirations of our whanau, ensuring that our marae remains a resilient and supportive cornerstone for our community.5A(1) Provide for adequate response plans and practical resources for marae centres. Marae often play a huge manaaki role in times of crisis for ALL communities.
		86	7	Ngai Tukairangi Hapu Trust	5B. Maori health clinic: An example of this challenge lies in the accessibility of adequate health services for our whanau in Matapihi. A fundamental aspiration of Ngai Tukairangi is to eliminate the need for our whanau to travel extensively to receive general healthcare. It is disheartening to observe that some of our kaumatua must journey as far as Greerton to access health services from a Maori clinic. Despite the absence of readily available health services within Matapihi, the community is fortunate to have a health education service in place. However, considering the burgeoning population, there exists an urgent need for comprehensive healthcare solutions within Matapihi. 5B(1). In this context, the invaluable support under the SGS becomes pivotal. We urge Councils to actively facilitate and empower Ngai Tukairangi in establishing our own Maori health clinic within Matapihi. This endeavor is essential to ensuring that our well-being is perpetually prioritised. By creating a local healthcare facility, we aim to not only provide essential medical services but also foster a sense of belonging and security within our community. The establishment of a Maori health clinic in Matapihi represents a transformative step towards self-sufficiency and well-being, aligning perfectly with our enduring commitment to the holistic welfare of our people.

Smartgrowth Strategy 2023 - Summary of Submissions

Topic	Issue	Sub ID	Sub Point	Name	Summary
		87	11	Ngai Tukairangi Trust	- Strategy implementation is critical and needs to be resourced well. - Support reference CTWF outcomes and proposed Marae Centres and Maori Land Development Focus. SmartGrowth needs to ensure that this is adequately funded so thast is as successful and results in tangible outcomes for our people. Need to build capacity and capability within tangata whenua to ensure success is long-lasting.
		87	14	Ngai Tukairangi Trust	There is a need within the sub-region to better prepare hapu,iwi, marae and Maori land trusts for the expected growth. The Trust believes that when councils and other stakeholders are preparing for this growth, they need to also ensure Maori are able to prepare their own communities too. Not after councils, but leading into or alongside.
	3: Integration of maori values in Strategy	60	7	Tangata whenua collective (CTWF workshop)	• Don't forget the role of whakatauaki within the strategy. They are a reflection of our values based on our tupuna. For example: o Whatungarongaro te tangata, toitu te whenua - As man disappears from sight, the land remains. o Te oranga o te tangata, he whenua./he taiao - The health of the people is drawn from the land/environment. o He aha te mea nui te ao? He tangata he tangata, he tangata! What truly matters in life - it is the people, the people, the people!
		74	6	Waste Management Nz Ltd	Marae and Maori land development focus areas: Waste Management acknowledges its neighbours in the Bay of Plenty, including the Whareroa marae and recognises the aspirations of tangata whenua for Maori land and papakainga development in urban areas. Of relevance to Waste Management is the SmartGrowth Strategy's identification of the Whareroa marae and its surrounding area (including its Oil Recovery Site) as a Marae and Maori land development focus area. As recently submitted on in the context of the Mount to Arataki Spatial Plan, Waste Management acknowledges the desire to improve matters at the Whareroa marae. Waste Manangement is continuing to consult with local iwi and make sure that its operations are aligned with finding the right balance to enable industry while addressing concerns about any environmental effects. Waste Management considers there are opportunities for the Whareroa marae and adjacent focus areas to work with industry in a way that recognises the neighbouring industrial land use in the area, and to integrate any activities at the marae with those existing industrial land uses (ie avoiding residential development in proximity to industrial activity, and provisioning for appropriate land use buffers). Where careful and appropriate integration between land uses is achieved, Waste Management considers this would be a significant opportunity that will enhance the positive impacts on the Whareroa marae and adjacent development focus areas, providing for the Whareroa community's wellbeing.
	4: Oppose	54	2	Robson, John	No
	5: Support	59	6	Ministry Of Education	The tangata whenua chapter sets out aspirations for tangata whenua, including the challenges that are faced by tangata whenua in relation to growth and development.
		72	10	Nga Potiki a Tamapahore Trust	NPaTT generally support the Tangata Whenua Perspectives on Growth Management in tern of the economic, cultural, social, and environmental matters listed. Adopt the Tangata Whenua perspectives as notified.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		72	11	Nga Potiki a Tamapahore Trust	NPaTT generally support the principles of the NPS-UD as noted, including: <ul style="list-style-type: none"><li>• Well-functioning urban environments have a variety of homes that enable Maori to express their cultural traditions and norms.</li><li>• A Future Development Strategy must include a clear statement of hapu and iwi values and aspirations for urban development.</li></ul> Adopt the statements on Page 60 as notified.
		72	13	Nga Potiki a Tamapahore Trust	Adopt and acknowledge the issues listed on page 62 & 63
		72	14	Nga Potiki a Tamapahore Trust	Adopt tangata whenua growth directives as listed.
	6: Tangata whenua spatial plan	87	1	Ngai Tukairangi Trust	The Trust would like to highlight that it would have been more appropriate of both the SGS and MSP to engage with hapu first around whether a program of hapu management plan renewal could be conducted beforehand. We acknowledge that both projects have acknowledged existing planning documents, furthermore UFTI also commissioned a report on 'Tangata Whenua perspectives on Growth Management'. These efforts, however, are not quite the same as tangata whenua being able to determine for themselves, within their own dedicated plans what growth management will need to look like for them. There is also the issue of engagement fatigue which is a very real issue facing hapu and Maori land trust representatives. hap
		87	3	Ngai Tukairangi Trust	Why has the tangata whenua spatial plan not been completed and presented for feedback? The Trust would consider this should have been done first considering the visual representation in the SGS consultation book of it sitting above, and feeding into the SGS.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-03: Climate resilience	1: Managed retreat	7	1	Angela	Consider managed retreat for areas at risk of coastal inundation
		76	4	New Zealand Kiwifruit Growers	<p>We note that the SmartGrowth Strategy seeks to provide accommodation for a growing population, but we question whether the Strategy has appropriately considered the need for land to deal with the likely requirement for managed retreat. Presumably some houses that will be affected by coastal and river erosion and inundation will be able to be picked up and relocated elsewhere, and where relocation is not an option, the people who reside in those houses will still need somewhere to live.</p> <p>The SmartGrowth Strategy is currently silent on this, but consideration of the need for managed retreat, and where people will retreat to, will become an important consideration for the future.</p>
	2: Support	9	1	Wolf, Eva Maria Lieve	It gives me confidence that you're taking the right direction when I see that the Environmental objective is placed at the beginning of the four well-being objectives; growth always needs to be sustainable when it comes to the planet, we can't grow at the expense of our planet and therefore our future generations!
		22	3	Van De Weyer, Callum	Yes
		32	3	Mcleod, Whitiara	Yes, 70% out of 100q
		53	15	Bowden, Beth Willard	I have no particular argument to make with the description provided in this chapter, except to say that, at least until Cyclone Gabrielle earlier this year, there was only minimal evidence that its principles - and its costs - were being taken seriously. I do think the focus is on the right things, but I think that a sober assessment of likely costs by way of an Implementation and Funding Plan is seriously lacking.
		55	9	Holyoake, Peter	Please hold in mind, during future decision processes, the speed at which climate change is bringing weather extremes to all parts of the world.. The demand for additional accommodation in BoP will grow as other areas of Aotearoa become uninhabitable - the relatively sheltered location of Tauranga and WBoP will be increasingly sought after. The importance of incorporating climate resilience into all future developments cannot be overstated. Making this resilience passive (not requiring a power source) or self-sufficient (power and water generated on site) will avoid the losses of supply already seen recently in Wellington, Auckland and Nelson storms and floods.
		59	7	Ministry Of Education	<p>5.3 Climate resilience</p> <p>The Strategy sets out its approach to ensuring that growth is managed in a way that addresses climate resilience. The approach includes promoting compact mixed used urban development, connected centres and dedicated transport corridors, higher densities, intensification of areas and mode shift towards more sustainable travel. The Ministry supports the intent of the Strategy and the proposed approach. It will be important to ensure that climate change resilience - including climate change mitigation and adaptation - is at the heart of any decision-making in relation to the identification of greenfield growth areas. Dispersed greenfield growth would not assist in achieving the climate resilience outcomes of the draft Strategy. Retain the growth directives as notified.</p>
		86	3	Ngai Tukairangi Hapu Trust	3A. Ngai Tukairangi hapu fully supports SGS's commitment to ongoing research projects and the continual updating of data related to environmental and climate effects. This dedication to accurate findings ensures that communities can stay informed about the conditions of their living areas and the effects of the environment and climate. We appreciate the efforts made to keep the community informed and empowered with knowledge.
	3: Oppose	6	4	N/A, Linda	NO

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		27	1	N/A, Richard	No. Climate change needs to be at the centre of all thinking. Where we live and how we get around.
		28	2	Thorpe, Andrew	No
		37	1	Lois	No.
		47	11	Fitter, Julian Richmond	I see very little evidence that this strategy is really taking into account the environmental and climate issues, and ceratyoanly not the risk from sea level rise or tsunamis.
		47	9	Fitter, Julian Richmond	This has to be the key to everything. Growth in itself is damaging to the environment and the climate, therefore we need to seek at all times to minimise the impact of growth on our climate - there is no evidence that this has been taken into account in the document."
		50	4	Lucas, David Thomas	I believe there are better projects to spend our hard earned money on, than the so called climate change. We humans here in NZ are not going to make one scrap of difference to the overall world climate problem, if there is one.
		54	3	Robson, John	No
		62	6	Envirohub	Climate Change; The issues relating to Climate Change are referred to throughout the document. They receive strong focus in Chapter 03 of the Spatial Plan. We note in particular the introductory paragraphs of the Chapter. However despite these words the 'ecosystems and biodiversity' principle is not noted in many of the Spatial Plan Chapters. This needs to be remedied. As well there is scant mention of any Mitigation approaches which could, if funded and implemented save Councils millions of dollars in Adaptation projects over the 50 year period.
	4: Climate action	46	3	Sadler, Jon	More emphasis should be put on carbon footprint in building infrastructure and homes. Carbon consuming materials such as steel, concrete and polymers such as polystyrene should be discouraged, and wood and recycled products, and other natural fibres encouraged
		46	4	Sadler, Jon	Local government needs to build partnerships with organisations to provide incentives for businesses to be carbon neutral or carbon positive, and disincentives for operating heavy carbon footprints. Building resilience by offering incentives for small-scale businesses to operate locally to avert congestion and emissions encouraged
		55	1	Holyoake, Peter	The Strategy Document makes mention of most of the important impacts of climate change and correctly starts with recognition of the importance: "Climate change is the biggest challenge of our time". However, there is no plan of action to address the large contribution to climate change from agriculture in WBoP. 4. SOCIAL - Location of Marae CONCERN: Many Marae are located on land close to sea level. This land and these Marae will flood before most Pakeha settlements. RECOMMENDATIONS: a). Anticipate the flood of BoP's Marae, where they are close to sea level. Some marae are already experiencing floods. Plan and budget to assist the relocation of these marae.



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Topic	Issue	Sub ID	Sub Point	Name	Summary
		55	3	Holyoake, Peter	6. ENVIRONMENTAL - Storm surge, future rainfall and future development locations CONCERN: This concern is most relevant for coastal developments and for developments on flat land, near watercourses. The KRUGA is raised above sea level, with few flat areas. Parts of this development area are up to 100 metres above sea level. This is positive in that it will provide urban expansion areas, which are more climate resilient than existing and recent urban expansion areas around Tauranga. For example, Climate Central published a world map in 2019, which shows projections of flood areas for the year 2050. This map is discussed in a 2020 Newshub article (see link below) The emissions from the agriculture sector are high in New Zealand and WBoP. Yet recieve little mention in this Strategy Document.
		71	1	Zespri International Limited	4. CHAPTER 3: CLIMATE RESILIENCE 4.1 Zespri supports the climate resilience principles and growth approach, which align with the Kiwifruit Industry Climate Change Adaptation Plan1 released late last year. In addition, Zespri would like to see a focus on regional electricity generation and transmission, enabling decarbonisation and accelerating electrification. Investment and priority given to this would: <ul style="list-style-type: none"><li>• Address the electricity infrastructure deficit and increase supply,</li><li>• Ensure electricity supply is ahead of demand,</li><li>• Give the business community confidence to invest in electric plant and equipment,</li><li>• Support population social, environmental and economic wellbeing, and</li><li>• Accelerate electrification, supporting regional decarbonisation and the transition to a low-carbon economy.</li></ul>
		71	9	Zespri International Limited	5.16 Zespri has identified international shipping as critical to reducing our emissions footprint as we work towards our goal of being carbon positive to retail by 2030: we need transformative port infrastructure to achieve this. If larger more-efficient ships can't call at New Zealand ports, exporters will pay more into various ETS and our reputation as environmentally conscious trading partner will be tested. We are working on a green shipping corridor opportunity with one of our shipping partners to drive this work - if successful, it's likely to be the world's first green shipping corridor driven by a customer rather than a port.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		86	4	Ngai Tukairangi Hapu Trust	<p>3B. Emergency response: With the current impact and effects of climate change, it is imperative to plan ahead and develop strategies to mitigate against the effects of climate change within all areas we are associated with. In particular, Whareroa and Matapihi are particularly vulnerable to the adverse effects of climate change, including rising 3B(1). The Whareroa and Matapihi community needs to be prepared for emergencies that may disrupt our water supply. The SGS can play a crucial role in supporting the installation of emergency water storage systems to ensure a safe and reliable water source during times of crisis. This could include rainwater harvesting systems, water tanks, a sea levels, changing weather patterns, and increased frequency of extreme weather events. To adapt, it is imperative to invest in resilient infrastructure, develop early warning systems, and support community-led initiatives that enhance our ability to withstand climate-related challenges. Additionally, there is a need for comprehensive disaster preparedness plans that are culturally sensitive and inclusive of matauranga Maori.reservoir and other infrastructure to safeguard our community's water needs in the face of climate-related challenges.</p> <p>3C. Waste management: Waste management is a significant aspect of our community's sustainability efforts. Implementing a robust recycling and composting program is essential. By reducing our waste, recycling materials, and composting organic matter, we can significantly decrease our carbon footprint. Having efficient systems in place also ensures self-sufficiency and sustainability within the Matapihi community.</p> <p>3C (1). The SGS can support Ngai Tukairangi in establishing and promoting these programs, providing education and resources to encourage active participation from residents. By doing so, we can minimise landfill waste and promote a circular economy that conserves resources and mitigates the impacts of climate change.</p> <p>3D. Effects of erosion: As Whareroa and Matapihi sit adjoined to inner harbour elements, we are prone to the effects of erosion. Some of the areas that are susceptible to erosion in Matapihi include Te Tii urupa, Otumoko urupa and Omanu urupa. Other known areas along the Matapihi peninsula include Oruamatua, Te Ngaio and other historical pa sites. Priority for restoration should focus on urupa to ensure that desecration of gravesites does not occur. Whareroa in particular is 3D(1). Ngai Tukairangi should be supported in the replanting of those banks, as well as planting of native plants/trees along the banks to reduce the risks of erosion on our whenua. We should also be able to proactively advance our own ideas in relation to erosion efforts.subject to erosion with the dissipation of sand on the shoreline.</p> <p>3E. Hapu driven initiative: Ngareta Timutimu, a Ngai Tukairangi descendant has progressed an initial project to address climate control projects within the older areas of the Mauao/Matapihi peninsular and the respective communities. The initiative taken by whanau to assess the local takutai, focusing on the impacts of climate change such as erosion, rising sea levels, and their effects on the foreshore and kaimoana, demonstrates a proactive approach to understanding and mitigating environmental challenges.</p> <p>3E(1). The SGS can provide support by offering expertise in environmental impact assessments, providing data-driven insights into erosion patterns and rising sea levels, and suggesting innovative solutions. The SGS can assist in developing comprehensive climate adaptation strategies tailored to the unique challenges faced by Ngai Tukairangi hapu in Matapihi. Collaborative efforts under the SGS and Ngai Tukairangi hapu can lead to the creation of holistic, culturally sensitive climate resilience programs. By combining traditional knowledge with modern scientific approaches, we can develop initiatives that not only protect our environment but also preserve our cultural heritage and sustain the livelihoods of our community.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
	5: Heat management	55	2	Holyoake, Peter	<p>5. ENVIRONMENTAL / SOCIAL - Heat Management - public spaces</p> <p>CONCERN: Summer temperatures will continue to increase in future years.</p> <p>The use of dark horizontal hard surfaces, like asphalt, will create very hot areas and lead to heat islands. See the public comment on the use of asphalt for the new Papamoa Beach walkway (e.g. <a href="https://sunlive.co.nz/news/327098-p--p--moa-residents-concerned-over-asphalt-pathway.html">https://sunlive.co.nz/news/327098-p--p--moa-residents-concerned-over-asphalt-pathway.html</a>)</p> <p>RECOMMENDATIONS:</p> <p>a). Avoid asphalt use.</p> <p>b). Consider extensive use of tree-lined streets and stands of trees to reduce heat build-up. Maximise the use of light-coloured parking areas and road surfaces to reflect light and heat.</p> <p>c). Consider the Australian trend to use white as a roof colour for Council, commercial and residential roofs.</p> <p>d). Avoid high rise buildings and heat traps - see the following article about Singapore (not all relevant as Singapore is a high-rise city) - <a href="https://www.nytimes.com/interactive/2023/09/18/world/asia/singapore-heat.html">https://www.nytimes.com/interactive/2023/09/18/world/asia/singapore-heat.html</a></p> <p>ENVIRONMENTAL / SOCIAL - Heat Management - residential</p> <p>CONCERN: TCC / WBoP sub-region is an area favoured by retirees, evidenced by the presence of many retirement villages and care homes. This sector of the population is particularly vulnerable to heat. Summers will be increasingly hotter in the future. (See, for example: <a href="https://www.theguardian.com/australia-news/2023/oct/01/sydney-smashes-1-october-heat-record-as-victoria-fights-bushfires">https://www.theguardian.com/australia-news/2023/oct/01/sydney-smashes-1-october-heat-record-as-victoria-fights-bushfires</a>) and <a href="https://www.theguardian.com/world/2023/aug/20/high-temperatures-central-us">https://www.theguardian.com/world/2023/aug/20/high-temperatures-central-us</a>)</p> <p>RECOMMENDATIONS:</p> <p>a). Require all new developments for older people to include passive cooling features - e.g. deep covered verandas, deep window eaves - to allow entry of winter sunlight into the building and exclude entry of summer sunlight. Note that future climate change will bring extended drought periods and loss of hydro power, so passive construction features will provide resilience to climate change.</p> <p>b). Consider the provision of tree-shaded walkways, especially near retirement villages.</p> <p>c). Consider the potential future use of community halls as "Cooling Centres" as has been done during recent heatwaves in the United States (see: <a href="https://www.washingtonpost.com/weather/2023/07/15/cooling-centers-limitations-heatwaves-cities/">https://www.washingtonpost.com/weather/2023/07/15/cooling-centers-limitations-heatwaves-cities/</a> ). This could include duplicate air conditioning systems, power generators (e.g. solar panels and battery storage), etc.</p> <p>d). Ensure that each Connected Centre has a community hall ready to provide this service.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-04: Te Taiao - Our environment	1: Air Quality	1	1	Ranjard, Louis	There is a real concern about air quality in the area, as demonstrated by some recent studies. We're talking about human health. This should be a top priority for the development of the region. I only see limited mention of it in the strategy, promoting green areas and replanting will help but not only, we need imposing standards in the industry and limit the traffic in the area until air pollution returns to safe levels.
		35	1	Low, Jason	Air Polluters need to move out of the mount industrial zone, as the air quality is terrible for the mount Maunganui suburbs health!
		91	19	Sustainable Bop Trust	9. Why is the polluted air shed at the Mount not addressed? Isn't the Strategy the place to look at options to move the polluting industry away from schools and houses?
	2: Waste management	2	3	Smith-Kerr, Stephanie Heather	There needs to be a bigger push for industrial environment protection all these houses being built and all the waste.
	3: Support	17	2	Pirere, Tania	It's amazing how our local doc have been out there looking after our tupuna and making sure that our whenua and Moana are protected by our local wildlife caress
		32	1	Mcleod, Whitiara	Yes,
		59	9	Ministry Of Education	The Ministry is supportive of the approach outline in the Te Taiao/Our Environment chapter which emphasises the importance of growth within environmental limits, the maintenance or restoration of a full range of ecosystems, and the development of an interconnected network of open spaces, reserves and ecological corridors. Retain the growth directives as notified.
	4: Oppose	20	1	Chalmers, Nick	How will growth in our area effect resources particularly kaimoana. How will environmental impact of this growth be negated?
		20	2	Chalmers, Nick	How will you negate inevitable pollution caused by growth? What effects do you foresee this growth having on natural resources, in particular kaimoana?
		32	2	Mcleod, Whitiara	but with one glaring omission, data that will indicate whether Te taiao can accommodate the current municipal water take & future municipal take, Mairano.
		47	1	Fitter, Julian Richmond	The plan makes all the right noises, but the reality of the detail is that no real priority is given to the environment or enhancing native biodiversity. The Te tumu development is right alongside the most significant river in the region with an important wetland on the opposite bank - it is not realistic to think that such a development will not have a deleterious effect on the river and the wetland - in addition there is the inevitability of another river crossing being build in the future and the additional danger of some form of marina development should Te Tumu be developed as planned.
		53	16	Bowden, Beth Willard	Once again, no-one could argue with description provided but the growth directives seem highly qualified and privileging of human settlement ambitions. And it is barely plausible to offer a directive offering "growth of the western Bay of Plenty [to be] within environmental limits". • What does the term "environmental limits" even mean?

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		54	4	Robson, John	No
		62	5	Envirohub	<p>The effects of development and the degrading of environmental systems are noted in Chapter 05 Rural especially the loss of wetlands. This is even more so for TCC but is hardly mentioned. Both councils have opportunities to remedy environmental degradation but it needs to be a primary focus not just an afterthought. In the case of TCC the Otumoetai Spatial Plan is used as a case study. It does not mention the environment, yet the concept of environmental enhancement and green corridors for climate change and biodiversity were a key part of discussions for this plan. The transformational shift in thinking and action must place green infrastructure in the same scoping space as built infrastructure. Ecosystems are not an add-on, they are fundamental.</p> <p>To that end, Envirohub notes that in the Integration grey boxes 'Integrate and enhance local ecosystems and biodiversity' has been omitted as it largely has from the growth directives in Chapters 05 to 08 and Chapters 10 and 11.</p> <p>We request that an appropriate environmental growth directive be added to each chapter and the Integration statement on local ecosystems be included in each grey box.</p>
		69	5	Pirirakau Tribal Authority - Incorporated	<p>21. The Taiao implications against the SmartGrowth Strategy are hugely significant and the Strategy enables and influences this direction. Look to the city at the waterways and how they are largely modified and controlled for flooding management. Look to Omokoroa to see how this is also happening. This is not the Taio that is promised to Pirirakau against historic confiscation and the impacts on our natural environment.</p> <p>22. The Takitimu North Link was supported to enable State Highway removal from the local community of Te Puna to best protect the balance of the rohe from Urbanisation. Becoming a catchment that laterally dissects the rohe and wai movements are manmade controlled except where Pirirakau were successful in forming agreements to bridge sections where natural flow continues. Of the balance we seek greater recognition and actions provided for by the NPSFM and NPSIB.</p>
	5: Water quality and management	60	2	Tangata whenua collective (CTWF workshop)	<ul style="list-style-type: none"><li>• Is there sufficient capacity within the natural environment to handle more people? Is there sufficient water supply for a growing population? We need to ensure that our waterways and aquifers are kept healthy and not stressed by overabstraction.</li><li>• Need to ensure a whole systems approach, from maunga ki te moana.</li></ul>
		87	15	Ngai Tukairangi Trust	<p>Does the SGS consider how the implementation of Te Mana o te Wai and the National Policy Statement for Freshwater Management (NPSFM) may be constrained with the predicted urban growth? The Trust would also be interested in a collaborative approach to understanding how the sub-regions Maori land trusts with horticultural/agricultural/energy nterests (dependent on freshwater) could be impacted by restricted access because of urban growth.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		87	4	Ngai Tukairangi Trust	Within our orchard business, the Trust is undergoing going work to understand the different regional challenges for our orchards, with special consideration given to freshwater quality, allocation and use. Water is fundamental to our orchard operations, and without adequate access to water our business is simply not viable. The impacts of such would be detrimental to our ability to provide cultural, social, economic and health support to our whanau through financial assistance. There are also numerous other considerations that must be incorporated into urban planning processes to help cities effectitvely manage and protect freshwater resources such as 1. Drinking water supply 2. Wastewater and stormwater management 3. Sustainable water use a. Water conservation, efficient irrigation, reclaimed water for non-potable purposes. 4. Ecosystem conservation 5. Integrated land-use planning 6. Climate change resilience 7. Public education 8. Emergency preparedness
		87	9	Ngai Tukairangi Trust	- Do we have sufficient capacity within the natural environment to handle more people? Is there sufficient water supply for a growing population? We need to ensure our waterways and aquifers are kept healthy and not stressed by over abstraction. - Need to ensure a whole systems approach, from maunga ki te moana.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-05: Rural	1: Oppose	8	1	Goodall, Andrew David	No
		12	3	N/A, Haley	Dam well look after our famers who produce our food! Stop taxing them into desolation & ruining them with rules & regulations!!
		53	3	Bowden, Beth Willard	Given that the rural hinterland is such a large part of the region, it receives relatively cursory analysis in the Strategy. The sense of value, however, that the Strategy places on this land is important. In my view there exists considerable scope for building stronger understanding between city and country communities of their mutual reliance on each other.
		53	5	Bowden, Beth Willard	The Strategy implies, but does not make explicit, the important contribution made by rural communities to environmental protection and conservation. This already provides a well-established coalition of interests between urbanites and country folk and should be acknowledged
		54	5	Robson, John	No
		62	4	Envirohub	The spatial assets of Western Bay and Tauranga City are very different. For instance, Western Bay has 16 times more land mass than Tauranga City. whilst land in TCC is constrained, Western Bay has options to be flexible if the effects of climate change and the growth of town centres necessitate the movement of agricultural and horticultural enterprises. Tauranga City, in contrast, has few choices when it comes to land availability.
		79	3	Upper Ohauti Landowners Group	The Landowners Group agree with the general direction of the SmartGrowth Strategy and the growth directives in the Rural chapter. However, the Landowner Group believes that rural residential living options have been inadequately accounted for, that demand will exceed the projected supply and that provision in SmartGrowth mapping is appropriate and desirable to identify potentially suitable lifestyle areas.
	2: Support	10	3	Underwood, Ruth	Yes. Really important to retain suitable land for the key local industries. There is a narrow range of suitable sites for our key kiwifruit and avocado industries, in terms of elevation, soils, terrain etc. Once it was citrus, but that has a similar requirement to the current key crops. This land is relatively easy to develop into housing in terms of site factors, so needs 'planning' protection to support the economic basis for the region.
		76	5	New Zealand Kiwifruit Growers	Map 3 is already showing the potential for future growth on areas of Highly Productive Land. We submit that where possible, Highly Productive Land should be protected for appropriate land use such as kiwifruit growing, and we urge the Committee to keep this in mind as they consider the challenges ahead and the need to identify future land areas for housing.
	3: District / City Plan matters	34	1	Foster, Andrew William	Unlocking more housing options for rural property's. Ie 10m from boundaries on smaller blocks as the restrictions make it too hard. My neighbour has an illegally build shed so I can't build closer than 30m from the boundary on my small 1.3ha property. Even though both neighbours have built on the boundaries. Neighbours won't sign off a minor dwelling so unless i build in the middle of My paddock there's no options.
		53	28	Bowden, Beth Willard	Monitoring and enforcement of land use rules requires to be accepted as an active aspect of Councils' work. Over-reliance on a complaints process generated by vigilant members of the public allows too much latitude to rogue operators.



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Topic	Issue	Sub ID	Sub Point	Name	Summary
		79	1	Upper Ohauti Landowners Group	The Landowner Group submit that the SmartGrowth Strategy should consider as supplementary to the primary focus on urban intensification, provision for lifestyle zoning where it meets appropriate criteria, including SmartGrowth objectives. Effective structure planning would be a critical component of planning for lifestyle areas to ensure appropriate servicing, access, connectivity and provision for ecological enhancement.
		79	2	Upper Ohauti Landowners Group	The Landowner Group submits that lifestyle or 'rural residential' provision is integral from a SmartGrowth policy development perspective to prevent further ad-hoc fragmentation of these areas. The Landowner Group acknowledges the WBOP District Plan distinction between rural residential and lifestyle zones, with the former generally requiring urban-style provision of services such as water and wastewater. The Landowner Group believes this is an important distinction because the implications (particularly cost) of requiring that extent of infrastructure are significant. The lifestyle zone provides a level of self-sufficiency from a servicing perspective and this approach may be more appropriate in the context of the SmartGrowth objectives.
		86	5	Ngai Tukairangi Hapu Trust	5C. Matapihi rural status: Matapihi's designation as a rural area was a deliberate choice advocated by our whanau and community members, aimed at safeguarding our rural character and preventing extensive urban expansions or residential subdivision projects. Preserving this rural identity is paramount to maintaining our community's integrity. However, this intentional rural status poses a challenge when it comes to implementing essential infrastructure improvements necessary to accommodate the burgeoning population within Matapihi.5C(1). Through the SGS, we can work collectively to develop tailored solutions that cater to our growing needs while respecting the rural character we hold dear. This might involve advocating for specific exemptions or modifications within the rural zoning regulations, allowing for targeted infrastructure improvements without compromising our rural integrity. The fundamental question that arises is: How can Matapihi balance the preservation of our rural status with the urgent need for adequate infrastructure to support our growing population? It is imperative that we find innovative and strategic solutions to address this dual objective effectively.

## Smartgrowth Strategy 2023 - Summary of Submissions

Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-06: Urban form and centres	1: Support proposed urban form and centres	2	1	Smith-Kerr, Stephanie Heather	Yes from what I've read. I think the urban centres will reduce traffic. As I know many cutting across town for activities. Having more local activities and centres will reduce the number.
		15	1	Kenyon-Slade, M	Yes, good for 70% of the Future development proposal, however the Tuaranga Council has been repeatedly warned that building expensive Council offices, Library, Museums, esplanade onto the sea ; can not, and will not be successful until such time that a large number of "new" multistory carparks have been built. We suggest 3 to 4 multi story carparks with capacity of 500 to 1000 cars spaced around downtown CBD. Please be warned until the carparks have been built It is a fools errand to think the public will cycle and take a bus from all around the city to visit and enjoy to all these new facilities.
		17	6	Pirere, Tania	Centers are good if you have heaps activities and his going on but maketu do not need those,they already have community Center and Houora that use Tobe used but not do much anymore, that te aware put there greedy hand in thepot
		25	1	Armstrong, Judy	Yes
		36	1	Brown, Monique	Yes, although we want to ensure we have more cycle ways, clean air pollution for our tamariki. Safe pedestrian crossings for railways near schools and wide footpaths. Absolutely love the new wide cycle and footpath along marine parade. Amazing
		39	7	Bennett, Pauline	Lifestyle: Plans base on evidence and principles A strategic platform for community outcomes by each council - Smart Sustainable Growth Forum (or re-establish SmartGrowth Forum. Urban Development: 15 to 20 minute sustainable communities
		40	2	Buhrs, Nicole	I fully agree with intensification of Te Papa peninsula but again it needs a plan and is not up to individuals to subdivide their property and put a 3-storey building in front of their neighbours without any consultation. That will produce more houses but surely not a 'liveable' city where neighbours live in harmony.
		55	4	Holyoake, Peter	I think that the Connected Centres approach makes for a very attractive character to the town centres of Tauranga and surrounds and I fully support the continuation of this approach. Although mentioned elsewhere in the strategy document, it is obvious that the provision of the frequent bus service between connected centres will facilitate the reduction of private transport and improvement in air quality as a result, improving the environment in each connected centre.
		59	10	Ministry Of Education	The Ministry supports the connected centres scenario with compact urban communities planned and supported through local structure plans, placemaking and urban design to achieve good quality social, cultural, economic and environmental outcomes.
		59	3	Ministry Of Education	4. Part 2 - The Growth Challenge The Ministry notes the significant challenges, but also the opportunities for the sub-region when planning for urban growth. The Ministry is supportive of the Connected Centres growth scenario which would see growth occurring in a more intensive way to support a well-connected, multi-modal transport system, and to plan around residents having access to social and economic opportunities within a 15-minute journey time and wider sub-regional opportunities within 30-45 minutes. Relief sought: Retain the Connected Centres growth scenario as notified.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		62	3	Envirohub	<p>The connected centres choice, which is potentially a long term sustainable option to accommodate growth, will depend heavily on the provision of public transport options and the persuasion of our citizens to make such options a first choice. Over the Smartgrowth period EV's etc will likely become the norm but this will not assist congestion on our roading network while the 'live learn work and play' concept becomes the way our communities work. Incentives to change current behaviour will certainly be required.</p> <p>The whole of the Bay of Plenty will continue to grow whether we like it or not. It is up to us to plan, as best we can forsee, for that growth to be within an enhanced environment and a thriving equitable society. We exist and prosper within of the natural ecosystem. If we destroy nature we will not be capable of "building our futures together".</p>
		73	3	Property Council New Zealand	6.1 Property Council broadly supports SmartGrowth's Connected Centres Development Strategy. We welcome high quality urban intensification, as our members know that it will help Tauranga and the wider Bay of Plenty achieve outcomes that meet the region's housing, environmental, social and economic ambitions. Property Council also welcomes the intent to encourage the development of thriving local and town centres that provide for greater social and economic opportunities for residents and businesses.
	2: Open space provision	2	4	Smith-Kerr, Stephanie Heather	Green space is packing in some of these potential high urban areas.
		27	3	N/A, Richard	What is happening with te tumu regional park. An asset that families flock to in the weekends and all summer.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		77	4	Socialink	<p>2. Provision and development of green space including public parks</p> <p>Green space is identified in the Strategy as important for a range of solid reasons. However there is limited mention about specific objectives and activities. We note that the transformation Goal 0.5 Restore and enhance ecosystems for future generations is the only one referring to the natural environment. However it does not specifically refer to green space/parks.</p> <p>Recommendation: Plan for an urban public garden/botanical garden accessible by all ages and abilities.</p> <p>We suggest the Growth Directives include mention of development and retention of land so people have access to green space public parks with trees, gardens and nature, no matter their income, age or mobility level.</p> <p>We believe it is important that the Strategy pushes for purchase or redeployment of land for a public park/botanical garden within the urban boundaries of Tauranga, as the largest regional city. A common feature of many cities is a large public park, often with a botanical garden that provides education and research efforts to help the local community with planting and gardening suitable in the local climate, and that are open to and accessible by all.</p> <p>Tauranga is very poorly off for such urban parks, presumably due to lack of visionary planning by our previous city councils. It is difficult to understand why land was not been set aside for this purpose during the various iterations of council since the 1960s. While the western Bay of Plenty area does have several parks outside the city boundary such as McLaren Falls Park and TECT Park, these are some kilometres away and only accessible by vehicle.</p> <p>(Other cities often have similar parks outside urban boundaries as well as their large urban garden park, so local authorities cannot use the existence of these two parks to say we have provided along the same lines as other cities).</p> <p>Perhaps too much emphasis has been put on the harbour and beaches as people's recreational places. These areas will be less accessible to many people in terms of hot climate, sea rise and the proportion of the population in the older age group.</p> <p>The Western Bay of Plenty is blessed with beautiful coast line, beaches, rivers and estuaries and opportunities for people to walk in native forests ('bush') such as in the Kaimai Mamakau ranges. However for many people such options are not what they will enjoy, or the sites are beyond their physical safety, mobility limits or they can't afford to get there.</p> <p>On the other hand, a large urban public garden will be generally reachable to all through private vehicle, bus, cycling or walking.</p> <p>Urban Tauranga does have large green areas such as Kopurererua Reserve and Carmichael's Reserve, with walking, cycling and wildlife and water management areas, cultural heritage areas and in the case of Carmichael's Reserve, a playground. However these reserves offer a different experience to green space public gardens.</p> <p>Public gardens such as botanical gardens are developed in a way that means they are more accessible and useable to all age groups, from infants to the very elderly as well as people with different levels of mobility and ability. They generally have multi assets such as sweeping lawns, places where people can picnic or sit comfortably, paths, large trees, gardens, glass houses, water features, sculptures, playgrounds and so on.</p>
		77	5	Socialink	<p>Tauranga city has many small reserves some of which fairly narrow and link one part of a suburb to another such as through The Lakes area or in Papamoa, but these are not particularly usable as green, treed and wide open space for people and their families to relax.</p> <p>All citizens and residents should have access to such a space that a public park can provide and it should be of substantial size. Not only is the aesthetic pleasure and enjoyment of such spaces with family or whanau, there are many health and wellbeing benefits to people able to be surrounded by and relax in nature, in gardens, amongst trees. As the Strategy notes on pg 96, 'Access to nature has benefits for people living with mental illness. A UK study found that people who lived in neighbourhoods with more vegetation and birdlife were less depressed, anxious, and stressed.'</p> <p>Access to such commons that public gardens provide will be particularly important when there is an emphasis in the built environment on intensification of dwellings, smaller sections and apartment living.</p> <p>Our public gardens and parks were set aside by forbears for the benefit of all, in the knowledge that it would take many years for trees to grow to stature. We believe it is well past time Tauranga had such a development.</p> <p>The Strategy notes there are pockets of deprivation and poverty, the most deprived areas being largely urban and close to the centre of Tauranga. They in particular will benefit from access to beautiful, treed public parks and gardens.</p> <p>Public gardens are also a golden opportunity to educate and demonstrate to the public about plants, gardens and the natural. They would also enhance the experience of living in the WBOP for the wider population as well as for visitors to the region.</p> <p>The current 85 ha Greeton Maarawaewae reserve/Tauranga Race Course area may be one option to develop. Unfortunately it appears to be one of the last remaining areas of land suitable for a public treed park within the urban area. Its contours mean it is relatively accessible however.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		77	6	Socialink	2. Further develop urban existing reserves, parks and esplanades In terms of building more opportunity for green space development that meets the needs of a more urbanised population, we suggest the 50 year strategy could include reviewing existing ways small reserves and parks belonging to the local Councils are used. Could they be repurposed with community input to enhance community connectedness, natural space enhancement, biodiversity of insect and plant life for instance? For example, Tauranga City Council's Reserve Management Plan lists 292 reserves, parks and esplanades. Some of these have historical, cultural or natural significance. Others are quite small and perhaps could be developed into community gardens or allotment space still owned by Council but peppercorn rented to local residents.
		77	7	Socialink	The Strategy notes in terms of housing, connected living and that "many purchasers are not demonstrating a strong desire to "downsize". They are not yet seeing the value of living smaller but closer to services...It is imperative to build climate resilient communities, however the western Bay as a community does not yet recognise the benefits of the "15-minute neighbourhood", over the "quarter acre paradise". (pg 112) Provision of amenities such as quality public parks are likely to help enhance the benefits of living in more intensively developed urban communities. These ideas may be seen as too minor or too detailed, but the point we are trying to make is there are a range of things we feel could be encouraged as part of a 30 to 50 year plan that give optimism and hope to make our local places friendly, socially inclusive and liveable and at the same time be sustainable and supportive of nature.
	3: Oppose	24	1	Cooney, Graham	I have only read the executive summary. I do not see a description of what you want the Tauranga CBD to be. Presently many decisions are being made, implemented and financed without any comprehensive debate about "what is the vision for the CBD". Is it retail, entertainment, hospitality, business, accommodation - some of these or all of these? The present restructure of Cameron Road and proposed parking changes in the CBD to 11th Avenue area suggest that business and retail (definitely) and hospitality and entertainment (maybe) are not part of the plan. To an outsider looking on at the moment, present implementation suggests that TCC want to close down the CBD but there is a proposal to build a new city centre. It is very confusing and needs a well planned and informed debate before it is too late to change direction.
		25	2	Armstrong, Judy	Do not spread out, go up with buildings. We want green land and be able to grow crops
		27	4	N/A, Richard	Intensification can look awful when done in existing neighbourhoods on small sections. New subdivisions should look at how good intensification can happen, with multi-storey buildings and green space. All communities should have access to green space and large trees. How can larger plots of land in old neighbourhoods be opened up to development. In many cities, slum neighbourhoods are bought cheaply and intensification happens. We are not going to get to that stage and need another way around this issue.
		33	2	Sanderson, Nathan John	Review town centres: Tauranga CBD, Mount Maunganui CBD, Bayfair, Papamoa, Te Puke, Otumoetai, Bethlehem and Omokoroa.
		39	10	Bennett, Pauline	Stop Tauriko. Tauriko development - will lead to intergenerational debt. Intergenerational debt can not be serviced by an ageing population.
		39	8	Bennett, Pauline	Stop boundary development, commit 15 - 20 minute communities, commit to public transport. Plan for Elders and Young Maori. Develop communities that are self sustaining. Green spaces - set a space per household

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		40	1	Buhrs, Nicole	<p>I personally want to live in a "liveable" city where everything is close by, where I can bike safely, where I can take a form of door-to-door affordable public transport with no need for a car, where there are lots of trees and green spaces, where there is a community hub in the neighbourhood etc...</p> <p>If the region wants to plan for more people, it needs a PLAN. At the moment development is developer driven and that has led to suburbs with no soul, no community facilities, no shops at walking/cycling distance, no employment close by, standard one storey 3-to-4-bedroom houses, no provision for walking/cycling paths between streets etc...</p> <p>We have seen this happening in Rolleston where at some stage Selwyn District Council realised that the town centre had been 'forgotten'! No wonder if there is no plan before starting development. A town centre has now been created by taking part of the reserve. Houses that were no more than 10 years old and were built in a residential zone had to be demolished to make place for shops after the area had been rezoned commercial. What a waste of time/ resources and money!</p> <p>Under Norman Kirk in the 1970s there was a plan for developing Rolleston but there was no plan when Rolleston's development took off in the 2000s. What a disaster. Is this the kind of development we are going to see in Tauranga?</p>
		41	3	Mollison, Margaret Helen	<p>Intensification clearly needs to occur, but this needs to be in the form of affordable accessible and energy efficient houses, with a smaller footprint. There also needs to be a mixed model of accommodation, and an awareness of the ongoing issue of homelessness so that we can accommodate all groups in our city. Growth will have to be organic as sites gradually transition to higher intensity, ground stability needs to be assured, and people need to change their expectations from the NZ quarter acre dream. Red tape bureaucracy needs to be reduced to allow more affordable planning approval, at the same time as a robust city plan to ensure that developers are given clear guidance on acceptable development. Attention needs to be given to adequate green spaces and tree corridors to allow for recreation and community activities, good mental health, and the restoration of waterways and wildlife in the city. Good recycling and waste systems that have been initiated, need to be enhanced and entrenched. Industrial areas need to also be clearly demarcated to avoid urban sprawl and maximise land use. Renewable energy should be the norm, such as solar panels on all new builds.</p>
		42	6	Gordon, Carole	<p>2 Sustainable Hyperlocal Communities.</p> <p>The UFTI plan details a roading network of connected 'business' centres. The draft Strategy assumes that these circle sites somehow 'just become' interactive 15minute liveable communities supplying a network of essential services. Confusion exists.</p> <p>It is commendable that that a 15minute model is referenced (p101). However, the strategy fails to canvas a master plan for the development hyperlocal liveable communities, for live, work, learn play and age sustainable environments. It lacks a people heart. The commentary is probably insufficient to drive serious spatial plans to action a changed investment by partner Councils. A shift is needed to recognise and actively structure hyperlocal communities as a critical policy and process to reducing congestion and emissions, to build locality social and cultural, economic stability and social connectivity. The 15 minute or Hyperlocal community model is a proven outcome from commitment to intensive co-design processes that provide accessibility to essential services and social cohesion. It offers first and last mile mobility options to reduce emissions, includes vital intergenerational greenspace and access to health and social care services. The Strategy should adequately reflect planned investment in liveable age-friendly communities congruent with the New Zealand Aotearoa Better Later Life Strategy 2019-2034.</p>
		42	9	Gordon, Carole	<p>2.1 Reframe Strategy sections 6 and 10 to specifically to define and reflect a planning focus on hyperlocal 15min neighbourhood infrastructure development in a context of liveable intensified communities. Noting the difference between UFTI connected transit centres! The strategy( p101) makes this explanation clear, but conceptually it is not well integrated as a transformational shift for investment.</p>
		46	2	Sadler, Jon	<p>There is an assumption of planners that large-scale growth should be encouraged and accommodated. Most residents would disagree with this economic imperative. It provides no gain socially, environmentally or for most people in employment. There should be more of an emphasis on developing small and intimate business and social medium-density nodes that provide most of the social, economic and environmental services we need. Developing large urban sprawl that encourages massive growth and congestion should be discouraged. Planning for smaller-scale condensed settlements with a hub of services and alternative transport choices should be more encouraged.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		47	2	Fitter, Julian Richmond	Assuming tht the population growthw projections are valid, then there is a clear need to develop a much more cohesive housing and transport strategy. You suggest existing urban areas should aim for 30-50 dwellings per hectare, this is very low when it should be 50-100 if you are serious about developing affordable housing. Likewise that new growth areas should have a target of only 30 DPH, that is way too low. We know that we cannot develop an effective publiuc transport system if the housing density is too low -Serious densification is absolutely critical.
		53	4	Bowden, Beth Willard	I advocate for more and better inclusionary zoning principles to combat the ad-hoc 'creep' at the margins of peri-urban, industrial and commercial development areas by way of Private Plan Change applications. This is especially important if Connected Communities becomes an accepted element of the District Plan
		54	6	Robson, John	No
		57	0	National Council of Women	Connected centres do not always result in centres with community amenities unless there was a focus to achieve this goal. Strengthening communities is a significant step in achieving sustainability and wellbeing.
		61	6	Child Poverty Action Group	Connected Centres and UFTI: The current model has focused development into existing urban areas. We see rural areas remain relatively isolated due to lack of access to public transport and struggling without services such as affordable high speed internet connections. The WBOP has a significant rural population who are often disadvantaged.
		74	7	Waste Management Nz Ltd	Waste Management acknowledges that housing supply is an important issue for New Zealand, Tauranga and the Western Bay of Plenty subregion, and that it is appropriate that steps are being taken to address it by enabling intensified housing within the Tauranga urban area. However, it is essential that industry and infrastructure that supports well-functioning urban environments, are not adversely impacted by new, intensified housing and that future residents are located in appropriate living environments. The SmartGrowth Strategy expressly identifies the suburb of Arataki as an existing urban area intended for increased density and housing choice. 3 This area is directly across State Highway 2 from the Truman Lane Site. There is an inherent conflict within the SmartGrowth Strategy in that, while it recognises the need to provide for industrial land and outlines that the development and / or redevelopment of existing industrial zoned land will help meet the shortfall in demand, it also directs for intensified residential development in areas proximate to those existing industrial areas (including the Truman Lane Site and Oil Recovery Site). It is fundamental that that conflict is well-managed to ensure existing industrial activities can continue occurring without undue constraints, as well as to ensure that communities are located in healthy living environments. Intensified residential development built in proximity to industry and infrastructure, such as the Truman Lane Site and Oil Recovery Site, have the potential to give rise to reverse sensitivity effects, which can lead to constraints being placed on the activities being undertaken at those sites. While Waste Management is committed to being a good neighbour and endeavours to internalise as much of its effects as possible, the nature of Waste Management's operations (and acknowledging that this is the same reality for industrial activities more generally) means it cannot practicably internalise all of its effects in every instance, and any increase in the number of residents in proximity to its activities means an increase in the number of receivers of potentially adverse effects.
		75	8	Andrews, Julie	My question is, how will our local Councils achieve quality intensification if developers can opt for more profitable greenfields projects? I think the time has come for strong urban planning and incentives to counteract the developer led growth we've seen up until now. It's natural that developers will go where they can make the most profit most easily, so it's a matter of figuring out how to work with that. It's not new; - as you will be aware there are plenty of examples overseas where central and local government have been very strict on urban planning to ensure places are liveable, have sufficient greenspace, foster community, etc. The liveability aspirations are well described in the Strategy (eg at page 45 - "Liveability and placemaking", and at number 2 on page 83 which states - "Population growth and intensification increases demand for recreation facilities, open spaces, green space and parks").
		75	9	Andrews, Julie	The type of intensification selected for different areas is important. I and many others, much prefer the two or three storey townhouse-type homes that have popped up in Christchurch to 4 - 8 storey apartment blocks. This seems to be the "sweet spot". Back to the point about incentivising developers to choose intensification projects. One way of limiting sprawl and making intensification projects more viable is to turn off the tap on greenfields growth, or at least reduce it to a trickle (so maybe 3,000 homes in Tauriko which is the growth that Waka Kotahi is confident the current infrastructure will handle). Given that TCC's commissioned report concludes that the Reasonably Expected Realised number of dwellings for intensification (taking into account the commercial realities) is 19,000, deferring greenfields development to encourage intensification seems a feasible proposition.



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Topic	Issue	Sub ID	Sub Point	Name	Summary
		83	2	Bell Road Limited Partnership	<p>Bell Road LP's submission is that the Draft Strategy needs to adopt more enabling and fluid policy to enable the delivery of residential and employment land based on:</p> <ol style="list-style-type: none"><li>1. A corridor approach and the ability to efficiently deliver and service land with respect to infrastructure.</li><li>2. The completion of robust feasibility assessments to ensure that ultimately the development of land is actually possible, so that it can deliver housing and employment areas.</li><li>3. Sound engineering solutions which enable land to be developed.</li><li>4. All notable key areas should remain active and subject to further investigation, and therefore no short listing or preferred sites mindset should apply.</li></ol>
		84	4	Mcmaster, Bill	<p>1.16 Part 3 of SGS outlines the Spatial Plan which identifies areas for growth and areas to protect. I would suggest that the SGS should recognise the iconic nature of Mount Maunganui North as an area to be protected from high density intensification and seek to retain the generally low rise nature of this area.</p> <p>1.19 The proposed expanded Mount Maunganui Precinct (Mount North) however is an entirely unsuitable location for high density residential intensification and there are other locations in Tauranga much better suited such as the TePapa Peninsula. This will be borne out of the SGS is completed.</p>
		85	2	Tauranga Crossing Limited	<p>13. TCL disagrees with the proposed commercial centres strategy and the lack of distinction between the size, scale, and catchment of the centres. The Strategy has only identified City Centres, Town Centres, and potential town centres, which does not reflect the current or future reality of the commercial centres in the region. As such, the Strategy does not appropriately support the "Connected Centres" programme or appropriately implement the requirements of the NPS-UD, or the NPS. It will potentially hinder development potential and well-functioning urban environments as discussed further below.</p> <p>14. The NPS-UD requires a shift in thinking when planning for urban growth. In creating well-functioning urban environments, it is no longer efficient to have a "flat" hierarchy with the city centre at the top, followed by town centres. Rather, Objective 3 of the NPS-UD requires greater enablement of urban intensification in areas which have many employment opportunities, or are well-serviced by public transport, or where there is high demand for housing or for business land in the area. This requires a clear framework to be put in place to direct urban intensification to appropriate locations to support planned growth.</p> <p>15. The NPS-UD also encourages a nuanced hierarchy of development around urban centres (Policy 3, Policy 4). By not differentiating between metropolitan centres, town centres, and other types of centres, the Strategy does not encourage the "Key Growth Area" centres to grow to meet their potential. This is a lost opportunity to create a more efficient development pattern and does not align with the general objective and policy direction in the NPS-UD. A more nuanced centre hierarchy is required to allow each type of centre to grow according to its unique potential, role, and catchment.</p>
		85	4	Tauranga Crossing Limited	<p>19. As set out above, TCL disagrees with the proposed commercial centres strategy and the lack of distinction between the size, scale, and catchment of the centres. The Strategy currently identifies Tauranga Crossing as a "Town Centre" for the purposes of the commercial centres strategy. The NPS describes the Town Centre Zone as:</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		91	10	Sustainable Bop Trust	<p>A Flawed Growth Model</p> <p>We have reached the following interim conclusions:</p> <p>1) This is all being driven by an unsustainable growth agenda at central and local levels.</p> <p>2) SmartGrowth promised live-learn-work-play in local communities, but the opposite happened. Since SmartGrowth began, Tauranga has moved to a more centralised community infrastructure model for recreational and sporting activities (think Blake Park) and a dispersed model for educational facilities (e.g. PTEs), while consenting ongoing development of ribbon shopping strips and malls (e.g. The Crossing). Precisely the opposite was needed.</p> <p>3) UFTI is severely flawed.</p> <p>4) The SmartGrowth councils treat UFTI as an 'Old Testament' type of document that cannot be changed, resulting in some council staff explaining away environmental damage and substandard planning by literally saying "we've been told we have to implement UFTI".</p> <p>5) Councils need to revise UFTI to an updated ('New Testament') sustainability plan.</p> <p>6) UFTI initially stated that two rail-based urban development options scored highest in its objective analysis, saying a public transport based development model was the best option - better than a compact city with citywide intensification.</p> <p>7) What's more, UFTI clearly stated that a "Compact and connected city" was not an optimal model for Tauranga - it scored lower than all the other options except for "Dispersed growth" ("low density growth" with "a lot of unfocused cross movements to connect people between where they live, learn, work, and play") - clearly not a good option.</p> <p>8) Councils never explained why those rail options were downgraded in favour of a severely compromised "Connected Centres" option without rapid transit. The result is that UFTI is basically promoting sprawling, low-medium density development without any specific plan for rapid public transport connectivity. At a stretch, you could say it's transit based development without the transit = slightly-higher-density sprawl + high carbon transport.</p> <p>9) This Draft Strategy and Plan Change 33 could result in the worst of all worlds: lots more sprawl, high housing costs, high carbon emissions, worse congestion, higher energy consumption (blocked sunlight), lack of amenity, and poor quality of life (homelessness, social isolation, etc).</p> <p>10) This Strategy and Plan Change 33 need to reject the government's blanket medium density sprawl across both the existing city and new greenfields, by using the "enormous discretions" (MP Bishop) contained in the legislation, and only allow high density zones to be developed in defined areas where there is provision of connected rapid public transport.</p>
		91	15	Sustainable Bop Trust	Why are there contradictions between the SG Strategy and TCC documents, in regards to numbers and timeframes for new dwellings in Western Corridor?
		91	16	Sustainable Bop Trust	How does final shape of PC33 (and new government) influence this Strategy?
		91	9	Sustainable Bop Trust	Concerns About the Implementation of NPS-UD and PC33
	4: Commercial centre	81	5	Urban Task Force	It is essential for the Commercial Strategy Review to be completed on a subregional basis to achieve a consistent outcome. This work is overdue and needs to be led by Tauranga City Council and prioritised. The indicative Centre Strategy as set out, is woefully inadequate and further urgent work is required to be completed on this. The review needs to be based on collaboration with stakeholders from inception through to completion including the development community, taking into account any completed spatial plans.
		82	4	Batchelar, Craig	Tauranga Crossing appears to show as a 'Potential Town Centre' dot on Map 12, but table identifies it as a 'Town Centre'. Increase size of dot to match Town Centre.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		83	8	Bell Road Limited Partnership	Commercial Strategy Review It is essential that the Commercial Strategy Review1 be completed on a sub-regional basis to achieve a consistent outcome. This work is long overdue and needs to be completed by Tauranga City Council and prioritised The indicative Connected Centres Strategy as set out is inadequate and further urgent work is required on this. The review needs to be based on collaboration with stakeholders from inception through to completion, including engaging the development community and tangata whenua, and also taking into account completed spatial plans. Engaging with the development community after completion of the bulk of the technical work will miss key information and opportunities and is a recipe for future conflict and rework. This engagement should be included as a key action in the Implementation and Funding Plan. In the interim, all commercial centres identified through spatial plan processes or existing City or District Plan Centre Network maps should be included.
		83	9	Bell Road Limited Partnership	Commercial Strategy Review It is essential that the Commercial Strategy Review1 be completed on a sub-regional basis to achieve a consistent outcome. This work is long overdue and needs to be completed by Tauranga City Council and prioritised The indicative Connected Centres Strategy as set out is inadequate and further urgent work is required on this. The review needs to be based on collaboration with stakeholders from inception through to completion, including engaging the development community and tangata whenua, and also taking into account completed spatial plans. Engaging with the development community after completion of the bulk of the technical work will miss key information and opportunities and is a recipe for future conflict and rework. This engagement should be included as a key action in the Implementation and Funding Plan. In the interim, all commercial centres identified through spatial plan processes or existing City or District Plan Centre Network maps should be included.
		85	1	Tauranga Crossing Limited	12. Although it is acknowledged that the classification of centres may be subject to change following the outcomes of plan changes to the Tauranga City Plan and Western Bay of Plenty District Plan (and that further work is required in terms of developing a detailed sub-regional commercial centres strategy), it is important that the direction in the Strategy appropriately reflects the intended role and function of each centre in the sub-region. The Strategy once finalised will become an important document that will have an influence on other resource management processes in the future.
		85	0	Tauranga Crossing Limited	<p>The draft strategy assumed that people would be prepared to take a 30 to 45 minute journey to meet their sub-regional needs which was seen as highly inefficient. In most cities it took no more than 20 minutes, if not significantly less to meet those sub-regional needs. It was noted that 28% of visits to Tauranga Crossing came from outside of Tauranga city. However, TCC's evidence, in terms of how they had classified their centres, was focused on only what happened in Tauranga City.</p> <p>The 28% of visitors who came from outside of Tauranga city was twice the rate that Mount Maunganui drew from outside of Tauranga City. It was very much operating as a sub-regional centre, meeting a much wider range of needs than just the immediate and local catchments.</p> <p>Another drawback of this flat strategy/city form was that it led to replication of offer between all the town centres. There would be no ability for some of the larger retailers to meet the wider needs of the sub-region by providing larger outlets in sub-regional or CBD locations. In order to meet the needs of the entire population, they would have to provide smaller stores if possible, within many centres. This was an inefficient way for a city to operate which did not allow for any significant conglomeration benefit, where other business would choose to co-locate with some of the larger activities that could occur in metropolitan centres.</p> <p>It was understood that some of the restraints placed on Tauranga Crossing related to the impact to the CBD. It would require an additional 90 thousand or more square metres of Gross Floor Area (GFA) zoned at Tauranga Crossing before there would be a ten percent impact on the CBD. In Mr Akehurst's opinion, this was not a risk that should result in significant constraints being placed on Tauranga Crossing.</p> <p>In looking at the SmartGrowth Strategy, the concern was that the existing classification of the town centre, in grouping all of these things together, there may be other centres that were more important in terms of accommodating that growth relative to the various growth areas. It was important that this was recognised within this strategy, one of the key reasons being that funding was a significant risk to a lot of the growth that had been forecast. Critical to this funding was having the right centre hierarchy to direct where the funding should be prioritised so that there would be some areas that would be more important in terms of funding and infrastructure. The metropolitan area of the Tauriko commercial zone, recognised as a sub-regional centre, would be very important in terms of directing where all the funding and infrastructure needed to go in and around that area. This needed to be recognised in the strategy.</p>

Smartgrowth Strategy 2023 - Summary of Submissions

Topic	Issue	Sub ID	Sub Point	Name	Summary
		85	0	Tauranga Crossing Limited	In economic evidence presented on behalf of Tauranga City's District Plan Change 33, Mr Heath identified that Tauranga Crossing will require a further 1.5ha of land by 2033 and 3.1ha by 2043 in order to accommodate anticipated growth in the Western Corridor and beyond that is likely to be focused on the centre. This makes it the fastest growing "Town Centre" in Tauranga, while still ignoring the sub-regional role the centre plays across Bay of Plenty Region and even into the Waikato, this is discussed further below." "Within the PE report, Tauranga Crossing is classified as a Town Centre. Currently the TDC centre hierarchy has the City Centre then Town Centres, Local Centres and Neighbourhood centres. Tauranga Crossing is the 5th largest developed Town Centre (out of 8) in terms of the land area (Zoned extent in ha according to PE) at 13.4ha. However, based on PE's assessment of growth, by the end of the study timeframe (2043) it is the largest developed Town Centre, at 23.1ha (excluding The Sands which has area zoned but is not developed)." "A key rationale put forward by Tauranga City Council in PC33 as to why they do not consider Tauranga Crossing to be a Metropolitan Centre is that it does not have a walkable catchment, and therefore it is not suitable for additional density. However, given Tauranga Crossing's current role in terms of meeting wider needs across the sub-region, there is no reason why providing for residential to co-locate with the centre would not provide a similar effect to having growth occur within a walkable catchment. As I understand it, residential activity and visitor accommodation are both non-complying activities within the centre.
		88	1	Jwl Investment Trust	JWL supports the intent of and need for the Smartgrowth Strategy. It is essential that the Commercial Strategy which forms part of the Smartgrowth Strategy, takes into account and is not inconsistent with, the work which has been recently completed to plan for Tauranga City's growth and intensification. In particular, the Te Papa Spatial Plan. JWL requests that amendments be made to the Draft Strategy. The Centres Strategy (Page 104 and associated maps) needs to be updated to refer to Gate Pa Town Centre in the list of Town Centres. This amendment takes into account the matters raised above and correctly reflect the important Town Centre role and status of Gate Pa under the Te Papa Spatial Plan.
		90	2	Bluehaven Group	6. We are seeking recognition in the SmartGrowth Strategy of Wairakei - The Sands to be defined as a Metropolitan Centre under definitions in the National Planning Standards (NPS).  7. Wairakei - The Sands is the only Centre, currently listed on page 104 of the SmartGrowth Strategy as a Town Centre, that fully meets the definition and scale of a Metropolitan Centre, under the NPS.  it is intended to be predominantly for a broad range of commercial, community, recreational, and residential activities" and is "focal point for sub-regional urban catchments.
		90	3	Bluehaven Group	14. It is understood that's Tauranga City Council is undertaking a review of its Commercial Centres Strategy in 2024. The classification of Wairakei - The Sands in SmartGrowth as per the NPS definitions is important to signal its importance in providing urban development and amenity for the sub-region and to deliver/support key Eastern Corridor outcomes listed on page 136 of SmartGrowth and other improvements in the region.  15. SmartGrowth should signal the role of Wairakei - The Sands before the Tauranga City plan review of its connected centre network.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-07: Housing	1: Sustainability	2	2	Smith-Kerr, Stephanie Heather	I think Tauranga can do a lot more for the environment all the new builds shouldbhave rain water reserve for gardens.
		10	1	Underwood, Ruth	Yes. These things are very integrated - would like to see more new housing built to 'green' and 'accessibility' standards, which would help reduce power usage, maybe generate at least hot water heating if not electricity panels on the roof etc.
	2: District / City Plan matters	17	3	Pirere, Tania	Due to the way maketu is situated I think it would be safe to add more houses especially along and up town point upby aware st that would safer I suppose and only tangata whenua should be able to build there.Not people from other countries.
		39	1	Bennett, Pauline	Inclusionary zoning is a key part of the housing strategy.
		60	5	Tangata whenua collective (CTWF workshop)	• Resource consent processes need to be streamlined. We want to be able to respond quickly to the growing needs of our whanau, especially those who can't afford to rent/buy and to enable those who want to move home.
		80	5	Hickson, Paul	People often object to the loss of valuable farm land, so care has to be taken in sitting settlements. However there are many pockets of land in the East that would be suitable. One suggestion that a WBOP councillor made was that rural owners should be allowed to build an extra dwelling on their lots without resource consent. This should be considered as land owners are the best placed to look at the cow or person argument. An advantage of this approach is that they would provide the infrastructure.
		87	12	Ngai Tukairangi Trust	Resource consent processes need to be streamlined. We want to be able to respond quickly to the growing needs of our whanau, especially those who can't afford to rent/buy and to enable those who want to move home.
		91	28	Sustainable Bop Trust	22. Why isn't inclusionary zoning a key part of the Strategy?
	3: Support	3	2	Wansbrough, Nathan James	Yes
		10	1	Underwood, Ruth	Yes. These things are very integrated.
		22	1	Van De Weyer, Callum	Yes
		72	18	Nga Potiki a Tamapahore Trust	Adopt identification of housing issues identified on Pages 111, 112, 113 as notified.
		72	19	Nga Potiki a Tamapahore Trust	Adopt housing system growth directives as notified.
		72	4	Nga Potiki a Tamapahore Trust	NPaTT agree with and support the challenge that housing demand is outstripping available supply and recognises the current affordability issues around housing. NPaTT also acknowledge that the availability of land supply for housing is an issue. Adopt the challenge as notified.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		75	0	Andrews, Julie	I endorse a "paradigm shift" and "using all the tools available" to ensure future development provides the range of housing options the community needs.
	4: Oppose	19	1	Lee, Jared	NO
		21	2	Wilson-Jenks, Wendy Ann	Please concentrate on council core priorities and leave housing issues to central government!!
		42	21	Gordon, Carole	No I am not confident.The market has failed.We have a housing crisis This region has failed to provision homes for an ageing population - to build affordable choice - to plan for later life lifetime homes and care. The retirement village model is unsustainable and socially divisive. Affordable Elder housing - own or rental in communities that care is a long term necessity. Green field growth is not suitable for older peoples lives. The Strategy does not meet the requirement for Elder homes - insufficient linkage between demographic reality and intensification planning. Give known growth of numbers of older-old people there should be a whole section examining and catering to their health and social care delivery. Why is this connection not being made? We must tackle ageism. It is a human rights issue and must be more adequately addressed. Elders should be engaged in design and planning.
		53	21	Bowden, Beth Willard	At least because it gathers the bleak realities of the Bay of Plenty's housing crisis together in one 17-point list, the Strategy is to be commended. Merely re-stating the challenges, however, is insufficient. The Strategy offers no path towards any real porspect of an increase in public housing supply or tenure law reform that might lead to the stated aspiration of increasing affordable housing.
		54	7	Robson, John	No
		75	5	Andrews, Julie	In terms of "homes for everyone", there is an acknowledgement at page 112 of the Strategy that intensification and some new greenfields will address the housing shortfall, but under the current market dynamics, it is unlikely to address housing affordability. It also notes there are limited examples and products for "alternative tenures", such as build-to-rent, co-housing, or shared ownership. Especially given Kainga Ora's involvement in the sub-region and its purchase of land in the western corridor and along the central corridor, the continuing lack of affordable homes is extremely concerning. I understand that there is no prospect of affordable homes in the western corridor because of the cost of the land and civil works, and that along the central corridor there are geotech issues which prevent the construction of high-rise.
	5: Stronger role for local government	26	1	Nicholson, Scott Weston	"There needs to be a greater emphasis on the role of councils in addressing housing stress and the needs across the region. Councils stand at the forefront of housing transformation. By leading the creation and implementation of local housing strategies, as emphasized in the Government Policy Statement on Housing and Urban Development, they can effectively address community housing needs.
		93	3	Ralph, Christine	VIII. Ensure that each Council has staff skilled in housing development to undertake the facilitation and advocacy roles as defined. This must include continuing with the Housing Action Plan Working Group or equivalent name , provided that it contains at least 50 % membership of people who actually are working in the housing development sector and can facilitate collaboration and advocacy for housing projects.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
	6: Housing action plan	26	0	Nicholson, Scott Weston	Here's what can be done: - Development of Evidence-based Housing Plans: Construct action plans grounded in solid data. - Leverage Resources for Optimal Housing Outcomes: Utilise available resources to bridge the housing gaps, particularly in areas like assisted rental, ownership, and community housing provision. - Collaboration to end homelessness with a housing first approach: The focus should be on championing the needs of those most susceptible to housing stress and homelessness in the region.
		39	2	Bennett, Pauline	Discretionary zoning so that Elders are acknowledged in Social Housing allocations. Currently elders can not get on the MSD social register. Home ownership priority - Tauranga must aim for 80% home ownership. Government rental properties must priorities rent to own. This provides security of tenure, health benefits and property care/maintenance Until home ownership is 80%+, government housing must priorities sustainable provision of Elder housing. All other groups can come within rent to own policies 3 to 8 story single floor apartments priority - provide security of tenure even if privately owned, with priority for Elder Social Houses and rent to own for all other groups. Development within current urban areas. 3 - 8 story single floor apartments within the current urban area (19,000 TCC's RER) will address the current housing shortage without the need for debt inducing road infrastructure development at Tauriko. Affordable homes - are homes that can be purchases by the medium income (\$32,000pa) Social Housing Funding - priority should by CHT (Community Housing Trust) not MSD
		39	3	Bennett, Pauline	3 to 8 story single floor apartments - because lifts are required therefore there is no discrimination against Elders and persons with disabilities. Development within the current Urban areas. 3 to 8 story single floor apartments priority - provide security of tenure even if privately owned, with priority for Elder Social Houses and rent to own for all other groups. Development within current urban areas.
		39	4	Bennett, Pauline	Social Housing Funding - priority should by CHT (Community Housing Trust) not MSD
		39	5	Bennett, Pauline	Government must lead development with Smart Sustainable Plans not developers. Incentives can lead to development in the right way and the right place (within the current urban areas). Stop boundary development, commit 15 - 20 minute communities, commit to public transport. Plan for Elders and Young Maori. Develop communities that are self sustaining. Green spaces - set a space per household
		42	13	Gordon, Carole	A variety of partner Council, housing assessment and SmartGrowth reports place numbers, 'hundreds and thousands,' of houses geographically connected to roads, without a definitive focus on who the houses are for and how their livelihood wellbeing needs may be best served. The need for many more homes for Elders cannot be met by intergenerational wealth capturing village settings. New urban models for Elder living are required. Has planning become a game of shifting house widgets at whim, without sufficiently challenging the efficacy of the growth logic or considering the legislative and ethical imperative for well-being.
		42	16	Gordon, Carole	3.4 Invest in new urban Elder living environment models.
		42	8	Gordon, Carole	Why is the Elder Housing crisis not identified as a priority for collaborating with Government, to do things differently? When will Elder homes needed be located in intensified hyperlocal communities? We have not built suitable lifetime houses for a variety of known reasons. We now face a scenario where evidence shows a 70% growth of people over 75-100+ years with a prospect of increased demand for rental community-based lifetime homes and community-based elder care supply. Where are the strategic processes to ensure solutions to design, innovate and build supply? Are the profits from the City Council Elder Villages sales being honourably utilised to overcome barriers to maximise and revolutionise Elder housing provision in ecosystems that improve wellbeing to reduce costly hospital care? We can learn from global initiatives. Yes please "do things differently". Be transformative and decide how we will do things differently with a focus on discretionary zoning, home and neighbourhood design, with mobility systems that offer far more than current non-accessible, often non-applicable transit routes to 'centres.' Plant more trees, make many parklets, waterfalls and beautiful gardens to make people cool and happy and connected.



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Topic	Issue	Sub ID	Sub Point	Name	Summary
		53	24	Bowden, Beth Willard	Another concern about this section of the Strategy is the absense of 'quick wins'. We need more housing, now. The problems and challenges have been exhaustively examined and endlessly discussed. More devolved solutions, taking advantage ("Connected Centres") of patterns of settlement where clusters of 2-3000 people already live amongst exisiting transport and water reticulation systems, should be being examined now and not relegated to the Future Development Strategy section.
		53	7	Bowden, Beth Willard	Absent inclusionary zoning or even more prescriptive planning controls, how is the impact of competing land use to be managed? Assuming reliance is placed on spatial planning processes (as per the Otumoetai Case Study), how are these embedded into the Council planning process?
		61	1	Child Poverty Action Group	Chapter 7 - Housing in the Smartgrowth Strategy 2023-2073 has summarised some of the challenges in the housing sector but has not identified solutions. It has been well documented over time that housing problems in the WBOP are very serious and have proven very difficult to solve, both for the short term and long term.
		61	3	Child Poverty Action Group	Affordable Rental Housing: WBOP has both expensive rentals and a shortage of suitable rental homes. "The ongoing failure to deliver affordable private rentals makes a strong case to focus new spending on longer term solutions such as social housing, incentives to build new affordable housing, and shared equity rental, rather than short term rent subsidies" : CPAG Greg Waite.
		61	4	Child Poverty Action Group	That said, we must remember that housing for larger families can also form part of intensification strategies. It is not only important for the accommodation of children, but also multi-generational households. Those in poverty should not be marginalised to the sidelines, we must ensure they are integrated with society and are supported responsibly. This creates truly diverse communities.
		61	5	Child Poverty Action Group	Reversely, many elders who are financially viable hesitate to downsize. An assessment of the occupancy within existing housing stock should be interrogated, prior to the approval of further urban sprawl. The UK trialled a 'bedroom tax' to encourage elderly homeowners to downsize or consider alternative uses for their spare rooms. While this wasn't received well by many homeowners, it did force homeowners to consider their options sooner. If backed up with support or buy-out services, a version of the policies mentioned could be used to to help optimise existing housing stock here in Aotearoa New Zealand.
		61	8	Child Poverty Action Group	The housing choices currently available are largely limited to larger expensive family homes that today's families can not afford. Where are the shared ownership homes? Smaller units and shared co-housing options etc do not feature. Restrictive contracts and covenants seem to stipulate minimum sizes too larger than many require and require complex rooflines and shapes and garages and do not allow factory produced homes etc, this all leads to expensive construction that is not affordable for many.
		75	6	Andrews, Julie	I understand there is about \$50M that will come from sale of the Pitau Road Village, and that this could be used for elder housing straight away. The Abbeyfield development in Katikati seems to be an excellent example of how community building can be at the heart of a development and suited to an ageing population who cannot afford home ownership. • I understand that purpose-built long-term rental accommodation is common in Europe and that there is interest in Europe in investing in this kind of accommodation in NZ. • As homelessness increases and options to relocate decrease, we could face the same kind of issues as Queensland, where people are living in public parks because there is nowhere else for them to go. We already have a van which is not being moved on from Memorial Park, presumably for this same reason. Auckland's city mission seems a great initiative. • In regard to an immigrant workforce, I don't know if there are projections about numbers or the sectors in which they will be employed, but I gather there will be a significant number of kiwifruit workers. I have read TPEDG's submission and the fact that there is already demand for worker accommodation in the Eastern Corridor. This will presumably increase with an influx of immigrant workers. I support TPEDG's calls for building homes in the east as a priority. It makes sense to give this growth area priority over Tauriko. It would align with the Strategy (refer page 95, no. 3 - "accommodation for the rural workforce, including seasonal workers, is provided close to jobs and with good access to essential services."). As is pointed out in the TPEDG's submission, not only do communities like Te Puke, Pongakawa, Paengaroa and Maketu already have essential services, they have their own community identity and existing social infrastructure and networks. Homes will cost less than homes in Tauriko, meet the ideal of "Live Work Play", plus they have the advantage of being in close proximity to the Eastern link roading route (which was an extremely expensive piece of roading!). As an aside, an "Eastern city" has been mentioned. This could be a longer term goal.
		76	1	New Zealand Kiwifruit Growers	The SmartGrowth strategy alludes to the importance of securing accommodation for seasonal workers near their job locations and essential services (page 95). However, specifics on how this will be realised are lacking. It is important that the strategy not only recognises the need for housing these workers but also the broader implications for their well-being, productivity, and the overall prosperity of the region.  We appreciate that preserving highly productive land is vital but coupled with the current restrictions on RSEs living in residential homes and the potential community isolation for RSE's due to on-orchard housing, it raises the questions about what solutions and opportunities are available? As the scheme is set to expand, this complex issue necessitates engagement with industry stakeholders, ensuring that the voices of RSE workers are also heard. NZKGI is ready to actively participate in these important discussions.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		77	3	Socialink	<p>(Transformational Direction 1 Homes for Everyone, Chapter 7).</p> <p>We acknowledge the concern and challenges around catering for people's housing needs over the next few decades.</p> <p>One of the Growth Directives states that 'A range of housing types, tenures and price points is provided within all growth areas and Maori land.'</p> <p>Housing will need to include well-designed and affordable accommodation for low income generations, accessible homes for people with disabilities, growth in multi-generational households and more options for single person households.</p> <p>Housing options for older people</p> <p>As noted in the Strategy, the older age group of over 65 years is going to be a considerable proportion of the population. They will be nearly one in three in Tauranga by 2030. However there is limited information in the Strategy on specific ideas taking into account and planning for this impending wave.</p> <p>Many older people with personal options or wealth open to them will sell and buy or make arrangements with family in the available private housing market, irrespective of regional plans.</p> <p>However to accommodate the financial, physical and lifestyle needs of older people who have limited options, we think the Smartgrowth Strategy needs to plan for the following types of housing throughout the western in each of the locations.</p> <ul style="list-style-type: none"><li>• Secure rental based accommodation for single older people living on superannuation only or with very limited savings. This is a significant group who are or will be at risk of homelessness. Abbeyfield is one housing model where a group of residents live independently and share meals prepared by a housekeeper, see <a href="https://www.abbeyfield.co.nz/">https://www.abbeyfield.co.nz/</a> Funding for these complexes is currently raised through grants, fundraising, mortgage and similar. One is already developing in Katikati. As part of the Smartgrowth Strategy there may be ways to support other Abbyfield developments through local structured support eg identifying and securing suitable land, funding and community housing trust partnerships.</li><li>• Other options along similar lines could be fostered and enabled through planning, house modification and other support. These include co-housing with shared common areas, where residents participate in daily tasks, social activity and joint decision-making. Options to have the choice to live with similar age groups or live together with people of different ages could be catered for.</li><li>• Small stand or duplex houses/units with single or two bedrooms for rental or purchase (standalone, duplex, terraced, apartment options) as more older people seek to downsize.</li><li>• Housing/apartment complexes can be built to accommodate a diverse demographic groups as well as including gardens and local businesses within them.</li><li>• Support for turning houses into 'flating arrangements' for older people such as doing modifications.</li><li>• Multi-generational options for extended families</li><li>• Retirement villages provided by private developers or community trust partnerships</li><li>• 'Rest home' facilities to provide care and support for people who are unable to remain living by themselves.</li><li>• Aged care and dementia care facilities - there will be an increasing need for these.</li><li>• Papakainga housing for kaumatua (including multi-generational housing).</li></ul> <p>We expect the Connected Centres will have a range of housing options and social infrastructure.</p> <p>What is good well-designed housing for older people that meets environmental, access and social cohesion goals are also likely be good housing options for other groups, particularly for those with limited financial resources. Some of what is built for older people will be repurposed as the 'baby boom' generation tails away.</p>
		91	26	Sustainable Bop Trust	<p>18. Will it provide sufficient appropriate housing for our elderly and disabled residents?</p> <p>19. If not, why not? (This seems one area with strong societal consensus: taking care of our elders and our most vulnerable.)</p>
		91	27	Sustainable Bop Trust	<p>20. How will this Strategy realistically result in affordable housing?</p> <p>21. How much affordable housing is anticipated and how is "affordable" defined?</p>
		93	2	Ralph, Christine	<p>I. Provide fiscal support through shared equity schemes and joint venture affordable housing developments and /or exemplar projects.</p> <p>II. Facilitate home ownership deposit schemes provided by the housing market, trusts or other mechanisms that provide for the in-perpetuity retention of rental and ownership homes in an affordable housing pool.</p> <p>III. Provide regulatory support through RMA Plans for development incentives for permanent affordable housing throughout the community.</p> <p>IV. Facilitation with MHUD on financial schemes ( such as the Land for Housing Program, Progressive Home Ownership Fund through an approved provider, First Home Starter grants and reduced deposits).</p> <p>V. Co-ordinated advocacy with other local authorities to central government on legal mechanisms for inclusionary zoning and betterment taxation for affordable housing and other legal initiatives.</p> <p>VI. Co-ordinated advocacy with other local authorities to the banking industry for less constrained lending for housing developments ( e.g. profit rate requirements ) and more acceptance of housing equity schemes and rent to buy schemes and other such solutions that will comes over time.</p> <p>VII. Co-ordinated advocacy with other local authorities to central government on the cost and supply streams for building products and a skilled construction workforce.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		93	4	Ralph, Christine	2. In the Part 4 ,to provide a breakdown of the target housing supply by location that has to be met for rental and ownership by household size ( traditionally the number of bedrooms ) and price point. I attach for your information a copy of housing assessment criteria that HAF provided to UFTI in February 2020 which gives you some idea of the breakdown required and anticipated.
		93	5	Ralph, Christine	3. To make it clear in the Strategy document that the adopted Housing Action Plan actions have been absorbed into the Housing Systems Plan.
		93	6	Ralph, Christine	4. Create a forum for monitoring the Housing Systems Plan similar to the Transport Systems Plan Partner Management Group and an associated Governance Group. There must be regular monitoring and accountability of the Council's actions in facilitating a range of housing types, tenures and price points within all growth areas and Maori land. Housing is as crucial as transportation to the sustainable development of our region so treat it with the same vigour.
	7: Social Community Housing	26	0	Nicholson, Scott Weston	Mobilisation of Central Government Support: The central government plays a crucial role in addressing homelessness with their offerings like emergency housing, transitional arrangements, and social housing. Priority should be given to collaborating with local entities, including councils and iwi, and adopting a community-centric approach to significantly alleviate housing challenges. The Affordable Housing Fund and the Housing Infrastructure Fund exist to bolster affordable housing and facilitate infrastructure development.
		61	2	Child Poverty Action Group	Social Housing: CPAG has suggested that nationally we need to increase the number of State Owned Units from 3.2% to 4% by 2030 and 5% by 2040. The Strategy describes the current Social Housing base in WBOP as less than 2% and blames challenging economics in WBOP as the reason. Clearly this is not good enough. We need an urgent debate to find ways to fix this.
		91	26	Sustainable Bop Trust	18. Will it provide sufficient appropriate housing for our elderly and disabled residents? 19. If not, why not? (This seems one area with strong societal consensus: taking care of our elders and our most vulnerable.)
		93	1	Ralph, Christine	This Submission seeks: 1. Within the Housing Directives Part 3 and Implementation Part 4 action statements including the following ( or similar): Social/ Community Housing I. Support and collaborate with central government through project grant schemes , state housing provision ,fiscal support for Community Housing projects, partnering in exemplar affordable housing projects. II. Continue to support the homeless sector initiatives . III. Continued subsidisation of development/financial contributions.
	8: Maori housing	60	1	Tangata whenua collective (CTWF workshop)	<ul style="list-style-type: none"> <li>• How can we manage growth and provide houses for others, when we can't currently and adequately provide homes for our own? Where's the manaakitanga and kotahitanga?</li> <li>• Maori are already overrepresented in the worst statistics relating to employment, income, housing and homelessness.</li> <li>• Increasing the supply of housing/rentals is good but needs to cater for the range of needs, especially lower income.</li> <li>• The SmartGrowth Strategy needs to ensure that Maori are not left further behind.</li> <li>• We need to ensure that manuhiri are not prioritised over mana whenua.</li> <li>• We need affordable rentals and homes in urban areas as well as the ability to build on our whenua.</li> <li>• Our current population requires priority over future population.</li> </ul>
		60	6	Tangata whenua collective (CTWF workshop)	<ul style="list-style-type: none"> <li>• In relation to Maori land development: <ul style="list-style-type: none"> <li>o Infrastructure is just as huge a cost as paying for a house.</li> <li>o Hopefully someone can fight for us and win a "no rates to pay on Maori Land and "slice down the water rates cost for Maori land dwellers.</li> </ul> </li> <li>Have a Maori bank for whanau wanting or needing to build a comfortable home on their land with reasonable price infrastructure .</li> </ul>
		72	2	Nga Potiki a Tamapahore Trust	NPATT notes the following: <ul style="list-style-type: none"> <li>• The focus of the cultural well-being on papakainga development on Maori land only is myopic and does not address other important issues.</li> </ul>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		72	5	Nga Potiki a Tamapahore Trust	NPaTT agree with and support the challenge of enabling Tangata Whenua to realise values and aspiration for their whenua and state further: • Development of Maori land is also hampered by zoning rules and other regulations that do not reflect the needs or aspirations of Maori. Adopt the challenge as notified.
		86	2	Ngai Tukairangi Hapu Trust	01. Areas to be protected and developed carefully 1A. Maori communities Development of Maori land blocks have too many barriers such as lack of infrastructure, funding, and ability to develop land. For example, access to power, water, roading etc. 1A(1). Needs improvement OR support. Provide opportunities for Maori communities to be able to develop land in a way that suits the needs of tangata whenua.  1A(1). Needs improvement OR support. Provide opportunities for Maori communities to be able to develop land in a way that suits the needs of tangata whenua.
		87	8	Ngai Tukairangi Trust	How can we manage growth and provide for houses for others, when we can't currently and adequately provide homes for our own? - Increasing the supply of housing/rentals is good but it needs to cater for the range of needs, especially lower income households. - The SmartGrowth Startegy needs to ensure that Maori are not left further behind. - We need to ensure that manuhiri are not prioritised over mana whenua. - We need affordable rentals and homes in urban areas as well as the ability to build on our whenua.
	9: Intensification	3	0	Wansbrough, Nathan James	There should be incentives for building higher density housing in the main centres. More residents in the city centre would lead to more people using alternative forms of transport. "
		10	2	Underwood, Ruth	For denser 'brown fields' development, the challenge is not unduly infringing on existing neighbours so need attention to height, daylighting etc
		19	4	Lee, Jared	Housing - stop going out and start going up.
		42	12	Gordon, Carole	This fact is a glaring aspect of our national history reflected in Flaxmere, Porirua and Mangere. The serious nature of this negative outcome position (p137) particularly on future and ageing generations, is such that we should seriously consider limiting the scope of greenfield land development and give immediate priority focus to planned quality intensification of Te Papa and other brownfield existing areas. A query currently posed by the World Economic Forum is relevant.  "Underpinning prosperity with economic growth has been a recurrent feature of the modern world, but the complexities of global issues are beginning to challenge these long-held assumptions. What does economic growth really mean in the current context and what kind of growth should we be striving for?"
		42	14	Gordon, Carole	3.1 Pause green field development and give priority focus to 'age- ready' age-friendly intensification of Te Papa and areas currently planned for intensification.
		50	1	Lucas, David Thomas	There is nothing smart about putting intensive housing in the Bay. For a population density in New Zealand it is 20 per square kilometre. England is 434. Why are we insisting on putting people closer and closer together causing more stress. Don't we have enough mental health issues already. Labours Phil Twyford, started the ball rolling when he convinced, or told the Bay councils to go up and intensify. One only has to look at what's happened in Auckland as an ex ample. With all the infilling of ugly 3 story or more boxes, just SHOCKING. Surely we have enough land available here in NZ to not have to do this. There does seem to be a lot of emphasis on producing homes for Maoris. As I believe we supposedly live in a multi cultural society, aren't all the many races who live here as deserving of a home to live in. Not sure whether you realize we have a new government. One of their policies will be to look at peoples needs, not based on their ethnicity when it comes to housing, health or such like. Makes sense to me!.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		53	23	Bowden, Beth Willard	There is also an important community discussion still to be had about the nature of intensification itself and the range of housing typologies needed for our 15-minute neighbourhoods. I support the priority given to the issue, but there are few apparent pathways to resolving it. I note in passing that, as the fifth biggest city in New Zealand, located on the fourth smallest land area, some form of intensification seems already to have taken place. It is also unclear whether the proposed TCC Plan Change 33 has been assumed as part of the Strategy or, if not, what its impact would be if it were to go through.
		74	4	Waste Management Nz Ltd	housing directives including direction to support and realise tangata whenua aspirations for Maori land and papakainga development in urban areas, as well as increase the public housing supply to proactively support the delivery of social and affordable housing in existing urban areas. Waste Management's submission in this regard is focused on ensuring intensified residential and other sensitive activities are developed in appropriate areas, in order to promote community health and wellbeing and mitigate reverse sensitivity effects (where relevant) on nearby existing industrial activities in close proximity to areas proposed for intensification.
		75	7	Andrews, Julie	I am in favour of intensification over sprawl because of carbon reduction and environmental factors.
		91	14	Sustainable Bop Trust	Will intensification mostly be 2-3 story townhouses, or 4-6-8 story apartments? The dots on the map seem to indicate 4-8 stories, but is that realistic?

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Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-09: Three waters and other infrastructure	1: 3 waters reform	12	2	N/A, Haley	Do not agree AT ALL to this treasenous 3 water idea!
		19	6	Lee, Jared	Three Waters etc - Waste of money and time and undemocratic
		50	3	Lucas, David Thomas	Totally against 3 waters, or 10 waters, or affordable water, whatever, take your pick. Before we waste any more taxpayers money on this, it should go back to the councils for discussion with the community. We the rate payers have payed for it, and should be listened too but it seems that we don't count. As one of the rate payers who pay a extra ordinary amount each year, we should have the option to, HAVE A SAY and to be listened too. but it seems, in my experience, that even when we have overwhelming support against some policies such as the 3 waters or Maori wards, they are still passed. Both un democratic, shame on you. As our esteem Mayor said so arrogantly. This is about making the right decision not the popular one. I rest my case.
	2: Oppose	6	5	N/A, Linda	NO
		19	3	Lee, Jared	No
		37	2	Lois	No
		54	9	Robson, John	No
	3: Water supply analysis	53	17	Bowden, Beth Willard	I am personally dismayed that the reforms proposed by the previous government foundered so comprehensively. As a resident of Western Bay, I feel fortunately situated and confident in a high-quality, relatively low-cost reticulated water supply system. But I am conscious of Tauranga City's dependence on Western Bay's water and feel we have lost years of valuable planning time. • What investigations or analysis have been done to establish whether there is, in fact, enough water for 400,000 people?
		75	14	Andrews, Julie	Another consideration is the extent to which we are limited by resources. My understanding is that the water supply will put a cap on growth. (I see water availability is noted as a factor to be taken into account on page 28 but there is no analysis of what this might mean in specific terms.)
		76	6	New Zealand Kiwifruit Growers	Many kiwifruit growers in the sub-region currently rely on an adequate supply of water for irrigation and frost protection. The demand for water is likely to increase with climate change. NZKGI has recently provided comments on Bay of Plenty Regional Council's Freshwater Management Unit (FMU) stories. The proposed minimum flows in rivers and streams will create new challenges in terms of reliability of water supply when river levels fall during dry weather. Water storage and water efficiency measures will become more important for everyone to achieve climate change resilience. Some growers have already switched from taking surface water to taking groundwater to ensure a more reliable supply and others are likely to follow.
		76	7	New Zealand Kiwifruit Growers	The infrastructure needed to support development in the sub-region, including the need for new bores to cater for expected growth is discussed in Appendix 1 of the Smartgrowth Strategy. It is unclear whether the surface water and groundwater allocation maps produced by BOPRC currently provide for these new water takes. In addition, it is unclear whether the long-term water needs associated with new future areas of housing and industrial land are included in the allocation maps.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		86	12	Ngai Tukairangi Hapu Trust	<p>9B. Water systems and infrastructure:</p> <p>The thoughtful consideration given to power grid infrastructure is equally applicable to our water systems and existing water infrastructures within Matapihi. It is our understanding that Whareroa is able to access town water supply.9E(1). The pressing question emerges: are the current water infrastructures robust enough to accommodate the envisioned growth associated with future papa kainga developments for our whanau?</p> <p>Alternatively, is it imperative for the SGS to support Matapihi in enhanced and more advanced water infrastructures to effectively cater to this anticipated expansion? This would entail the implementation of improved water treatment and distribution technologies, expanding the capacity of existing systems, and adopting sustainable water management practices. Moreover, integrating innovative solutions such as rainwater harvesting, greywater recycling, and efficient irrigation systems can contribute significantly to water conservation and sustainable usage within the community. These practices align with our commitment to kaitiakitanga and the preservation of our wai maori.</p>
		91	4	Sustainable Bop Trust	<p>We note that TCC's Plan Change 33 information showed its 25% and 50% intensification scenarios result in increased water infrastructure capital expenditure compared to the baseline of mostly new greenfield provision. That seems to go against the findings of other NZ cities (and international experience) that indicates higher-density intensification is cheaper overall.</p> <p>This is a key issue. The overall long-term cost of intensification v greenfield developments needs to be fully understood by councils and by local communities, in order to make informed, sustainable decisions.</p>
		91	20	Sustainable Bop Trust	10. Why is the adequacy or otherwise of potential future water supply not addressed in this Strategy, before committing to decades of further high population growth?
	4: Electricity generation and supply	71	2	Zespri International Limited	<p>4.2 Significant investment is required to our region's infrastructure and we need more electricity generation transmission to meet demand growth, particularly as industries look to transition away from fossil fuels and towards electrification, creating a greater dependence on the national electricity supply. The national electricity grid will not meet the estimated 68 percent increase in electricity demand out to 20502. Business NZ called for investment in energy infrastructure to achieve decarbonisation goals.</p> <p>4.3 According to a 2023 Transpower report, achieving "accelerated electrification" by 2035 will require 40 new grid connected generation projects, 30 connections to accommodate increased electricity demand, 10-15 new transmission interconnections and other network investments4.</p> <p>4.4 Transpower highlighted Bay of Plenty is at risk of circuit overload from winter 2027. Generation capacity in the Bay of Plenty region is low compared to demand, with almost all our energy supply imported over the Kaimai ranges. It has identified that even if the Kaimai transmission to Tauranga was used at full capacity, this would exceed the ability of the lines to deliver it around the region.</p> <p>4.5 Infrastructure investment underpins business confidence to invest - our postharvest suppliers need to know the electricity infrastructure and supply is available before they can decide to invest in new and expensive electric technologies to run the packing lines and coolstores our supply chain requires. Considering the industry has the goal of doubling volume of the next 10 years, more energy generation and transmission will be needed to deliver that.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		86	11	Ngai Tukairangi Hapu Trust	9A. Power grid infrastructure: Ngai Tukairangi firmly supports our whanau in establishing papa kainga within our respective communities at Whareroa marae and also Hungahungatoroa marae, and within the respective wider Matapihi land-blocks, recognising the cultural and familial significance of these developments. To enable our whanau to realise their vision of papa kainga on their whenua, it is essential to ensure that the appropriate infrastructure is in place to support these developments effectively. Power grids stand out as a critical infrastructure required for housing developments, including papa kainga. The pertinent question that arises is whether the current power grid system in our rohe has the capacity to accommodate future papa kainga developments for our whanau. Alternatively, will our whanau require additional 9A(1). The SGS can facilitate the implementation of necessary enhancements. This might involve expanding the grid's capacity, integrating renewable energy sources, or adopting innovative smart grid technologies to ensure both efficiency and sustainability.infrastructural support in the form of an upgraded power grid to cater to the anticipated growth?
		89	3	Transpower New Zealand Limited	3.13(2)(c) any constraints on development
	5: Support	70	4	Element Imf Ltd	Element IMF also support the inclusion of the water and wastewater Critical Enabling Infrastructure requirements identified for the Western Corridor in the FDS (Table 1, page 152), including: • Tauriko West Enabling Works - Wastewater and Water Supply • Western Corridor Wastewater Strategy Implementation - Stages 1&2 - Tauriko West/Lower Belk/Keenan Road; Stages 3&4 - Upper Belk/Merrick Road • Western Corridor Water Supply Strategy Implementation - Stages 1&2 - Tauriko West/Lower Belk/Keenan Road; Stages 3&4 - Upper Belk/Merrick Road Notwithstanding the above comments regarding the timing of the Tauriko Network Connections (Stage 4) - SH29 and 29A improvements, all of the "Road Network", "Wastewater" and "Water Supply" infrastructure improvements for the Western Corridor outlined in Appendix A of the Strategy (page 173) are otherwise supported.



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Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-08: Transport	1: Oppose	6	2	N/A, Linda	NO
		8	2	Goodall, Andrew David	no
		11	1	Clarke, Simeon	Too much emphasis on cycleways and not enough on expanding capacity for private vehicles (electric or not) which is what improves our quality of life.
		12	1	N/A, Haley	Focus more on infrastructure & roading solutions!
		15	2	Kenyon-Slade, M	Our population is simply far too small and spread out by waterways for public bus and transportation to be used to any great deal. A million population number is a minimum threshold worldwide. It is for Priority One to convey and reinforce this simple message to these airy fairy Labour led Government planners. In my and many business people and logical thinking publics opinion.
		19	2	Lee, Jared	No
		19	5	Lee, Jared	Transport - if you stop going out and start going up you will lower your carbon footprint and reduce day to day C02 output
		30	1	Wallen, Bruce	The concept of all road transport going through a single area (or hub ) in the city centre then spoking back out to individual isolated centres is flawed as it will only take one road to be blocked or broken (as from earthquake, flood, or road accident ) and the netwrok will be overloaded. Suggest include, 1. second level radial routes )regional roads) linking the outlying centres so there is always an alternative access. 2. include commuter train network linking all centres as priority in all planning for transport, even to detriment of road width and capacity. 3. Preplan and invest in securing land for rail corridors and and new roads now rather than wait until required, that will drive population spread and density as once corridors are defined on maps and plans people and business will look further ahead.
		39	9	Bennett, Pauline	The highway as the rapid transport passage - because Tauranga is a port city therefore priority should be for Port transport. Government and Port funded not rate payer debt burden funded. Cameron road should not be the rapid transport passage.
		45	1	Liddell, Alan Alexander	No

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		45	2	Liddell, Alan Alexander	<p>Yes. Why do you not provide a fast, frequent, reliable, safe, rainproof, easy-to-pay-for and consistent public transport service BEFORE(!) you accelerate your policy of making things more difficult for cars and thereby destroying CBD businesses? We can't afford rail, either underground or overground, so get rid of the big empty busses except at peak periods and use electric minibuses, possibly hybrids. At peak periods, use the big busses towards the inner city and move the minis to the suburbs and use them as morning feeders or afternoon takers for the big busses.</p> <p>Stop blocking Cameron Road and its adjoining streets. Reduce the width of cycle lanes or remove them altogether. There is far too much space provided for a very few bikes and scooters. Provide good parking buildings instead of reducing parking spaces.</p> <p>Incentivise use of new mini buses by using congestion charges in the CBD excluding roads that by-pass the CBD like Takutimu Drive.</p> <p>All this should be obvious. I used to come into town from Bethlehem for lunch or breakfast regularly. Now I never do. I used to eat at downtown restaurants. Even though parking at night is easy, I am more likely now to go a restaurant at the Mount or here in Bethlehem as the Council is killing the central city and it is becoming less safe. I only now come to the CBD to attend my gym in 1st Avenue and, because I am already there, to shop at PaknSave and clear my PO box in 6th Av. Were it not for the gym (which I attend for the trainer there, not because of the location), I would switch my PO box address to Bethlehem, attend Aspire gym at Bethlehem and shop at PaknSave at the Lakes. The parking is better at the Lakes, anyway. I do not want to speak to this as I think I would be wasting my time but you asked for transport feedback and I have the time to type a rant.</p>
		53	8	Bowden, Beth Willard	<p>This chapter of the Strategy offers only an inferential connection with housing (and settlement patterns in general). This should be remedied - the two are closely integrated.</p> <p>I choose to read the four key challenges as being of equal, not sequential, importance but I note that the Climate Resilience chapter (at p.68) makes it clear that transportation is the major factor if serious GHG emissions reduction is intended.</p>
		54	8	Robson, John	No
		70	2	Element Imf Ltd	<p>To enable the development of TBE Stage 4 (in the short term) and the Upper Belk Road growth area (in the longer term), provision of infrastructure servicing and transportation linkages is critical. In our view the Strategy appropriately identifies the challenges and growth directives surrounding three waters and other infrastructure (within Chapter 09). However, for the growth directives for transport there should be emphasis placed on providing for freight movements to and from the sub-region's key industrial nodes, such as TBE, and not just the Port of Tauranga. As such the following additional wording is proposed for transport growth directive number 7 (within Chapter 08):</p> <p>7. An efficient freight network is enabled to support movement to the Port of Tauranga and key industrial nodes, and contribute to local and wider economic wellbeing.</p>
		75	11	Andrews, Julie	<p>I am in support of the aspirations of the Strategy, particularly those I have listed below* - my comments are in italics. However, I'm not at all clear about the public transport plan and how the aspirations will translate into reality. UFTI/Connected Centres does do not seem to fit with the Strategy's aspirations.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		75	16	Andrews, Julie	At the moment, the premise is that creating a "spine" along Cameron Road from the Western Corridor is the most effective way of transporting people to where they need to go, that it will increase the use of public transport and reduce carbon emissions. According to the Strategy, 70% of jobs may be along that corridor. However, getting along the corridor will be impeded by 28 sets of traffic lights so would commuters not just take Takitimu Drive instead? And of course work is not the only reason people travel around town or to the Mount or outer suburbs. We have a good indication from Waka Kotahi data (using the commuter.waka.app) about the extent to which people move across and around the city, for example to: <ul style="list-style-type: none"> <li>• medical appointments. The hospital in particular shows up as a major destination. I see that there is a bus stop planned for there but more thinking may be required about routes and also options for the mobility impaired. There are a number of other medical facilities that</li> </ul> also have a high visitation rate (eg Tauranga Eyecare). As noted on page 129, healthcare is an important component of meeting people's needs across all corridors in the sub-region; <ul style="list-style-type: none"> <li>• the airport;</li> <li>• sports facilities (which ironically have become more centralised over recent years rather than community-based although I see on page 164 there is a goal to "increase the capacity of existing sports fields and major neighbourhood play spaces throughout Tauranga City").</li> </ul> Often there is no feasible way of getting to these destinations by public transport. Even if it's possible to change buses and get to a destination, realistically, people are not going to do that, especially if they can get there more conveniently by car (which forms the basis for the second aspiration below).
		91	21	Sustainable Bop Trust	11. Why is there nothing in this Strategy to show what the TSP Public Transport Plan looks like at a practical level and how it will be implemented?
	2: Support	3	3	Wansbrough, Nathan James	Yes
		10	4	Underwood, Ruth	Yes.
		18	1	Ingram, Christopher	Here's an extra concept to manage Mount parking problems, traffic, free up Mount business district
		22	2	Van De Weyer, Callum	Yes
		33	3	Sanderson, Nathan John	Potential bulk transport options: Sea Ferry - unreliable with weather and tides Buses - increase infrastructure to create fast bus links? Short term... Train - All have current rail access. Will need to be upgraded to be dual lane as must be a fast service to encourage users. Developers bid for Train stations and can develop around them.... Long term... Select and commit now, invest heavily to create the future we need.
		55	10	Holyoake, Peter	I believe the elements of the needed transport plan are contained in the Strategy document, however the need for improved infrastructure is evident now and I would strongly advocate that the infrastructure improvements receives the higher priority:

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		55	6	Holyoake, Peter	In general, yes. The present areas of congestion and the need for improved infrastructure are both recognised in the Strategy document. The need for enhanced infrastructure is now, preferably before new development areas.
		59	12	Ministry Of Education	The Ministry is supportive of the approach outlined in the transport chapter which would support access to local social and economic opportunities within a 15-minute walk or bike ride, and sub-regional social and economic opportunities within 30-45 minutes. A programme to create high frequency public transport routes and an integrated and connected strategic walking and cycling network is supported. It will be important to ensure that provision is made for public transport, walking and cycling early in the development of greenfield growth areas in order to ensure that new residents are able to access these transport modes.  Relief sought: - Retain as notified.
		71	3	Zespri International Limited	Roads
		86	8	Ngai Tukairangi Hapu Trust	8A. Promoting sustainable transportation: Ngai Tukairangi hapu stands firmly behind the SGS's initiative to curb private vehicle reliance by promoting alternative transportation methods. Recognising that Tauranga boasts the highest private vehicle usage rates in the country, coupled with the lowest public transport adoption, underscores the urgency of this endeavour. We are acutely aware of the detrimental impact vehicles have on air quality and carbon emissions. We wholeheartedly commend the SGS's proactive measures in navigating this challenge, all for the greater good of our environment.
	3: Multimodal	3	0	Wansbrough, Nathan James	Acknowledgement and thanks was given to the SmartGrowth Plan itself, including the change of focus to public transport, walking, and cycling. The work currently being undertaken on Cameron Road to provide for multimodal means of transport, including the consideration of having bus stops that do not affect the traffic flow. As the SmartGrowth Strategy was looking at the next 50 years, Mr Wansbrough felt it was important to consider additional rail, dedicated bus infrastructure (tunnels and bridges).
		10	5	Underwood, Ruth	Need a lot to happen here to make it easier to use public transport. Short term all road projects need to include walking, cycling, bus-lane, 'park and ride' features. There are good things happening, but it is a real catch-up. I'm keen on a 'buses on the train track' dual rail/wheels system like the repair trucks that drive on the railway now. That would work for transport from Te Puke and Omokoroa over the longer term. What about a (free?) 'park and ride' from Baywave to Tauranga - frequent buses using the 2 bus lanes already in place, security-focussed parking ... get Bayfair to sponsor it? Park and ride somewhere around Totara Street for the beach visits over January or for those driving into the area to accommodation with inadequate parking and clogging up the Mount beach front, Pilot Bay and on-street parking, with 15 minute drop-off zones for people to unpack ... Some of thee things could be trialed quite simply. Congestion charging is tricky - congestion is its' own 'punishment' - so does influence travel and transport already.
		16	1	Firth, Heather Doreen	Instead of parking and public transport problems at the Mount, we could have electric tuktuks on a circuit, so that people could park far away and easily ride to the shops and amenities

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		18	2	Ingram, Christopher	Re Park and Ride concept. a) free /low cost parking adjacent BayPark/Mercury stadium.location b)e Buses circling Baypark - Mount Downtown -Baypark every 20 minutes at low/no cost More frequently or limited only to summer time... and weekends. Or parking building for300 cars built as commercial undertaking on Council land.
		27	2	N/A, Richard	Building roads will move congestion from one place to another. For every person that is able to catch a bus or use a bike, there is more room for those who can't and for delivery vehicles. Planning needs to include all modes of transport and park and ride. Park your bike and ride. All those things that stop people from using alternative transport need to be addressed. Move away from a car centric way of thinking. The electric car is not the answer, instead we need to get people out into their community sharing their commute and getting to know each other. What about passenger rail? Especially as an inter regional mode of transport.
		30	3	Wallen, Bruce	Be bold in procuring sites for future infrastructure now and ignore the startup implications of cost and complaint. Learn from history. Auckland wanted commuter trains in 1960 championed by Slr Dove Myer Robinson, but procrastination and prevarication means they still dont have an effective let alone efficient transport system. And cars (and possibly petrol tax) prevail...
		35	2	Low, Jason	A commuter train from the CBD to the mount to tepuke
		38	2	Smith, Michael Geoffrey	I am concerned no real planning on passenger rail as a solution to clean, efficient and viable transport in the region and outside the region Hamilton - Auckland. The rail network is already in place - we should be using it. I understand to fully upgrade to the required level for all North Island is around \$3b so BOP being the fastest growing region, etc. Passenger Rail should be high Priority One priority.
		39	11	Bennett, Pauline	Consideration should be given to making Cameron Road and Frazer Street one way streets. Electric Commuter Trains/trams Government funded - for fast efficient inter community connections. Taking cars and buses off the roads
		39	12	Bennett, Pauline	Bus Hubs - Full service Bus Hubs at all major community connections You can not propose intergenerational debt with an ageing population
		39	6	Bennett, Pauline	Transport: Electric Commuter Trains/trams Government funded - for fast efficient inter community connections. Taking cars and buses off the roads. Government must lead development with Smart Sustainable Plans not developers. Incentives can lead to development in the right way and the right place (within the current urban areas). Bus Hubs - Full service Bus Hubs at all major community connections You can not propose intergenerational debt with an ageing population

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		40	4	Buhrs, Nicole	<p>Transport:</p> <p>This goes together with housing. To reduce the number of cars on the road I don't think that a price tax will be the solution. It will again put an extra burden on already struggling families. Public transport needs to be put into place before starting intensifying areas and developing new ones.</p> <p>What about encouraging people to carpool when they go to the same place/event at the same time? What about having a separate lane for cars that carry more than one person (T2 or T3 like in Auckland)? What about creating a network of connected cycle lanes physically separated from roads? What about a frequent and reliable bus system (like every 10 min) during rush hour? What about a minivan public transport door to door service outside rush hour - like they are trialling in Tawa and Timaru? What about free buses for school children going to school? What about express commuter buses? What about using the rail in suburbs where the train goes through (like Omokoroa to Te Puke for example). What about making use of ferries?</p>
		41	4	Mollison, Margaret Helen	<p>Public transportation, as one of the key ways of reducing carbon output in our city, needs to be planned and executed now before full intensification takes place. This needs to include walkways, bikeways, dedicated bus lanes, possibly ferry services, trains and trams - or at least the future possibility of these - with an integrated and safe framework so that people can move easily without the need for cars. Cities such as Melbourne and Sydney which set out their public transport systems 150 years ago show us that good planning has become a vital part of a functioning modern city, which helps improve sustainability and quality of life for all.</p>
		45	3	Liddell, Alan Alexander	<p>Yes. Why do you not provide a fast, frequent, reliable, safe, rainproof, easy-to-pay-for and consistent public transport service BEFORE(!) you accelerate your policy of making things more difficult for cars and thereby destroying CBD businesses? We can't afford rail, either underground or overground, so get rid of the big empty busses except at peak periods and use electric minibuses, possibly hybrids. At peak periods, use the big busses towards the inner city and move the minis to the suburbs and use them as morning feeders or afternoon takers for the big busses.</p> <p>Stop blocking Cameron Road and its adjoining streets. Reduce the width of cycle lanes or remove them altogether. There is far too much space provided for a very few bikes and scooters. Provide good parking buildings instead of reducing parking spaces.</p> <p>Incentivise use of new mini buses by using congestion charges in the CBD excluding roads that by-pass the CBD like Takutimu Drive.</p> <p>All this should be obvious.</p>
		47	6	Fitter, Julian Richmond	<p>You talk about sustainability and effectiveness, and yet there is nothing in the plan that suggests you have any idea how to solve the transport issue in the region. If the population of the region is set to double and most of that growth is outside the Tauranga urban area, then quite clearly you need to build in an effective and efficient transport system.</p> <p>That does not mean more cars as there is already no room for them. That must mean developing an effective public transport system:</p> <ol style="list-style-type: none"><li>1. Develop a really effective local bus network in and around Tauranga City - using mini-buses and hubs.</li><li>2. Develop Park and Ride services at all entry points to Tauranga</li><li>3. Develop a passenger rail network to take the strain of the roads</li><li>4. Look at other transport options such as light rail up Cameron Road.</li><li>5. Consider overhead Gondolas as an option</li></ol>
		53	11	Bowden, Beth Willard	<p>How is it that implications for rapid transit afforded by the TEL and TNL, supplemented by local shuttles and park-and-ride options along rural highways, are not incorporated in the Strategy?</p>
		53	9	Bowden, Beth Willard	<p>I regret the emphasis on roading and wheeled vehicles and the absence of any consideration of rail and water-based transportation options. That said: Are private vehicles to be the only means of connection between our Connected Centres?</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		55	8	Holyoake, Peter	<p>2. Alternatives to private transport:</p> <p>CONCERN: Tauranga road congestion is already causing delays and this impact will increase due to increasing traffic density. This causes increasing loss of productive work hours and increasing road pollution:</p> <p>RECOMMENDATIONS:</p> <p>a). Construct a Bus station - perhaps at the Crossing.</p> <p>b). To relieve congestion and vehicle exhaust pollution please consider augmenting the number of bus routes to serve Greerton, Tauriko Industrial Area, CBD and the suburbs of Pyes Pa, The Lakes, larger Tauriko and the new KRUGA - perhaps locating a bus terminus at Tauranga Crossing (as above). Consider the inclusion of bus stopping bays in the existing and new roads.</p> <p>c). Implement a park and ride scheme to minimise the private vehicle congestion and pollution into the CBD. Parking for commuter vehicles could be provided, possibly at Tauranga Crossing, with frequent rush hour bus services into (and out of) the CBD - along a major business access route like Cameron Road / Maleme Street. The Crossing and the Tauriko Industrial area are well located to act as a public transport hub for the Tauranga Western Corridor developments.</p>
		75	10	Andrews, Julie	<p>There are questions around what is not addressed in the Strategy. When I was involved in a survey about UFTI a few years ago, most people we asked about transport networks said they favoured rail. Although this has been considered too expensive in the past, with the growing population of sub-region and the rapid development of technology and AI, there may be ideas that are worth investigating (certainly this is the approach that Wayne Brown is taking). I would have thought we should be at least be planning for an interconnected rapid transit system which would entail identifying and securing land for that purpose before the land gets sold/built out. To give an example, I understand that a rail service from Omokoroa could have been a good option but the land which would have been suitable for a railway station in Omokoroa has recently been sold. Park n Rides are to form part of the network but I can only see them mentioned in the Strategy at Domain Road, Wairakei, Omokoroa and Te Puna. We need to provide for others which are closer in, eg at Baypark. Similarly, there could be more on-demand PT trials, including Maungatapu (where I live!) which is ideally suited to the concept because of the long peninsula. I am in support of the aspirations of the Strategy, particularly those I have listed below* - my comments are in italics. However, I'm not at all clear about the public transport plan and how the aspirations will translate into reality. UFTI/Connected Centres does do not seem to fit with the Strategy's aspirations.</p>
		75	12	Andrews, Julie	<p>Aspirations from Startgey:</p> <ul style="list-style-type: none"><li>• Provide frequent and reliable public transport and safe, connected cycle facilities within and between centres, supporting intensification areas and higher densities. (page 19)</li><li>• Focus on delivering frequent and reliable services on core corridors in tandem with targeted interventions to make public transport journeys competitive with travel by private vehicle.(page 116) I think this is key!</li><li>• Future proof the public transport system for a longer-term transition from frequent and reliable services to rapid transit. (page 116)</li></ul> <p>Does this include identifying corridors and purchasing land? Where is the rapid transit plan?</p> <ul style="list-style-type: none"><li>• Implement recommendations from the Bus Decarbonisation Feasibility Study in terms of transitioning the fleet to zero emission buses. (page 116)</li><li>• Explore the potential for new modes and service delivery models including on demand public transport, passenger rail and ferries, park and ride. (page 116) Are you gathering data on what people would actually use and in what circumstances? Having an effective process for this is critical, and we cannot keep delaying action on these critical components.</li><li>• An on-demand public transport trial on page 167 (Greerton, Tauriko, Pyes Pa)</li><li>• revisit UFTI and Connected Centres;</li><li>• use evidence-based analysis to evaluate the extent to which the plans match the aspirations in the Smartgrowth Strategy;</li><li>• explain to the public why the possibility of rail hasn't been included (or better still, provide for rail as part of the network);</li><li>• look at more innovative ideas around public transport;</li><li>• explain how all the pieces are to fit together (eg bus services, park n rides, on demand transport, services for the mobility impaired, services to frequently visited places) etc.</li></ul>

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		86	10	Ngai Tukairangi Hapu Trust	<p>8C. Matapihi shared pathway: The issue of cycling safety within Matapihi, as outlined in our Hapu Management Plan, is also of concern. Currently, the absence of a separate cycleway within Matapihi necessitates the use of shared pathways with pedestrians. This shared pathway, serving as the primary route from the Bayfair area to Te Papa, is heavily utilised by cyclists commuting to and from 8C(1). Critical considerations must be made regarding the adequacy of the shared pathway. This assessment includes evaluating the availability of sufficient lighting to ensure the safety of cyclists, especially during low-light conditions. Moreover, the congestion on the pathway sometimes compels cyclists to use the road, posing hazards both to them and to vehicles. This situation necessitates urgent work. However, the question arises: is the existing shared pathway adequate to accommodate the volume of traffic it sustains? measures to guarantee the safety of all individuals using these routes.</p> <p>To address these challenges, comprehensive strategies through the SGS must be implemented. This includes the installation of adequate lighting along the shared pathway, enhancing visibility and ensuring safe passage for cyclists during darker hours. Moreover, exploring options for widening the pathway can help alleviate congestion and reduce the temptation for cyclists to use the road.</p>
		91	22	Sustainable Bop Trust	12. Why are park 'n rides still a side issue? (i.e. not enough of them planned)
	4: Road Improvements	12	4	N/A, Haley	Make the harini bridge link into the city 4 lanes because half of the bop uses that route- its a no brainer that should have been done years ago!!
		50	2	Lucas, David Thomas	There seems to be no mention of upgrading the SH2 intersection before increasing the housing in Omokoroa. With more housing, obviously comes more traffic. and more frustration. A Sensible reduction in building further housing would be a good start. Lets get the infrastructure right first. But you know this.!
		55	7	Holyoake, Peter	<p>1. Road development priority: CONCERN: Existing major commuter routes, which will serve the Tauranga Western Corridor development areas, are already congested by existing traffic: a). Cambridge Road joining SH29 - especially in the morning b). SH29 to Tauranga Crossing - in the morning c). Tauranga Crossing to the SH29 junction with Cambridge Road - in the afternoon / evening d). Tauranga Crossing to Pyes Pa along SH29. Further development in the Western Corridor will encourage traffic in the Tauriko and Pyes Pa areas and will add to this congestion UNLESS alternative routes are made available FIRST. RECOMMENDATION: Prioritise the construction of a direct link from SH29 into the Tauriko Industrial Estate (Gargan Road, as an example, may have been a direct link, if it was large enough with good access / egress from SH29). This will reduce congestion at a, b and c above.</p>
		63	2	Landsdale Development Ltd	There is a existing, known capacity issue along SH29A as such any funding and acceleration of the upgrade of this corridor is beneficial to the wider area.



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		70	3	Element Imf Ltd	<p>Updating the directive as above would provide support at a policy level for a number of the "Critical Enabling Infrastructure" transport requirements identified for the Western Corridor in the FDS (Table 1, page 152), which Element IMF support, including:</p> <ul style="list-style-type: none"> <li>• Tauriko West Enabling Works - Transport Improvements including public transport, walking and cycling</li> <li>• Tauriko Network Connections (Stages 1-3) - SH29 and 29A</li> <li>• Tauriko Network Connections (Stage 4) - SH29 and 29A</li> <li>• Western Corridor Ring Route (SH29 to SH36 - Tauriko Stage 3 Ring Route)</li> </ul> <p>Further to the above, Element IMF likewise supports the footnote to the FDS Western Corridor "Critical Enabling Infrastructure" table, which outlines:</p> <p>"SmartGrowth partners have agreed there is a strong preference and need for Western Corridor transport improvements to be delivered in a single stage within a decade (by 2034) as opposed to the proposed staged delivery over many years potentially extending until 2050 given the significance of the corridor locally and nationally."</p> <p>Given this, we seek that the timeframe for delivery of the Tauriko Network Connections (Stage 4) - SH29 and 29A improvements be identified as "medium" rather than "long" to align with the 2034 timing horizon.</p>
		71	4	Zespri International Limited	Tauriko is a major growth area for Tauranga city, with developed residential land and the Tauriko business estate. Transport connectivity has been the barrier to developing desperately-needed housing supply in this area, negatively impacting affordability. Short-term improvements are underway but need to be completed with urgency.
		71	6	Zespri International Limited	<p>Mount Maunganui Industrial Area</p> <p>5.6 Hewletts/Hull/Totara is a key access point in Mount Maunganui, linking the port, airport, and Tauranga suburbs, as well as being a highly valuable and productive industrial area. This access point is at capacity, severely affecting access to work and stunting productivity.</p> <p>5.7 For context, the kiwifruit industry expect to see 300 daily truck trips to and from the Port of Tauranga during the peak of the 2024 season. This number will increase as more orchards come into production.</p>
		80	1	Hickson, Paul	<p>1. Road congestion is impeding economic growth and costing existing business and resident money through traffic delays and slow travel to work. E.g. Tauranga Harbour Bridge/Hewletts Road.</p> <p>2. Proposed industrial parks in Papamoa and Rangiuru need to be serviced by good roading. This would apply in other areas. E.g. Rotorua - Te Ngae Road.</p> <p>3. The recent floods in the Eastern Bay illustrate the logistics problems caused by networks that do not have alternative routes within a reasonable distance. I have experienced long delays in recent years on SH2 near katikati and at Waitangi, near Te Puke through accident holdups or resealing holdups. Damage to the bridge over Kaituna River would be a costly exercise for the kiwifruit industry harvesting with the alternate route being via Hamurana/Pyes Pa.</p> <p>4. With the continuing population growth it is important the roading network keeps safe.</p> <p>5. I would support tolling on specific routes and where a linked network is established would support cross subsidy id an economic benefit could be argued.</p> <p>Comment on above from October 2023 perspective -</p> <p>Road congestion - add Totara Street and Tauriko area and need for bypasses at Katikati and Te Puke.</p> <p>Industrial Parks - TEL provides good access to Rangiuru Business Park</p> <p>Alternative routes - TEL fixed Kaituna problem.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		81	14	Urban Task Force	It is important that the strategy identifies the need for regional cooperation, particularly in relation to the need for freight links (with State Highway 29 being located both within the Waikato and Bay of Plenty regions) and the role of the Port of Tauranga in New Zealand's future. Freight volumes will only grow as the Auckland Port closes. The Port of Napier is relatively disconnected and the Port of Whangarei is geographically isolated. Freight volumes will continue to expand as will the demand for local industrial land associated with import/export and port related activities.
		86	9	Ngai Tukairangi Hapu Trust	<p>8B. Traffic/road improvement projects:</p> <p>The rapid growth of the Bay of Plenty region necessitates constant upgrades to its roading and traffic systems, particularly in the bustling Mount Maunganui and Arataki area. The recently initiated Hewletts Rd flyover project is a case in point. While these major roading projects aim to alleviate congestion, they have a direct impact on the day-to-day traffic flow in Matapihi. The community of Matapihi faces a unique challenge due to its singular entry and exit point, linking up to a major roundabout.</p> <p>We are steadfastly against the imposition of carpark meters in the Mount Maunganui area. The devastating impact of parking charges is evident in the Tauranga CBD, and we oppose their imposition in our other rohe. In addition, we are concerned with the overzealous impact of multiply user interests on our roadways, including cyclists, buses, traffic, parking and so forth. The impact is messy, and devastating for businesses.</p> <p>8B(1). This situation highlights a pressing concern regarding traffic flow within Matapihi. Given the community's singular route in and out, it is imperative that the Matapihi community's needs and concerns be prioritised in the Council's considerations during discussions surrounding such roading projects. The impact of these projects on our daily lives, accessibility, and overall well-being cannot be overstated. Consequently, it is essential for Council's to continue to actively engage with the hapu and the Matapihi community, seeking our input and feedback to ensure that any roading developments align with our community's requirements.</p>
	5: Port of Tauranga Infrastructure upgrade	71	10	Zespri International Limited	<p>5.17 NZCCO, of which Zespri is a member, commissioned an independent report anticipating how the cargo and logistics sector will transform in response to government policy and the impact of COVID-19. Key findings were released in September including:</p> <ul style="list-style-type: none"><li>• Bottlenecks in road access to New Zealand ports - particularly Ports of Auckland, Port of Tauranga and Port of Lyttleton. Recommends designating port access roads as State Highways rather than local roads.</li><li>• Lengthy delay to the Port of Tauranga wharf extension restricting access to larger ships</li><li>• Need for more accurate, integrated data and freight forecasts</li><li>• Calls for depoliticised 30-year supply chain infrastructure planning</li></ul> <p>5.18 We also note this aligns with Business NZ's call for Te Waihanga/Infrastructure Commission mandate to be expanded to focus on building the most creative ways possible across central government, local government and the private sector.8</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		71	7	Zespri International Limited	<p>5.7 Zespri requests the scope of the transport chapter to be extended to include support Port of Tauranga infrastructure upgrades, in the form of streamlined consent processes which would:</p> <ul style="list-style-type: none"> <li>• Unlock future economic growth, providing job opportunities here in the Bay of Plenty,</li> <li>• Create opportunities for bigger ships to call, increasing per sailing capacity to help reduce port congestion,</li> <li>• Create opportunities for bigger ships with lower emissions technologies to call at New Zealand ports,</li> <li>• Give the business sector confidence to invest in regional development, supporting industry value creation, and</li> <li>• Improve regional, national and international supply chain resiliency.</li> </ul> <p>5.8 With upgraded port infrastructure and the right settings in place, the size of the opportunity for our industry and New Zealand Inc is immense. Projections show the New Zealand kiwifruit supply could double volume growth compared to 2022 and double value growth by 2030 to over \$7 billion in sales.</p> <p>5.9 Zespri used 57 charter sailings last year and an additional 13,300 containers, equating to over 172 million trays (1 tray = 3.6kg) of New Zealand kiwifruit shipped to over 50 markets around the world. This amount will increase as the industry continues to grow. We estimate the use of containers to more than double by 2031.</p> <p>5.10 As it stands, the Port of Tauranga's Sulphur Point container berth requires an extension to absorb the increasing demand, where freight volume is forecasted to grow 49-61 percent over the next 10 years. The construction of the berth extension is funded by Port of Tauranga however this is facing an uncertain but long time frame due to the consent sitting with the Environment Court, posing a major risk to New Zealand's imports and exports beyond 2025.</p> <p>5.11 The Port stated in August 2023 that it will run out of space for its container operations in the next two years.</p> <p>5.12 COVID-19 highlighted the significant underinvestment in port infrastructure worldwide, with government policies in response to the pandemic disrupting supply chains and changing consumption patterns worldwide, resulting in significant disruption, uncertainty and rising costs. Together with geopolitical changes, global supply chains are changing significantly.</p> <p>5.13 There is a long-term trend toward larger vessels, driven by cost-efficiency and climate change policy factors (ie low-emissions vessels are generally larger), meaning shipping lines will want to bring larger vessels to New Zealand in future.</p> <p>5.14 Ships using alternative lower-emission fuels will require separate supporting infrastructure to bunker and refuel - all of which requires investment and consents.</p>
		81	15	Urban Task Force	<p>The Strategy should contain actions in relation to this, including a close working relationship with neighboring Councils (particularly the Waikato and Futureproof). Better/safer highways and rail for passengers and freight between the inland and coastal ports is required as an action. In relation to employment land in the eastern Corridor, industrial zoned land adjacent to the eastern railway link needs to be properly planned as a freight feeder and distributor for the Eastern BOP and Port of Tauranga, and not be excluded from a rail connection. The current line is only at 30% capacity. An action is required to enable this in the implementation and funding plan. Contributions to growth and infrastructure required from the Port of Tauranga should also be identified (particularly in relation to the provision of infrastructure and transport upgrades) in the implementation Plan.</p>
	6: Carbon emissions	91	18	Sustainable Bop Trust	<p>Why is there no solid carbon emissions analysis?</p> <p>7. Is there any evidence at all that implementing the Strategy will result in the required big reductions in carbon emissions?</p> <p>8. If not, why is that acceptable?</p>
		91	23	Sustainable Bop Trust	<p>13. Can we afford to invest in low carbon infrastructure e.g. a rapid transit network, likely to be the best way to cut transport emissions? (the carrot to go with the road pricing stick)</p>

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		91	6	Sustainable Bop Trust	<p>Carbon Emissions</p> <p>A major concern is the lack of robust analysis around carbon emissions. We have asked for carbon emissions analysis for the Draft Strategy, the Joint Spatial Plan, Te Papa Spatial Plan, Otumoetai Spatial Plan, Mount-Arataki Spatial Plan, UFTI, the TSP and other transport plans, the Tauriko Business Case, the Cameron Rd project, Maunganui Rd project, Civic Centre project, the Domain Stadium Business Case and several other large plans and projects.</p> <p>We have seen hardly any detailed analysis, and what little we have seen is either insufficient to assess the best spatial planning and transport options, or points us in the direction that all the options being considered are high carbon. We understand that further modelling of transport emissions is still being undertaken, but the timing is unclear.</p> <p>Embedded / embodied carbon emissions are also hugely significant in regards to transport infrastructure and other projects, such as the proposed Tauranga civic centre, and we are still not being told if those will be incorporated into any analysis and modelling.</p> <p>We are particularly vexed by comments from the City Commissioners that Cameron Rd is their key "low carbon" project and that the proposed Tauriko Highway project will "fight climate change". Both those statements are untrue. The Business Cases make it clear that both projects will increase emissions rather than cut emissions and BOP Regional Council, TCC and Waka Kotahi staff have all confirmed that. We have seen no projects that show that carbon emissions will be reduced as a result of that project. It seems abundantly clear that the proposed SmartGrowth Strategy is not a low carbon strategy. That alone should require the current process to be halted, in order to change this Draft Strategy to a low carbon strategy.</p> <p>It is 2023. The NZ government has signed up to cut carbon emissions in half by 2030. This SmartGrowth Strategy needs to reflect that reality and become a genuine low carbon strategy.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-10: Social Infrastructure and well-being	1: Oppose	6	3	N/A, Linda	NO
		42	20	Gordon, Carole	To reiterate- there is insufficient focus on planning for people. The items under this heading eg sports fields, playgrounds assume that only children and young people have active lives. Please ensure that ageism is not driving the perspective and that current adult and older people are catered for in such examples of investment. This strategy should lead a longevity wellbeing focus- we cannot afford not too. This, and generalised assumptions on the quality of urban spaces in delivery of Connected Centres is not satisfactory Please include lifelong learning and community facilities for social connectivity and creativity. Homogenised perspectives disrespect diversity and result in diminished social cohesion.
		54	10	Robson, John	No
		55	5	Holyoake, Peter	For connected centres that are not near the new Civic centre I have some comments regarding the provision of community facilities and the location of marae:: 3. SOCIAL - Community Centres CONCERN: Future residential development areas will need access to centrally-located facilities. For example, recent development areas - The Lakes and Tauriko do not have communal external AND internal spaces for community events (playground, park or reserve and community hall) in or close walking distance to their hubs. RECOMMENDATIONS: a). TCC has an excellent record of providing external Reserve space. Continue this in new developments. b. Many existing community hubs (e.g. Greerton, Matua) have schools and community halls close to each other (within easy walking distance). This facilitates parental attendance at public meetings in the late afternoon. Ensure that new development areas include a community hall. Note - if the school is close, the school hall could be shared by the local community after school hours if access arrangements were carefully designed. 4. SOCIAL - Location of Marae CONCERN: Many Marae are located away from existing hubs / connected centres. RECOMMENDATIONS: a). Many marae will need to be relocated to avoid flood risk. Consider the provision of land for the relocation marae in the new development areas.
	2: Well-being	7	3	Angela	Please consider the most vulnerable when finalising the plan - people living in poverty, with disabilities who are disadvantaged.
		42	1	Gordon, Carole	This submission offers constructive evidence-based comment in the context of rapid population ageing in the SmartGrowth sub-region, because, according to the National Academy of Science and Medicine, we need to examine longstanding ageism that builds resistance to investing in the potential opportunities of longer lives, leading to significant generational costs from inaction. The UN has declared a Decade of Healthy Ageing to combat ageism, in order to lift sustainable policy platforms that improve the lives of Elders, their families and communities. All expect to stay well, live well and contribute to their family, whanau and community. A healthy later life is crucial part of the social contract.  Societies achieving healthy longevity will benefit at large scale from enhanced human, financial and social capital contributions from older people. This will improve economic societal wellbeing, as well as the success of young people.

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		42	10	Gordon, Carole	It will be an easy logic to undertake social infrastructure and community amenity investment that aligns ecosystems with sustainability and age-friendly design considering a social equity and healthy longevity lens. 2.3 It is vital that hyperlocal community development is a co-design process. 2.3 Integrate community health care service delivery into the SmartGrowth strategic framework with as a transformative action. Connectivity is essential to ensure equitable access to timely care.
		42	15	Gordon, Carole	3.2 Ensure hyperlocal community development and the provision of health services is a parallel development.
		53	13	Bowden, Beth Willard	Possibly because of its emphasis on bricks and mortar, the Strategy is light on the specific necessities of supporting an ageing population as well as an increasing number of young, predominantly Maori, families within communities whose increase is largely due to migrants (both New Zealanders and elsewhere).
		69	2	Pirirakau Tribal Authority - Incorporated	Pirirakau and local community wish to retain the uniqueness of the rohe. We seek to build the essence of this as unique set apart from urbanisation. Key facilities that are missing such as retirement facilities and other necessary services can be designed and allowed for in these ways. We do not have to all fit into the growth strategy to take it all.  20. Invest into the current community facilities and amenity available offsetting from all of the wider development as financial contribution offsets.
		76	2	New Zealand Kiwifruit Growers	The SmartGrowth Strategy, while focusing on the broader community development, needs to include the integration and well-being of RSE workers, understanding their role in the BOP regions community. Key areas to focus on should include:  1. Community Integration and Cultural Understanding: Address misperceptions and incidents that may arise due to cultural misunderstandings, such as the concerns raised over RSE workers' behaviour outside Kava Bars in Te Puke. Strategies could involve educational programs, community dialogues, and cultural exchange initiatives that enhance mutual respect and understanding.  2. Engagement and Well-being Initiatives: Expand on existing employer-led engagement efforts, like the rugby match organised by Pacific Island Rugby, to include broader, structured community programs. These should focus on the well-being of RSE workers, incorporating mental and physical health support, and offering a range of social and recreational activities.  3. Customs and Celebrations Inclusion: Introduce RSE workers to local customs and involve them in regional and national festivities, thereby fostering a sense of belonging. Initiatives could include traditional powhiri welcomes, involvement in local church services, celebration of their national Independence Days, and more.  4. Collaboration with Existing Programs: While programs like "Welcoming Communities" led by Immigration NZ exist for migrants, there's a need to either expand these to include RSE workers or create new, tailored initiatives. Collaboration between local governments, businesses, and community groups is essential for the success of such programs.
		77	0	SocialLink	In 2022, via the Social Sector Forum, it was proposed that there remained a need for a social wellbeing lens on the implementation phase of SmartGrowth, to ensure risk of social wellbeing was mitigated, while enhancing the benefits of projects to impacted communities. Social Impact Assessments were a proven methodology that analysed, monitored and managed the intended and unintended social consequences (both positive and negative) of planned interventions. The proposal (which Social Link supported) recommended Social Impact Assessments be undertaken on projects that were likely to have significant risks and/or opportunities to social wellbeing, as well as monitoring the implementation of the assessments.
		91	25	Sustainable Bop Trust	16. Does the Strategy account for and meet the needs of the large and 17. increasing numbers of people with disabilities and mobility issues?

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	3: Support	17	4	Pirere, Tania	Very whanau oriented maketu is that's what I love about this community both.local Pakeha and maori whanau awesome
		39	13	Bennett, Pauline	Implement Live, Work, Play - through the use of local facilities e.g. schools, tertiary education facilities, churches, halls.
		53	12	Bowden, Beth Willard	It is very difficult, as the Strategy itself demonstrates, to identify the important elements at work here and I applaud the emphasis placed on networks as well as health care and schools. It places strong emphasis on physical infrastructure and facilities and the link between these and "an established population". An unstated challenge, however, is the relationship between the dynamic demographics described throughout the Strategy and the continuing appreciation of the long-term benefits of public parks, community centres and other gathering places (whether actual or virtual).
		59	13	Ministry Of Education	<p>The Ministry is supportive of the focus within the draft Strategy on the importance of social infrastructure in supporting well-being. The Ministry supports the Strategy's focus on a network approach to the provision of social infrastructure. This acknowledges that each network of facilities functions as a whole, to provide a balance between locality, accessibility and economies of scale. The network is generally characterised by two different levels of provision; 'sub-regional/citywide' and 'local'.</p> <p>As set out in the draft Strategy, in some cases, existing schools in the Western Bay of Plenty sub-region are at or nearing capacity. This is a result of rapid population growth in specific areas and the complexity of delivering additional educational infrastructure due to funding, planning, land or other constraints. The Ministry seeks to work proactively with the Smart Growth partners to understand the timing, staging, location, type and quantum of growth to ensure the Ministry can respond.</p>

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SGS23-11: Economic wellbeing	1: Support	3	1	Wansbrough, Nathan James	Yes
		48	2	Tauranga Business Chamber	Overall, the wider business community likes certainty. While there are matters throughout this strategy that businesses would not support. On balance, and given the dire shortages of housing and employment zones, the business community would support the SmartGrowth partners to focus on delivery and providing certainty to aid business investment. We support that the focus should be less on business attraction; instead, focus on maximising employment density and advancing the innovation and R&D ecosystem to improve the productivity of our existing and natural strengths. We support SmartGrowth's recognition of how interconnected the WBOP subregion is with the upper North Island.
		84	6	Mcmaster, Bill	1.23 Chapter 11 Economic Wellbeing (pg134) - I applaud the recognition in Chapter 11 of the Western Bay being a key location in the Upper North Island freight and logistics network, especially to serve access to the Port of Tauranga, the largest port in the country. I encourage strong liaison and co-operation with Waikato and Auckland partners to ensure that transport links between Tauranga, Hamilton and Auckland, both road, rail and maritime, are enhanced. Joined up regional land transport plans are critical to the development of all three regions and will ensure best possible bids are prepared for Central Government funding for this UNI region. Mutual projects such as SH1 and SH29 improvements on the SGS Western Corridor are vital to ensure efficient transport links are achieved.
	2: Oppose	6	7	N/A, Linda	NO
		17	1	Pirere, Tania	Just leave our aera alone maketu has its own natural qualities,we don't big flash houses or over pollution only tanga whenua have the right to their takiwa.Thats Te Awara for yeah ah trying to turn our beautiful maketu in a minute rotorua save it.
		28	1	Thorpe, Andrew	Not sure
		47	10	Fitter, Julian Richmond	This has to be focussed on environmentally friendly industries, primary industries are inherently bad for the environment unless they are firmly focussed on minimising that impact. There is no evidence that this is the case.
		47	8	Fitter, Julian Richmond	Our econoic wellbeing is dependent on the wellbeing of our environment and that in turn is dependent to a large extent on our climate and that in turn will affect sea levels, a farly critical issue in the BoP. We need to be absolutely sure that all our developments are focussed on minimising environmentakl impact and CO2 emissions - I do not get any sense that that is a priority, excpet in some fine words.
		54	11	Robson, John	No
		66	8	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	GB considers that additional wording should be inserted to recognise and support existing industrial activities that provide for economic and housing growth and both a regional and national scale. Insert a new economic objective: Enable and support the continued establishment , operation and maintenance of existing industrial activities that contribution to the regional and national economy.
	3: Economic assumptions	48	3	Tauranga Business Chamber	Housing is critical for the region staying economically competitive. Based on current projections, the supply and demand trend of local housing varieties is becoming a major issue for businesses (e.g. staff are asking for higher wages to keep up with rising mortgage and rental costs). Although it's out of scope, we support SmartGrowth recognising that a growing proportion of the WBOP subregion's workforce will be living in the Waikato and commuting on SH29. Travel times from Papamoa/Te Puke into Tauriko and Tauranga's city centre is currently similar to travelling from Matamata/Morrinsville - where rentals and house values are nearly half the price.



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Topic	Issue	Sub ID	Sub Point	Name	Summary
		53	1	Bowden, Beth Willard	In my view the likely effects of global conditions-change (the "Global context", pp. 28-29) on economic projections that underpin this Strategy are insufficiently accounted for. The continuing assumption seems to be that growth will pay for growth and that markets can and will indefinitely adjust, in their infinite nimbleness and flexibility, to changing circumstances. The history of the industrial revolution (to offer a modern example) shows us that, absent other extrinsic pressures, both producers' and consumers' enlightened and immediately proximate self-interest tend to prevail. <ul style="list-style-type: none"> <li>• The shortcomings and challenges outlined in the Strategy are evidence of the gaps that can develop in such circumstances</li> <li>• The analytical charts on page 136 are certainly useful but it is unclear where the projected employment numbers come from</li> <li>• "Taking account" of neighbouring regional and sub-regional economic development plans is an inadequate acknowledgement of Tauranga's place in the "golden triangle" alongside Auckland and Hamilton</li> </ul>
	4: Economic growth	65	3	Te Puke Economic Development Group	With such strong economic drivers, new housing & industrial and commercial zones will need to be planned and delivered in close proximity to our economic activity. The Te Puke region must be categorised as high priority. We encourage Smart Growth to listen to and work with Business and Industry groups that bring knowledge and direct connection to economic sectors and local communities. Smart Growth management has detailed projections for both industry and population growth. We also remind you of our previous submissions in 11/2016, 11/2018, 12/2019, 02/2020, 02/2021 and numerous tours of the Te Puke region for Smart Growth leaders and staff on which we highlighted future needs and introduced them to real people with considerable local knowledge.
		66	12	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	GB considers that support should be provided to existing local industries that have functional/operational need to locate ant the Port and which provide for construction materials that assist in housing delivery. Insert new directives as follows: 1. Support and realise tangata whenua aspirations for Maori land and papakainga development in urban areas and in the rural environment. 2. Deliver the place-based housing plan through collaboration and leadership. 3. A range of housing types, tenures and price points is provided within all growth areas and Maori land. 4. Affordable housing supply is increased and targeted to stressed households (renters - submarket and market; alternative tenures; progressive ownership; iwi). 5. Urgently reduce households being housed in unsatisfactory emergency accommodation. 6. Public housing supply is increased and aligns the typologies of new and existing housing stock to match the needs of the community. 7. Demonstrate mixed tenures and housing typologies through intensification projects. 8. Proactively support the delivery of social and affordable housing in existing urban areas and growth areas. 9. Proactively supports local industrial activities that have a functional/operational need to locate ant the Port of Tauranga 10. Proactively support local industrial activities that provide housing construction materials to assist in housing delivery both regionally and nationally.
		71	8	Zespri International Limited	5.15 New Zealand ports are a critical piece of New Zealand infrastructure and a gateway for the New Zealand economy. Port companies, along with industry, can invest in upgrades and further development but the lengthy processes are costly and hold New Zealand businesses back from meeting current and future demand and increasingly risk making us an inaccessible and expensive trading partner.
		87	6	Ngai Tukairangi Trust	Being involved in commercial property development can offer a number of opportunities to tangata whenua to participate in economic development, wealth creation, and the preservation of cultural sites. Maori land trusts have shown they can play a significant role in commercial property development by utilising whenua Maori and resources to generate income, support community development, and promote economic self-sufficiency. The Trust has been able to successfully do this through horticulture, but with the supply of HPL dwindling, it is imperative the Trust is looking for ways to diversify their portfolio and venture into other investments. <p>The Trust would be very interested in identifying opportunities where they could invest in commercial property development that aligns with the economic needs and goals of Matapihi and our wider hapu boundaries. We would also consider how we could work with commercial property developers, working within our hapu domain, on the design principles and any potential cultural references.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		94	1	Katikati Community Board	<p>With a population of approximately 15000 residents and GDP in excess of \$2b, our contribution to the national economic effort is both important and impressive. Whilst this capability is strong the challenge is the aging population of the region. There is a need for further economic development to attract younger families and skilled employees into the region for economic well-being and social continuity. Katikati will continue to grow. " "Katikati needs to renew its economic drive. Our key economic driver is the Avocado industry but kiwi fruit is important and is growing but projected to only add 17 permanent jobs over the next 5 years. The Katikati Community Board has identified 3 legs to this economic renewal – being a destination town, the Business Park and an environmental hub with a focus on eco-agriculture development. The Katikati Business Park will create more jobs and added value and the full scope of eco-agriculture will create new jobs and innovation. With such strong economic drivers, new housing &amp; industrial and commercial zones will need to be planned and delivered in close proximity to our economic activity. The Katikati region must be categorised as high priority. We encourage Smart Growth to listen to and work with Business and Industry groups that bring knowledge and direct connection to economic sectors and local communities. Smart Growth management has detailed projections for both industry and population growth. We have developed detailed strategic plans in which we highlighted future needs and introduced them to local people with considerable local knowledge.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-12: Future development strategy	1: Oppose	6	1	N/A, Linda	NO
		8	3	Goodall, Andrew David	no
		23	1	Basher, Bill	Could be done quicker and better, not so sure about priority on down town
		33	1	Sanderson, Nathan John	Trend is Waikato where Councils want us to bring them proposals to help them.  Prole road, Omokoroa - only area in district currently developable. My sister and brother-in-law are currently working here.
		44	2	Conlon, Bruce Nicholas	We have large amounts of land up welcome bay, us and our neighbours combined. Given farming is getting squeezed from many sides, there seems to be a housing opportunity here, with beautiful land and views. There looks to be works planned on roading in future, is it enough and in the right areas of connection?
		47	5	Fitter, Julian Richmond	The UFTI model suggests using Te Puke as an eastern hub, and yet the plan does not include the necessary growth there, even though it has all the required infrastructure and services and so should surely be the key area to the east.
		54	12	Robson, John	No
		61	7	Child Poverty Action Group	Greenfield urban developments; The Strategy relies on Greenfield urban developments to provide 64% of the new housing supply. We believe that repeating the current subdivision model such as we see today at Omokoroa and Papamoa East is not an option. The price of purchasing and developing land is simply not affordable and financially favours developers.
		81	9	Urban Task Force	There is a need to deliver housing and business land in a timely and efficient manner as Tauranga is now the worst performing Tier 1 Council under the NPS-UD in terms of housing supply and housing affordability. The Smartgrowth Strategy must adopt a more enabling and fluid policy position to enable the delivery of residential and employment land based on a corridor approach. Key actions are required such as the ability to efficiently deliver and service land with respect to infrastructure. Sound engineering solutions which enable land to be developed should be applied and feasibility assessments must be required to ensure that ultimately the development of land is feasible in order to deliver housing. These are all actions that require inclusion in the Strategy. The "lead time to Development" identified on page 144 of the Strategy needs actions included in the Strategy to support a reduction in the development timeframes. Much of the delay is due to poor Council Plan Change and District/Regional consent processes. The need for urgent action and collaboration implicit in the Draft Strategy is not currently translated into delivery. Further actions are needed to require Smartgrowth Partners to sufficiently resource processes, and to offer fast track Plan Change and premium consent processing services. These Actions will greatly assist with the supply of land from Priority Development Areas identified in the Strategy.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		83	7	Bell Road Limited Partnership	Significance of the Future Development Strategy The significance of the Future Development Strategy (FDS) as a joint strategy within the overall urban growth policy system should not be underestimated. The FDS is the primary long-term strategy on which large-scale, long-term decisions and investments are based, by both the public and private sector. The FDS effectively replaces the content of the Regional Policy Statements urban growth policy. The FDS should therefore be a very stable policy instrument. It is implicit that where an area is identified for growth and the Smartgrowth Partners have agreed on its overall appropriateness, including the trade-offs that have been made, no growth options occur without costs or impacts being properly considered. Feasibility is critically important and further policies are required to be included which require the economic feasibility of sites to be considered as a key consideration. For example, high value kiwifruit land to the east of Paengaroa and beyond is unlikely to be feasible to be developed for residential or employment purposes. Further policies are required in relation to the need for feasibility. When SmartGrowth Strategy implementation occurs through RMA and other processes or systems, there should not be fundamental disagreement from any SmartGrowth Partners on the direction. The focus at that point should be on implementation, and not the Strategy itself.
	2: Infrastructure Readiness	2	5	Smith-Kerr, Stephanie Heather	I don't think development should be considered until infrastructure is already in place.
		43	1	Palmer, Aimee	I think more focus needs to be put on the infrastructure that is going to support the growth of the western bay/ Tauranga area. This is evident in the likes of Hamilton where there is significant issues with infrastructure capacity which have had to have been fixed now which is more difficult than if it was addressed at first hand.
		67	5	Ford Land Holdings Pty Ltd	FLH requests that the Table on page 151 be amended as follows: Add: a) Public transport infrastructure and associated transport corridors for Te Tumu as identified in the Waka Kotahi Single Stage Business Case; Medium Term, Subject to Business Case. b) Kaituna Link transport connection from the eastern end of Te Tumu to Rangiuru; Long Term. c) Te Tumu WWPS to Wairakei WWPS and Opal Drive WWPS including associated Rising Main Connections to Te Maunga WWTP; Medium Term, Subject to WSE Funding. d) Establishment of a new co-educational secondary school; Medium Term, Subject to Bus Case. e) Establishment of a new primary school; Medium Term, Subject to Business Case. Amend: a) Te Tumu Trunk Mains to read Te Tumu Water Trunk Mains.
		67	8	Ford Land Holdings Pty Ltd	FLH requests that: a) The Public Transport Item has a new item; PT connections Tauranga to Papamoa East Medium Term (2027-2034). b) The Community Facilities / Social Infrastructure Item has a new item; Active Reserve at Papamoa East - Te Tumu Medium Term (2027-2034).

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		67	9	Ford Land Holdings Pty Ltd	FLH requests that: a) The Public Transport Item has a new item; PT connections Tauranga to Papamoa East Medium Term (2027-2034). b) The Public Transport Item has a new item; Te Tumu Collector Roads in the 2027-2034 period. c) The Road Network Item has a new item; Te Tumu Collector Roads in the 2027-2034 period. d) The Road Network Item has a new item; Te Tumu Structure Plan Projects in the 2027-2034 period. e) The Road Network Item has a new item; Kaituna Link Transport Project in the 2034-2054 period. f) The Wastewater Item has a new item; Te Tumu Structure Plan Projects in the 2027-2034 period. g) The Water Supply Item has a new item; Te Tumu Structure Plan Projects in the 2027-2034 period. h) The Stormwater Item has the item; a new item; Te Tumu Structure Plan Projects in the 2027-2034 period. i) The Stormwater Item has the item; Wairakei to Kaituna Overflow - Phase 2 moved to 2027-2034. j) The Community Facilities / Social Infrastructure Item has a new item; Active Reserve at Papamoa East - Te Tumu Medium Term (2027-2034). k) The Education Item has a new item; New co-educational secondary school and Kura at Papamoa East - Te Tumu Medium Term (2027-2034). l) The Education Item has a new item; New primary school and Kura at Papamoa East - Te Tumu Medium Term (2027-2034).
		68	6	Tumu Kaituna 14 Trust	TK14 requests that the Table on page 151 be amended as follows: Add: a) Public transport infrastructure and associated transport corridors for Te Tumu as identified in the Waka Kotahi Single Stage Business Case; Medium Term, Subject to Business Case. b) Te Tumu WWPS to Wairakei WWPS and Opal Drive WWPS including associated Rising Main Connections to Te Maunga WWTP; Medium Term, Subject to WSE Funding. c) Establishment of a new co-educational secondary school and Kura; Medium Term, Subject to Business Case. d) Establishment of a new primary school and Kura; Medium Term, Subject to Business Case. Amend: a) Te Tumu Trunk Mains to read Te Tumu Water Trunk Mains.
		68	8	Tumu Kaituna 14 Trust	TK14 requests that: a) The Public Transport Item has a new item; PT connections Tauranga to Papamoa East Medium Term (2027-2034). b) The Community Facilities / Social Infrastructure Item has a new item; Active Reserve at Papamoa East - Te Tumu Medium Term (2027-2034).
		68	9	Tumu Kaituna 14 Trust	TK14 requests that: a) The Public Transport Item has a new item; PT connections Tauranga to Papamoa East Medium Term (2027-2034). b) The Public Transport Item has a new item; Te Tumu Collector Roads in the 2027-2034 period. c) The Road Network Item has a new item; Te Tumu Collector Roads in the 2027-2034 period. d) The Road Network Item has a new item; Te Tumu Structure Plan Projects in the 2027-2034 period. e) The Wastewater Item has a new item; Te Tumu Structure Plan Projects in the 2027-2034 period. f) The Water Supply Item has a new item; Te Tumu Structure Plan Projects in the 2027-2034 period. g) The Stormwater Item has the item; a new item; Te Tumu Structure Plan Projects in the 2027-2034 period. h) The Stormwater Item has the item; Wairakei to Kaituna Overflow - Phase 2 moved to 2027-2034. i) The Community Facilities / Social Infrastructure Item has a new item; Active Reserve at Papamoa East - Te Tumu Medium Term (2027-2034). j) The Education Item has a new item; New co-educational secondary school and Kura at Papamoa East - Te Tumu Medium Term (2027-2034). k) The Education Item has a new item; New primary school and Kura at Papamoa East - Te Tumu Medium Term (2027-2034).

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		76	9	New Zealand Kiwifruit Growers	<p>The SmartGrowth Strategy is silent on the future demand for aggregate and where this will be sourced from. Like many others in the sub-region, growers and postharvest facilities rely on good roads. They are essential to ensuring that the fruit can be efficiently transported for packing and shipping.</p> <p>In our view, the demand for aggregate will likely increase for a number of reasons, firstly to support subdivisions and also to maintain roads that are likely to be affected by climate change. It may be that this has been considered elsewhere but this is not clear.</p> <p>In our view, aggregate demand needs to be estimated and future quarries identified and ringfenced to ensure that it can be affordably supplied in the future. Building houses on these areas would effectively sterilise them.</p>
		84	5	Mcmaster, Bill	<p>1.20 Both Transport (Chapter 8) Three Waters and Other Infrastructure (Chapter 9) will be significantly impacted by TCC proposed Plan Change 33 which will increase dwellings significantly in Mount North without any assessment of the impacts on transport, three waters and other infrastructure. This is out of line with the SGS objectives and implementation plan and could place considerable extra expenditure on the subregion to fund infrastructure improvements. This could compromise the SGS wider Western Bay priorities for infrastructure spend.</p>
		89	1	Transpower New Zealand Limited	<p>At the outset, Transpower is grateful for the opportunity to provide feedback on the SmartGrowth Strategy and supports its outcomes in principle. That said, aspects of the SmartGrowth Strategy need to be reviewed and updated to ensure that it meets the requirements for FDSs as set out in the NPSUD.</p> <p>In reviewing the SmartGrowth Strategy Transpower has been guided by SmartGrowth's obligations for preparation of an FDS set out in Subpart 4 "Future Development Strategies" in the NPSUD. The section "What is SmartGrowth" states on page 10: "In 2021, SmartGrowth began work on a Joint Spatial Plan. This Plan was put on hold so that it could integrate with a wider update of the SmartGrowth Strategy as a whole. This updated Strategy includes a future development strategy as required under the National Policy Statement on Urban Development." This means that the SmartGrowth Strategy is required to include and be informed by specific matters set out in sub-part 4 of the NPSUD. Transpower's comments on these matters are captured under the sub-headings below.</p> <p>What FDSs are informed by (NPSUD Section 3.14(1)(f))</p> <p>Section 3.14(1) of the NPSUD states that "every FDS must be informed by the following...(f) every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement." While the SmartGrowth Strategy includes a description of the "National context" including some national direction at page 29, the "Requirements" for spatial planning set out on page 47 do not include the NPSET in the "National environmental requirements". Under the RMA there is no hierarchy between national policy statements (NPSs). This means that the NPSET has equal weight alongside the other NPSs listed in terms of informing the SmartGrowth Strategy and fulfilling the requirements of an FDS under the NPSUD. Transpower observes that the SmartGrowth Strategy doesn't appear to have been clearly informed by the policy direction within the NPSET and wishes to see this addressed in the final version.</p> <p>The NPSET is also relevant in terms of the role that the National Grid will play in the electrification of the economy, both with regard to protecting existing assets, and enabling the construction of new connections to renewable energy and sources of demand. Both concepts are relevant to development and implementation of the SmartGrowth Strategy.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		89	2	Transpower New Zealand Limited	<p>Transpower seeks that the Strategy is updated to not only reference the NPSET as a relevant national policy statement under the RMA on page 47, but also that it demonstrates how the SmartGrowth Strategy has been informed by the policy direction contained within the NPSET. A logical starting point for this would be on page 57 "National environmental requirements."</p> <p>Purpose and content of FDS (NPSUD Section 3.13)</p> <p>This section sets out (among other matters), the purpose of an FDS and the matters that a FDS must spatially identify. In particular:</p> <p>3.13(2)(a) the broad locations in which development capacity will be provided for over the long term, in both existing and future urban areas, to meet the requirements of clauses 3.2 and 3.3.</p> <p>Transpower is neutral regarding the principle of urban intensification and growth areas but considers it essential to show the existing National Grid on specific maps to ensure that the development capacity is correctly informed by the National Grid corridor policy direction set out in the NPSET. See further detailed comments in relation to the "constraints on development" core content requirement below.</p> <p>3.13(2)(b) 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.</p> <p>Transpower supports the reference to power supply on page 124, including the statement that "Power supply faces similar issues given strong population growth and increased power demand...there is an ongoing need to address reliable power supply issues in light of increased power demand driven both by population growth and electrification and decarbonisation of transport and industry." This statement reflects the preamble of the NPSET which states that ongoing investment in the transmission network and significant upgrades are expected to be required to meet the demand for electricity and to meet the Government's objective for a renewable energy future, therefore strategic planning to provide for transmission infrastructure is required. It also reflects the themes identified in the WBOP Development Plan.</p> <p>That said, the SmartGrowth Strategy does not include an assessment of the extent to which electricity supply is sufficient to support development, or recognition of the potential for transmission infrastructure to expand in the future to support electrification. With regard to electricity transmission, Transpower is happy to provide any required information to enable the details of electricity supply to be discussed and recorded accurately, including as necessary to ensure that the WBOP Development Plan demand scenarios align with those in the SmartGrowth Strategy.</p> <p>A final observation with regard to this requirement is that the assessment does not clearly articulate how all "additional infrastructure" has been considered in the context of servicing development capacity.</p>
		92	3	Murphy, Vincent	<p>• Can the transport and utility infrastructure broad development requirements in each corridor, be reflected on a master staging plan? Would seek to see clear commitment to roading, public transport including rail projects across the life of the plan, up-front to then inform implementation plans. Tauranga is well serviced with railway infrastructure, and it appears the city is ripe for coordinated bus (commencing - Cameron Road), and rail investment to improve accessibility around the city, enhance vibrancy of local centres/CBD. Some further scoping/commitments around transport projects as integrated with planned development is requested in the strategy.</p>
	3: Maps	47	3	Fitter, Julian Richmond	Your cartographer appears not to know where Paengaroa is situated, it is consistently shown as Pongakawa.
		53	6	Bowden, Beth Willard	<p>• How do the stated figures for connected centres ("200,000 additional people creating nearly 40,000 new jobs and 95,000 new homes across the sub-region" map on to those cited in other chapters of the Strategy?</p>
		59	11	Ministry Of Education	<p>It is noted that the potential long-term areas shown on Map 12 are those identified in UFTI but not yet investigated, consulted on, and confirmed. This seems at odds with Map 18 which shows one of these potential long-term areas (the Eastern Centre) as being a confirmed long-term growth area. This is further discussed in section 6 of this submission.</p> <p>Relief sought:</p> <ul style="list-style-type: none"> <li>- Retain the growth directives as notified.</li> <li>- Retain Map 12 as notified.</li> </ul>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		59	14	Ministry Of Education	Map 17 "Existing and Proposed Sub-Regional Social Infrastructure" shows various categories of schools including kura, primary (including composite and contributing), secondary, and other school types (intermediate, teen, special schools). The scale of the map makes it difficult to determine whether all schools in the sub-region have been included, and the categories used to group different types of schools mean that some schools could be in more than one category. It would be simpler at this scale to group schools together. It is also important to note that the map only shows existing schools, despite the map title which suggests it may include proposed schools as well. Future schools will be planned in line with growth but are not mapped. Relief sought: - Amend Map 17 to clarify that the schools shown on the map are existing schools. - Amend Map 17 to retain kura as one category but re-named as 'existing kura' and group the other school categories together and re-name as 'existing schools'.
		59	16	Ministry Of Education	Amend Map 19 to show the correct location of the Keenan Road growth cell.
		59	5	Ministry Of Education	Some of the maps are more difficult to read than others because of the layering of growth areas on top of the 'no-go' and 'go-carefully' layers. It would be helpful if the 'planned' and 'potential long-term' growth areas could be shown as outlined rather than solid colours, which would make the other layers more easily visible.  Relief sought: Amend maps in Part 3, Chapter 1 so that the 'planned' and 'potential long-term growth areas' are shown in outline rather than as solid colours, so as to allow the other layers to be more clearly visible.
		59	8	Ministry Of Education	Amend Map 5 so that the 'planned' and 'potential long-term growth areas' are shown in outline rather than as solid colours, to allow the areas at risk from climate change to be clearly visible.  Amend Map 6 so that the 'planned' and 'potential long-term growth areas' are shown in outline rather than as solid colours, to allow the areas at risk from climate change to be clearly visible.
		60	8	Tangata whenua collective (CTWF workshop)	Map 2c - there is discomfort that archaeological sites and HAIL sites are on the same map. There is no need for them to be displayed together. Suggest separating.
		67	6	Ford Land Holdings Pty Ltd	FLH requests that: a) Map 18 on page 154 be amended to show Te Tumu moved to Medium Term (2027-2034). b) Map 18 on page 154 be amended to show the Kaituna Link transport connection from the eastern end of Te Tumu to Rangiuru as shown on Map 6 of the 2013 SmartGrowth Strategy. c) Map 19 on page 155 be amended to show Te Tumu with a Potential 6,100+ dwellings.
		68	10	Tumu Kaituna 14 Trust	TK14 requests that: a) Map 18 on page 154 be amended to show Te Tumu moved to Medium Term (2027-2034). b) Map 19 on page 155 be amended to show Te Tumu with a Potential 6,100+ dwellings.
		72	15	Nga Potiki a Tamapahore Trust	Adopt Map 3 as notified, however suggest to tread with caution on identification of all significant cultural areas.
		72	17	Nga Potiki a Tamapahore Trust	Amend Figures 17 & 18 on Pages 71 and 72 to include Section 19 SO 489379, Sections 25, 26 and 27 SO 457368 within the TCC jurisdictional boundaries.
		72	21	Nga Potiki a Tamapahore Trust	NPaTT support the inclusion of Map 20 and seek that the land at Tara Road legally described as Section 19 SO 489379, Sections 25, 26 and 27 SO 45736 be identified for Maori development purposes. Adopt Map 20, with the amendment to include Section 19 SO 489379, Sections 25, 26 and 27 SO 457368 for Maori development.



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Topic	Issue	Sub ID	Sub Point	Name	Summary
		76	3	New Zealand Kiwifruit Growers	<p>The climate change maps that are shown in the SmartGrowth Strategy are confusing. Maps 2a and 4 appear to show that the whole of Matakana Island is subject to coastal inundation. Figure 17, which is a snapshot of climate change risks to the Western Bay of Plenty, appears to show something different for Matakana Island but the legend is confusing. Figure 17 shows considerable river and surface flooding in the Te Puke and Pukehina areas, which are important areas for kiwifruit growing. The area of flooding in Figure 17 appears different to that shown in Map 4. Presumably the identified growth areas are not affected by flooding but the differences in the maps make this unclear. NZKGI wishes to better understand where the areas at risk from climate change are located because this is of interest to growers. NZKGI requested from BOPRC the shapefiles that show the areas at risk from coastal and inner harbour erosion and inundation. In response, we were advised that new information is currently being reviewed and formatted correctly before being made publicly available, which will hopefully be by the end of this year.</p> <p>We understand that the WBOPDC Mapi maps contain the climate change related information at a better scale. Our preference, however, is to wait until the updated maps are available and to review the information then. Presumably the SmartGrowth team will do the same and will make any necessary changes as a result of the new information.</p>
		76	8	New Zealand Kiwifruit Growers	<p>Map 11 shows land use areas including the land that is used for kiwifruit growing. The kiwifruit growing area is based on 2017 data and there has been significant expansion of the industry since then. While it may be considered that there is no need to update the map at this point in time, we note the significant reverse sensitivity issues that can arise when new housing developments are located close to kiwifruit orchards. These issues include complaints regarding agrichemical spraying and audible bird scaring devices.</p> <p>It will be difficult for the potential for reverse sensitivity to be appropriately considered by the planners if they are looking at outdated maps of where the kiwifruit orchards are located. We encourage ground-truthing and the use of appropriate buffer zones to prevent future problems.</p>
		82	10	Batchelar, Craig	<p>Submission: Minor Graphical Change to Map 19 where housing call out box is pointing to the wrong area.</p> <p>Amendment sought: Keenan Road pointer is pointing at the wrong area - should be pointing to the smaller green area to the south-east of Tauriko West.</p>
		82	6	Batchelar, Craig	<p>Some grey areas may be suitable for intensification. Add text to clarify that these areas can be for intensification. Legend might be better reordered, with existing urban areas first, then industry area, then planned growth areas, then potential long-term growth areas. Amend maps so they are shown consistently across all (sometime shown with an outline, sometimes solid colour) Any other corrections/clarifications to the maps required.</p>
		82	8	Batchelar, Craig	<p>Submission: The intensification areas on Map 18 may need to be updated following the MDRS plan change hearings, in particular the label "Medium Density Residential to 20 metres" needs to be clarified. Amendment sought: Delete "to 20 metres". Update any of the intensification areas in line with outcomes from the MDRS plan changes.</p> <p>Submission: "Eastern Centre" and "Western Corridor" (Belk, Joyce, Merrick) are referred to and should be indicated (named) on the maps/graphics.</p> <p>Amendment sought: Identify Eastern Centre and other areas as appropriate, including on on Map 18.</p>
		84	8	Mcmaster, Bill	<p>1.32 Map18 on page 154 of the SGS outlines the FDS Staging Map - Mount North is not identified with an orange dot as High Density Residential apart for the existing area of the High-Rise zoned for part of Mount Maunganui.</p> <p>1.33 Part 5 Implementing the SGS. It is noted in this part of the SGS that the Implementation and Funding Plan (IFP) will be developed as a separate document and updated annually. It is not part of the FDS under the NPS-UD.</p>
		87	13	Ngai Tukairangi Trust	<p>Map 2c - there is discomfort that archaeological sites and HAIL sites are on the same map. There is no need for them to be displayed together.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
	4: Industrial land	49	1	Thwaites, Donald Alan	<p>Further investigation of business land development at Apata is required. Possible Industrial land identified south of Omokoroa is better suited as Omokoroa residential stage 4 and land south of TNL Stage 2 running back to Whakamarama should be investigated as mixed lifestyle/residential to be Omokoroa stage 5.</p> <p>If a secondary school is to be built at Omokoroa , these extended residential growth areas would support the provision of these new schools.</p> <p>The Apata area is worthy of investigation for industrial development.</p> <p>Residential growth in Katikati and Omokoroa would supply ousing for this area.</p> <p>Double tracking of the rail between Apata and Tauranga over the next 50 years would support the port of Tauranga and provide commuter capacity between Apata and Tga / Te Maunga / Te Puke</p> <p>A second Kaimai rail tunnel for resilience and capacity would enhance this transport corridor.</p> <p>Te Puna is not a suitable location for any further industrial activity.</p> <p>Long term (30 years) - a commercial centre to serve a residential Te Puna requires planning . The protection of the Bayfair commercial area from the late 1960's is an great example of long term planning.</p>
		65	5	Te Puke Economic Development Group	<p>Smart Growth has identified shortages in industrial land and the need for new industrial zones.</p> <p>The Rangiuru Business Park is an important part of the solution particularly for larger scale industry.</p> <p>At the same time, it is important that new industrial land is made available in the vicinity of the Te Puke township. The township has a wealth of small to medium industrial businesses and is a strategic location for more growth. Case in point - the existing 'West' industrial zone.</p> <p>Willing land owners, a willing developer and a business investor wanting to make this happen.</p> <p>Unfortunately, the consenting process is slow and frustrating. This is a perfect example of how Smart Growth can make a positive difference by endorsing a sensible growth initiative that will deliver economic benefits. A 'make it happen' attitude, a sunrise frame of mind as opposed to a sunset mentality and a sense of urgency will be warmly welcomed.</p> <p>Enabling swift consenting for the 'West' Industrial Zone will inspire investors &amp; developers and will lead to the identification of other suitable land for development.</p> <p>We acknowledge that climate change is real and risks must be mitigated. Waterways, flood prone areas and roading challenges highlight the need for fit for purpose infrastructure. Overcoming challenges and finding solutions is what Te Puke does best.</p>
		66	1	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	<p>1 This feedback relates to the SGS, and in particular the lack of recognition in that document that existing industrial activities in terms of the contention the SGS. In particular the submission is concerned with ensuring the following matters are recognised and provided for:</p> <p>i. The positive role of existing industrial activities in the regional and local economy</p> <p>ii. The functional need for many industrial activities to be located at the Port of Tauranga</p> <p>iii. the appropriateness of encouraging the effective and efficient use of existing industrial land through continued development and intensification.</p> <p>iv. The role of industrial activities in assisting in the housing supply chain.</p> <p>v. the role of industrial activates in delivering Objective 1, Policies 1(b) and 2 of the National Policy Statement for Urban Development 2020</p>
		66	3	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	<p>GB also supports the acknowledgment that there is shortfall in industrial land, particularly within the Mount Maunganui/Port industrial area, whereby the SGS states that "Growth in the sub-region is such that the housing and business development capacity assessment (HBA) has indicated that there is a shortfall in industrial land. In addition, the SmartGrowth partners have also been working collaboratively on several other projects that relate to industrial land, particularly work relating to the Mount Maunganui/Port industrial area.</p> <p>5 However, GB's key concern that the SGS does not place a strong enough emphasis on protecting and supporting existing industrial activities, particularly within the Port of Tauranga. GB considers that industrial activities, such as those conducted by GB, plays a key role both regionally in terms of the economy and nationally in terms of providing for construction material to assist the housing delivery set out in the National Planning Standards for Urban Development (NPS-UD).</p> <p>6 GB seeks amendments to the SGS, particularly to ensure that the operational and functional need of industrial activities on industrial land within the Port of Tauranga are supported. Furthermore, GB seeks that industrial activities are recognised for their contribution to both the economy and assisting in housing delivery both at a regional and national level.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		66	4	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	<p>14 Under Part 3 'The Spatial Plan - Business Employment Land' of the SGS, it states:</p> <p>"The potential for a reduction in existing land combined with strong demand for industrial land to support growth has meant that additional industrial land needs to be identified. Potential locations for future industrial land have been identified in Part 4 of this Strategy."2</p> <p>15 GB supports the recognition that there is strong demand for industrial land and supporting industrial growth.</p>
		66	6	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	<p>The key concern for GB is that whilst the SGS identifies a range of significant issues, which place pressure on existing industrial land across Tauranga, it does not explicitly recognise the important role industrial activities (including those at the Port) play both in an economic growth but also in the ability to assist in housing delivery. In a spatial sense, GB submits that there needs to be greater support and protection for industrial activities where there is an operational need to locate within the Port Industrial area.</p> <p>GB seeks amendments to draft SGS to ensure that the overall intention to provide for the continued development and intensification of existing industrial land to protect business and industrial land in the most effective and efficient manner, which will in turn assist in the growth of the regional and national economy and assist in housing supply.</p>
		66	7	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	<p>In summary, GB seeks that the SGS strengthens the protection of existing Industrial zoned land in order to give effect to Policy 2 of the NPS UD as it relates to business land. In particular, recognise and make provision in the SGS such that the role of existing industrial land is able to continue to make a contribution to the goal of providing "at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term."8 (emphasis added). To give effect to this, the specific relief (any such consequential relief) sought by GB is:</p> <p>i. Insert additional wording in Part 1: Introduction and Context - Economic Objectives9 to recognise and support existing industrial activities to that provide for economic and housing growth as set out in Appendix B.</p> <p>ii. Amend wording in Part 1: Introduction and Context - Sub-Regional Context- Marine Corridor10 to recognise industrial activities also require shipping links to and from the Port.</p> <p>iii. Amend wording in Part 2: The Growth Challenge - Opportunities11 to recognise that industrial activities are an economic opportunity for the region as set out in Appendix B.</p> <p>iv. Amend wording in Part 3: The Spatial Plan - Chapter 06. Urban Form and Centres12 introduction to recognise that "construction materials" be included as a key industry to the nationally significant Port of Tauranga as set out in Appendix B.</p> <p>v. Insert additional wording in Part 3: The Spatial Plan - Chapter 07. Housing - Housing system growth directives13 that supports existing local industries that provide for construction materials that assist in housing delivery as set out in Appendix B.</p>
		66	11	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	<p>GB recognise that "construction materials" be included as a key industry to the nationally significant Port of Tauranga. Amend second paragraph on page 102 as follows: The connected centres programme also outlines business growth within the sub-region, supporting growth in appropriate areas and enabling reliable movement to and from key industries such as horticulture and construction materials to the nationally significant Port of Tauranga. Currently there is adequate land supply to accommodate business (commercial and industrial) growth in the short term. However, as our sub-region continues to grow, we will need to plan and cater for future demand that supports the connected centres programme.</p>
		66	5	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	<p>However, the 'Urban form and centres growth directives' do not recognise the pressure on industrial land and does not seem to support the continued development and potential intensification of existing industrial land to ensure effective and efficient use of existing industrial land.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		70	0	Element Imf Ltd	Stage 4 of the Tauriko Business Estate was being considered by Tauranga City Council. The area comprised of 92 hectares, of which only 46 hectares were enabled by the first stage of highway works. Once the 46 hectares have been sold the remaining land will be unable to released for a long period of time as there would be no infrastructure to sustain the development.
		74	1	Waste Management Nz Ltd	It is essential that the SmartGrowth Strategy, particularly the draft Spatial Plan and Future Development Strategy, appropriately provide for existing industry and its needs, and recognise the substantial benefits industry provides to Tauranga and the wider region.
		74	2	Waste Management Nz Ltd	In our view, there is a balance to be struck between enabling and providing for industry, that has a practical and substantial economic benefit to the City and Region, as well as providing for intensified residential development and the need to manage future development in hazard-prone areas. Waste Management considers that some of the proposals and directions within the SmartGrowth Strategy require further consultation and ultimately refinement, to ensure they provide for a pragmatic and workable approach to addressing those competing interests.
		74	8	Waste Management Nz Ltd	<p>The SmartGrowth Strategy clearly sets out that the sub-regional demand for business land, including industrial land, is set to grow over the next 30-years. However, it is unclear how the SmartGrowth Strategy intends on meeting anticipated demand for industrial land, in its current form. While there is a clear need for industrial land in the future, similar to the Mount to Arataki Spatial Plan, there is a lack of recognition in the SmartGrowth Strategy around the significant benefits that industry provides, as well as the actions industries currently take to reduce their impacts. Waste Management considers that the SmartGrowth Partnership must provide greater certainty for industries in the SmartGrowth Strategy. This includes through:</p> <p>(a) equal recognition of existing industrial uses, particularly at the Truman Lane Site and the Oil Recovery Site, as well as recognition of the constraints industries face which otherwise hinders their ability to internalise all of their effects, as discussed above; and</p> <p>(b) recognition of the adverse health and amenity effects and reverse sensitivity effects, should residential housing be directed in proximity to effects-generating industrial activity.</p>
		78	1	Clear The Air & Tauranga Moana Fumigant Group	<p>7. The Draft SmartGrowth Strategy identifies the need for a further 300 -400 hectares of greenfield business land over the next 30 years and that technical investigations have identified a number of possible locations for future business land.</p> <p>8. It is not clear whether any of these sites will be able to accommodate heavy industry that causes cumulative adverse effects, particularly on air quality.</p> <p>9. While the intention that all industrial zones should be clean and green is a worthy aspiration, the reality is that all regions need to host industries that generate effects that are hard to manage to a low level of risk, without significant separation from sensitive land uses.</p> <p>10. If provision for heavy industry in specific suitable locations is not made through SmartGrowth, there is no scope for long term relocation of existing heavy industry emitters where those activities are located in unsuitable locations affecting residential areas or sensitive areas such as Whareroa Marae.</p> <p>11. New emitting industrial activities will also need to locate outside the region due to uncertainty of where in the region it is suitable to locate to, increasing costs and carbon emissions from transportation, and pushing pollutants unwittingly onto other host</p> <p>12. All industrial areas need to significantly lift their performance in managing environmental effects to reduce existing impacts on the environment and on the health of people to acceptable levels in or near residential urban or other sensitive activities/areas. All the SmartGrowth Partners need to commit to addressing this through compliance, integrated land use and natural resources management, as well through future plan changes and strategies.</p> <p>13. There is a need to align zoning and plan provisions with the National Planning Standards and differentiate light medium and heavy industry zones. This work needs to be completed urgently. The review needs to involve the Bay of Plenty Regional Council to address integration between land use and the regional plan provisions for air and water quality, and should include collaboration with key stakeholders, such as CTA.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		81	7	Urban Task Force	<p>The Draft SmartGrowth Strategy identifies the need for a further 300 -400 hectares of greenfield business land over the next 30 years and that technical investigations have identified a number of possible locations for future business land. No further business land has been identified in the strategy for the eastern/central corridor. Te Tumu and Rangiuru are already identified in "existing allocations". The Urban Taskforce considers that 60 ha of this land needs to be brought forward. Further land is required to be identified in the eastern/central corridor such as at Wairakei South to cater for future needs, and the assessment tables on page 148 of the Strategy need to be updated.</p> <p>There are significant anomalies between the Aurecon, Phizacklea Consultant's and the Draft Strategy in terms of the identification of employment zoned land. As well as the anomaly with the central/eastern corridor, areas such as Te Puna are absent from the Strategy. Te Puna was the overall top scoring site in the Aurecon Industrial Land Assessment. Instead of Te Puna being identified as a site for business employment land, Te Puna is identified as a "long-term growth area" well outside the strategic planning horizon. Given the Aurecon Assessment and factors such as the Tauranga Northern Link and Omokoroa Pipeline corridors, Te Puna should be included as a short and medium term growth area for business employment land. The approach of excluding Te Puna also conflicts with Marae being treated as Centres (there are 4 key Marae at Te Puna) and the need for Maori housing and employment opportunities to be created as one of the transformational shifts under the strategy identified below. This needs to be resolved through amendments to the strategy and correct interpretation of the supporting technical assessments.</p>
		82	9	Batchelar, Craig	<p>Submission: Add additional text on alongside Map 18 regarding the Industrial Land Study.</p> <p>Amendment: Add additional text to the FDS map alongside the existing text which states: "The Future Development Areas are indicative only". Additional text to state: "The Industrial Land Study has been undertaken using desktop information only, further investigations are required. The locations of potential industrial land as shown on the map are indicative only. For example in the Northern Corridor there are a range of long listed sites in the Apata and Omokoroa area for long-term consideration."</p>
		83	10	Bell Road Limited Partnership	<p>Employment Land Assessment</p> <p>The Draft Strategy identifies the need for a further 300-400ha of greenfield business land over the next 30 years and that technical investigations have identified a number of possible locations for future business land within the Eastern growth corridors.</p> <p>The Draft Strategy notes that:</p> <p>"through more detailed desktop analysis, Omokoroa, Belk Road, and Pukemapu have emerged as the preferred potential locations to provide for business land in the northern and western growth corridors."</p> <p>No further business land has been specifically identified in the draft Strategy for the Eastern/Central corridors. Te Tumu and Rangiuru are already identified in "existing allocations" These areas are excluded from the further 300-400ha required. The primary basis for the Employment Land assessment is the Aurecon Industrial Land Study completed in June 2023.</p> <p>It is noted that there are significant anomalies between the Aurecon Industrial Land Study , Phizacklea Consultants Supplementary Study, and the Draft SmartGrowth Strategy in terms of the identification of Employment Zoned land. The reports show inconsistency of findings. By way of example, sites such as the overall top scoring sites of Te Puna (Aurecon Study) is completely absent from the Draft Strategy and is instead identified as a "long term" growth area, well outside the Strategic planning horizon.</p> <p>This approach also conflicts with the approach of Marae being treated as centres and the need for Maori Housing and employment opportunities to be created as one of the transformational shifts under the Strategy.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		83	12	Bell Road Limited Partnership	<p>Wairakei South Urban Growth Area</p> <p>Wairakei South Urban Growth Area (Wairakei South) lies within a strategic area bordered by the Wairakei residential development, the Kaituna River, and Te Puke and the TEL. The Draft Strategy identifies the Wairakei South land as "Otago 2". The site is the highest scoring site (Aurecon Industrial Land Study) identified in the Eastern/Central Corridor (with a raw score of 54 and a weighted score of 7.415) This study postdates the Phizacklea Consultants report dated May 2023. The Aurecon report assesses the site as follows:</p> <p>The Domain Road 1 and 2, Tara Road 1 and 2, and Otago 1 sites (the site) is located towards the eastern edge of Tauranga City and straddles the boundary of TCC and WBOPDC. The Site is elongated and runs along the Tauranga Eastern Link (TEL), south to Bell Road and the Te Puke Highway, and west towards Bruce Road. The Site is near Papamoa, and the outer extents of the Te Puke area, in close proximity to multiple community facilities such as the Papamoa Library, and local schools and kura. The Site is largely zoned as Rural, with a large portion of the Site subject to a flooding overlay. The Site is also intersected by the East Coast Main Trunk Line railway. This Site fits strategically within the identified freight routes, the existing SmartGrowth growth areas, and the Te Puke growth area of the UFTI report. The most obvious development focus would be on the western land parcels adjacent to TEL (SH2) and Papamoa (Domain Road) interchange, providing easy access and connectivity to priority freight route and PT, and better quality land in terms of flooding and geotechnical characteristics.</p> <p>The Aurecon report also noted for the Central Corridor (Domain Rd 1 and 2, Tara Rd 1 and 2, and Otago:</p> <p>This combined area along the Eastern Link and taking in Domain Road, Tara Road, and Bell Road, was selected with the intent to identify and recommend the more suitable areas within this larger combined area for industrial land development. It is located centrally and has attractive transport and other connectivity benefits; however some significant land quality and capability constraints are evident, including proximity to coast with potential flooding and coastal inundation risks.</p> <p>These flooding, coastal inundation risks and land quality constraints do not relate to the Otago 1 land as The Bell Road LP have confirmed engineering solutions to address flooding, building platform levels and the preloading of sites.</p>
		83	5	Bell Road Limited Partnership	<p>Integrity of the Strategy</p> <p>It is critically important that the integrity of the Draft Strategy is not undermined by individual SmartGrowth partners.</p> <p>In particular, background reports which identify and categorise areas suitable for employment land should be applied in the Draft Strategy based on the technical assessments completed by experts.</p>
		94	5	Katikati Community Board	<p>Smart Growth has identified shortages in industrial land and the need for new industrial zones. The Katikati Business Park is an important part of the solution particularly for light innovative and clean industry. The township has a wealth of small to medium industrial businesses and is a strategic location for more growth. The existing Katikati industrial zone. Willing land owners, a willing developer and a business investor wanting to make this happen. Unfortunately, the consenting process is slow and frustrating for over 20 years. This is a perfect example of how Smart Growth can make a positive difference by endorsing a sensible growth initiative that will deliver economic benefits. A 'make it happen' attitude, a sunrise frame of mind as opposed to a sunset mentality and a sense of urgency will be warmly welcomed. Enabling swift consenting for the Katikati Industrial Zone will inspire investors &amp; developers and will lead to the identification of other suitable land for development. We acknowledge that climate change is real and risks must be mitigated. Waterways, flood prone areas and roading challenges highlight the need for fit for purpose infrastructure. Overcoming challenges and finding solutions is what Katikati does best.</p>
	5: Support	53	18	Bowden, Beth Willard	<p>I accept the requirements and the constraints imposed by legislative and national policy statements and that both SmartGrowth and our Councils must work within these. Especially as we transition between governments and move to a political environment that may well change a number of the settings that underpinned this Strategy, I welcome further discussions and debate beyond the Special Consultative Procedure (see following remarks).</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		63	1	Landsdale Development Ltd	<p>The Future Development Strategy (FDS) within the SmartGrowth Strategy identifies the site as Ohauti South (Western Corridor), with potential for:</p> <ul style="list-style-type: none"><li>• 190 (Dwellings Medium Term 2027-2034); and</li><li>• 280 (Dwellings Long Term 2034-2054)</li></ul> <p>The site provides land and infrastructure to contribute positively to the identified housing shortfall. (addresses Challenge 1, taking into account other challenges). The site has not been identified on the Hazard 'No-Go' (Map 2) or the 'Areas at Risk from Climate Change' (Map 5).</p> <p>Landsdale seeks that the inclusion of Ohauti South in the FDS as a Medium Term Growth Area be retained.</p> <p>The private plan change is actively being progressed, and the developer is committed to delivering much-needed housing (with associated cycling, walking, public transport-capable roading infrastructure, reserves and other services infrastructure) at the earliest opportunity. The current "medium term" timing will enable rezoning, earthworks and subdivision consent processes between 2024 and 2026, with the delivery of the first houses from 2027.</p>
		70	1	Element Imf Ltd	<p>Within the Strategy, TBE Stages 1-3 are recognised as "existing urban areas" and/or "industrial zone", while Stage 4 is identified as a "planned growth area" and is also referred to as the "extension" to the TBE. Land to the south of Stage 4, in the area known as 'Upper Belk Road', is identified as a "potential long-term growth area". We support the identification of these areas as such within the Western Corridor, noting that the Upper Belk Road planned growth area presents the opportunity to incorporate future industrial land-use. This is confirmed in the FDS (page 149), and is thus likewise supported.</p>
		92	1	Murphy, Vincent	<p>Overall, generally support the direction and robust work going in to the FDS.</p>
	6: Population assumptions	42	3	Gordon, Carole	<p>The demographic paradigm shift requires inclusion in the SmartGrowth strategic context as a key driver for achieving integrated policy planning and innovative co-design action on housing, mobility, healthcare and neighbourhoods. It is noted (p21) that the demographics will have a "profound influence on how we plan." It is difficult to find 'how', in the strategic plan.' Perhaps there are too many plans?</p> <p>The Strategy document lacks clear readable population data. Change profiles are necessary to inform a platform for innovative urban planning and wider policy responses to social equity and population structural change:</p> <ul style="list-style-type: none"><li>• High Maori birth-rate, more rangitahi, more whanau connectivity.</li><li>• Responses to increasing poverty, people on low incomes and those of ethnic and ablement diversity.</li><li>• Increasing demand for quality, secure, affordable rental accommodation.</li><li>• Rapid increase of more Elders living longer requiring lifetime homes to independently age-in-place-in-community with dignity, social connectivity and access to affordable healthcare services.</li><li>• Burgeoning growth of unsustainable profit centred retirement villages that create an unhealthy intergenerational separation of Elders from society. The Silver Economy loss to the region is substantial. Trends indicate that end of life care provision will be limited to wealthy clients.</li><li>• There is a growing Elder care crisis to be addressed.</li></ul> <p>These factors will shape the social and economic cultural future of the sub region.</p> <p>It must be emphasised that as a society, we have not met these 'never before in history' population phenomena before. The challenge is now.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		42	4	Gordon, Carole	<p>The strategy reflects a dominant focus on 'growth' and land use. It proffers new places to put houses, roading and infrastructure required. Yet, an analysis of the demographic estimated projections indicates that there will be limited growth in cohorts other than 65-100+ which will see rapid growth to 2048.iii (See graphs) Will the new planned greenfield places suit Elders seeking an affordable right sized home? It is unlikely they would have local access to the essential services they need within their lifetime. A serious market perception check is needed.</p> <p>1 Actions:</p> <p>1.1 Clearly indicate the changing demographic structure in: age cohort graphs, including the population structure of Tangata Whenua, so that everyone in all sectors, including the business community, understands the nature of the remarkable ageing population shift, and can begin to process the implications.</p> <p>1.2 Strengthen housing, transport, health and community social infrastructure sections to reflect higher levels of age and culturally relevant focussed service.</p> <p>1.3 Detail sub-regional strategies necessary to align with the UN Decade for Healthy Ageing goals congruent with both the Government's Healthy Ageing Strategy 2016, Better Later Life Strategy 2019-2034. Further it should reflect the intent of the HUD Policy Brief, The Long Term Implications of our Ageing Population For Our Housing and Urban Futures, 2023.</p>
		42	5	Gordon, Carole	Population data in the Strategy should be disaggregated wherever possible to avoid homogenising cohorts such as 65+. This outmoded practice creates invisibility, influences discourse, and leads to a lack of inclusion in planning perspectives.
		53	25	Bowden, Beth Willard	<p>Can we establish with some clarity just what the projections are? Population growth is variously described within the Strategy - "an envisioned population scenario of 400,000 over the next 50 plus years" (p.12); "projected to reach between 246,100 and 317,500 people in the next 30 years" (p.21). I can see that these are not necessarily incompatible, but the use of two differing time-frames may not assist clear policy formation and implementation.</p> <p>Housing requirements are similarly confusing. The TCC seems to rely on 19,000 dwellings expected of its intensification efforts but there are public pronouncements of 25,000 potentially available in the western corridor (provided a new road is put out there). The Strategy discusses shortfalls in supply but does not actually put forward scenarios as to how many houses would be enough: "These numbers are based on the likely expected population (Stats NZ medium-high projections October, 2022) which generates overall housing demand. The housing demand includes the existing housing shortfalls identified as at July 2022, and the additional 15% and 20% required as the competitiveness margins in the NPS-UD" (footnote, p. 142).</p> <p>Distinctions between urban-intensified housing typologies and rural needs (clusters around transport and service hubs, accomodation for itinerant workers) are adequately addressed.</p> <p>There is also over-much reliance on assumptions that Maori land is an easy source of supply for development. History tells us that is not the case. Once again, the absense of an Implementation and Funding Plan is evident. I would advocate for a significant and seperate Plan to be worked through the Tangata Whenua Forum on the matter.</p>
		64	1	Classic Group	<p>Skepticism Regarding Infill Development Forecasts:</p> <p>Upon reviewing the provided growth forecasts, there is a notable level of skepticism, particularly concerning the projected spike in infill development. The basis upon which these forecasts are made remains unclear, raising concerns about the accuracy and feasibility of the anticipated surge in infill development. We are very skeptical that this will occur which will only make the predicted shortfall worse.</p>
		65	6	Te Puke Economic Development Group	<p>We encourage Smart Growth to be mindful of:-</p> <ul style="list-style-type: none"> <li>• An ageing population</li> <li>• The incredible opportunities that will emerge with the growth of the Maori population</li> <li>• Growth in immigration</li> </ul> <p>Specific planning and swift delivery of housing, transport and accessibility solutions for these demographics must be elevated to high priority.</p>
		67	2	Ford Land Holdings Pty Ltd	<p>FLH requests that the Table on page 147 be amended as follows:</p> <p>a) Te Tumu Dwellings Medium Term (2027-2034); 2,100.</p> <p>b) Te Tumu Dwellings Long Term (2034-2054); 4,000.</p> <p>c) Te Tumu Totals 2024-54; 6,100. This reflects to Te Tumu Structure Planning that has been carried out</p>



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Topic	Issue	Sub ID	Sub Point	Name	Summary
		67	3	Ford Land Holdings Pty Ltd	FLH requests that the Table on page 148 be amended as follows: a) Te Tumu Dwelling Opportunity Post 2054; 2,000. This is based on the opportunity over time for increased residential densities to be achieved.
		67	4	Ford Land Holdings Pty Ltd	FLH requests that the Table on page 148 be amended as follows: a) Te Tumu (Employment Land) Medium Term (2027-2034); 60ha. b) Te Tumu (Employment Land) Medium Term (2034-2054); 0ha.
		68	3	Tumu Kaituna 14 Trust	TK14 requests that the Table on page 147 be amended as follows: a) Te Tumu Dwellings Medium Term (2027-2034); 2,100. b) Te Tumu Dwellings Long Term (2034-2054); 4,000. c) Te Tumu Totals 2024-54; 6,100. This reflects to Te Tumu Structure Planning that has been carried out
		68	4	Tumu Kaituna 14 Trust	TK14 requests that the Table on page 148 be amended as follows: a) Te Tumu Dwelling Opportunity Post 2054; 2,000. This is based on the opportunity over time for increased residential densities to be achieved.
		68	5	Tumu Kaituna 14 Trust	TK14 requests that the Table on page 148 be amended as follows: a) Te Tumu (Employment Land) Medium Term (2027-2034); 60ha. b) Te Tumu (Employment Land) Medium Term (2034-2054); 0ha.
		73	2	Property Council New Zealand	5. Data and Analysis 5.1 Property Council acknowledges the work undertaken to develop residential population growth and housing capacity estimates. While we are comfortable with the modelling as it currently stands, we would note that population growth and housing capacity modelling is not an exact science. There are a wide range of changing variables such as immigration settings or internal migration patterns. It is important to ensure that a flexible approach is taken, that can account for changing variables over time. 5.2 For example, if population growth tracks higher than forecast, it would be important to ensure additional residential land supply over and above what is currently catered for. Furthermore, as SmartGrowth partner councils impose more requirements or overlays on land, such as the Slope Hazard Overlay released in October 2023 by Tauranga City Council, there is risk that this could impact negatively on the housing capacity modelling. 5.3 Property Council acknowledges the work undertaken to develop business and industrial demand and capacity modelling. We note that there has been significant business and industrial land price inflation in recent years, largely as a result of shortages of land supply. This impacts the economic competitiveness of the region and limits our capacity to attract much needed new investment. There are a wide range of variables when it comes to business and industrial modelling which include uncertainty regarding the future of industrial land in the Mount Manganui area or increased demand associated with proposed expansion of the Port of Tauranga. 5.4 Accordingly, Property Council recommends that SmartGrowth ensures a flexible approach to future land supply (residential and business) that accounts for changing variables. This will help maintain competitive land markets across the region and help prevent unintended consequences such as shortages of housing or lack of land for business.
		80	4	Hickson, Paul	I recall some of the parameters I have read in past Smart Growth reports underestimated the growth of the kiwifruit industry. Projections for rural house growth are far too low over the period. I also note that the census is taken before the peak of the kiwifruit season and therefore population counts are lower than peak so planning may be flawed as a result. Of course the same applies to tourist centres like the Mount, Pukehina and Waihi Beach.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		84	7	McMaster, Bill	<p>1.25 The Market Economics report tabled as part of PC33 evidence states that the proposed Council new height and density provisions enable approximately 497,590 more dwellings through PC 33 for the Tauranga area.</p> <p>1.26 The SmartGrowth Housing and Business Capacity Assessment 2021 (HBA) estimated that between 37,000 and 43,000 new homes will need to be built to keep up with demand in the western Bay of Plenty sub-region over the next 30 years (Pg 142). Of this Tauranga is projected to require another 30,000 to 34,000 new houses over the next 30 years.</p> <p>1.27 The table on Pg 143 shows a shortfall in development capacity of 1,620 or 7,930 houses across the sub-region.</p> <p>1.28 TCC's PC 33 is enabling significantly more dwellings than what is currently needed for Tauranga's forecast growth, as identified through the SGS. This means that PC33 is out of sequence with the SGS and must be disputed by the SG partners.</p> <p>1.29 Tauranga City Council's required housing numbers in PC33 are overstated and high density intensification at the Mount is not required to achieve the requisite SGS housing numbers and must be very low priority.</p> <p>1.30 The SGS on pg 143 identifies that TCC has found that its proposed expenditure programme over the 2024-34 period is unsustainably large from a fiscal and delivery perspective. This will require a reduction in the programme for investment to support housing intensification. This has implications for when new development capacity will become available</p> <p>1.31 The table on page 147 outlines the proposed dwelling allocations over the next 30 years to support the connected centres programme. Tauranga City has an allocation of 11,400 to 15,000 dwellings between 2024 to 2054.</p>
		91	13	Sustainable Bop Trust	Why isn't TCC's RER number (19,000 dwellings) being used for the SG Strategy infill / intensification number (that'd result in 50% infill / intensification)?
		91	24	Sustainable Bop Trust	<p>14. Does the Strategy fully account for the projected large increases in 65+ age group?</p> <p>15. Will it meet the needs of that fastest growing age group and the different needs of 65-74, 75-84, and 85+ year olds?</p>
		91	5	Sustainable Bop Trust	<p>Strategic Demographic Issues</p> <p>We are not convinced the Draft Strategy has fully and adequately considered three vitally important strategic issues:</p> <ul style="list-style-type: none"> <li>• High immigration growth - this has consistently been higher than forecast at a national level and that has been mirrored locally, resulting in under-provision of infrastructure</li> <li>• Our ageing population - this does not seem to have been fully considered in regards to provision of health facilities, transport networks, and other social infrastructure</li> <li>• Growing Maori youth population - we are not sure if this has been adequately provided for in regards to specific housing needs in relation to workplaces`</li> </ul> <p>The punchline is obvious: we need to design our city and sub-region to meet the needs of this rapidly aging population, including the large number of immigrants coming from outside the region.</p>
		94	6	Katikati Community Board	<p>We encourage Smart Growth to be mindful of:-</p> <ul style="list-style-type: none"> <li>• An ageing population</li> <li>• The incredible opportunities that will emerge with the growth in eco-agriculture</li> <li>• Growth in immigration</li> </ul> <p>Specific planning and swift delivery of housing, transport and accessibility solutions for these demographics must be elevated to high priority.</p>
	7: Settlement pattern	42	17	Gordon, Carole	3.3 Give the East the Villages they desire not an UFTI constructed City.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		44	3	Conlon, Bruce Nicholas	Please see the previous where Welcome bay, does see to continue to be forgotten in plans, and its such a beautiful and culturally rich area.  Also, infrastructure like a supermarket, shopping area, as the Welcome Bay village really is far too small for the populations needs, and travel to the city is congested. Environmentally the amount we have to drive each day as we don't have the services, multiplied by the population must be having a detrimental impact.
		47	4	Fitter, Julian Richmond	Paengaroa should be a key focus for development along with Te Puke, it already has the necessary Road and Rail infrastructure.
		59	15	Ministry Of Education	In order to address the shortfall, the draft Strategy outlines the need to rely on bringing forward land in the east and west and achieve a greater level of intensification. The draft Strategy also notes that the Eastern Centre may be required earlier and at a greater scale if development capacity is not provided as anticipated in other identified areas. Maps 1-12, 15-17 and 19 show the Eastern Centre, Te Puna and the wider Tauranga Western Corridor as 'potential long-term growth areas'. However, on Map 18 - Future Development Strategy Staging Map - the Eastern Centre is identified as a confirmed long-term growth area. As a result, there is some confusion as to what the preferred 30-year growth pattern is for the sub-region. The draft Strategy needs to be clearer about the status of the Eastern Centre, particularly if the Tauranga Western Corridor SDP is confirmed. Relief sought: - Clarify the timing and status of the Eastern Centre. - Clarify whether both the full Tauranga Western Corridor SDP area (including the potential growth areas) and the Eastern Centre would be needed within the 30-year timeframe if the TWC SDP is confirmed. - Staging or relative priority of growth in the corridors would be helpful, and this should form part of the Implementation and Funding Plan.
		65	4	Te Puke Economic Development Group	We support the plan to explore and potentially develop in the longer term a new 15000+ settlement east of the Te Puke township. Concurrent with this initiative it is important that we stimulate immediate residential growth in the Te Puke township, Paengaroa and Pongakawa. An assessment of Maori land suitable for housing solutions in Maketu and an extension of coastal settlements past Pukehina further east should also be explored. These settlements are well established and are central to our economic drivers. It is not a case of one or the other (new 15000+ settlement or growth of existing settlements). We need housing now to match economic growth. We need to progress both initiatives. Central government support is important for success. Timing is everything and with a change of Government the time is now. The incoming Government are very clear on 3 points:- a. The MDRS or Sausage flat law designed to prevent urban sprawl will be gone in 100 days. They have a preference for greater focus on greenfield developments which will allow conversion of farmland to new residential settlements. b. Repealing three waters reform and a return to local management is positive. c. RMA reform will remove red tape and hindrance to progress. Additionally, decentralisation will encourage localism and a 'can do' attitude. Distant bureaucrats with no local knowledge making decisions from afar does little for sensible progress. This is a terrific opportunity for Smart Growth to impress upon central government the need for access to infrastructure funding. Smart Growth must endorse a program for the Te Puke region to deliver new housing in the township and in the rural settlements we have identified. With green lights instead of red and clearly defined pathways for swift progress, land owners and housing developers will act quickly. It should also be noted that this can be a sensible and balanced program of rural land conversion in sync with economic growth.
		67	1	Ford Land Holdings Pty Ltd	As noted above, through the extensive research, investigation and planning carried out on Te Tumu the proposed urbanisation of Te Tumu addresses and satisfies the key objectives and outcomes identified and sought in the SmartGrowth Strategy - see above; accordingly FLH requests that this section of the FDS contain a statement that SmartGrowth and TCC will commit to work with FLH and the Te Tumu Landowners to progress a Plan Change for the Te Tumu Urban Growth Management Area so it can be notified before the end of 2024.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		68	1	Tumu Kaituna 14 Trust	<p>The Tumu Kaituna 14 Trust (TK14) have 240ha of land in the Papamoa East Te Tumu Growth Management Area and have been actively involved with the SmartGrowth Partners with regard to the urbanisation of Te Tumu for over 20 years since SmartGrowth started in 2000. Te Tumu was identified as a Growth Management Area in the original SmartGrowth Strategy that was published in 2004; since that time Te Tumu was confirmed as a Growth Management Area in the:</p> <ol style="list-style-type: none"> <li>1. Bay of Plenty Regional Policy Statement - 2007.</li> <li>2. Tauranga City Plan as a Future Urban Zone - 2009.</li> <li>3. SmartGrowth Strategy 2013.</li> <li>4. Urban Form and Transport Initiative 2020.</li> <li>5. Numerous publications linked to or associated with the above publications.</li> </ol> <p>Over the last 20+ years substantive amounts of research, investigation and planning have been carried out for the urbanisation of Te Tumu by Tauranga City Council (TCC) with the support of the SmartGrowth Partnership. This work has confirmed that Te Tumu can be urbanised and provide much needed housing and employment land for the Bay of Plenty. More recently an extensive consultation process was undertaken by the TK14 Trustees in 2022 with the TK14 Owners, with one of the key outcomes being that a resolution was adopted for representatives of the TK14 Trust to negotiate with TCC on suitable mechanisms to provide infrastructure through the TK14 Block which would support the urban development of the entire Te Tumu urban growth area. The majority of Trust owners who engaged in the 2022 engagement process, supported these negotiations proceeding. The negotiations are substantially advanced.</p> <p>In the context of the above background TK14 were very surprised and disappointed that the Te Tumu Development Timeframe in the Future Development Strategy (FDS) has been pushed out to the Long Term 2034-2054 period.</p> <p>Key Submission Points</p> <p>A. TK14 requests that the Te Tumu Development Timeframe in the FDS is moved to the Medium Term 2027-2034 period noting that a Plan Change for Te Tumu is proposed to be notified in 2024.</p> <p>B. TK14 requests that the Infrastructure for Te Tumu as detailed in the FDS and in the submissions below is moved to the Medium Term 2027-2034 period.</p> <p>C. TK14 requests that a full Project Plan and Resourcing Plan be prepared for the FDS; and Informed by the Project Plan and Resourcing Plan, that a SmartGrowth / FDS Implementation Office be established with adequate funding and resources to deliver the FDS.</p>
		68	2	Tumu Kaituna 14 Trust	<p>As noted above, through the extensive research, investigation and planning carried out on Te Tumu the proposed urbanisation of Te Tumu addresses and satisfies the key objectives and outcomes identified and sought in the SmartGrowth Strategy - see above; accordingly TK14 requests that this section of the FDS contain a statement that SmartGrowth and TCC will commit to work with TK14 and the Te Tumu Landowners to progress a Plan Change for the Te Tumu Urban Growth Management Area so it can be notified before the end of 2024.</p>
		69	4	Pirirakau Tribal Authority - Incorporated	<p>15. Pirirakau seeks an 'off limit' layer of Te Puna and Huharua involving Whakamarama also as an agreed consequence of enabling Omokoroa full urbanisation. Stop developing the Pirirakau rohe to retain rural character for ecological benefit offsetting the urbanisation of the wider Tauranga growth cells and Omokoroa. Honour the promises that were made that inform this.</p>
		72	16	Nga Potiki a Tamapahore Trust	<p>Map 3B includes general areas for Maori land development which NPAT supports, however it considers that Maori owned land, that is not Maori land as defined by Te Ture Whenua, could also be considered as a Maori development focus area. Adopt Map 3 as notified, but include the land located to the south of Tara Road legally described as Section 19 SO 489379, Sections 25, 26 and 27 SO 457368 as a potential focus area.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		72	20	Nga Potiki a Tamapahore Trust	Amend the FDS map 18 to include Section 19 SO 489379, Sections 25, 26 and 27 SO 457368 as staged growth areas either for the short term or medium term.
		73	4	Property Council New Zealand	6.2 In terms of the proposed Key Growth Areas, while Property Council supports the intent behind classifying the Eastern Centre as a Key Growth Area, we are concerned that there appears to not have been sufficient preparatory work undertaken to evaluate and lay the groundwork for future urban development in the area. Additionally, we would also suggest that SmartGrowth should further investigate the development potential of Te Puna area and the wider northern corridor, for both residential and business developments.
		78	2	Clear The Air & Tauranga Moana Fumigant Group	14. There is a very real risk that intensive residential development enabled by PC 33 will increase exposure of people to unacceptable health hazards associated with the polluted airshed at Mount Maunganui. This also affects Pillans Point and Mount Maunganui.
		79	0	Upper Ohauiti Landowners Group	seeks that SmartGrowth identifies in the maps potential lifestyle areas, including the Upper Ohauiti Area (that being the land to the south of the current TCC boundary up to Rowe and Neewood Roads. The maps depict industrial and urban areas, but disregard rural residential areas.
		79	0	Upper Ohauiti Landowners Group	Seeks that the Master Plan (attached) is considered and utilised as a base for the provision of lifestyle zoning in Upper Ohauiti as part of the SmartGrowth Strategy and subsequent WBOPDC Planning.
		79	0	Upper Ohauiti Landowners Group	38. There is an overall shortfall of housing in the sub-region of Western Bay of Plenty. Additional housing in urban areas will take considerable infrastructure to activate. This land is able to be developed with relatively minor infrastructure upgrades. Further work is required to understand the detail, however if the land is included in the Smartgroth strategy as a growth area this gives confidence to the landowners to continue to invest, and also signals to the Councils to consider it in their growth and infrastructure plans. 39. We are in a fortunate, but temporary situation where the major land owners are all in alignment as to seeing the land re-zoned to facilitate development. This enables the relatively rapid creation of 400 - 500+ homes and community infrastructure without requiring major upgrades to infrastructure. 40. Residential Development of the submission area does not affect horticulture or large areas of versatile soils, unlike most of the other areas focused on by Smartgrowth. 41. 3 waters services are able to be managed onsite or by simple upgrades to existing services 42. There is an important opportunity to provide an east-west roading link between Welcome Bay and Oropi that warrants further investigation. Otherwise roading upgrades are straightforward. 43. Additional vehicle traffic would be imposed on the local roading network, however this would occur overtime allowing upgrades to be investigated and made. 44. The ecological enhancement, already commenced by the landowners provides the opportunity for the community to establish an ecological precinct, or 'village' in an ecologically important part of the city. 45. Practically, it may be easier for the local government boundary to shift to incorporate the submitters land, however this seems academic as there are very few issues which require cross boundary invovlement.
		80	2	Hickson, Paul	Qualified support. Whilst I agree with the basic thrust of SmartGrowth, I don't think it has addressed the prospective growth in the region from Te Puke to Otamarakau/Matata in enough depth. Thus I think it is dangerous to draw firm lines around areas for 50 years at this stage. If the Rangiuru Business Plan proceeds then people will also want to live east of it as well as west. The coastal aspect and existing social infrastructure at Pongakawa make it an attractive place. Also the escalating coastal land prices at the Mount and Papamoa will make people search for more affordable coastal land.  1. further investigation of the Te Puke - Otamarakau / Matata area. 2. Rural Structure Plans should make specific reference to areas noted. 3. Final outcomes should have flexibility (it is a 50 year plan) 4. Cluster development could be a model to follow for the area Staff Recommendation: Reject

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		80	3	Hickson, Paul	<p>THE EAST</p> <p>SmartGrowth has concentrated to a large degree or Tauranga and growth of the city, including Tauriko whilst the East has been largely ignored in terms of residential growth. This is poor planning as the East offers:</p> <p>Kiwifruit industry - we are the international leaders in this industry and over half the growth is happening in Te Puke and areas east of Te Puke. This requires a growing labour force and while large accommodation sites like Kiwi Corral and Bay Gold exist, encouraging a permanent work force who own their houses and feel part of a community should be the long term aim. Therefore rural villages should be allowed to evolve at Paengaroa and other places.</p> <p>Coastal living - many people enjoy coastal living. This is a fifty year plan so there are places from Pukehina to the East like Otamarakau and Rogers Road that are elevated and would offer great opportunity for small settlements.</p> <p>In considering the above it should be noted that the East offers:</p> <p>Employment - growing work force in kiwifruit and Rangiuru business park, in addition to normal growth.</p> <p>Social Infrastructure - schools both rural and in Te Puke, sports facilities at ED, Paengaroa, action centre at Pongakawa, swimming pools and sports fields at local schools. Te Puke - offers community arts, culture and sports clubs serving the whole district.</p> <p>Transport network - Rail from Kawerau and TEL in addition to other roading.</p> <p>Water - concern in the East about water flowing out of the catchment so this should cease and water kept for use by industries in the East.</p> <p>I am aware that Smart Growth has future plans for a city in the East in the Paengaroa aor Business Park area. However this should not prevent natural growth in the rural housing and settlements to support the growing workforce.</p>
		81	10	Urban Task Force	<p>There is a need to deliver housing and business land in n timely and efficient manner as Tauranga is now the worst performing Tier 1 Council under the NPS-UD in terms of housing supply and housing affordability.</p> <p>The Smartgrowth Strategy must adopt a more enabling and fluid policy position to enable the delivery of residential and employment land based on a corridor approach. Key actions are required such as the ability to efficiently deliver and service land with respect to infrastructure. Sound engineering solutions which enable land to be developed should be applied and feasibility assessments must be required to ensure that ultimately the development of land is feasible in order to deliver housing. These are all actions that require inclusion in the Strategy.</p> <p>The "lead time to Development" identified on page 144 of the Strategy needs actions included in the Strategy to support a reduction in the development timeframes. Much of the delay is due to poor Council Plan Change and District/Regional consent processes. The need for urgent action and collaboration implicit in the Draft Strategy is not currently translated into delivery. Further actions are needed to require Smartgrowth Partners to sufficiently resource processes, and to offer fast track Plan Change and premium consent processing services. These Actions will greatly assist with the supply of land from Priority Development Areas identified in the Strategy.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		81	11	Urban Task Force	Based on feedback from Urban Taskforce members, there are a number of amendments required to the short, medium and long term residential growth allocations table on page 147 of the Strategy (and associated changes to timing of infrastructure provision tables and associated staging maps) as follows: 1. Move Te Tumu 4,200 dwellings to 2027-2034, and 4,200 dwellings to 2034-2054 2. Move Tauriko West 2,000 dwellings to 2027-2034 and 1800 dwellings to 2034-2054 3. Move Keenan Road 1,000 dwellings to 2027-2034. 4. Add Wairakei south 2000 Dwellings to 2027-2034 and 2000 dwellings to 2034-2054
		81	2	Urban Task Force	The current reality for growth in the wider Tauranga area is that residential growth is currently constrained, with Papamoa nearly being at capacity which leaves only intensification, Omokoroa and Te Puke to provide the necessary housing supply in the short term. The Urban Taskforce considers that the Smartgrowth Partners need to ensure and adopt a much more flexible approach to ensuring there is future land supply available to provide for the growth needs of Tauranga. The approach of identifying a narrow range of sites for future growth has been problematic particularly where sites are constrained in terms of infrastructure or where there is the inability to deliver business and residential land in a timely and efficient manner.
		81	4	Urban Task Force	The Future Development Strategy (FDS) is a joint strategy within the overall urban growth policy system and is a significant strategy. It is the primary long-term strategy upon which all large-scale long-term decisions and investments are based, by both the public and private sector. The FDS effectively replaces the substantive content of the Regional Policy Statements Urban Growth Policy. The FDS must be a very stable policy instrument. It should be implicit that where an area is identified for growth and the SmartGrowth Partners have agreed on its overall appropriateness (including the tradeoffs that have been made), that growth options have properly considered costs and impacts. Feasibility is critically important and further policies are required to be included in the strategy which require the economic feasibility of sites to be considered as a key consideration. For example, high value kiwifruit land to the east of Paengaroa (at the eastern end of the Eastern Corridor and beyond) is unlikely to be feasible for residential or employment purposes due to high land cost. Further policies must be incorporated in relation to the need for feasibility to be fully understood.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		83	13	Bell Road Limited Partnership	<p>Wairakei South (previously referred to as Ottawa 2) was identified by Aurecon as having a yield of 600-650ha (assuming 70% nett developable yield from the gross site area due to the TEL through the spine and other land quality constraints including stormwater management). The area identified for business land is shown in Appendix (i).</p> <p>Bell Road LP has been liaising with the three Council's through its planning processes in relation to the Wairakei South land. Wairakei South has not properly been identified within the Draft Strategy. No provision has been made for Wairakei South in the short, medium and long-term table of housing supply assessment.</p> <p>Below is a summary of the work completed to date and the benefits of including the Bell Road LP site in the Strategy:</p> <ul style="list-style-type: none"><li>• The initial development focus is on employment and industrial zoning, but otherwise is a mixed-use approach.</li><li>• Preliminary flood modelling and mitigation has been completed by DHI and Lysaght Consultants.</li><li>• Geotechnical, Ground Engineering and Contamination assessments have been completed by Golders, LDE and Engeo Consultants.</li><li>• Wairakei South can feasibly be developed and relative to other investigation land areas, is superior in most development criteria. The assessment of the land in the Aurecon Industrial Land Assessment confirms this position also. Further detail is outlined in the table below.</li><li>• Bell Road LP has a clear intention to develop.</li></ul>
		83	14	Bell Road Limited Partnership	<p>Bell Road LP seeks that Wairakei South be included in the Business Employment Land assessment in the strategy on page 149 through the following changes.</p> <ul style="list-style-type: none"><li>• Include 100ha of employment land in the 2027-2034 (medium term) and 45ha of employment land in the 2034-2054 (long term) planning periods.</li></ul> <p>Bell Road LP seeks that as well as employment land, provision for dwellings should be incorporated in the short, medium and long term residential growth allocations table on page 147 of the strategy as follows:</p> <ul style="list-style-type: none"><li>• Add Wairakei South 2,000 dwellings to 2027-2034, and 2000 dwellings to 2034-2054</li></ul> <p>The Future Development Strategy Staging Map (Map 18) on page 154 should also be updated to provide for Wairakei South (and associated changes necessary to timing of infrastructure provision tables and associated staging maps).</p>
		83	6	Bell Road Limited Partnership	<p>Similarly the feasibility (both in terms of infrastructure provision, land cost and the NPS-Highly Productive Land assessment) of residential land of the Eastern corridor needs to be properly assessed, particularly given that this is high value kiwifruit land.</p> <p>Technical assessment and the public submission and review process is the mechanism by which areas should be identified or included within the Draft Strategy, through a clear and transparent process.</p>



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		83	0	Bell Road Limited Partnership	Based on the evidence of Peter Moodie and Ben O'Loughlin, I am satisfied that natural hazard, flooding, and geotechnical constraints associated with the site can be appropriately managed through relatively standard engineering" responses to the site. As identified in the evidence of Ben O'Loughlin, development of the land can occur in accordance with accepted engineering solutions and filling will enable the land to be above the 100-year flood level and clear of any Tsunami risk. 7.2 The evidence engineering and natural hazards evidence addresses the two outstanding points that were raised in the Phizacklea Report, which indicated that the submitter would need to provide in support of the site being included as a Priority Development Area in the SmartGrowth Strategy. 7.3 Although large areas are required to be set aside for stormwater management, I consider that this is a significant positive benefit of developing Wairakei South given that 99% of the wetlands within the Kaituna Catchment have been lost as a result of being drained and converted into farms. This is entirely consistent with Te Mana O Te Wai. 7.4 The sites attributes such as its proximity to the eastern corridor, the ability to gain access via the existing interchange, its connection to Te Puke and the TEL and the fact that it is a logical extension to the existing Wairakei settlement are all in my view positive reasons to include the site as an identified future development area. As noted in the evidence of Nathan York, one particular advantage of the site is the proven feasibility of being able to develop the site, given the low cost of the land. The feasibility of other land identified in the Strategy is questionable. 7.5 In my opinion, the inclusion of the land within the SmartGrowth Strategy as a future development area will further assist the subregion in achieving both residential and business land shortfalls which are not being met in either the short, medium or long-term scenarios.
		83	0	Bell Road Limited Partnership	Geotechnical investigations completed to date confirm that the site is subject to a number of geotechnical constraints and geohazards including consolidation settlement, liquefaction, embankment stability, and tsunamis. Based on the results of the preliminary assessment completed under my guidance, I consider that there are a number of appropriate, accepted and viable engineering solutions available to mitigate and / or manage the identified geotechnical constraints to accommodate the proposed future residential and employment zone land development. This conclusion is subject to the completion of further geotechnical investigation and engineering involvement through all stages of design, construction observation and certification of landform, buildings and infrastructure. A Natural Hazards risk assessment will be required in accordance with the Bay of Plenty Regional Council Regional Policy Statement.
		83	0	Bell Road Limited Partnership	Given the significant the shortfall of land in the sub-region for both future residential and industrial land, the SmartGrowth Draft Strategy should not be as prescriptive when identifying "preferred potential locations" in planning for business land demand needs Wairakei South Urban Growth Area for the sub-region. Limiting your future land development options, as done in the past, has already placed the sub-region under huge land supply deficit stress. 54. SmartGrowth needs to mindful that some of the sub-region's strategic transport corridor locations, e.g. western and northern corridors are subject to huge infrastructure costs, financing, design & consenting processes and/or actual construction. These elements will typically not be addressed in a timely manner, and therefore impacting on the likelihood (or unlikelihood) to unlock business land in these areas over a considered period of time. 55. SmartGrowth should continue to focus on urban development around known centres and existing transport corridors that are properly operational, therefore providing strong containment of transport movements and reduction across the wider regional transport networks. 56. The Wairakei South Urban Growth Area should be included as a future growth area for the sub-region, to deliver much needed employment and residential land. 57. If SmartGrowth continues with a preferred location list approach, then the Site needs to be recognised as one of the preferred potential locations outlined in the SmartGrowth Draft Strategy (page 149), from which further detailed assessment can be undertaken. 58. The site also qualifies as a Priority Development Area under the FDS for the sub-region.
		83	0	Bell Road Limited Partnership	On the basis of my preliminary assessment, potential solutions exist for urban development of the sites in terms of earthworks, flooding, stormwater, wastewater and water servicing. 9.2 I have reviewed the SmartGrowth Industrial Land Study reports, and in my opinion, many of the issues raised in the short-listing process have potential solutions, and the sites should therefore not be excluded from further investigation or short-listing.
		84	2	McMaster, Bill	1.6 This submission seeks that the SmartGrowth partners communicate with Tauranga City Council, as a key SmartGrowth partner, seeking TCC to remove the high density residential proposals from the Mount Maunganui North area which are included in TCC Plan Change 33 until the SmartGrowth partners have had an opportunity to assess what this development will do in terms of providing excess housing numbers in the Western Bay of Plenty sub-region and assess the adverse impacts of this proposed development on Western Bay of Plenty infrastructure implementation planning (and assessed in the SGS Implementation and Funding Plan).
		91	7	Sustainable Bop Trust	How Realistic is the Spatial Plan?

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		91	8	Sustainable Bop Trust	Eastern v Western v Northern Corridors
		92	2	Murphy, Vincent	<ul style="list-style-type: none"> <li>• Would seek some clarity of direction on the FDS dealing with 'unanticipated' or 'out of sequence' development.</li> <li>o Could the key principles of the 'Connected Centres', along with other factors such as size, accessibility to transport networks, types of development to be enabled etc, be used in assessing the merits of future 'unanticipated' development that does not fit neatly with areas indicated as being planned or potential growth areas?</li> <li>• Would seek some clarity on the geographic extent to which the FDS applies. There are several diagrams in the draft consultation package that could be use to argue different precise locations. The strategic corridors are not reflected on staging of business and housing land, for example, yet many facts and issues are corridor-based.</li> <li>• For example, I am aware of distinct housing pressure in the Pongakawa area, immediately east of Paengaroa, owing to mass (thousands of hectares) recent conversions from dry/dairy farming to more employee-intensive horticultural orchards. This occurring in tandem with TEL and Rangiuru Business Park coming online. The need for further development in/around Pongakawa is touched on in places, but is silent on certain diagrams. I am keen to know how the FDS intends to deal with this and other unanticipated development opportunities that may arise across the life of the FDS.</li> <li>• Seek further consolidation of Tauranga City as a whole by way of broadly identifying the potential to wrap around Welcome Bay/Kairua to connect to Papamoa. I am aware developers have purchased tracts of land on the southern side of TEL (between TEL and Bell Road, Papamoa East), and this could be the catalyst for consolidating further the urban extent of Tauranga back towards the rest of Tauranga, pivoting away from sprawling further along the coast than what is already planned/allowed for. Appreciate this is heavily constrained as land of importance to tangata whenua, as well as varying hazard constraints, however the potential for exploring and realising development in places in this area should be broadly provided for, in my opinion.</li> </ul>
		92	0	Murphy, Vincent	Drawing upon the commentary above, it is firstly requested that Pongakawa be acknowledged as a location in-principle where some growth could occur to respond to distinct demand in that location, on whichever plan is to be the actual spatial plan. This could be reflected by use of the 'Potential Long-Term Growth Area' overlay indicated on the spatial plans to-date. See extract below, with green highlight for ease of discernment.
		92	0	Murphy, Vincent	Secondly, it is requested that consideration be given to the potential for signalling growth in a manner to consolidate Tauranga City further. I support the focus on brownfield development within existing urban areas, and acknowledge the widespread constraints and challenges beyond the current extent of Tauranga City that have been considered by the strategy work to-date. An opportune area where this appears to present itself is Papamoa (west of TEL) and back towards Welcome Bay.
		94	3	Katikati Community Board	It is critical that all of our communities have voice and local knowledge is listened to. For many years, a Strategic Partners Forum was successful. It afforded selected interest groups the opportunity to share local aspirations and knowledge, needs based assessments and well thought out ideas. The termination of the Forum was very disappointing and has resulted in a disconnection to industry sectors, communities and local knowledge. We are fully aware that Smart Growth is a planning framework only and approval and implementation processes for growth initiatives sit with the territorial authorities and central government. In our view, the Smart Growth strategy must be connected to communities and interest groups and their local knowledge. We urge you to re-establish the strategic partners forum and to listen to an abundance of local knowledge and ideas that will be invaluable in making sure we achieve the positive 5S's - Strategic, Sustainable, Serviced, Successful and Satisfied.
		94	4	Katikati Community Board	We support the plan to explore and potentially develop in the longer term a new 500+ settlement west of the Katikati township. In planning this development we must be mindful of the impact of rising sea levels due to climate change and the potential of a tsunami. It is better to plan correctly today rather than a managed retreat is say 50 or 100 years time." "This is a terrific opportunity for Smart Growth to impress upon central government the need for access to infrastructure funding. Smart Growth must establish a program for the Katikati region to deliver new housing in the township and in the rural settlements we have identified. With green lights instead of red and clearly defined pathways for swift progress, land owners and housing developers will act quickly. It should also be noted that this can be a sensible and balanced program of rural land conversion in sync with economic growth.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-13: General	1: Support	15	3	Kenyon-Slade, M	The whole development proposal seems a commendable undertaking however it is clear world wide in countless examples that the acronym "No parking, No Customers, No Business! Is very apt.
		22	4	Van De Weyer, Callum	Very nice plan.
		38	1	Smith, Michael Geoffrey	Yes very good overall.
		48	5	Tauranga Business Chamber	We understand that this plan will inform future council planning processes such as city plans, social infrastructure planning, transport planning, local plans, and the annual plan and long-term plan. However, some local stakeholder groups may see this strategy as having more legal status. We're not focusing on the detail - this will happen through the appropriate processes. As a joint planning and directional tool, we support the overall direction of this document as it provides some direction to business' longer-term planning.
		59	1	Ministry Of Education	<p>The Ministry thanks the Smart Growth partnership for the opportunity to make a submission on the draft Strategy. The Ministry has valued the opportunity afforded by the Smart Growth partnership to be involved in the development of the draft Strategy.</p> <p>The Ministry looks forward to continuing to work with the Smart Growth partners in the development of the Implementation Plan for the draft FDS, subsequent structure plans, and any future Regional Spatial Strategy.</p> <p>The purpose of our submission is to broadly support the draft Strategy and FDS and to seek clarification on a number of matters.</p>
		66	2	Golden Bay, A Division Of Fletcher Concrete &	GB generally supports the SGS overall vision and the four well-being objectives for the western Bay of Plenty sub-region growth over the next 30 years
		72	1	Nga Potiki a Tamapahore Trust	NPaTT generally supports the proposed Environmental, Cultural, Social & Economic Objectives. Adopt the Objectives as notified.
		72	6	Nga Potiki a Tamapahore Trust	NPaTT support the following opportunities relating to growth, the natural environment, cultural identity, and the economy. Adopt the listed opportunities as notified.
		73	7	Property Council New Zealand	8.1 Property Council broadly supports the direction of the draft SmartGrowth Strategy 2023-2073.
		75	1	Andrews, Julie	I am pleased to have the opportunity to submit on the Smartgrowth Strategy. I support the vision and objectives of the Strategy. I also largely agree with the transformational shifts identified by the Strategy, in particular homes for everyone, emissions reduction, restoring and enhancing ecosystems and changing the model for growth. I do not necessarily agree with the proposed "how" which is incorporated into transformational shifts 8.3 and 8.6 in the Statement of Proposal.
		81	1	Urban Task Force	<p>The Urban Taskforce supports the SmartGrowth Strategy and considers that it is critically important that the Council's and other partners work in a more aligned manner to plan for the future of the subregion. The Smartgrowth Strategy must provide a guiding framework to deliver employment and housing and assist to resolve the significant crisis in terms of business and residential land supply.</p> <p>The Strategy needs to better recognise the critical need for Smartgrowth to work more closely and collaboratively with the development community to resolve the current sub-regional residential and business land supply crisis.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		84	1	Mcmaster, Bill	1.4 Overall I applaud the SmartGrowth partners in producing a thorough, informative and well-presented Strategy that will serve the sub-region well over the next 50 years. 1.5 I support the Future Development Strategy and the overall implementation and funding plan.
		84	3	Mcmaster, Bill	1.7 I strongly support the SmartGrowth Strategy (SGS) as the pre-eminent growth management strategy for the Western Bay of Plenty sub-region. 1.8 I support the fact that the SmartGrowth (SG) partners have collectively produced a 30 year Strategy that sets the strategic vision and direction for the growth and development of the sub-region. This shows real leadership and a willingness of the partners to agree a plan for future growth. 1.9 I support the integration of land use and infrastructure within the SGS. 1.10 I support the Vision of the SGS "Western Bay - a great place to live, learn, work and play". 1.11 I support the four well-beings and subsequent objectives of Environmental, Cultural, Social and economic. 1.12 The SGS proposes 6 transformational shifts for change which I support. The first shift seeks 'Homes for Everyone' and it is around this shift my submission is based.
		90	1	Bluehaven Group	We support the fundamental intent of SmartGrowth Strategy 2023-2073 (SmartGrowth) which align closely with the long-term development aspirations for the planned Wairakei sub-regional centre (The Sands), the development of the surrounding Wairakei community, including development in Bell Road for industrial/employment land activities.
	2: Oppose	4	1	Feisst, Doug	I cannot believe you paid someone to write 180 pages of dribble. No wonder the National party said that if they get into government there will be a slash and burn of consultants who dream up this crap. Would the average citizen read through all 180 pages and think wow, the council is certainly heading in the right direction. Can someone please write down what the council aims to do in the next 12 months, the cost of whatever is going to be done and who is paying, no use saying it's in the 15 year plan cause you wont be around then.
		4	2	Feisst, Doug	Get some local business people on board to give some direction. I thought one of the major concerns would be sorting out down town Tauranga. Its like a ghetto.
		5	1	Goodley, Wayne	Growth is not in anyway a contributing factor in sustaining life style and most especially our natural environment. Our focus should be one of mindfulness of NOW . Our plan should be to address the issues of a small but beautiful region and city NOT GROWTH. If we cannot fix our today issues we most certainly will not solve them with growth and predictable costs both economic, enviornmental AND life style.
		6	8	N/A, Linda	I don't think the Council is for the people it is supposed to be representing
		8	4	Goodall, Andrew David	By the current state of our roading and infrastruture this group has proven they are are waste of time and ratepayers money. Consider disbanding please. You state you didntknow about the population increases yet pushed (advertised) the subdivisions at the lakes, Omokorao and Papamoa but nothing was done to improve the roading, if anything it has gone backwards. Remove all tolls on our roads and get fibre into more rural areas. Get proper intersections now at Omokorao and Tauriko/Cambridge Rd. Remove Tolls. Get Tauranga back to democracy.
		17	7	Pirere, Tania	DON'T LET FORGERIES AND TE AWARA TAKE OVER MAKETU
		21	1	Wilson-Jenks, Wendy Ann	I don't feel confident at all in your plan, unsmart growth!! Living in Omokorao it is painfully obvious that the infrastructure is unable to cope with the housing that is already under construction that you have given i.e. roading and other facilities. Why don't you concentrate on your core council duties such as roading and infrastructure - since when did it become your core business to build housing for people who have not provided for their own future??
		28	3	Thorpe, Andrew	Growth is synonymous with, at best, increased unsustainable demand on ecosystem services and at worst, environmental destruction. While except that at a local level, growth is inevitable in Tauranga, we must cease to portray growth as in any way positive. It is only a cost, both to the current population and to future generations.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		40	3	Buhrs, Nicole	The kind of development that Smart Growth Strategy is proposing is money driven, not people driven. That is what is wrong. I also can't believe that it talks about more roads for more cars. Even if people get more hybrid cars and EVs, if they still use their cars to move around, more roads and carparks will be needed as the population increases. More people need to live in the city centre. The main shopping streets like Devonport Rd and Grey St could be rebuilt with at least 3 storey buildings with 2 storey apartments on top of shops. That would make a vibrant and revitalised city centre and provide more houses.
		41	1	Mollison, Margaret Helen	We have lived in Tauranga for over 20 years, and in that time, it appears that development has been led by developers in an ad hoc fashion. Clearly, a greenfield growth model is the modus operandi, with little thought for sustainability, long term planning, integrated public transport and community wellbeing, but would seem to be the easiest route for maximum profits. For a sustainable future, for a functional and well-planned city that stops spreading onto arable land and meets the needs of its inhabitants over the next 30 years, this pattern needs to stop. The council needs to take the lead in all future development so developers are required to conform to established guidelines set down by the council in a consistent, integrated, and planned process. We need time to do this well and we need urban planning that is consistent with this vision. In other words, not the tail wagging the dog, but the other way around.
		41	2	Mollison, Margaret Helen	There is confusion around several documents outlining future plans for the region and the intensification that is intended eg Smartgrowth, UFTI, the Transport System Plan. It would be good to rationalise these documents into a united framework with consistent figures. This would be a good start for future planning.  We need robust integrated assessments with enough time for thorough public consultation, well informed urban planning, geotechnical analysis, a clear review of transportation options, with acknowledgment of Papatuanuku, using up to date best practice. A suggested framework for this is sustainability and a good quality of life for all.
		42	18	Gordon, Carole	The draft strategy does not inspire people to take part in shaping environments for a sustainable future. More roads to more houses without highly engaged communities misses the demographically aligned place-making environment that is vital to secure economies, the social contract and social cohesion as a cornerstone to the longevity dividend and wellbeing for all.
		42	19	Gordon, Carole	No I do not feel confident. It is a big task - planning so far ahead is unrealistic * My philosophical view is that more population detail is required to focus the strategic parameters. * It is vital that we plan for who our people are and for the environment. We do know who our people will be - this should guide the urban footprint or built environment to create suitable liveable communities, A different view shaft from Connected Centres which is actually roads! * The assumed 'growth' scenario is unrealistic given global population ageing, workforce decline and increasing geo-political tensions.
		42	22	Gordon, Carole	Growth is unsustainable - rapid urban growth creates poverty.New Zealand urban growth story tells us that this is so. Please initiate discussion on intensification urban planning models such as the Madrid square, Please include a tree planting strategic plan - one house = one tree.
		44	1	Conlon, Bruce Nicholas	It seems that welcome bay is still the "Forgotten Suburb"
		45	4	Liddell, Alan Alexander	I used to come into town from Bethlehem for lunch or breakfast regularly. Now I never do. I used to eat at downtown restaurants. Even though parking at night is easy, I am more likely now to go a restaurant at the Mount or here in Bethlehem as the Council is killing the central city and it is becoming less safe. I only now come to the CBD to attend my gym in 1st Avenue and, because I am already there, to shop at PaknSave and clear my PO box in 6th Av. Were it not for the gym (which I attend for the trainer there, not because of the location), I would switch my PO box address to Bethlehem, attend Aspire gym at Bethlehem and shop at PaknSave at the Lakes. The parking is better at the Lakes, anyway. I do not want to speak to this as I think I would be wasting my time but you asked for transport feedback and I have the time to type a rant.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		53	1	Bowden, Beth Willard	In my view the likely effects of global conditions-change (the "Global context", pp. 28-29) on economic projections that underpin this Strategy are insufficiently accounted for. The continuing assumption seems to be that growth will pay for growth and that markets can and will indefinitely adjust, in their infinite nimbleness and flexibility, to changing circumstances. The history of the industrial revolution (to offer a modern example) shows us that, absent other extrinsic pressures, both producers' and consumers' enlightened and immediately proximate self-interest tend to prevail. <ul style="list-style-type: none"><li>• The shortcomings and challenges outlined in the Strategy are evidence of the gaps that can develop in such circumstances</li><li>• The analytical charts on page 136 are certainly useful but it is unclear where the projected employment numbers come from</li><li>• "Taking account" of neighbouring regional and sub-regional economic development plans is an inadequate acknowledgement of Tauranga's place in the "golden triangle" alongside Auckland and Hamilton</li></ul>
		54	13	Robson, John	Multiple lists of 'challenges', 'outcomes', 'directives', etc. are not a strategy... There is too little evidence to give me confidence that the aforementioned lists have been through a/any process that might produce a coherent and, more importantly, viable strategy that will ensure an environmental and economically sustainable future for the sub-region... Sadly, this failure, given my knowledge and experience of SmartGrowth, comes as no surprise. That said, and to be fair, I don't know whether such a future for the sub-region is even possible given the fact that any strategy for the sub-region is, literally, subject to the strategy (and consequent/subsequent statutes, policies and frameworks) of central government. And, as locally, there is little evidence that the government of NZ has been, or is currently, both willing and able to develop and deliver an environmental and economically sustainable future for our country.
		60	3	Tangata whenua collective /CTWE	The consultation process on the draft Strategy was too short.
		61	9	Child Poverty Action Group	A Way forward ? We are looking for a long term vision and plan to provide a new way forward, the Strategy is not enough. More intensive urban developments are a way forward but must be affordable. Good planning is required to provide quality low cost intensive housing that still provide privacy and useable outdoor spaces and shared facilities. We may need to look overseas for examples, such as Rightsizing Scheme - Cork City Council. Such developments should be within the existing urban footprint. If well done we believe quality intensive developments in existing urban areas would be preferred over long commutes to expensive traditional homes on tiny sections. SmartGrowth could provide a lead here. Opportunities exist to work with Tangata Whenua to find specific solutions. In the UK almost 1/3 of new homes are built by Housing Associations which then provide Social Housing, shared ownership plans, supported and specialist housing, market homes to rent and market homes to buy. We need to come up with a plan that works with and for people.
		65	1	Te Puke Economic Development Group	Smart Growth should encourage economic and social continuity and good planning for sustainable growth. Not more and more people that will negatively impact lifestyle and wellbeing. Not growth that is at odds with sustainability. Not growth for growths sake. Rather, growth that is beneficial for all of the communities of the Western Bay of Plenty sub region.
		66	10	Golden Bay, A Division Of Fletcher Concrete &	GB considers that additional wording should be inserted to recognise that industrial activities are an economic opportunity for the region. Amend the penultimate bullet point on page 40 as follows: Building on the sub-region's economic advantages - the Port of Tauranga, horticulture, food production, industrial activities and technology.
		66	9	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	GB considers that additional wording should be inserted to recognise that industrial activities also require shipping links to and from the Port of Tauranga. Amend the following 'Marine corridor' as follows: ? Shipping links to and from the Port of Tauranga for freight, industry and tourism ? Aquaculture ? Recreation

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		75	15	Andrews, Julie	I would like to see the mindset change from growth to sustainability and optimisation. I would like us to concentrate on optimising what we already have here, and in so doing, look after our existing communities. Yes, we have to provide for growth but let's not make it worse than it has to be. The more we can slow down growth, the more chance we have of being more sustainable, of shoring up our resilience and reaping the benefits listed in the Strategy at page 15.
		77	1	Socialink	<p>'Vision' should be revised to reflect contemporary perspectives</p> <p>The current Smartgrowth vision is 'Western Bay - a great place to live, learn, work and play.' (pg 16). With respect, this does not present as a vision reflecting contemporary and likely future aspirations. It seems outdated and bland. 'Great' for example, can be defined in a myriad of ways. It also focuses only on human expectations and activity, with no reference to how humans are part of the natural world, and that our activity impacts on the climate, nature, wildlife and the general environment to their and our detriment.</p> <p>We acknowledge the strategy seeks to address the four Local Government Act wellbeings (environmental, social, cultural and economic). However we think the vision itself should be more in step with contemporary concerns such as sustainability, protection of our environment, equity, inclusiveness, and health. Visions are important, they underpin the heart of our thinking, feeling and action. Below are some examples of what other regions' future plans include in their vision elements which we think are more on track:</p> <ul style="list-style-type: none"><li>• 'Liveable, safe, sustainable and healthy place.'(Greater Christchurch);</li><li>• Several phrases form the vision for the Future Proof Strategy for the Hamilton/Waikato area: A diverse and vibrant city centre, thriving towns and rural communities, place of choice, variety of housing options, protection of natural environments, landscape and heritage, productive partnerships, sustainable infrastructure and resource use, responds to climate change urgently, building resilience and supporting the transition to low carbon economy (Future Proof Strategy, Waikato)</li></ul> <p>It would be valuable to incorporate the values expressed by tangata whenua on pg 61 of the Strategy into this region's vision. The values expressed are</p> <p>"Manaakitanga - respect and care for others:</p> <p>We build warm and affordable homes and communities for all socioeconomic backgrounds. We also are good ancestors who plan and make decisions for our mokopuna and future generations.</p> <p>Kaitiakitanga - environmental responsibility and reciprocity:</p> <p>We are dependent on the natural world for their well-being and survival and therefore have a responsibility to care for and protect the environment in return. We are good ancestors who leave the natural environment in a better state for our mokopuna and future generations. Environmental reciprocity involves moving away from an exploitative mindset and creating a more balanced relationship between human activity and nature to ensure the health and wellbeing of all."</p> <p>These values will also resonate with many people who are tau iwi, 'reflecting the interconnectedness between people, place and space and recognising the need for a healthy environment for future growth that is responsive to the concerns and aspirations of tangata whenua.'</p>
		80	6	Hickson, Paul	<p>SmartGrowth must consider the loss of urban space and sun robbing in its residential planning. It must also recognise that our valuable coastline and ocean adjoining the Bay of Plenty has to be protected. The importance of BOP Regional Council and our rural sector through Fresh water Farm Plans and planting initiatives must be noted.</p> <p>My family have been ratepayers at the Mount since 1976. I made a submission in opposition to Plan Change 33 as did many others. Smart Growth should look carefully at the summary of these submissions rather than plan on what Central Government requires under Plan Change 33. Planning for 50 years requires community buy in and those who live and invest in communities should be treated as the most important.</p> <p>What ever Smart Growth comes up with in its final plan there has to be flexibility so that Councils may consider new ideas instead of referring to their rule bule. A good idea, after community consultation and approval, should never be cast aside because of decision makers hiding behind Smart Growth.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		83	1	Bell Road Limited Partnership	The Draft Strategy in its current form has failed to provide a guiding framework to deliver the necessary housing and employment land outcomes needed for the sub-region. This situation has resulted in significant underperformance of housing and business land supply across the sub-region and an affordability crisis. Tauranga now faces unprecedented housing and business land supply issues, and under the National Policy Statement - Urban Development (NPS-UD) a more coordinated planned and integrated approach is required to dealing with growth management. The ineffectiveness of previous SmartGrowth Strategies has occurred due to a failure to focus on "Growth Management", to work more closely with the development community to provide practical advice about what factors affect the feasibility of development such as land cost, construction cost, infrastructure, realistic development timeframes and robust construction methodologies.
		87	10	Ngai Tukairangi Trust	- The consultation process on the draft Strategy was too short.
		91	12	Sustainable Bop Trust	Please Slow Down!
		91	17	Sustainable Bop Trust	Does the strategy adequately take into account new technology and AI?
		91	2	Sustainable Bop Trust	The Overarching Goal of SmartGrowth SmartGrowth should encourage sustainable economic and social continuity, as well as managing growth to ensure optimal social and environmental outcomes. It should not effectively be a growth plan to attract more and more people to our city and sub-region, in a way that negatively impacts people's lifestyles and wellbeing, and further depletes natural resources and damages the environment.
		91	30	Sustainable Bop Trust	25. In other words, is this a sustainable strategy? 26. If the answer is no, then why move forward with this Strategy? Why not change it?
		94	2	Katikati Community Board	Smart Growth should encourage economic and social continuity and good planning for sustainable growth. Not more and more people that will negatively impact lifestyle and wellbeing. Not growth that is at odds with sustainability. Not growth for growths sake. Rather, growth that is beneficial for all of the communities of the Western Bay of Plenty sub region. "
	3: Transformational shifts	42	11	Gordon, Carole	Strategy 2023 is the opportunity to embrace the collaborative knowledge needed to overcome the disturbing social and economic divide that stresses people and the planet. The Strategy declares that transformative shifts will guide what and how to do things differently (p58). Further it notes that rapid population growth has resulted in negative impacts (p137) such as housing affordability, transport congestion, and shortage of industrial land. This analysis does not unfortunately include the very deep and evident social stress and inequalities. The Strategy does not sufficiently examine the social, cultural and environmental impact of growth on tangata whenua.
		42	2	Gordon, Carole	The Strategy identifies six 'transformational' shifts (p18). However, it omits a comprehensive position on three vitally significant structural planning contexts: <ul style="list-style-type: none"><li>• Responding to the demographic transformation</li><li>• Developing sustainable hyperlocal '15minute' communities.</li><li>• Intergenerational cost of growth assumptions.</li></ul>



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Topic	Issue	Sub ID	Sub Point	Name	Summary
		57	1	National Council Of Women Tauranga (Ncw)	<p>1 Include Population Change as a key challenge.</p> <p>2 Include more detail on a strategic approach to:</p> <ul style="list-style-type: none"><li>• Who our people are now, and in the future (disaggregating data).</li><li>• How infrastructure can best serve the diverse needs of more older people.</li><li>• How Elders can be engaged in co-design processes.</li><li>• The affordability of growth given a growing sector of older residents.</li></ul> <p>3 Give attention to, and seek to better integrate the actions of: The Governments' Better Later Life Strategy 2019 -2034.And Age -friendly Urban Places Guide.</p> <p>4 Adopt and apply the UN Decade of Healthy Ageing Guiding Principles as a basis for strategic planning. (attached)</p>
		59	2	Ministry Of Education	<p>3. Part 1 - Vision, Objectives and Transformational Shifts</p> <p>The Ministry supports the Smart Growth vision that Western Bay is a great place to live, learn, work and play. In particular the Ministry is supportive of social and community well-being being at the heart of planning for growth in the Western Bay of Plenty sub-region. The accompanying objectives which address environmental, cultural, social and economic well-beings are also supported.</p> <p>The Ministry is broadly supportive of the identified transformational shifts which will guide the priorities in the Implementation Plan. In relation to Transformational Move 6 (Radical change to the delivery, funding and financing model for growth), the Ministry has a particular interest in exploring options for shared service models for social and community infrastructure. Relief sought: Retain the vision, objectives and transformational shifts as notified.</p>
		62	2	Envirohub	<p>We note that the Social Objectives do not include any focus on people. This should be developed and include a statement on equitable outcomes. Whilst the trickle down theory does not appear to work, a rising tide does most certainly lift all boats (except perhaps the Rena?!)</p> <p>Challenges and Opportunities and Transformational Shifts:</p> <p>The deteriorating state of our Environment and the Loss of Biodiversity have not been noted as a challenge. We ask that this be included specifically as the environment and its limits are the base on which the strategy is built. The more we compromise the natural environment the less likely we are to have either a thriving society or a flourishing economy.</p> <p>Opportunities should not only include cultural environmental aspirations but should note the high level of active awareness there is of the natural environmental from most of our citizens.</p> <p>The Transformational Shifts as concepts are supported. The trick will be to consciously ensure that the shifts really are implemented and are not subsumed into 'business as usual'.</p>
		71	5	Zespri International Limited	<p>We note Business NZ's call for the government to use a wide range of funding mechanisms to get better quality infrastructure more quickly and allocate risk and cost7.</p>
		72	3	Nga Potiki a Tamapahore Trust	<p>NPaTT supports the principles Nga Wai ki Mauao me Maketu.</p> <p>However, it notes that Nga Potiki has significant maunga and other landmarks within its rohe.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		73	1	Property Council New Zealand	<p>4. 'Transformational shifts'</p> <p>4.1 Property Council welcomes the intent behind many of proposed 'transformational shifts' for the region and wishes to thank SmartGrowth for their work to date. The draft SmartGrowth Strategy currently identifies six 'transformational shifts' for change, which are intended to provide guidance when it comes to implementing the SmartGrowth strategy.</p> <p>4.2 The proposed 'transformational shifts' are:</p> <p>I. Homes for Everyone</p> <p>II. Marae as Centres and Opportunities for Whenua Maori</p> <p>III. Emissions Reduction through Connected Centres</p> <p>IV. Strong economic corridors linking the East and West to the City and the Port</p> <p>V. Restore and enhance eco-systems for future generations; and</p> <p>VI. Radical change to the delivery, funding, and financing model for growth.</p> <p>4.3 We believe that there are additional factors that should also be taken into account for the 'transformational shifts' in the finalised SmartGrowth strategy. Property Council recommends that SmartGrowth undertakes work to further refine the 'transformational shifts' for change.</p> <p>4.4 For example, greater consideration of access to public amenities and by extension the development of thriving communities. Access to public amenities and community has been affected by historic underinvestment across the region, and in our view, should be considered with the 'transformational shifts'.</p> <p>4.5 We recommend expanding the proposed eco-system 'transformational shift' to include environmental and climate resilience, especially in light of this year's extreme weather events. Furthermore, we note the ongoing economic imperative to protect the region's highly productive land within the proposed shifts and wish to also see this incorporated within the framework.</p>
		73	5	Property Council New Zealand	<p>The draft SmartGrowth strategy sets out timing for growth-related infrastructure required to support urban growth areas over time. Property Council notes that numerous projects are either partially funded or not funded. Property Council recommends that SmartGrowth and its partner Councils undertake work to develop viable and alternative approaches to funding and financing for growth-related infrastructure. Property Council advocates for the use of transparent, beneficiary pays alternative funding models for local government, especially in terms of delivering critically needed infrastructure. Examples of these models include targeted rates, user-pays systems, and Special Purpose Vehicles ("SPVs") as enabled under the Infrastructure Funding and Financing Act ("IFF"). In particular, we strongly support use of the IFF Act to fund infrastructure and investment. We have previously championed Tauranga City Council's use of the IFF Act for other projects, such as the Transport System Plan or Civic Precinct. Ultimately, this approach makes the cost of new infrastructure more transparent, improves intergenerational equity by spreading the cost over a sustained time period and also unlocks additional infrastructure investment. Property Council also strongly supports continued advocacy from SmartGrowth and its partners for greater central government investment in development enabling infrastructure. We firmly support future investment from central government for infrastructure that unlocks critically needed new housing supply across the region, as well as for transport infrastructure such as State Highway 29. Co-funding infrastructure with central government in an important funding tool, that helps alleviates part of the burden of the burden on local ratepayers.</p>
		75	13	Andrews, Julie	<p>Air pollution (refer transformational change 8.5)</p> <p>There is also the serious issue of pollution which needs to be addressed, namely the air shed at the Mount. I would have expected options in the Strategy to move the polluting industry away from schools, marae and residences.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		75	2	Andrews, Julie	<p>8.3 - Emissions reduction - I question whether this can be achieved through the proposed Connected Centres</p> <p>• 8.6 - Change to delivery, funding and financing model for growth - I believe this should be done through government funding, not PPPs. PPPs have proved financially disastrous in other parts of the world (eg the UK). Refer <a href="https://jubileedebt.org.uk/wp-content/uploads/2017/02/The-UKs-PPPs-disaster_Final-version_02.17.pdf">https://jubileedebt.org.uk/wp-content/uploads/2017/02/The-UKs-PPPs-disaster_Final-version_02.17.pdf</a> - "Lessons on private finance for the rest of the world". Below is an extract:</p> <p>This briefing sets out major problems and risks the UK has encountered through its extensive experiment with PPPs, including how they have;</p> <ul style="list-style-type: none"><li>- Cost the government more than if it had funded the public infrastructure by borrowing money itself</li><li>- Led to large windfall gains for the private companies involved, at public expense</li><li>- Enable tax avoidance through offshore ownership</li><li>- Led to declining service standards and staffing levels</li><li>- Hollowed out state capacity to design, build, finance and operate infrastructure</li><li>- Eroded democratic accountability</li></ul> <p>PPPs are hugely unpopular in th UK, with 68% of respondents to a survey in England saying PPPs should be banned. In Scotland, which has a higher proportion of projects per person, 76% of responents say they should be banned. This unpopularity has led to PFI being rebranded in both England and Scotland (see section 5 on page 7)</p> <p>Emissions reduction is critical. As is noted in the Strategy, climate events are changing the way we live. Climate change is accelerating at rate that is surprising (and terrifying) even the experts. It follows from this that everything we do needs to be first viewed through the lens of climate mitigation and adaptation. Two of my primary concerns are that:</p> <ol style="list-style-type: none"><li>1. the Connected Centres model in association with greenfields development is not the best option to achieve the objectives of the Strategy. In particular there is no evidence that implementing the Strategy will result in the large reductions in carbon emissions that arerequired. We need an evidence-based carbon emissions analysis to make informed decisions.</li><li>2. the housing proposed in the Strategy will not result in "homes for everyone". I am concerned about a shortage of affordable homes and preventing the growing homelessness we are seeing in the community.</li></ol>
		78	3	Clear The Air & Tauranga Moana Fumigant	<p>15. We note the Transformation Shifts and consider that resolving Mount Maunganui Airshed pollution has to be a priority that is at least equal to those identified, because it addresses real human health risks.</p>
		81	12	Urban Task Force	<p>Transformational Shifts</p> <p>The Urban Taskforce agrees with the use of the transformational shifts which are identified for change and which provide guidance when implementing the strategy. The transformational shifts are identified as:</p> <ol style="list-style-type: none"><li>1. Homes for everyone</li><li>2. Marae's being centres and opportunities for whenua Maori</li><li>3. Emission reduction through connected centres</li><li>4. Strong economic corridors linking the east and west to the city and the port</li><li>5. Restoration and enhancements of ecosystems for future generations</li><li>6. Radical change to the delivery funding and financing model for growth.</li></ol> <p>Although the Urban Taskforce supports the six principles relating to transformational shifts we consider that the Strategy should also incorporate a seventh shift, this being the need for further social infrastructure such as public and community amenities to be recognised. The reason for this is that there has been significant underinvestment in such infrastructure by successive Councils in Tauranga, and the city remains in "catch up mode". The Strategy needs to address this.</p> <p>Funding and Financing of Growth</p> <p>The Urban Taskforce strongly supports the need for radical change to the delivery funding and financing model for growth. A range of different funding and finance models must be identified within the strategy including options for public-private partnerships. The Urban Taskforce also supports the use of the Infrastructure Funding ad Finance Act with respect to the funding of infrastructure. Tauranga City Council has successfully used this Act for other projects which is a much fairer and efficient approach to infrastructure funding and one which spreads the cost over a sustained time period improving intergenerational equity and unlocking additional infrastructure investment.</p> <p>Greater Central Government investment is also required to enable the development of infrastructure and further policies should be incorporated within the strategy to promote Central Government funding of infrastructure through a partnership arrangement as an important funding option.</p>

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		83	3	Bell Road Limited Partnership	<p>Transformational Shifts</p> <p>Bell Road LP supports the transformational shifts for the region as set out in the Draft Strategy, which are as follows:</p> <ol style="list-style-type: none"><li>1. Homes for Everyone</li><li>2. Marae as Centres and Opportunities for Whenua Maori</li><li>3. Emissions Reduction through Connected Centres</li><li>4. Strong economic corridors linking the East and West to the City and the Port</li><li>5. Restore and enhance eco-systems for future generations; and</li><li>6. Radical change to the delivery, funding, and financing model for growth.</li></ol> <p>However, we consider that there is also a need for the inclusion of social infrastructure/public amenities to be included as a transformational shift, as there has been significant underinvestment in Tauranga.</p>
		91	29	Sustainable Bop Trust	<p>23. Will growth ever pay for growth? e.g. Are higher DCs or IFF used for new greenfields?</p> <p>24. If not, how will we afford the infrastructure to cater for all this extra growth? (We already have the highest rates of any NZ city and increasing elder poverty.)</p>
		91	3	Sustainable Bop Trust	<p>Funding</p> <p>The reality is that we have had much the same growth strategy for 20 years. Some things have been implanted, others haven't. It always comes back to funding.</p> <p>Why does this Draft Strategy not contain a funding plan? It is only really a Strategy if it's a funded plan - otherwise it's just another document that will sit on a (virtual) shelf until it is funded.</p> <p>More specifically on this issue, the Draft Strategy states (p 159):</p> <p>Central Government has introduced tools to assist with the delivery and funding of urban development. This includes the Infrastructure Funding and Financing Act 2020, the Urban Development Act 2020, the Housing Acceleration Fund and the Maori Infrastructure Fund.</p> <p>That wording is misleading. The Infrastructure Funding &amp; Financing Act is a means of securing higher-cost financing for 'off-the-books' debt. It is still funded by ratepayers, who still have to repay the debt - paying higher interest charges than for Council loan-funded debt.</p> <p>TCC itself stated:</p> <p>"Council has looked to the Infrastructure Funding and Financing Act (IFF) to help with some of these balance sheet constraints but the cost of this also falls on the ratepayer. The impact of inflation and rising interest rates on the cost of living for our communities mean that there is limited room for rate rises or additional IFF levies (our ratepayers have constrained financial capacity, and many are already struggling with cost increases)."</p> <p>That is the key point. Financing debt is a minor problem. As TCC indicated, the key issue is funding of debt. The focus needs to be on who pays for growth. The reality is that TCC residential ratepayers will next year be paying an average of roughly \$1000 rates just to finance the interest on the official Council debt. Let alone another chunk of money to start paying off the IFF Transport levy. Much of that debt relates to growth.</p> <p>What's more, we read that Tauranga City ratepayers will have a debt of \$0.735 billion by 2045 just for growth in Papamoa East-Te Tumu unless we start repaying the debt next year. Growth has not and will not pay for growth unless we change the model!</p> <p>IFF and PPPs are not the answer. We need to have a mature, comprehensive, informed conversation about this issue across all our communities. And we need to make a sustainable democratic decision about this important matter.</p> <p>The Need for Up-Front Infrastructure to Support Intensification If high-density development is enabled, we have serious concerns about the lack of funding for infrastructure. This could severely compromise the quality of the outcomes of Plan Change 33. We think the SmartGrowth partners need to 'seize the day' and push back more strongly at central government for wanting existing residents to largely fund its growth agenda. Tauranga needs more funding now, especially for public housing and public transport.</p>

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	4: Implementation plan	42	7	Gordon, Carole	<p>There is a stated strategic urgency to "do things differently."</p> <p>What does the Strategy really do to advance enhanced urban ecosystems?</p> <p>The Strategy acknowledges that there is a need to "do things differently." It is not at all clear how it will "collectively address the big challenges," (p14) to find solutions to overcome issues such as:</p> <ul style="list-style-type: none"><li>• Increasing social inequity and chronic homelessness.</li><li>• Provision of homes for an ageing population.</li><li>• Implementation of discretionary zoning</li><li>• Integrating health and social care in infrastructure planning to improve equity and access and health status.</li><li>• Climate and heat mitigation by greatly increased tree planting in multigenerational green space urban environments</li><li>• Diminishing social cohesion.</li></ul>
		48	1	Tauranga Business Chamber	<p>We appreciate that this strategy informs future planning processes such as city plans, social infrastructure planning, transport planning, local plans, and the annual plan and long-term plan.</p> <p>However, the objectives for transport and modal shift are at best, aspirational, but lack a transparent plan on how communities will achieve it. If SmartGrowth has a plan to achieve these targets, then the plan should be more transparent to gain more informed feedback from communities. SmartGrowth is an effective direction setting planning tool. It's weakness is in the delivery by the partners as they face push-back from communities in discussing the detail.</p>
		48	4	Tauranga Business Chamber	<p>SmartGrowth is currently the best joint local/central government planning tool that is available. It has an established brand that doesn't need to change for the sake of it. The challenges for SmartGrowth have always been with the implementation by the individual partners. This is discovered by how they engage with communities on the detailed plans (e.g. rates, RMA plans, budgets, local infrastructure etc.) and their elected representatives. SmartGrowth has often been leveraged by the usual stakeholder groups as an alternative channel to amplify their voice where the general public does not usually show their views. However, as we've recently seen with TCC's Plan Change 33 in Mount Maunganui.</p>
		53	10	Bowden, Beth Willard	<p>How, exactly, are designs for better public transport to be achieved in the Councils' planning processes? Is this, too, to be left to the Implementation and Funding Plan?</p>
		53	2	Bowden, Beth Willard	<p>Without an Implementation Plan, how is the balance to be struck between the various land use pressures and changes outlined in the Strategy? Are we to continue to rely on ad hoc decisions made via private Plan Change applications? If so, on what principles do decision-makers (and private planning consultants) evaluate private landowners' economic interests against agreed (and relatively stable) criteria?</p> <ul style="list-style-type: none"><li>• What assumptions have been made about central government's ability or willingness to fund more of the growth that is policies (particularly immigration into the north of the North Island) have created?</li><li>• In general, without a Funding and Implementation Plan, how can those trying to meet these strategic ambitions sort out their priorities? (This will be a recurring theme in my submission.)</li></ul>
		53	22	Bowden, Beth Willard	<p>As with economic development in general, implementation, funding and financing are the missing fundamentals in this part of the Strategy.</p>
		53	27	Bowden, Beth Willard	<p>In general, without a Funding and Implementation Plan, how can those trying to meet these strategic ambitions sort out their priorities?</p>

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		59	17	Ministry Of Education	It is noted that the Implementation and Funding Plan for the FDS (and the wider Strategy) will be developed in accordance with the NPS-UD requirements. The Ministry acknowledges the strong partnership and collaborative approach to growth planning that has been undertaken by Smart Growth over the last 20 plus years and looks forward to working with the Smart Growth partnership in the development of the Implementation and Funding Plan. The Ministry also looks forward to being involved in more detailed planning for priority growth areas such as through local spatial and structure planning.
		62	1	Envirohub	<p>The long term value of Smartgrowth relies on the success of the four pillars. This particularly applies to the pillars of 'Partnership' and 'Collaborative Leadership'.</p> <p>Partnerships have significantly developed since the inception of SmartGrowth. . In relation to cultural partnerships, growing respect, understanding and appreciation of a different indigenous worldview has slowly evolved. This has benefited all of us.</p> <p>However, the Collaborative Leadership pillar, especially in respect of Councils, needs ongoing championing, nurturing and advocacy from Governance, CE's and senior staff to ensure the long-term effectiveness of the Strategy. If this is compromised then the Strategy will be 'just another document' and all the investment in it will be wasted.</p> <p>In respect of the Integration pillar, more explanation would assist so that it is clear what is intended. Envirohub has assumed that many of the objectives of the Smartgrowth Strategy will be implemented through Councils' existing proposed action plans and funding commitments. What is not obvious, at this point, is how that intention can be visibly demonstrated so that the public can assess whether the Smartgrowth objectives are being achieved. The proposed Implementation Plan would be a good place to include such linkages. It should demonstrate that integrated thinking is ongoing, not just within each sector of the Strategy but across the sectors as well.</p>
		64	2	Classic Group	<p>Critical Role of Developers in Implementation:</p> <p>We cannot stress enough the vital role that private developers, including ourselves, play in successfully implementing any development strategy. Regardless of their meticulousness, plans remain static without active participation from the private sector. In the context of the SmartGrowth Strategy and Future Development Strategy, developers must be actively engaged throughout the planning and implementation phases. Here are three compelling reasons why developer involvement is paramount:</p> <p>Expertise and Experience: Developers, especially those with a significant track record like Classic Group, bring invaluable expertise and experience to the table. Understanding the intricacies of land development, market dynamics, and infrastructure requirements, developers can offer practical insights that are essential for formulating realistic and achievable strategies.</p> <p>Market Responsiveness: Developers operate at the forefront of market demands. Their involvement ensures that the strategies devised are not only visionary but also responsive to the immediate and evolving needs of the community. This market-driven approach is crucial for creating sustainable, market-oriented developments that align with the region's growth trajectory.</p> <p>Fostering Public-Private Partnerships: Collaboration between the public and private sectors is fundamental for achieving comprehensive and sustainable development. Developers can act as strategic partners, contributing resources, expertise, and funding to complement public initiatives. Such partnerships can amplify the impact of SmartGrowth initiatives and ensure their long-term viability.</p> <p>Focus on Priority Development Areas (PDAs): Developers, particularly within Priority Development Areas, are instrumental in unlocking the potential of these strategic zones. Their active participation in PDAs increases the likelihood that development occurs at the required pace and scale, aligning with the overarching goals of SmartGrowth.</p> <p>We emphasise the need for sustained collaboration between SmartGrowth and private developers, especially within Priority Development Areas. We are prepared to contribute our expertise, resources, and insights to ensure the success of these strategies.</p>

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		67	7	Ford Land Holdings Pty Ltd	<p>The implementation of the FDS is vital to:</p> <ol style="list-style-type: none"><li>1. Ensure that there is a multi-agency coordinated plan to deliver the FDS outcomes within the nominated timelines.</li><li>2. Provide certainty for public and private sector investment.</li><li>3. Monitor and measure the FDS.</li><li>4. Enable long term labour, materials and natural resources planning and investment to deliver the infrastructure and built form outcomes sought in the FDS.</li></ol> <p>The Implementation Strategy requires significantly more work in the form of a Project Plan and Resourcing Plan that will provide the basis for the SmartGrowth Partnership to provide adequate funding and resources to deliver the FDS.</p> <p>FLH requests that:</p> <ol style="list-style-type: none"><li>a) A full Project Plan and Resourcing Plan be prepared for the FDS; and</li><li>b) Informed by the Project Plan and Resourcing Plan, that a SmartGrowth / FDS Implementation Office be established with adequate funding and resources to deliver the FDS.</li></ol>
		68	7	Tumu Kaituna 14 Trust	<p>The implementation of the FDS is vital to:</p> <ol style="list-style-type: none"><li>1. Ensure that there is a multi-agency coordinated plan to deliver the FDS outcomes within the nominated timelines.</li><li>2. Provide certainty for public and private sector investment.</li><li>3. Monitor and measure the FDS.</li><li>4. Enable long term labour, materials and natural resources planning and investment to deliver the infrastructure and built form outcomes sought in the FDS.</li></ol> <p>The Implementation Strategy requires significantly more work in the form of a Project Plan and Resourcing Plan that will provide the basis for the SmartGrowth Partnership to provide adequate funding and resources to deliver the FDS.</p> <p>TK14 requests that:</p> <ol style="list-style-type: none"><li>a) A full Project Plan and Resourcing Plan be prepared for the FDS; and</li><li>b) Informed by the Project Plan and Resourcing Plan, that a SmartGrowth / FDS Implementation Office be established with adequate funding and resources to deliver the FDS.</li></ol>

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		73	6	Property Council New Zealand	<p>7.1 The future success of the SmartGrowth initiative will depend on the ability of SmartGrowth partners to effectively implement the proposed strategy. It is critical that effective long-term planning translates to practical outcomes, in terms of factors such as infrastructure provision, land supply or transport. Historically, the Bay of Plenty region has struggled at times to effectively implement past SmartGrowth strategies.</p> <p>7.2 Effective implementation will require SmartGrowth partners to clearly enshrine the proposed SmartGrowth 2023-2073 strategy into their approach to matters such as Long-term Plans, Annual Plans, and other key plans and policies. Given the timeframe on which the proposed SmartGrowth strategy operates, it is also important that implementation is durable across political cycles to ensure certainty across the region.</p> <p>7.3 There is a clear relationship between planning outcomes in the Bay of Plenty region and planning outcomes in the Waikato. Effective alignment between both regions is vital for meeting our economic, social and environment objectives. Property Council recommends that SmartGrowth should co-ordinate and collaborate with Future Proof in the Waikato.</p>
		77	2	Socialink	<p>While we understand the Strategy sets high level direction, in some ways the Strategy may be overemphasising high level broad challenges in comparison to what can be done. Many of its opportunities on page 40 are at a high level rhetorical statement - 'encouraging', 'creating' 'enhancing'.</p> <p>It would be helpful to have more practical ideas, detail and examples on what and how things can be achieved, which in turn could help lead and focus direction.</p> <p>While the 'how to' options might be laid out in the Implementation Plan, we think some of the thinking about this would be helpful to lay out in the Strategy.</p>
		81	13	Urban Task Force	<p>Large areas of employment and residential land (such as at Te Puke and elsewhere) are unable to be unlocked due to the inability of District &amp; Regional Council Partners to work collaboratively together on stormwater solutions. There have been many meetings between the Councils, but little in the way of outcomes. Given the housing and business land supply crisis and the critical reliance on areas such as Te Puke to deliver land supply in the short term, actions are required to be included in the strategy to require Regional &amp; District Councils to collaborate and to reach solutions using a taskforce/working group tasked with identifying and implementing solutions to unlock such land in a timely and efficient manner.</p> <p>There are many other examples across the sub-region where the Partner Councils must start working more collaboratively in a partnership role, in anticipation of amalgamation &amp; combined services (i.e., combined water services, and a combined Regional Planning Committee) as this appears to be something the new government will encourage.</p> <p>Reviewing delivery and cooperation between the Partners and their performance should also be a key requirement.</p> <p>These actions should be included in the Implementation and Funding Plan.</p>



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		81	3	Urban Task Force	<p>SmartGrowth is often criticised for its lack of delivery. There is a real opportunity to improve delivery of the Strategy through better engagement and collaboration with the development sector. There are a number of actions which should be incorporated within the Strategy in relation to the development sectors involvement which also reflect the requirements of the NPS-UD. These actions are as follows:</p> <p>1. The development Sector Group (DSG) should be formally included in the SmartGrowth structure, with representation on the SmartGrowth Leadership Group (as per the model for the combined Tangata Whenua Forum and Infrastructure Providers).</p> <p>2. Priority Development Areas should involve strong and early engagement with the development community, both in terms of identification but also in terms of developing servicing and infrastructure solutions for land.</p>
		81	6	Urban Task Force	<p>Engaging with the development community after the completion of the bulk of the technical work will miss key information and opportunities and is a recipe for future conflict and rework. This should be included as a key action in the Implementation and Funding Plan. In the interim, all commercial centres identified through Spatial Plan processes or existing District Plan Centre Network maps should be included on Page 104 of the strategy.</p>
		81	8	Urban Task Force	<p>Beyond the identification of industrial business land capacity, there is a need to align zoning and plan provisions with the National Planning Standards. This work still needs to be completed and the review needs to involve the Bay of Plenty Regional Council to address integration between land use and the Regional Plan provisions for air and water quality. At present this is occurring in a piecemeal manner and is creating inconsistency and significant delays in delivery at the time of plan change/significant consent processes. The review needs to be based on collaboration with the development community from conception to completion. Engaging with the development community after completion of the bulk of the work is a recipe for conflict and rework. Again, this is a key action that should be included in the implementation and funding plan.</p>
		83	11	Bell Road Limited Partnership	<p>Industrial Strategy Review</p> <p>Beyond the identification of industrial capacity is the need to align zoning and plan provisions with the National Planning Standards and these include:</p> <p>1. Mixed use zone</p> <p>2. Light industrial zone</p> <p>3. General industrial zone</p> <p>4. Heavy industrial zone</p> <p>5. Port zone</p> <p>6. Airport zone</p> <p>7. Special purpose Zone</p> <p>The review needs to involve the Bay of Plenty Regional Council to address integration between land use and their regional plan provisions for air and water quality.</p> <p>At present this is occurring in a piecemeal manner and creating inconsistency and significant delays in delivery at the time of plan change/significant consents. The review needs to be based on collaboration with the development community from conception to completion. Engaging with the development community after completion of bulk of the work is a recipe for conflict and rework. Again, this is a key action that should be included in the Implementation and Funding Plan.</p>

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		83	4	Bell Road Limited Partnership	<p>Role of Developers in the SmartGrowth Partnership</p> <p>The role of the development community (including organisations such as Bell Road LP and its Shareholders) is critical to the success of the implementation of the SmartGrowth Strategy, and there is currently very little in the way of policy directive within the Draft Strategy which requires the SmartGrowth Partners to work collaboratively with the development community.</p> <p>The Draft Strategy provides limited recognition that it is actually developers that will lead the delivery of much of the strategy apart from the "lead time to development" diagram on page 144. This is the most explicit reference, but even here the developer's role is largely referred to as being related to "subdivision and building consent".</p> <p>The reality is completely different. Developers have a significant role in long term planning, working in close collaboration with the Councils and other providers to deliver urban outcomes from the early inception of the planning process. The importance of the role of developers is also very clear in the National Policy Statement - Urban Development (NPS-UD), which requires that Tier 1 Councils must:</p> <ol style="list-style-type: none"><li>1. Engage with the development sector to prepare a Housing and Business Development Capacity Assessment which can be validated.</li><li>2. Engage with the development sector and identify significant opportunities for urban development and the Future Development Strategy based on practical and real advice around what factors affect the feasibility of development, along with timeframes and infrastructure risks.</li><li>3. Seek advice from the development sector about what factors affect the feasibility of development;</li><li>4. Determine actual capacity based on commercially viable land and the relationship between costs, timing, risks and revenue.</li><li>5. Collaborate to identify and activate significant opportunities for future development.</li></ol> <p>This mandated role of developers needs to be clearly identified as a minimum in the Draft Strategy. The Draft Strategy needs to be revised to include clear provisions that identify and recognise the significance and importance of much of the growth in the subregion being developer led, including the identification of land suitable for development and subsequent Plan Change or Fast Track consent processes for significant processes. It is noted as an example, that there is no recent track record of significant Council led plan changes in Tauranga over the last 10 years, with all significant Plan Changes being developer led.</p> <p>Without developer confidence and investment, the actions from SmartGrowth are unlikely to be realised. SmartGrowth is often criticised for its lack of delivery. There is a real opportunity to improve delivery of the Strategy through better engagement and collaboration with the development sector through several measures including:</p> <ol style="list-style-type: none"><li>1. The Development Sector Group being formally included in the SmartGrowth structure, with representation on the SmartGrowth Leadership Group, as it is for Tangata Whenua and Infrastructure Partners.</li><li>2. The Priority Development Areas process being one which involves engaging with developers in problem identification and resolution, at an early stage, and in a partnership role.</li></ol>
		84	9	Mcmaster, Bill	<p>1.33 Part 5 Implementing the SGS. It is noted in this part of the SGS that the Implementation and Funding Plan (IFP) will be developed as a separate document and updated annually. It is not part of the FDS under the NPS-UD.</p> <p>1.34 It is submitted that the TCC PC33 proposal on high density at Mount North be fully costed under the IFP to assess whether the SM partners are in a position to be able to fund the infrastructure components relating to the increased dwellings allowed under the PC33 Mount North high density intensification proposals.</p>
		85	3	Tauranga Crossing Limited	<p>16. While TCL acknowledges that the Strategy identifies that "further work is required in terms of developing a detailed sub-regional commercial centres strategy" that will form part of the Implementation Plan supporting the Strategy, the Implementation Plan is not part of the FDS and is not subject to the consultation and engagement requirements of the Local Government Act 2002; nor does not have the effect of an FDS when Councils are preparing or changing RMA planning documents.</p>
		86	14	Ngai Tukairangi Hapu Trust	<p>Ngai Tukairangi hapu lack capacity and capability to input into the myriad of planning strategies in our Funding for the development of a spatial / environment management plan rohe. We propose to secure funding of \$250,000. This is a significant step toward fostering a synchronized approach within Matapihi. This initiative aims to align various efforts and initiatives under a unified strategy that truly represents the aspirations of Ngai Tukairangi hapu. The ultimate objective is to create a Matapihi-led, Matapihi-driven approach that addresses the unique challenges faced by our community. The proposed funding will be instrumental in developing a comprehensive spatial plan and hapu environment management plan. These plans will serve as foundational documents, outlining a cohesive vision for Matapihi's future. By investing in these strategic frameworks, we empower our hapu to assert control over our own destiny and preserve our cultural heritage in the face of environmental challenges. In seeking this funding, we aim to position our hapu as the drivers of change, taking proactive steps toward environmental preservation, climate adaptation, and community resilience. The proposed spatial plan and environment management plan will reflect the unique identity and aspirations of Matapihi, serving as a testament to the strength and unity of Ngai Tukairangi hapu.</p>

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		87	2	Ngai Tukairangi Trust	The Trust would like the SGS to better fund an implementation programme that assists hapu in the sub-region to develop their own spatial plans, or revise and update existing planning documets. There also needs to be better alignment with other planning projects so as to relieve some of the engagement fatigue felt by hapu, Maori land trust representatives and other members.
		87	5	Ngai Tukairangi Trust	The importance of HPL can not be overstated, and the Trust would like to see more resources made available, especially for tangata whenua investing in development projects, to understand the impacts of incorrect land use. Following the recent storms and the event of Cyclone Gabrielle, there is an obvious issue with previous land use and planning instruments across the country and the SGS is an opportunity to plan appropriately.
	5: Consultation and engagment	3	0	Wansbrough, Nathan	It was important that the consultation process was open and accessible to all.
		53	20	Bowden, Beth Willard	<p>This submission is therefore my own, but it is a considered statement, and one that asks, in particular, for a wider scope of engagement on this Strategy, one that is not unduly constrained by the formalities of the Special Consultative Procedure (SCP) under the Local Government Act 2002. In saying this, I accept of course that SmartGrowth's function is delineated as advisory and as offering a framework and guidance to the planning processes to be undertaken by the Bay of Plenty's local authorities. My years of experience with these processes however indicate some significant deficiencies in Councils' ability to adjust to and incorporate in their District and Regional Plans the grassroots knowledge, understanding and deep love for the places in which local people live, work, play and study. Precisely because of its advisory role, SmartGrowth is well placed to provide Councils with the benefits of critical analysis and courageous insights from outside standard politics and bureaucracy. It should be valued, not dismissed, for doing so.</p> <p>In this submission I intentionally made only rather general points, often in the form of questions. I did so in the hope that there may be opportunities beyond the legislated process to answer some of these questions and to establish a more consensus-based, joined-up strategy that allows citizens to trace clear connections between their present understanding of their place(s) and what comes to pass in their 30-50 year future.</p> <p>Some points on consultation/engagement</p> <p>I note that under the National Policy Statement on Urban Development (NPS-UD) SmartGrowth is required to consult only with local authorities, central government agencies and tangata whenua. The evident gap that remains - the opinions and viewpoints of the general community - is to be dealt with under the SCP mentioned above. I note that the bare month stipulated under s. 83 (1) (b) (iii) has been allowed for this consultation. I also however draw your attention to the 'catch-all' provision at s. 83 (c):</p> <p>This section does not prevent a local authority from requesting or considering, before making a decision, comment or advice from an officer of the local authority or any other person in respect of the proposal or any views on the proposal, or both.</p> <p>as well as the provisions of s. 83AA. It would, in the absence left by the SmartGrowth Forums, be gratifying to create some combined consultative workshops that brought together the various, compulsorily-consulted parties with community-based experts across a range of fields. Perhaps by this means a less silo'd, evidence-shared relationship between the pressures of growth, its benefits and and its limits, could be achieved.</p> <p>It is also possible that, by escaping the constraints of an on-line survey that seems to be the only route for making a written submission within the stipulated timeframe, we could accomplish a richer and more integrated sense of the growth management principles that are in play. Further, it would be really very useful if the structure of the survey - the ordering of its topics, for instance - could mirror that of the Strategy Document itself. There is an apparent internal logic to the "story" of the Strategy. The survey's approach encourages a single-issue response from submitters. I think that a Strategy offering a 30-50 year time horizon should acknowledge and foster attitudes that demonstrate how everything is connected to everything else. Perhaps the Forums had indeed done their dash. But they left a gap that is not beyond our abilities to fill.</p>
		53	0	Bowden, Beth Willard	A model for future planning should be based on citizens assemblies, which would decide on and influence the Smartgrowth Strategy.
		54	0	Robson, John	<p>SmartGrowth had failed to obtain the buy-in of their communities for the visions, strategies, plans, costs, analyses, and base assumptions.</p> <p>It was felt that SmartGrowth had failed to consult with the community on transport, UFTI, and other initiatives.</p> <p>It was felt that the consultation on the SmartGrowth Strategy was insufficient.</p> <p>Mr Robson suggested that, in order to avoid another failure, SmartGrowth must lead, listen, and learn from the community.</p>
		57	0	National Council Of Women Tauranga (Ncw)	A more tailored approach to public engagement would enable a greater understanding of the community's concerns and aspirations.

Smartgrowth Strategy 2023 - Summary of Submissions

Topic	Issue	Sub ID	Sub Point	Name	Summary
		69	8	Pirirakau Tribal Authority - Incorporated	27. We do wish to speak to this feedback (submission) with the political panel during the 4-6 December period to provide for an independent working group to contribute to the Proposed SmartGrowth Strategy for review by Pirirakau and Te Puna Heartlands (Community - proposed by the Te Puna Plan jointly with Pirirakau and the Pirirakau Hapu Management Plans 2004, and 2017). This will include hui a hapu and community meetings to provide for actual participation.
		75	3	Andrews, Julie	In terms of feedback, I have found the sheer amount of information and the short period of time allowed for submissions to be overwhelming and offputting. I also found the conflicting numbers, areas and timeframes shown in tables and maps in the Strategy document (mainly to do with growth and intensification), made the process of submitting even more difficult. I think most people in Tauranga and the sub-region are looking for solutions to congestion and sprawl, and many people are extremely concerned about a variety of issues including climate change, cost of living, housing and what high and medium density will mean for them. However, it is unlikely that all but a few will share their views through this submission process. It is simply too big an ask for people who are already stretched time-wise and/or who feel that it is a lot of effort to (a) get their heads around what is proposed; and (b) put in a submission; when it probably won't make a difference to the outcome (because this is what people have experienced in the past). For the Smartgrowth consultation process to be effective there needs to be more involvement at community level - and as the Strategy notes, there are different needs within different communities.
		77	0	SocialLink	Social Link supported the need for genuine community engagement beyond public consultations on strategies and documents. - It was understood that the community engagement teams in respective councils engaged with communities on a project-by-project basis, which was important. However, it was also important to hear the voices of locals, who had strong local networks, understood the local whenua and had some knowledge of council process, providing important different perspectives to inform decisions. - It was noted that decisions improved when there was evident diversity amongst decision makers.
		87	7	Ngai Tukairangi Trust	The Trust wishes to express thanks to [REDACTED] Kai Arahi - Tu Pakari for hosting three workshops in preparation for this submission. As such, feedback was circulated with some of the key points raised. One such point that [REDACTED] made in her collective feedback response that particularly resonated with the trust was this; "If you do not receive much feedback on the draft Strategy from tangata whenua, it could be more of an indication of a lack of capacity rather than a lack of interest or concern" The Trust was significantly pressured to get a submission together that articulately spoke to the 180 page document. We have endeavoured to provide our initial comments as well as reiterate some of the comments from the circulated feedback document that we support.

Smartgrowth Strategy 2023 - Summary of Submissions

Topic	Issue	Sub ID	Sub Point	Name	Summary
		91	1	Sustainable Bop Trust	<p>Hence our primary feedback on this Strategy is that, because of its complexity and its many interrelated parts, we believe it is far more conducive to good policy-making to sit down with a broad range of 'stakeholders' to work through issues in an open and interactive way.</p> <p>We have found this submission process to be the most demanding of any council consultation yet. Writing a comprehensive submission requires a massive commitment of time to analyse the Draft Strategy and background documents - and should be better supported by SmartGrowth partners.</p> <p>Our Trust made the decision to focus on engagement with local community groups and networks, rather than just spend our time reading all the background documents. We did that because the Independent Chair informed us that SmartGrowth did not get a large enough budget to do that engagement itself. In retrospect, that was possibly the wrong decision. Most people did not end up sending in a submission. The feedback we received was that it was too complex and that the survey form was not at all helpful, as it didn't provide any prompts to help people shape their feedback.</p> <p>We imagine this was known up front by councils, so it raises the question as to whether you really wanted to elicit a wide range of people's views? Surely your comms advisors told you that this consultation was not best practice?</p> <p>Why couldn't TCC (and partners) spend as much as it has on promoting the Cameron Rd and Te Manawataki o Te Papa projects to support engagement on the single most important thing to ensure a sustainable sub-region: an overarching, evidence-based sub-regional strategy, based around a sustainable funding strategy and a sustainable low carbon plan for future development?</p> <p>If that wasn't possible, the obvious thing to do when consulting on something this complex is to follow standard council practice:</p> <p>1) Offer a guided written submission process (including multi-choice answers where appropriate) for people who want to share their views but don't have the knowledge of time or writing skills to type up responses for each section.</p> <p>2) Still also offer the comment boxes you did, for people to add any extra wording they wish.</p> <p>3) Run a community engagement session in each part of the sub-region, to get wider feedback and support the needs of people who respond better through group sessions and/or oral language, including many Tangata Whenua, some other ethnic groups, some people with disabilities, and many others who respond better in groups settings where other people bring up ideas and stimulate innovative thinking and shared solutions.</p> <p>Due to the lack of diverse and widespread feedback, we believe there is a real danger that you will end up approving something similar to this Draft Strategy, presumably with some changes made in response to public feedback, but not address some fundamental problems built into this growth strategy.</p> <p>We understand the external time pressures. However, if the goal is to get the best outcomes for our region, it is critically important to get this once-in-a-decade strategy right.</p>

Smartgrowth Strategy 2023 - Summary of Submissions

Topic	Issue	Sub ID	Sub Point	Name	Summary
	6: Editorial changes	82	1	Batchelar, Craig	<p>Strategy reference: Whole Strategy Submission: Any changes required to update on matters, particularly those that are timebound, for example reflecting the decisions made on Proposed Plan Changes 33 and 92. Amendment sought: Any amendments required to update matters in the Strategy that have changed since the document was adopted for consultation, in particular decisions on Proposed Plan Changes 33 and 92 if available.</p> <p>Strategy reference: Whole Strategy Submission: The Strategy and FDS will be approved in 2024 based on updated information. The term of the strategy should reflect this and align with the partner LTP dates. Amendment sought: Retitle to "SmartGrowth Strategy 2024-2074".</p> <p>Strategy reference: Whole Strategy Submission: Any changes required following the completion of Draft Long-Term Plans and the Draft Regional Land Transport Plan that are required to the strategy so that there is good alignment. Amendment sought: Any changes required to align with Long-Term Plans and the Regional Land Transport Plan.</p> <p>Strategy reference: Whole Strategy Submission: There are some inconsistencies in how densities are referred to, including whether these are these are minimum densities or targets and whether they net or gross. These should align to the RPS definition. We strongly encourage higher densities around centres and public transport nodes, and these should be reflected in the densities to achieve the objectives of the strategy. Amendment sought: Clarification throughout.</p> <p>Strategy reference: Whole Strategy Submission: Consistency in wording when the term papakainga is used - sometimes we talk about papakainga on Maori land - but in some cases, it won't be Maori land. Amendment: Ensure that when the Strategy talks about 'papakainga' it is broad enough so that it isn't just limited to Maori land.</p> <p>Strategy reference: Whole Strategy Submission: Minor editorial and grammatical corrections throughout the Strategy. Amendment sought: Minor editorial and grammatical corrections throughout the Strategy.</p> <p>Strategy reference: Foreword Submission: Minor correction to foreword to remove specifically referencing Waka Kotahi as they are part of Central Government. Note that the foreword is likely to be updated for the final version of the Strategy. Amendment sought: and central Government (strikethrough: in particular Waka Kotahi - the New Zealand Transport Agency")</p> <p>Strategy reference: Part 1, Benefits of long-term planning, p 15 Submission: Minor correction - add to the benefits of long term planning. Amendments sought: Add 'efficient use of land' as another beneficial and add 'affordable' to bullet 5.</p>
		82	12	Batchelar, Craig	<p>Submission: Suggested additional information for Western Corridor Amendment sought: Information or placeholders could be added for active mode network (not just Wairoa River connections to Tauriko West).</p> <p>Submission: Text Change given lack of detail around 'active modes' for the New Eastern Centre Amendment sought: "New Eastern Centre" seems misplaced in the active modes section 2035-2054. This should be expanded upon or removed.</p>

Smartgrowth Strategy 2023 - Summary of Submissions

Topic	Issue	Sub ID	Sub Point	Name	Summary
		82	2	Batchelar, Craig	<p>Submission: Additional text for the growth directives relating to transformational shift 2. Amendment sought: Opportunities for papakainga and other Maori-led housing on general land as well as whenua Maori should be included within the growth directive.</p> <p>Submission: The graphics in the bottom right should demonstrate how this has changed over time. This will enhance the Key Housing System Challenges identified on Page 112. Amendment sought: Add to the housing graphic in Figure 5 to show how home ownership has changed over time.</p> <p>Submission: Minor correction to core concepts diagram. Amendment sought: The summary of core concept "Access to opportunity" should specify "15-minute journey time by walk or bike ride..." to be consistent with the content on page 101.</p> <p>Submission: The inclusion of indigenous biodiversity in the paragraph to align with other references throughout the Strategy. Amendment sought: Amend the second sentence of the second paragraph as follows: To develop resilient communities, we need to ensure that reducing exposure and vulnerability to climate hazards, cutting back greenhouse gas emissions and conserving, enhancing, and restoring local ecosystems and indigenous biodiversity are all given the highest priorities in everyday decision making and policies on infrastructure, urban development, housing, and transport.</p> <p>Submission: Minor editorial correction Amendment sought: Amend top lefthand box, first and second bullet points as follows: • TCC Nature and Biodiversity Action &amp; Investment Plan (word 'plan' underlined) • Plan (word 'plan' strikethrough), Climate Change (word 'change' strikethrough) Action &amp; Investment Plan Biodiversity funding programmes (words 'biodiversity funding programmes' strikethrough) • Biodiversity funding programmes (sentence bold and underlined)</p> <p>Submission: Minor editorial correction Amendment sought: Amend middle lefthand box, first bullet point as follows: • Structure plans - Omokoroa; Tauriko West Local spatial plan actions - Te Papa, Otumoetai, Mount Maunganui (strikethrough words 'Local spatial plan actions - Te Papa, Otumoetai, Mount Maunganui') Local spatial plan actions - Te Papa, Otumoetai, Mount to Arataki (sentence bold and underlined)</p>
		82	3	Batchelar, Craig	<p>Submission: The Mangrove Extent 2011 layer is not clear on the map. The layer is shown as red in the key, and red/black on the map. Amendment sought: Amend the Mangrove Extent 2011 layer on the map to a red colour only.</p>
		82	7	Batchelar, Craig	<p>Submission: Minor text change to include intensification. Amendment sought: First paragraph about population increasing faster than in 2021 "this means more land is needed for housing and employment". Suggest re-wording to "more capacity" instead of "more land" to cover both intensification and greenfield growth.</p> <p>Submission: Change to development infrastructure table to remove Tauriko West Spine Road as it is funded by developers. Amendment sought: Tauriko West Spine Road is funded by developers so should be removed</p> <p>Submission: The footnote as currently worded states that all SmartGrowth partners have a strong preference for the Western Corridor transport improvements to be delivered in a single stage and in an earlier timeframe. This should be changed to say that it is the preference of the SmartGrowth council partners and Priority One Amendment sought: Amend footnote 15 as follows: The SmartGrowth council and iwi partners and Priority One have agreed there is a strong preference and need for Western Corridor transport improvements to be delivered in a single stage within a decade (by 2034) as opposed to the proposed staged delivery over many years potentially extending until 2050 given the significance of the corridor locally and nationally.</p>
	7: Smartgrowth partnership	62	7	Envirohub	<p>Representation on the Smartgrowth Leadership Group; Envirohub has noted and supports the inclusion of Priority One, representing the economy, on the SLG. It is equally necessary that the Environment sector and the Social sector also have a seat at the table. A key requirement would be that such representatives have good networks and ongoing connections with their relevant sectors. We ask that that both sectors be included and that this be considered and supported by SLG.</p>

Smartgrowth Strategy 2023 - Summary of Submissions

Topic	Issue	Sub ID	Sub Point	Name	Summary
		65	2	Te Puke Economic Development Group	<p>It is critical that all of our communities have voice and local knowledge is listened to. For many years, a Strategic Partners Forum was successful. It afforded selected interest groups the opportunity to share local aspirations and knowledge, needs based assessments and well thought out ideas. The termination of the Forum was very disappointing and has resulted in a disconnection to industry sectors, communities and local knowledge.</p> <p>We are fully aware that Smart Growth is a planning framework only and approval and implementation processes for growth initiatives sit with the territorial authorities and central government. In our view, the Smart Growth strategy must be connected to communities and interest groups and their local knowledge. We urge you to re establish the strategic partners forum and to listen to an abundance of local knowledge and ideas that will be invaluable in making sure we achieve the positive S's - Strategic, Sustainable, Serviced, Successful and Satisfied.</p>
		65	7	Te Puke Economic Development Group	<p>Over the last decade we had regular engagement with Smart Growth decision makers. We developed strong relationships and we learned a great deal through the strategic partners forum. We have had mixed success in making progress on issues and needs that we identified, but at a minimum we did have engagement and on occasion support to get important things done.</p> <p>More recently, engagement has been terminated. There has been a noticeable shift toward city needs and a prioritisation to Tauranga and it's near west. This is how we see it. Our perception is our reality.</p> <p>Smart Growth is incredibly important. Smart Growth as a body with an overarching approach to enabling progress across all of our subregional communities can be powerful.</p>
		75	4	Andrews, Julie	<p>I know that in the past, Smartgrowth had forums focused on various sectors, including social and environmental. These forums could be re-established, or take on a new form. There are experts in both the social and sustainability sectors who could offer valuable strategic analysis and input as the Strategy continues to develop and a Housing System Plan is formulated. Facilitating this input would require adequate funding as these sectors currently have limited capacity because of funding constraints. These sectors are just as important as the economic sector, as we grapple with climate change, social problems and the growing inequality in society, all of which have a huge impact on the communities in Tauranga and the sub-region.</p>
		82	11	Batchelar, Craig	<p>Submission: Kiwirail should be included in the SmartGrowth partnership leadership and management framework given the long term significance of rail to urban form and transport.</p> <p>Amendment sought: Amend the Agreement and terms of reference for SLG and/or SGIG or other parts of the SG partnership framework to include KiwiRail.</p>



Smartgrowth Strategy 2023 - Summary of Submissions

Topic	Issue	Sub ID	Sub Point	Name	Summary
		82	5	Batchelar, Craig	<p>Submission: Add to the housing sections the work done in the Priority Development Areas. Amendments sought: Additional text to describe work done on the Priority Development Areas.</p> <p>Submission: Minor additional text to clarify statement around challenges for social housing projects. Amendment sought: Bullet 8: Add in "the development economics in the sub-region make it challenging to deliver social housing projects in some instances".</p> <p>Submission: . Bullet 10: Could be enhanced with facts/statistics. Amendment sought: Additional text - add facts/statistics</p> <p>Submission: Minor additional text to emphasise density around centres and public transport hubs. Amendment sought: On growth directive 8, adding "...in existing urban areas and growth areas, including at higher density around centres and public transport hubs"</p> <p>Submission: Add text and graphic on the Hamilton to Tauranga Corridor initiative which has recently been completed. Amendment sought: Add text to the transport section of the Strategy to describe the Hamilton to Tauranga Corridor initiative. Consider including the graphic.</p>
		91	11	Sustainable Bop Trust	<p>The Need for Local Community Voices</p> <p>All Tauranga and Western BOP communities should have a voice in how we plan for future growth. There is an immense amount of local knowledge and it needs to be listened to by decision-makers. Instead of scrapping the SmartGrowth Forums, the Strategic Partners' Forum should have had an increased role at this crucial time and there should have been investment into community engagement to gather people's aspirations, criticisms, and recommendations for our sub-region.</p> <p>The explanation that the Forums were ended because "we are in an implementation phase" was misleading. We are always in an implementation phase. Now, more than ever, we are also in a planning phase and we needed those voices in 2022 and 2023 to ensure a robust, evidence-based Strategy. Yet that was precisely when SmartGrowth terminated the Forums!</p> <p>We have nationally recognised sustainability experts who live and/or work in Tauranga-WBOP and who are willing to invest time into supporting a more sustainable region. Yet these people are largely ignored.</p> <p>We strongly urge you to re-establish the Strategic Partners' Forum ASAP and to tap into the immense local knowledge that can help to guide you towards a genuinely sustainable Strategy - one that is more financially, economically, socially and environmentally sustainable.</p> <p>Equally importantly, we urge you to add representation from Social wellbeing and Environmental wellbeing onto the SmartGrowth Leadership Growth and Senior Management Group, to balance and complement the Economic representation on those groups. We also note that this representation needs to be representative of the broader community views, and not representing the views of any one organisation.</p> <p>Along those lines, we also note that the recent appointment of Priority One does not fit that mandate, as we do not believe that organisations that primarily service their membership should be representatives on public planning bodies. We note Te Puke EDG is also an important economic body in the sub-region. More importantly, the representatives should represent the views of the wider community.</p> <p>Those comments in are no way intended to convey any criticism about any organisation/s themselves, but to critique the rationale for selecting representatives onto the SLG and SMG.</p>

**SmartGrowth Strategy Submission Hearing**

**DATE:** Monday, 4 December 2023, 9:00am

**HELD:** Council Chambers

**TOPICS:** SmartGrowth Strategy Submissions

**PANEL MEMBERS** Andrew Turner (Independent Chair – SmartGrowth) (Chairperson)  
Bill Wasley (Tauranga City Council)  
Paula Thompson (Bay of Plenty Regional Council)  
John Scrimgeour (Western Bay of Plenty District Council)  
John McDonald (Central Government Representative)  
Matire Duncan (Tangata Whenua Representative)

**APOLOGIES** An apology from Bill Wasley for early departure was received.

**DECLARATION OF INTEREST** Bill Wasley – daughter and son-in-law have a lifestyle property in Gasson Lane.  
Matire Duncan – On sub-committee Nga Pōtiki a Tamapahore Trust and whānau land is Tumu Kaituna 14 Trust.

**STAFF IN ATTENDANCE:** Craig Batchelar (SmartGrowth Advisor) Nichola Lennard (SmartGrowth Advisor), Elva Conroy (SmartGrowth Tu Pakari Advisor), Te Pio Kawe (SmartGrowth Tu Pakari Advisor) and for Western Bay of Plenty District Council: E Watton (Strategic Policy and Programme Director), G Golding (Governance Manager), T Miller (Strategic Advisor Resource Management), J Osborne (Governance Advisor) and R Leahy (Governance Advisor)

**VIA ZOOM** S Cuers (Strategic Housing Programme Lead), R Gallagher (Senior Policy Analyst), K Lawton (Infrastructure Planner)

SmartGrowth Submissions Hearings – 4 December 2023

**OTHERS IN  
ATTENDANCE IN  
CHAMBERS AND VIA  
ZOOM:**

Submitters as listed in the notes.

**INTRODUCTION:**

**SmartGrowth Submissions**

**Submission 88 – Aaron Collier on behalf of JWL Investment Trust**

Mr Collier, a Consultant, was in attendance to speak to JWL Investment Trust's submission. The Trust are the predominate owners of the Gate Pa Centre, which is in the centre of the area earmarked for intensification.

- JWL Investment Trust was concerned with the inconsistency of the spatial planning for that area. Gate Pa was classified as a town centre under the spatial plan, however, in the draft strategy Gate Pa has been left out on the list of town centres.
- The submitter requested that Gate Pa be considered on the list of town centres in the strategy. It was important that Gate Pa was included as a town centre for future investment decisions.

Mr Collier responded to pātai as follows:

- Gate Pa was originally set as a large format centre between 2010-12, prior to the consideration of residential intensification in that area. National Planning Standards provide consistency in planning issues.
- There is a difference between how centres were developed in Tauranga compared to other cities such as Hamilton.

SmartGrowth Submissions Hearings – 4 December 2023

**Submission 86 – Tui Henry on behalf of Ngāi Tukairangi Hapū Trust**

Ms Henry, was in attendance to speak to the Ngāi Tukairangi Hapū Trust's submission, which focussed on four key areas of significance: climate resilience, marae centres and housing, traffic management and a funding proposal.

- SmartGrowth should build an emergency water system and introduce a programme to plant more native trees to build climate resilience and mitigate coastal erosion.
- The establishment of a Māori Health clinic in Matapihi to help improve outcomes for Māori should be investigated.
- Satisfactory traffic management included the safety and efficiency of shared pathways.
- A funding proposal of \$250,000 towards the Ngāi Tukairangi Hapū Trust was presented to the panel.

Ms Henry responded to pātai as follows:

- Waka Kotahi had engaged with the hapū on their projects.
- The hapū management plan needed to be reviewed the proposed funding would assist with the review.
- SmartGrowth should collaborate and adequately resource the hapū to assist with the implementation of the strategy.

**Submission 87 – Lorin Waetford on behalf of Ngāi Tukairangi Ahu Whenua Trust**

Ms Waetford, a Policy Analyst, was in attendance to speak to the Ngāi Tukairangi Ahu Whenua Trust submission, which focussed on the Matapihi Land Use Plan and Mount to Arataki Spatial Plan, the allocation of freshwater, highly productive land and property development opportunities.

- The Strategy would be affected by new Central Government policies.
- The Trust was supportive of an updated Matapihi Land Use Plan, however, was concerned that the Tangata Whenua Spatial Plan was not completed in time for the SmartGrowth Strategy Hearing.
- Proper management of freshwater resources was necessary during a period of climate change. The SmartGrowth Strategy should ensure that the freshwater allocation and use would not be affected by urban growth.

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- The emphasis on highly productive land could not be overstated. There could be detrimental impacts on food production if highly productive land was rezoned for residential or commercial use.
- The Trust's main commercial operations were horticulture; however, the Trust would like to identify opportunities for commercial property development for the shareholders and community.

Ms Waetford responded to pātai as follows:

- Ms Waetford had attended several stakeholder hui on waters reform. There was an onslaught of reforms in the waters space.
- The existing Māori land trusts share resources and collaborate, however, a formalised process or forum supported by Council would enable a cultural lens in decision making processes.
- The draft Strategy focuses too much on residents looking to move to the Tauranga area, rather than addressing the needs of existing communities.

**Submission 72 – Shae Crossan and Spencer Webster on behalf of Ngā Pōtiki ā Tamapahore Trust**

Mr Crossan and Mr Webster were in attendance to speak to the Ngā Pōtiki ā Tamapahore Trust submission, The Trust are one of the largest landowners in Western Bay of Plenty and Tauranga.

- Most of their land is Māori freehold land, Māori customary land. The Trust also have a general land development project in Papamoa.
- The Trust has a pilot scheme to remove former Kāinga Ora stock to put on Māori freehold land, however, there are issues with zoning in relation to minimum site sizes. To facilitate more Māori development projects, the zoning rules need to be changed.
- The Trust would like to see the Tara Road land block included in the Future Development Strategy. The block yield has been estimated of around 600 sections. There are some geotechnical constraints with the land which would be addressed. The land has existing access to Tara Road and proximity to the Eastern Link and Rangiuru Business Park.

Mr Webster and Mr Crossan responded to pātai as follows:

- The National Hazard Maps do not exclude the Tara Road block, it is identified as an area that should be treated with caution. The Trust requested that the block be identified as an area for growth in the future development strategy maps.
- Stormwater modelling on the Tara Road land block will be undertaken regardless of whether the area is included in the Strategy or not.

**Submission 69 & 53 – Julie Shepherd (Pirirākau Tribal Authority Incorporated) and Beth Bowden**

Ms Shepherd and Ms Bowden were in attendance to speak to their submissions.

- The submitters were supportive of Te Puna being left as a 'green wedge' in the region.
- There has been little energy given to the planning of SmartGrowth for the future. Pirirākau is active in the resource management space.
- There was pepper potting of rural and residential zoning, determined at a Council level.
- Pirirākau was not across all the potential development and rezoning in the rohe. A large population of Pirirākau still live in the rohe, they want a level of planning and security to prevent displacement in the future.
- A model for future planning should be based on citizens assemblies, which would decide on and influence the SmartGrowth Strategy.
- State Highway 2 and Clarke Road should be zoned rural-residential.
- The decline in kaimoana was caused by poor water management discharge created through development pathways. The Takitimu North Link could greatly reduce water quality in the area.
- The Strategy should account for and support ecological biodiversity. Inclusionary zoning should be included to create dynamic environments for society.

Ms Bowden and Ms Shepherd responded to pātai as follows:

SmartGrowth Submissions Hearings – 4 December 2023

- The United Kingdom uses citizens assemblies on planning issues. The electoral role and volunteers could be used to form the assembly. Participants would complete a two-day programme where they would be provided information from experts and the participants views would be gathered for consideration by planners.
- The Tangata Whenua spatial planning exercise could be improved if the people involved facilitating those exercises had greater freedom to work with iwi.
- Citizens assemblies may create more litigation when not done correctly. However, pushback from the community generally occurred through a lack of consultation and engagement.

Hearing adjourned at 10:37am and resumed at 10:45am.

**Submission 92 – Vincent Murphy**

Mr Murphy, a Planning Consultant, was in attendance to speak to his submission:

- There could be more spatial provision in the Pongakawa area for housing. The demand and allocation for residential housing in that area is growing quicker than what is predicted, the growth allocations in the Strategy should be updated to reflect this.
- The Strategy should allow for development of the area between Papamoa and Welcome Bay. This would enable Tauranga City to be consolidated rather than expanded out.
- There should be direction or further provision in the Strategy for 'in principle support' for residential development for plan changes in areas identified for potential growth.

**Mr Murphy responded to pātai as follows:**

- The market is not delivering enough housing in the Pongakawa area, a targeted overlay in the area to indicate it is a growth area could encourage development.
- A broad overlay or spatial indication should be provided in the Papamoa-Welcome Bay area to enable developers to investigate if it is appropriate for development.

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**Submission 67 – Jeff Fletcher on behalf of Ford Land Holdings**

Jeff Fletcher (supported by Colin Bennett, Scott Adams, Jeff Ford, Malcolm Short, Emily Rota-Bidois and Geoffrey Rice) was in attendance to speak to the Ford Land Holdings submission, which focussed on the proposed Te Tumu development.

- The draft Strategy identified Te Tumu as being an area for long-term growth, the submitters requested it be classified as medium-term.
- The landowners are currently working with Tauranga City Council on a Plan Change for this development. The infrastructure in this area should align with the time frame.
- Te Tumu was not fragmented by different landowners and has been identified as a climate resilient area. The development would create a 15-minute neighbourhood. 57 hectares would be set aside for employment generation. There have been areas set aside for archaeological and cultural protection.
- The Papamoa East interchange and the Kaituna stormwater overflow are needed to enable the Te Tumu development.
- The land in Te Tumu had been identified as future urban for more than 20 years.
- The Kaituna Link was removed in the SmartGrowth strategy; the submitters requested this be reinstated.
- There was no certainty from Tauranga City Council on whether the Plan Change would go ahead or not. The panel would seek advice on Tauranga City Council's position and timing on the proposed Plan Change.
- Te Tumu was a large project that would help address the housing needs in the area. Building infrastructure today was cheaper than building it in the future.

**Submission 49 – Don Thwaites**

Don Thwaites was in attendance to speak to his submission, which focussed on industrial land zoning and supply.

- Apata was one of the slowest growth areas for horticultural development, there was a parcel of land there that could be used for industrial land use. It was disappointing that Apata was rejected for residential and industrial land zoning.

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- Apata was on key transport routes (State Highway 2 and rail) and only 22 kilometres from Tauranga Container Port once Takitimu North Link was built.

**Submission 78 – Mike Sharp on behalf of Tauranga Moana Fumigant Action and Clear the Air**

Mr Sharp was in attendance to speak to the Tauranga Moana Fumigant Action and Clear the Air groups. The submission highlighted the importance of managing industrial emissions.

- There was a need to designate heavy industrial areas so that harmful emissions from those activities can be properly managed.
- Planning and zoning provisions for heavy industrial should align with national air quality standards.
- Recent medical studies showed proximity to industrial activities can have a serious impact on people's health.
- Heavy industrial business should be relocated away from Mount Maunganui if it was feasible.

**Submission 65 – Mark Boyle on behalf of Te Puke Economic Development Group**

Mr Boyle (supported by Paul Hickson and Sue Matthews) were in attendance to speak to the Te Puke Economic Development group submission.

- Te Puke has 6000 hectares of kiwifruit orchards, combined with other industries the area provides more than \$2 billion of GDP.
- All of the communities in the Western Bay sub-region should have voice and local knowledge that is listened to. In previous years there was a strategic partners forum where the community could share knowledge and aspirations. SmartGrowth should re-establish the strategic partners forum.

- Housing was critical to the needs and aspirations of Te Puke. There was a vision for a 15,000 plus settlement east of Te Puke, however, there was a need to stimulate growth in the immediate Te Puke area. There should be a hamlet type approach with Te Puke being the hub with other settlements nearby.
- New industrial land should be made available in the immediate vicinity of the Te Puke township.

Mr Boyle responded to pātai as follows:

- There was an opportunity for industrial development in Te Puke, however, the consent was rejected by Regional Council as the land near a flood zone area.
- Sustainable growth ensured that the planting of kiwifruit was in line with international markets and the capability to provide workforce and housing was in sync.
- The previous strategic partners forum was successful and chaired by an independent Chair.

**12.24pm** The hearing adjourned.

**1.02pm** The hearing reconvened.

**Submission No.81 – The Urban Taskforce for Tauranga – Aaron Collier**

Mr Collier was in attendance, on behalf of The Urban Taskforce for Tauranga (UTF), to speak to the Panel on its submission, and was supported by the Vice Chairpersons of UTF – Adam Ross and Omea Willows. Further information was provided as follows:

- UTF advocated for actions and delivery.
- Tauranga City Council (TCC) was a 'Tier One' Council; however, it was believed that TCC was the worst performing Council in the country.
- The UTF's purpose was to foster a true partnership between the SmartGrowth Local Government partners, to work in an aligned manner.

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- There needed to be provisions for sufficient development capacity over the next 30 years to meet expected demand.
- It was not as important to develop a commercial hierarchy, but to look at what the appropriate commercial centres may be (considering what is fit for purpose depending on the land area).
- Regarding the Industrial Business Land Assessment, it was believed that there were no issues with identifying further land within the eastern/central corridor, where it would be well serviced.
- There needed to be a coordinated approach between the development community, the Bay of Plenty Regional Council, and district councils for the Industrial Strategy Review.
- It was believed that SmartGrowth should work towards shortening the lengthy lead time into development, by including actions such as sufficiently resourcing district councils to enable land changes and Resource Consent processes to progress quicker.

The submitters responded to questions from the Panel as follows:

- The submitters were aware of the views of Pirirakau, and it had been identified that there was a transformation within the strategy on the treatment of marae. This transformation was supported by the submitters, and it was suggested by the Panel that UTF engage with the whānau in Te Puna and Whakamārama.
- All partners engaged in a Future Development Strategy (FDS) should be aligned, and without disagreement. All partners should be onboard with the identified sites.
- There had been significant re-litigation from partners in past plan changes and Resource Management Act (RMA) processes.
- Social infrastructure should be considered on a sub-regional basis rather than an individual territorial basis.
- In the view of UTF, the National Policy Statement – Urban Development (NPS-UD) did not provide enough basis/direction for engagement by the partnership, with the development community.
- The UTF had proposed to set up a Development Sector Group (DSG), made up of representative from that sector, that sat on the SmartGrowth Panel. This would bring the developer's experience and assistance in processes (such as feasibility assessments), to the SmartGrowth table.
- There was an under-investment of social infrastructure, such as sub-regional approaches to facilities such as sports fields, open spaces, and museums. There needed to be actions and guidance for the partners on this approach.

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- It was believed that SmartGrowth had achieved some positive outcomes, but there needed to be improvements to residential land delivery and supply.
- A suggestion for improving the funding model was to engage with willing private developers to help in this space, and it was believed that councils should not take full responsibility for funding.

**Submission No.83 – Bell Road Limited Partnership – Aaron Collier**

Mr Collier was in attendance on behalf of Bell Road Limited Partnership (BRLP), to speak to the Panel on its submission, and was supported by Nathan York (Bluehaven Group Chief Executive Officer), Peter Moodie (Director, Lysaght Consultants), and Ben O'Loughlin (Senior Engineering Geologist, ENGEO). Further information was provided as follows:

- The Bell Road Limited Partnership (BRLP) site was approximately 120 hectares and in single ownership, which was a key driver for the submission.
- The submission represented the owner of this 130ha site, as well as the landowner of the additional 217ha in the adjacent property (Hurst site).
- It was important for the Panel to observe the ability of willing developers who have the resources to deliver this development.
- It was believed there were shortfalls in the SmartGrowth land supply, in both residential and employment. However, with the right planning framework in place, BRLP could deliver the shortfall to the SmartGrowth community.
- One of the key aspects was the cost of land, and the raw cost of land (particularly for gold kiwifruit land) was \$1.6 million per hectare. Valuations indicated that this would climb in the future.
- Fundamentally, high-cost land could not be feasibly developed to another land use, and it was believed that the implication of this was not fully appreciated in the Aurecon and Phizacklea reports.
- There was concern that the land cost analysis did not appear to be fully understood.

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- The Bell Road assessment scored the second highest weighted score in terms of the Aurecon report, however, neither Te Puna nor the Bell Road area were selected as preferred locations. It was not understood how this had occurred.
- There was concern in the lack of detail applied to identify the three preferred locations in the Phizacklea report, and it was believed that strategic location should have been weighted higher.
- The Bell Road area had access to an existing community of both residents and employees, and had the ability to connect to this community.
- The BRLP site aligned with the UFTI Connected Centres Strategy, as it could be connected to both the Wairakei Town Centre ('The Sands') and Te Puke township.
- The site was 20 kilometres from the Port of Tauranga, which was closer than the current preferred sites.

Further information provided by Mr Moodie in relation to stormwater engineering:

- A key component was that DHI should be engaged to utilize BOPRC 1% event flood model for the Bell Road Catchment. A preliminary model had been provided for the existing scenario, to determine the impact on the adjacent properties. This model determined that there was approximately 20-100mL of increased flooding to the west of the site, and 150mL to the south of the site.
- A civil design software was used, and it was determined that this resulted in 1 million cubes of displaced water in this catchment.
- The engineering analysis allowed for half-a-metre freeboard from the flood level to the minimum platform level, settlement allowance due to preloading, earthquake creep settlement, stormwater detention and displacement storage, and 2% of catchment wetland located within a stormwater management area (SMA), to provide treatment to the development.
- It was assumed that there would be two stormwater management areas.
- It was determined that, by providing a SMA, the water level in the SMA could be raised higher than the flood plane on the outside, and the displaced cubes could be offset within the development, resulting in 100 hectares of developable land in the BLRP site, and 50 hectares in the Hurst site.
- The discharge from the SMA could be a combination of discharging water back into the Bell Road Drain or into the Kaituna River.

Further information provided by Mr Moodie in relation to wastewater engineering:

- There were several solutions that were believed to be viable, including:
  - Connecting to existing underpass and into the Wairakei network;
  - Connecting to the Te Puke Wastewater Treatment Plant; or
  - Provision of onsite treatment and disposal.

Further information provided by Mr Moodie in relation to water supply engineering:

- The Waiāri Water Supply Scheme ran adjacent to the property, and there was potential to connect to this, as well as a potential to upgrade the existing water mains on Bell Road.

**1:45pm** Commissioner Bill Wasley left the hearing.

Further information provided by Mr O'Loughlin in relation to geotechnical engineering:

- Preliminary geotechnical assessment had been completed of the proposed landform, and recommendations were provided to inform the development considerations.
- Majority of the site was underlain by 2-3 metres of organic peat.
- Groundwater was located between 0.5-1 metre below ground surface.
- The proposed earthworks would create settlement of the peat, and additional fill would be added to accelerate the settlements and to minimise long-term settlement risks. This process was expected to take 1-2 years before development could occur.

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- The underlying sand was expected to liquify during a large earthquake, which was consistent with most of the Pāpāmoa region. However, the thick crust of engineered fill that was proposed to be placed (6-8 metres) meant that any liquification would be minor and manageable.
- The 2011 SmartGrowth Tsunami modelling indicated that the Pāpāmoa shoreline would be inundated by a 12-metre tsunami if the Kermadec Trench were to rupture. The BRLP site would be raised above these modelled inundation levels.
- Based on the preliminary analysis, it was believed that the geotechnical constraints could be addressed to allow for development of the site.

Mr Collier provided further information as follows:

- He was satisfied that, based on the engineering and geotechnical evidence, there were no ground engineering, storm/natural hazard, or infrastructure constraints that could not be addressed at the time of rezoning.
- A stormwater solution for the site had been confirmed through the engineering evidence.
- The land development costs were low, which allowed more effort to be applied to filling the land.
- There would need to be a process, as set out under Policy 3.6 of the National Policy Statement – Highly Productive Land (NPS-HPL), for the site to be considered through the Regional Policy Statement (RPS) process.
- It was believed that the proposal was consistent with Te Mana o te Wai.

The submitters responded to questions as follows:

- The Aurecon report rated the BRLP site highly, while the Phizacklea report excluded the site, resulting in significantly more evidence required by the submitter.
- The displaced water would be spread across both Bell Road properties but would be accommodated within the development.
- The tsunami requirement was 2 metres in height, and the development was proposed to exceed that.
- The top three preferred sites in the Aurecon report were not the top three sites in the Phizacklea report.

**Action:** That staff clarify the recommendation within the Aurecon report, as shown in item 4.3 of Aaron Collier's evidence.

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**Submission No.91 – Sustainable Bay of Plenty Trust – Glen Crowther**

Mr Crowther was in attendance, on behalf of Sustainable Bay of Plenty Trust, to speak to the Panel on its submission. Further information was provided as follows:

- The key observation was that there seemed to be two growth strategies – the official draft SmartGrowth Strategy, and a second strategy being considered by Tauranga City Council (TCC) Commissioners in public meetings.
- There was concern about the lack of consistency between these two strategies, as highlighted in Mr Crowther's submission, and there was a view amongst stakeholders that this situation was a 'strawman'.
- It was believed there was less 'live, learn, work, and play' in Tauranga than ever before, however, improvements in this space needed to meet the needs of the community and be community driven.
- A fundamental issue was the lack of public consultation on UFTI and the transport system plan, and there was a lack of understanding as to why a flawed model was still providing the connections within the Connected Centres.
- As there were now no SmartGrowth Forums, it was believed that there was less opportunity to hear concerns of the public.
- The SmartGrowth Leadership Group (SGLG) and Senior Management Group (SMG) both had economic representation, but there was no environmental and wellbeing representation.
- It was believed that there should be a 'Wellbeing Forum', which represented a broader community view from across the region.
- It seemed that growth had not and would not pay for growth, and the fundamental issue of funding needed to be addressed.
- There had been a study undertaken on the feasibility of a sub-regional ferry service, however, there had not been a study done on the feasibility of passenger rail.
- There was concern around the use of sustainability terminology within the SmartGrowth Strategy, and sustainability trade-offs needed to be confronted within the Strategy.

The submitter responded to questions as follows:

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- Fundamentally, sustainable growth considered the impact of vehicles on the road, and the allowance of access to a growth area without the use of a motor vehicle. It also considered the building of growth around natural export advantage, access to rail and low carbon transport, as well as existing infrastructure.

**Submission No.61 – Child Poverty Action Group – David Riley**

Mr Riley was in attendance, on behalf of Child Poverty Action Group, to speak to the Panel on its submission. Further information was provided as follows:

- It was believed that the SmartGrowth Strategy did not provide a blueprint that would improve life for our tamariki.
- A study in Katikati showed that the area may not have a shortage of family homes, however, there were many elderly people living in large family homes who had no options for relocation. These homes could be better utilised for a family.
- It was felt that rural children outside of the connected centres were significantly disadvantaged, due to lack of services such as bus services and insufficient internet connection.
- The SmartGrowth Strategy outlined how the region was a 'nice place to live', however, this was not true for the less fortunate who struggled to afford food and warm, dry housing.
- A study from Victoria University in Wellington proposed a solution to the funding crisis faced by Local Government, being a higher local body charge for the wealthy. Mr Riley proposed that new houses needed to stop being built by concreting over nature, as greenfield urban developments negatively impacted the environment, and for most councils, it was an economic disaster.
- Although councils recouped some costs from developers through financial contributions, the immense costs of providing new roads and infrastructure to greenfield sites could never be fully recovered. However, densification of city centres required very little investment in existing infrastructure.

**2.27pm** The hearing adjourned.

**2.45pm** The hearing reconvened.

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**Submission No.42 – Carole Gordon (MNZM)**

Ms Gordon (MNZM) was in attendance to speak to the Panel on her submission. She spoke to a PowerPoint presentation (**Tabled Item – Presentation – Submission No. 42**), which outlined the below:

- Building our Futures Together?;
- A Challenge to Growth Agenda;
- Age Distribution of the Population, based on the Median Projection, Years Ended June 1953-2073 – Graph;
- Dwellings Built by Decade – Graph;
- Estimated and Projected Population in Tauranga City, New Zealand – Graph;
- Estimated and Projected Population in the Western Bay of Plenty District, New Zealand – Graph;
- Social Cohesion Matters;
- SmartGrowth Report by the New Zealand Institute of Economic Research (NZIER) 2022;
- Longevity is a New Horizon;
- Doing Things Differently; and
- UN Decade of Healthy Ageing 2021-2030.

The presenter provided further information, and responded to questions, as follows:

- Ms Gordon paid tribute to the late Jo Gravit, and her dedication to affordable housing and contributions to SmartGrowth over the years.
- There needed to be considerations to the social impact of the future.
- Prior to UFTI, there was a strong SmartGrowth review, which had a focus on liveable communities. There needed to be respect for Te Ao Māori values of whanaungatanga ('togetherness'), and to allow this to guide us.
- It was believed that the Transformational Shifts on page 18 of the SmartGrowth Strategy omitted three vitally significant structural planning items, being:
  - Responding to the demographic transformation;
  - Developing sustainable, hyper-local communities; and
  - The intergenerational cost of growth assumptions.

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- A crucial demographic factor was the shift of the population into an aging population from 2025 onwards.
- It was suggested that a graph similar to the 'Dwellings Built by Decade' graph in the PowerPoint be created for the SmartGrowth period.
- Pasifika elders were the most vulnerable in New Zealand, due to current housing conditions and lack of housing for large families, followed closely by Māori.
- The key concern was that the Western Bay of Plenty sub-region had an elder housing and an elder care crisis. The solution for this was to have caring, hyper-local communities to care for these elders.

**Action:** That SmartGrowth collaborate with the Tauawhi Kaumatua Tauranga Moana Decade Forum on its key project: Homes for an Ageing Population.

**3.00pm** Commissioner Bill Wasley entered the hearing.

**Submission No.48 – Tauranga Business Chamber – Matt Cowley**

Mr Cowley was in attendance, on behalf of Tauranga Business Chamber, to speak to the Panel on its submission. Further information was provided as follows:

- The Tauranga Business Chamber (TBC) also covered the Western Bay of Plenty District area.
- The TBC supported SmartGrowth, as it gave direction for businesses to start making strategic direction decisions for the 10–20 year horizon.
- It was believed that the challenges with SmartGrowth were not in the planning and decision making, but in the implementation/delivery.
- It was believed that goals related to transport could be difficult to achieve or implement, due to disjointed or disconnected agencies, and having aspirational targets that were not fully explained to the community.
- A wide variety of different industries were wanting to retain their people; however, it was recognised that Tauranga and the Western Bay of Plenty were largely becoming less competitive, due to rising costs and inflation.

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- It was predicted that there would be another housing boom within the next 24 months, and there needed to be preparation for this.
- There was a need to acknowledge that, due to supply and housing constraints, most of Tauranga's workforce would be living in Waikato and commuting in the future.

The submitter responded to questions as follows:

- From the perspective of the wider business community, it was more about the progress and outcomes in Local Government, than the delivery of these outputs.
- Generally, the governance of SmartGrowth was trusted, however, additional information could be beneficial if issues arose with coordination and transparency.

#### **Submission No.80 – Paul Hickson**

Mr Hickson was in attendance to speak to the Panel on his submission. Further information was provided as follows:

- It was believed that the SmartGrowth Strategy placed too much focus on Tauranga City and Tauriko, and not enough on other areas.
- Mr Hickson gave a brief overview of his 2004 and 2006 past SmartGrowth submissions, and his updated 2023 perspective, as included in his submission.

The submitter responded to questions as follows:

- It was believed that there did not need to be planned circles 'drawn' around future growth areas.
- The 'Kiwi lifestyle' should not be forgotten and should be appreciated in future planning.

#### **Submission No.89 – Transpower New Zealand**

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Rebecca Eng (Technical Lead Policy – Transpower Environmental Regulatory Team) and David Strang (Transpower System Development Manager) were in attendance, on behalf of Transpower New Zealand, to speak to the Panel on its submission. Further information was provided as follows:

- Transpower was generally supportive of the approach drafted within the Future Development Strategies (FDSs), however, there were some suggested amendments within the three key areas related to the requirements for FDSs under the National Policy Statement on Urban Development 2020 (NPS-UD). These were outlined in Transpower's submission.
- The National Policy Statement on Electricity Transmission (NPS-ET) directly informed the preparation of the FDS, in terms of enabling the operation, maintenance, upgrading, and development of the National Policy Statements (NPS), as well as correctly referencing it as a constraint development where the existing grid was located.
- Ms Eng noted that she was willing to work with staff and officers to provide more specific text to assist any decisions on Transpower's submission.

#### **Submission No.47 – Julian Fitter**

Julian Fitter was in attendance to speak to the Panel on his submission. Further information was provided as follows:

- The environment needed to be the key factor for decisions relating to development.
- Having an unhealthy environment was negative for everybody, not just those directly involved.
- There needed to be a focus on well-built, sustainable housing.
- It was believed that the transport in Tauranga City was not fit for purpose, and this needed to be a focus point for SmartGrowth.
- The economy depended on the wellbeing of the environment, and this needed to be considered as the economy grew.
- There needed to be a better mechanism for involving the community, rather than just allowing for submissions.

The submitter responded to questions as follows:

- Higher density housing seemed to result in more affordable housing, however, any proposed housing and transport policies needed to align with one-another.

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**Action:** Investigate why the top priority for Urban Form and Transport Initiative (UFTI) was not adopted, and report back to the Panel.

**Submission No.5 – Wayne Goodley**

Mr Goodley was not in attendance to speak to his submission.

**Submission No.54 – John Robson**

John Robson was in attendance to speak to the Panel on his submission. Further information was provided as follows:

- Mr Robson stated his support for a large number of the submissions, including Sustainable Bay of Plenty Charitable Trust, Beth Bowden, Carole Gordon, Combined Tangata Whenua Forum, Child Poverty Action Group, Classic Developments, Te Puke Economic Development Group (EDG), and Pirirakau.
- It was believed that ‘outcome metrics’ showed that SmartGrowth was an ‘expensive failure’, for the people and Papatūānuku (the land).
- He believed that the ongoing failure of SmartGrowth was due to two reasons:
  - The strategic framework and operating of environment created by Central Government made economic and environmental sustainability in the subregion impossible to deliver.
  - SmartGrowth leadership refused to stand up to Central Government.
- SmartGrowth had failed to obtain the buy-in of their communities for the visions, strategies, plans, costs, analyses, and base assumptions.
- It was felt that SmartGrowth had failed to consult with the community on transport, UFTI, and other initiatives.
- It was felt that the consultation on the SmartGrowth Strategy was insufficient.
- Mr Robson suggested that, in order to avoid another failure, SmartGrowth must lead, listen, and learn from the community.

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- Within some submissions, base assumptions and analyses had been challenged, and there were noticed inconsistencies between the positions of SmartGrowth and Tauranga City Council (TCC).
- It was felt that SmartGrowth was not able to achieve what it was hoping to achieve, without a clear budget.
- If honest conversations were had with the community and Central Government, and if the framework changed, SmartGrowth may be able to deliver an economically and environmentally sustainable strategy.

**Submission No.63 – Landsdale Development Ltd – Andrew Collins**

Andrew Collins was in attendance, on behalf of Landsdale Development Ltd, to speak to the Panel on its submission. He spoke to a PowerPoint presentation **(Tabled Item – Presentation – Submission No. 63)**, which outlined the below:

- Map of Upper Ohauti Road land (eastern block and western block);
- Future Development Strategy – Staging Map (Map 18);
- Key Points;
- Outline Development Plan (Plan A);
- Key points (continued);
- Upper Ohauti Public Transport Map; and
- Conclusion.

The presenter provided further information, and responded to questions, as follows:

- The first homes in the development would be built in 2027.
- The plans that Mr Collins had described to the Panel were being funded by the developer, and the developers were ensuring that no corners would be cut.
- As part of the development, it was proposed that Upper Ohauti Road would be upgraded through to the southern boundary.

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The hearing adjourned at 4.12pm, to be reconvened at 9.15am, Tuesday 5 December 2023.

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**SmartGrowth Strategy Submission Hearing**

<b>DATE:</b>	Tuesday, 5 December 2023, 9:15am
<b>HELD:</b>	Council Chambers
<b>TOPICS:</b>	Strategy submissions
<b>COMMITTEE MEMBERS PRESENT:</b>	Andrew Turner (Independent Chair – SmartGrowth) (Chairperson) Bill Wasley (Tauranga City Council) Paula Thompson (Bay of Plenty Regional Council) John Scrimgeour (Western Bay of Plenty District Council) John McDonald (Central Government Representative) Matire Duncan (Tangata Whenua Representative)
<b>APOLOGIES RECEIVED:</b>	Nil
<b>STAFF IN ATTENDANCE:</b>	Craig Batchelar (SmartGrowth Advisor) Nichola Lennard (SmartGrowth Advisor), Elva Conroy (SmartGrowth Tu Pakari Advisor) Te Pio Kawe (SmartGrowth Tu Pakari Advisor) and for Western Bay of Plenty District Council: E Watton (Strategic Policy and Planning Programme Director), G Golding (Governance Manager), T Miller (Strategic Advisor Resource Management), P Osborne (Senior Governance Advisor) and C Irvin (Senior Governance Advisor)
<b>VIA ZOOM</b>	Mr Mark Arbuthnot (Director, Bentley & Co. Ltd), Kirsty Dibley (Legal Counsel for Tauranga Crossing Limited (Russell McVeagh)) and Greg Akehurst (Director, Market Economics Ltd).
<b>OTHERS IN ATTENDANCE IN</b>	Submitters as listed in the notes.

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**CHAMBERS AND VIA  
ZOOM:**

**INTRODUCTION:**

- 9.15am The Chairperson reconvened the hearing from the previous day at 9.15 and immediately adjourned the meeting due to traffic congestion delays until 9.25.
- 9.25am The workshop reconvened.

**SmartGrowth Submissions**

**Submission No.79 – Land Play Limited – Upper Ohauiti Landowner Group**

Mr Carl Salmons (Director, Land Play and Maven Consulting):

- Mr Salmons introduced himself to the Committee, provided an overview of his work history and the services that Land Play Limited and Maven Consulting supplied, and advised he was in attendance on behalf of the Upper Ohauiti Landowner Group.
- He advised there were four documents provided in their submission which included a conceptual master plan and a detailed map of the land holdings.
- Mr Salmons then read his submission.

Mr Chris Thompson (Ohauiti Landowner):

- Mr Thompson was an Ohauiti landowner who had moved to the area in 2013 from urban Auckland which was a deliberate move to Ohauiti for a country lifestyle that was also close to the city.
- Mr Thompson's submission was in support of lifestyle blocks as a lifestyle choice.

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- The WBOPDC District Plan rural chapter said ‘the majority of people who live in the Western Bay had chosen to live in the rural area because of the lifestyle opportunities this provides and the proximity to urban employment opportunities’. The District Plan also said ‘demand for lifestyle development in rural areas would be ongoing’.
- It was acknowledged that Council had a significant housing shortfall and was trying to provide as much residential housing for the area as possible in various regions of the Western Bay. However, it is important to remember that the majority of people lived rurally, and the demand was forecast to be ongoing.
- Currently, Ohauti was a rural zone. The District Plan stated: ‘a rural zone was characterised by versatile, productive land where rural production was the primary economic driver’. This was not reflective of Ohauti.
- The approval obtained from Western Bay of Plenty District Council for a subdivision on Mr Thompsons property provided that one of the reasons it had been approved was ‘although Ohauti was a rural zone, it was dominated by lifestyle blocks’.
- The District Plan said ‘lifestyle development should be channelled to land with the following attributes: low versatility for primary production, which was what Ohauti was (steep land, by default being grazed by cattle, not for high economic return but more to control the land).
- The Welcome Bay and Ohauti planning study by Tauranga City Council (TCC) on urban development in its area created a library of supporting documents needed to change a zoning.
- The SmartGrowth ‘Industrial Land Supply’ study done in March this year made recommendations on access and roading. It could be summed up to say that it had already been recommended to SmartGrowth to look at our area.

Mr Bill Wasley (TCC):

- It would be appreciated that advice coming back to the Committee put the Local Government boundary to one side because ‘sub-regional’ advice is sought. The SmartGrowth mantra was based on ignoring Local Government boundaries and what would be the most appropriate pattern for development. There had been some talk this morning about what stopped at the boundary, or either side of the boundary, which was concerning. It was important to note that this advice came back unencumbered by boundaries.

Paula Thompson (BOPRC):

- Could staff please provide advice on the impact of Regional Policy Statement Proposed Change 6 in relation to this matter.

**Submission No.85 – Tauranga Crossing Limited**

Mr Mark Arbuthnot (Director, Bentley & Co. Ltd), Kirsty Dibley (Legal Counsel for Tauranga Crossing Limited (Russell McVeagh) and Greg Akehurst (Director, Market Economics Ltd).

Ms Kirsty Dibley:

- Ms Dibley provided a summary of the legal submission provided on behalf of Tauranga Crossing Limited.

Mr Greg Akehurst:

- By way of background, SmartGrowth's Strategy was looking to accommodate a population of up to 400,00 over the next 50 years, or an additional 20,000 households. By 2048, about 75% of this growth would be 65 plus, which would require some thinking about how housing operated and how the centre network operated.
- The draft strategy recognised a centre hierarchy with only two levels, the Central Business District (CBD), and everything else being considered a town centre. It could be argued that this was not a hierarchy, but the absence of a hierarchy. It failed to describe how the city currently operated, let alone how the city would evolve over the next 10 to 30 years.
- The draft strategy assumed that people would be prepared to take a 30 to 45 minute journey to meet their sub-regional needs which was seen as highly inefficient. In most cities it took no more than 20 minutes, if not significantly less to meet those sub-regional needs.
- Another drawback of this flat strategy/city form was that it led to replication of offer between all the town centres. There would be no ability for some of the larger retailers to meet the wider needs of the sub-region by providing larger outlets in sub-regional or CBD locations. In order to meet the needs of the entire population, they would have to provide smaller stores if possible, within many centres. This was an inefficient way for a city to operate which did not allow for any

significant conglomeration benefit, where other business would choose to co-locate with some of the larger activities that could occur in metropolitan centres.

- Tauranga Crossing, despite its classification, operated as a sub-regional centre. It met wider, sub-regional needs.
- An earlier comment noted that the SmartGrowth Strategy needed to be considered excluding Local Government boundaries. It was noted that 28% of visits to Tauranga Crossing came from outside of Tauranga city. However, TCC's evidence, in terms of how they had classified their centres, was focused on only what happened in Tauranga City.
- The 28% of visitors who came from outside of Tauranga city was twice the rate that Mount Maunganui drew from outside of Tauranga City. It was very much operating as a sub-regional centre, meeting a much wider range of needs than just the immediate and local catchments.
- Currently, Tauranga Crossing was around 13 hectares of land, but this was anticipated to grow quite significantly (also indicated in TCC's own evidence who were looking at Tauranga Crossing be the fastest growing area). While it currently sat below the more established centres in Auckland, by the time the expected growth occurred, it would be well within the land area provided for metropolitan centres. There would therefore be no inefficiency associated with it being potentially constrained by land area.
- It was understood that some of the restraints placed on Tauranga Crossing related to the impact to the CBD. It would require an additional 90 thousand or more square metres of Gross Floor Area (GFA) zoned at Tauranga Crossing before there would be a ten percent impact on the CBD. In Mr Akehurst's opinion, this was not a risk that should result in significant constraints being placed on Tauranga Crossing.
- In summary, Tauranga Crossing was a preeminent centre in the southern part of Tauranga city. It currently met a sub-regional role. This role would only expand in the future. In Mr Akehurst's opinion, it needed to be rezoned to a metropolitan centre in order to maximise the potential efficiencies within the centre network.

Mr Mark Arbuthnot:

- In terms of Tauranga Crossing's role, it was described as a retail centre, however, in doing so, it had bespoke zoning around the Tauriko commercial zone, whose purpose was to provide a sub-regional centre within the city boundaries.
- These provisions, while presently having a retail focus, also included the provisions of the plan to enable for all forms of business activities, such as offices and community facilities as a permitted activity.

- It was important to recognise that, in terms of form and development at Tauranga Crossing, what was currently there was not necessarily what it would be like in the future over the next plan term, and what the opportunities were to support a sub-regional/metropolitan catchment.
- Looking at the history of this property and the intended purpose of the zone itself, which was not proposed to be changed by Plan Change 33, it had always been intended to service a sub-regional catchment.
- Since Plan Change 33, there was now the 'western corridor' which was a key growth area, there was Tauriko West which was a priority development area. There was a significant amount of housing and employment growth forecast within the strategy with this area.
- There was a high degree of synergy in terms of the role of the centre and how this might compliment and deal with the growth in the area.
- The key point was that Tauranga Crossing was relying on plan enabled capacity, rather than the availability of additional commercial land. This was important because at the Plan Change 33 hearing, Council had identified that there was an additional 1.5 hectares of commercial land required to facilitate the growth within the Tauranga Crossing centre. At the moment, that land did not exist, the Centre had blown through its standard and was now beyond the growth area that was otherwise permitted by the plan. Therefore, it now had to grow up rather than out to accommodate that growth.
- In looking at the SmartGrowth Strategy, the concern was that the existing classification of the town centre, in grouping all of these things together, there may be other centres that were more important in terms of accommodating that growth relative to the various growth areas. It was important that this was recognised within this strategy, one of the key reasons being that funding was a significant risk to a lot of the growth that had been forecast. Critical to this funding was having the right centre hierarchy to direct where the funding should be prioritised so that there would be some areas that would be more important in terms of funding and infrastructure. The metropolitan area of the Tauriko commercial zone, recognised as a sub-regional centre, would be very important in terms of directing where all the funding and infrastructure needed to go in and around that area. This needed to be recognised in the strategy.
- Reflecting on what a 'sub-regional' centre would mean, it was felt it should be very consistent with the principles of the Urban form and Transport Initiative (UFTI) in terms of the provision of good access to social and economic opportunities. This would be consistent with principles/objectives of the Specified Development Project for the Western Corridor (SDP), the enabling/aligning of business and residential opportunity that was accessible and/or of high demand.

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- The concern was that without this recognition, there was the potential for constraints in terms of how this centre and the area could grow and meet those demands, and the issue that the growth of a sub-regional centre at the southwestern area of the city would undermine the viability of the city centre itself.

The presenters responded to pātai as follows:

Ms Kirsty Dibley:

- It was felt the draft strategy would have an influence on policy and planning documentation. Given the significant growth which was forecast in the western corridor and the sub-region generally, and Tauranga Crossing needing to be a centre to provide and service that growth, any lesser enabling planning framework could potentially constrain the future development of the Crossing to provide for future anticipated growth.

Mr Mark Arbuthnot:

- It was understood there would be inherent constraints in terms of height and generational traffic matters (amongst other things) that needed to be addressed at the city plan/preparational stage. However, this was more about getting the basic principles correct at the strategy level in terms of giving direction.
- The primary concern with the 'wait and see' approach was that the growth strategy was also the Future Development Strategy (FDS) which, by reference, also incorporated the growth strategy. The FDS was something that councils had to have regard to when preparing planning documents, and the concern was that if the growth strategy was not addressed at this early stage, it would not be providing the right guidance to the territorial/local authorities as to how they should be preparing their respective plan changes as well. The strategy acknowledged there was further work to be done. It was felt the path to do this was through the Implementation Plan rather than through the FDS.

Mr Greg Akehurst:

- Mr Akehurst advised he had been heavily involved in The Base analysis some twenty years ago in Hamilton, giving evidence on behalf of some retailer operators who opposed The Base project. The work undertaken demonstrated that

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The Base would have a significant detrimental impact on the Central Business District which had since proven to the case. At that time, the court did not find in Mr Akehurst's favour. However, it was important to highlight that this was a very different situation to what had occurred in Hamilton, and it was felt that Tauranga did not need to have the same level of concern that Hamilton should have had at the time.

Mr Bill Wasley:

- Mr Wasley advised he would like the panel to discuss this after the hearing to receive staff advice on these complex matters.

The Chairperson thanked the presenter for their supplementary submissions, noting that their request and approach was very clear.

10.32 The hearing adjourned.

10.50 The hearing reconvened.

**Submission No.32 – Des Heke**

- Te Pio Kawe provided a mihi to begin the submission presentation.
- Des Heke introduced himself and Whitiara McLeod and advised that both participated at the Tangata Whenua Forums and the respective Council's as Iwi representatives as partners to SmartGrowth.
- Mr Heke spoke about the Tangata Whenua framework to his submission. There were mutual concerns around risks and some of the solutions around objectives as to whether a sustainable water supply could be met. The main points were:
  - Working together from a Tangata Whenua perspective, based on the values, principles and beliefs, and in particular kōrero pūrākau;
  - Representation and the process of appointing Tangata Whenua was very important. It was noted that Mr Heke was in attendance today with Mr McLeod regarding working together as iwi, highlighting the importance of full iwi representation.

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- Mr Heke recounted the Legend of Mauao, noting that the values and framework captured in the SmartGrowth Strategy were not new to Māori, and that more of this influence should be considered in the long term planning.
- It was felt that this information and knowledge needed to be brought to the forefront and used when thinking about being smart in terms of growth into the next 50 years.
- When looking at Ōtanewainuku, TCC used wainuku (ground water) catchments, successive to previous municipal supply regimes, as the water source.
- Each particular sub-catchment was attached to pepeha – Marae/hapū. Where was their voice on what constrained growth in the catchment? It was very important to have a Tangata Whenua framework around this to ensure equity of contribution around knowledge and information for decision making.
- Growth put pressure on our natural resources, especially water. This was a risk. When looking at the wider catchment, Ōtanewainuku water supply was also going outside to supply alternative catchments.
- Ways of reusing wastewater needed to be investigated, rather than keep drawing on our natural resources of water. The technology was available. Sustainable management of treated municipal supply water needed to be looked at in other ways through building regulation.

#### **Submission No.77 – Social Link**

Liz Stewart and Liz Davies were in attendance to speak to their submission on behalf of Social Link. They highlighted the below points:

- Social Link empowered, connected and supported 'not for profits' in the Bay of Plenty.
- The majority of the submission came from the perspective of a substantial group of people in the Western Bay of Plenty who did not have the wealth to rent or own their own house. In general, they were also unlikely to have the financial means to have a secure and settled future.
- This means that this group of people were dependent on the SmartGrowth Strategy.

Ms Davies continued by providing an overview of the Social Link submission, highlighting key points. There were three areas that were touched on through the submission that were also highlighted in more detail, being social infrastructure, social impact and community engagement. Ms Davies noted the below:

- Social Infrastructure
  - Social Link appreciated the inclusion of social infrastructure considerations in the draft SmartGrowth Strategy, given its importance in contributing to learning, recreation and overall quality of life.
  - Social Link advocated that urban planning should begin with 'people and not pipes'. An example of an outer Melbourne growth area was provided, noting that the urban planning began with the social infrastructure, such as schools, health services, libraries, and parks. The planning for housing, transport and other physical infrastructure would follow.
  - Due to people who lived in lower income areas having less resources to access social infrastructure, it was recommended that an equitable approach was taken to the provision of social infrastructure.
  - Rather than applying the 'same size fits all' approach to levels of service for parks, libraries and community centres, it was important to take into consideration the level of deprivation of communities.
- Social Impact Assessments
  - In 2022, via the Social Sector Forum, it was proposed that there remained a need for a social wellbeing lens on the implementation phase of SmartGrowth, to ensure risk of social wellbeing was mitigated, while enhancing the benefits of projects to impacted communities.
  - Social Impact Assessments were a proven methodology that analysed, monitored and managed the intended and unintended social consequences (both positive and negative) of planned interventions.
  - The proposal (which Social Link supported) recommended Social Impact Assessments be undertaken on projects that were likely to have significant risks and/or opportunities to social wellbeing, as well as monitoring the implementation of the assessments.
- Community Engagement
  - Social Link supported the need for genuine community engagement beyond public consultations on strategies and documents.
  - It was understood that the community engagement teams in respective councils engaged with communities on a project-by-project basis, which was important. However, it was also important to hear the voices of locals, who had

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strong local networks, understood the local whenua and had some knowledge of council process, providing important different perspectives to inform decisions.

- It was noted that decisions improved when there was evident diversity amongst decision makers.

Submitters responded to pātai as follows:

- They were happy to give further thought and suggestions to 'what better looked like' in relation to their submission. It was noted that although the forums gave diversity to some extent, there could be further representation at a senior level in the social and environmental areas, especially when considering the LGA wellbeings. This formed an argument that it would be worthwhile having representatives who carried the lens of Social Impact Assessments and Environmental Impact Assessments.
- It was believed that Social Link and Enviro Hub could be a conduit to the sector and to SmartGrowth outside of the Forums, highlighting the importance for retaining credibility through their representation and support from the sector.
- It was important that the levels of service in areas of deprivation were included as part of the strategy and through the implementation and funding, due to the need for the vision, that was included in strategies and plans, to filter down and inform the implementation and budget.
- The case studies included in the SmartGrowth Strategy gave practical examples of how the high level statements could work.

#### **Submission No.93 – Christine Ralph**

Ms Ralph was in attendance to speak to her submission. She highlighted key concerns from within her submission, regarding the need for greater detail in Part 4 and Part 5 of the SmartGrowth Strategy 2023, and staffing/organisation structure to help monitor the success of the housing provision within the region.

Ms Ralph responded to pātai as follows:

- Since 2008 Ms Ralph had been involved with trying to improve the housing provision. It was acknowledged that the awareness of housing had raised, noting that the SmartGrowth Strategy now included a chapter relating to housing. However, further work could be undertaken in making bolder moves to support the private sector.

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- The SmartGrowth Strategy referenced the Housing Systems Plan, of which Ms Ralph was unable to find. It was important to be able to find any plan referenced through the Strategy. The Panel requested further information to be provided by staff in relation to Ms Ralph's submission, and the Housing Systems Plan.
- If a Housing System Group was established, it should involve Senior Management and dedicated staff, so it was set up in the same way that the existing Transportation Systems Plan Partner Management Group was.
- The SmartGrowth Strategy should include estimates in tranches (immediate, medium and long term) to ensure that, geographically, the sector was able to understand the typology of housing that was expected. It was acknowledged that this information could also be included in the Funding and Implementation Plan, which was reviewed on an annual basis.

**Submission No.03 – Nathan Wansbrough**

Mr Wansbrough was in attendance to speak to his submission, noting that he was a quantity surveyor within a medium sized commercial construction firm in Tauranga. He highlighted the below points additional to his submission:

- It was important that the consultation process was open and accessible to all.
- Acknowledgement and thanks was given to the SmartGrowth Plan itself, including the change of focus to public transport, walking, and cycling.
- The work currently being undertaken on Cameron Road to provide for multimodal means of transport, including the consideration of having bus stops that do not affect the traffic flow.
- As the SmartGrowth Strategy was looking at the next 50 years, Mr Wansbrough felt it was important to consider additional rail, dedicated bus infrastructure (tunnels and bridges).

Mr Wansbrough responded to pātai as follows:

- A submission had been made to the Tauranga City Council LTP.

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- There should be incentives for building higher density housing in the main centres. More residents in the city centre would lead to more people using alternative forms of transport.

**Submission No.70 – Element IMF Limited – Sean Grace**

Mr Grace (supported by Grant Downing and Bryce Donne) was in attendance to speak on behalf of Element IMF Limited who were the main developers of the Tauriko Business Estate. He highlighted the below points additional to his submission:

- The timing for the western corridor transport improvements was set for long-term delivery in 2050, the delivery of this infrastructure should be brought back to medium-term timeframe of 2034.

Mr Grace responded to pātai as follows:

- More certainty on funding mechanisms within the strategy itself would be beneficial for the community and developers.
- Stage 4 of the Tauriko Business Estate was being considered by Tauranga City Council. The area comprised of 92 hectares, of which only 46 hectares were enabled by the first stage of highway works. Once the 46 hectares have been sold the remaining land will be unable to be released for a long period of time as there would be no infrastructure to sustain the development.

**Submission No.57 – National Council of Women – Pauline Bennett**

Carol Gordon was in attendance on behalf of Pauline Bennett to speak to the submission made by National Council of Women.

- The Smartgrowth strategy should focus on creating liveable communities. The National Council of Women was seeking a smart, sustainable and inclusive limit to growth.
- Infrastructure development should address the needs of an aging population. There are two Central Government policies that could help inform the Smartgrowth Strategy; the Better Later Life Strategy and Age Friendly Urban Places Guide (Office for Seniors, Ministry of Social Development).

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Ms Gordon responded to pātai as follows:

- A more tailored approach to public engagement would enable a greater understanding of the community's concerns and aspirations.
- The Strategy references issues like an aging population and inclusion of Tangata Whenua but does not demonstrate how they would be addressed.
- Connected centres do not always result in centres with community amenities unless there was a focus to achieve this goal. Strengthening communities is a significant step in achieving sustainability and wellbeing.

12.15pm      The hearing adjourned.

1.15pm      The hearing reconvened.

**Submission No.90 Bluehaven Group – Nathan York**

Mr York was in attendance to speak to the submission from Bluehaven Group. He highlighted the following points in addition to his submission.

- Bluehaven Group was supportive of the Smartgrowth Strategy in its general terms, however they would like greater alignment with the Urban Form and Transport Initiative and recent planning directions from Central Government.
- Under the recent National Planning Standards, The Sands should be defined as a metropolitan centre.

Mr York responded to pātai as follows:

- The breadth and depth of land use consented in The Sands was greater than the scale that was expected at The Crossing. The mixed land use at The Sands included retail, commercial, medical, leisure, civic and hotels.
- Tauranga City Council would not commit to the Papamoa East Interchange without the development of The Sands and town centre.

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- There were no other town centres contemplated in the Eastern Corridor, whereas The Crossing was proximity to the CBD and Bethlehem.

1.27pm      The hearing adjourned.

1.45pm      The hearing reconvened.

The hearing closed at 1.45pm.

SmartGrowth Submissions Hearings – 5 December 2023

Questions / Matters for Staff to Report back on	Status
<b>1. Industrial Land (Bell Rd Partnership Ltd) - Aurecon Report vs Further Investigation Report</b>	
- Question whether the Industrial Land Study Supplementary Report said that the areas should go through the submissions process.	See FDS Industrial IOP
- East v west corridor approach, east feel that somewhere in all of this process that the west has taken priority.	
- Bring study to the SLG on 18 <sup>th</sup> December to close out the process. Needs to be clear that it is information only and will be provided to the hearings panel for deliberation. The panel will make a recommendation back to SLG.	
<b>2. Why the top scoring scenario from UFTI wasn't the preferred option</b>	See Urban Form and Centres IOP
- Review decision making through UFTI through the preferred option for connected centers.	
<b>3. Request that the boundaries be put to one side. This is a sub-regional Strategy. (Follow up on Ohauti submissions)</b>	See FDS IOP, Site visit planned.
- Need some advice on Ohauti (both submissions, Landplay and Landsdale)	
- Need to take a sub-regional review rather than a 'partner' view.	
- What follow up we need on the Ohauti submission, to discuss further.	
- Clarity also required around a sub-regional approach (examples with māori land blocks that straddle Western Bay and TCC and catchments e.g Waitaha, barrier in progressing developments).	An Implementation and Funding Plan Issue
- Implications of PC 6.	
<b>4. Impact of Proposed Plan Changes</b>	See Deliberations Report.
- Wider issue after plan changes 6, 33 and 92	
- What are the recommendations coming out of those plan changes?	
- Get dates for the plan change decisions and what are the implications?	
- What are the implications both ways?	
<b>5. Government policy shifts to be incorporated/considered.</b>	See Deliberations Report.
- More information to come from central government that needs to be incorporated into the strategy.	



Questions / Matters for Staff to Report back on	Status
<b>6. Advice on the approach to centres - work being done by WBOPDC/TCC for pending plan changes (from Tauranga Crossing Ltd submission)</b>	See Urban Form and Centres IOP
- Wanting to understand where TCC is at with commercial centers review.	
- WBOPDC looking at spatial planning for key areas.	
- Commentary on significance of having a subregional policy approach.	
<b>7. Information on the Housing System Plan</b>	See Housing IOP
- Why it's waiting for the SG process rather than being an input.	
- Need an update on where it is at generally and confidence that it is the vehicle to pick up the issues that were raised and that it can do so. E.g demographic change (ethnicity) and aging population (recent Paul Spoonly presentation is helpful).	
<b>8. Te Tumu</b>	See FDS IOP
- – what is proposed by TCC on Plan Change?	
- Update from TCC on facts on where the plan change is. A briefing is required as soon as possible, most likely early 2024.	
- Clarity for timeframes should be by the end of 2023.	
- Next year deliberations process, after decision made the submitters will be communicated with.	
- Decoupling the plan change from the infrastructure investment and what this looks like.	
- Can a plan change proceed without the guarantee of access? Consenting the additional access, one of the issues TCC is dealing with at the moment (community safety and natural hazards).	
- Conscious of the SG process vs the TCC process.	
<b>9. Process for developing better delivery of community engagement</b>	See General IOP - Implementation Plan issue
- Theme through the submitters that losing the community forums is a point of frustration.	

Questions / Matters for Staff to Report back on	Status
- Are we losing something by not having community engagement but balancing that with effectiveness of the forums.	
- Two parts to it, stakeholder groups that the forums use to provide and wider community engagement.	
- Acknowledge the community engagement requests that have come through this process.	
- Combined Tangata Whenua forum is not an effective form of engagement from some hapu.	
<b>10. FDS Long term Growth Areas (Te Puna, Kairua)</b>	See FDS IOP
- Te Puna discussion from Beth Bowden and Pirirakau.	
- Request for a specific working group with Pirirakau.	
- Emily provided update on spatial planning approach for WBODPC.	
<b>11. TCC - Commissioners saying 21, 000 in the Western Corridor (50% of growth)/ At variance with SG which has 10% in the Western Corridor (Glen Crowther)</b>	See FDS IOP
- SLG resolved some matters in relation to growth, numbers and SDP, get an understanding of if there is a discrepancy in the numbers and in particular the short, medium and long term and what this looks like.	
- LTP need to inform our funding and financing plan/implementation funding plan.	
- LTP's are working to different timelines between the three councils. In addition City and Regional deals and the information that is coming out of there needs be taken into account. As well as regional land transport plans.	
- Communications with the councils as we progress through the LTP process and finalisation of the strategy.	
<b>12. Site visits</b>	Arranged for 20 February
- Yes, times and dates to be confirmed.	
- Build site visits into the process to understand the areas we are making decisions about and collect our thoughts on where we want to go.	

Questions / Matters for Staff to Report back on	Status
- Suggestion for Bell Road, Te Tumu, Tauriko West (SDP area) and Ohauiti.	
<b>13. Transport</b>	See transport IOP
- Acknowledgment of passenger rail submissions and Kaimai tunnel.	
- Is the existing rail corridor fit for purpose?	
- Socialise Kiwirail discussions with the whole panel.	
<b>14. SG Vision</b>	See General IOP
- Suggested to modernise the vision.	
- Suggestion to provide for place and people here now as well as who is to come.	
- Discussion to be had and advice to come back.	
<b>15. Emissions reduction targets</b>	See Climate IOP
- How well have we integrated this into the strategy?	
- TSP VKT this isn't the only solution.	
- Looking at what other Tiers One and SG partners are doing in this space.	
- Need to integrate new policy direction changes.	
<b>16. Water supply</b>	See Infrastructure IOP
- Freshwater data availability has that been made available to SG?	
- WBOPDC water supply	
- Des and Whitiara's submission points.	
<b>17. Connection with the Waikato</b>	See General IOP
- Hamilton to Tauranga investment program and potentially finding a home for that somewhere in the strategy.	
- Ensuring that we are connected with what is happening with future proof.	
<b>18. Maps</b>	See various IOPs
- Digital version/mapping tool is required.	

Questions / Matters for Staff to Report back on	Status
<b>19. Communications</b>	Completed
- Next year deliberations process, after decision made the submitters will be communicated with.	
- Luke to prepare general communications for an interim update, 'thank you for submitting'.	
- Response to submitters will be done by way of a decision document outlining all of the key issues	

**SMARTGROWTH STRATEGY WORKSHOP – DAY ONE**

- DATE:** Day One – Wednesday, 7 February 2024 at 10.23am.
- HELD:** Western Bay of Plenty District Council Chambers, Barks Corner.
- TOPICS:**
1. Areas to be Protected and Developed Carefully – Barbara Ann-Overwater;
  2. Tangata Whenua – Elva Conroy;
  3. Climate Resilience – Manini Abernethy;
  4. Te Taiao – Our Environment – Barbara Ann-Overwater;
  5. Urban Form and Centres – Carl Lucca;
  6. Rural – Tracey Miller;
  7. Housing – Simone Cuers and Jodie Rickard;
  8. Transport – Sarah Dove, Peter Siemens and Craig Richards;
  9. Three Waters and Other Infrastructure – Steve Hurley
  10. Economic Wellbeing – Greg Simmonds
- PANEL MEMBERS PRESENT:** Chairperson Andrew Turner (Independent Chair – SmartGrowth)  
Cr Paula Thompson (Bay of Plenty Regional Council)  
Cr John Scrimgeour (Western Bay of Plenty District Council)  
Matire Duncan (Tangata Whenua Representative)  
Bill Wasley (Tauranga City Council)  
John McDonald (Central Government Representative – Ministry of Housing and Urban Development)

SmartGrowth Strategy Workshop – Day One – 7 February 2024

**STAFF IN ATTENDANCE:**

Craig Batchelar (SmartGrowth Advisor), Elva Conroy (SmartGrowth Tu Pakari Advisor), Te Pio Kawe (Smartgrowth Tu Pakari Advisor) Nichola Lennard (SmartGrowth Advisor)

For Western Bay of Plenty District Council: E Watton (Strategic Policy and Planning Programme Director), T Miller (Strategic Advisor Resource Management), H Wi Repa (Governance Technical Advisor), J Rickard (Community and Strategic Relationships Manager), and J Osborne (Governance Advisor).

**VIA ZOOM:**

Steve Hurley (Tauranga City Council), Anthony Pearse (Tauranga City Council), Sarah Dove (Tauranga City Council), Nathan Te Pairi (Bay of Plenty Regional Council), Craig Richards (BECA), Christine Jones (Tauranga City Council), Greg Simmonds (Priority One)

**KARAKIA**

Te Pio Kawe opened the hui with a karakia.

**INTRODUCTION:**

The Chairperson opened the workshop and welcomed everyone in attendance. Craig Batchelar spoke to the workshop cover report, highlighting the key areas and providing the committee with an overview. It was noted that the purpose of the workshop is to ensure that the Panel is satisfied with the options presented for each issue and can signal any further information that is required, to enable the Panel to make decisions at its deliberations meeting on 29 February/1 March 2024.

**1. Areas to be Protected and Developed Carefully – Barbara-Ann Overwater**

Barbara-AnnOverwater spoke to her draft Issues and Options paper and responded to questions related to the below areas/topics. The Panel's discussion on each issue is outlined below.

Issue 1: Limiting Growth and Providing Green Corridors, Sustainability, and Resilience

SmartGrowth Strategy Workshop – Day One – 7 February 2024

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- Additional case study and work involved;
  - Favoured option – 1B; and
  - Compliance of the strategy with National Planning Standards.

**Panel direction:** Option 1B be recommended as the preferred option.

Issue 2: Constraining Development in Areas with Natural Hazard Risk

- Consideration of the five principles of green growth – being Wellbeing, Justice, Planetary Boundaries, Efficiency and Sufficiency, and Good Governance;
- Draft Strategy and relation to level of detail/explanation for users; and
- Clarity within the strategy relating to National Planning Standards.

**Panel direction:** Option 2B be recommended as the preferred option, and insert wording based on the advantages paragraph in Issue 3A consideration.

Other Direction for staff:

- Investigate compliance of the strategy with National Planning Standards.

## **2. Tangata Whenua – Elva Conroy**

Elva Conroy spoke to her draft Issues and Options paper and responded to questions related to the below areas/topics. The Panel's discussion on each issue is outlined below.

Issue 1: Partnership and Participation

- Timing, sequencing, and resourcing for implementation; and
- Tangata Whenua Spatial Planning completion plan.

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**Panel direction:** Option 1A be recommended as the preferred option.

Issue 2: Enabling the Marae as Centres Programme

- Draft Funding and Implementation Plan complexity and demands;
- Funding and resourcing;
- Timeframes;
- Use of existing partner Council arrangements and strategic ways of working;
- Collaboration and communication between partners; and
- Transformation approach – “top down or bottom up?”.

**Panel direction:** Option 2A be recommended as the preferred option.

### **3. Climate Resilience – Manini Abernethy**

Manini Abernethy spoke to her draft Issues and Options paper and responded to questions related to the below areas/topics. The Panel’s discussion on each issue is outlined below.

Issue 1: Managed Retreat

- Reasoning for recommended option (1B);
- Public inquiry into community-led retreat and adaption planning/funding;
- Involvement of communities; and
- Ensuring that conversations are happening with the Marae community.

**Panel direction:** Recommended Option 1B as the preferred option or an option that includes the point being made in 1B, with acknowledgement to future opportunities consultation with affected communities.

Issue 2: Emissions Reductions Target

SmartGrowth Strategy Workshop – Day One – 7 February 2024



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- Alteration/addition of wording (see recommendation below).

**Panel direction:** Recommended Option 2B as the preferred option, with the following changes:

- Alteration of *'low emissions outcomes'* to *'reduced emissions outcomes'*.
- Include reference to councils existing climate action plans and that the statement aligns with those.
- Addition of *'Park and Ride'* to the list, alongside carpooling.
- Include, prior to the list, the following wording: *"Including"* to show that the list is not extensive.
- Amend *'frequent public services'* to *'frequent, reliable, and innovative public transport'*.

#### Issue 3: Climate Resilient Development

- Relative definition of elderly;
- Alteration to wording (see recommendation below);
- Inclusion of case study; and
- Resourcing and timing required in a case study, in order to consider adopting Option 3C.

**Panel direction:**

- Option 3B be recommended as the preferred option, with the removal of *'elderly'* at the beginning and end of the Option paragraph, as well as the addition of further consideration around the resourcing required and timing of adopting the Option.
- In addition, recommend Option 3D as the preferred option, but alter wording to read *"encourage and enable emissions reductions..."*.

#### Issue 4: Climate Change Action

- Risk of duplication with sub-regional climate action plans.

**Panel direction:** Option 4B be recommended as the preferred option and include acknowledgment that SmartGrowth partners have climate actions plans and give reference to/incorporate them into the Strategy. This mitigates the need for the Implementation and Funding plan.

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Other Direction for staff:

- Provide further understanding on the public enquiry into community-led retreat and adaption planning/funding, and the technical report generated from this.
- The Panel requested that some work be undertaken around Option 3C, to determine what local studies were already available, and the resourcing/timing required in the Option.

12.07pm The workshop adjourned.

12.28pm The workshop reconvened.

#### **4. Te Taiao – Our Environment – Barbara-Ann Overwater**

Barbara-Ann Overwater spoke to her draft Issues and Options paper and responded to questions related to the below areas/topics. The Panel's discussion on each issue is outlined below.:

##### Issue 1: Poor Air Quality

- Highlighting this as part of a longer-term journey; and
- Responsibility of other authorities/entities.

**Panel direction:** Recommend Option 1B as the preferred option, with an amendment to Figure 2 to add the environmental management programmes and further text around specific impacts of air quality.

##### Issue 2: Impact of Growth on the Environment

**Panel direction:** Recommended Option 2A. as the preferred option

##### Issue 3: Manage and Protect Freshwater Resources

- Clarity on the strategy and responsibilities of councils, versus what can be actioned in the strategy;

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- Revisiting the area once Central Government's policy position is clearer;
- Future changes to Te Mana o te Wai; and
- Change to Government policy and analysing the risks/need for prioritisation.

**Panel direction:** Recommended Option 3A as the preferred option, acknowledging that the role of Te Mana o te Wai may change. In addition, consider the potential for Option 3B to be revisited once Central Government's policy position is clearer.

## 5. Urban Form and Centres – Carl Lucca

Carl Lucca spoke to his draft Issues and Options paper and responded to questions related to the below areas/topics. The Panel's discussion on each issue is outlined below.

### Issue 1: Support for the Proposed Urban Form and Centres Approach

**Panel direction:** Option 1A be recommended as the preferred option.

### Issue 2: Open Space Provision

- Botanic gardens versus open space as a more general approach.

**Panel direction:** Do not adopt directive around botanic gardens or Te Tumu Regional Park, but to look at whether there was a need to strengthen existing wording in strategy to highlight the need for open space.

### Issue 3: Opposition to the Urban Form and Centres Approach

- Work involved in Option 3B;
- Opportunities for further public consultation;
- Historical context of the Option;
- Urban sprawl, associated costs, and appropriate planning;
- Confidence in numbers and 'one source of the truth'; and

- 
- Urban Form and Transport Initiative (UFTI) and sustainable urban form.

**Panel direction:**

- Do not accept Option 3B, with further information to be added in terms of historical context/background, urban sprawl, associated costs, and appropriate planning, in order to support this position.
- Option 3C be recommended as the preferred option, with additional information to provide confidence in the numbers and consistency across the strategy.

Issue 4: Commercial Centres

- Future growth areas/town centres and planning; and
- Centres hierarchy.

**Panel direction:** Option 4B be recommended as the preferred option.

**6. Rural – Tracey Miller**

Tracey Miller spoke to her issues and options paper and responded to questions related to the below areas/topics. The Panel's discussion on each issue is outlined below.

Issue 1: Enabling Additional, Secondary and Minor Dwellings on Properties in the Rural Zone

- Clarification on recommended Option;
- Opportunities for additional minor dwellings in rural zone; and
- Tauranga City versus Western Bay provisions.

**Panel direction:**

- Complete a review of the provisions of the plan, bearing in mind services (such as water) do not have to be provided to rural properties and can be independent (bores etc), with no identified predetermined outcomes from this review. Additionally, note that other infrastructure could be better utilised by having a greater rural population (such as roading).

- 
- Neighbouring Council (Whakatāne) are undergoing a similar process – investigate opportunity for collaboration.
  - Option 1B to be subsumed into Option 1A, to then be decided upon at the deliberations stage.

## 7. Housing – Simone Cuers and Jodie Rickard

Jodie Rickard and Simone Cuers spoke to their draft Issues and Options paper and responded to questions related to the below areas/topics. The Panel's discussion on each issue is outlined below.

### Issue 1: Incorporate Sustainability and Accessibility Standards in New Homes

- Changing regulations and incorporating this into the wording.

**Panel direction:** Option 1B be recommended as the preferred option.

### Issue 2: Use Inclusionary Zoning to Achieve Housing Outcomes

**Panel direction:** Option 2A be recommended as the preferred option, with addition of information relating to the Queenstown Lakes example.

### Issue 3: Intensification in Existing Urban Areas

**Panel direction:** Option 3A be recommended as the preferred option.

### Issue 4: Role of Local Government

- Acknowledging that SmartGrowth has a role to play;
- Delivery of housing systems and what that involves; and
- Accountability of implementation/outcomes.

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**Panel direction:**

- Recommend Option 4A as the preferred option, with acknowledgment that SmartGrowth has a role to play in bringing partners together for these conversations to take place.
- Integrate wording from Option 4A into Strategy.
- Provide further information on the Housing Action Working Group, what its role is, and the outcomes it is working towards – to be discussed at the deliberations meeting.

**Issue 5: Māori Housing**

- Is the issue development contributions or funding?; and
- Housing and funding being a significant impediment.

**Panel direction:** Option 5A be recommended as the preferred option.

Commentary around housing and funding being a significant impediment be included.

**Issue 6: Social/Community Housing**

- Does the current strategy give a clear growth directive?;
- Transparency around the housing situation; and
- Clarity around roles in the housing space (e.g. Council versus Local Government), and what can be influenced/actioned.

**Panel direction:** Option 6A be recommended as the preferred option.

**Issue 7: Strengthen the Focus on Housing Outcomes in the Strategy**

- Other communities need to be considered alongside ethnic diversity;
- Where does the Bay of Plenty Community Trust Initiative sit?;
- Other initiatives that are underway;
- KPI's against housing outcomes;
- Housing Action Group responsibility; and

- 
- Measuring against the directives.

**Panel direction:** Option 7A be recommended as the preferred option.

Issue 8: Develop Monitoring and Reporting Framework for SmartGrowth Sub-Regional Housing Systems Plan

**Panel direction:** Option 8A be recommended as the preferred option but ensure a more focussed approach – all partners buying into the Housing Action Group and be involved in the intentions of the Group. There needs to be a consolidated approach of all partners using the same data and sharing the same priorities.

**8. Transport – Sarah Dove and Peter Siemens (Tauranga City Council), and Craig Richards (BECA)**

Sarah Dove and Peter Siemens, supported by Craig Richards, spoke to their draft Issues and Options paper and responded to questions related to the below areas/topics. The Panel's discussion on each issue is outlined below.

Issue 1: Passenger Rail

- Opportunities to partner;
- Wording of option 1A versus 1B; and
- Historic Rail Strategy prepared by BOPRC, in response to a SmartGrowth Strategy at the time.

**Panel direction:**

- Report back on historic Rail Strategy created by BOPRC.
- Provide commentary around the Ministry of Transport's work around passenger rail.
- Option 1A be recommended as the preferred option.

Issue 2: Improved Public Transport

**Panel direction:** Option 2A be recommended as the preferred option.

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Issue 3: Investment in Transport Infrastructure

- SmartGrowth partnership in supporting/advocacy role.

**Panel direction:** Option 3A be recommended as the preferred option but amend wording so that it is not limited by Government policy. Involve the SmartGrowth partnership in the advocacy aspect of the recommendation.

Issue 4: Transport for Ageing Population and Planning for all Abilities

**Panel direction:** Option 4B be recommended as the preferred option.

Issue 5: Infrastructure for Walking and Cycling

- Environment we are working in – e.g. potential change in Government policies on transport;
- Funding able to be secured;
- Integrated planning across 'sister councils';
- Where does TSP fit in this space?;
- How do proposed new governance structures sit within TSP?;
- Is TSP the accountable body for the delivery and implementation of the SmartGrowth strategy?;
- What does the strategy say that determines what the implementation/funding looks like and the relationships needed for this?; and
- Funding and encouraging projects.

**Panel direction:** Option 5A be recommended as the preferred option, with referral to a separate TSP mechanism strategy topic, which includes the mechanism as referred to below in *Other Discussion/Direction*, the role of TSP, and the funding that comes through LTP's.

*Other direction:*

- Appropriate mechanisms put in place to ensure that integration monitoring and alignment occurs – potential wording: *A need for partners, as appropriate, to put in place relevant structures that will ensure alignment delivery.*



- 
- Have we got the right mechanisms and structures in place to ensure a level of collaboration for what is needed?
  - Report separately on high level things that are not driven by submissions, such as Government policy changes and Local Government changes.

#### Issue 6: Car Parking

**Panel direction:** Option 6A be recommended as the preferred option, with a need for an integrated approach across the sub-region (and connecting beyond the sub-region) with public transport/walking/cycling, and acknowledging that SmartGrowth has a role in this alignment, when considering the implementation plan.

#### Issue 7: Managed Lanes

**Panel direction:** Option 7A be recommended as the preferred option, with Option 7B being a possibility if a funding opportunity were to present itself.

#### Issue 8: Resilience

**Panel direction:** Option 8A be recommended as the preferred option, with wording amended to say: "Ensure the SmartGrowth Strategy's implementation Plan notes to progress existing partners projects." – Rest of bullet point removed.

#### Issue 9: Ferries

**Panel direction:** Option 10A be recommended as the preferred option, with further investigation into what the prior study on ferries to provide more information, and to ensure there are no inconsistencies.

#### Issue 10: Park and Ride Facilities

**Panel direction:** Option 10A be recommended as the preferred option.

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Issue 11: Emissions and Air Pollution

**Panel direction:** Option 11A be recommended as the preferred option.

Issue 12: Miscellaneous

- Lack of engagement and community engagement; and
- Changes to target to ensure it is a strategy for the future.

**Panel direction:**

- Lack of engagement/community engagement to be discussed during Day Two of the workshop (8 February).
- Day two of workshop: A conversation to be had at a wider level about whether to amend the strategy to respond to changes in government or Local Council policy and/or funding or ensuring that the strategy is set at a high enough level to encompass these changes as they come.

3.42pm Member Cr Thompson left the workshop.

3.42pm The workshop adjourned.

3.56pm The workshop reconvened.

### 9. Three Waters and Other Infrastructure – Steve Hurley

Steve Hurley spoke to his draft Issues and Options paper and responded to questions related to the below areas/topics. The Panel's discussion on each issue is outlined below.

Issue 1: Three Waters Reform

**Panel direction:** Option 1B be recommended as the preferred option.

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Issue 2: Water Supply Analysis and Availability

- Funding for infrastructure and development opportunities/constraints; and
- Volume of water versus the infrastructure needed to reticulate it.

**Panel direction:** Option 2A be recommended as the preferred option.

Issue 3: Electricity Generation and Supply

**Panel direction:** Option 3B be accepted.

**10. Economic Wellbeing – Greg Simmonds**

Greg Simmonds (via Zoom) spoke to his draft Issues and Options paper and responded to questions related to the below areas/topics. The Panel's discussion on each issue is outlined below.

Issue 1: Oppose the Strategy

**Panel direction:** Option 1A be recommended as the preferred option.

Issue 2: Changes to Strategy to Incorporate Great Emphasis on Environmental Sustainability

**Panel direction:** Option 2A be recommended as the preferred option.

Issue 3: Add a New Economic Objective that Recognises and Supports Existing Industrial Activities Contributing to the Regional and National Economy

**Panel direction:** Option 3A be recommended as the preferred option.

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Issue 4: Changes to Strategy to Strengthen the Importance of the Role of the Sub-Region in the Upper North Island Economy

**Panel direction:** Option 4B be recommended as the preferred option.

Issue 5: Add a Source for the Employment Data in the Chart on Page 136

**Panel direction:** Option 5B be accepted.

The workshop adjourned at 4.16pm, to be reconvened at 9.30am on 8 February 2024.

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**SMARTGROWTH STRATEGY WORKSHOP – DAY TWO**

- DATE:** Day Two – Thursday, 8 February 2024 at 9.33am
- HELD:** Western Bay of Plenty District Council Chambers, Barkes Corner.
- TOPICS:**
1. Social Infrastructure and Wellbeing – Sonya McCall and Rebecca Gallagher;
  2. Future Development Strategy – Craig Batchelar and Nichola Lennard;
  3. Industrial Land – David Phizacklea;
  4. Parts 1 & 2 General – Craig Batchelar;
  5. Policy Environment – Craig Batchelar; and
  6. Next Steps – Chairperson Andrew Turner.
- PANEL MEMBERS PRESENT:** Chairperson Andrew Turner (Independent Chair – SmartGrowth)  
Cr Paula Thompson (Bay of Plenty Regional Council)  
Deputy Mayor John Scrimgeour (Western Bay of Plenty District Council)  
Bill Wasley (Tauranga City Council)  
John McDonald (Central Government Representative – Ministry of Housing and Urban Development)
- APOLOGIES:** Matire Duncan (Tangata Whenua Representative)
- STAFF IN ATTENDANCE:** Craig Batchelar (SmartGrowth Advisor), Elva Conroy (SmartGrowth Tu Pakari Advisor), Te Pio Kawe (SmartGrowth Te Pakari Advisor) and Nichola Lennard (SmartGrowth Advisor)

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For Western Bay of Plenty District Council: E Watton (Strategic Policy and Planning Programme Director), T Miller (Strategic Advisor Resource Management), J Rickard (Community and Strategic Relationships Manager), and H Wi Repa (Governance Technical Advisor)

#### OTHERS

Submitters as listed in the notes.

#### VIA ZOOM:

Steve Hurley (Tauranga City Council), Anthony Pearse (Tauranga City Council), Sarah Dove (Tauranga City Council), Nathan Te Pairi (Bay of Plenty Regional Council), Craig Richards (BECA), Christine Jones (Tauranga City Council), Greg Simmonds (Priority One)

#### KARAKIA

Te Pio Kawe opened the hui with a karakia.

#### INTRODUCTION:

The Chairperson opened the workshop and welcomed everyone in attendance. Craig Batchelar spoke to the workshop cover report, highlighting the key areas and providing the committee with an overview.

### **1. Social Infrastructure and Wellbeing – Sonya McCall and Rebecca Gallagher**

Sonya McCall and Rebecca Gallagher spoke to their draft Issues and Options paper and responded to questions related to the below areas/topics. The Panel's discussion on each issue is outlined below.

#### Issue 1: Consistency and Clarity on Definition of Terms used when talking about Social Infrastructure

- What is meant by 'Equity of Provision';
- Social infrastructure at community level versus direction at a higher level;
- Definition of social infrastructure; and

- 
- Increments for demographic ages, in terms of differing needs.

**Panel direction:** Option 1 be recommended as the preferred option, with a description about what 'equity of provision' is.

- Adequate focus in terms of social infrastructure and community amenities.
- Ensuring demographic age cohorts are divided up (e.g. 65-70, 70-75).

Issue 2: Ensuring Integration of Social Infrastructure with the Strategy Objectives and Alignment between Chapter 10 and other Chapters of the SmartGrowth Strategy

**Panel direction:** Option 2 be recommended as the preferred option, in addition:

- Refer to green space more generally and add the words 'public open space' in Issue 2.
- Ensuring that community facilities are resilient to an increase in natural hazards, and what the facilities are able to add to, in terms of broader community resilience.

## **2. Future Development Strategy – Craig Batchelar and Nichola Lennard**

Craig Batchelar and Nichola Lennard spoke to their draft Issues and Options paper and responded to questions related to the below areas/topics. The Panel's discussion on each issue is outlined below:

Issue 1: Oppose the Strategy

Options were not provided for this issue.

Issue 2: Infrastructure Readiness

- Whether SmartGrowth should show more leadership in this space;
  - Intentions of the strategy versus implementation plan;
-

- 
- Need for certainty around the review process;
  - The review period;
  - Appropriate level of discussion and direction in strategy to allow partners to undertake required advocacy for infrastructure;
  - Authority of SmartGrowth; and
  - Legislative uncertainty and the interim.

**Panel direction:**

- Option 2B be recommended as the preferred option, with acknowledgment that the certainty that submissions are seeking will come from the Implementation and Funding Plan, rather than from the strategy. Also include acknowledgment within the strategy around the infrastructure that is needed to delivery the strategic outcomes, and comments around timing.
- Report back on the role of electricity regulator entity.
- Provide further information on where Central Government is at on the Infrastructure Priorities.
- Provides pros and cons (options) of waiting versus carrying on, on the basis that common sense will prevail.
- Work could be done in terms of approach for the strategy review, given the uncertainty and political direction.
- Clarify role/purpose of strategy, and the role/purpose of the Implementation and Funding Plan.

Issue 3: Maps

Options were not provided for this issue.

Issue 4: Support for the FDS

Options were not provided for this issue.

Issue 5: Population Assumptions

- This topic being part of the regular review;

**Panel direction:**

- Disaggregate the groups (e.g. ages – 65+ etc).
-



- 
- Keep a watching brief and have regular reviews/monitoring.
  - The importance of having consistent population figures was noted by the Panel.
  - Recognising the importance of finer grained planning data/information at the next level of implementation.

Issue 6: Settlement Pattern – Timing: Te Tumu, Keegan Road, Tauriko West

- Who's driving what?;
- Keenan Road Issue, distinguished from Te Tumu and Tauriko West;
- Authority of SmartGrowth versus a separate Government run processes; and
- Involvement in SDP.

**Panel direction:**

- Identify both areas as priority areas, but acknowledged that zoning changes and infrastructure funding would be required.
- Disaggregate Te Tumu from Tauriko West and Keenan Road, due to specific matters being progress within Te Tumu (split into three different issues).
- Ensure a timeframe for the SDP that fits in with the adoption of the strategy.
- Staff to report back on:
  - Te Tumu – identify effect of the option, e.g. promoting rezoning earlier than previously understood, and indicating potential altered timing subject to funding solution being available.
  - Tauriko West – this project is on track.
  - Keenan Road – follow up on where this is at.

11.08am The workshop adjourned.

11.18am The workshop reconvened.

Issue 7(1): Settlement Pattern – Additional Areas: Wairākei South and Tara Road

Craig Batchelar declared a conflict of interest in the item and left the meeting.

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- 
- Flooding and stormwater issue; and
  - Ground conditions.

**Panel direction:** That Wairākei South and Tara Road be separated, with an explanation around both sitting in the same catchment and potential catchment issues.

Issue 7(2): Settlement Pattern – Additional Areas: Residential Growth in the East

- Why not Option 7(2)C?.

**Panel direction:** Option 7(2)C (or new option) recommended as the preferred option, with modification to acknowledge that further work is being undertaken in Te Puke, through the Te Puke Spatial Plan. However, this Spatial Plan will not have impact on the Eastern villages, as they are outside of the scope.

Issue 7(3): Settlement Pattern – Additional Areas: Residential Growth for Welcome Bay and Upper Ohauiti

- Clarification on private plan change request versus Issue 7(3);
- Emphasise rural residential matter, and ensure rationale is agreed with; and
- Site visit to Ohauiti;

**Panel direction:** Option 7(3)B be recommended as the preferred option.

Issue 7(4): Settlement Pattern – Additional Areas: Intensification

**Panel direction:** Option 7(4)A be recommended as the preferred option

Issue 7(5): Settlement Pattern – Eastern Corridor versus Western Corridor

- Certainty around next steps and clarity;
  - What's included in the SDP area; and
  - Addressing the housing shortfall and identifying it on the map.
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**Panel direction:** Option 7(5)B be recommended as the preferred option, with acknowledgment that certain circumstances may allow for development prior to 30 years.

Issue 8: Te Puna and Surrounds

- Will WBOPDC's Spatial Planning work provide enough evidence?; and
- Definition of a potential long-term growth area versus imminent work on a spatial plan.

**Panel Direction:** Option 8A be recommended as the preferred option, with clearer wording around 'potential' long-term growth area.

Issue 9: FDS Implementation

- Clarity of RPS.

**Panel direction:** Option 9A be recommended as the preferred option, acknowledgement that the FDS covers urban areas and does not apply to rural areas.

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### 3. Industrial Land – David Phizacklea

David Phizacklea spoke to his draft Issues and Options paper and responded to questions related to the below areas/topics. The Panel's recommendations for each Issue are also outlined below.

Issue 1: General – Potential Future Industrial Land Areas

- Difference between 1B, 1C, and 1D;
- Potential for further work on long-term sites;
- Definition of potential long-term growth; and
- Concerns with the Mount Industrial areas through the Mount Industrial Study (see Issue 2).

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**Panel direction:** Option 1B be recommended as the preferred option, and ensure consistency across the strategy with the terminology “potential long term growth”, and whether that is 10-30 years or 30+ years.

Issue 2: Providing for Existing Industrial Activities

**Panel direction:** Potential for Option 1A and 1B to be combined into another option, or to reword option to highlight both the benefits and disbenefits of existing industrial activities.

Issue 3: New Potential Growth Areas – Bell Road/Wairākei South

Craig Batchelar declared an interest in the item and left the meeting.

**Panel direction:** Option 3A be recommended as the preferred option, and ensure wording is consistent.

Issue 4: New Potential Future Business Area – Ōmokoroa/Apata

**Panel direction:** Option 4A be recommended as the preferred option.

Issue 5: New Potential Future Business Area – Te Puna

**Panel direction:** Option 5A be recommended as the preferred option

Issue 6: New Potential Future Business Area – Te Puke

- Submission from Te Puke Economic Development Group (EDG) and what is being done about concerns;
- Is this the process for addressing these concerns?;
- Stormwater management in the area and appropriate zoning;
- Wider land use and needs for Te Puke, and the Te Puke Spatial Plan; and
- Have constraints in development been addressed in the Housing and Business Capacity Assessment (HBA)?.

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**Panel Direction:** Option 6A be recommended as the preferred option, but realising that status quo hasn't delivered intended outcomes to date, and the Te Puke Spatial Plan is the vehicle to investigate and further consider this as needed.

12.41pm The workshop adjourned.  
1.12pm The workshop reconvened.

#### 4. Parts 1 & 2 General – Craig Batchelar

Craig Batchelar spoke to his draft Issues and Options paper and responded to questions related to the below areas/topics. The Panel's discussion on each issue is outlined below.:

##### Issue 1: Oppose

- Concerns with disjoint between SmartGrowth, TSP, UFTI, and other documents;
- Relationship between core group, TSP, and the Housing Systems Plan, and visibility around these; and
- Where in the strategy is the significant weighting or consideration on the overall strategy, and other documents?.

##### **Panel direction:**

- Option 1A be recommended as the preferred option, with addition that the sentiment of the submissions can be picked up in the Implementation and Funding Plan, and any structural changes that could be considered after the adoption of the Strategy, are considered. Cross referencing to other issues and options papers that addresses the growth scenario and population.
- Look into how the Housing Systems Plan and TSP fit in delivery, and how they fit into the structure.
- Include wording on the weighting on the strategy with other documents, and the intention of the strategy with other documents.

##### Issue 2: Changes to Vision – other UGPs

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**Panel direction:** Option 2B be recommended as the preferred option, but flag at the next review of the strategy whether it is time to refresh the vision.

Issue 3: Changes to Vision – Tangata Whenua Values

**Panel direction:** Option 3B be recommended as the preferred option, but at the next review of the strategy, provide opportunities to review concerns raised.

Issue 4: Objectives, Challenges, Opportunities

**Panel direction:** Option 4A be recommended as the preferred option, while ensuring clarity on 'equitable outcomes'.

Issue 5: Transformational Shifts

**Panel direction:** Option 5B be recommended as the preferred option, and include reasoning for not including any more transformational shifts.

Issue 6: Implementation Plan – Specific Actions to be Included

**Panel direction:** Option 6A be recommended as the preferred option, and reframe the way it refers to partnership/implementation, and come back to deliberations with a different approach.

Issue 7: Consultation & Engagement

- Understanding what the issue is, rather than jumping to an outcome;
- Self determination and localism – how can this be better enabled?;
- Does everyone have an opportunity?;
- Partner engagement processes; and
- How will we engage in the context of the new strategy?.

**Panel direction:** Option 2A be recommended as the preferred option, with inclusion of the below:

- There is a need to see what the gaps in engagement are, and what the benefit of engaging more fully would be.
- Provide clarity on a consultation and engagement plan for SmartGrowth, and provide a recommendation to the deliberations meeting that some work be undertaken after the strategy is adopted, to consider how best to engage with the community on implementation of the strategy.

Issue 8: SmartGrowth Partnership

- 2022 report on reviewed membership of the SmartGrowth Leadership Group;

**Panel direction:** That Issue 7 and 8 be brought together and frame the language positively (e.g. “keen to be engaging etc.”.)

## 5. Policy Environment – Craig Batchelar

The Panel discussed a topic of interest that was raised throughout the workshop, being the policy environment in New Zealand. The following discussion and panel direction took place:

Comments/Questions from the Panel:

- How do we deal with the changing policy environment in terms of the strategy?
- Ensuring that we develop a strategy that is right for the sub-region, that people subsequently look to as they are making policy and funding decisions.
- How do we take into account changes and ensure the strategy is not reliant on other people decisions?
- Do we need to engage assistance to carry out a risk assessment?
- Is there a way to mitigate or minimise the effects of the political environment on SmartGrowth’s work?

Comments from Craig Batchelar:

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- Policy changes have started to be identified that may have an effect on the policy. There is a need to monitor the decisions and evaluate the ramifications of these decisions.
- Some partners are addressing risks in their work already.

Direction from the Panel:

- Create a risk analysis/matrix across the key changes, to try to understand the impact of LTP's and Plan Changes etc., as well as Government policy changes and funding changes.
- Need to ensure our language is at a higher enough level regardless of key policy changes.

#### **6. General Questions – Craig Batchelar**

The Panel discussed general matters of concern or interest. The following discussion and panel direction took place:

Comments/Questions from the Panel:

- How much work has gone into the issue of water storage?
- Marine Spatial Planning – has any thought been given into this space?
- Has there been any work on the impacts of the pending Tauranga Moana settlement?
  - Ngai Te Rangi are looking to settle in the next 6 months, however, Ngai Te Rangi and the Tauranga Moana framework is unknown at this stage.

Comments from Craig Batchelar:

- There is some mention of marine planning in the strategy (in terms of The Port of Tauranga and shipping routes), but otherwise no mention in the strategy.



**7. Next Steps**

- Deliberations on 29 February 2024 and 1 March 2024.
- Recommendations are formed for SmartGrowth Leadership Group's meeting on 23 April 2024.
- Any changes between now and the adoption meeting need to be taken into account, along with the body of work as a result of the last two days of workshops.
- The topic leads have a meeting on 9 February 2024, to debrief the discussions.
- Site visit on 20 February 2024, with the addition of Te Puke West (industrial area). A report on this site visit will be presented at the deliberations meeting. A document will be provided on what the purpose of the site visits are for.
- It was requested that a meeting take place between the Panel to allow for questions/scope of the deliberations/preparation for the hearings, once the papers are released.
- Chairs report – ensure that the issues are addressed, cross organisationally there have been briefings, and that no major issues have arisen.

The workshop closed with the karakia from Te Pio Kawe.

The workshop closed at 2.52pm.

**Draft SmartGrowth Strategy 2023-2073**  
**Hearing Panel Site visit report**  
**20 February 2024**

Purpose of the site visits were for the panel to get a better understanding of each of the sites, including topography, site characteristics and understanding local context. The landowners / agents who met the panel on site provided general information about future development as recorded below.

The attendees for the day were:

- Andrew Turner
- Bill Wasley
- Deputy Mayor John Scrimgeour
- Matire Duncan (joined at Ohauiti at 9.20am)
- Te Pio Kawe
- Craig Batchelar (Strategic Advisor for SmartGrowth)
- Nichola Lennard (Technical Advisor for SmartGrowth)
- Tracey Miller (WBOPDC - support writing the site visit report).

Cr Paula Thompson and John McDonald were unable to attend the site visits.

The following sites were visited

Site location	Start	End
TCC	8am	
Belk Road / Tauriko West	8:45am	9am
Upper Ohauiti	9:10am	9.40am
Tara Road	9:50am	10am
Bell Road	10:10am	10:30am
Te Tumu	10:45am	12.20pm
TCC		1pm

**Site visit notes**

**Upper Belk Road / Tauriko West**

The Panel didn't stop at Tauriko West due to time constraints. The Panel drove down Belk Road to the furthest extent of the SDP area at the end of the plateau.

**Upper Ohauti****Photo 1 – Upper Ohauti****Upper Ohauti - 9.10am**

Carl Salmons (Maven) and 2 other landowners met us on site. The landowners spoke about the following:

- Close proximity of the rural urban boundary
- There are 2 remaining farming properties in the area (approx. 40ha in size)
- The area is largely already 'lifestyle' living as it is becoming less viable land for agricultural purposes.
- The natural characteristics of the land lent itself well to lifestyle zoning.
- Future development of the area would need to include vegetation on the steeper parts of the landform
- Options for walking and cycling opportunities are important
- Existing steep hills should remain, particularly those with historical iwi affiliation. E.g., Pukenui (recorded Pa site)
- The soil is viewed as good but the topography of the area makes it challenging.
- There are wider transportation matters that the Councils / SmartGrowth need to sort out. Pukemapu will cause transportation impacts in this area. Councils / SmartGrowth have the ability to look at the wider development area holistically and design a fit for purpose transportation solution for the wider area.
- A new school may be announced for the area soon.

**Tara Road**

10.05am

The Panel viewed the Tara Road land area from the van. There were no questions or comments raised. It was noted that the land is within the Tauranga City Council boundary now.

**Bell Road**

**Photo 2 - Bell Road –looking out towards development site**





**Photo 3 – Bell Road – looking over TEL**

**Bell Road - 10.10am**

The Panel met Rod Bailey from the Bell Road Partnership on the PEI preload site which provided a view of the proposed Bell Road development area and Wairakei UGA to the east.

Rod talked about the following:

- Noting the close proximity to future development / town centre development on the other side of the TEL
- Te Okuroa Drive future connection
- PEI link across the TEL to the town centre is important and will be in place by 2026.
- The site is approx. 115ha in area with potential for approximately 2,000 homes, light employment land, local neighbourhood centres, reserves and schools
- Comprehensive stormwater modelling has been undertaken
- Yield will be in the vicinity of 60 to 70% of land.
- Working on detailed engineering design at this stage.
- There is a future opportunity to extend over to the Hurst Property (another 100ha approx.).
- Comment from a panel member about the low lying nature of the land, Rod spoke about needing to import fill which would be done locally from Paengaroa, transported along the TEL.
- Another question from a panel member regarding the need for future upgrading of Bell Road, Rod spoke about how this would be needed in future.
- Bell Road Partnership is a single landowner and can turn on development quickly once consented.

- A question was raised by a panel member about housing typologies, Rod responded that a range of typologies would be needed including medium and high density housing around neighbourhood centres.
- Question was asked re any engagement with Waka Kotahi in terms of impact on the TEL. Rod noted that this hasn't occurred directly, being led by TCC.

Morning Tea Break 11am

#### Te Tumu



**Photo 4 – End of Te Tumu block looking towards Kaituna River**

#### Te Tumu - 11.30am

We met on site at the end of the landowner block nearest the Kaituna River (Geoff and Dianne Ford). Geoff and Dianne spoke about the following:

- The close proximity of the land to the sea and river, and that it was not low lying compared to other areas at Papamoa.
- Live, work, play philosophy is important.
- The only way to make density work is to have good amenity with good outlook, people need to be able to walk and cycle.
- Around 50% of the site is not developable but would be used for reserves, open space, walking and cycling etc.
- Connectivity via the Kaituna link is important.
- Have been working on development plans in this area for approx. 25 years.
- All of the landowners work well together.

- Plan to rezone and then sort out the infrastructure. Politicians won't buy into it without the land being zoned appropriately first.
- Plan to develop in 60ha stages.
- Important that the future community looks after the land, the wetland environment will bring the community together to enhance existing environment.
- Would like to cater for a range of housing typologies, smaller houses up to apartment style in time.

Scott Adams spoke about the Carrus block of land, which covered the following:

- Original plan to create lifestyle lots able to be re-subdivided in the future once urban zoning was in place. This was plan deferred with TCC not wanting this outcome ahead of urbanisation. Account of past planning commitment where urban zoning was intended to be in place by 2011, then in 2016.
- Need to get on and rezone the land to secure central government investment
- A question from a panel member was raised about the importance of connectivity over Kaituna for Carrus. Scott explained it is less important to Carrus as there are other access via Te Okuroa Drive and The Boulevard, however, they don't have an issue with it as long as Carrus don't need to fund it.
- Have previously based lot density on 21 dwellings p/ha but things have moved on since then
- Cost of construction is an important consideration when looking at dwellings per ha.
- Scott also noted that the cost of construction for higher density (4-5 storeys plus) is very high at the moment (\$7-8,000/m2) and therefore poses some challenges with small units costing over \$1M.

Jeff Fletcher spoke about the Te Tumu Kaituna 14 Trust land

- Malcolm Short was unable to attend today and puts in his apologies, acknowledging Matire Duncan as an owner of the 14 block.
- Trustee rotation policy now in place
- Working with TCC to explore opportunities to develop infrastructure for the block without selling land.
- Trustees are working well together to progress opportunities.
- Referred panel to Tumu/ Kaituna 14 Trust website where there is a lot of information available.
- Future dwelling numbers of approx. 1500, earmarked 57ha of commercial land.
- Site is 1.7km in length, 2km in depth.
- Currently dry stock and operative sand mine (Stevensons/Fulton Hogan).
- It is important to the Trustees that this block maintains cultural heritage, the owners want that to be distinctive and they want to be able to catalyse business opportunities.
- 52% is as developable land
- Walkway, cycleways, multimodal transport options are viewed as important.

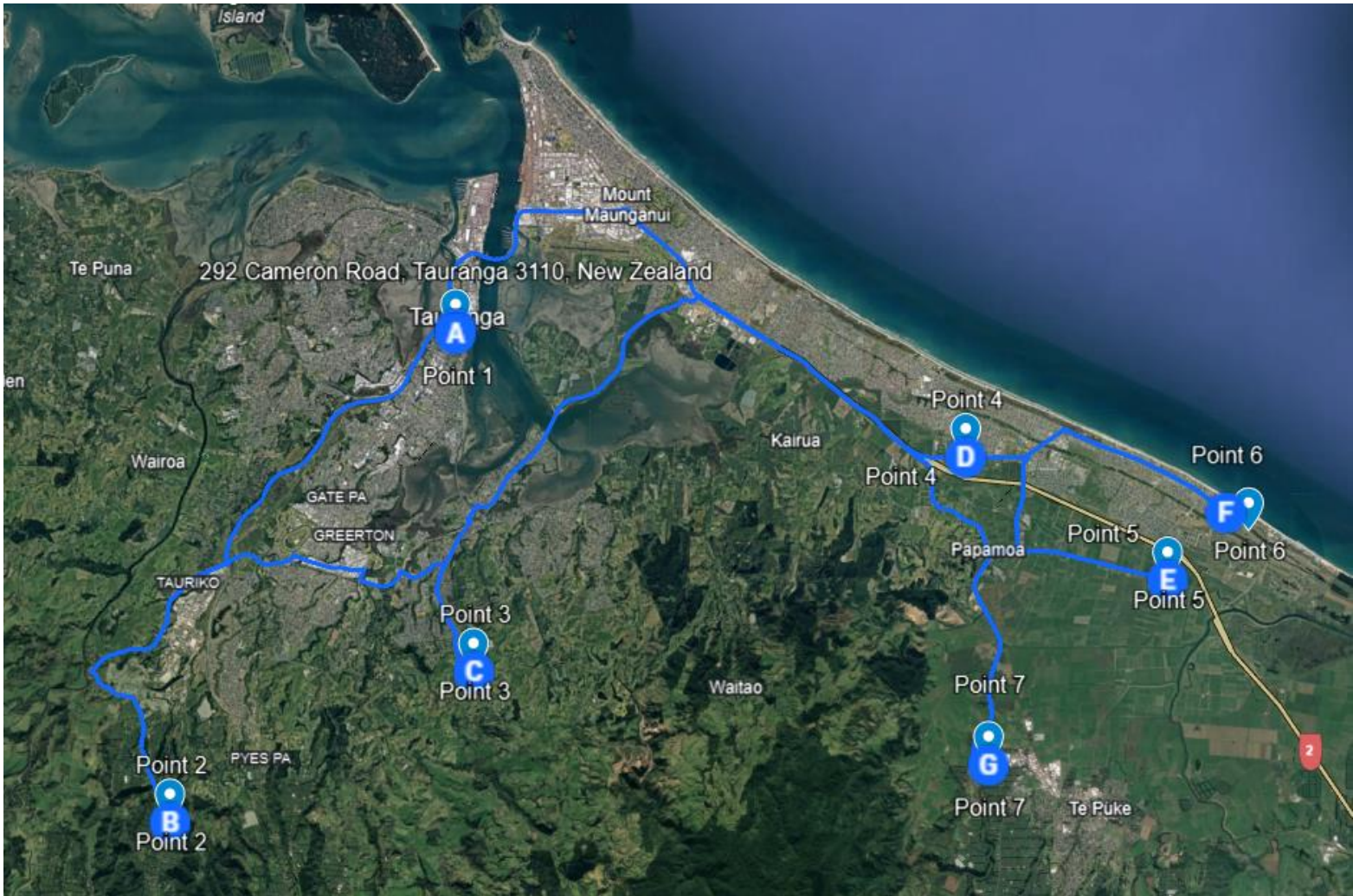
## SmartGrowth Hearings Panel - Site Visit Itinerary

Site	Arrive	Depart	Site Visit Time	Travel Time to next Site	Contact	Mobile	Notes
TCC		8.00am		30			
Belk Road/Tauriko West	8.30	8.50	20	20	No		View from road
Upper Ohauti	9.10	9.30	20	20	Carl Salmons	0275105154	<p>Rosa and I will join the group and take you through the sites. One representative of the landowners will also join to provide background.</p> <p>We suggest that we start at 412C Upper Ohauti Road and then work anti-clockwise around the properties.</p> <p>For the Ohauti area, see below location to meet to get a good view of the main part of one of the more significant properties (at 412C Upper Ohauti Road). Plan is to meet you at the cow shed (red asterix). We will be there from 9am. From there we can drive through to lookout point (green asterix).</p> <p>From this point you can see almost the entire Hunter Block, Riddington Block, Gollans, pa site, and even back to the Settlers Hall.</p>



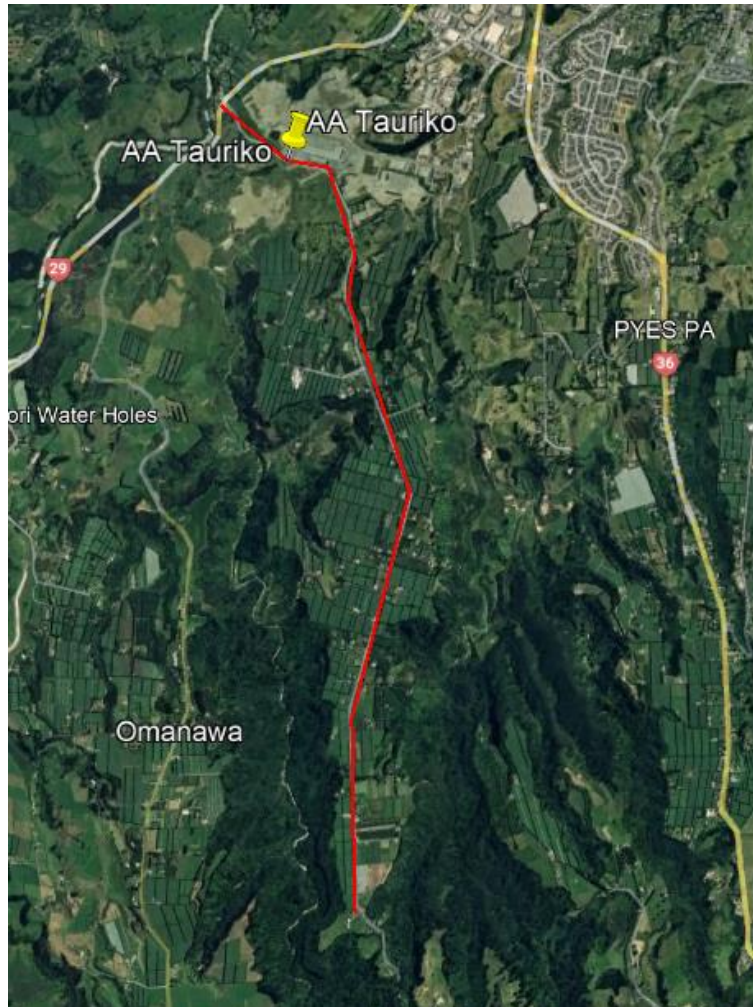
							We have undertaken a drone video of the whole area and will send that through to you in due course to support the site walkover.
Tara Road	9.50	10.00	10	10	Shae Crossan	0272173345	
Bell Road	10.10	10.30	20	15	Rod Bailey	021918849	View from PEI preload accessible from Bell Road. Also provides views to Te Tumu.
Te Tumu	10.45	11.30	45	15	Jeff Fletcher	021 495165	Includes Morning Tea
Te Puke West	11.45	12.00	15	30	No		View from road
TCC	12.30						

106km











Parcel Information

[Marks](#) [Vectors](#) [Parcels](#) [Survey Plans](#) [Company Data](#)

[Back](#)

Appellation:

Lot 12 DP 463581

Address:

412C Upper Ohauti Road, Ohauti, Tauranga

Land District:

South Auckland

Surveyed Area:

56.368 ha

Calculated Area:

56.4261 ha

Parcel Intent:

Fee Simple Title

Parcel Id:

7687630

Parcel Status:

Current

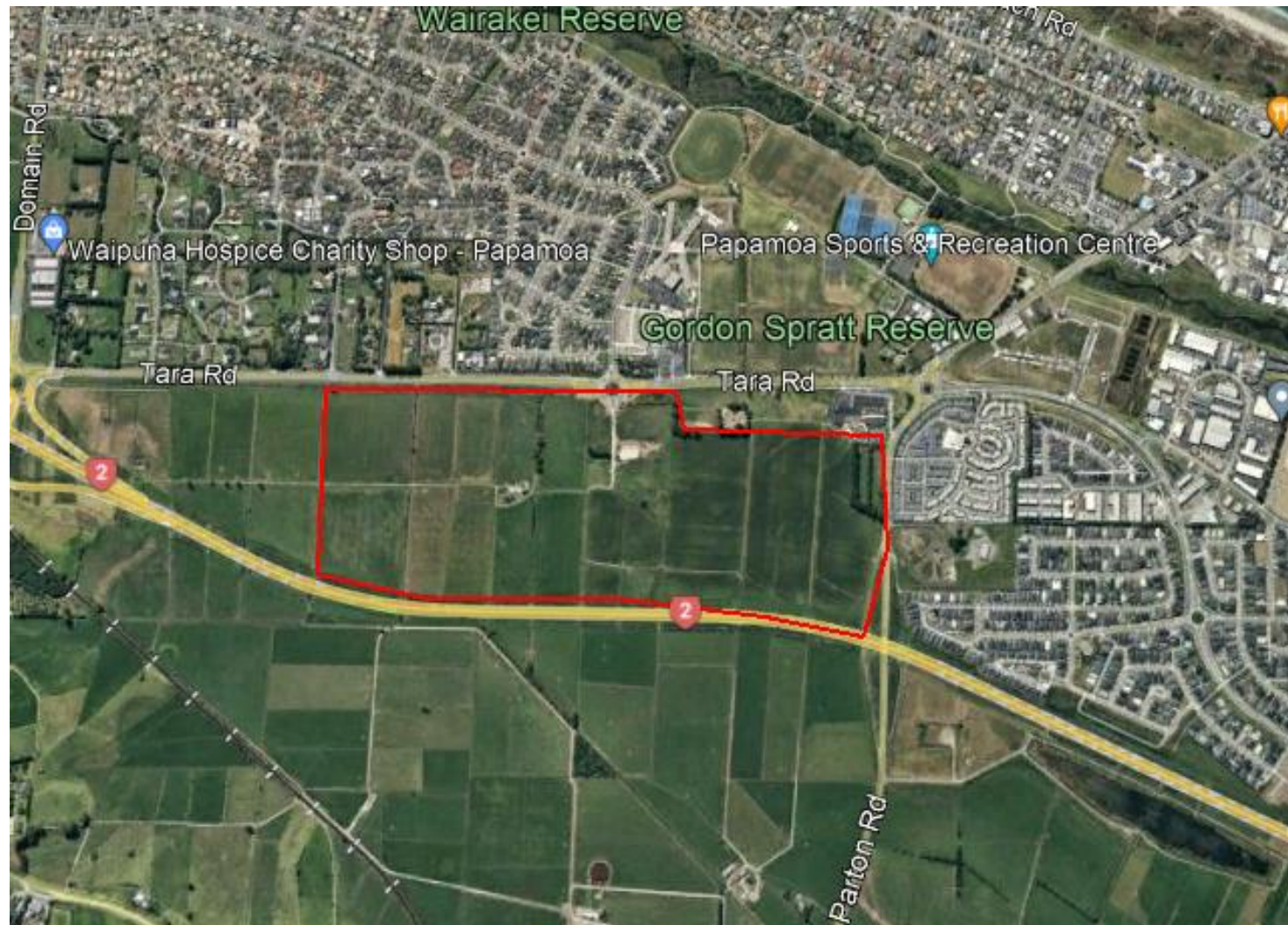
Titles:

[740123](#) [Grip](#) [LINZ](#)

Owners:

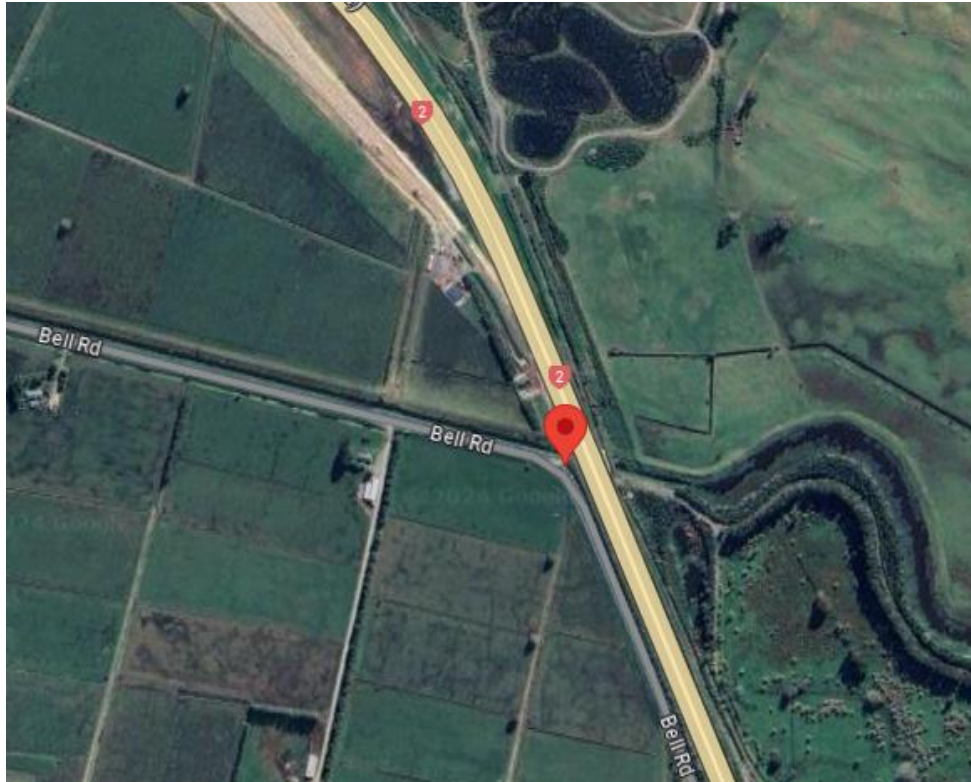
TJ and GA Hunter Limited



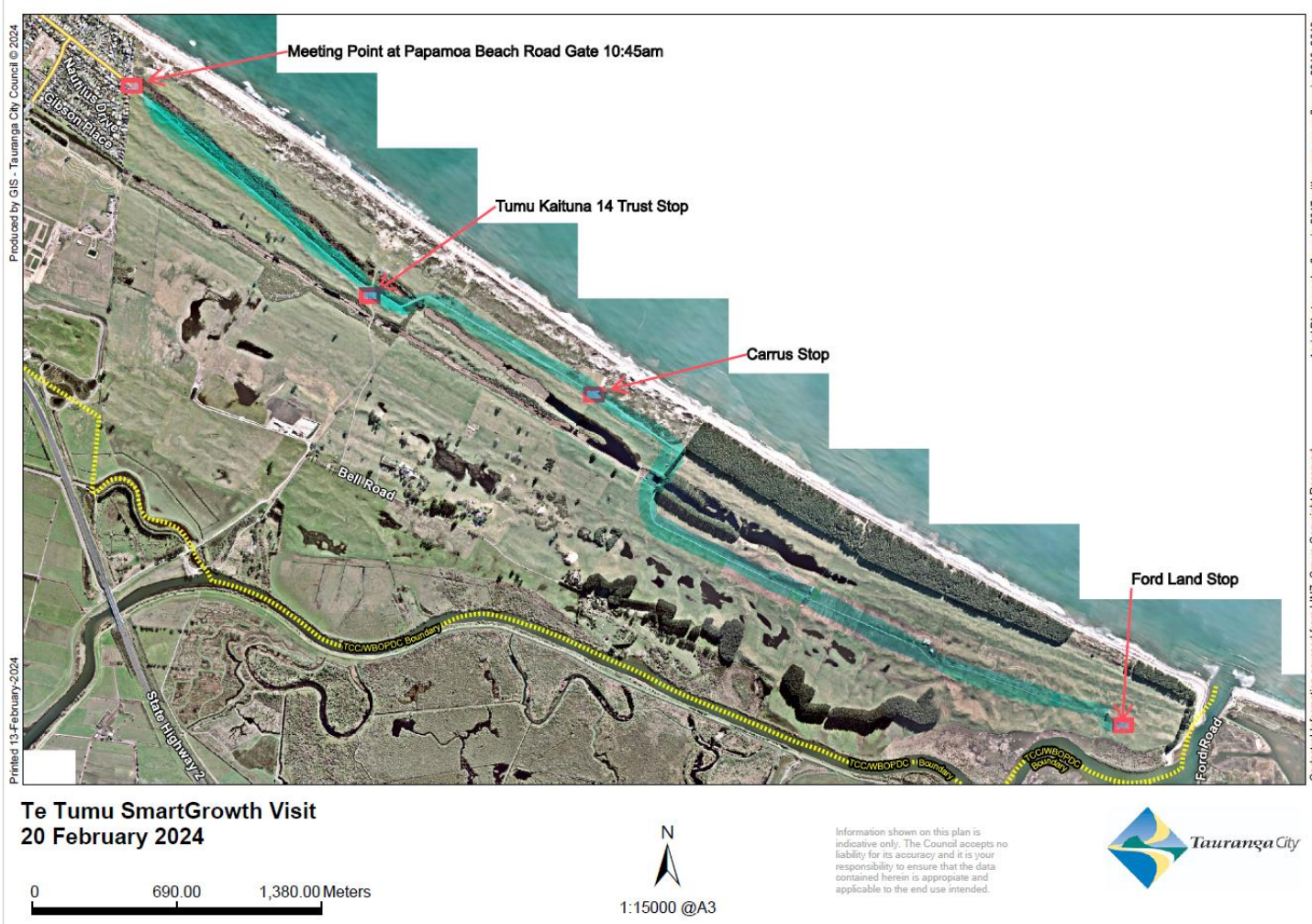














<b>Committee Name</b>	SmartGrowth Hearings Panel
<b>Committee Meeting Date</b>	29 February 2024
<b>Author (s)</b>	Craig Batchelar – SmartGrowth Strategic Advisor Nichola Lennard – Technical Adviser
<b>Purpose</b>	To assess implications of the Government’s proposed and actual policy and legislative changes for the draft SmartGrowth Strategy

## New Government Policy Changes

### Introduction

1. Following the hearings of submissions, the Hearings Panel requested that specific consideration be given to the possible implications and risks to the SmartGrowth Strategy from following the recent change in government and policy changes signaled in the Coalition Agreement, and any recent changes to local and regional policy.
2. A raft of significant policy changes is proposed, and some have already been initiated, under the National Policy Programme and Coalition Agreements between the National, New Zealand First and ACT Parties that are likely to have a direct influence on the SmartGrowth Strategy, FDS, and Implementation and Funding Plan.
3. The policy changes identified below will need to be monitored and addressed as their implications become clearer over the next few months.

### SmartGrowth Partnership

4. The Spatial Planning Act 2023 (SPA) was repealed in December 2023. The Spatial Planning Act (SPA) required each region to develop a regional spatial strategy that sets out the long-term issues, opportunities and challenges for development and the environment in the region. It worked alongside the Natural and Built Environment Act, the main replacement for the Resource Management Act 1991.
5. While the SPA has been repealed, the NPS UD remains in place and is supported by the new government. The NPS UD clearly mandates a joined-up approach to long term planning by defined Tier 1 and 2 authorities, with requirements for a Future Development Strategy and Implementation Plan.
6. The SmartGrowth partnership has Ministers currently appointed to the SLG:
  - Minister of Transport, Local Government: Simeon Brown
  - Minister for Housing, Infrastructure, Resource Management Reform: Chris Bishop



7. It is not known whether these arrangements will continue. However, for all other roles there is a reasonable expectation that the partnership will continue. A MHUD briefing to incoming Ministers included the following Priority Action:

*“Require joint regional spatial planning that is robust and has weight in council land-use decision-making and investment, to ensure enough land and infrastructure is available to support housing growth objectives.”*

8. Central government partners have a major role in the provision of growth infrastructure, and engagement through the partnership will continue to support effectiveness.
9. There is a low risk that the SmartGrowth Partnership will be affected.

## Resource Management System

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10. The Natural and Built Environment Act 2023 (NBA) was repealed in December 2023.
11. The temporary fast-track consenting regime has been retained. The next phase will be to introduce a permanent fast-track consenting process for locally, regionally, and nationally significant infrastructure and developments. This will be delivered through a bill introduced before 7 March 2024. The process will include a referral by Ministers for suitable projects. Referred projects will go to an Expert Panel, which will have limited ability to decline a project once referred. The proposed Bill would contain specific protections for Treaty settlements and other Treaty-related arrangements and commitments. The proposed Bill will set out a ‘one-stop shop’ process for approvals under a range of legislation, including the RMA.
12. Changes to the RMA are proposed to enable Councils to opt-out of the MDRS, with the need for councils to ratify any use of MDRS, including existing zones. The timing for this is unknown.
13. Changes in National Policy Statement direction under the RMA:
- Cease implementation of new Significant Natural Areas and seek advice on the operation of existing Significant Natural Areas as part of the Government’s programme to reform the Resource Management Act. (#31 of 49 prioritised actions)
  - Review and replace the National Policy Statement for Freshwater Management 2020 in this parliamentary term. This will be done through the RMA process for developing and amending national direction. The Government has extended the statutory deadline for councils to notify freshwater planning instruments to implement the NPS-FM by three years.
  - In the interim the Government has signalled its intention to progress changes to how the hierarchy of obligations contained in the Te Mana o te Wai provisions of the NPS-FM applies to consent applications and consent decisions. The intention is that these changes will be made through a separate RMA amendment bill this year.
  - Commence an urgent review into the implementation of the National Policy Statement on Indigenous Biodiversity before any implementation.
  - Re-focus the NPS-HPL by maintaining protection of the most productive soils (LUC 1 & 2), while excluding LUC-3 category land.
14. Although the details are not known, the general thrust of the RM systems changes is to remove or reduce constraints to development.



15. There is a low risk that the SmartGrowth implementation will be negatively affected by RM systems changes. However, some SmartGrowth partners and stakeholders may have apprehension about the potential lowering of environmental bottom lines, which may affect decision making and relationships.

## Housing

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16. Tier 1 and 2 councils will be required to zone enough developable land (housing capacity) for housing to meet their 30-year long-term demand estimates but make it available over the short-term (0-3 years), not long term. Greater development of greenfields land on city fringes, which is intended to bring down land prices and increase the supply of affordable housing prioritised actions).
17. Facilitation of housing growth will become an explicit goal of the Government Policy Statement on Land Transport, and one of the funding criteria in the National Land Transport Plan.
18. Enable more density in transit corridors with the requisite infrastructure to support growth, with more flexibility for councils to reduce intensification in suburbs without infrastructure capacity.
19. Housing performance incentives for councils – A \$1 billion fund for 'Build-for-Growth' incentive payments for councils that deliver more new housing (extra houses built in a Tier 1 and 2 Council above the long-term average for the Council). This includes considering sharing a portion of GST collected on new residential builds with councils.
20. Build-for-Growth funded by stopping existing programmes including KiwiBuild, the Affordable Housing Fund, Kāinga Ora land acquisition programme, and remaining funding from the Housing Acceleration Fund.
21. The detail of these policy changes is currently uncertain, but likely to be known in the short term.
22. The policy shift on zoning of land for housing may require the FDS to be amended to remove the current short-, medium-, and long-term staging of land release. However, infrastructure staging will still be needed to manage funding and finance, which will directly affect the actual release of land for development.
23. The Strategy already has a policy position that balance between intensification and greenfield development and seeks to provide certainty on long term delivery of zoning. There is a moderate risk to SmartGrowth housing policy delivery, principally in relation to reframing policies, and reconciling land zoning and infrastructure provision.
24. Some SmartGrowth partners and stakeholders may have apprehension about the potential for reduced focus on intensification of existing urban areas, although there are a range of views on this within the community.

## Infrastructure

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25. Establish a National Infrastructure Agency under the direction of relevant Ministers, to coordinate government funding, connect investors with New Zealand infrastructure, and improve funding, procurement, and delivery to:
- Prioritise regional and national projects of significance.
  - Facilitate or procure funding for regional and national projects of significance.
  - Procure from government agencies for appropriate Crown projects.



- Oversee procurement from the private sector.
26. Institute long-term city and regional infrastructure deals, allowing PPPs, tolling and value capture rating to fund infrastructure.
27. Build infrastructure with 13 new Roads of National Significant and four major public transport upgrades, including:
- Tauriko West State Highway 29: \$1.9 billion - expected commencement 4-10 years
  - Tākitimu Northern Link Stage Two: \$277 million - expected commencement 1-3 years
28. A fast-track consents process to make it easier to build the infrastructure New Zealand needs for the future.
29. Facilitate the development and efficiency of ports and strengthen international supply networks.
30. A 30-year infrastructure pipeline to deliver long-term certainty, enable more effective planning, and reduce project costs: The plan will signal what's required for the future, both in terms of the better use of existing assets, and new investment required. The plan will be broken down by city and region, reflecting the intention to develop City and Regional Deals.
31. There is a low risk that the SmartGrowth implementation will be negatively affected by the changes in infrastructure. The focus on enhanced infrastructure delivery presents more of an opportunity than a threat overall to Strategy implementation.
32. As with the RM System changes some SmartGrowth partners and stakeholders may have apprehension about the potential for reduced local participation in decision-making, which may affect decision making and relationships.

## Funding and Finance

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33. The Infrastructure Funding and Financing (IFF) Act will be reformed to reduce red tape for developers to fund infrastructure. Combined with targeted rates to fund greenfield developments, this will remove the need for councils to fund greenfield infrastructure from their balance sheets (#29 of 49 prioritised actions).
34. Councils will be required to declare that infrastructure for new greenfield development will be funded from rates and levies applied to the new development, instead of being subsidised by other communities.
35. Proposed value capture tools for New Zealand, mean that new state highways facilitating housing growth could be partly financed by levies on land unlocked by the road. The same could be true of major new public transport projects in urban centres.
36. Standardised Development Contributions would explore whether there is merit in standardising the methodology that local authorities can use when charging development contributions.
37. There is a low risk that the SmartGrowth implementation will be negatively affected by the changes in funding and financing. The focus on enhanced infrastructure delivery presents more of an opportunity than a threat overall to Strategy implementation.

## Climate Change – Emissions Reduction

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38. In December 2023 the Climate Change Commission provided advice on the second emissions reduction plan. The Commission's report is under consideration by the Government. The second emissions reduction plan is due to be published by the end of 2024 under the legislation.
39. The Transport System Plan (TSP) has been working on a Vehicles Kilometres Travelled Reduction Programme as part of the Emissions Reduction Plan. This has been funded from the Climate Emergency Response Fund by Waka Kotahi.
40. With the change in Government and associated transport priorities, Waka Kotahi has been advised that work will end on these programmes and there will be no further funding committed. The TSP is pivoting to a Transport System Optimisation programme.
41. There is a moderate risk to the SmartGrowth Strategy from, principally in relation to work in reframing policies and engagement with the community. Some SmartGrowth partners and stakeholders may have apprehension about the potential for reduced focus on emissions reduction, which may affect decision making and relationships.

## Conclusion

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42. In summary, the implications of policy changes are assessed as presenting low to moderate risk to the Strategy and its implementation:
  - Smart Growth Partnership: There is a low risk that the SmartGrowth Partnership will be affected;
  - Resource Management System: There is a low risk that SmartGrowth implementation will be negatively affected by RM systems changes;
  - Housing: There is a moderate risk to SmartGrowth housing policy delivery, principally in relation to reframing policies, and reconciling land zoning and infrastructure provision;
  - Infrastructure: There is a low risk that the SmartGrowth implementation will be negatively affected by the changes in infrastructure policy. The focus on enhanced infrastructure delivery presents more of an opportunity than a threat overall to Strategy implementation;
  - Funding and Financing: There is a low risk that the SmartGrowth implementation will be negatively affected by the changes in funding and financing. The focus on enhanced infrastructure delivery presents more of an opportunity than a threat overall to Strategy implementation;
  - Climate Change – Emissions Reduction: There is a moderate risk to the SmartGrowth Strategy from, principally in relation to work in reframing policies and engagement with the community.
43. Some SmartGrowth partners and stakeholders may have apprehension about the potential for:
  - the lowering of environmental bottom lines;
  - reduced focus on intensification of existing urban areas;
  - reduced local participation in decision-making;
  - reduced focus on emissions reduction.
 which may affect decision making and relationships.



44. The policy changes identified below will need to be monitored and addressed as their implications become clearer over the next few months.
45. There is no obvious case for deferring deliberations on submissions at this stage.

**Draft SmartGrowth Strategy: Recommended Changes to the Strategy**

<b>Issues and Options Paper</b>	<b>Amendment Sought</b> <u>(New text underlined)</u>	<b>Status</b> <i>(subject to Deliberations/Decisions)</i>
Areas to be Protected and Developed Carefully	<p>Include text in the introduction section (paragraph 2) to add a description of the benefits of protecting ecosystems as follows:</p> <p><u>“There is a scarcity of indigenous ecosystems, and it is important that existing ecosystems are protected. The ecological health of the natural environment plays a critical role in the functionality of urban spaces and the quality of life within them. In addition to the intrinsic value of these ecosystems, they provide important habitat for threatened, at risk and taonga species, help regulate climate stressors, improve resilience and well-being, and enable customary practices. People should also continue to have opportunities to readily access high quality natural environments in urban areas, such as parks and reserves, to enjoy the broad range of environmental and social benefits they offer.”</u></p>	
Areas to be Protected and Developed Carefully	<p>Include additional text in Key challenges #1 Pressures on the natural and cultural environment as follows:</p> <p><u>“The subregion faces some long-term environmental challenges including declining water quality, degradation of the local environment and alteration of natural ecosystems. These challenges are likely to be exacerbated by population and economic growth as well as the impact of climate change in the long-term. We will need to respond proactively to challenges faced, enabling protection and enhancement and restoration of areas including environmental and cultural assets along with avoiding development in higher risk or constrained locations. In continuing to foster economic growth and development we will need to ensure that natural assets continue to provide the critical resources and environmental services on which our well-being relies.”</u></p>	
Areas to be Protected and Developed Carefully	<p>Include an additional case study to highlight the protected status of the Kaimai Mamaku Forest Park, which is a taonga, connecting two regions, numerous iwi and hapū, conservation and recreation groups and livelihoods. Outline the importance of maintaining a healthy and functioning ecosystem.</p>	Provide case study text for Strategy editing.



Issues and Options Paper	Amendment Sought ( <u>New text underlined</u> )	Status ( <i>subject to Deliberations/Decisions</i> )
Areas to be Protected and Developed Carefully	<p>Provide additional text in Chapter 01 Areas to be protected and developed carefully - 'Introduction', after paragraph 6 as follows:</p> <p><i><u>"The maps included are presented at a high-level sub-regional scale for spatial planning purposes only and may be subject to change through other processes (such as updates to hazard mapping). Site-specific constraints and features to protect are managed and assessed through Regional and District planning policies and rules, and other statutory procedures such as Land Information Memoranda and Building Consents."</u></i></p>	
Climate resilience	<p>Amend paragraph text of key climate resilience challenge 3 as follows (changes shown in underlined text):</p> <p><i>"...We do not yet have a good understanding of how these long-term changes will affect people in these exposed locations, and we will need to be proactive in working with exposed communities, anticipate the support that may be required, and offer equitable solutions. <u>We will need to ensure any adaptation options are planned and implemented with meaningful involvement from communities.</u> We can manage further development in high hazard areas to mitigate exposure, while aiming to manage vulnerability".</i></p>	
Climate resilience	<p>Amend paragraph text of Principle 1, as follows (changes shown in underlined text):</p> <p><i>"This could happen through designing multi-modal transport into existing, and ahead of, new development. <u>Design and development of new buildings and community centres could facilitate reduced emissions outcomes through energy use, remote working patterns, carpooling, park and rides, active transport, and accessibility to frequent, reliable and innovative public transport services along public transport corridors.</u> Emissions could be captured through enhancing and restoring local ecosystems or establishing new ones".</i></p> <p>and</p> <p>Amend growth directive 3 as follows (changes shown in underlined text):</p> <p><i>"3. Development and infrastructure are planned to <u>encourage and enable emissions reductions and be resilient and adaptive to climate change and natural hazards</u>".</i></p>	

Issues and Options Paper	Amendment Sought ( <u>New text underlined</u> )	Status ( <i>subject to Deliberations/Decisions</i> )
Climate resilience	<p>Amend paragraph text of key climate resilience challenge 9 as follows (changes shown in underlined text):</p> <p><i>“... Resilience must also be considered in the context of long-term sustainability, such that even the most resilient communities may not be sustainable in the long term due to the impact of the rising seas on their communities. <u>In navigating these challenges, it is crucial to incorporate the prioritisation of health, safety, and wellbeing, particularly for the elderly and vulnerable population, into climate resilience development strategies</u>”.</i></p>	
Climate Resilience	<p>For clarity, note SmartGrowth’s support for the various climate action plans and initiatives. Amend paragraph text of regional, sub-regional and district responses as follows (changes shown in underlined text):</p> <p><i>“Initiatives and plans are also in place or in development at a regional and district level including the Bay of Plenty Regional Council Climate Change Action Plan 2021, Western Bay of Plenty District Council Climate Change Action Plan 2021 and Tauranga City Council Climate Action and Investment Plan and Nature and Biodiversity Action and Investment Plan. <u>This Strategy supports the implementation of the various climate action plans and initiatives for the western Bay of Plenty...</u>”</i></p>	
Social Infrastructure	<p>Add the following under 2024-2027 column:</p> <p><i>Reserve Management Plan reviews and implementation</i></p>	
Tangata Whenua	<p>Amend Transformational Shift 2 within the Strategy as follows:</p> <p><i>02. Marae as Centres and Opportunities for Whenua Māori</i></p> <p><i>Marae as cultural, social, and economic centres, activating the affordable development of housing on whenua Māori and opportunities for papakāinga (housing, education, social, hauora facilities). <u>This bottom-up, marae community-driven approach supports mana whenua practice and exercise of “ahi ka / ahikāroa” being the occupation of the whenua in a new and evolving context. Such an approach not only strengthens marae communities at the grassroots level but also empowers them to actively shape the development and decisions that impact their whenua, fostering self-determination and resilience for present and future generations.</u></i></p>	

Issues and Options Paper	Amendment Sought ( <u>New text underlined</u> )	Status ( <i>subject to Deliberations/Decisions</i> )
	<p>Amend and insert additional wording in Figure 2 as follows to address air quality:</p> <p>Insert a new circle titled “Environmental management” with the following associated bullet points in a text box:</p> <ul style="list-style-type: none"> <li>• <u>Mount Maunganui airshed management plan</u></li> <li>• <u>BOPRC monitoring programmes</u></li> <li>• <u>Local Spatial Plan actions</u></li> <li>• <u>Travel Demand management/behavioural change programmes</u></li> <li>• <u>Iwi and hapū management plans</u></li> <li>• <u>Regional Policy Statement</u></li> <li>• <u>Regional Plans</u></li> </ul> <p>Insert additional wording in the Part 3: The Spatial Plan- Chapter 04 Te Taiao – Our Environment, Key Challenges to include a new challenge as follows:</p> <p><u>Effect of existing activities and intensification on our environment:</u></p> <p><u>Our environment is polluted when substances or kinds of energy (noise, light, heat) enter it and cause harm. Although some pollutants occur naturally, in urban areas pollution comes mostly from human activities (such as industry, agriculture, urban development and transport) and can accumulate to harmful levels in air, land, freshwater, and marine environments. Pollutants can move in the air, in water, and through soil, often over large distances and long periods of time. Pinpointing the cause of pollution can be difficult. Some pollution comes from one place (e.g. emissions from a factory) while other pollution has many sources (e.g. vehicle emissions or agriculture practices). Pollution has a major effect on our environment, harming our ecosystems and our relationship with nature, and posing risks to human health. We need to manage the impact of pollution on people’s health and the environment, and improve environmental, cultural and social well-being outcomes.</u></p>	
Te Taiao - Environment	Provide additional text in Part 3: Chapter 04 – Te Taiao Our Environment to address growth impacts as follows:	Specific text to be provided for

Issues and Options Paper	Amendment Sought <u>(New text underlined)</u>	Status <i>(subject to Deliberations/Decisions)</i>
	<p>Insert additional text in Part 3: The Spatial Plan- Chapter 04 -Te Taiao Our Environment - Introduction to provide further clarification of 'Environmental Limits' and include a definition in the Appendix.</p> <p>Insert additional text in Part 3: The Spatial Plan- Chapter 04 Te Taiao Our Environment -Key Challenges as follows:</p> <p>Amend the environmental challenge #1 Natural Resource Limits, as follows:</p> <p><u>"As our sub-region grows, the pressure on the environmental resources increases. In particular, managing natural hazards, protecting highly productive land and managing water. Many of the sub-region's resources are facing growing pressures. Successive reports show that pressure on our climate, waterways, marine environment and land is mounting. As a sub-region, we need to invest back into the environment more than what we take out. This is an on-going challenge when the sub-region has high growth rates. We need to ensure that growth is efficient in its use of natural resources, cleaner and is resilient, accounting for natural hazards and the role of environmental management and nature resources in minimising risks."</u></p> <p>Include a new environmental challenge as follows:</p> <p><u>'Preserving the values of the coastal marine area':</u></p> <p><u>Our activities on land – agriculture, forestry, transport, and the growth of urban areas – create pollutants and have altered the state of many of our coastal ecosystems. Our connection to the marine environment through mahinga kai (traditional food gathering practices) and recreation has also been affected. Loss or degradation of ecosystems in the coastal marine area can decrease the benefits we receive from marine habitats in our estuaries and oceans, which include removing sediment and pollutants, mitigating the effects of climate change and providing nursery habitat for taonga species. Changes in marine biodiversity can affect how we value the ocean, and compromise the marine activities we enjoy like boating, fishing, and swimming. The loss or decline of our iconic and taonga species can negatively affect mahinga kai and the intergenerational transfer of mātauranga Māori and kaitiakitanga. We value the marine environment for social, economic,</u></p>	<p>'Environmental Limits' definition.</p>

Issues and Options Paper	Amendment Sought (New text underlined)	Status (subject to Deliberations/Decisions)
	<p><u>spiritual and cultural reasons and understanding the effects of these activities is crucial for managing our activities and minimising their effects.</u></p> <p>Include a new environmental challenge as follows:</p> <p><u>'Loss and degradation of indigenous biodiversity':</u></p> <p><u>Indigenous biodiversity is lost and degraded through pests, land fragmentation, land uses and development. Areas particularly vulnerable to incremental loss and cumulative effects are the ecosystems of wetlands, sand dunes, intact sequences of estuarine-freshwater-land habitats, harbour margins and areas with significance to Māori. Ecosystem services (the benefits we get from healthy ecosystems such as provisioning (e.g. food and fibre), purification and regulating ( e.g. air and water purification, flood or climate regulation) supporting (e.g. photosynthesis and nutrient cycling) and cultural (e.g. wairua/spiritual, recreational) services ) are often not well understood which can lead to inadequate protection and neglect. The reduction in biodiversity and ecosystem health can affect these services, many of which are essential to our well-being. We must place priority on maintaining, restoring, and enhancing biodiversity.</u></p> <p>Include the Climate Resilience principle <u>'Integrate and enhance local ecosystems and biodiversity'</u> in the grey integration box within Chapters 05 to 08 and Chapters 10 and 11.</p>	
Te Taiao - Environment	<p>Provide additional text in Part 3: Chapter 04 – Te Taiao Our Environment to address freshwater resources as follows:</p> <p>Amend Figure 2 as follows: Amend the blue circle titled 'NPS Freshwater Management' to remove 'NPS' and include the text 'Te Mana o te Wai' in the associated square box.</p> <p>Insert additional text in Part 3: The Spatial Plan- Chapter 04 Te Taiao – Our Environment – Introduction (after paragraph 4) as follows:</p> <p><u>The catchments in the sub-region are areas of land that drain water from the top of surrounding hills down into a river, stream, lake, wetland, estuary or the open coast. Catchments influence the biodiversity and ecology of waterbodies. However, activities on the land in a catchment can impact on water quality and quantity. A healthy water catchment provides high-quality drinking water and</u></p>	

Issues and Options Paper	Amendment Sought ( <u>New text underlined</u> )	Status ( <i>subject to Deliberations/Decisions</i> )
	<p><u>supports livelihoods. It also supports local ecosystems so plants, animals, fish and insects that depend on having healthy water can thrive and flourish. We need to continue to ensure that catchment-scale management and enhancement practices are prioritised to create positive outcomes for our environment.</u></p> <p>Rivers and streams provide a range of economic benefits and have important ecological, recreational, aesthetic, and cultural values. Uses of the rivers and streams include municipal and industrial water supply, waste disposal, irrigation, frost protection and hydro-generation. <u>Our rivers, streams, groundwater and wetlands are feeling the pressure of a growing population and land use changes. Water quality has deteriorated in some areas. This is affecting our fish and other aquatic life, drinking water supplies, mahinga kai and how we use water for recreation like swimming and fishing. When we protect the health of freshwater, the health and wellbeing of the wider environment and communities is ensured.</u></p> <p>Insert additional text in Part 3: The Spatial Plan- Chapter 04 Te Taiao – Our Environment -Key Challenges as follows:</p> <p>Additional text in Key Challenge #5 Achieving Ngā Wai ki Mauao me Maketū as follows:</p> <p><u>Catchments are at risk from increased water demand, intensification of industrial, commercial and agricultural activities, increased recreational demand and extreme climatic events. Catchments are dynamic systems and have interactions between freshwater and other environments. Land use planning is critical in managing various land uses in a catchment, thereby minimising conflicts and sustaining water quality and quantity for future generations. Ngā Wai ki Mauao me Maketū is an integrated approach that recognises the interconnectedness of the whole environment, and the interactions between the land, freshwater and the coastal area. Achieving integration can be difficult across a range of agencies and organisations with different functions, responsibilities and priorities. A key challenge will be identifying a suitable scale (e.g., sub-region vs catchment) where integration can be effectively implemented and managing cumulative impacts.</u></p>	

Issues and Options Paper	Amendment Sought ( <u>New text underlined</u> )	Status ( <i>subject to Deliberations/Decisions</i> )
	<p>Additional text in Key Challenge #7 <i>Implementing NPS Freshwater Management</i> as follows:</p> <p><i>Rivers, streams, wetlands, groundwater and geothermal resources contribute significantly to the sub-region's environmental, cultural, economic and social wellbeing. They offer opportunity for wildlife, recreation and amenity, stormwater management and connections between the places we live. <u>Te Mana o te Wai is a fundamental concept focused on restoring and preserving the balance between water (wai), the wider environment (taiao), and people (tāngata), now and in the future.</u> To safeguard the health of these water bodies, we need to ensure they are healthy, resilient and thriving for our community, flora and fauna.</i></p>	
Housing	<p>Include a new Housing System Growth Directive 8.</p> <p><u>"District Plans, policies, toolkits and funding programs enable housing for Māori on whenua Māori and barriers to delivery are actively addressed."</u></p>	
Housing	<p>Amend Growth Directive 6 to read.</p> <p><u>"Central government leads increase in public housing supply and aligns the typologies of new and existing housing to match the needs of the community."</u></p>	
Housing	<p>Update the housing systems challenges at page 112 positioned between the 9<sup>th</sup> Challenge and 10<sup>th</sup> Challenge:</p> <p><u>"Changing ethnic diversity in the sub region requires different housing market responses, (e.g., for multigenerational living).</u></p> <p>Add a new Housing System Growth Directive 9.</p> <p><u>"Ensure place-based housing plans clearly respond to the needs of an older and more ethnically diverse population."</u></p> <p>Amend the existing Housing system growth directive 2:</p>	

Issues and Options Paper	Amendment Sought (New text underlined)	Status (subject to Deliberations/Decisions)
	<p><u>2. Deliver the place-based housing plan through collaboration and leadership, including use of local impact investment, such as BOP Housing Equity Fund and via Quayside Holdings Ltd for example, to support delivery of social, affordable to rent and buy housing and housing on whenua Māori.</u></p> <p>Add to the Strategy's Housing Chapter on p.111:</p> <p><u>The Sub-Regional Housing Systems Plan builds on the previous SmartGrowth Housing Action Plan 2020 and incorporates strategy that will lead to deliverable actions."</u></p>	
Transport	<p>Make minor changes to the SmartGrowth Strategy to reflect existing and predicted demographic changes in the region for an aging population and planning for all abilities</p> <p>On page 117, paragraph 2, add:</p> <p><u>"Access includes catering for all ages and abilities, especially in light of anticipated demographic changes in the region. Councils have work underway in terms of infrastructure and service provision to reflect anticipated growth and demographic needs."</u></p>	
Transport	<p>Make the following textual changes to the SmartGrowth Strategy to clarify the importance of resilience of the transport network:</p> <ul style="list-style-type: none"> <li>• Add reference to "resilience studies, policies and plans that have been/are being developed by each of the SmartGrowth partners and the importance on building upon these".</li> <li>• Clarify that whilst "the UFTI Connected Centres diagram shows a single connection between centres, network planning considers more than one physical route which promotes a resilient network".</li> </ul> <p>Clarify that whilst the Connected Centres diagram shows a single connection between centres, network planning considers more than one physical route which promotes a resilient network</p>	C
Transport	<p>In addition to the targets on page 116 of the Strategy or the directives on page 118, include the importance of <u>'Reducing the impact of transport on air quality and emissions'</u> to cross-relate with the Te Taiao Environment and Climate Resilience chapters.</p>	



Issues and Options Paper	Amendment Sought ( <u>New text underlined</u> )	Status ( <i>subject to Deliberations/Decisions</i> )
Transport	<p>The terms or names of specific policies that have been affected by changes in government policy should be removed and instead focus on the objectives. This refers to the following:</p> <ul style="list-style-type: none"> <li>VKT Reduction Plans (vehicle kilometre travelled) on pages 74, 116, 158. Instead refer to <u>'improving mode choice'</u>, which aligns with the objectives of UFTI and the TSP.</li> <li>Road to Zero (safety programme) on page 164. Instead, refer to <u>'improving road safety'</u>.</li> </ul>	
Three Waters and other Infrastructure	<p>Amend the draft FDS text to reflect the changing status of water reform under the coalition government.</p> <p>Update page 122 of the strategy to remove reference to entities and replace with Local Water Done Well references with return of ownership back to local authorities.</p>	Confirm specific wording of change
Three Waters and other Infrastructure	<p>Provide additional text in the draft SmartGrowth Strategy and FDS that recognises the need for ongoing investigation and analysis of potential alternative water sources for growth and increased resiliency</p>	Confirm specific wording of change
Three Waters and other Infrastructure	<p>Add bullet points under "Key Three Waters and other infrastructure challenges" (page 124) to reference the need for reconsenting of existing water takes and add references to "Our Water Future" strategy</p>	
Three Waters and other Infrastructure	<p>Amend the draft SmartGrowth Strategy and FDS text to incorporate Powerco and Transpower distribution and transmission capacity with planned network expansion.</p> <ul style="list-style-type: none"> <li>Update Map 15 to differentiate the National Grid from the electricity distribution network.</li> <li>Add NPS-ET to requirements (page 47)</li> <li>Expand point 8 (page 124) to reference the Western Bay of Plenty Development Plan and note the increase in demands</li> </ul>	
Social Infrastructure	<p>Add a description of social infrastructure within the introduction section to Chapter 10 - Social Infrastructure and Wellbeing:</p> <p><i>"Social infrastructure includes those community facilities, services and networks that support individuals, families, groups and communities, such as public open space, parks and reserves,</i></p>	

Issues and Options Paper	Amendment Sought ( <u>New text underlined</u> )	Status ( <i>subject to Deliberations/Decisions</i> )
	<i>libraries, pools, community centres, indoor sports centres and halls, educational institutions, healthcare facilities and marae."</i>	
Social Infrastructure	Include a reference in Chapter 10 – Social Infrastructure and Wellbeing to link to Chapter 4 – Te Taiao – Our Environment which recognises open space, green space (parks and reserves, regional and sub-regional parks, walkways & cycleways, access to the environment).	
Social Infrastructure	Add an additional objective to Page 17 for social wellbeing:  <i><u>"Enable and support social infrastructure that is accessible and meets the needs of our community – where they can connect, socialise, learn and participate in a wide range of social, cultural, art, sporting and recreational activities, as well as broader support for community wellbeing. "</u></i>	
Social Infrastructure	Amend the Social infrastructure and well-being key challenges as follows:  <i>"3. Demographics and needs are continuing to change, increasing the need for further amenities to support higher living densities as well as those in need. We have an ageing population, but we also have an increasing number of young people, particularly in the Māori population. <u>Community members have a range of socio-economic experience, including people living in poverty.</u> Our public places need to adapt to our changing needs."</i>	
Social Infrastructure	Amend the Social infrastructure and well-being growth directives as follows:  <i>"1. <del>Community facilities are</del> Social infrastructure:  Is universally easy to use (<u>through all life stages, including for young, aging and disabled people with disabilities</u>).  Meets the social, demographic and cultural needs of the community it serves  Is multi-use and flexible to changing community needs.  Is safe and enjoyable spaces.  Is provided on an equitable basis"</i>	

Issues and Options Paper	Amendment Sought ( <u>New text underlined</u> )	Status ( <i>subject to Deliberations/Decisions</i> )
Social Infrastructure	<p>Including under the ‘network approach’ section on page 129, the following additions:</p> <p><u>Providing social infrastructure on a network approach should also be provided on an equitable basis. This means considering each level (‘sub-regional/citywide’ or ‘local’) having different requirements to reflect the size of the area both in terms of population and physical boundaries, the expectations of the community, and the makeup of the community. Understanding where deficits are in the network and the likely flow on effects from diminished or improved provision provides opportunity to enhance supply relative to demand and need. Each community has a different starting point in terms of what is currently provided and their priorities, demographics and deprivation profile. While the strategy sets the intent of what we want to achieve, how we achieve it on the ground might be different from community to community.</u></p>	
Social Infrastructure	<p>Amend the Social infrastructure and well-being key challenges as follows:</p> <p><u>“3. Demographics and needs are continuing to change, increasing the need for further amenities to support higher living densities as well as those in need. We have an ageing population, but we also have an increasing number of young people, particularly in the Māori population. Community members have a range of socio-economic experience, including people living in poverty. Our public places need to adapt to our changing needs.”</u></p>	
Social Infrastructure	Add cross reference Chapter 6 – Urban Form and Centres in the Chapter.	
Social Infrastructure	<p>Provide a reference in Chapter 10 – Social Infrastructure and Wellbeing to Chapter 3 – Climate Resilience, at p 128 recognising that social infrastructure provision will need to respond to challenges posed by climate change.</p> <p><u>“Social infrastructure also plays a role in supporting the response to natural hazards and emergency management.”</u></p>	
Social Infrastructure	<p>Add to the Climate resilience principles for Chapter 10 – Social Infrastructure and Wellbeing</p> <p><u>“integrate climate resilience”.</u></p>	
Economic Wellbeing	Add additional wording to Economic Development Directive number 6 as follows:	

Issues and Options Paper	Amendment Sought ( <u>New text underlined</u> )	Status ( <i>subject to Deliberations/Decisions</i> )
	<i>“Economic development – is integrated within sub-regional spatial planning; supports the Urban Form and Transport Initiative (UFTI) connected centres approach; supports environmental protection and enhancement; <u>collaborates</u> and takes account of wider regional and upper North Island economic plans.”</i>	
Economic Wellbeing	Add the data source for employment figures on page 136.	
FDS	Include reference to NPS-ET in the ‘Requirements’ diagram on page 47 and reference background papers and other information.	
FDS	Include reference to NPS-ET in the ‘Requirements’ diagram on page 47 and refer to background papers and other information.	
FDS	Add text to Part 4 (FDS), ‘Residential Growth Allocations for the next 30 years’ (page 146) as follows:  <i>“There is the ability for the staging of growth areas to change. In particular, certain growth areas may be brought forward in time provided infrastructure funding or other matters are addressed.</i>	
FDS	Add the following footnote to Te Tumu in the Residential Growth Allocations table:  <i>“Te Tumu remains a high priority growth area for the SmartGrowth Strategy. The timing of this area may be brought forward if infrastructure funding and other matters are addressed. SmartGrowth and the relevant councils will continue to work with the Te Tumu landowners on progressing this growth area.”</i>	
FDS	Clarify in Part 4 (page 145) of the Strategy that the FDS relates to urban development:  <i>“The FDS relates to urban development only and does not consider rural development.”</i>	
FDS	Add the following statement in Part 4 (FDS) at page 145:  <i>“It is the intention of the Strategy to achieve a more compact urban form through the Connected Centres Development Strategy. The aim is to target at least 40% of new development through intensification and infill over time.”</i>	

Issues and Options Paper	Amendment Sought ( <u>New text underlined</u> )	Status ( <i>subject to Deliberations/Decisions</i> )
FDS	<p>Amend the residential allocation table to acknowledge that <u>“both the Eastern Centre and Western Corridor (Upper Belk Road) may be needed within the 30 year timeframe”</u>.</p> <p>Add a range of <u>1,000 - 4,000 houses</u> into the long-term residential allocation column for the Eastern Centre and Upper Belk Road.</p> <p>Add a clear notation to the residential allocation table and on Map 18 that <u>“the timing for these areas is still subject to investigation”</u>.</p> <p>Amend maps to include Upper Belk as a Long-Term growth area.</p> <p>Clarify the terminology around ‘potential long-term growth area’ and ‘long-term growth areas’ – ensure the maps align with these terms.</p> <p>Add the following footnote to Map 18:  <u>“Further work is required to determine staging, spatial extent and mix of land uses for the Eastern Centre and Western Corridor (Upper Belk Road).”</u></p> <p>Recommend that the Western Corridor be added as a Priority Development Area.</p>	Some specific wording to be developed.
FDS	Clarify the terminology ‘potential long-term growth area’ and long-term growth areas.	
FDS	Add the following footnote to Map 18: Further work is required to determine staging, spatial extent and mix of land uses for the Eastern Centre and Upper Belk.	
FDS	Delete Map 19 (Western Bay of Plenty Housing) from the Strategy and include in the Implementation and Funding Plan rather than the FDS section of the Strategy.	
FDS	<p>Add the following text to Part 4 (FDS) to clarify effect of SmartGrowth and the FDS:</p> <p><i>“Local authorities must have regard to the FDS when preparing or changing RMA planning documents; and is strongly encouraged to use the relevant FDS to inform long-term plans, and particularly infrastructure strategies; regional land transport plans and any other relevant strategies and plans.”</i></p>	

Issues and Options Paper	Amendment Sought ( <u>New text underlined</u> )	Status ( <i>subject to Deliberations/Decisions</i> )																		
FDS Industrial Land	<p>Amend the draft FDS text to better clarify the potential long term growth areas for business land, as follows:</p> <p>Add a table to page 148 after the existing strategic industrial land allocations table to show the Business Employment Land Growth Allocations for the next 30 years as follows:</p> <p><i><u>"The following table outlines the potential additional business land allocations over the next 30 years and beyond, informed by the HBA and supporting desk-top assessments.</u></i></p> <table border="1"> <thead> <tr> <th><u>Potential Long-term Growth Area – Business Land</u></th><th><u>Allocation (hectares)</u></th><th><u>Delivery timing</u></th></tr> </thead> <tbody> <tr> <td><u>Upper Belk Road</u></td><td><u>150-200</u></td><td><u>Long-term (2034-2054)</u></td></tr> <tr> <td><u>Ōmokoroa</u></td><td><u>70</u></td><td><u>Long-term (2034-2054)</u></td></tr> <tr> <td><u>Pukemapu*</u></td><td><u>115</u></td><td><u>Post-2054</u></td></tr> <tr> <td><u>Rangiuru Business Park extension</u></td><td><u>45</u></td><td><u>Long-term (2034-2054)</u></td></tr> <tr> <td><u>Eastern growth corridor**</u></td><td><u>Unknown</u></td><td><u>Post-2054</u></td></tr> </tbody> </table> <p><small>* Pukemapu is subject to further assessment for urban purposes and feasibility</small></p> <p><small>** Several options will be investigated to identify which, if any, potential growth areas for business land are required in the Eastern growth corridor beyond the 30 year period of the FDS.</small></p> <p>Amend the text at page 149 (paragraphs 5, 6 and 7) as follows (text to be deleted shown <del>struckout</del>; text to be inserted shown <u>underlined</u>):</p> <p><i><u>"In addition to the above planned business land provision, a further 300 to 400 ha of greenfield land is required to support business (industrial) land uses within the sub-region over the next 30 years. Technical investigations have identified the following possible locations for future business land within the current growth corridors:</u></i></p> <ul style="list-style-type: none"> <li><i><u>■ Northern Corridor – Ōmokoroa/Apata</u></i></li> <li><i><u>■ Eastern Corridor – Domain Rd/Tara Road/Bell Road, Te Puke, Rangiuru</u></i></li> <li><i><u>■ Western Corridor – Belk Road /Ōmanawa, Pukemapu</u></i></li> </ul> <p><i><u>Some of these areas are also being investigated for potential residential and other land uses, for example the Belk Road plateau area.</u></i></p>	<u>Potential Long-term Growth Area – Business Land</u>	<u>Allocation (hectares)</u>	<u>Delivery timing</u>	<u>Upper Belk Road</u>	<u>150-200</u>	<u>Long-term (2034-2054)</u>	<u>Ōmokoroa</u>	<u>70</u>	<u>Long-term (2034-2054)</u>	<u>Pukemapu*</u>	<u>115</u>	<u>Post-2054</u>	<u>Rangiuru Business Park extension</u>	<u>45</u>	<u>Long-term (2034-2054)</u>	<u>Eastern growth corridor**</u>	<u>Unknown</u>	<u>Post-2054</u>	
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Issues and Options Paper	Amendment Sought ( <u>New text underlined</u> )	Status ( <i>subject to Deliberations/Decisions</i> )
	<p><del>Through more detailed desktop analysis, Ōmokoroa, Belk Road and Pukemapu have emerged as the preferred.</del> <u>The SmartGrowth Industrial Land Study has identified potential locations to provide for business land demand needs in the northern and western growth corridors at Ōmokoroa/Apata, Upper Belk Road and Pukemapu –Some of the other potential locations have been identified as having natural hazard, environmental or infrastructure servicing constraints. Potential business land locations in the Eastern growth corridor are not required within the period of the FDS. Possible sites have been identified at Wairākei South, Rangioru, Paengaroa and Te Puke.</u></p> <p><u>The locations of potential growth areas for business land are shown on Map 18 and are indicative only. For example, in the Northern growth corridor a potential growth area is identified in the general vicinity of Ōmokoroa and Apata adjacent to State Highway 2 for long-term consideration."</u></p>	
FDS Industrial Land	<p>Insert additional text to recognise existing industrial activities and their effects, as follows (text to be inserted shown <u>underlined</u>):</p> <p>Insert additional wording in Part 1: Introduction and Context - Economic Objectives to recognise and support existing industrial activities that provide for economic and housing growth:  <u>"Enable and support the continued establishment, operation and maintenance of existing industrial activities that contribute to the regional and national economy."</u></p> <p>Amend wording in Part 1: Introduction and Context - Sub-Regional Context- Marine Corridor to recognise industrial activities also require shipping links to and from the Port of Tauranga.</p> <p>Amend wording in Part 2: The Growth Challenge - Opportunities to recognise that industrial activities are an economic opportunity for the region.</p> <p>Amend wording in Part 3: The Spatial Plan - Chapter 06. Urban Form and Centres introduction to include "<u>construction materials</u>" as a key industry to the nationally significant Port of Tauranga.</p>	Confirm specific wording of change

Issues and Options Paper	Amendment Sought <u>(New text underlined)</u>	Status <i>(subject to Deliberations/Decisions)</i>
	<p>Insert additional wording in Part 3: The Spatial Plan - Chapter 07. Housing - Housing system growth directives that supports existing local industries that provide for construction materials that assist in housing delivery.</p> <p>Insert additional wording in the draft FDS at page 148 that recognises the impacts of existing heavy industry as follows:</p> <p><u><i>“The SmartGrowth Strategy seeks to reduce the impacts of existing industrial activities on the environment and the health of people living or working in proximity to those activities. Opportunities for the relocation of existing industrial activities to other locations, both within and outside the sub-region, are supported where they will assist in reducing those impacts”.</i></u></p>	
General	<p>Add the following additional text to “Changes and Opportunities”</p> <ul style="list-style-type: none"> <li>• <i>“high level of active awareness there is of the natural environment from most of our citizens”</i> to opportunities on page 40.</li> <li>• Add a statement on equitable outcomes to the social objectives on page 17</li> </ul>	Confirm specific wording of change





**Draft SmartGrowth Strategy: Record of Potential Changes to the Maps**

Record any changes that your topic paper is recommending to be made to the maps in the Strategy, noting that this will depend on final decisions during deliberations and may also depend on BOPRC GIS.

Topic Paper	Strategy Reference	Amendment Sought	Status <i>(to be completed following deliberations)</i>
EXAMPLE ONLY FDS	All Maps	Check the location of Paengaroa on all maps as it appears to be shown as Pongakawa	
Three Waters and Other Infrastructure	Map 15	Separate out the National Grid from local transmission is possible, ie make it clear by using a different colour where the National Grid is.	

**Draft SmartGrowth Strategy: Recommended Actions for Implementation and Funding Plan**

Topic	Recommended Action from IOP	Status (subject to Deliberations/Decisions)
Tangata Whenua	Review and improve the way the SmartGrowth partners work with hapū, marae, Iwi and Māori communities to achieve SmartGrowth outcomes.	
Tangata Whenua	future support and resourcing of tāngata whenua in the Marae as Centres programme. Implementation will need to be guided by the CTWF as well as Council Kaupapa Māori staff and partner forums. This will build on existing work and ensures that initiatives are adequately phased, resourced and supported.	
Te Taiao -Environment	Ensure the Implementation and Funding Plan recognises the SmartGrowth partnership continues to work alongside mana whenua, iwi, businesses, other stakeholders and community groups to enhance the effectiveness of air quality programmes and identify future aspirations around industrial and residential activity.	
Te Taiao -Environment	<p>Ensure the Implementation and Funding Plan introduction and background recognises:</p> <ul style="list-style-type: none"> <li>• Delivery of initiatives such as work programmes to preserve the values of the coastal marina area, BOPRC freshwater programme, BOPRC NPS-IB work programme and recognition of integrated workstreams involving tangata whenua, SmartGrowth partner councils, Department of Conservation, community groups (amongst others).</li> <li>• Recognises an integrated approach to the preparation and delivery of plans, strategies and programmes which address long-term needs of the sub-region to give effect to Te Mana o Te Wai.</li> <li>• Recognises that infrastructure investment must also be cognisant of iwi economic and environmental imperatives.</li> <li>• Continued collaboration of partners and stakeholders in the delivery of environmental management plans and programmes.</li> </ul>	
Te Taiao -Environment	Ensure the Implementation and Funding Plan recognises the SmartGrowth partnership, Ministry for the Environment and Te Whatu Ora continues to work alongside mana whenua, iwi, businesses, other stakeholders and community	

Topic	Recommended Action from IOP	Status (subject to Deliberations/Decisions)
	groups to enhance the effectiveness of environmental management plans and programmes and identify future aspirations around addressing the effects of polluting activities.	
Rural	Investigate existing provisions in the sub-region's rural and rural residential chapters to determine if the existing provisions are appropriate for enabling housing (additional, secondary and minor dwellings)	
Urban Form and Centres	Include an action in the Implementation and Funding Plan as follows: "Working with partners and key stakeholders, prepare and implement a Commercial Centres Hierarchy for the sub-region, to assist in future planning and decision making." This shall include assessing the status of Wairakei, Gate Pā and Tauranga Crossing, including collaboration and integration between SmartGrowth partners and key stakeholders, as appropriate.	
Housing	Strengthen Council-led integration and partnering between all players in the local housing system (councils, central government, private market housing developers and builders, community housing providers, and social service providers) around their respective roles in housing planning and provision. This will be led by the Housing Action Working Group, driving, and delivering on the sub regional Housing Systems Plan.	
Housing	The adopted Housing Action Plan actions have been absorbed into the sub regional Housing Systems Plan. The 'vehicle' for detailing how the Housing system growth directives will be actioned is the sub regional housing systems Plan. This has been drafted by the Housing Action Group and will be finalised and published once the Strategy is approved. The sub regional housing systems plan's implementation will be driven via the collaborative Housing Action Group, including the key stakeholders in housing in the subregion. These joined up approaches are seen as best practice for addressing complex systems issues such as housing.	
Housing	Develop monitoring and reporting framework for SmartGrowth sub regional Housing Systems Plan: referring the development of a monitoring and reporting framework for the sub regional housing systems plan to the Housing Action Group. Make no changes to the Strategy.	

Topic	Recommended Action from IOP	Status (subject to Deliberations/Decisions)
Transport	Undertake a Regional Passenger Rail Futureproofing, study, in collaboration with Kiwirail, utilising the existing railway network and subject to its results, prepare an investment plan to secure strategic land parcels to not make passenger rail impossible in future	
Transport	Undertake a joint business case for inter-regional rail with the Waikato RC, in collaboration with Kiwirail, utilising the existing railway network	
Transport	reflect the need to track and provide input to the projects that are underway in the region on infrastructure and service provisions as growth occurs and demographics change.	
FDS	A significant and separate implementation plan be worked through the Combined Tāngata Whenua Forum on the matter of Māori housing.	
FDS	Guidance on how 'unanticipated' or 'out of sequence' development will be dealt with.	
FDS	Actions to support a reduction in the development timeframes in the "lead time to Development" identified on page 144 of the Strategy needs	
FDS	Defer the consideration of Wairākei South for urban development and in the first instance, to consider catchment management options to manage natural hazard risk and ecology and water quality effects in the wider catchment including the Kaituna River. A whole of catchment approach to the consideration of possible future urban development scenarios within the Bell Road/Kaituna River catchment is required.	
FDS	Defer the consideration of Tara Rd for urban development and in the first instance, to consider catchment management options to manage natural hazard risk and ecology and water quality effects in the wider catchment including the Kaituna River. A whole of catchment approach to the consideration of possible future urban development scenarios within the Bell Road/Kaituna River catchment is required.	
FDS	Delete Map 19 (Western Bay of Plenty Housing) from the Strategy and include in the Implementation and Funding Plan rather than the FDS section of the Strategy.	

Topic	Recommended Action from IOP	Status (subject to Deliberations/Decisions)
FDS Industrial Land	Do not provide for new industrial land available in the vicinity of Te Puke but support enable consenting of the existing Te Puke West zoned land (A possible PDA?)	
General	SmartGrowth / FDS Implementation Office be established with adequate funding and resources to deliver the FDS.	
General	Require Regional & District Councils to collaborate and to reach solutions using a taskforce/working group tasked with identifying and implementing solutions to unlock land in a timely and efficient manner.	
General	Require review of delivery and cooperation between the Partners and their performance.	
General	Align zoning and plan provisions for industrial type zones with the National Planning Standards. Involve the Bay of Plenty Regional Council to address integration between land use and their and their regional plan provisions for air and water quality.	
General	Continued advocacy from SmartGrowth and its partners for greater central government investment in development enabling infrastructure.	
General	Use full range of different funding and finance models including options for public-private partnerships (PPPs).	
General	The matters raised in relation to membership of the SmartGrowth Leadership Group and re-establishment of the SmartGrowth Forums are referred to SLG for its consideration alongside the development of a Communications and Engagement Plan that will take the SG programme through implementation of the Strategy and lead up to a review in 2027.	

