



SmartGrowth Strategy 2023 - 2073

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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

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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?

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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 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 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.

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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?

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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 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

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 widelife 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 upby aware st that would 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 thepot

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 Tūmā 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 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.

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



TCC Drinking Water Supply Catchments

An Overview of Drinking Water Supply Catchment Management

Prepared by John Hickman

March 2015

Updated

July 2021

March 2023

What is a “Drinking Water Supply Catchment”?



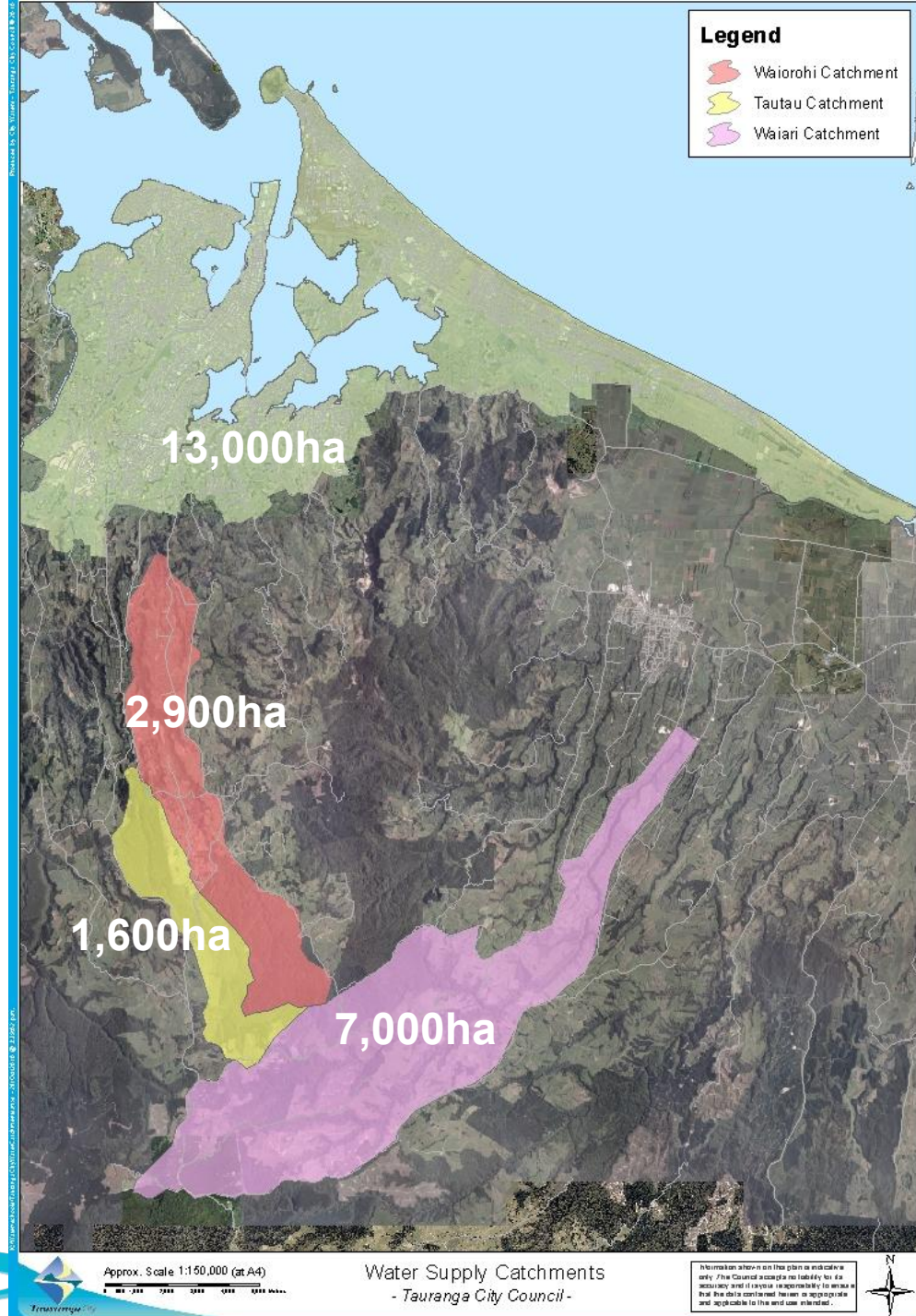
That area of land that:-

- 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 scrapyard)
- **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**

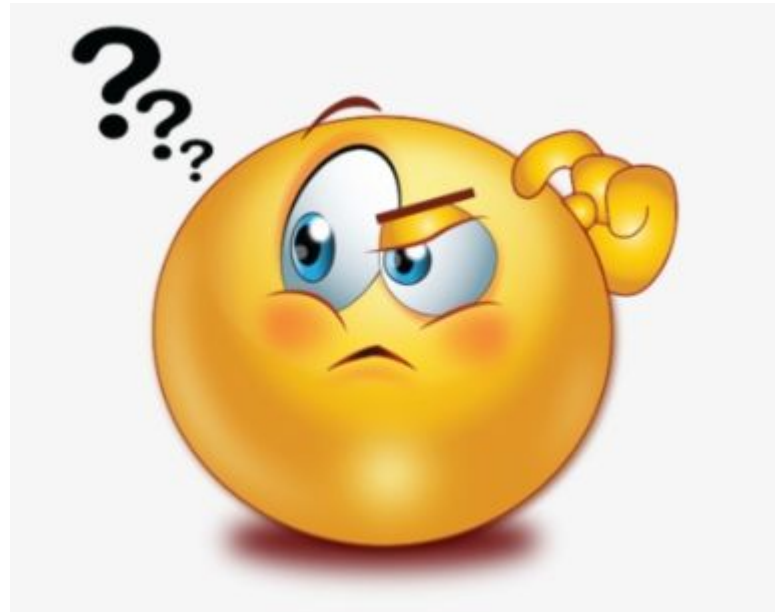
Causes of Contamination from Land Use/Source

- ☐ 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



The Integrated Approach

Political Environment

Economic Environment

Social Environment

Ecological Environment

Cultural Environment

Management of
Natural Resource

In a nutshell:- Know, understand, consider and network within the five environments active within the catchments to prevent and reverse degradation of the stream water quality and quantity.



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



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



A community needs a water supply, but also needs to be able to generate an income



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

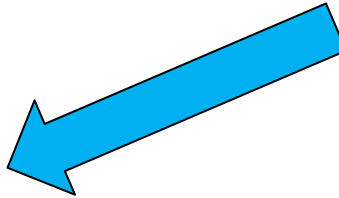
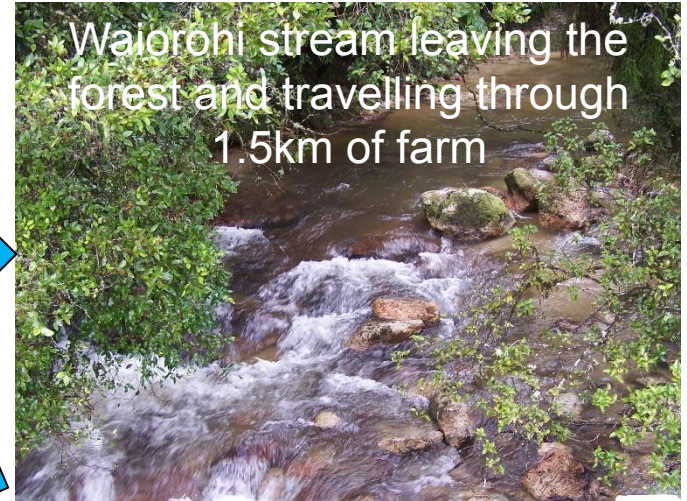
The Catchment Native Forests



- 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



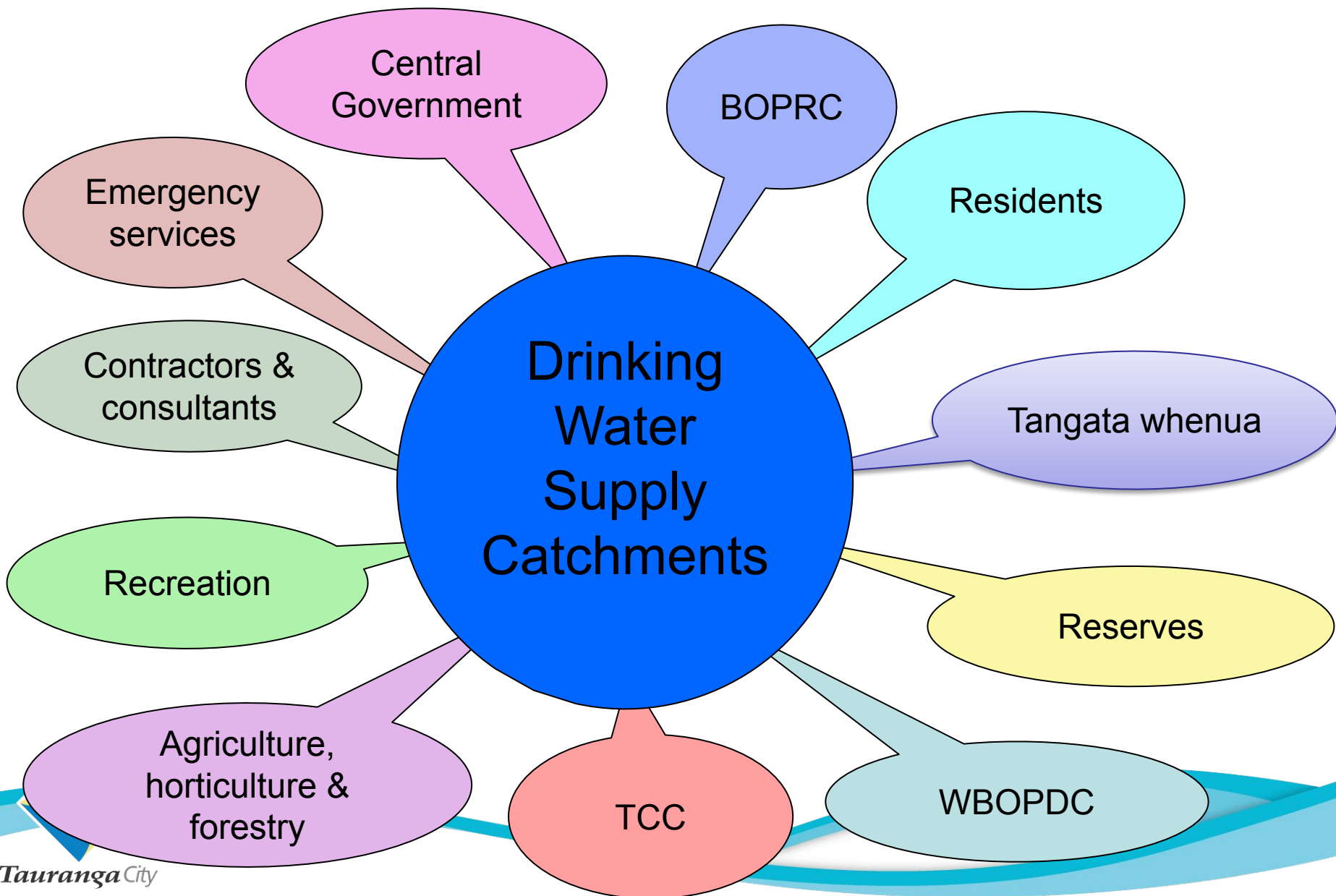
Barrier 2

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



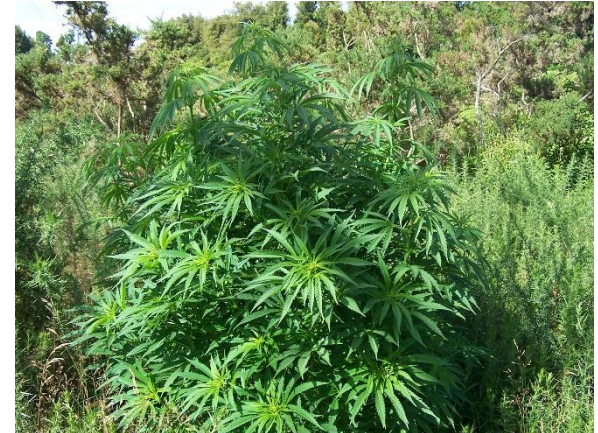
FTE Response - Chemical usage/spillage



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



Faecal matter

Herbicides
Pesticides

Riparian margins

Nutrients

Discharges



Dumps

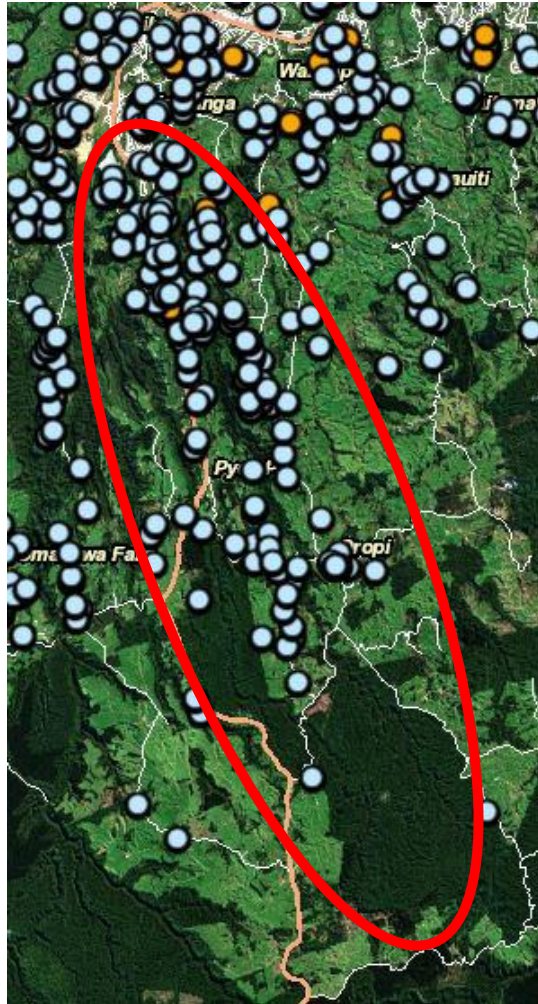
Farming across ephemeral waterways



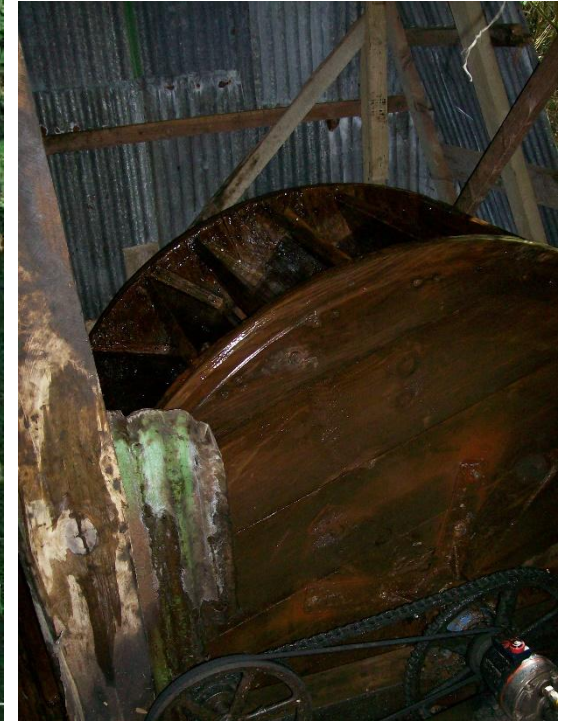
FTE Response - 3rd Party abstraction/Back feed



Ram pump Waiorohi



Boreholes in the catchments



Waterwheel Waiorohi



Electric pump Tautau

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.



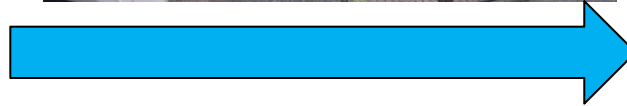
Mapping System contd.

- 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!



Tauranga City

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.

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.

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

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

Discretionary zoning so that Elders are acknowledged in Social Housing allocations. Currently elders can not get on the MSD social register.

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:

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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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

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

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:

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.

Discretionary zoning so that Elders are acknowledged in Social Housing allocations. Currently elders can not get on the MSD social register.

Housing:

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

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: 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:

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.

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.

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

Affordable homes – are homes that can be purchased by the medium income (\$32,000pa)

Social Housing Funding – priority should be by CHT (Community Housing Trust) not MSD

Discretionary zoning so that Elders are acknowledged in Social Housing allocations. Currently elders can not get on the MSD social register.

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).

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Green spaces – set a space per household

Transport:

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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

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?

Homes:

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.

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Plans base 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

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 deliterious 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 growtwh 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 of 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 an 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 tsuanami 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 21st 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

bennett.pauline50@gmail.com

ph. 027 472 8556

<https://www.decadeofhealthyageing.org/>



TAURANGA NATIONAL COUNCIL OF WOMEN.

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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, wherever 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.





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.



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.

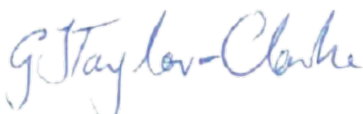
Nāku noa, nā



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

Tangata Whenua Collective (CTWF workshop)

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?

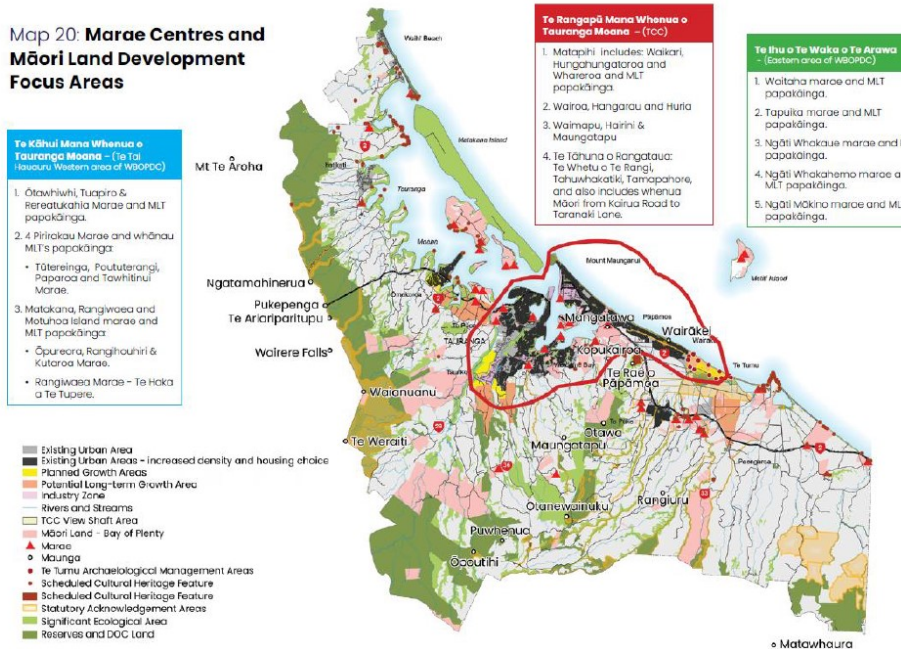
Feedback about sub-regional growth

- 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.

- 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

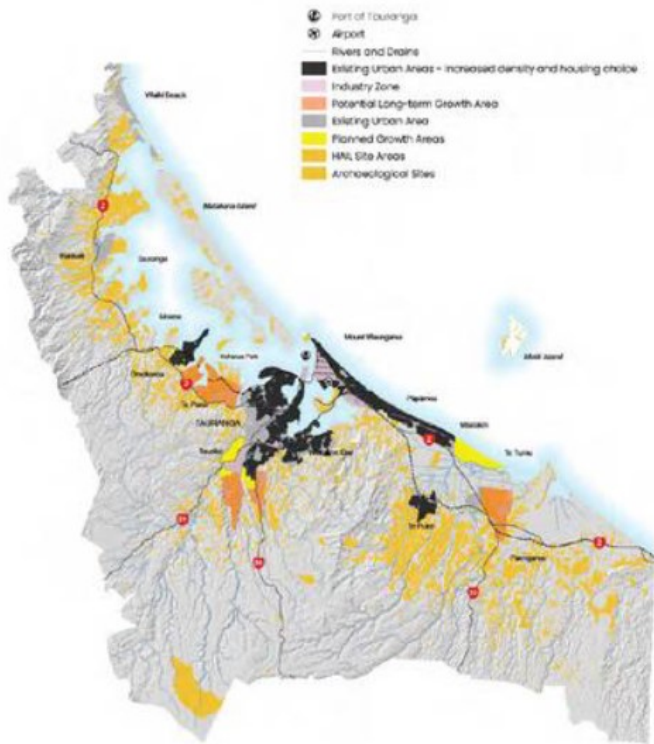
- The consultation process on the draft Strategy was too short.
- Strategy implementation is critical and needs to be resourced well.
- Support reference to CTWF outcomes and proposed Marae Centres and Māori Land Development Focus. SmartGrowth needs to ensure that this is adequately funded so that it 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.

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 large 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”)

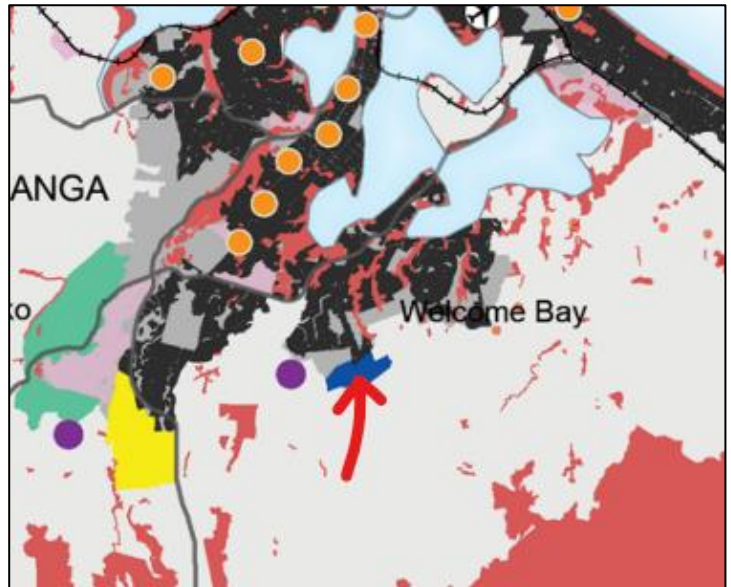
Submission Summary

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*).

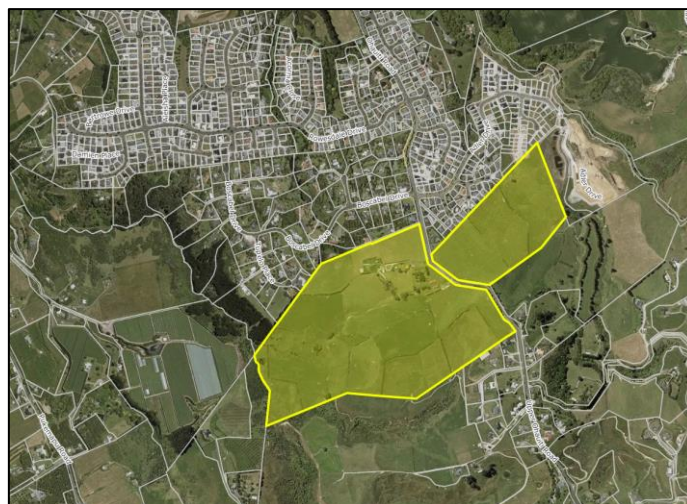
The Ohauiti South land is shown in Map 18 with blue shading. We have added the red arrow just to indicate the land that is the subject of this submission.

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 Ohauti Planning Study 2020

Approximately three years ago, Tauranga City Council prepared the *Welcome Bay and Ohauti Planning Study 2020* to better understand the infrastructure needs, options and costs to accommodate additional housing growth within the Welcome Bay and Ohauti 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 Ohauti urban growth area (Upper Ohauti)**'.*

We note that the area called "Upper Ohauti" in the *Welcome Bay and Ohauti Planning Study 2020* is the same as the area now called "Ohauti South" in the draft SmartGrowth Strategy/Future Development Strategy.

A recommendation of the *Welcome Bay and Ohauti 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 Ohauti 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 Roading, SH29A corridor upgrade 2024-2027), Wastewater, Ila Place WW upgrades (2024-2027) and Education, possible new primary provision in Ohauti (2034-2054).

There is an 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*



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 interests. 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.



IT ALL
STARTS
HERE.

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





Peter Cooney
Director
Classic Group

A thick, gold-colored diagonal line slanting upwards from left to right, positioned to the left of the slogan text.

**IT ALL
STARTS
HERE.**

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 Rangiora Business Park will create more jobs and added value.

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.

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



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



Jacqui 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

Wellington 6140

Email address: [REDACTED]

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.”*¹
- 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 GBs 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.

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.

- 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."*²
- 15 GB supports the recognition that there is strong demand for industrial land and supporting industrial growth.

² SGS –Section 3, 'Business Employment Land' - Page 106

- 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 issues³, 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,⁴ 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.⁵ 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.”*⁶
- 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:

³ including natural hazard risk, traffic congestion, port growth, cultural and social impacts, air quality and health concerns.

⁴ Objective 6 NPS UD

⁵ Policy 1 NPS UD (b)

⁶ Policy 2 NPS UD

- 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.*”⁸ (**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*⁹ 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*¹⁰ to recognise industrial activities also require shipping links to and from the Port.
 - iii. **Amend** wording in *Part 2: The Growth Challenge – Opportunities*¹¹ 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*¹² 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*¹³ 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.

⁷ Objective 1 NPS UD

⁸ NPS UD Policy 3

⁹ SGS, Page 17

¹⁰ SGS, Page 27


¹¹ SGS, Page 40

¹² SGS, Page 102

¹³ SGS, Page 114

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
Part 1: 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.	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.
Part 1: 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.	Amend the following ‘Marine corridor’ as follows: <ul style="list-style-type: none"> Shipping links to and from the Port of Tauranga for freight, industry and tourism Aquaculture Recreation
Part 2: 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.	Amend the penultimate bullet point on page 40 as follows: <ul style="list-style-type: none"> Building on the sub-region’s economic advantages – the Port of Tauranga, horticulture, food production, industrial activities and technology.
Part 3: 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.	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.
Part 3: 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	Insert new directives as follows:

SGS Section	Specific section/Page	Position	Reason for Feedback	Relief sought
			<p>Port and which provide for construction materials that assist in housing delivery.</p>	<ol style="list-style-type: none"> 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. 9. <u>Proactively supports local industrial activities that have a functional/operational need to locate ant the Port of Tauranga</u> 10. <u>Proactively support local industrial activities that provide housing construction materials to assist in housing delivery both regionally and nationally.</u>

Draft SmartGrowth Strategy 2023-73 & Future Development Strategy | Ford Land Holdings Pty Ltd Submission

Introduction	
Submitter: Ford Land Holdings Pty Ltd (FLH) Address for Service: C/- PO Box 13428 Tauranga 3141	Contact Person: Jeff Fletcher Email: [REDACTED]
Hearings: FLH wish to talk to their submission together with the Tumu Kaituna 14 Trust & Carrus Corporation on either the 4th or 5th December 2023.	
<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"> 1. Bay of Plenty Regional Policy Statement – 2007. 2. Tauranga City Plan as a Future Urban Zone – 2009. 3. SmartGrowth Strategy 2013. 4. Urban Form and Transport Initiative 2020. 5. Numerous publications linked to or associated with the above publications. <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><u>Key Submission Points</u></p> <ol style="list-style-type: none"> 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. 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. 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. D. FLH requests that the Kaituna Link transport connection from the eastern end of Te Tumu to Rangioru is included in the FDS and Map 18 as noted below. 	

Draft SmartGrowth Strategy 2023-73 & 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.

Draft SmartGrowth Strategy 2023-73 & Future Development Strategy | Ford Land Holdings Pty Ltd 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. 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>

Draft SmartGrowth Strategy 2023-73 & Future Development Strategy | Ford Land Holdings Pty Ltd Submission

SmartGrowth Strategy Reference / Section	Item / Area
Part 2: The Growth Challenge Challenges and Opportunities	
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 https://www.tumukaituna14.org.nz/video-minutes-owners-engagement-hui-5/</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>

Draft SmartGrowth Strategy 2023-73 & Future Development Strategy | Ford Land Holdings Pty Ltd Submission

SmartGrowth Strategy Reference / Section	Item / Area
Part 2: The Growth Challenge Challenges and Opportunities	
	<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>

Draft SmartGrowth Strategy 2023-73 & Future Development Strategy | Ford Land Holdings Pty Ltd Submission

SmartGrowth Strategy Reference / Section	Item / Area
Part 3: The Spatial Plan	
	<p><u>General:</u> 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> As detailed above, the Te Tumu Urban Growth Management Area:</p> <ol style="list-style-type: none"> a) Isn't in a 'No-Go' Area – refer Map 1. b) Has 'Go- Carefully' layers which have been investigated and addressed / accommodated in the structure planning for Te Tumu – refer Map 2. c) Has 'Go- Carefully'- Flooding areas which have been investigated and addressed / accommodated in the structure planning for Te Tumu – refer Map 2a. d) Doesn't contain Highly Productive Land / Soils – refer Map 2b. e) Isn't a 'Go- Carefully'- Hazardous Activities and Industries List area – refer Map 2c. f) Has identified Archaeological Sites which have been included in the in the structure planning for Te Tumu – refer Map 2c. g) Isn't a 'Go- Carefully'- Land Elevation area – refer Map 2d. h) Isn't a 'Go- Carefully'- Land Instability area – refer Map 2e. 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.
	<p><u>Chapter 02: Tāngata Whenua</u> 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. 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 https://www.tumukaituna14.org.nz/video-minutes-owners-engagement-hui-5/</p>

Draft SmartGrowth Strategy 2023-73 & Future Development Strategy | Ford Land Holdings Pty Ltd Submission

SmartGrowth Strategy Reference / Section	Item / Area
Part 3: The Spatial Plan	
	<p><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.</p>
	<p><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.</p>
	<p><u>Chapter 05: Rural</u> The land at Te Tumu is low quality rural land for Rural production activities</p>
	<p><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).</p>
	<p><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.</p>
	<p><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.</p>

Draft SmartGrowth Strategy 2023-73 & Future Development Strategy | Ford Land Holdings Pty Ltd 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> <ol style="list-style-type: none"> a) <u>Wastewater</u>: Rising mains and pump stations have been planned to connect Te Tumu to the Te Maunga Wastewater Treatment Plant. b) <u>Water</u>: Reservoirs and mains have been planned to connect Te Tumu to the new Waiari Water Treatment Plant. c) <u>Stormwater</u>: The Papamoia 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.
	<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>

Draft SmartGrowth Strategy 2023-73 & Future Development Strategy | Ford Land Holdings Pty Ltd Submission

Future Development Strategy (FDS) Submission	
Future Development Strategy Reference / Section	Item / Area / Submission
Connected Centres Development Strategy p 145 - 146	
	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.
Residential Growth Allocations for the Next 30 Years p 146 - 147	
	FLH requests that the Table on page 147 be amended as follows: <ul style="list-style-type: none"> 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
Residential Growth Allocations Beyond 30 Years p 148	
	FLH requests that the Table on page 148 be amended as follows: <ul style="list-style-type: none"> a) Te Tumu Dwelling Opportunity Post 2054; 2,000. This is based on the opportunity over time for increased residential densities to be achieved.
Business Employment Land p 148	
	FLH requests that the Table on page 148 be amended as follows: <ul style="list-style-type: none"> a) Te Tumu (Employment Land) Medium Term (2027-2034); 60ha. b) Te Tumu (Employment Land) Medium Term (2034-2054); 0ha.
Development Infrastructure – Eastern Corridor p 150 - 151	
	FLH requests that the Table on page 151 be amended as follows: <p><u>Add:</u></p> <ul style="list-style-type: none"> 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> b) Kaituna Link transport connection from the eastern end of Te Tumu to Rangioru; <i>Long Term.</i> 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> d) Establishment of a new co-educational secondary school; <i>Medium Term, Subject to Bus Case.</i> e) Establishment of a new primary school; <i>Medium Term, Subject to Business Case.</i> <p><u>Amend:</u></p> <ul style="list-style-type: none"> a) Te Tumu Trunk Mains to read <i>Te Tumu Water Trunk Mains.</i>

Draft SmartGrowth Strategy 2023-73 & Future Development Strategy | Ford Land Holdings Pty Ltd Submission

Future Development Strategy Reference / Section	Item / Area / Submission
Future Development Strategy p 154 - 155	
	<p>FLH requests that:</p> <ol style="list-style-type: none"> a) Map 18 on page 154 be amended to show Te Tumu moved to <i>Medium Term (2027-2034)</i>. 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 <i>Potential 6,100+ dwellings</i>.
Implementing the Strategy p 157 - 162	
	<p>The implementation of the FDS is vital to:</p> <ol style="list-style-type: none"> 1. Ensure that there is a multi-agency coordinated plan to deliver the FDS outcomes within the nominated timelines. 2. Provide certainty for public and private sector investment. 3. Monitor and measure the FDS. 4. Enable long term labour, materials and natural resources planning and investment to deliver the infrastructure and built form outcomes sought in the FDS. <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"> a) A full Project Plan and Resourcing Plan be prepared for the FDS; and 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.
Appendices Appendix 1 Sub-Region Wide p 154 - 155	
	<p>FLH requests that:</p> <ol style="list-style-type: none"> a) The Public Transport Item has a new item; <i>PT connections Tauranga to Papamoa East Medium Term (2027-2034)</i>. b) The Community Facilities / Social Infrastructure Item has a new item; <i>Active Reserve at Papamoa East – Te Tumu Medium Term (2027-2034)</i>.

Draft SmartGrowth Strategy 2023-73 & 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"> a) The Public Transport Item has a new item; <i>PT connections Tauranga to Papamoa East Medium Term (2027-2034).</i> b) The Public Transport Item has a new item; <i>Te Tumu Collector Roads in the 2027-2034 period.</i> c) The Road Network Item has a new item; <i>Te Tumu Collector Roads in the 2027-2034 period.</i> d) The Road Network Item has a new item; <i>Te Tumu Structure Plan Projects in the 2027-2034 period.</i> e) The Road Network Item has a new item; <i>Kaituna Link Transport Project in the 2034-2054 period.</i> f) The Wastewater Item has a new item; <i>Te Tumu Structure Plan Projects in the 2027-2034 period.</i> g) The Water Supply Item has a new item; <i>Te Tumu Structure Plan Projects in the 2027-2034 period.</i> h) The Stormwater Item has the item; a new item; <i>Te Tumu Structure Plan Projects in the 2027-2034 period.</i> i) The Stormwater Item has the item; <i>Wairakei to Kaituna Overflow – Phase 2 moved to 2027-2034.</i> j) The Community Facilities / Social Infrastructure Item has a new item; <i>Active Reserve at Papamoa East – Te Tumu Medium Term (2027-2034).</i> 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> l) The Education Item has a new item; <i>New primary school and Kura at Papamoa East – Te Tumu Medium Term (2027-2034).</i>

Draft SmartGrowth Strategy 2023-73 & Future Development Strategy | Tumu Kaituna 14 Trust Submission

Introduction	
Submitter: Tumu Kaituna 14 Trust (TK14) Address for Service: C/- PO Box 13428 Tauranga 3141	Contact Person: Jeff Fletcher Email: [REDACTED]
Hearings: TK14 wish to talk to their submission together with Ford Land Holdings & Carrus Corporation on either the 4th or 5th December 2023.	
<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"> 1. Bay of Plenty Regional Policy Statement – 2007. 2. Tauranga City Plan as a Future Urban Zone – 2009. 3. SmartGrowth Strategy 2013. 4. Urban Form and Transport Initiative 2020. 5. Numerous publications linked to or associated with the above publications. <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> <p><u>Key Submission Points</u></p> <ol style="list-style-type: none"> 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. 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. 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. 	

Draft SmartGrowth Strategy 2023-73 & 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.

Draft SmartGrowth Strategy 2023-73 & 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>

Draft SmartGrowth Strategy 2023-73 & Future Development Strategy | Tumu Kaituna 14 Trust Submission

SmartGrowth Strategy Reference / Section	Item / Area
Part 2: The Growth Challenge Challenges and Opportunities	
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 https://www.tumukaituna14.org.nz/our-vision/ 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 https://www.tumukaituna14.org.nz/video-minutes-owners-engagement-hui-5/</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>

Draft SmartGrowth Strategy 2023-73 & Future Development Strategy | Tumu Kaituna 14 Trust Submission

SmartGrowth Strategy Reference / Section	Item / Area
Part 2: The Growth Challenge Challenges and Opportunities	
	<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>

Draft SmartGrowth Strategy 2023-73 & Future Development Strategy | Tumu Kaituna 14 Trust Submission

SmartGrowth Strategy Reference / Section	Item / Area
Part 3: The Spatial Plan	
	<p><u>General:</u> 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> As detailed above, the Te Tumu Urban Growth Management Area:</p> <ol style="list-style-type: none"> a) Isn't in a 'No-Go' Area – refer Map 1. b) Has 'Go- Carefully' layers which have been investigated and addressed / accommodated in the structure planning for Te Tumu – refer Map 2. c) Has 'Go- Carefully'- Flooding areas which have been investigated and addressed / accommodated in the structure planning for Te Tumu – refer Map 2a. d) Doesn't contain Highly Productive Land / Soils – refer Map 2b. e) Isn't a 'Go- Carefully'- Hazardous Activities and Industries List area – refer Map 2c. f) Has identified Archaeological Sites which have been included in the in the structure planning for Te Tumu – refer Map 2c. g) Isn't a 'Go- Carefully'- Land Elevation area – refer Map 2d. h) Isn't a 'Go- Carefully'- Land Instability area – refer Map 2e. 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.
	<p><u>Chapter 02: Tāngata Whenua</u> 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. 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. The TK14 Trust Vision can be viewed at https://www.tumukaituna14.org.nz/our-vision/ 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 https://www.tumukaituna14.org.nz/video-minutes-owners-engagement-hui-5/</p>

Draft SmartGrowth Strategy 2023-73 & Future Development Strategy | Tumu Kaituna 14 Trust Submission

SmartGrowth Strategy Reference / Section	Item / Area
Part 3: The Spatial Plan	
	<p><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.</p>
	<p><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.</p>
	<p><u>Chapter 05: Rural</u> The land at Te Tumu is low quality rural land for Rural production activities</p>
	<p><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).</p>
	<p><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.</p>
	<p><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.</p>

Draft SmartGrowth Strategy 2023-73 & 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> <ol style="list-style-type: none"> <u>Wastewater</u>: Rising mains and pump stations have been planned to connect Te Tumu to the Te Maunga Wastewater Treatment Plant. <u>Water</u>: Reservoirs and mains have been planned to connect Te Tumu to the new Waiari Water Treatment Plant. <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.
	<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>

Draft SmartGrowth Strategy 2023-73 & Future Development Strategy | Tumu Kaituna 14 Trust Submission

Future Development Strategy (FDS) Submission	
Future Development Strategy Reference / Section	Item / Area / Submission
Connected Centres Development Strategy p 145 - 146	
	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.
Residential Growth Allocations for the Next 30 Years p 146 - 147	
	TK14 requests that the Table on page 147 be amended as follows: <ul style="list-style-type: none"> 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
Residential Growth Allocations Beyond 30 Years p 148	
	TK14 requests that the Table on page 148 be amended as follows: <ul style="list-style-type: none"> a) Te Tumu Dwelling Opportunity Post 2054; 2,000. This is based on the opportunity over time for increased residential densities to be achieved.
Business Employment Land p 148	
	TK14 requests that the Table on page 148 be amended as follows: <ul style="list-style-type: none"> a) Te Tumu (Employment Land) Medium Term (2027-2034); 60ha. b) Te Tumu (Employment Land) Medium Term (2034-2054); 0ha.
Development Infrastructure – Eastern Corridor p 150 - 151	
	TK14 requests that the Table on page 151 be amended as follows: <p><u>Add:</u></p> <ul style="list-style-type: none"> 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> 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> c) Establishment of a new co-educational secondary school and Kura; <i>Medium Term, Subject to Business Case.</i> d) Establishment of a new primary school and Kura; <i>Medium Term, Subject to Business Case.</i> <p><u>Amend:</u></p> <ul style="list-style-type: none"> a) Te Tumu Trunk Mains to read <i>Te Tumu Water Trunk Mains.</i>

Draft SmartGrowth Strategy 2023-73 & Future Development Strategy | Tumu Kaituna 14 Trust Submission

Future Development Strategy Reference / Section	Item / Area / Submission
Future Development Strategy p 154 - 155	
	TK14 requests that: <ol style="list-style-type: none"> a) Map 18 on page 154 be amended to show Te Tumu moved to <i>Medium Term (2027-2034)</i>. b) Map 19 on page 155 be amended to show Te Tumu with a <i>Potential 6,100+ dwellings</i>.
Implementing the Strategy p 157 - 162	
	<p>The implementation of the FDS is vital to:</p> <ol style="list-style-type: none"> 1. Ensure that there is a multi-agency coordinated plan to deliver the FDS outcomes within the nominated timelines. 2. Provide certainty for public and private sector investment. 3. Monitor and measure the FDS. 4. Enable long term labour, materials and natural resources planning and investment to deliver the infrastructure and built form outcomes sought in the FDS. <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"> a) A full Project Plan and Resourcing Plan be prepared for the FDS; and 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.
Appendices Appendix 1 Sub-Region Wide p 154 - 155	
	TK14 requests that: <ol style="list-style-type: none"> a) The Public Transport Item has a new item; <i>PT connections Tauranga to Papamoa East Medium Term (2027-2034)</i>. b) The Community Facilities / Social Infrastructure Item has a new item; <i>Active Reserve at Papamoa East – Te Tumu Medium Term (2027-2034)</i>.

Draft SmartGrowth Strategy 2023-73 & 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"> a) The Public Transport Item has a new item; <i>PT connections Tauranga to Papamoa East Medium Term (2027-2034).</i> b) The Public Transport Item has a new item; <i>Te Tumu Collector Roads in the 2027-2034 period.</i> c) The Road Network Item has a new item; <i>Te Tumu Collector Roads in the 2027-2034 period.</i> d) The Road Network Item has a new item; <i>Te Tumu Structure Plan Projects in the 2027-2034 period.</i> e) The Wastewater Item has a new item; <i>Te Tumu Structure Plan Projects in the 2027-2034 period.</i> f) The Water Supply Item has a new item; <i>Te Tumu Structure Plan Projects in the 2027-2034 period.</i> g) The Stormwater Item has the item; a new item; <i>Te Tumu Structure Plan Projects in the 2027-2034 period.</i> h) The Stormwater Item has the item; <i>Wairakei to Kaituna Overflow – Phase 2 moved to 2027-2034.</i> i) The Community Facilities / Social Infrastructure Item has a new item; <i>Active Reserve at Papamoa East – Te Tumu Medium Term (2027-2034).</i> 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> k) The Education Item has a new item; <i>New primary school and Kura at Papamoa East – Te Tumu Medium Term (2027-2034).</i>

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)

20th 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 20th 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
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.

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*

- *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



MAKE YOUR HEALTHY *irresistible*



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.



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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.

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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:
- 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 2050². Business NZ called for investment in energy infrastructure to achieve decarbonisation goals³.
- 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.
- 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.

¹<https://www.zespri.com/content/dam/zespri/nz/sustainability/Zespri-Climate-Change-Adaptation-Plan.pdf>

² Transpower *Whakamana | Te Mauri Hiko: Empowering Our Energy Future*: March 2020

³ Business NZ *Election Priorities for a Better Future*: June 2023 p22

⁴ Transpower *Whakamana | 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 productivity⁵.
- 5.2 Western Bay of Plenty Infrastructure Forum’s *Tauranga Moana Infrastructure Action Plan*⁶ 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 cost⁷.

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

⁵Shipping Gazette: September 9, 2023 p3

⁶[Infrastructure-Action-Plan.pdf \(priorityone.co.nz\)](#)

⁷Business NZ *ibid* p21

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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.



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- 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 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

⁸ Business NZ *ibid* p21



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October 2023

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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

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:

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Smart Growth Hearings

We wish to speak in support of our submission.

Sub No	Consultation Document Part: Area and Item	Page Ref	Submission / Comment	Decision Sought
Consultation Document:				
1	Part 1 - Objectives	17	<p>NPaTT generally supports the proposed Environmental, Cultural, Social & Economic Objectives. In particular, NPaTT supports the following objectives:</p> <p>Environmental</p> <ul style="list-style-type: none"> • Encourage sustainable development and adaptive planning. • 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"> • 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 • Recognises the linkages between the maunga (mountains), ngāhere (forests), awa (waterways), repo (wetlands), tāhuna (estuaries) and moana (harbours and ocean). <p>Cultural</p> <ul style="list-style-type: none"> • Support tāngata whenua values and aspirations, in particular papakāinga development on Māori land. <p>Social</p> <ul style="list-style-type: none"> • 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. <p>Economic</p> <ul style="list-style-type: none"> • Ensure long-lasting economic, social, environmental and cultural benefits and value for money from the agreed strategy. <p>However, NPaTT notes the following:</p> <ul style="list-style-type: none"> • The focus of the cultural well-being on papakāinga development on Maori land only is myopic and does not address other important issues. 	Adopt the Objectives as notified.

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"> • 1 – Homes for Everyone • 2 – Opportunities for Whenua Māori • 3. - Emissions Reduction through Connected Centres • 4 – Strong Economic Corridors Linking the East to the City and Port • 5 – Restore and enhance ecosystems for future generations • 6 – Change to the delivery, funding and financial model for growth. 	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"> • 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
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"> • Partnering with mana whenua to include iwi, hapū and marae aspirations in spatial planning in a purposeful and meaningful way • Enabling development of multiple owned Māori Land and Treaty Settlement Land to enhance cultural, social and economic wellbeing • Addressing housing needs, including access to affordable housing and improved liveability through good placemaking and amenities. • Achieving an integrated approach and accommodating growth within the limits set through Ngā Wai ki Mauao me Maketu which: 	Adopt the listed opportunities as notified

			<ul style="list-style-type: none"> - 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 - Recognises the linkages between the maunga (mountains), ngāhere (forests), awa (waterways), repo (wetlands), tāhuna (estuaries) and moana (harbours and ocean). • 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. 	
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

				assessment will be required
9	Part 2 – Chapter 2 - Tangata Whenua	59	NPATT generally support the Tangata Whenua Perspectives on Growth Management in tern 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"> Well-functioning urban environments have a variety of homes that enable Māori to express their cultural traditions and norms. A Future Development Strategy must include a clear statement of hapū and iwi values and aspirations for urban development. 	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"> Building homes on multiple-owned Māori land is challenging and takes a long time Housing and rental affordability is a significant issue for many Māori communities Adverse impacts of continued urban, commercial, and industrial development on Māori Land as well as sites, areas and landscapes of cultural significance. 	Adopt and acknowledge the issues listed on page 62 & 63

			<ul style="list-style-type: none"> • Cumulative and potentially irreparable impact of uncontrolled urban development on the natural environment. • Growing risk of natural hazards and climate change on marae and waahi tapu. • Recognition of commercial redress outcomes of treaty settlements. 	
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"> 1. Support and realise tāngata whenua aspirations for Māori land and papakāinga development in urban areas and in the rural environment. 2. Sites and areas of cultural significance are protected and avoided by development, and the values of those areas are enhanced. 3. Tāngata whenua are actively involved in local level spatial planning, climate change adaptation planning and implementation of the Strategy. 4. Improve access to collectively owned Māori assets in the region for benefit of iwi, hapū and whānau 	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

			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	<p>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.</p> <p>NPaTT also recognise the wider housing system issues identified on Page 112.</p>	Adopt identification of housing issues identified on Pages 111, 112, 113 as notified.
17	Part 2 – Chapter 7 - Housing	114	<p>NPaTT support the housing system growth directives as listed:</p> <p>Housing system growth directives</p> <ol style="list-style-type: none"> 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	<p>Map 18 – Future Development Strategy – Staging Map</p> <p>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.</p>	Amend the FDS map 18 to include Section 19 SO 489379, Sections 25, 26 and 27 SO 457368 as staged


			<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>	<p>growth areas either for the short term or medium term</p>
19	Part 4 – Future Development Strategy	156	<p>Map 20 – Marae Centres & 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>	<p>Adopt Map 20, with the amendment to include Section 19 SO 489379, Sections 25, 26 and 27 SO 457368 for Maori development.</p>

Property Council New Zealand

Submission on Draft SmartGrowth Strategy 2023-2073

20/10/2023

For more information and further queries, please contact

Logan Rainey


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.

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 alleviate 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

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.

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.

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.¹ 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.²
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 Management is continuing to consult with local iwi and make sure that its operations are

¹ SmartGrowth Strategy, at page 72.

² 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.³ 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

³ 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.⁴ 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.

⁴ 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

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.⁵ 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.

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

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Tauranga 3112
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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)



Contact Details

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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 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.

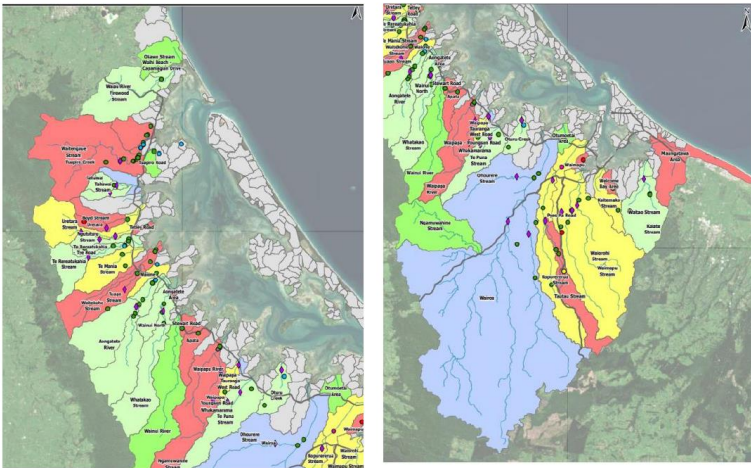
5. Water

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.

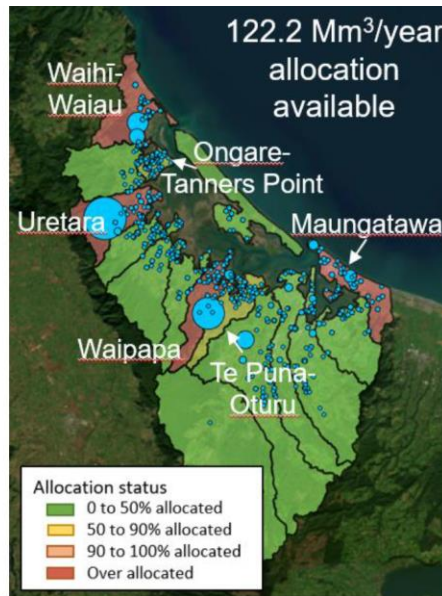
Surface water: Draft allocation status



- Over allocated
- Tuapiro
 - Boyd
 - Waitakohe
 - Kopurererua
 - Tautau

Revised draft allocation status

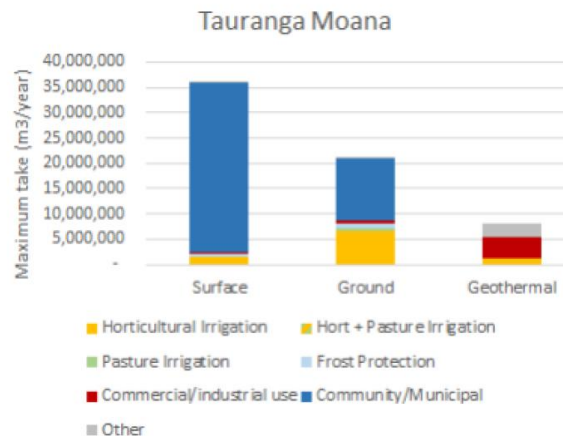
- The proposed management of the groundwater system is of a single layer (no vertical separation).
- Total allocation available for region now estimated to be 122.2 Mm³/year.
- Based on updated approach.
- Areas of over-allocation include Waihi - Waiau, Uretara-Te Rereatukahia, Waipapa, and Maungatawa.
- 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 agricultural 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.

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NZKGI

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SocialLink Western Bay of Plenty is a registered charity based at The Kollektive in 17th 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 'flating 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 Plan¹ 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*

¹ Tauranga City Council (2019) Tauranga Reserve Management Plan (2019) Reserve Specific Information

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.

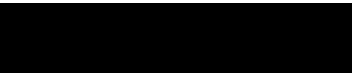
These ideas may be seen as too minor or too detailed, but the point we are trying to make is there are a range of things we feel could be encouraged as part of a 30 to 50 year plan that give optimism and hope to make our local places friendly, socially inclusive and liveable and at the same time be sustainable 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



Socialink

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 Ohauti Road, Neewood Lane and Rowe Road, Upper Ohauti 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 white background.

Carl Salmons
Director

A handwritten signature in black ink, appearing to be "RC", written over a white background.

Rosana Carnachan
Director

Attachments: Submission, Upper Ohauti Master Plan



Submission: SmartGrowth Strategy 2023 Consultation

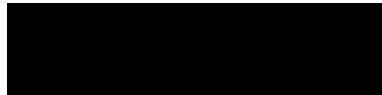
Submission by: Landplay on behalf of Upper Ohauti Landowner Group

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 Ohauti Road, Ohauti:

Address	Owner	Legal description	RT number	Area
412C Upper Ohauti Road, Ohauti	TJ and GA Hunter Limited	Lot 12 DP 463581	740123	56.368ha
432 Upper Ohauti Road, Ohauti	Maryanne Ellen Washer	Lot 2 DP 438080	540550	9.25ha
479H Upper Ohauti Road, Ohauti	Chris Ernest Thompson	Lot 10 DP 422217	736309	34.11ha
539 Upper Ohauti Road, Ohauti	Laureen Margaret Morrison, Whakataki Howard	Lot 2 DP 561622	1000190	39.35ha
539A Upper Ohauti Road, Ohauti	Morrison, Fenton McFadden Trustee Company Limited	Lot 1 DP 497322	734192	1.635ha
539B Upper Ohauti Road, Ohauti		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 Lot 5 DP 496844	732290 732289	40.607 ha 2.4ha
				Total: 43ha
81 and 112 Neewood Road, Ohauti	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 ²
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).

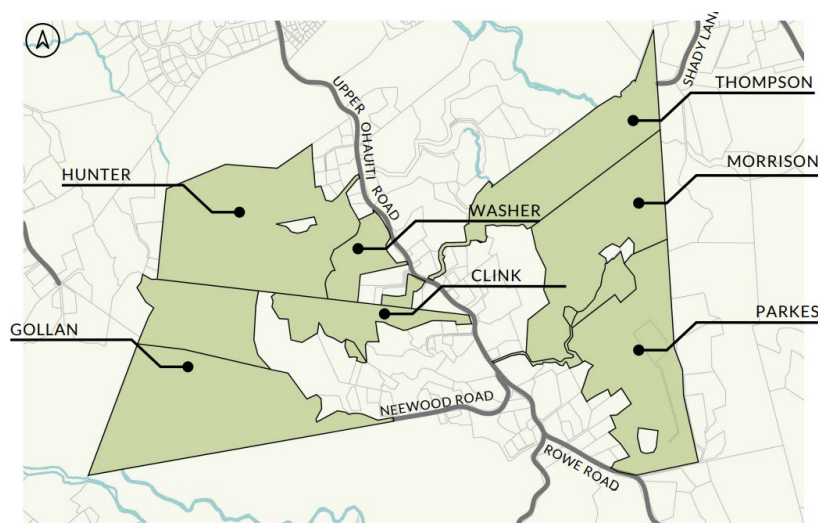


FIGURE ONE: MAP SHOWING LANDOWNER GROUP PROPERTIES

land || play

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 OHAUITI 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)¹. 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 Study² 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).

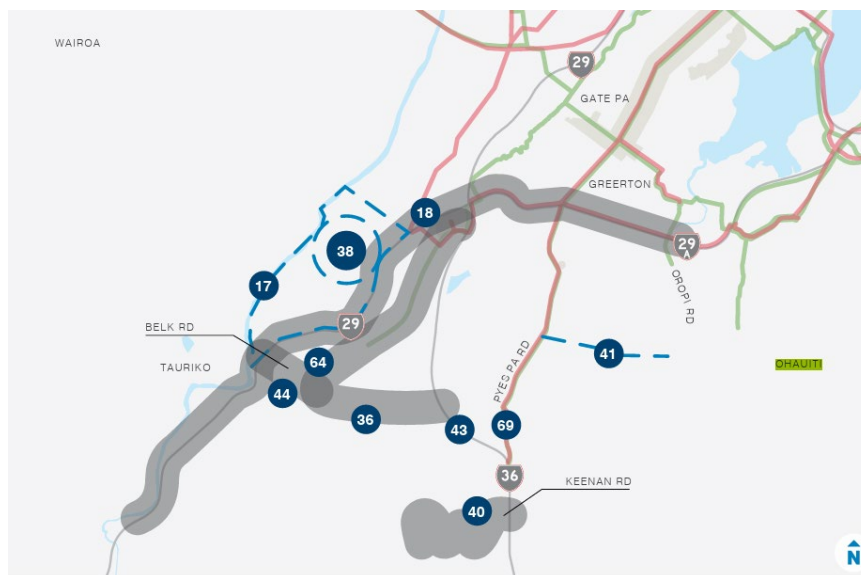


FIGURE THREE: WESTERN GROWTH PACKAGE – WESTERN RING ROUTE (NUMBER 41) (SOURCE: TRANSPORT SYSTEM PLAN 2021)

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

¹ SmartGrowth Development Trends 2021

² Welcome Bay Planning Study 2020



2018).³ 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.⁴ 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.⁵ 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.⁶ 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.⁷ 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.⁸ To achieve this, planning controls are required that acknowledge the benefits of a 'peri urban' environment.

³ Section 32 Report, Proposed Change 4 (Tauriko West Urban Limits Change 2018), Bay of Plenty Regional Council

⁴ 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>

⁵ Ibid.

⁶ Ibid.

⁷ Ibid

⁸ 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,⁹ 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 years¹⁰ 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.¹¹ 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.¹² 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.

⁹ SmartGrowth Strategy 2023, page 93

¹⁰ SmartGrowth Strategy 2023, page 94

¹¹ SmartGrowth Strategy 2023, page 143

¹² 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.

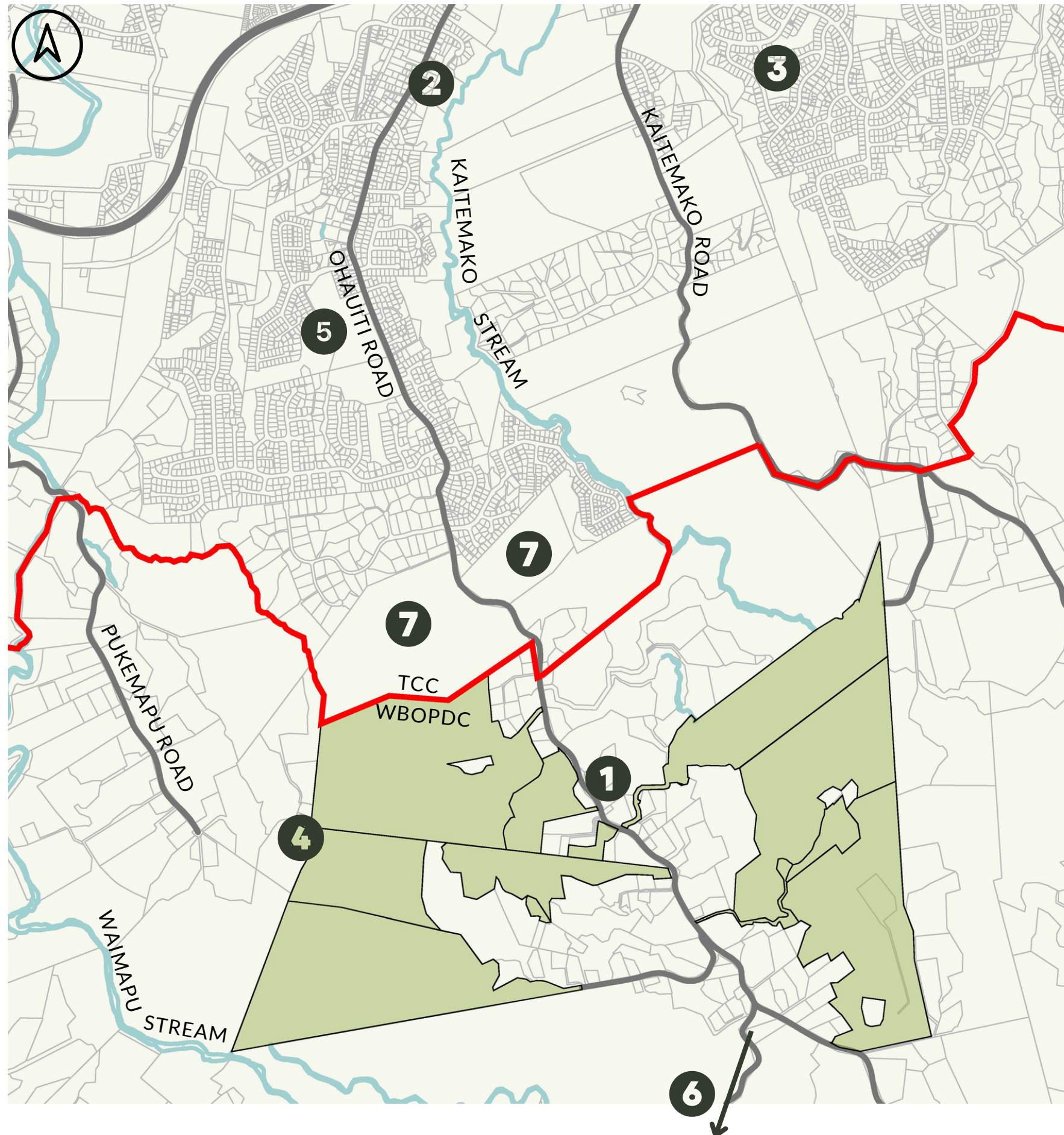
land || play

UPPER OHAUITI MASTER PLAN

This is a discussion document for consultation purposes only and subject to further development

1 | LOCATION

UPPER OHAUITI MASTERPLAN



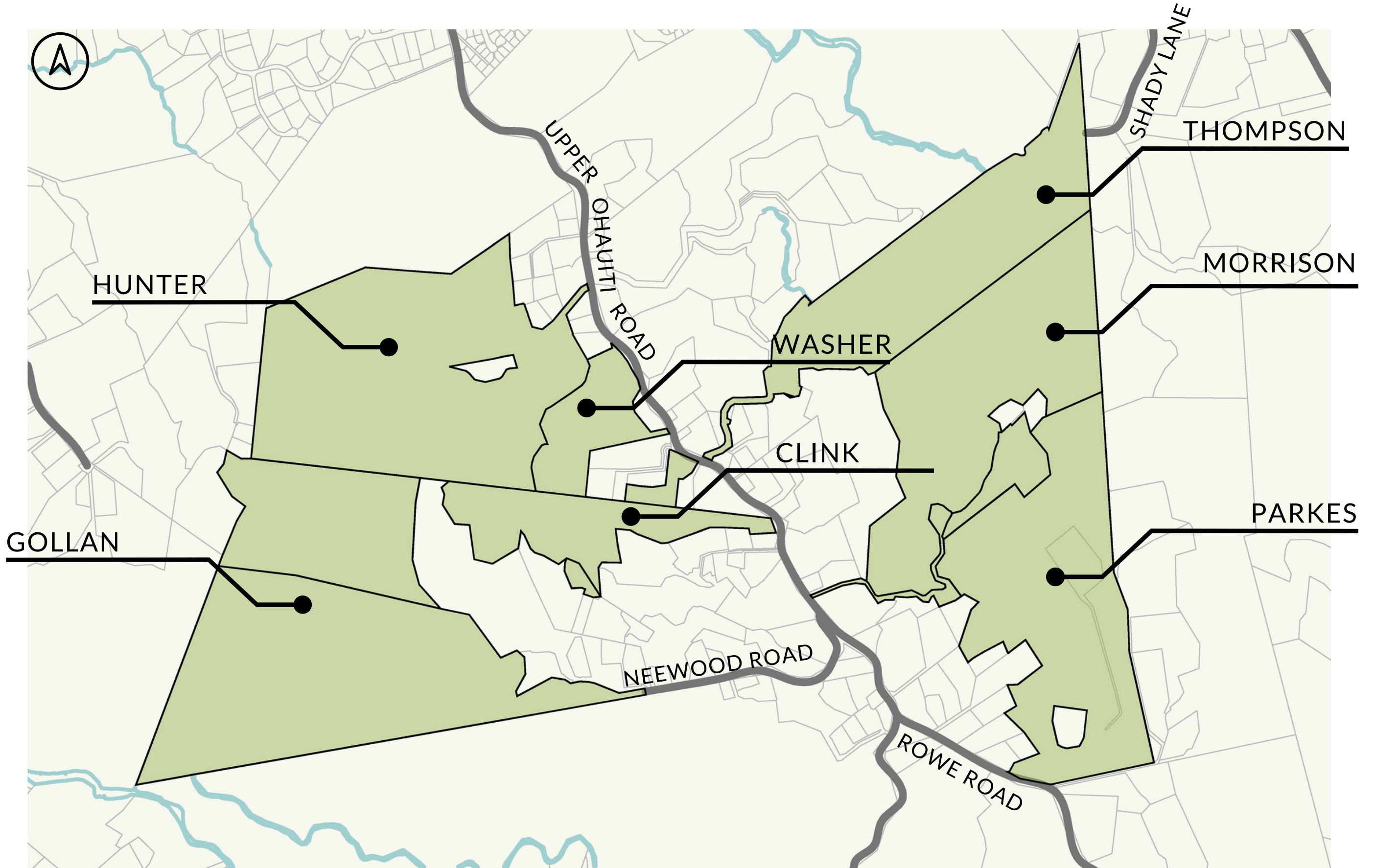
The Upper Ohaiti Master Plan Area is a response to the significant population and urban growth forecast for Tauranga and beyond. It is a unique collection of northerly facing rural landholdings with the Ohaiti Settlers Hall at its heart. The adjoining TCC Growth Area and proximity to the CBD make this 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

- ➊ OHAUITI SETTLERS HALL (0mins)
- ➋ FOURSQUARE OHAUITI (5mins)
- ➌ SELWYN RIDGE PRIMARY SCHOOL (10mins)
- ➍ PĀ SITE (NZAA ID: U14/20)
- ➎ OHAUITI RESERVE (3mins)
- ➏ OROPI PRIMARY SCHOOL (18mins)
- ➐ TCC EXISTING GROWTH AREA

2 | LANDHOLDING

UPPER OHAUITI MASTERPLAN



3 | TIMELINE

UPPER OHAUITI MASTERPLAN



Engagement with Council and Masterplanning

Meeting and further feedback from three Councils. Masterplanning and further engagement

2023

Have your Say Survey

Landowner Group submitted feedback to WBOPDC

2022

Welcome Bay Planning Study

Determined accommodating housing at suitable densities most feasible in Upper Ohauti Road area.

2020

Transport System Plan

Identified indicative plan/design for Western Corridor Ring Route via SH36 to Oropi Road/SH29A.

2021

Smartgrowth Strategy

Upper Ohauti, Pukemapu and Neewood Identified as Future Growth Area (Generation 4)

2013

BOP Regional Policy Statement

Upper Ohauti, Pukempau and Neewood identified as within Urban Limit (start post-2021)

2014

2018

Smartgrowth Future Development Strategy

Upper Ohauti, Pukemapu and Neewood reinforced as areas for investigation as Urban Growth Areas

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



RECREATION



REGENERATION



SUSTAINABILITY



CULTURAL
CONNECTION



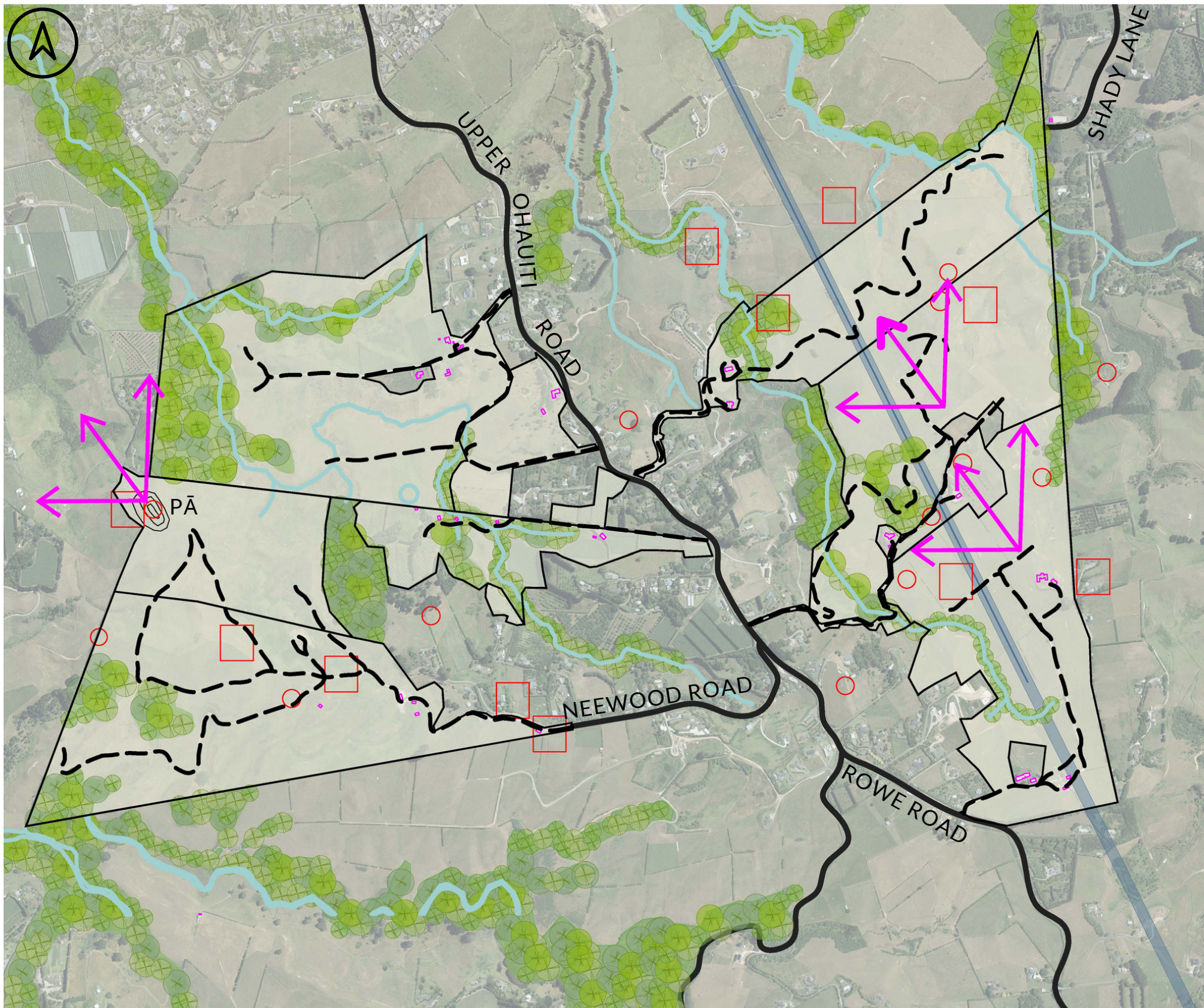
DIVERSITY



DESTINATION

6 | CONSTRAINTS & OPPORTUNITIES

UPPER OHAUITI MASTERPLAN



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 Ohaiti Road, present different constraints and opportunities. The western block has clear viewshafts to Tauranga Harbour, Mauao and the Kamai 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

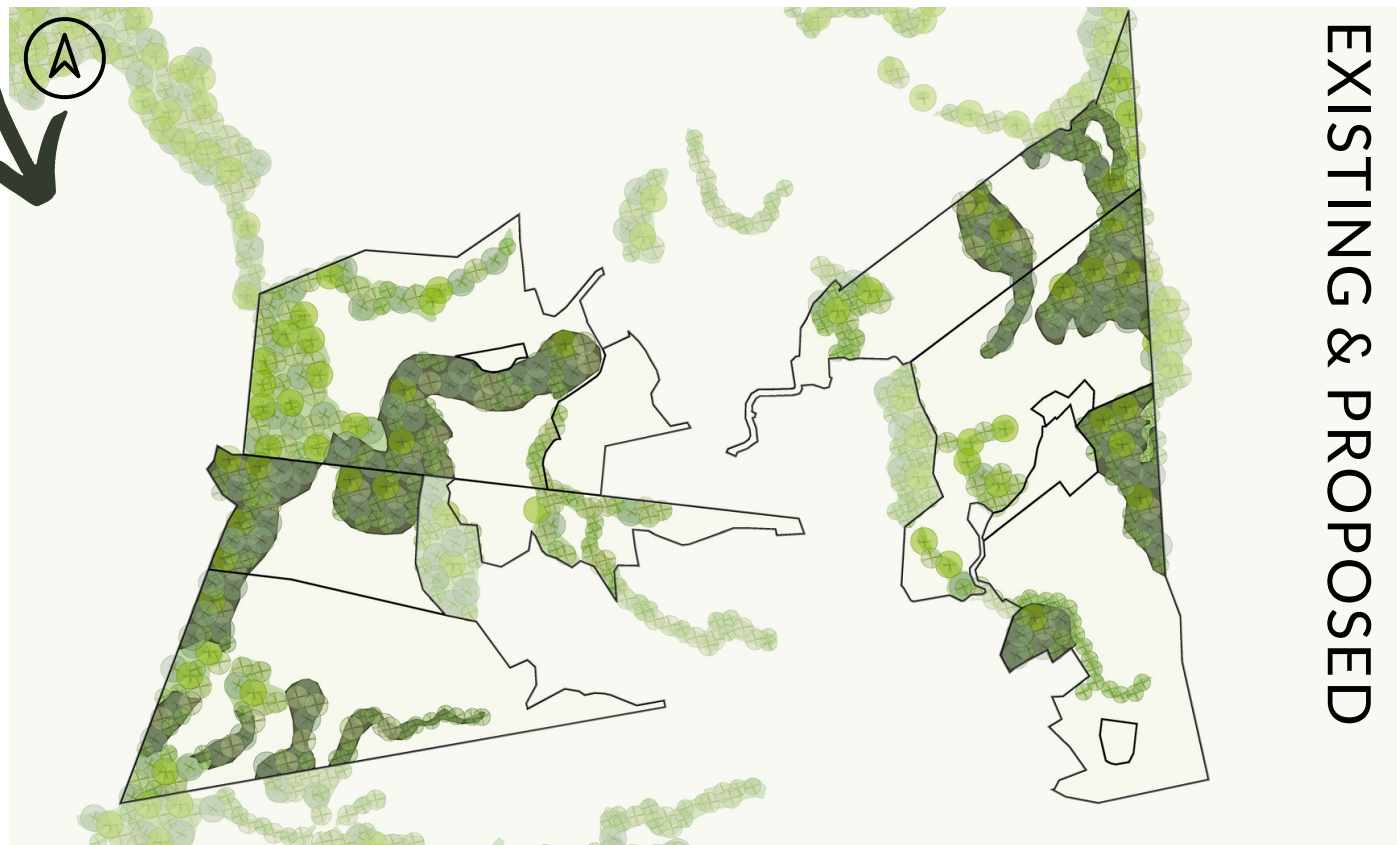


EXISTING

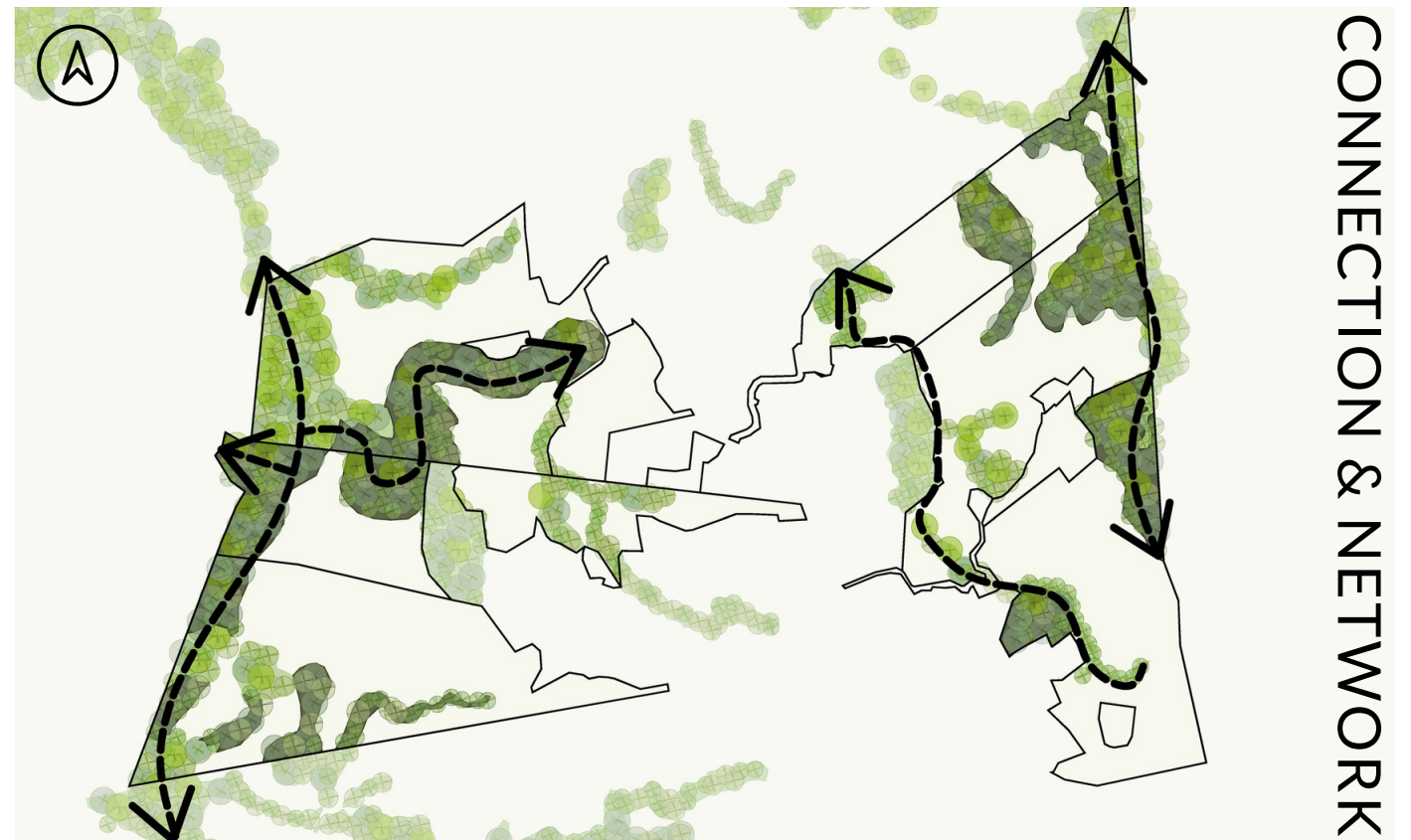
Existing vegetation patterns are characterised by rural landuse, shelter belts and pasture enclosed by steep escarpments. Some native planting has already been undertaken around the stream corridors. Further ecological enhancement and green movement will form the building blocks of this development.

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.



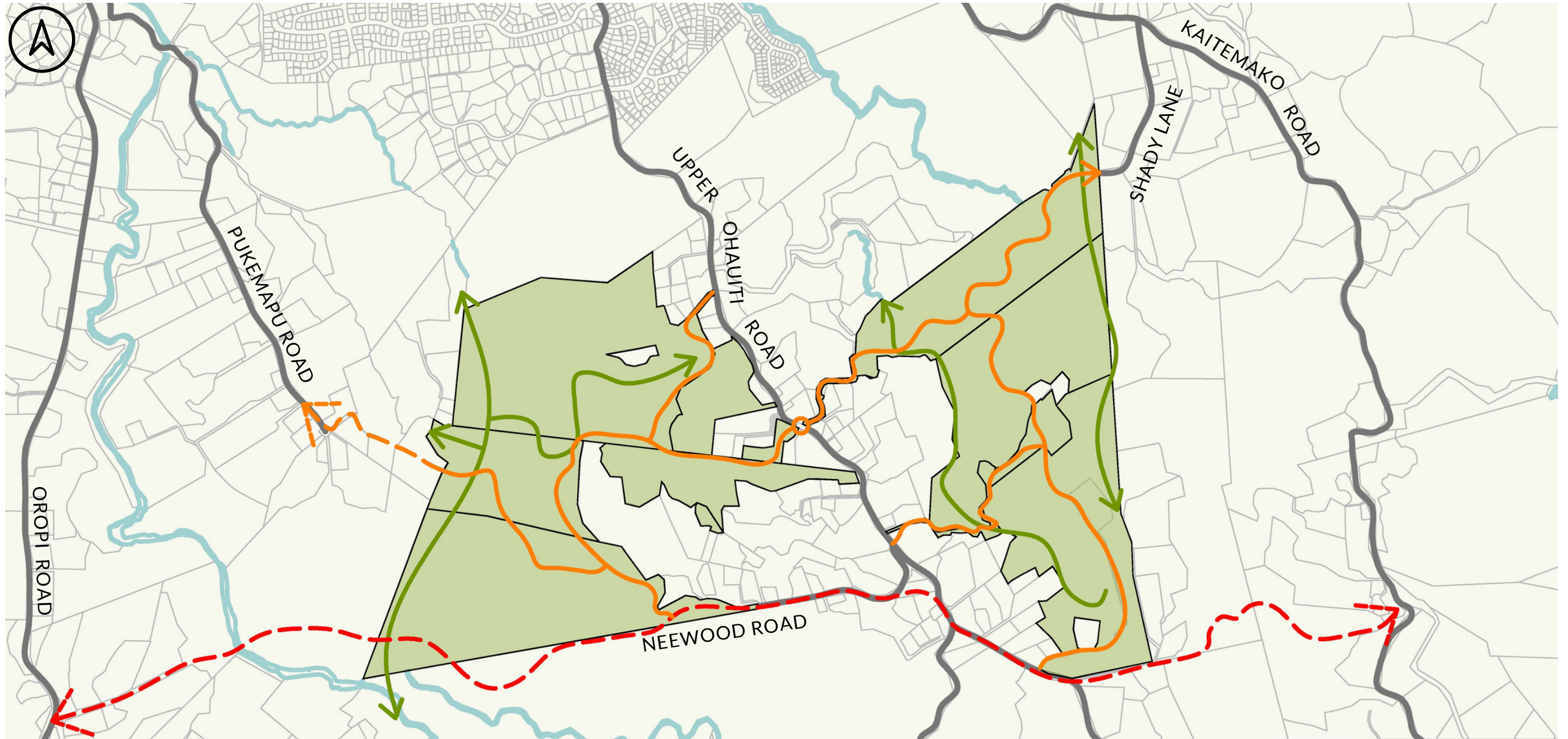
EXISTING & PROPOSED



CONNECTION & NETWORK

8 | ROAD NETWORK

UPPER OHAUITI MASTERPLAN



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.

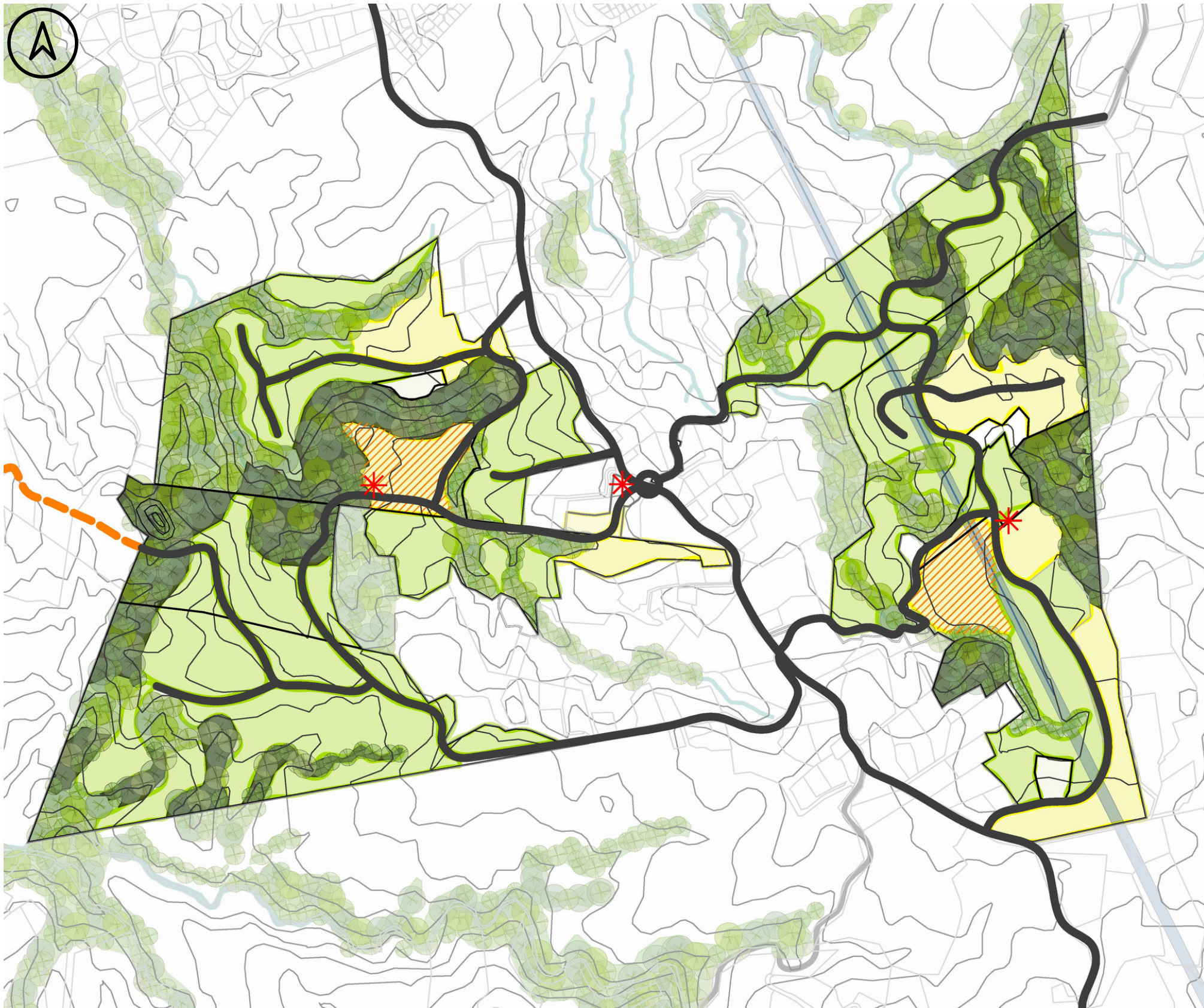
This development also provides an opportunity to incorporate a higher order east to west network linkage from Oropi Road to Kaitemako Road which would alleviate the pressure on the roading network at the State Highway 29 junctions. This linkage is indicative only and subject to further investigation.

LEGEND

- EXISTING ROADING NETWORK
- PROPOSED PRIMARY ROADING NETWORK
- PROPOSED GREEN CONNECTIONS
- - - POSSIBLE EAST - WEST CONNECTION
- - - POSSIBLE CONNECTION

7 | MASTERPLAN

UPPER OHAUITI MASTERPLAN








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.

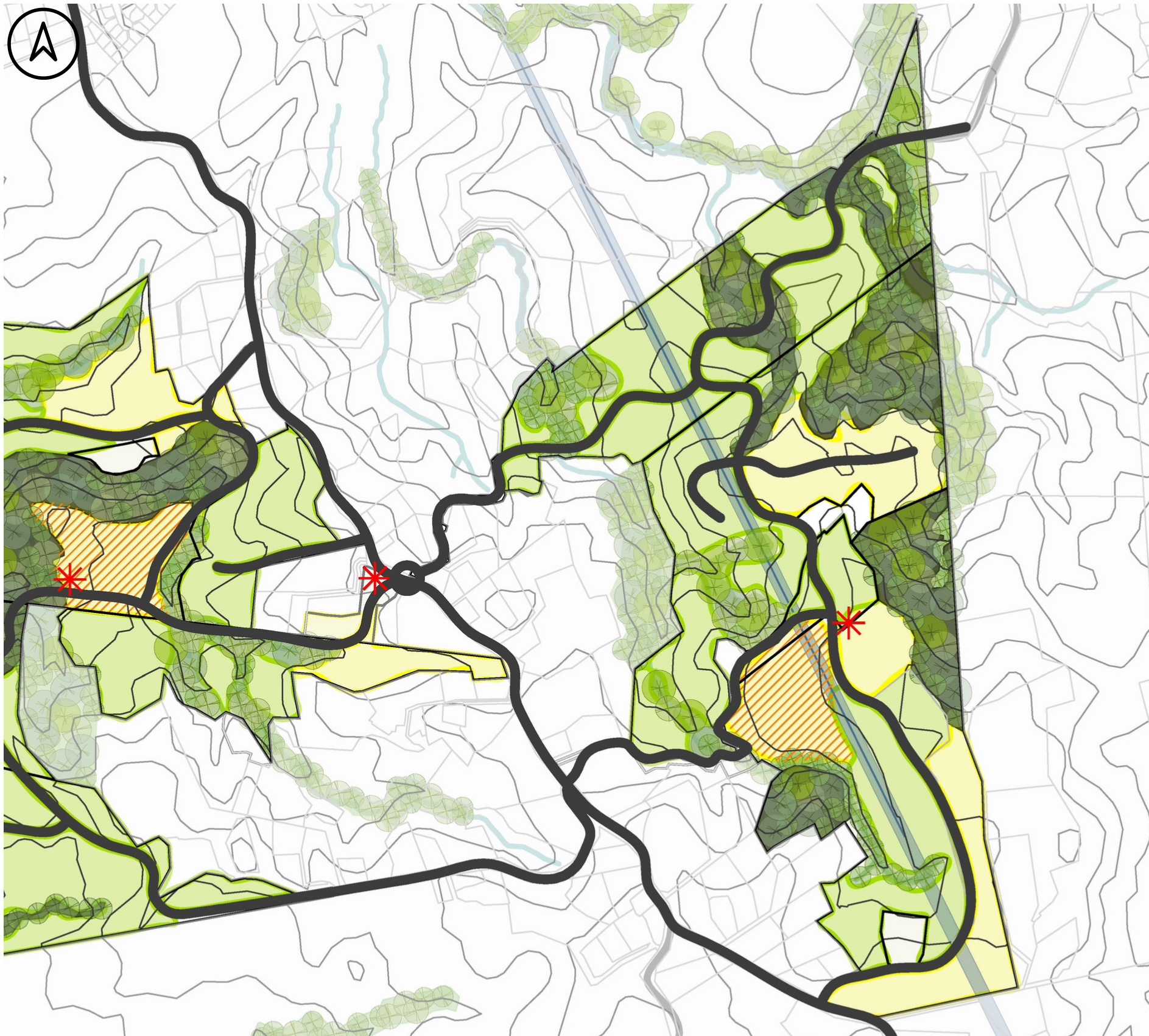
TYPE	RES A	RES B
LOT AREA	2500m ²	5000m ²
LOTS/HA	4	2

LEGEND

-  ROADING
-  RESIDENTIAL A
-  RESIDENTIAL B
-  RETIREMENT VILLAGE OVERLAY
-  COMMERCIAL ZONES/FACILITIES

8 | MASTERPLAN - EASTERN BLOCK

UPPER OHAUITI MASTERPLAN



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

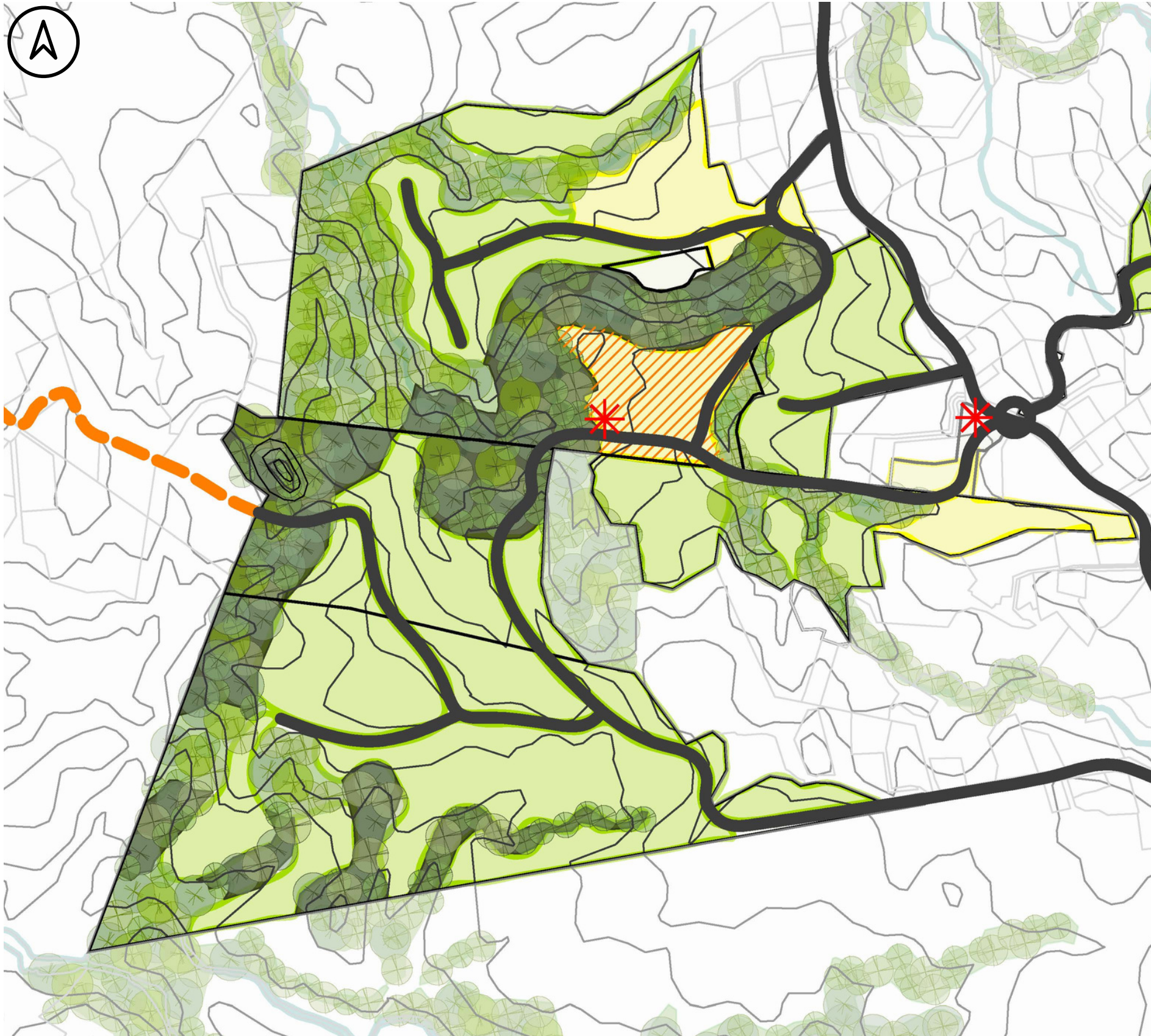
LANDUSE	AREA (HA)	# LOTS	%
RESIDENTIAL A	8.8	35	20%
RESIDENTIAL B	18.9	38	43%
OPEN SPACE AMENTY	14.3	-	32%
PRIMARY ROADING	2	-	5%
TOTAL	44	73	

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



HUNTER BLOCK			
LANDUSE	AREA (HA)	# LOTS	%
RESIDENTIAL A	23.2	93	41%
RESIDENTIAL B	11.2	22	20%
OPEN SPACE AMENITY	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 AMENITY	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 AMENITY	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 AMENITY	26.6	-	35%
PRIMARY ROADING	5.2	-	7%
TOTAL	75.1	87	

Better plan an existing lifestyle area

The area is already predominantly lifestyle. The subdivisions to date have been carried out in isolation. A structure planned area will ensure better coordination and planning for connectivity and stormwater management.

Supportive landowners

We currently have a group of aligned and supporting landowners for a zoning change. This window is limited and not guaranteed to continue medium-long term.

Housing shortfall and lifestyle options

The Tauranga area has a significant shortfall of housing. Upper Ohauti as a lifestyle area will provide more homes and housing choice without associated loading on infrastructure demands. Minden Lifestyle Area has reached capacity pending further transport network upgrades.

Ecology and recreation

Substantial ecological restoration already undertaken and further restoration will provide stormwater management benefits and recreation opportunities through the creation of a greenlane network across the area.

UPPER OHAUITI OPPORTUNITIES

Most suited for lifestyle

The topography of the collective properties creates limitations for intensive residential development while the Upper Ohauti area is situated close to the urban areas rather than as a more isolated precinct further from the city.

Soils

The land is not classified as highly productive land (for NPS-HPL purposes) and will not reduce capacity for land-based primary production. The farms are small and marginally economic.

Servicing

The properties can be essentially self-servicing for water supply, wastewater and stormwater.

Roading upgrades

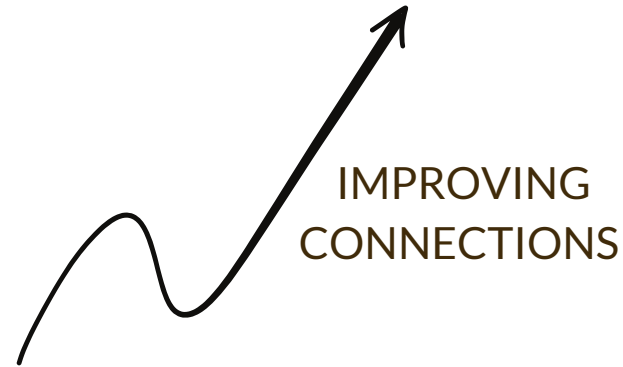
Upper Ohauti Road has not been upgraded to account for the increase in traffic to service the lifestyle properties. All existing and future landowners stand to benefit from upgrades to the road. Development of the Upper Ohauti area within the Tauranga City Council boundary will result in upstream upgrades.

11 | SUMMARY

UPPER OHAUITI MASTERPLAN

RESIDENTIAL A
211 lots*
2500m2 AVERAGE

SUITABLE FOR
POSSIBLE FURTHER
INTENSIFICATION



SYMPATHETIC WITH
THE NATURAL
LANDSCAPE
KEEPING
EARTHWORKS AND
DEVELOPMENT COSTS
LOW



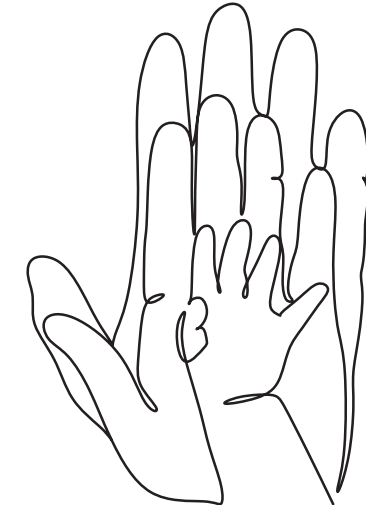
RESIDENTIAL B
236 lots
5000m2 AVERAGE

OPEN SPACE
AMENITY
88ha
(32%)

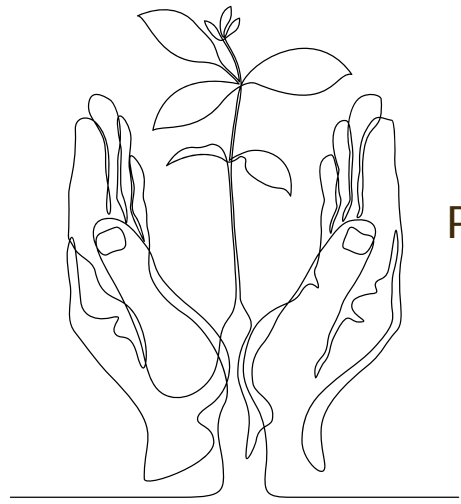


PROMOTING
COMMUNITY
SPACES

TOTAL AREA
278ha



GROWING UP &
GROWING OLD
IN
NATURE



PROTECTING THE
ENVIRONMENT

12 | LOOK & FEEL IMAGERY - RURAL RESIDENTIAL

UPPER OHAUITI MASTERPLAN



13 | LOOK & FEEL IMAGERY - COMMUNITY HUB

UPPER OHAUITI MASTERPLAN



14 | LOOK & FEEL IMAGERY - SIMILAR DEVELOPMENTS

UPPER OHAUITI MASTERPLAN



THANK YOU!



Rose Carnachan

Carl Salmons

www.landplay.co.nz



Rosa Charteris

www.maven.co.nz

mailto:admin@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: (2006⁷)

(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.

FROM PAUL HICKSON -paul@paulhickson.com

DATE 20 OCTOBER 2023

THE 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 Rangioru 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 MATTERS

Environment

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

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)

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**URBAN
TASK FORCE
TAURANGA**

**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:

A handwritten signature in black ink, which appears to read "Craig Batchelar". The signature is written in a cursive style with a long horizontal stroke at the end.

Craig Batchelar

SmartGrowth Strategic Advisor

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 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 Waka Kotahi – the New Zealand Transport Agency)
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.

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 indigenous biodiversity 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"> • TCC Nature and Biodiversity Action & Investment Plan • Plan, Climate Change Action & Investment Plan Biodiversity funding programmes • Biodiversity funding programmes
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"> • Structure plans - Omokoroa; Tauriko West Local spatial plan actions – Te Papa, Otumoetai, Mount Maunganui

		<ul style="list-style-type: none"> • <u>Local spatial plan actions - Te Papa, Otumoetai, Mount to Arataki</u>
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.

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>

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.

**COLLIER CONSULTANTS LTD**

PO Box 14371
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TAURANGA 3143

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



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.



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:



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.



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 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.

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.

¹ Page 104 of the SmartGrowth Strategy



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.”²

No further business land has been specifically identified in the draft Strategy for the Eastern/Central corridors. Te Tumu and Ranguiuuru are already identified in “existing allocations” These areas are excluded from the further 300-400ha required.³

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

² Page 149 of the SmartGrowth Strategy

³ Page 148 of the SmartGrowth Strategy



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.⁴

The Aurecon report also noted for the Central Corridor (Domain Rd 1 and 2, Tara Rd 1 and 2, and Ottawa:⁵

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.

⁴ Page 51 SmartGrowth Industrial Land Study, Aurecon 2023

⁵ Page 51 SmartGrowth Industrial Land Study, Aurecon 2023



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"> • Relatively low (net) fill requirements. • Good Geotechnical and ground conditions. • Low land cost. • The site can be developed at scale. • Initial flood modelling concludes the area can be developed as there is sufficient land to provide for attenuation. • Natural hazards can be appropriately mitigated through landform
Environmental	Considerations and consenting	<ul style="list-style-type: none"> • Current rural zoning / activity. • Limited productivity or economic output. • The land does not contain High value productive soils. • There are no wetland or ecological features.



KEY AREAS	SPECIFIC CRITERIA ELEMENTS	FURTHER COMMENTS
		<ul style="list-style-type: none"> Stormwater management areas provide significant ecological benefits.
Infrastructure	Servicing and proximity to transport	<ul style="list-style-type: none"> Immediate access to State Highway and local road network via the Planned Papamoa East interchange. Good water and wastewater connection options including a servicing corridor under the TEL.
Fit	Strategic & market	<ul style="list-style-type: none"> Superior location with immediate access to large population which builds on and is an extension to the Wairakei urban area. The development aligns with the “connected Centres” approach (including a connection to Te Puke and the existing Wairakei Centres). There is a strong relationship with and alignment with The Sands sub-regional centre, which is under development. The land is controlled by a single ownership entity. 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.
Te Ao Maori	Mana/Tangata Whenua	<ul style="list-style-type: none"> No Marae are impacted. No sites of cultural significance are identified on the land

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).



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

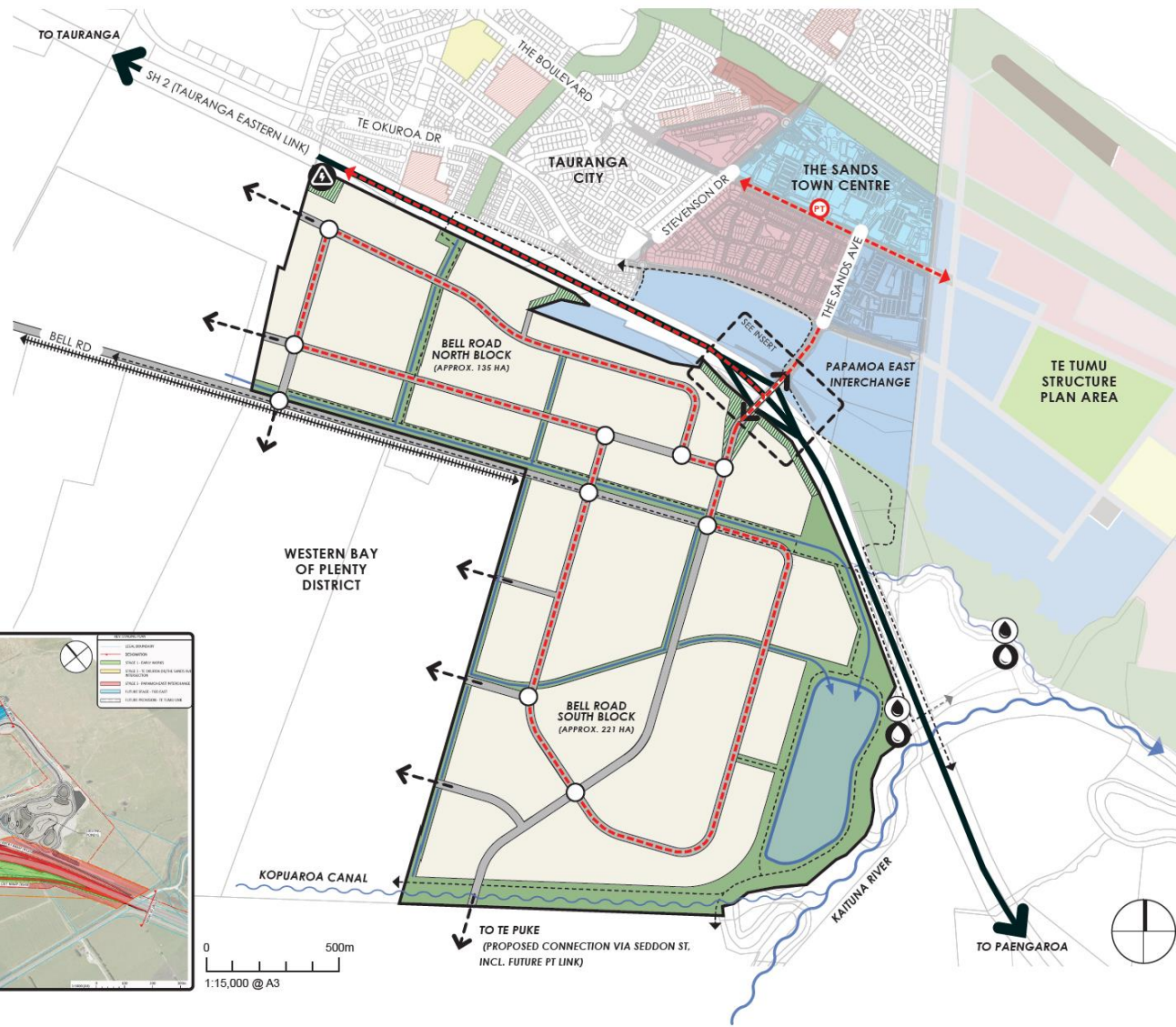
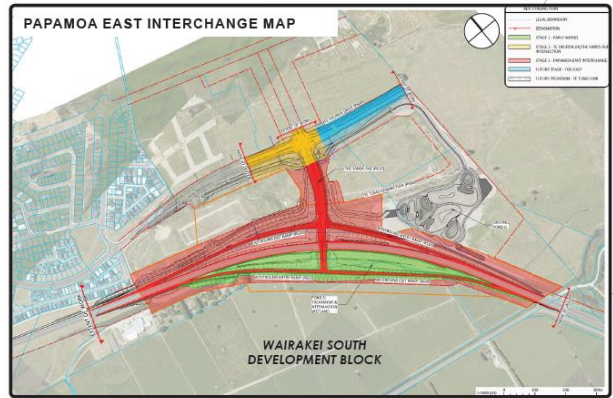
Appendix (i) – Wairakei South Urban Growth Area

LEGEND

- DEVELOPMENT BOUNDARY
- STATE HIGHWAY 2 (TAURANGA EASTERN LINK)
- INTERCHANGE (PRIMARY SITE ACCESS - MULTI-MODAL)
- PRIMARY INTERNAL ROAD NETWORK
- KEY INTERNAL INTERSECTIONS
- PUBLIC TRANSPORT ROUTE (INCL. CYCLEWAYS)
- FUTURE ROAD NETWORK EXTENSION
- POTENTIAL RAIL BRANCH LINE
- PRIMARY WALKWAY/CYCLEWAY CONNECTIONS
- CONVEYANCE SWALE NETWORK (INCLUDES WALKWAY/CYCLEWAY LINKAGES)
- EXISTING STREAM / RIVER NETWORK
- STORMWATER RETENTION POND / TREATMENT WETLAND
- MIXED USE DEVELOPMENT AREA
- STATE HIGHWAY BUFFER RESERVE
- STORMWATER RESERVE (INCL. WALKWAY / CYCLEWAY)
- POWER SUBSTATION
- PUMP STATION
- PROPOSED ADDITIONAL PUMP STATION

Total Development Area: 356 Hectares

- Bell Road North Block: 135 Hectares
- Bell Road South Block: 221 Hectares



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

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 report¹ 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 2021² (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.

¹ Statement of Evidence of Lawrence Ryan McIlrath – para 3.8 (part of Sec 42a Report)

² <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 m² 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 m² gross floor area of bulky goods and large format retail stores, and a 3,900 m² 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 2043.¹ The Strategy anticipates² 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,³ 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.*

¹ Statement of evidence of Tim Heath (Economics) on behalf of the Tauranga City Council (dated 24 August 2023) at [4.5].

² Pg 136; SmartGrowth Strategy Draft for Consultation 2023.

³ 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”⁴ 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.

⁴ Pg. 133; SmartGrowth Strategy Draft for Consultation 2023

Dated 20 October 2023

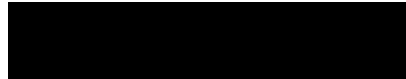
Signature by its planning and resource
management consultants and
authorised agents Bentley & Co. Ltd.



Mark Arbuthnot

Address for Service: Tauranga Crossing Limited
Bentley & Co. Ltd
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NGĀI TUKAIRANGI HAPU SUBMISSION TO THE SMARTGROWTH STRATEGY 2023-2073



Submission on: 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
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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 Rangī 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, Waikareī 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 today¹, 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

¹ This is directly as a result of the impact of colonisation and the raupatu that impacted our tribal footprint.

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.

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

	Ngāi Tukairangi Hapū Response:	How the SmartGrowth Strategy can be improved:
01. Areas to be protected and developed carefully	1A. Māori communities 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.	1A(1). 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.
03. Climate resilience	3A. 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.	
	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

	<p>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.</p>	<p>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 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.</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 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</p>	<p>3D(1). 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.</p>

	subject to erosion with the dissipation of sand on the shoreline.	
	<p>3E. Hapū driven initiative: 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>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 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>
05. Rural	<p>5C. Matapihi rural status: 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>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.</p>

	<p>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>	
	<p>5A. The significance of Marae centres: 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>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.</p>

	<p>5B. Māori health clinic: 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>5B(1). 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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<p>08. Transport</p>	<p>8A. Promoting sustainable transportation: 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.</p>	
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	<p>8B. Traffic/road improvement projects: 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 hapū and the Matapihi community, seeking our input and feedback to ensure that any roading developments align with our community's requirements.</p>
	<p>8C. Matapihi shared pathway: 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>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</p>

	<p>work. However, the question arises: is the existing shared pathway adequate to accommodate the volume of traffic it sustains?</p>	<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>
<p>09. Three waters and other infrastructure</p>	<p>9A. Power grid infrastructure: 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>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.</p>

	infrastructural support in the form of an upgraded power grid to cater to the anticipated growth?	
	<p>9B. Water systems and infrastructure: 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.</p>	<p>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 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.</p>
Part 5. Partnership and collaboration	<p>5A. 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.</p>	Continue to ensure Ngāi Tukairangi hapū are partnered in discussions about any developments within our rohe.
Funding	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

	<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

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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.

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

COLLIER CONSULTANTS LTD

PO Box 14371
Tauranga Mail Centre
TAURANGA 3143

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.

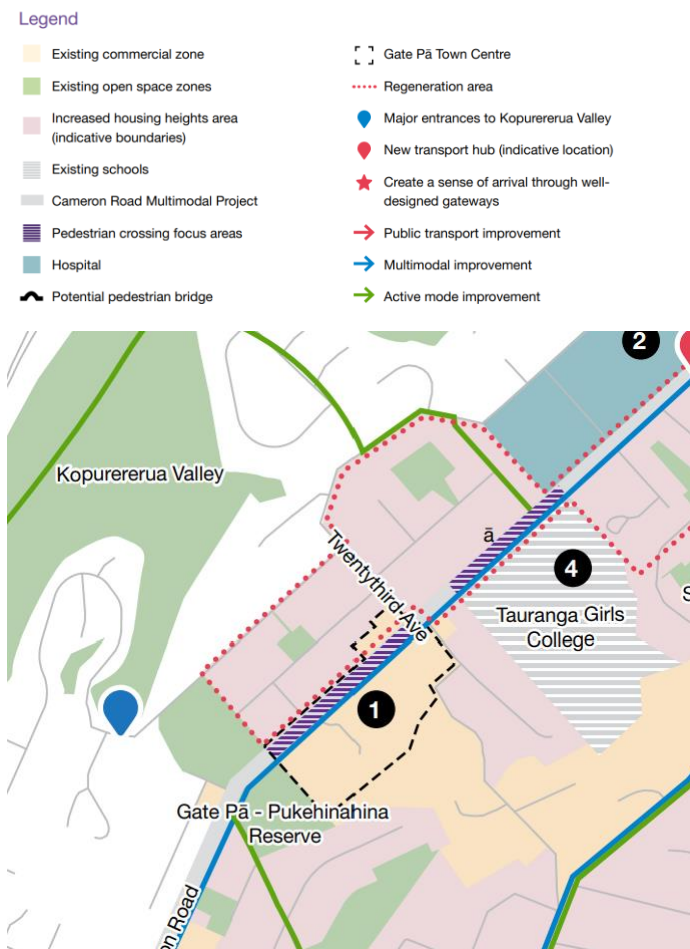
Gate Pa Town Centre and the Te Papa Spatial Plan

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 plan¹ for Te Papa, and is identified as a Town Centre in the Spatial Plan.

¹ 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 Centre². 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 options³.

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 Road⁴. 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:



² See page 44 of the Te Papa Spatial Plan.

³ See pages 45-47 of the Te Papa Spatial Plan.

⁴ 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

Rebecca Eng



20 October 2023

SmartGrowth Strategy 2023 Consultation
SmartGrowth
306 Cameron Road
Tauranga

By email c/- 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”¹ 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 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.

¹ “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.

Yours faithfully
TRANSPower NZ LTD

A handwritten signature in blue ink, appearing to read 'R. Eng', with a small flourish at the end.

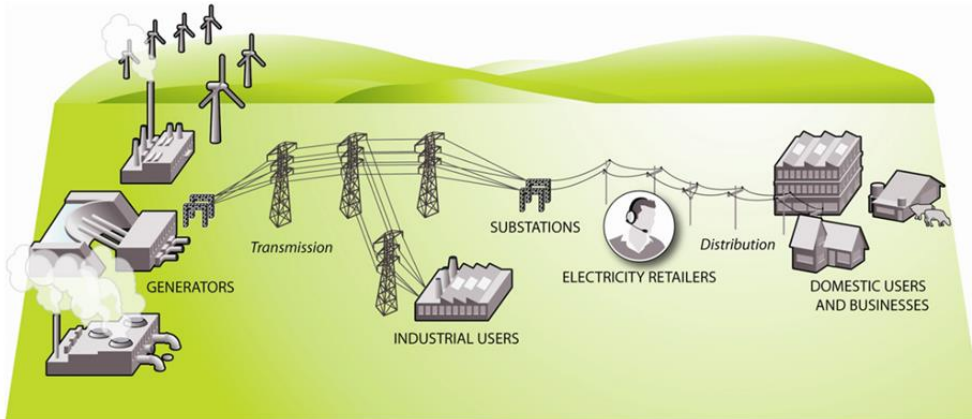
Rebecca Eng
Technical Lead – Policy

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

National Grid Assets in the Western Bay of Plenty (highlighted yellow)





20 October 2023

SmartGrowth

Attention: [Andrew Turner \(Independent Chair\)](#)

Via Email: 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.

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 232,050m² (including 386 units of visitor accommodation), and 1,287 residential units.

Table 1: The Sands CDC Areas

Area Type	Town Centre Area m ²	MIBA Area m ²	Total Areas
Retail			
General Retail/Cinema/Food and Beverage	62,670	4,550	67,220
Home Improvement and Showrooms		34,130	34,130
Total Retail Areas	62,670	38,680	101,350
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
Total Commercial Areas	96,770	33,930	130,700
Total Areas	159,440	72,610	232,050

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.

-
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,



Bryan Perring
Development Director
Kaitiaki Property

Submission Form

Post: SmartGrowth Strategy 2023 - 2073 Administration		or Email: administration@smartgrowthbop.org.nz haveyoursay@westernbay.govt.nz
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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.

20th October 2023

Contact person: Bryan Perring

Telephone: [REDACTED]

Email: [REDACTED]

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
<p>Urban Form and Centres Page 102 Paragraph 4</p>	<p>Support in Part with updates as per the Decision Sought column.</p> <p>Oppose in Part as per strikeout deletions marked.</p>	<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 in a hierarchy¹ of being the:</p> <ul style="list-style-type: none"> • City Centre (Tauranga CBD) • <u>Metropolitan Centre (Wairakei – The Sands)</u> • Town Centres (existing – town centres that are there now and proposed – new town centres that have been planned but development hasn't yet commenced) • Potential Town Centres (locations that may turn into full town centres in the future). <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>¹The <u>connected</u> centres hierarchy approach has can be been 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 (UFTI) or in the National Planning Standards (NPS).</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>

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 <i>“it is intended to be predominantly for a broad range of commercial, community, recreational, and residential activities”</i> and is <i>“focal point for sub-regional urban catchments.”</i></p>

Centre Type	Location	Description	
Regional and City Centre	Tauranga Central Business District	<p>Provides for a broad range of commercial, community, recreational and residential activities, intended to service the needs of the region.</p> <p>Building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification.</p>	
Metropolitan Centre	Wairakei - The Sands	<p>Provides for broad range of commercial, community, recreational and residential activities, intended to service the subregion.</p> <p>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.</p>	<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>
Town Centres	<ul style="list-style-type: none"> • Waihī Beach • Katikati • Ōmokoroa • Bethlehem • Fraser Cove • Greerton • Cameron Road Centre • Tauranga Crossing • Mt Maunganui • Bayfair • Pāpāmoa • Wairakei - The Sands • Te Puke 	<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>	
Potential Town Centres	Brookfield	These areas will become town centres over time.	

		<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, 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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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

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.

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.

- 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.**

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.

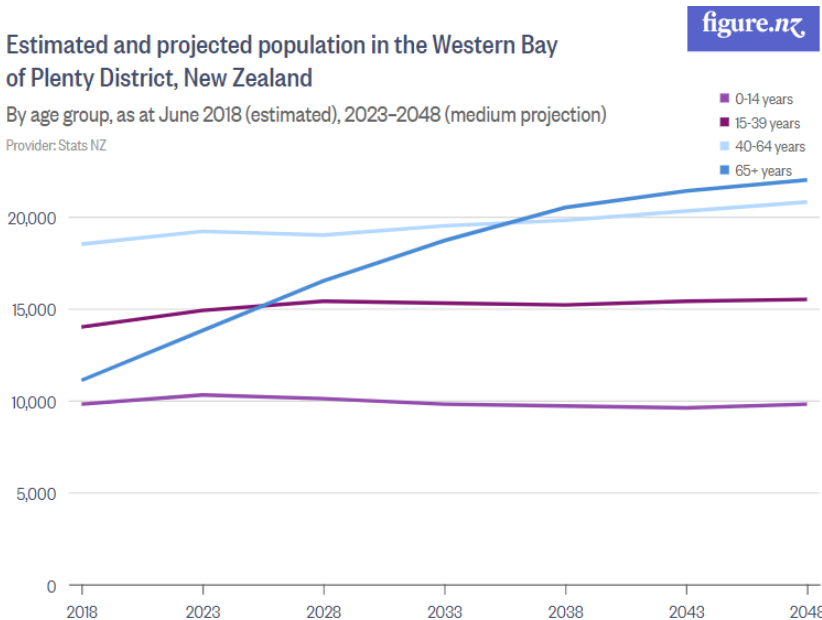
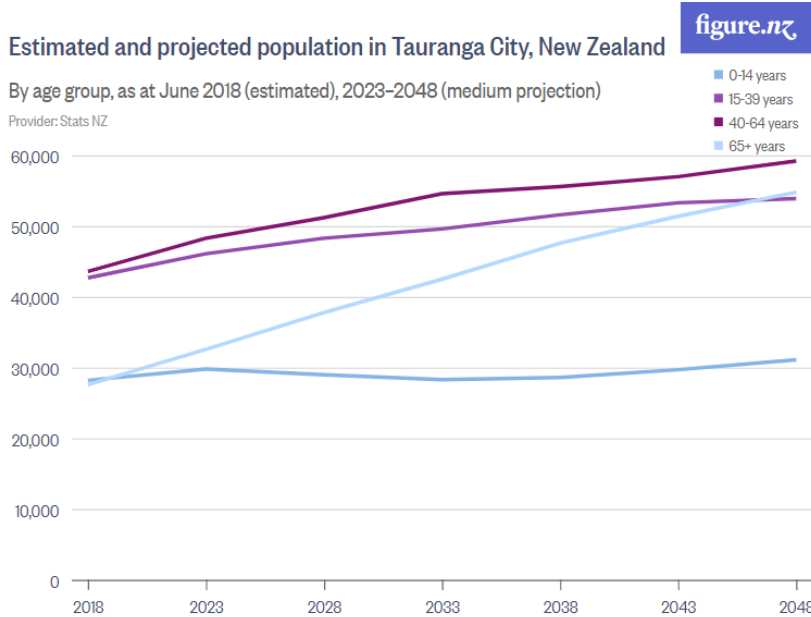
This is a key issue. The overall long-term cost of intensification v greenfield developments needs to be fully understood by councils and by local communities, in order to make informed, sustainable decisions.

Strategic Demographic Issues

We are not convinced the Draft Strategy has fully and adequately considered three vitally important strategic issues:

- 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.

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.

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’.

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?

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.

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 20th 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

18th 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 .