

Smartgrowth Strategy 2023 - Summary of Submissions

Topic	Issue	Sub ID	Sub Point	Name	Summary	
SGS23-01: Areas to be protected and developed carefully	1: Areas to be protected and developed carefully	17	5	Pirere, Tania	The whole takiwha of maketu. Maketu is the one of the very few little towns when you drive there especially for the time is like back in the 70s and 80s the whole ahautangata being back of the days of our nannys and koros	
		27	5	N/A, Richard	Room for wetlands and water. Auckland made all the mistakes we need to learn from. Make tauranga a sponge city with room for rivers and wetlands to take sediment. Houses should be built with a view to 100 years, not the next cyclone. Corridors of vegetation linked together can provide a lager area for native animals.	
		59	4	Ministry Of Education	5.1 Chapter 1 Areas to be protected and developed carefully The Ministry supports the approach of ensuring that development is directed away from areas where there are critical constraints to development or intrinsic environmental and cultural attributes that must be protected from future land development. The precautionary approach to growth in areas with natural hazard susceptibility and other land constraints is also supported.	
		72	7	Nga Potiki a Tamapahore Trust	NPaTT support the land not being identified as a "no go area" on Map 1. Adopt Map 1 as notified in relation to land located to the south of Tara Road, Papamoa legally described as Section 19 SO 489379, Sections 25, 26 and 27 SO 457368.	
		72	8	Nga Potiki a Tamapahore Trust	NPaTT acknowledge that there are some constraints on the subject site and acknowledge its inclusion as a "go carefully" and flood identification layers with respect to natural hazards. Adopt Map 2 & 2a as notified in relation to land located to the south of Tara Road, Papamoa legally described as Section 19 SO 489379, Sections 25, 26 and 27 SO 457368.	
		72	9	Nga Potiki a Tamapahore Trust	Map 2B appears to show the subject land as LUC 2, which is identified as Highly Productive Land under the National Policy Statement for Highly Productive Land. It is acknowledged that whilst the land is mapped as Class 2, this will require site specific investigation and NPaTT acknowledge the go carefully approach here. Adopt Map 2b as notified in relation to land located to the south of Tara Road, Papamoa legally described as Section 19 SO 489379, Sections 25, 26 and 27 SO 457368, with caution that site specific land use capability assessment will be required.	
	2: Support		30	2	Wallen, Bruce	Sea level rise with subsequent inundation of Papamoa and the Mount are likely in the future either from rising groundwater tables levels or flooding by runoff to low lying areas, and possibly tsunami. Make a clear stand NOW and state new building restrictions (setback) for coastal areas that restrict use of low lying or flat land. This will be unpopular but will direct development thinking, so rather a hard decision made now than wait and have to deal with issues such as buyouts of flooded houses, aka Auckland, Hawkes Bay.
			46	1	Sadler, Jon	There seems a fundamental assumption amongst policy makers and planners in Tauranga that the large majority of people want growth. They don't. Growth in Tauranga certainly doesn't mean per capita increase in wealth and well-being. Resilient and sustainable places require green corridors and belts, and a focus on environmental and sustainable resource design and build, with pre-planned associated roads and infrastructure.
			47	7	Fitter, Julian Richmond	"This phrase does not make sense. If an area is to be protected, it should not be developed at all! Any development needs to be done carefully, the alternative is unthinkable - I hope."
			53	14	Bowden, Beth Willard	The maps make the clear point that, despite the acknowledged desirability of the Bay of Plenty as a place to live, that all of the 'easy land' is already in use. In other words, geography has already imposed a limit to growth. The so-called "Growth directives" on page 51 therefore seem mis-titled.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		54	1	Robson, John	No
		74	3	Waste Management Nz Ltd	General growth directives that seek to avoid development in areas that are at risk from natural hazard risks, where possible. Waste Management's submission is focused on its concerns to ensure that a blunt, blanket approach to development in areas at risk of natural hazards is not created through the SmartGrowth Strategy, particularly where the risk of natural hazards on development can be adequately and appropriately mitigated.
		74	5	Waste Management Nz Ltd	While Waste Management is generally supportive of the approach to avoid areas at high natural hazard risk, Waste Management is also conscious that there are a range of existing incentives on landowners and infrastructure providers to ensure that any future development occurs in a way that appropriately manages those natural hazard risks. Council's approach to blacklisting areas that could potentially be developed, subject to appropriate natural hazard mitigation, is overly blunt, especially when an appropriate engineering solution could be put in place that appropriately manages the risk. Given the shortfall of existing industrial zoned land within the sub-region, Waste Management considers a pragmatic approach is necessary in this regard. In developing an approach to managing development and land use in areas subject to natural hazards, the SmartGrowth Partnership must consider other incentives on landowners and infrastructure providers to provide for high quality developments that address, manage and mitigate hazards (for example, recognising the greater stringency of building standards with regard to obtaining building consent or insurance). Waste Management considers that it is critical that the SmartGrowth Strategy does not unnecessarily constrain development and land use of its sites, particularly where other alternatives are available to manage those natural hazard risks.

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SGS23-02: Tangata whenua	1: Partnership	5	2	Goodley, Wayne	Listen to our Tanga when ya.
		7	2	Angela	Ensure the mana whenua voice is central
		29	1	Cole, Julie Margaret	You have no right to come into our country and tell us how to live. Best you back out and leave as quietly as you snuck in.
		53	19	Bowden, Beth Willard	I defer to local iwi's rights and responsibilities to determine their own attitudes to this Strategy. <ul style="list-style-type: none"> • I endorse Pirirakau's submission, particularly at paragraphs 13, 14 15 and 24 • I draw your attention to my previous remarks concerning tangata whenua's involvement in planning assumptions made about Maori land use and availability for development
		69	1	Pirirakau Tribal Authority - Incorporated	7. The development of the SmartGrowth Strategy relies on tangata whenua representative groups to inform the work of Smartgrowth relying on 1-2 representatives. 8. The SmartGrowth Strategy information available for the past 12 months details presentations and Combined Tangata Whenua Forums meeting agendas where this details the absence of Pirirakau participation. 9. 'Others' continue to make decisions with very little engagement of consultation. Tangata whenua collectively are not resourced to engage at the required level other than meeting fees of tangata whenua resourcing. 10. The tangata whenua representatives are presented with information not consulted minutes prove the low level of opportunity to engage as well informed or appropriately.
		69	7	Pirirakau Tribal Authority - Incorporated	25. Tangata Whenua engagement is not acceptable in its current form as a tick box undertaking. As outlined the Tangata Whenua representatives within the forums are presented with information that is not shared or discussed widely with their people and Councils know this. 26. As the SmartGrowth Strategy is an official proposal requiring procedural outcomes involving further submissions. Th Smartgrowth Strategy while having some positive outcomes is OPPOSED until a working group is formed and meetings are held with wider Pirirakau hapu and local community is OPPOSED. Please enable the appropriate engagement on this strategy.
		72	12	Nga Potiki a Tamapahore Trust	Adopt the outcomes on page 60 as notified.
		86	1	Ngai Tukairangi Hapu Trust	The decisions made regarding accommodation, infrastructure, and initiatives directly influence our community and, by extension, our whanau. We firmly believe that meaningful engagement with our hapu is essential to developing strategies that are culturally sensitive, sustainable, and inclusive. The new plan should provide for opportunities where Ngai Tukairangi can thrive alongside the future growth initiatives that are being implemented within our rohe.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		86	13	Ngai Tukairangi Hapu Trust	5A. Ngai Tukairangi hapu endorse SGS's dedication to fostering cohesive collaboration with their partners and tangata whenua across diverse projects and commitments. We recognise the complexity of engaging numerous stakeholders throughout the Bay of Plenty region, and we are genuinely appreciative of the efforts made in this regard thus far. Continue to ensure Ngai Tukairangi hapu are partnered in discussions about any developments within our rohe.
	2: Capacity and capability	60	4	Tangata whenua collective (CTWF workshop)	<ul style="list-style-type: none"> • Strategy implementation is critical and needs to be resourced well. • Support reference to CTWF outcomes and proposed Marae Centres and Maori Land Development Focus. SmartGrowth needs to ensure that this is adequately funded so that it is as successful and results in tangible outcomes for our people. Need to build capacity and capability within tangata whenua to ensure success is long-lasting. Matapihi would benefit from tangata whenua-led spatial planning.
		69	3	Pirirakau Tribal Authority - Incorporated	12. Pirirakau kaitiakitanga of its rohe has been subsumed by others in terms of decision making where Pirirakau are absent, and they have been largely excluded of SmartGrowth. This continues to threaten the 'hau kainga ahikaroa' (the practice of the true home and its people) of tangata whenua.
		69	6	Pirirakau Tribal Authority - Incorporated	<p>23. We have an industrial area in Te Puna which is the highest population area of Pirirakau hau kainga that was not supported and we continue challenges against future development of outcomes imposing greater traffic movements, harder environmental impacts where the Hakao continues to flow as an area of the largest local environmental contention at this time. We want to better understand and participate in the influences that build urbanisation. The SmartGrowth Strategy has become a flagship that continues to propose further impacts, and no one is listening.</p> <p>24. As Pirirakau and local community (Te Puna Heartlands) wish to engage directly in the future outlook of the rohe. We seek support for a working group to be resourced in our rohe - community to engage in depth in codesign of our future outcomes. To occur before the strategy is adopted. Te Puna, Huharua and Whakamarama being an OFF LIMIT plan within the SmartGrowth Strategy.</p>
		86	6	Ngai Tukairangi Hapu Trust	<p>5A. The significance of Marae centres: In many Maori communities, the marae serves as a central focal point where our whanau gather, especially during times of crisis, a fact notably highlighted during the challenging periods of COVID-19 lockdowns. Our marae/hapu communities, in response to the pandemic, consciously isolated themselves from the broader Bay of Plenty community for safety. During this period, it became apparent that our marae, while deeply valued, lacked essential resources and support to cater effectively to the needs of our whanau. It was a crucial realisation, as it underscored the necessity of bolstering our marae with adequate services and resources. Identifying these deficiencies was pivotal, illuminating the path forward. To truly empower and uplift our whanau within Matapihi, it is imperative that our marae be equipped with the essential services and resources required to fulfill the aspirations of our whanau, ensuring that our marae remains a resilient and supportive cornerstone for our community. 5A(1) Provide for adequate response plans and practical resources for marae centres. Marae often play a huge manaaki role in times of crisis for ALL communities.</p>
		86	7	Ngai Tukairangi Hapu Trust	<p>5B. Maori health clinic: An example of this challenge lies in the accessibility of adequate health services for our whanau in Matapihi. A fundamental aspiration of Ngai Tukairangi is to eliminate the need for our whanau to travel extensively to receive general healthcare. It is disheartening to observe that some of our kaumatua must journey as far as Greerton to access health services from a Maori clinic. Despite the absence of readily available health services within Matapihi, the community is fortunate to have a health education service in place. However, considering the burgeoning population, there exists an urgent need for comprehensive healthcare solutions within Matapihi.</p> <p>5B(1). In this context, the invaluable support under the SGS becomes pivotal. We urge Councils to actively facilitate and empower Ngai Tukairangi in establishing our own Maori health clinic within Matapihi. This endeavor is essential to ensuring that our well-being is perpetually prioritised. By creating a local healthcare facility, we aim to not only provide essential medical services but also foster a sense of belonging and security within our community. The establishment of a Maori health clinic in Matapihi represents a transformative step towards self-sufficiency and well-being, aligning perfectly with our enduring commitment to the holistic welfare of our people.</p>

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		87	11	Ngai Tukairangi Trust	- Strategy implementation is critical and needs to be resourced well. - Support reference CTWF outcomes and proposed Marae Centres and Maori Land Development Focus. SmartGrowth needs to ensure that this is adequately funded so that is as successful and results in tangible outcomes for our people. Need to build capacity and capability within tangata whenua to ensure success is long-lasting.
		87	14	Ngai Tukairangi Trust	There is a need within the sub-region to better prepare hapu,iwi, marae and Maori land trusts for the expected growth. The Trust believes that when councils and other stakeholders are preparing for this growth, they need to also ensure Maori are able to prepare their own communities too. Not after councils, but leading into or alongside.
	3: Integration of maori values in Strategy	60	7	Tangata whenua collective (CTWF workshop)	<ul style="list-style-type: none"> • Don't forget the role of whakatauaki within the strategy. They are a reflection of our values based on our tupuna. For example: <ul style="list-style-type: none"> o Whatungarongaro te tangata, toitu te whenua - As man disappears from sight, the land remains. o Te oranga o te tangata, he whenua./he taiao - The health of the people is drawn from the land/environment. o He aha te mea nui te ao? He tangata he tangata, he tangata! What truly matters in life - it is the people, the people, the people!
		74	6	Waste Management Nz Ltd	Marae and Maori land development focus areas: Waste Management acknowledges its neighbours in the Bay of Plenty, including the Whareroa marae and recognises the aspirations of tangata whenua for Maori land and papakainga development in urban areas. Of relevance to Waste Management is the SmartGrowth Strategy's identification of the Whareroa marae and its surrounding area (including its Oil Recovery Site) as a Marae and Maori land development focus area. As recently submitted on in the context of the Mount to Arataki Spatial Plan, Waste Management acknowledges the desire to improve matters at the Whareroa marae. Waste Management is continuing to consult with local iwi and make sure that its operations are aligned with finding the right balance to enable industry while addressing concerns about any environmental effects. Waste Management considers there are opportunities for the Whareroa marae and adjacent focus areas to work with industry in a way that recognises the neighbouring industrial land use in the area, and to integrate any activities at the marae with those existing industrial land uses (ie avoiding residential development in proximity to industrial activity, and provisioning for appropriate land use buffers). Where careful and appropriate integration between land uses is achieved, Waste Management considers this would be a significant opportunity that will enhance the positive impacts on the Whareroa marae and adjacent development focus areas, providing for the Whareroa community's wellbeing.
	4: Oppose	54	2	Robson, John	No
	5: Support	59	6	Ministry Of Education	The tangata whenua chapter sets out aspirations for tangata whenua, including the challenges that are faced by tangata whenua in relation to growth and development.
		72	10	Nga Potiki a Tamapahore Trust	NPaTT generally support the Tangata Whenua Perspectives on Growth Management in tern of the economic, cultural, social, and environmental matters listed. Adopt the Tangata Whenua perspectives as notified.

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		72	11	Nga Potiki a Tamapahore Trust	NPATT generally support the principles of the NPS-UD as noted, including: <ul style="list-style-type: none"> • Well-functioning urban environments have a variety of homes that enable Maori to express their cultural traditions and norms. • A Future Development Strategy must include a clear statement of hapu and iwi values and aspirations for urban development. Adopt the statements on Page 60 as notified.
		72	13	Nga Potiki a Tamapahore Trust	Adopt and acknowledge the issues listed on page 62 & 63
		72	14	Nga Potiki a Tamapahore Trust	Adopt tangata whenua growth directives as listed.
	6: Tangata whenua spatial plan	87	1	Ngai Tukairangi Trust	The Trust would like to highlight that it would have been more appropriate of both the SGS and MSP to engage with hapu first around whether a program of hapu management plan renewal could be conducted beforehand. We acknowledge that both projects have acknowledged existing planning documents, furthermore UFTI also commissioned a report on 'Tangata Whenua perspectives on Growth Management'. These efforts, however, are not quite the same as tangata whenua being able to determine for themselves, within their own dedicated plans what growth management will need to look like for them. There is also the issue of engagement fatigue which is a very real issue facing hapu and Maori land trust representatives. hap
		87	3	Ngai Tukairangi Trust	Why has the tangata whenua spatial plan not been completed and presented for feedback? The Trust would consider this should have been done first considering the visual representation in the SGS consultation book of it sitting above, and feeding into the SGS.

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Topic	Issue	Sub ID	Sub Point	Name	Summary	
SGS23-03: Climate resilience	1: Managed retreat	7	1	Angela	Consider managed retreat for areas at risk of coastal inundation	
		76	4	New Zealand Kiwifruit Growers	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.	
	2: Support		9	1	Wolf, Eva Maria Lieve	It gives me confidence that you're taking the right direction when I see that the Environmental objective is placed at the beginning of the four well-being objectives; growth always needs to be sustainable when it comes to the planet, we can't grow at the expense of our planet and therefore our future generations!
			22	3	Van De Weyer, Callum	Yes
			32	3	Mcleod, Whitiara	Yes, 70% out of 100q
			53	15	Bowden, Beth Willard	I have no particular argument to make with the description provided in this chapter, except to say that, at least until Cyclone Gabrielle earlier this year, there was only minimal evidence that its principles - and its costs - were being taken seriously. I do think the focus is on the right things, but I think that a sober assessment of likely costs by way of an Implementation and Funding Plan is seriously lacking.
			55	9	Holyoake, Peter	Please hold in mind, during future decision processes, the speed at which climate change is bringing weather extremes to all parts of the world.. The demand for additional accommodation in BoP will grow as other areas of Aotearoa become uninhabitable - the relatively sheltered location of Tauranga and WBoP will be increasingly sought after. The importance of incorporating climate resilience into all future developments cannot be overstated. Making this resilience passive (not requiring a power source) or self-sufficient (power and water generated on site) will avoid the losses of supply already seen recently in Wellington, Auckland and Nelson storms and floods.
			59	7	Ministry Of Education	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. Retain the growth directives as notified.
			86	3	Ngai Tukairangi Hapu Trust	3A. Ngai Tukairangi hapu fully supports SGS's commitment to ongoing research projects and the continual updating of data related to environmental and climate effects. This dedication to accurate findings ensures that communities can stay informed about the conditions of their living areas and the effects of the environment and climate. We appreciate the efforts made to keep the community informed and empowered with knowledge.
	3: Oppose		6	4	N/A, Linda	NO

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		27	1	N/A, Richard	No. Climate change needs to be at the centre of all thinking. Where we live and how we get around.
		28	2	Thorpe, Andrew	No
		37	1	Lois	No.
		47	11	Fitter, Julian Richmond	I see very little evidence that this strategy is really taking into account the environmental and climate issues, and ceratyoonly not the risk from sea level rise or tsunamis.
		47	9	Fitter, Julian Richmond	This has to be the key to everything. Growth in itself is damaging to the environment and the climate, therefore we need to seek at all times to minimise the impact of growth on our climate - there is no evidence that this has been taken into account in the document."
		50	4	Lucas, David Thomas	I believe there are better projects to spend our hard earned money on, than the so called climate change. We humans here in NZ are not going to make one scrap of difference to the overall world climate problem, if there is one.
		54	3	Robson, John	No
		62	6	Envirohub	Climate Change; The issues relating to Climate Change are referred to throughout the document. They receive strong focus in Chapter 03 of the Spatial Plan. We note in particular the introductory paragraphs of the Chapter. However despite these words the 'ecosystems and biodiversity' principle is not noted in many of the Spatial Plan Chapters. This needs to be remedied. As well there is scant mention of any Mitigation approaches which could, if funded and implemented save Councils millions of dollars in Adaptation projects over the 50 year period.
	4: Climate action	46	3	Sadler, Jon	More emphasis should be put on carbon footprint in building infrastructure and homes. Carbon consuming materials such as steel, concrete and polymers such as polystyrene should be discouraged, and wood and recycled products, and other natural fibres encouraged
	4: Climate action	46	4	Sadler, Jon	Local government needs to build partnerships with organisations to provide incentives for businesses to be carbon neutral or carbon positive, and disincentives for operating heavy carbon footprints. Building resilience by offering incentives for small-scale businesses to operate locally to avert congestion and emissions encouraged
	4: Climate action	55	1	Holyoake, Peter	The Strategy Document makes mention of most of the important impacts of climate change and correctly starts with recognition of the importance: "Climate change is the biggest challenge of our time". However, there is no plan of action to address the large contribution to climate change from agriculture in WBoP. 4. SOCIAL - Location of Marae CONCERN: Many Marae are located on land close to sea level. This land and these Marae will flood before most Pakeha settlements. RECOMMENDATIONS: a). Anticipate the flood of BoP's Marae, where they are close to sea level. Some marae are already experiencing floods. Plan and budget to assist the relocation of these marae.

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		55	3	Holyoake, Peter	6. ENVIRONMENTAL - Storm surge, future rainfall and future development locations CONCERN: This concern is most relevant for coastal developments and for developments on flat land, near watercourses. The KRUGA is raised above sea level, with few flat areas. Parts of this development area are up to 100 metres above sea level. This is positive in that it will provide urban expansion areas, which are more climate resilient than existing and recent urban expansion areas around Tauranga. For example, Climate Central published a world map in 2019, which shows projections of flood areas for the year 2050. This map is discussed in a 2020 Newshub article (see link below) The emissions from the agriculture sector are high in New Zealand and WBoP. Yet receive little mention in this Strategy Document.
		71	1	Zespri International Limited	4. CHAPTER 3: CLIMATE RESILIENCE 4.1 Zespri supports the climate resilience principles and growth approach, which align with the Kiwifruit Industry Climate Change Adaptation Plan ¹ released late last year. In addition, Zespri would like to see a focus on regional electricity generation and transmission, enabling decarbonisation and accelerating electrification. Investment and priority given to this would: <ul style="list-style-type: none"> • 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.
		71	9	Zespri International Limited	5.16 Zespri has identified international shipping as critical to reducing our emissions footprint as we work towards our goal of being carbon positive to retail by 2030: we need transformative port infrastructure to achieve this. If larger more-efficient ships can't call at New Zealand ports, exporters will pay more into various ETS and our reputation as environmentally conscious trading partner will be tested. We are working on a green shipping corridor opportunity with one of our shipping partners to drive this work - if successful, it's likely to be the world's first green shipping corridor driven by a customer rather than a port.

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		86	4	Ngai Tukairangi Hapu Trust	<p>3B. Emergency response: With the current impact and effects of climate change, it is imperative to plan ahead and develop strategies to mitigate against the effects of climate change within all areas we are associated with. In particular, Whareroa and Matapihi are particularly vulnerable to the adverse effects of climate change, including rising sea levels, changing weather patterns, and increased frequency of extreme weather events. To adapt, it is imperative to invest in resilient infrastructure, develop early warning systems, and support community-led initiatives that enhance our ability to withstand climate-related challenges. Additionally, there is a need for comprehensive disaster preparedness plans that are culturally sensitive and inclusive of matauranga Maori. reservoir and other infrastructure to safeguard our community's water needs in the face of climate-related challenges.</p> <p>3C. Waste management: Waste management is a significant aspect of our community's sustainability efforts. Implementing a robust recycling and composting program is essential. By reducing our waste, recycling materials, and composting organic matter, we can significantly decrease our carbon footprint. Having efficient systems in place also ensures self-sufficiency and sustainability within the Matapihi community.</p> <p>3C (1). The SGS can support Ngai Tukairangi in establishing and promoting these programs, providing education and resources to encourage active participation from residents. By doing so, we can minimise landfill waste and promote a circular economy that conserves resources and mitigates the impacts of climate change.</p> <p>3D. Effects of erosion: As Whareroa and Matapihi sit adjoined to inner harbour elements, we are prone to the effects of erosion. Some of the areas that are susceptible to erosion in Matapihi include Te Tii urupa, Otumoko urupa and Omanu urupa. Other known areas along the Matapihi peninsula include Oruamatua, Te Ngaio and other historical pa sites. Priority for restoration should focus on urupa to ensure that desecration of gravesites does not occur. Whareroa in particular is 3D(1). Ngai Tukairangi should be supported in the replanting of those banks, as well as planting of native plants/trees along the banks to reduce the risks of erosion on our whenua. We should also be able to proactively advance our own ideas in relation to erosion efforts. subject to erosion with the dissipation of sand on the shoreline.</p> <p>3E. Hapu driven initiative: Ngareta Timutimu, a Ngai Tukairangi descendant has progressed an initial project to address climate control projects within the older areas of the Mauao/Matapihi peninsular and the respective communities. The initiative taken by whanau to assess the local takutai, focusing on the impacts of climate change such as erosion, rising sea levels, and their effects on the foreshore and kaimoana, demonstrates a proactive approach to understanding and mitigating environmental challenges.</p> <p>3E(1). The SGS can provide support by offering expertise in environmental impact assessments, providing data-driven insights into erosion patterns and rising sea levels, and suggesting innovative solutions. The SGS can assist in developing comprehensive climate adaptation strategies tailored to the unique challenges faced by Ngai Tukairangi hapu in Matapihi. Collaborative efforts under the SGS and Ngai Tukairangi hapu can lead to the creation of holistic, culturally sensitive climate resilience programs. By combining traditional knowledge with modern scientific approaches, we can develop initiatives that not only protect our environment but also preserve our cultural heritage and sustain the livelihoods of our community.</p>

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	5: Heat management	55	2	Holyoake, Peter	<p>5. ENVIRONMENTAL / SOCIAL - Heat Management - public spaces</p> <p>CONCERN: Summer temperatures will continue to increase in future years. 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)</p> <p>RECOMMENDATIONS:</p> <p>a). Avoid asphalt use.</p> <p>b). Consider extensive use of tree-lined streets and stands of trees to reduce heat build-up. Maximise the use of light-coloured parking areas and road surfaces to reflect light and heat.</p> <p>c). Consider the Australian trend to use white as a roof colour for Council, commercial and residential roofs.</p> <p>d). Avoid high rise buildings and heat traps - see the following article about Singapore (not all relevant as Singapore is a high-rise city) - https://www.nytimes.com/interactive/2023/09/18/world/asia/singapore-heat.html</p> <p>ENVIRONMENTAL / SOCIAL - Heat Management - residential</p> <p>CONCERN: TCC / WBoP sub-region is an area favoured by retirees, evidenced by the presence of many retirement villages and care homes. This sector of the population is particularly vulnerable to heat. Summers will be increasingly hotter in the future. (See, for example: 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)</p> <p>RECOMMENDATIONS:</p> <p>a). Require all new developments for older people to include passive cooling features - e.g. deep covered verandas, deep window eaves - to allow entry of winter sunlight into the building and exclude entry of summer sunlight. Note that future climate change will bring extended drought periods and loss of hydro power, so passive construction features will provide resilience to climate change.</p> <p>b). Consider the provision of tree-shaded walkways, especially near retirement villages.</p> <p>c). Consider the potential future use of community halls as "Cooling Centres" as has been done during recent heatwaves in the United States (see: 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.</p> <p>d). Ensure that each Connected Centre has a community hall ready to provide this service.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-04: Te Taiao - Our environment	1: Air Quality	1	1	Ranjard, Louis	There is a real concern about air quality in the area, as demonstrated by some recent studies. We're talking about human health. This should be a top priority for the development of the region. I only see limited mention of it in the strategy, promoting green areas and replanting will help but not only, we need imposing standards in the industry and limit the traffic in the area until air pollution returns to safe levels.
		35	1	Low, Jason	Air Polluters need to move out of the mount industrial zone, as the air quality is terrible for the mount Maunganui suburbs health!
		91	19	Sustainable Bop Trust	9. Why is the polluted air shed at the Mount not addressed? Isn't the Strategy the place to look at options to move the polluting industry away from schools and houses?
	2: Waste management	2	3	Smith-Kerr, Stephanie Heather	There needs to be a bigger push for industrial environment protection all these houses being built and all the waste.
	3: Support	17	2	Pirere, Tania	It's amazing how our local doc have been out there looking after our tupuna and making sure that our whenua and Moana are protected by our local widelife caress
		32	1	Mcleod, Whitiora	Yes,
		59	9	Ministry Of Education	The Ministry is supportive of the approach outline in the Te Taiao/Our Environment chapter which emphasises the importance of growth within environmental limits, the maintenance or restoration of a full range of ecosystems, and the development of an interconnected network of open spaces, reserves and ecological corridors. Retain the growth directives as notified.
	4: Oppose	20	1	Chalmers, Nick	How will growth in our area effect resources particularly kaimoana. How will environmental impact of this growth be negated?
		20	2	Chalmers, Nick	How will you negate inevitable pollution caused by growth? What effects do you foresee this growth having on natural resources, in particular kaimoana?
		32	2	Mcleod, Whitiora	but with one glaring omission, data that will indicate whether Te taiao can accommodate the current municipal water take & future municipal take, Mairano.
47		1	Fitter, Julian Richmond	The plan makes all the right noises, but the reality of the detail is that no real priority is given to the environment or enhancing native biodiversity. The Te tumu development is right alongside the most significant river in the region with an important wetland on the opposite bank - it is not realistic to think that such a development will not have a 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.	
53		16	Bowden, Beth Willard	Once again, no-one could argue with description provided but the growth directives seem highly qualified and privileging of human settlement ambitions. And it is barely plausible to offer a directive offering "growth of the western Bay of Plenty [to be] within environmental limits". • What does the term "environmental limits" even mean?	

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		54	4	Robson, John	No
		62	5	Envirohub	<p>The effects of development and the degrading of environmental systems are noted in Chapter 05 Rural especially the loss of wetlands. This is even more so for TCC but is hardly mentioned. Both councils have opportunities to remedy environmental degradation but it needs to be a primary focus not just an afterthought. In the case of TCC the Otumoetai Spatial Plan is used as a case study. It does not mention the environment, yet the concept of environmental enhancement and green corridors for climate change and biodiversity were a key part of discussions for this plan. The transformational shift in thinking and action must place green infrastructure in the same scoping space as built infrastructure. Ecosystems are not an add-on, they are fundamental.</p> <p>To that end, Envirohub notes that in the Integration grey boxes 'Integrate and enhance local ecosystems and biodiversity' has been omitted as it largely has from the growth directives in Chapters 05 to 08 and Chapters 10 and 11.</p> <p>We request that an appropriate environmental growth directive be added to each chapter and the Integration statement on local ecosystems be included in each grey box.</p>
		69	5	Pirirakau Tribal Authority - Incorporated	<p>21. The Taiao implications against the SmartGrowth Strategy are hugely significant and the Strategy enables and influences this direction. Look to the city at the waterways and how they are largely modified and controlled for flooding management. Look to Omokoroa to see how this is also happening. This is not the Taio that is promised to Pirirakau against historic confiscation and the impacts on our natural environment.</p> <p>22. The Takitimu North Link was supported to enable State Highway removal from the local community of Te Puna to best protect the balance of the rohe from Urbanisation. Becoming a catchment that laterally dissects the rohe and wai movements are manmade controlled except where Pirirakau were successful in forming agreements to bridge sections where natural flow continues. Of the balance we seek greater recognition and actions provided for by the NPSFM and NPSIB.</p>
	5: Water quality and management	60	2	Tangata whenua collective (CTWF workshop)	<ul style="list-style-type: none"> • 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.
		87	15	Ngai Tukairangi Trust	Does the SGS consider how the implementation of Te Mana o te Wai and the National Policy Statement for Freshwater Management (NPSFM) may be constrained with the predicted urban growth? The Trust would also be interested in a collaborative approach to understanding how the sub-regions Maori land trusts with horticultural/agricultural/energy nterests (dependent on freshwater) could be impacted by restricted access because of urban growth.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		87	4	Ngai Tukairangi Trust	<p>Within our orchard business, the Trust is undergoing going work to understand the different regional challenges for our orchards, with special consideration given to freshwater quality, allocation and use. Water is fundamental to our orchard operations, and without adequate access to water our business is simply not viable. The impacts of such would be detrimental to our ability to provide cultural, social, economic and health support to our whanau through financial assistance. There are also numerous other considerations that must be incorporated into urban planning processes to help cities effectively manage and protect freshwater resources such as</p> <ol style="list-style-type: none"> 1. Drinking water supply 2. Wastewater and stormwater management 3. Sustainable water use <ol style="list-style-type: none"> a. Water conservation, efficient irrigation, reclaimed water for non-potable purposes. 4. Ecosystem conservation 5. Integrated land-use planning 6. Climate change resilience 7. Public education 8. Emergency preparedness
		87	9	Ngai Tukairangi Trust	<ul style="list-style-type: none"> - Do we have sufficient capacity within the natural environment to handle more people? Is there sufficient water supply for a growing population? We need to ensure our waterways and aquifers are kept healthy and not stressed by over abstraction. - Need to ensure a whole systems approach, from maunga ki te moana.

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Topic	Issue	Sub ID	Sub Point	Name	Summary	
SGS23-05: Rural	1: Oppose	8	1	Goodall, Andrew David	No	
		12	3	N/A, Haley	Dam well look after our famers who produce our food! Stop taxing them into desolation & ruining them with rules & regulations!!	
		53	3	Bowden, Beth Willard	Given that the rural hinterland is such a large part of the region, it receives relatively cursory analysis in the Strategy. The sense of value, however, that the Strategy places on this land is important. In my view there exists considerable scope for building stronger understanding between city and country communities of their mutual reliance on each other.	
		53	5	Bowden, Beth Willard	The Strategy implies, but does not make explicit, the important contribution made by rural communities to environmental protection and conservation. This already provides a well-established coalition of interests between urbanites and country folk and should be acknowledged	
		54	5	Robson, John	No	
		62	4	Envirohub	The spatial assets of Western Bay and Tauranga City are very different. For instance, Western Bay has 16 times more land mass than Tauranga City. whilst land in TCC is constrained, Western Bay has options to be flexible if the effects of climate change and the growth of town centres necessitate the movement of agricultural and horticultural enterprises. Tauranga City, in contrast, has few choices when it comes to land availability.	
		79	3	Upper Ohauti Landowners Group	The Landowners Group agree with the general direction of the SmartGrowth Strategy and the growth directives in the Rural chapter. However, the Landowner Group believes that rural residential living options have been inadequately accounted for, that demand will exceed the projected supply and that provision in SmartGrowth mapping is appropriate and desirable to identify potentially suitable lifestyle areas.	
		2: Support	10	3	Underwood, Ruth	Yes. Really important to retain suitable land for the key local industries. There is a narrow range of suitable sites for our key kiwifruit and avocado industries, in terms of elevation, soils, terrain etc. Once it was citrus, but that has a similar requirement to the current key crops. This land is relatively easy to develop into housing in terms of site factors, so needs 'planning' protection to support the economic basis for the region.
	76		5	New Zealand Kiwifruit Growers	Map 3 is already showing the potential for future growth on areas of Highly Productive Land. We submit that where possible, Highly Productive Land should be protected for appropriate land use such as kiwifruit growing, and we urge the Committee to keep this in mind as they consider the challenges ahead and the need to identify future land areas for housing.	
	3: District / City Plan matters		34	1	Foster, Andrew William	Unlocking more housing options for rural property's. Ie 10m from boundaries on smaller blocks as the restrictions make it too hard. My neighbour has an illegally build shed so I can't build closer than 30m from the boundary on my small 1.3ha property. Even though both neighbours have built on the boundaries. Neighbours won't sign off a minor dwelling so unless i build in the middle of My paddock there's no options.
			53	28	Bowden, Beth Willard	Monitoring and enforcement of land use rules requires to be accepted as an active aspect of Councils' work. Over-reliance on a complaints process generated by vigilant members of the public allows too much latitude to rogue operators.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		79	1	Upper Ohauiti Landowners Group	The Landowner Group submit that the SmartGrowth Strategy should consider as supplementary to the primary focus on urban intensification, provision for lifestyle zoning where it meets appropriate criteria, including SmartGrowth objectives. Effective structure planning would be a critical component of planning for lifestyle areas to ensure appropriate servicing, access, connectivity and provision for ecological enhancement.
		79	2	Upper Ohauiti Landowners Group	The Landowner Group submits that lifestyle or 'rural residential' provision is integral from a SmartGrowth policy development perspective to prevent further ad-hoc fragmentation of these areas. The Landowner Group acknowledges the WBOP District Plan distinction between rural residential and lifestyle zones, with the former generally requiring urban-style provision of services such as water and wastewater. The Landowner Group believes this is an important distinction because the implications (particularly cost) of requiring that extent of infrastructure are significant. The lifestyle zone provides a level of self-sufficiency from a servicing perspective and this approach may be more appropriate in the context of the SmartGrowth objectives.
		86	5	Ngai Tukairangi Hapu Trust	5C. Matapihi rural status: Matapihi's designation as a rural area was a deliberate choice advocated by our whanau and community members, aimed at safeguarding our rural character and preventing extensive urban expansions or residential subdivision projects. Preserving this rural identity is paramount to maintaining our community's integrity. However, this intentional rural status poses a challenge when it comes to implementing essential infrastructure improvements necessary to accommodate the burgeoning population within Matapihi.5C(1). Through the SGS, we can work collectively to develop tailored solutions that cater to our growing needs while respecting the rural character we hold dear. This might involve advocating for specific exemptions or modifications within the rural zoning regulations, allowing for targeted infrastructure improvements without compromising our rural integrity.The fundamental question that arises is: How can Matapihi balance the preservation of our rural status with the urgent need for adequate infrastructure to support our growing population? It is imperative that we find innovative and strategic solutions to address this dual objective effectively.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-06: Urban form and centres	1: Support proposed urban form and centres	2	1	Smith-Kerr, Stephanie Heather	Yes from what I've read. I think the urban centres will reduce traffic. As I know many cutting across town for activities. Having more local activities and centres will reduce the number.
		15	1	Kenyon-Slade, M	Yes, good for 70% of the Future development proposal, however the Tuaranga Council has been repeatedly warned that building expensive Council offices, Library, Museums, esplanade onto the sea ; can not, and will not be successful until such time that a large number of "new" multistory carparks have been built. We suggest 3 to 4 multi story carparks with capacity of 500 to 1000 cars spaced around downtown CBD. Please be warned until the carparks have been built It is a fools errand to think the public will cycle and take a bus from all around the city to visit and enjoy to all these new facilities.
		17	6	Pirere, Tania	Centers are good if you have heaps activities and his going on but maketu do not need those,they already have community Center and Houora that use Tobe used but not do much anymore, that te aware put there greedy hand in thepot
		25	1	Armstrong, Judy	Yes
		36	1	Brown, Monique	Yes, although we want to ensure we have more cycle ways, clean air pollution for our tamariki. Safe pedestrian crossings for railways near schools and wide footpaths. Absolutely love the new wide cycle and footpath along marine parade. Amazing
		39	7	Bennett, Pauline	Lifestyle: Plans base on evidence and principles A strategic platform for community outcomes by each council - Smart Sustainable Growth Forum (or re-establish SmartGrowth Forum. Urban Development: 15 to 20 minute sustainable communities
		40	2	Buhrs, Nicole	I fully agree with intensification of Te Papa peninsula but again it needs a plan and is not up to individuals to subdivide their property and put a 3-storey building in front of their neighbours without any consultation. That will produce more houses but surely not a 'liveable' city where neighbours live in harmony.
		55	4	Holyoake, Peter	I think that the Connected Centres approach makes for a very attractive character to the town centres of Tauranga and surrounds and I fully support the continuation of this approach. Although mentioned elsewhere in the strategy document, it is obvious that the provision of the frequent bus service between connected centres will facilitate the reduction of private transport and improvement in air quality as a result, improving the environment in each connected centre.
		59	10	Ministry Of Education	The Ministry supports the connected centres scenario with compact urban communities planned and supported through local structure plans, placemaking and urban design to achieve good quality social, cultural, economic and environmental outcomes.
		59	3	Ministry Of Education	4. Part 2 - The Growth Challenge The Ministry notes the significant challenges, but also the opportunities for the sub-region when planning for urban growth. The Ministry is supportive of the Connected Centres growth scenario which would see growth occurring in a more intensive way to support a well-connected, multi-modal transport system, and to plan around residents having access to social and economic opportunities within a 15-minute journey time and wider sub-regional opportunities within 30-45 minutes. Relief sought: Retain the Connected Centres growth scenario as notified.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		62	3	Envirohub	<p>The connected centres choice, which is potentially a long term sustainable option to accommodate growth, will depend heavily on the provision of public transport options and the persuasion of our citizens to make such options a first choice. Over the Smartgrowth period EV's etc will likely become the norm but this will not assist congestion on our roading network while the 'live learn work and play' concept becomes the way our communities work. Incentives to change current behaviour will certainly be required.</p> <p>The whole of the Bay of Plenty will continue to grow whether we like it or not. It is up to us to plan, as best we can foresee, for that growth to be within an enhanced environment and a thriving equitable society. We exist and prosper within of the natural ecosystem. If we destroy nature we will not be capable of 'building our futures together'.</p>
		73	3	Property Council New Zealand	6.1 Property Council broadly supports SmartGrowth's Connected Centres Development Strategy. We welcome high quality urban intensification, as our members know that it will help Tauranga and the wider Bay of Plenty achieve outcomes that meet the region's housing, environmental, social and economic ambitions. Property Council also welcomes the intent to encourage the development of thriving local and town centres that provide for greater social and economic opportunities for residents and businesses.
	2: Open space provision	2	4	Smith-Kerr, Stephanie Heather	Green space is packing in some of these potential high urban areas.
		27	3	N/A, Richard	What is happening with te tumu regional park. An asset that families flock to in the weekends and all summer.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		77	4	Socialink	<p>2. Provision and development of green space including public parks</p> <p>Green space is identified in the Strategy as important for a range of solid reasons. However there is limited mention about specific objectives and activities. We note that the transformation Goal 0.5 Restore and enhance ecosystems for future generations is the only one referring to the natural environment. However it does not specifically refer to green space/parks.</p> <p>Recommendation: Plan for an urban public garden/botanical garden accessible by all ages and abilities.</p> <p>We suggest the Growth Directives include mention of development and retention of land so people have access to green space public parks with trees, gardens and nature, no matter their income, age or mobility level.</p> <p>We believe it is important that the Strategy pushes for purchase or redeployment of land for a public park/botanical garden within the urban boundaries of Tauranga, as the largest regional city. A common feature of many cities is a large public park, often with a botanical garden that provides education and research efforts to help the local community with planting and gardening suitable in the local climate, and that are open to and accessible by all.</p> <p>Tauranga is very poorly off for such urban parks, presumably due to lack of visionary planning by our previous city councils. It is difficult to understand why land was not been set aside for this purpose during the various iterations of council since the 1960s. While the western Bay of Plenty area does have several parks outside the city boundary such as McLaren Falls Park and TECT Park, these are some kilometres away and only accessible by vehicle.</p> <p>(Other cities often have similar parks outside urban boundaries as well as their large urban garden park, so local authorities cannot use the existence of these two parks to say we have provided along the same lines as other cities).</p> <p>Perhaps too much emphasis has been put on the harbour and beaches as people's recreational places. These areas will be less accessible to many people in terms of hot climate, sea rise and the proportion of the population in the older age group.</p> <p>The Western Bay of Plenty is blessed with beautiful coast line, beaches, rivers and estuaries and opportunities for people to walk in native forests ('bush') such as in the Kaimai Mamakau ranges. However for many people such options are not what they will enjoy, or the sites are beyond their physical safety, mobility limits or they can't afford to get there.</p> <p>On the other hand, a large urban public garden will be generally reachable to all through private vehicle, bus, cycling or walking.</p> <p>Urban Tauranga does have large green areas such as Kopurererua Reserve and Carmichael's Reserve, with walking, cycling and wildlife and water management areas, cultural heritage areas and in the case of Carmichael's Reserve, a playground. However these reserves offer a different experience to green space public gardens.</p> <p>Public gardens such as botanical gardens are developed in a way that means they are more accessible and useable to all age groups, from infants to the very elderly as well as people with different levels of mobility and ability. They generally have multi assets such as sweeping lawns, places where people can picnic or sit comfortably, paths, large trees, gardens, glass houses, water features, sculptures, playgrounds and so on.</p>
		77	5	Socialink	<p>Tauranga city has many small reserves some of which fairly narrow and link one part of a suburb to another such as through The Lakes area or in Papamoa, but these are not particularly usable as green, treed and wide open space for people and their families to relax.</p> <p>All citizens and residents should have access to such a space that a public park can provide and it should be of substantial size. Not only is the aesthetic pleasure and enjoyment of such spaces with family or whanau, there are many health and wellbeing benefits to people able to be surrounded by and relax in nature, in gardens, amongst trees. As the Strategy notes on pg 96, 'Access to nature has benefits for people living with mental illness. A UK study found that people who lived in neighbourhoods with more vegetation and birdlife were less depressed, anxious, and stressed.'</p> <p>Access to such commons that public gardens provide will be particularly important when there is an emphasis in the built environment on intensification of dwellings, smaller sections and apartment living.</p> <p>Our public gardens and parks were set aside by forbears for the benefit of all, in the knowledge that it would take many years for trees to grow to stature. We believe it is well past time Tauranga had such a development.</p> <p>The Strategy notes there are pockets of deprivation and poverty, the most deprived areas being largely urban and close to the centre of Tauranga. They in particular will benefit from access to beautiful, treed public parks and gardens.</p> <p>Public gardens are also a golden opportunity to educate and demonstrate to the public about plants, gardens and the natural. They would also enhance the experience of living in the WBOP for the wider population as well as for visitors to the region.</p> <p>The current 85 ha Greeton Maarawaewae reserve/Tauranga Race Course area may be one option to develop. Unfortunately it appears to be one of the last remaining areas of land suitable for a public treed park within the urban area. Its contours mean it is relatively accessible however.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		77	6	Socialink	<p>2. Further develop urban existing reserves, parks and esplanades</p> <p>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?</p> <p>For example, Tauranga City Council's Reserve Management Plan lists 292 reserves, parks and esplanades. Some of these have historical, cultural or natural significance. Others are quite small and perhaps could be developed into community gardens or allotment space still owned by Council but peppercorn rented to local residents.</p>
		77	7	Socialink	<p>The Strategy notes in terms of housing, connected living and that "many purchasers are not demonstrating a strong desire to "downsize". They are not yet seeing the value of living smaller but closer to services...It is imperative to build climate resilient communities, however the western Bay as a community does not yet recognise the benefits of the "15-minute neighbourhood", over the "quarter acre paradise"." (pg 112)</p> <p>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.</p>
3: Oppose		24	1	Cooney, Graham	<p>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.</p>
		25	2	Armstrong, Judy	<p>Do not spread out, go up with buildings. We want green land and be able to grow crops</p>
		27	4	N/A, Richard	<p>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.</p>
		33	2	Sanderson, Nathan John	<p>Review town centres: Tauranga CBD, Mount Maunganui CBD, Bayfair, Papamoa, Te Puke, Otumoetai, Bethlehem and Omokoroa.</p>
		39	10	Bennett, Pauline	<p>Stop Tauriko. Tauriko development - will lead to intergenerational debt. Intergenerational debt can not be serviced by an ageing population.</p>
		39	8	Bennett, Pauline	<p>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</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		40	1	Buhrs, Nicole	<p>I personally want to live in a "liveable" city where everything is close by, where I can bike safely, where I can take a form of door-to-door affordable public transport with no need for a car, where there are lots of trees and green spaces, where there is a community hub in the neighbourhood etc...</p> <p>If the region wants to plan for more people, it needs a PLAN. At the moment development is developer driven and that has led to suburbs with no soul, no community facilities, no shops at walking/cycling distance, no employment close by, standard one storey 3-to-4-bedroom houses, no provision for walking/cycling paths between streets etc...</p> <p>We have seen this happening in Rolleston where at some stage Selwyn District Council realised that the town centre had been 'forgotten'! No wonder if there is no plan before starting development. A town centre has now been created by taking part of the reserve. Houses that were no more than 10 years old and were built in a residential zone had to be demolished to make place for shops after the area had been rezoned commercial. What a waste of time/ resources and money!</p> <p>Under Norman Kirk in the 1970s there was a plan for developing Rolleston but there was no plan when Rolleston's development took off in the 2000s. What a disaster. Is this the kind of development we are going to see in Tauranga?</p>
		41	3	Mollison, Margaret Helen	<p>Intensification clearly needs to occur, but this needs to be in the form of affordable accessible and energy efficient houses, with a smaller footprint. There also needs to be a mixed model of accommodation, and an awareness of the ongoing issue of homelessness so that we can accommodate all groups in our city. Growth will have to be organic as sites gradually transition to higher intensity, ground stability needs to be assured, and people need to change their expectations from the NZ quarter acre dream. Red tape bureaucracy needs to be reduced to allow more affordable planning approval, at the same time as a robust city plan to ensure that developers are given clear guidance on acceptable development. Attention needs to be given to adequate green spaces and tree corridors to allow for recreation and community activities, good mental health, and the restoration of waterways and wildlife in the city. Good recycling and waste systems that have been initiated, need to be enhanced and entrenched. Industrial areas need to also be clearly demarcated to avoid urban sprawl and maximise land use. Renewable energy should be the norm, such as solar panels on all new builds.</p>
		42	6	Gordon, Carole	<p>2 Sustainable Hyperlocal Communities.</p> <p>The UFTI plan details a roading network of connected 'business' centres. The draft Strategy assumes that these circle sites somehow 'just become' interactive 15minute liveable communities supplying a network of essential services. Confusion exists.</p> <p>It is commendable that that a 15minute model is referenced (p101). However, the strategy fails to canvas a master plan for the development hyperlocal liveable communities, for live, work, learn play and age sustainable environments. It lacks a people heart. The commentary is probably insufficient to drive serious spatial plans to action a changed investment by partner Councils. A shift is needed to recognise and actively structure hyperlocal communities as a critical policy and process to reducing congestion and emissions, to build locality social and cultural, economic stability and social connectivity. The 15 minute or Hyperlocal community model is a proven outcome from commitment to intensive co-design processes that provide accessibility to essential services and social cohesion. It offers first and last mile mobility options to reduce emissions, includes vital intergenerational greenspace and access to health and social care services. The Strategy should adequately reflect planned investment in liveable age-friendly communities congruent with the New Zealand Aotearoa Better Later Life Strategy 2019-2034.</p>
		42	9	Gordon, Carole	<p>2.1 Reframe Strategy sections 6 and 10 to specifically to define and reflect a planning focus on hyperlocal 15min neighbourhood infrastructure development in a context of liveable intensified communities. Noting the difference between UFTI connected transit centres! The strategy(p101) makes this explanation clear, but conceptually it is not well integrated as a transformational shift for investment.</p>
		46	2	Sadler, Jon	<p>There is an assumption of planners that large-scale growth should be encouraged and accommodated. Most residents would disagree with this economic imperative. It provides no gain socially, environmentally or for most people in employment. There should be more of an emphasis on developing small and intimate business and social medium-density nodes that provide most of the social, economic and environmental services we need. Developing large urban sprawl that encourages massive growth and congestion should be discouraged. Planning for smaller-scale condensed settlements with a hub of services and alternative transport choices should be more encouraged.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		47	2	Fitter, Julian Richmond	Assuming tht the population growth projections are valid, then there is a clear need to develop a much more cohesive housing and transport strategy. You suggest existing urban areas should aim for 30-50 dwellings per hectare, this is very low when it should be 50-100 if you are serious about developing affordable housing. Likewise that new growth areas should have a target of only 30 DPH, that is way too low. We know that we cannot develop an effective publiuc transport system if the housing density is too low -Serious densification is absolutely critical.
		53	4	Bowden, Beth Willard	I advocate for more and better inclusionary zoning principles to combat the ad-hoc 'creep' at the margins of peri-urban, industrial and commercial development areas by way of Private Plan Change applications. This is especially important if Connected Communities becomes an accepted element of the District Plan
		54	6	Robson, John	No
		57	0	National Council of Women	Connected centres do not always result in centres with community amenities unless there was a focus to achieve this goal. Strengthening communities is a significant step in achieving sustainability and wellbeing.
		61	6	Child Poverty Action Group	Connected Centres and UFTI: The current model has focused development into existing urban areas. We see rural areas remain relatively isolated due to lack of access to public transport and struggling without services such as affordable high speed internet connections. The WBOP has a significant rural population who are often disadvantaged.
		74	7	Waste Management Nz Ltd	Waste Management acknowledges that housing supply is an important issue for New Zealand, Tauranga and the Western Bay of Plenty subregion, and that it is appropriate that steps are being taken to address it by enabling intensified housing within the Tauranga urban area. However, it is essential that industry and infrastructure that supports well-functioning urban environments, are not adversely impacted by new, intensified housing and that future residents are located in appropriate living environments. The SmartGrowth Strategy expressly identifies the suburb of Arataki as an existing urban area intended for increased density and housing choice. 3 This area is directly across State Highway 2 from the Truman Lane Site. There is an inherent conflict within the SmartGrowth Strategy in that, while it recognises the need to provide for industrial land and outlines that the development and / or redevelopment of existing industrial zoned land will help meet the shortfall in demand, it also directs for intensified residential development in areas proximate to those existing industrial areas (including the Truman Lane Site and Oil Recovery Site). It is fundamental that that conflict is well-managed to ensure existing industrial activities can continue occurring without undue constraints, as well as to ensure that communities are located in healthy living environments. Intensified residential development built in proximity to industry and infrastructure, such as the Truman Lane Site and Oil Recovery Site, have the potential to give rise to reverse sensitivity effects, which can lead to constraints being placed on the activities being undertaken at those sites. While Waste Management is committed to being a good neighbour and endeavours to internalise as much of its effects as possible, the nature of Waste Management's operations (and acknowledging that this is the same reality for industrial activities more generally) means it cannot practicably internalise all of its effects in every instance, and any increase in the number of residents in proximity to its activities means an increase in the number of receivers of potentially adverse effects.
		75	8	Andrews, Julie	My question is, how will our local Councils achieve quality intensification if developers can opt for more profitable greenfields projects? I think the time has come for strong urban planning and incentives to counteract the developer led growth we've seen up until now. It's natural that developers will go where they can make the most profit most easily, so it's a matter of figuring out how to work with that. It's not new; - as you will be aware there are plenty of examples overseas where central and local government have been very strict on urban planning to ensure places are liveable, have sufficient greenspace, foster community, etc. The liveability aspirations are well described in the Strategy (eg at page 45 - "Liveability and placemaking", and at number 2 on page 83 which states - "Population growth and intensification increases demand for recreation facilities, open spaces, green space and parks").
		75	9	Andrews, Julie	The type of intensification selected for different areas is important. I and many others, much prefer the two or three storey townhouse-type homes that have popped up in Christchurch to 4 - 8 storey apartment blocks. This seems to be the "sweet spot". Back to the point about incentivising developers to choose intensification projects. One way of limiting sprawl and making intensification projects more viable is to turn off the tap on greenfields growth, or at least reduce it to a trickle (so maybe 3,000 homes in Tauriko which is the growth that Waka Kotahi is confident the current infrastructure will handle). Given that TCC's commissioned report concludes that the Reasonably Expected Realised number of dwellings for intensification (taking into account the commercial realities) is 19,000, deferring greenfields development to encourage intensification seems a feasible proposition.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		83	2	Bell Road Limited Partnership	<p>Bell Road LP's submission is that the Draft Strategy needs to adopt more enabling and fluid policy to enable the delivery of residential and employment land based on:</p> <ol style="list-style-type: none"> 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.
		84	4	Mcmaster, Bill	<p>1.16 Part 3 of SGS outlines the Spatial Plan which identifies areas for growth and areas to protect. I would suggest that the SGS should recognise the iconic nature of Mount Maunganui North as an area to be protected from high density intensification and seek to retain the generally low rise nature of this area.</p> <p>1.19 The proposed expanded Mount Maunganui Precinct (Mount North) however is an entirely unsuitable location for high density residential intensification and there are other locations in Tauranga much better suited such as the TePapa Peninsula. This will be borne out of the SGS is completed.</p>
		85	2	Tauranga Crossing Limited	<p>13. TCL disagrees with the proposed commercial centres strategy and the lack of distinction between the size, scale, and catchment of the centres. The Strategy has only identified City Centres, Town Centres, and potential town centres, which does not reflect the current or future reality of the commercial centres in the region. As such, the Strategy does not appropriately support the "Connected Centres" programme or appropriately implement the requirements of the NPS-UD, or the NPS. It will potentially hinder development potential and well-functioning urban environments as discussed further below.</p> <p>14. The NPS-UD requires a shift in thinking when planning for urban growth. In creating well-functioning urban environments, it is no longer efficient to have a "flat" hierarchy with the city centre at the top, followed by town centres. Rather, Objective 3 of the NPS-UD requires greater enablement of urban intensification in areas which have many employment opportunities, or are well-serviced by public transport, or where there is high demand for housing or for business land in the area. This requires a clear framework to be put in place to direct urban intensification to appropriate locations to support planned growth.</p> <p>15. The NPS-UD also encourages a nuanced hierarchy of development around urban centres (Policy 3, Policy 4). By not differentiating between metropolitan centres, town centres, and other types of centres, the Strategy does not encourage the "Key Growth Area" centres to grow to meet their potential. This is a lost opportunity to create a more efficient development pattern and does not align with the general objective and policy direction in the NPS-UD. A more nuanced centre hierarchy is required to allow each type of centre to grow according to its unique potential, role, and catchment.</p>
		85	4	Tauranga Crossing Limited	<p>19. As set out above, TCL disagrees with the proposed commercial centres strategy and the lack of distinction between the size, scale, and catchment of the centres. The Strategy currently identifies Tauranga Crossing as a "Town Centre" for the purposes of the commercial centres strategy. The NPS describes the Town Centre Zone as:</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		91	10	Sustainable Bop Trust	<p>A Flawed Growth Model</p> <p>We have reached the following interim conclusions:</p> <ol style="list-style-type: none"> 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.
		91	15	Sustainable Bop Trust	Why are there contradictions between the SG Strategy and TCC documents, in regards to numbers and timeframes for new dwellings in Western Corridor?
		91	16	Sustainable Bop Trust	How does final shape of PC33 (and new government) influence this Strategy?
		91	9	Sustainable Bop Trust	Concerns About the Implementation of NPS-UD and PC33
4: Commercial centre		81	5	Urban Task Force	It is essential for the Commercial Strategy Review to be completed on a subregional basis to achieve a consistent outcome. This work is overdue and needs to be led by Tauranga City Council and prioritised. The indicative Centre Strategy as set out, is woefully inadequate and further urgent work is required to be completed on this. The review needs to be based on collaboration with stakeholders from inception through to completion including the development community, taking into account any completed spatial plans.
		82	4	Batchelar, Craig	Tauranga Crossing appears to show as a 'Potential Town Centre' dot on Map 12, but table identifies it as a 'Town Centre'. Increase size of dot to match Town Centre.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		83	8	Bell Road Limited Partnership	Commercial Strategy Review It is essential that the Commercial Strategy Review ¹ be completed on a sub-regional basis to achieve a consistent outcome. This work is long overdue and needs to be completed by Tauranga City Council and prioritised. The indicative Connected Centres Strategy as set out is inadequate and further urgent work is required on this. The review needs to be based on collaboration with stakeholders from inception through to completion, including engaging the development community and tangata whenua, and also taking into account completed spatial plans. Engaging with the development community after completion of the bulk of the technical work will miss key information and opportunities and is a recipe for future conflict and rework. This engagement should be included as a key action in the Implementation and Funding Plan. In the interim, all commercial centres identified through spatial plan processes or existing City or District Plan Centre Network maps should be included.
		83	9	Bell Road Limited Partnership	Commercial Strategy Review It is essential that the Commercial Strategy Review ¹ be completed on a sub-regional basis to achieve a consistent outcome. This work is long overdue and needs to be completed by Tauranga City Council and prioritised. The indicative Connected Centres Strategy as set out is inadequate and further urgent work is required on this. The review needs to be based on collaboration with stakeholders from inception through to completion, including engaging the development community and tangata whenua, and also taking into account completed spatial plans. Engaging with the development community after completion of the bulk of the technical work will miss key information and opportunities and is a recipe for future conflict and rework. This engagement should be included as a key action in the Implementation and Funding Plan. In the interim, all commercial centres identified through spatial plan processes or existing City or District Plan Centre Network maps should be included.
		85	1	Tauranga Crossing Limited	12. Although it is acknowledged that the classification of centres may be subject to change following the outcomes of plan changes to the Tauranga City Plan and Western Bay of Plenty District Plan (and that further work is required in terms of developing a detailed sub-regional commercial centres strategy), it is important that the direction in the Strategy appropriately reflects the intended role and function of each centre in the sub-region. The Strategy once finalised will become an important document that will have an influence on other resource management processes in the future.
		85	0	Tauranga Crossing Limited	The draft strategy assumed that people would be prepared to take a 30 to 45 minute journey to meet their sub-regional needs which was seen as highly inefficient. In most cities it took no more than 20 minutes, if not significantly less to meet those sub-regional needs. It was noted that 28% of visits to Tauranga Crossing came from outside of Tauranga city. However, TCC's evidence, in terms of how they had classified their centres, was focused on only what happened in Tauranga City. The 28% of visitors who came from outside of Tauranga city was twice the rate that Mount Maunganui drew from outside of Tauranga City. It was very much operating as a sub-regional centre, meeting a much wider range of needs than just the immediate and local catchments. Another drawback of this flat strategy/city form was that it led to replication of offer between all the town centres. There would be no ability for some of the larger retailers to meet the wider needs of the sub-region by providing larger outlets in sub-regional or CBD locations. In order to meet the needs of the entire population, they would have to provide smaller stores if possible, within many centres. This was an inefficient way for a city to operate which did not allow for any significant conglomeration benefit, where other business would choose to co-locate with some of the larger activities that could occur in metropolitan centres. It was understood that some of the restraints placed on Tauranga Crossing related to the impact to the CBD. It would require an additional 90 thousand or more square metres of Gross Floor Area (GFA) zoned at Tauranga Crossing before there would be a ten percent impact on the CBD. In Mr Akehurst's opinion, this was not a risk that should result in significant constraints being placed on Tauranga Crossing. In looking at the SmartGrowth Strategy, the concern was that the existing classification of the town centre, in grouping all of these things together, there may be other centres that were more important in terms of accommodating that growth relative to the various growth areas. It was important that this was recognised within this strategy, one of the key reasons being that funding was a significant risk to a lot of the growth that had been forecast. Critical to this funding was having the right centre hierarchy to direct where the funding should be prioritised so that there would be some areas that would be more important in terms of funding and infrastructure. The metropolitan area of the Tauriko commercial zone, recognised as a sub-regional centre, would be very important in terms of directing where all the funding and infrastructure needed to go in and around that area. This needed to be recognised in the strategy.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		85	0	Tauranga Crossing Limited	In economic evidence presented on behalf of Tauranga City's District Plan Change 33, Mr Heath identified that Tauranga Crossing will require a further 1.5ha of land by 2033 and 3.1ha by 2043 in order to accommodate anticipated growth in the Western Corridor and beyond that is likely to be focused on the centre. This makes it the fastest growing "Town Centre" in Tauranga, while still ignoring the sub-regional role the centre plays across Bay of Plenty Region and even into the Waikato, this is discussed further below." "Within the PE report, Tauranga Crossing is classified as a Town Centre. Currently the TDC centre hierarchy has the City Centre then Town Centres, Local Centres and Neighbourhood centres. Tauranga Crossing is the 5th largest developed Town Centre (out of 8) in terms of the land area (Zoned extent in ha according to PE) at 13.4ha. However, based on PE's assessment of growth, by the end of the study timeframe (2043) it is the largest developed Town Centre, at 23.1ha (excluding The Sands which has area zoned but is not developed)." "A key rationale put forward by Tauranga City Council in PC33 as to why they do not consider Tauranga Crossing to be a Metropolitan Centre is that it does not have a walkable catchment, and therefore it is not suitable for additional density. However, given Tauranga Crossing's current role in terms of meeting wider needs across the sub-region, there is no reason why providing for residential to co-locate with the centre would not provide a similar effect to having growth occur within a walkable catchment. As I understand it, residential activity and visitor accommodation are both non-complying activities within the centre.
		88	1	Jwl Investment Trust	JWL supports the intent of and need for the Smartgrowth Strategy. It is essential that the Commercial Strategy which forms part of the Smartgrowth Strategy, takes into account and is not inconsistent with, the work which has been recently completed to plan for Tauranga City's growth and intensification. In particular, the Te Papa Spatial Plan. JWL requests that amendments be made to the Draft Strategy. The Centres Strategy (Page 104 and associated maps) needs to be updated to refer to Gate Pa Town Centre in the list of Town Centres. This amendment takes into account the matters raised above and correctly reflect the important Town Centre role and status of Gate Pa under the Te Papa Spatial Plan.
		90	2	Bluehaven Group	6. We are seeking recognition in the SmartGrowth Strategy of Wairakei - The Sands to be defined as a Metropolitan Centre under definitions in the National Planning Standards (NPS). 7. Wairakei - The Sands is the only Centre, currently listed on page 104 of the SmartGrowth Strategy as a Town Centre, that fully meets the definition and scale of a Metropolitan Centre, under the NPS. it is intended to be predominantly for a broad range of commercial, community, recreational, and residential activities" and is "focal point for sub-regional urban catchments.
		90	3	Bluehaven Group	14. It is understood that's Tauranga City Council is undertaking a review of its Commercial Centres Strategy in 2024. The classification of Wairakei - The Sands in SmartGrowth as per the NPS definitions is important to signal its importance in providing urban development and amenity for the sub-region and to deliver/support key Eastern Corridor outcomes listed on page 136 of SmartGrowth and other improvements in the region. 15. SmartGrowth should signal the role of Wairakei - The Sands before the Tauranga City plan review of its connected centre network.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-07: Housing	1: Sustainability	2	2	Smith-Kerr, Stephanie Heather	I think Tauranga can do a lot more for the environment all the new builds should have rain water reserve for gardens.
		10	1	Underwood, Ruth	Yes. These things are very integrated - would like to see more new housing built to 'green' and 'accessibility' standards, which would help reduce power usage, maybe generate at least hot water heating if not electricity panels on the roof etc.
	2: District / City Plan matters	17	3	Pirere, Tania	Due to the way maketu is situated I think it would be safe to add more houses especially along and up town point up by aware st that would be safer I suppose and only tangata whenua should be able to build there. Not people from other countries.
		39	1	Bennett, Pauline	Inclusionary zoning is a key part of the housing strategy.
		60	5	Tangata whenua collective (CTWF workshop)	• Resource consent processes need to be streamlined. We want to be able to respond quickly to the growing needs of our whanau, especially those who can't afford to rent/buy and to enable those who want to move home.
		80	5	Hickson, Paul	People often object to the loss of valuable farm land, so care has to be taken in sitting settlements. However there are many pockets of land in the East that would be suitable. One suggestion that a WBOP councillor made was that rural owners should be allowed to build an extra dwelling on their lots without resource consent. This should be considered as land owners are the best placed to look at the cow or person argument. An advantage of this approach is that they would provide the infrastructure.
		87	12	Ngai Tukairangi Trust	Resource consent processes need to be streamlined. We want to be able to respond quickly to the growing needs of our whanau, especially those who can't afford to rent/buy and to enable those who want to move home.
		91	28	Sustainable Bop Trust	22. Why isn't inclusionary zoning a key part of the Strategy?
	3: Support	3	2	Wansbrough, Nathan James	Yes
		10	1	Underwood, Ruth	Yes. These things are very integrated.
		22	1	Van De Weyer, Callum	Yes
		72	18	Nga Potiki a Tamapahore Trust	Adopt identification of housing issues identified on Pages 111, 112, 113 as notified.
		72	19	Nga Potiki a Tamapahore Trust	Adopt housing system growth directives as notified.
		72	4	Nga Potiki a Tamapahore Trust	NPATT agree with and support the challenge that housing demand is outstripping available supply and recognises the current affordability issues around housing. NPATT also acknowledge that the availability of land supply for housing is an issue. Adopt the challenge as notified.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		75	0	Andrews, Julie	I endorse a "paradigm shift" and "using all the tools available" to ensure future development provides the range of housing options the community needs.
4: Oppose		19	1	Lee, Jared	NO
		21	2	Wilson-Jenks, Wendy Ann	Please concentrate on council core priorities and leave housing issues to central government!!
		42	21	Gordon, Carole	No I am not confident. The market has failed. We have a housing crisis This region has failed to provision homes for an ageing population - to build affordable choice - to plan for later life lifetime homes and care. The retirement village model is unsustainable and socially divisive. Affordable Elder housing - own or rental in communities that care is a long term necessity. Green field growth is not suitable for older peoples lives. The Strategy does not meet the requirement for Elder homes - insufficient linkage between demographic reality and intensification planning. Give known growth of numbers of older-old people there should be a whole section examining and catering to their health and social care delivery. Why is this connection not being made? We must tackle ageism. It is a human rights issue and must be more adequately addressed. Elders should be engaged in design and planning.
		53	21	Bowden, Beth Willard	At least because it gathers the bleak realities of the Bay of Plenty's housing crisis together in one 17-point list, the Strategy is to be commended. Merely re-stating the challenges, however, is insufficient. The Strategy offers no path towards any real prospect of an increase in public housing supply or tenure law reform that might lead to the stated aspiration of increasing affordable housing.
		54	7	Robson, John	No
		75	5	Andrews, Julie	In terms of "homes for everyone", there is an acknowledgement at page 112 of the Strategy that intensification and some new greenfields will address the housing shortfall, but under the current market dynamics, it is unlikely to address housing affordability. It also notes there are limited examples and products for "alternative tenures", such as build-to-rent, co-housing, or shared ownership. Especially given Kainga Ora's involvement in the sub-region and its purchase of land in the western corridor and along the central corridor, the continuing lack of affordable homes is extremely concerning. I understand that there is no prospect of affordable homes in the western corridor because of the cost of the land and civil works, and that along the central corridor there are geotech issues which prevent the construction of high-rise.
5: Stronger role for local government		26	1	Nicholson, Scott Weston	"There needs to be a greater emphasis on the role of councils in addressing housing stress and the needs across the region. Councils stand at the forefront of housing transformation. By leading the creation and implementation of local housing strategies, as emphasized in the Government Policy Statement on Housing and Urban Development, they can effectively address community housing needs.
		93	3	Ralph, Christine	VIII. Ensure that each Council has staff skilled in housing development to undertake the facilitation and advocacy roles as defined. This must include continuing with the Housing Action Plan Working Group or equivalent name, provided that it contains at least 50% membership of people who actually are working in the housing development sector and can facilitate collaboration and advocacy for housing projects.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
	6: Housing action plan	26	0	Nicholson, Scott Weston	Here's what can be done: - Development of Evidence-based Housing Plans: Construct action plans grounded in solid data. - Leverage Resources for Optimal Housing Outcomes: Utilise available resources to bridge the housing gaps, particularly in areas like assisted rental, ownership, and community housing provision. - Collaboration to end homelessness with a housing first approach: The focus should be on championing the needs of those most susceptible to housing stress and homelessness in the region.
		39	2	Bennett, Pauline	Discretionary zoning so that Elders are acknowledged in Social Housing allocations. Currently elders can not get on the MSD social register. Home ownership priority - Tauranga must aim for 80% home ownership. Government rental properties must priorities rent to own. This provides security of tenure, health benefits and property care/maintenance Until home ownership is 80%+, government housing must priorities sustainable provision of Elder housing. All other groups can come within rent to own policies 3 to 8 story single floor apartments priority - provide security of tenure even if privately owned, with priority for Elder Social Houses and rent to own for all other groups. Development within current urban areas. 3 - 8 story single floor apartments within the current urban area (19,000 TCC's RER) will address the current housing shortage without the need for debt inducing road infrastructure development at Tauriko. Affordable homes - are homes that can be purchases by the medium income (\$32,000pa) Social Housing Funding - priority should by CHT (Community Housing Trust) not MSD
		39	3	Bennett, Pauline	3 to 8 story single floor apartments - because lifts are required therefore there is no discrimination against Elders and persons with disabilities. Development within the current Urban areas. 3 to 8 story single floor apartments priority - provide security of tenure even if privately owned, with priority for Elder Social Houses and rent to own for all other groups. Development within current urban areas.
		39	4	Bennett, Pauline	Social Housing Funding - priority should by CHT (Community Housing Trust) not MSD
		39	5	Bennett, Pauline	Government must lead development with Smart Sustainable Plans not developers. Incentives can lead to development in the right way and the right place (within the current urban areas). Stop boundary development, commit 15 - 20 minute communities, commit to public transport. Plan for Elders and Young Maori. Develop communities that are self sustaining. Green spaces - set a space per household
		42	13	Gordon, Carole	A variety of partner Council, housing assessment and SmartGrowth reports place numbers, 'hundreds and thousands,' of houses geographically connected to roads, without a definitive focus on who the houses are for and how their livelihood wellbeing needs may be best served. The need for many more homes for Elders cannot be met by intergenerational wealth capturing village settings. New urban models for Elder living are required. Has planning become a game of shifting house widgets at whim, without sufficiently challenging the efficacy of the growth logic or considering the legislative and ethical imperative for well-being.
		42	16	Gordon, Carole	3.4 Invest in new urban Elder living environment models.
		42	8	Gordon, Carole	Why is the Elder Housing crisis not identified as a priority for collaborating with Government, to do things differently? When will Elder homes needed be located in intensified hyperlocal communities? We have not built suitable lifetime houses for a variety of known reasons. We now face a scenario where evidence shows a 70% growth of people over 75-100+ years with a prospect of increased demand for rental community-based lifetime homes and community-based elder care supply. Where are the strategic processes to ensure solutions to design, innovate and build supply? Are the profits from the City Council Elder Villages sales being honourably utilised to overcome barriers to maximise and revolutionise Elder housing provision in ecosystems that improve wellbeing to reduce costly hospital care? We can learn from global initiatives. Yes please "do things differently". Be transformative and decide how we will do things differently with a focus on discretionary zoning, home and neighbourhood design, with mobility systems that offer far more than current non-accessible, often non-applicable transit routes to 'centres.' Plant more trees, make many parklets, waterfalls and beautiful gardens to make people cool and happy and connected.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		53	24	Bowden, Beth Willard	Another concern about this section of the Strategy is the absense of 'quick wins'. We need more housing, now. The problems and challenges have been exhaustively examined and endlessly discussed. More devolved solutions, taking advantage ("Connected Centres") of patterns of settlement where clusters of 2-3000 people already live amongst exisiting transport and water reticulation systems, should be being examined now and not relegated to the Future Development Strategy section.
		53	7	Bowden, Beth Willard	Absent inclusionary zoning or even more prescriptive planning controls, how is the impact of competing land use to be managed? Assuming reliance is placed on spatial planning processes (as per the Otumoetai Case Study), how are these embedded into the Council planning process?
		61	1	Child Poverty Action Group	Chapter 7 - Housing in the Smartgrowth Strategy 2023-2073 has summarised some of the challenges in the housing sector but has not identified solutions. It has been well documented over time that housing problems in the WBOP are very serious and have proven very difficult to solve, both for the short term and long term.
		61	3	Child Poverty Action Group	Affordable Rental Housing: WBOP has both expensive rentals and a shortage of suitable rental homes. "The ongoing failure to deliver affordable private rentals makes a strong case to focus new spending on longer term solutions such as social housing, incentives to build new affordable housing, and shared equity rental, rather than short term rent subsidies" : CPAG Greg Waite.
		61	4	Child Poverty Action Group	That said, we must remember that housing for larger families can also form part of intensification strategies. It is not only important for the accommodation of children, but also multi-generational households. Those in poverty should not be marginalised to the sidelines, we must ensure they are integrated with society and are supported responsibly. This creates truly diverse communities.
		61	5	Child Poverty Action Group	Reversely, many elders who are financially viable hesitate to downsize. An assessment of the occupancy within existing housing stock should be interrogated, prior to the approval of further urban sprawl. The UK trialled a 'bedroom tax' to encourage elderly homeowners to downsize or consider alternative uses for their spare rooms. While this wasn't received well by many homeowners, it did force homeowners to consider their options sooner. If backed up with support or buy-out services, a version of the policies mentioned could be used to to help optimise existing housing stock here in Aotearoa New Zealand.
		61	8	Child Poverty Action Group	The housing choices currently available are largely limited to larger expensive family homes that today's families can not afford. Where are the shared ownership homes? Smaller units and shared co-housing options etc do not feature. Restrictive contracts and covenants seem to stipulate minimum sizes too larger than many require and require complex rooflines and shapes and garages and do not allow factory produced homes etc, this all leads to expensive construction that is not affordable for many.
		75	6	Andrews, Julie	I understand there is about \$50M that will come from sale of the Pitau Road Village, and that this could be used for elder housing straight away. The Abbeyfield development in Katikati seems to be an excellent example of how community building can be at the heart of a development and suited to an ageing population who cannot afford home ownership. <ul style="list-style-type: none"> • I understand that purpose-built long-term rental accommodation is common in Europe and that there is interest in Europe in investing in this kind of accommodation in NZ. • As homelessness increases and options to relocate decrease, we could face the same kind of issues as Queensland, where people are living in public parks because there is nowhere else for them to go. We already have a van which is not being moved on from Memorial Park, presumably for this same reason. Auckland's city mission seems a great initiative. • In regard to an immigrant workforce, I don't know if there are projections about numbers or the sectors in which they will be employed, but I gather there will be a significant number of kiwifruit workers. I have read TPEDG's submission and the fact that there is already demand for worker accommodation in the Eastern Corridor. This will presumably increase with an influx of immigrant workers. I support TPEDG's calls for building homes in the east as a priority. It makes sense to give this growth area priority over Tauriko. It would align with the Strategy (refer page 95, no. 3 - "accommodation for the rural workforce, including seasonal workers, is provided close to jobs and with good access to essential services."). As is pointed out in the TPEDG's submission, not only do communities like Te Puke, Pongakawa, Paengaroa and Maketu already have essential services, they have their own community identity and existing social infrastructure and networks. Homes will cost less than homes in Tauriko, meet the ideal of "Live Work Play", plus they have the advantage of being in close proximity to the Eastern link roading route (which was an extremely expensive piece of roading!). As an aside, an "Eastern city" has been mentioned. This could be a longer term goal.
		76	1	New Zealand Kiwifruit Growers	The SmartGrowth strategy alludes to the importance of securing accommodation for seasonal workers near their job locations and essential services (page 95). However, specifics on how this will be realised are lacking. It is important that the strategy not only recognises the need for housing these workers but also the broader implications for their well-being, productivity, and the overall prosperity of the region. We appreciate that preserving highly productive land is vital but coupled with the current restrictions on RSEs living in residential homes and the potential community isolation for RSE's due to on-orchard housing, it raises the questions about what solutions and opportunities are available? As the scheme is set to expand, this complex issue necessitates engagement with industry stakeholders, ensuring that the voices of RSE workers are also heard. NZKGI is ready to actively participate in these important discussions.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		77	3	Socialink	<p>(Transformational Direction 1 Homes for Everyone, Chapter 7). 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.</p> <ul style="list-style-type: none"> • 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). <p>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.</p>
		91	26	Sustainable Bop Trust	<p>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.)</p>
		91	27	Sustainable Bop Trust	<p>20. How will this Strategy realistically result in affordable housing? 21. How much affordable housing is anticipated and how is "affordable" defined?</p>
		93	2	Ralph, Christine	<p>I. Provide fiscal support through shared equity schemes and joint venture affordable housing developments and /or exemplar projects. 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 comes 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.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		93	4	Ralph, Christine	2. In the Part 4 ,to provide a breakdown of the target housing supply by location that has to be met for rental and ownership by household size (traditionally the number of bedrooms) and price point. I attach for your information a copy of housing assessment criteria that HAF provided to UFTI in February 2020 which gives you some idea of the breakdown required and anticipated.
		93	5	Ralph, Christine	3. To make it clear in the Strategy document that the adopted Housing Action Plan actions have been absorbed into the Housing Systems Plan.
		93	6	Ralph, Christine	4. Create a forum for monitoring the Housing Systems Plan similar to the Transport Systems Plan Partner Management Group and an associated Governance Group. There must be regular monitoring and accountability of the Council's actions in facilitating a range of housing types, tenures and price points within all growth areas and Maori land. Housing is as crucial as transportation to the sustainable development of our region so treat it with the same vigour.
7: Social Community Housing		26	0	Nicholson, Scott Weston	Mobilisation of Central Government Support: The central government plays a crucial role in addressing homelessness with their offerings like emergency housing, transitional arrangements, and social housing. Priority should be given to collaborating with local entities, including councils and iwi, and adopting a community-centric approach to significantly alleviate housing challenges. The Affordable Housing Fund and the Housing Infrastructure Fund exist to bolster affordable housing and facilitate infrastructure development.
		61	2	Child Poverty Action Group	Social Housing: CPAG has suggested that nationally we need to increase the number of State Owned Units from 3.2% to 4% by 2030 and 5% by 2040. The Strategy describes the current Social Housing base in WBOP as less than 2% and blames challenging economics in WBOP as the reason. Clearly this is not good enough. We need an urgent debate to find ways to fix this.
		91	26	Sustainable Bop Trust	18. Will it provide sufficient appropriate housing for our elderly and disabled residents? 19. If not, why not? (This seems one area with strong societal consensus: taking care of our elders and our most vulnerable.)
		93	1	Ralph, Christine	This Submission seeks: 1. Within the Housing Directives Part 3 and Implementation Part 4 action statements including the following (or similar): Social/ Community Housing I. Support and collaborate with central government through project grant schemes , state housing provision ,fiscal support for Community Housing projects, partnering in exemplar affordable housing projects. II. Continue to support the homeless sector initiatives . III. Continued subsidisation of development/financial contributions.
8: Maori housing		60	1	Tangata whenua collective (CTWF workshop)	<ul style="list-style-type: none"> • 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? • Maori 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 Maori are not left further behind. • We need to ensure that manuhiri are not prioritised over mana whenua. • We need affordable rentals and homes in urban areas as well as the ability to build on our whenua. • Our current population requires priority over future population.
		60	6	Tangata whenua collective (CTWF workshop)	<ul style="list-style-type: none"> • In relation to Maori land development: <ul style="list-style-type: none"> o Infrastructure is just as huge a cost as paying for a house. o Hopefully someone can fight for us and win a "no rates to pay on Maori Land and "slice down the water rates cost for Maori land dwellers. Have a Maori bank for whanau wanting or needing to build a comfortable home on their land with reasonable price infrastructure .
		72	2	Nga Potiki a Tamapahore Trust	NPaTT notes the following: <ul style="list-style-type: none"> • The focus of the cultural well-being on papakainga development on Maori land only is myopic and does not address other important issues.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		72	5	Nga Potiki a Tamapahore Trust	NPaTT agree with and support the challenge of enabling Tangata Whenua to realise values and aspiration for their whenua and state further: • Development of Maori land is also hampered by zoning rules and other regulations that do not reflect the needs or aspirations of Maori. Adopt the challenge as notified.
		86	2	Ngai Tukairangi Hapu Trust	01. Areas to be protected and developed carefully 1A. Maori communities Development of Maori land blocks have too many barriers such as lack of infrastructure, funding, and ability to develop land. For example, access to power, water, roading etc. 1A(1). Needs improvement OR support. Provide opportunities for Maori communities to be able to develop land in a way that suits the needs of tangata whenua. 1A(1). Needs improvement OR support. Provide opportunities for Maori communities to be able to develop land in a way that suits the needs of tangata whenua.
		87	8	Ngai Tukairangi Trust	How can we manage growth and provide for houses for others, when we can't currently and adequately provide homes for our own? - Increasing the supply of housing/rentals is good but it needs to cater for the range of needs, especially lower income households. - The SmartGrowth Startegy needs to ensure that Maori are not left further behind. - We need to ensure that manuhiri are not prioritised over mana whenua. - We need affordable rentals and homes in urban areas as well as the ability to build on our whenua.
9: Intensification		3	0	Wansbrough, Nathan James	There should be incentives for building higher density housing in the main centres. More residents in the city centre would lead to more people using alternative forms of transport. "
		10	2	Underwood, Ruth	For denser 'brown fields' development, the challenge is not unduly infringing on existing neighbours so need attention to height, daylighting etc
		19	4	Lee, Jared	Housing - stop going out and start going up.
		42	12	Gordon, Carole	This fact is a glaring aspect of our national history reflected in Flaxmere, Porirua and Mangere. The serious nature of this negative outcome position (p137) particularly on future and ageing generations, is such that we should seriously consider limiting the scope of greenfield land development and give immediate priority focus to planned quality intensification of Te Papa and other brownfield existing areas. A query currently posed by the World Economic Forum is relevant. "Underpinning prosperity with economic growth has been a recurrent feature of the modern world, but the complexities of global issues are beginning to challenge these long-held assumptions. What does economic growth really mean in the current context and what kind of growth should we be striving for?"
		42	14	Gordon, Carole	3.1 Pause green field development and give priority focus to 'age- ready' age-friendly intensification of Te Papa and areas currently planned for intensification.
		50	1	Lucas, David Thomas	There is nothing smart about putting intensive housing in the Bay. For a population density in New Zealand it is 20 per square kilometre. England is 434. Why are we insisting on putting people closer and closer together causing more stress. Don't we have enough mental health issues already. Labours Phil Twyford, started the ball rolling when he convinced, or told the Bay councils to go up and intensify. One only has to look at what's happened in Auckland as an ex ample. With all the infilling of ugly 3 story or more boxes, just SHOCKING. Surely we have enough land available here in NZ to not have to do this. There does seem to be a lot of emphasis on producing homes for Maoris. As I believe we supposedly live in a multi cultural society, aren't all the many races who live here as deserving of a home to live in. Not sure whether you realize we have a new government. One of their policies will be to look at peoples needs, not based on their ethnicity when it comes to housing, health or such like. Makes sense to me!.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		53	23	Bowden, Beth Willard	There is also an important community discussion still to be had about the nature of intensification itself and the range of housing typologies needed for our 15-minute neighbourhoods. I support the priority given to the issue, but there are few apparent pathways to resolving it. I note in passing that, as the fifth biggest city in New Zealand, located on the fourth smallest land area, some form of intensification seems already to have taken place. It is also unclear whether the proposed TCC Plan Change 33 has been assumed as part of the Strategy or, if not, what its impact would be if it were to go through.
		74	4	Waste Management Nz Ltd	housing directives including direction to support and realise tangata whenua aspirations for Maori land and papakainga development in urban areas, as well as increase the public housing supply to proactively support the delivery of social and affordable housing in existing urban areas. Waste Management's submission in this regard is focused on ensuring intensified residential and other sensitive activities are developed in appropriate areas, in order to promote community health and wellbeing and mitigate reverse sensitivity effects (where relevant) on nearby existing industrial activities in close proximity to areas proposed for intensification.
		75	7	Andrews, Julie	I am in favour of intensification over sprawl because of carbon reduction and environmental factors.
		91	14	Sustainable Bop Trust	Will intensification mostly be 2-3 story townhouses, or 4-6-8 story apartments? The dots on the map seem to indicate 4-8 stories, but is that realistic?

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Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-09: Three waters and other infrastructure	1: 3 waters reform	12	2	N/A, Haley	Do not agree AT ALL to this treasurous 3 water idea!
		19	6	Lee, Jared	Three Waters etc - Waste of money and time and undemocratic
		50	3	Lucas, David Thomas	Totally against 3 waters, or 10 waters, or affordable water, whatever, take your pick. Before we waste any more taxpayers money on this, it should go back to the councils for discussion with the community. We the rate payers have payed for it, and should be listened too but it seems that we don't count. As one of the rate payers who pay a extra ordinary amount each year, we should have the option to, HAVE A SAY and to be listened too. but it seems, in my experience, that even when we have overwhelming support against some policies such as the 3 waters or Maori wards, they are still passed. Both un democratic, shame on you. As our esteem Mayor said so arrogantly. This is about making the right decision not the popular one. I rest my case.
	2: Oppose	6	5	N/A, Linda	NO
		19	3	Lee, Jared	No
		37	2	Lois	No
		54	9	Robson, John	No
	3: Water supply analysis	53	17	Bowden, Beth Willard	I am personally dismayed that the reforms proposed by the previous government foundered so comprehensively. As a resident of Western Bay, I feel fortunately situated and confident in a high-quality, relatively low-cost reticulated water supply system. But I am conscious of Tauranga City's dependence on Western Bay's water and feel we have lost years of valuable planning time. • What investigations or analysis have been done to establish whether there is, in fact, enough water for 400,000 people?
		75	14	Andrews, Julie	Another consideration is the extent to which we are limited by resources. My understanding is that the water supply will put a cap on growth. (I see water availability is noted as a factor to be taken into account on page 28 but there is no analysis of what this might mean in specific terms.)
		76	6	New Zealand Kiwifruit Growers	Many kiwifruit growers in the sub-region currently rely on an adequate supply of water for irrigation and frost protection. The demand for water is likely to increase with climate change. NZKGI has recently provided comments on Bay of Plenty Regional Council's Freshwater Management Unit (FMU) stories. The proposed minimum flows in rivers and streams will create new challenges in terms of reliability of water supply when river levels fall during dry weather. Water storage and water efficiency measures will become more important for everyone to achieve climate change resilience. Some growers have already switched from taking surface water to taking groundwater to ensure a more reliable supply and others are likely to follow.
		76	7	New Zealand Kiwifruit Growers	The infrastructure needed to support development in the sub-region, including the need for new bores to cater for expected growth is discussed in Appendix 1 of the Smartgrowth Strategy. It is unclear whether the surface water and groundwater allocation maps produced by BOPRC currently provide for these new water takes. In addition, it is unclear whether the long-term water needs associated with new future areas of housing and industrial land are included in the allocation maps.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		86	12	Ngai Tukairangi Hapu Trust	<p>9B. Water systems and infrastructure: The thoughtful consideration given to power grid infrastructure is equally applicable to our water systems and existing water infrastructures within Matapihi. It is our understanding that Whareroa is able to access town water supply.9E(1). The pressing question emerges: are the current water infrastructures robust enough to accommodate the envisioned growth associated with future papa kainga developments for our whanau? Alternatively, is it imperative for the SGS to support Matapihi in enhanced and more advanced water infrastructures to effectively cater to this anticipated expansion? This would entail the implementation of improved water treatment and distribution technologies, expanding the capacity of existing systems, and adopting sustainable water management practices. Moreover, integrating innovative solutions such as rainwater harvesting, greywater recycling, and efficient irrigation systems can contribute significantly to water conservation and sustainable usage within the community. These practices align with our commitment to kaitiakitanga and the preservation of our wai maori.</p>
		91	4	Sustainable Bop Trust	<p>We note that TCC's Plan Change 33 information showed its 25% and 50% intensification scenarios result in increased water infrastructure capital expenditure compared to the baseline of mostly new greenfield provision. That seems to go against the findings of other NZ cities (and international experience) that indicates higher-density intensification is cheaper overall.</p> <p>This is a key issue. The overall long-term cost of intensification v greenfield developments needs to be fully understood by councils and by local communities, in order to make informed, sustainable decisions.</p>
		91	20	Sustainable Bop Trust	<p>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?</p>
4: Electricity generation and supply		71	2	Zespri International Limited	<p>4.2 Significant investment is required to our region's infrastructure and we need more electricity generation transmission to meet demand growth, particularly as industries look to transition away from fossil fuels and towards electrification, creating a greater dependence on the national electricity supply. The national electricity grid will not meet the estimated 68 percent increase in electricity demand out to 20502. Business NZ called for investment in energy infrastructure to achieve decarbonisation goals.</p> <p>4.3 According to a 2023 Transpower report, achieving "accelerated electrification" by 2035 will require 40 new grid connected generation projects, 30 connections to accommodate increased electricity demand, 10-15 new transmission interconnections and other network investments4.</p> <p>4.4 Transpower highlighted Bay of Plenty is at risk of circuit overload from winter 2027. Generation capacity in the Bay of Plenty region is low compared to demand, with almost all our energy supply imported over the Kaimai ranges. It has identified that even if the Kaimai transmission to Tauranga was used at full capacity, this would exceed the ability of the lines to deliver it around the region.</p> <p>4.5 Infrastructure investment underpins business confidence to invest - our postharvest suppliers need to know the electricity infrastructure and supply is available before they can decide to invest in new and expensive electric technologies to run the packing lines and coolstores our supply chain requires. Considering the industry has the goal of doubling volume of the next 10 years, more energy generation and transmission will be needed to deliver that.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		86	11	Ngai Tukairangi Hapu Trust	9A. Power grid infrastructure: Ngai Tukairangi firmly supports our whanau in establishing papa kainga within our respective communities at Whareroa marae and also Hungahungatoroa marae, and within the respective wider Matapihi land-blocks, recognising the cultural and familial significance of these developments. To enable our whanau to realise their vision of papa kainga on their whenua, it is essential to ensure that the appropriate infrastructure is in place to support these developments effectively. Power grids stand out as a critical infrastructure required for housing developments, including papa kainga. The pertinent question that arises is whether the current power grid system in our rohe has the capacity to accommodate future papa kainga developments for our whanau. Alternatively, will our whanau require additional 9A(1). The SGS can facilitate the implementation of necessary enhancements. This might involve expanding the grid's capacity, integrating renewable energy sources, or adopting innovative smart grid technologies to ensure both efficiency and sustainability. infrastructural support in the form of an upgraded power grid to cater to the anticipated growth?
		89	3	Transpower New Zealand Limited	3.13(2)(c) any constraints on development
	5: Support	70	4	Element Imf Ltd	Element IMF also support the inclusion of the water and wastewater Critical Enabling Infrastructure requirements identified for the Western Corridor in the FDS (Table 1, page 152), including: <ul style="list-style-type: none"> • Tauriko West Enabling Works - Wastewater and Water Supply • Western Corridor Wastewater Strategy Implementation - Stages 1&2 - Tauriko West/Lower Belk/Keenan Road; Stages 3&4 - Upper Belk/Merrick Road • Western Corridor Water Supply Strategy Implementation - Stages 1&2 - Tauriko West/Lower Belk/Keenan Road; Stages 3&4 - Upper Belk/Merrick Road Notwithstanding the above comments regarding the timing of the Tauriko Network Connections (Stage 4) - SH29 and 29A improvements, all of the "Road Network", "Wastewater" and "Water Supply" infrastructure improvements for the Western Corridor outlined in Appendix A of the Strategy (page 173) are otherwise supported.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-08: Transport	1: Oppose	6	2	N/A, Linda	NO
		8	2	Goodall, Andrew David	no
		11	1	Clarke, Simeon	Too much emphasis on cycleways and not enough on expanding capacity for private vehicles (electric or not) which is what improves our quality of life.
		12	1	N/A, Haley	Focus more on infrastructure & roading solutions!
		15	2	Kenyon-Slade, M	Our population is simply far too small and spread out by waterways for public bus and transportation to be used to any great deal. A million population number is a minimum threshold worldwide. It is for Priority One to convey and reinforce this simple message to these airy fairy Labour led Government planners. In my and many business people and logical thinking publics opinion.
		19	2	Lee, Jared	No
		19	5	Lee, Jared	Transport - if you stop going out and start going up you will lower your carbon footprint and reduce day to day CO2 output
		30	1	Wallen, Bruce	The concept of all road transport going through a single area (or hub) in the city centre then spoking back out to individual isolated centres is flawed as it will only take one road to be blocked or broken (as from earthquake, flood, or road accident) and the 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 and new roads now rather than wait until required, that will drive population spread and density as once corridors are defined on maps and plans people and business will look further ahead.
		39	9	Bennett, Pauline	The highway as the rapid transport passage - because Tauranga is a port city therefore priority should be for Port transport. Government and Port funded not rate payer debt burden funded. Cameron road should not be the rapid transport passage.
		45	1	Liddell, Alan Alexander	No

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		45	2	Liddell, Alan Alexander	<p>Yes. Why do you not provide a fast, frequent, reliable, safe, rainproof, easy-to-pay-for and consistent public transport service BEFORE(!) you accelerate your policy of making things more difficult for cars and thereby destroying CBD businesses? We can't afford rail, either underground or overground, so get rid of the big empty busses except at peak periods and use electric minibuses, possibly hybrids. At peak periods, use the big busses towards the inner city and move the minis to the suburbs and use them as morning feeders or afternoon takers for the big busses.</p> <p>Stop blocking Cameron Road and its adjoining streets. Reduce the width of cycle lanes or remove them altogether. There is far too much space provided for a very few bikes and scooters. Provide good parking buildings instead of reducing parking spaces.</p> <p>Incentivise use of new mini buses by using congestion charges in the CBD excluding roads that by-pass the CBD like Takutimu Drive.</p> <p>All this should be obvious. I used to come into town from Bethlehem for lunch or breakfast regularly. Now I never do. I used to eat at downtown restaurants. Even though parking at night is easy, I am more likely now to go a restaurant at the Mount or here in Bethlehem as the Council is killing the central city and it is becoming less safe. I only now come to the CBD to attend my gym in 1st Avenue and, because I am already there, to shop at PaknSave and clear my PO box in 6th Av. Were it not for the gym (which I attend for the trainer there, not because of the location), I would switch my PO box address to Bethlehem, attend Aspire gym at Bethlehem and shop at PaknSave at the Lakes. The parking is better at the Lakes, anyway. I do not want to speak to this as I think I would be wasting my time but you asked for transport feedback and I have the time to type a rant.</p>
		53	8	Bowden, Beth Willard	<p>This chapter of the Strategy offers only an inferential connection with housing (and settlement patterns in general). This should be remedied - the two are closely integrated.</p> <p>I choose to read the four key challenges as being of equal, not sequential, importance but I note that the Climate Resilience chapter (at p.68) makes it clear that transportation is the major factor if serious GHG emissions reduction is intended.</p>
		54	8	Robson, John	No
		70	2	Element Imf Ltd	<p>To enable the development of TBE Stage 4 (in the short term) and the Upper Belk Road growth area (in the longer term), provision of infrastructure servicing and transportation linkages is critical. In our view the Strategy appropriately identifies the challenges and growth directives surrounding three waters and other infrastructure (within Chapter 09). However, for the growth directives for transport there should be emphasis placed on providing for freight movements to and from the sub-region's key industrial nodes, such as TBE, and not just the Port of Tauranga. As such the following additional wording is proposed for transport growth directive number 7 (within Chapter 08):</p> <p>7. An efficient freight network is enabled to support movement to the Port of Tauranga and key industrial nodes, and contribute to local and wider economic wellbeing.</p>
		75	11	Andrews, Julie	<p>I am in support of the aspirations of the Strategy, particularly those I have listed below* - my comments are in italics. However, I'm not at all clear about the public transport plan and how the aspirations will translate into reality. UFTI/Connected Centres does not seem to fit with the Strategy's aspirations.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		75	16	Andrews, Julie	At the moment, the premise is that creating a "spine" along Cameron Road from the Western Corridor is the most effective way of transporting people to where they need to go, that it will increase the use of public transport and reduce carbon emissions. According to the Strategy, 70% of jobs may be along that corridor. However, getting along the corridor will be impeded by 28 sets of traffic lights so would commuters not just take Takitimu Drive instead? And of course work is not the only reason people travel around town or to the Mount or outer suburbs. We have a good indication from Waka Kotahi data (using the commuter.waka.app) about the extent to which people move across and around the city, for example to: <ul style="list-style-type: none"> • 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).
		91	21	Sustainable Bop Trust	11. Why is there nothing in this Strategy to show what the TSP Public Transport Plan looks like at a practical level and how it will be implemented?
	2: Support	3	3	Wansbrough, Nathan James	Yes
		10	4	Underwood, Ruth	Yes.
		18	1	Ingram, Christopher	Here's an extra concept to manage Mount parking problems, traffic, free up Mount business district
		22	2	Van De Weyer, Callum	Yes
		33	3	Sanderson, Nathan John	Potential bulk transport options: Sea Ferry - unreliable with weather and tides Buses - increase infrastructure to create fast bus links? Short term... Train - All have current rail access. Will need to be upgraded to be dual lane as must be a fast service to encourage users. Developers bid for Train stations and can develop around them.... Long term... Select and commit now, invest heavily to create the future we need.
		55	10	Holyoake, Peter	I believe the elements of the needed transport plan are contained in the Strategy document, however the need for improved infrastructure is evident now and I would strongly advocate that the infrastructure improvements receives the higher priority:

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		55	6	Holyoake, Peter	In general, yes. The present areas of congestion and the need for improved infrastructure are both recognised in the Strategy document. The need for enhanced infrastructure is now, preferably before new development areas.
		59	12	Ministry Of Education	The Ministry is supportive of the approach outlined in the transport chapter which would support access to local social and economic opportunities within a 15-minute walk or bike ride, and sub-regional social and economic opportunities within 30-45 minutes. A programme to create high frequency public transport routes and an integrated and connected strategic walking and cycling network is supported. It will be important to ensure that provision is made for public transport, walking and cycling early in the development of greenfield growth areas in order to ensure that new residents are able to access these transport modes. Relief sought: - Retain as notified.
		71	3	Zespri International Limited	Roads
		86	8	Ngai Tukairangi Hapu Trust	8A. Promoting sustainable transportation: Ngai Tukairangi hapu stands firmly behind the SGS's initiative to curb private vehicle reliance by promoting alternative transportation methods. Recognising that Tauranga boasts the highest private vehicle usage rates in the country, coupled with the lowest public transport adoption, underscores the urgency of this endeavour. We are acutely aware of the detrimental impact vehicles have on air quality and carbon emissions. We wholeheartedly commend the SGS's proactive measures in navigating this challenge, all for the greater good of our environment.
	3: Multimodal	3	0	Wansbrough, Nathan James	Acknowledgement and thanks was given to the SmartGrowth Plan itself, including the change of focus to public transport, walking, and cycling. The work currently being undertaken on Cameron Road to provide for multimodal means of transport, including the consideration of having bus stops that do not affect the traffic flow. As the SmartGrowth Strategy was looking at the next 50 years, Mr Wansbrough felt it was important to consider additional rail, dedicated bus infrastructure (tunnels and bridges).
		10	5	Underwood, Ruth	Need a lot to happen here to make it easier to use public transport. Short term all road projects need to include walking, cycling, bus-lane, 'park and ride' features. There are good things happening, but it is a real catch-up. I'm keen on a 'buses on the train track' dual rail/wheels system like the repair trucks that drive on the railway now. That would work for transport from Te Puke and Omokoroa over the longer term. What about a (free?) 'park and ride' from Baywave to Tauranga - frequent buses using the 2 bus lanes already in place, security-focussed parking ... get Bayfair to sponsor it? Park and ride somewhere around Totara Street for the beach visits over January or for those driving into the area to accommodation with inadequate parking and clogging up the Mount beach front, Pilot Bay and on-street parking, with 15 minute drop-off zones for people to unpack ... Some of these things could be trialed quite simply. Congestion charging is tricky - congestion is its' own 'punishment' - so does influence travel and transport already.
		16	1	Firth, Heather Doreen	Instead of parking and public transport problems at the Mount, we could have electric tuktuks on a circuit, so that people could park far away and easily ride to the shops and amenities

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		18	2	Ingram, Christopher	Re Park and Ride concept. a) free /low cost parking adjacent BayPark/Mercury stadium.location b) 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.
		27	2	N/A, Richard	Building roads will move congestion from one place to another. For every person that is able to catch a bus or use a bike, there is more room for those who can't and for delivery vehicles. Planning needs to include all modes of transport and park and ride. Park your bike and ride. All those things that stop people from using alternative transport need to be addressed. Move away from a car centric way of thinking. The electric car is not the answer, instead we need to get people out into their community sharing their commute and getting to know each other. What about passenger rail? Especially as an inter regional mode of transport.
		30	3	Wallen, Bruce	Be bold in procuring sites for future infrastructure now and ignore the startup implications of cost and complaint. Learn from history. Auckland wanted commuter trains in 1960 championed by 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...
		35	2	Low, Jason	A commuter train from the CBD to the mount to tepuke
		38	2	Smith, Michael Geoffrey	I am concerned no real planning on passenger rail as a solution to clean, efficient and viable transport in the region and outside the region Hamilton - Auckland. The rail network is already in place - we should be using it. I understand to fully upgrade to the required level for all North Island is around \$3b so BOP being the fastest growing region, etc. Passenger Rail should be high Priority One priority.
		39	11	Bennett, Pauline	Consideration should be given to making Cameron Road and Frazer Street one way streets. Electric Commuter Trains/trams Government funded - for fast efficient inter community connections. Taking cars and buses off the roads
		39	12	Bennett, Pauline	Bus Hubs - Full service Bus Hubs at all major community connections You can not propose intergenerational debt with an ageing population
		39	6	Bennett, Pauline	Transport: Electric Commuter Trains/trams Government funded - for fast efficient inter community connections. Taking cars and buses off the roads. Government must lead development with Smart Sustainable Plans not developers. Incentives can lead to development in the right way and the right place (within the current urban areas). Bus Hubs - Full service Bus Hubs at all major community connections You can not propose intergenerational debt with an ageing population

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		40	4	Buhrs, Nicole	<p>Transport:</p> <p>This goes together with housing. To reduce the number of cars on the road I don't think that a price tax will be the solution. It will again put an extra burden on already struggling families. Public transport needs to be put into place before starting intensifying areas and developing new ones.</p> <p>What about encouraging people to carpool when they go to the same place/event at the same time? What about having a separate lane for cars that carry more than one person (T2 or T3 like in Auckland)? What about creating a network of connected cycle lanes physically separated from roads? What about a frequent and reliable bus system (like every 10 min) during rush hour? What about a minivan public transport door to door service outside rush hour - like they are trialling in Tawa and Timaru? What about free buses for school children going to school? What about express commuter buses? What about using the rail in suburbs where the train goes through (like Omokoroa to Te Puke for example). What about making use of ferries?</p>
		41	4	Mollison, Margaret Helen	<p>Public transportation, as one of the key ways of reducing carbon output in our city, needs to be planned and executed now before full intensification takes place. This needs to include walkways, bikeways, dedicated bus lanes, possibly ferry services, trains and trams - or at least the future possibility of these - with an integrated and safe framework so that people can move easily without the need for cars. Cities such as Melbourne and Sydney which set out their public transport systems 150 years ago show us that good planning has become a vital part of a functioning modern city, which helps improve sustainability and quality of life for all.</p>
		45	3	Liddell, Alan Alexander	<p>Yes. Why do you not provide a fast, frequent, reliable, safe, rainproof, easy-to-pay-for and consistent public transport service BEFORE(!) you accelerate your policy of making things more difficult for cars and thereby destroying CBD businesses? We can't afford rail, either underground or overground, so get rid of the big empty busses except at peak periods and use electric minibuses, possibly hybrids. At peak periods, use the big busses towards the inner city and move the minis to the suburbs and use them as morning feeders or afternoon takers for the big busses.</p> <p>Stop blocking Cameron Road and its adjoining streets. Reduce the width of cycle lanes or remove them altogether. There is far too much space provided for a very few bikes and scooters. Provide good parking buildings instead of reducing parking spaces. 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.</p>
		47	6	Fitter, Julian Richmond	<p>You talk about sustainability and effectiveness, and yet there is nothing in the plan that suggests you have any idea how to solve the transport issue in the region. If the population of the region is set to double and most of that growth is outside the Tauranga urban area, then quite clearly you need to build in an effective and efficient transport system.</p> <p>That does not mean more cars as there is already no room for them. That must mean developing an effective public transport system:</p> <ol style="list-style-type: none"> 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
		53	11	Bowden, Beth Willard	<p>How is it that implications for rapid transit afforded by the TEL and TNL, supplemented by local shuttles and park-and-ride options along rural highways, are not incorporated in the Strategy?</p>
		53	9	Bowden, Beth Willard	<p>I regret the emphasis on roading and wheeled vehicles and the absence of any consideration of rail and water-based transportation options. That said: Are private vehicles to be the only means of connection between our Connected Centres?</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		55	8	Holyoake, Peter	<p>2. Alternatives to private transport: 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.</p>
		75	10	Andrews, Julie	<p>There are questions around what is not addressed in the Strategy. When I was involved in a survey about UFTI a few years ago, most people we asked about transport networks said they favoured rail. Although this has been considered too expensive in the past, with the growing population of sub-region and the rapid development of technology and AI, there may be ideas that are worth investigating (certainly this is the approach that Wayne Brown is taking). I would have thought we should be at least be planning for an interconnected rapid transit system which would entail identifying and securing land for that purpose before the land gets sold/built out. To give an example, I understand that a rail service from Omokoroa could have been a good option but the land which would have been suitable for a railway station in Omokoroa has recently been sold. Park n Rides are to form part of the network but I can only see them mentioned in the Strategy at Domain Road, Wairakei, Omokoroa and Te Puna. We need to provide for others which are closer in, eg at Baypark. Similarly, there could be more on-demand PT trials, including Maungatapu (where I live!) which is ideally suited to the concept because of the long peninsula. I am in support of the aspirations of the Strategy, particularly those I have listed below* - my comments are in italics. However, I'm not at all clear about the public transport plan and how the aspirations will translate into reality. UFTI/Connected Centres does do not seem to fit with the Strategy's aspirations.</p>
		75	12	Andrews, Julie	<p>Aspirations from Startgey:</p> <ul style="list-style-type: none"> • 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 Pa) • 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.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		86	10	Ngai Tukairangi Hapu Trust	<p>8C. Matapihi shared pathway: The issue of cycling safety within Matapihi, as outlined in our Hapu Management Plan, is also of concern. Currently, the absence of a separate cycleway within Matapihi necessitates the use of shared pathways with pedestrians. This shared pathway, serving as the primary route from the Bayfair area to Te Papa, is heavily utilised by cyclists commuting to and from 8C(1). Critical considerations must be made regarding the adequacy of the shared pathway. This assessment includes evaluating the availability of sufficient lighting to ensure the safety of cyclists, especially during low-light conditions. Moreover, the congestion on the pathway sometimes compels cyclists to use the road, posing hazards both to them and to vehicles. This situation necessitates urgent work. However, the question arises: is the existing shared pathway adequate to accommodate the volume of traffic it sustains?measures to guarantee the safety of all individuals using these routes.</p> <p>To address these challenges, comprehensive strategies through the SGS must be implemented. This includes the installation of adequate lighting along the shared pathway, enhancing visibility and ensuring safe passage for cyclists during darker hours. Moreover, exploring options for widening the pathway can help alleviate congestion and reduce the temptation for cyclists to use the road.</p>
		91	22	Sustainable Bop Trust	12. Why are park 'n rides still a side issue? (i.e. not enough of them planned)
	4: Road Improvements	12	4	N/A, Haley	Make the harini bridge link into the city 4 lanes because half of the bop uses that route- its a no brainer that should have been done years ago!!
		50	2	Lucas, David Thomas	There seems to be no mention of upgrading the SH2 intersection before increasing the housing in Omokoroa. With more housing, obviously comes more traffic. and more frustration. A Sensible reduction in building further housing would be a good start. Lets get the infrastructure right first. But you know this.!
		55	7	Holyoake, Peter	<p>1. Road development priority: CONCERN: Existing major commuter routes, which will serve the Tauranga Western Corridor development areas, are already congested by existing traffic: a). Cambridge Road joining SH29 - especially in the morning b). SH29 to Tauranga Crossing - in the morning c). Tauranga Crossing to the SH29 junction with Cambridge Road - in the afternoon / evening d). Tauranga Crossing to Pyes Pa along SH29. Further development in the Western Corridor will encourage traffic in the Tauriko and Pyes Pa areas and will add to this congestion UNLESS alternative routes are made available FIRST. RECOMMENDATION: Prioritise the construction of a direct link from SH29 into the Tauriko Industrial Estate (Gargan Road, as an example, may have been a direct link, if it was large enough with good access / egress from SH29). This will reduce congestion at a, b and c above.</p>
		63	2	Landsdale Development Ltd	There is a existing, known capacity issue along SH29A as such any funding and acceleration of the upgrade of this corridor is beneficial to the wider area.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		70	3	Element Imf Ltd	<p>Updating the directive as above would provide support at a policy level for a number of the "Critical Enabling Infrastructure" transport requirements identified for the Western Corridor in the FDS (Table 1, page 152), which Element IMF support, including:</p> <ul style="list-style-type: none"> • 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) <p>Further to the above, Element IMF likewise supports the footnote to the FDS Western Corridor "Critical Enabling Infrastructure" table, which outlines:</p> <p>"SmartGrowth partners have agreed there is a strong preference and need for Western Corridor transport improvements to be delivered in a single stage within a decade (by 2034) as opposed to the proposed staged delivery over many years potentially extending until 2050 given the significance of the corridor locally and nationally."</p> <p>Given this, we seek that the timeframe for delivery of the Tauriko Network Connections (Stage 4) - SH29 and 29A improvements be identified as "medium" rather than "long" to align with the 2034 timing horizon.</p>
		71	4	Zespri International Limited	<p>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.</p>
		71	6	Zespri International Limited	<p>Mount Maunganui Industrial Area</p> <p>5.6 Hewletts/Hull/Totara is a key access point in Mount Maunganui, linking the port, airport, and Tauranga suburbs, as well as being a highly valuable and productive industrial area. This access point is at capacity, severely affecting access to work and stunting productivity.</p> <p>5.7 For context, the kiwifruit industry expect to see 300 daily truck trips to and from the Port of Tauranga during the peak of the 2024 season. This number will increase as more orchards come into production.</p>
		80	1	Hickson, Paul	<ol style="list-style-type: none"> 1. Road congestion is impeding economic growth and costing existing business and resident money through traffic delays and slow travel to work. E.g. Tauranga Harbour Bridge/Hewletts Road. 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 Kaituna River would be a costly exercise for the kiwifruit industry harvesting with the alternate route being via Hamurana/Pyes Pa. 4. With the continuing population growth it is important the roading network keeps safe. 5. I would support tolling on specific routes and where a linked network is established would support cross subsidy id an economic benefit could be argued. <p>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 fixed Kaituna problem.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		81	14	Urban Task Force	It is important that the strategy identifies the need for regional cooperation, particularly in relation to the need for freight links (with State Highway 29 being located both within the Waikato and Bay of Plenty regions) and the role of the Port of Tauranga in New Zealand's future. Freight volumes will only grow as the Auckland Port closes. The Port of Napier is relatively disconnected and the Port of Whangarei is geographically isolated. Freight volumes will continue to expand as will the demand for local industrial land associated with import/export and port related activities.
		86	9	Ngai Tukairangi Hapu Trust	<p>8B. Traffic/road improvement projects: The rapid growth of the Bay of Plenty region necessitates constant upgrades to its roading and traffic systems, particularly in the bustling Mount Maunganui and Arataki area. The recently initiated Hewletts Rd flyover project is a case in point. While these major roading projects aim to alleviate congestion, they have a direct impact on the day-to-day traffic flow in Matapihi. The community of Matapihi faces a unique challenge due to its singular entry and exit point, linking up to a major roundabout.</p> <p>We are steadfastly against the imposition of carpark meters in the Mount Maunganui area. The devastating impact of parking charges is evident in the Tauranga CBD, and we oppose their imposition in our other rohe. In addition, we are concerned with the overzealous impact of multiply user interests on our roadways, including cyclists, buses, traffic, parking and so forth. The impact is messy, and devastating for businesses.</p> <p>8B(1). This situation highlights a pressing concern regarding traffic flow within Matapihi. Given the community's singular route in and out, it is imperative that the Matapihi community's needs and concerns be prioritised in the Council's considerations during discussions surrounding such roading projects. The impact of these projects on our daily lives, accessibility, and overall well-being cannot be overstated. Consequently, it is essential for Council's to continue to actively engage with the hapu and the Matapihi community, seeking our input and feedback to ensure that any roading developments align with our community's requirements.</p>
	5: Port of Tauranga Infrastructure upgrade	71	10	Zespri International Limited	<p>5.17 NZCCO, of which Zespri is a member, commissioned an independent report anticipating how the cargo and logistics sector will transform in response to government policy and the impact of COVID-19. Key findings were released in September including:</p> <ul style="list-style-type: none"> • 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 <p>5.18 We also note this aligns with Business NZ's call for Te Waihanga/Infrastructure Commission mandate to be expanded to focus on building the most creative ways possible across central government, local government and the private sector.⁸</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		71	7	Zespri International Limited	<p>5.7 Zespri requests the scope of the transport chapter to be extended to include support Port of Tauranga infrastructure upgrades, in the form of streamlined consent processes which would:</p> <ul style="list-style-type: none"> • 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. <p>5.8 With upgraded port infrastructure and the right settings in place, the size of the opportunity for our industry and New Zealand Inc is immense. Projections show the New Zealand kiwifruit supply could double volume growth compared to 2022 and double value growth by 2030 to over \$7 billion in sales.</p> <p>5.9 Zespri used 57 charter sailings last year and an additional 13,300 containers, equating to over 172 million trays (1 tray = 3.6kg) of New Zealand kiwifruit shipped to over 50 markets around the world. This amount will increase as the industry continues to grow. We estimate the use of containers to more than double by 2031.</p> <p>5.10 As it stands, the Port of Tauranga's Sulphur Point container berth requires an extension to absorb the increasing demand, where freight volume is forecasted to grow 49-61 percent over the next 10 years. The construction of the berth extension is funded by Port of Tauranga however this is facing an uncertain but long time frame due to the consent sitting with the Environment Court, posing a major risk to New Zealand's imports and exports beyond 2025.</p> <p>5.11 The Port stated in August 2023 that it will run out of space for its container operations in the next two years.</p> <p>5.12 COVID-19 highlighted the significant underinvestment in port infrastructure worldwide, with government policies in response to the pandemic disrupting supply chains and changing consumption patterns worldwide, resulting in significant disruption, uncertainty and rising costs. Together with geopolitical changes, global supply chains are changing significantly.</p> <p>5.13 There is a long-term trend toward larger vessels, driven by cost-efficiency and climate change policy factors (ie low-emissions vessels are generally larger), meaning shipping lines will want to bring larger vessels to New Zealand in future.</p> <p>5.14 Ships using alternative lower-emission fuels will require separate supporting infrastructure to bunker and refuel - all of which requires investment and consents.</p>
		81	15	Urban Task Force	<p>The Strategy should contain actions in relation to this, including a close working relationship with neighboring Councils (particularly the Waikato and Futureproof). Better/safer highways and rail for passengers and freight between the inland and coastal ports is required as an action. In relation to employment land in the eastern Corridor, industrial zoned land adjacent to the eastern railway link needs to be properly planned as a freight feeder and distributor for the Eastern BOP and Port of Tauranga, and not be excluded from a rail connection. The current line is only at 30% capacity. An action is required to enable this in the implementation and funding plan. Contributions to growth and infrastructure required from the Port of Tauranga should also be identified (particularly in relation to the provision of infrastructure and transport upgrades) in the implementation Plan.</p>
	6: Carbon emissions	91	18	Sustainable Bop Trust	<p>Why is there no solid carbon emissions analysis?</p> <p>7. Is there any evidence at all that implementing the Strategy will result in the required big reductions in carbon emissions?</p> <p>8. If not, why is that acceptable?</p>
		91	23	Sustainable Bop Trust	<p>13. Can we afford to invest in low carbon infrastructure e.g. a rapid transit network, likely to be the best way to cut transport emissions? (the carrot to go with the road pricing stick)</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		91	6	Sustainable Bop Trust	<p>Carbon Emissions</p> <p>A major concern is the lack of robust analysis around carbon emissions. We have asked for carbon emissions analysis for the Draft Strategy, the Joint Spatial Plan, Te Papa Spatial Plan, Otumoetai Spatial Plan, Mount-Aratakai Spatial Plan, UFTI, the TSP and other transport plans, the Tauriko Business Case, the Cameron Rd project, Maunganui Rd project, Civic Centre project, the Domain Stadium Business Case and several other large plans and projects.</p> <p>We have seen hardly any detailed analysis, and what little we have seen is either insufficient to assess the best spatial planning and transport options, or points us in the direction that all the options being considered are high carbon. We understand that further modelling of transport emissions is still being undertaken, but the timing is unclear.</p> <p>Embedded / embodied carbon emissions are also hugely significant in regards to transport infrastructure and other projects, such as the proposed Tauranga civic centre, and we are still not being told if those will be incorporated into any analysis and modelling.</p> <p>We are particularly vexed by comments from the City Commissioners that Cameron Rd is their key "low carbon" project and that the proposed Tauriko Highway project will "fight climate change". Both those statements are untrue. The Business Cases make it clear that both projects will increase emissions rather than cut emissions and BOP Regional Council, TCC and Waka Kotahi staff have all confirmed that. We have seen no projects that show that carbon emissions will be reduced as a result of that project. It seems abundantly clear that the proposed SmartGrowth Strategy is not a low carbon strategy. That alone should require the current process to be halted, in order to change this Draft Strategy to a low carbon strategy.</p> <p>It is 2023. The NZ government has signed up to cut carbon emissions in half by 2030. This SmartGrowth Strategy needs to reflect that reality and become a genuine low carbon strategy.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-10: Social Infrastructure and well-being	1: Oppose	6	3	N/A, Linda	NO
		42	20	Gordon, Carole	To reiterate- there is insufficient focus on planning for people. The items under this heading eg sports fields, playgrounds assume that only children and young people have active lives. Please ensure that ageism is not driving the perspective and that current adult and older people are catered for in such examples of investment. This strategy should lead a longevity wellbeing focus- we cannot afford not too. This, and generalised assumptions on the quality of urban spaces in delivery of Connected Centres is not satisfactory Please include lifelong learning and community facilities for social connectivity and creativity. Homogenised perspectives disrespect diversity and result in diminished social cohesion.
		54	10	Robson, John	No
		55	5	Holyoake, Peter	For connected centres that are not near the new Civic centre I have some comments regarding the provision of community facilities and the location of marae:: 3. SOCIAL - Community Centres CONCERN: Future residential development areas will need access to centrally-located facilities. For example, recent development areas - The Lakes and Tauriko do not have communal external AND internal spaces for community events (playground, park or reserve and community hall) in or close walking distance to their hubs. RECOMMENDATIONS: a). TCC has an excellent record of providing external Reserve space. Continue this in new developments. b). Many existing community hubs (e.g. Greerton, Matua) have schools and community halls close to each other (within easy walking distance). This facilitates parental attendance at public meetings in the late afternoon. Ensure that new development areas include a community hall. Note - if the school is close, the school hall could be shared by the local community after school hours if access arrangements were carefully designed. 4. SOCIAL - Location of Marae CONCERN: Many Marae are located away from existing hubs / connected centres. RECOMMENDATIONS: a). Many marae will need to be relocated to avoid flood risk. Consider the provision of land for the relocation marae in the new development areas.
	2: Well-being	7	3	Angela	Please consider the most vulnerable when finalising the plan - people living in poverty, with disabilities who are disadvantaged.
		42	1	Gordon, Carole	This submission offers constructive evidence-based comment in the context of rapid population ageing in the SmartGrowth sub-region, because, according to the National Academy of Science and Medicine, we need to examine longstanding ageism that builds resistance to investing in the potential opportunities of longer lives, leading to significant generational costs from inaction. The UN has declared a Decade of Healthy Ageing to combat ageism, in order to lift sustainable policy platforms that improve the lives of Elders, their families and communities. All expect to stay well, live well and contribute to their family, whanau and community. A healthy later life is crucial part of the social contract. Societies achieving healthy longevity will benefit at large scale from enhanced human, financial and social capital contributions from older people. This will improve economic societal wellbeing, as well as the success of young people.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		42	10	Gordon, Carole	It will be an easy logic to undertake social infrastructure and community amenity investment that aligns ecosystems with sustainability and age-friendly design considering a social equity and healthy longevity lens. 2.3 It is vital that hyperlocal community development is a co-design process. 2.3 Integrate community health care service delivery into the SmartGrowth strategic framework with as a transformative action. Connectivity is essential to ensure equitable access to timely care.
		42	15	Gordon, Carole	3.2 Ensure hyperlocal community development and the provision of health services is a parallel development.
		53	13	Bowden, Beth Willard	Possibly because of its emphasis on bricks and mortar, the Strategy is light on the specific necessities of supporting an ageing population as well as an increasing number of young, predominantly Maori, families within communities whose increase is largely due to migrants (both New Zealanders and elsewhere).
		69	2	Pirirakau Tribal Authority - Incorporated	Pirirakau and local community wish to retain the uniqueness of the rohe. We seek to build the essence of this as unique set apart from urbanisation. Key facilities that are missing such as retirement facilities and other necessary services can be designed and allowed for in these ways. We do not have to all fit into the growth strategy to take it all. 20. Invest into the current community facilities and amenity available offsetting from all of the wider development as financial contribution offsets.
		76	2	New Zealand Kiwifruit Growers	The SmartGrowth Strategy, while focusing on the broader community development, needs to include the integration and well-being of RSE workers, understanding their role in the BOP regions community. Key areas to focus on should include: 1. Community Integration and Cultural Understanding: Address misperceptions and incidents that may arise due to cultural misunderstandings, such as the concerns raised over RSE workers' behaviour outside Kava Bars in Te Puke. Strategies could involve educational programs, community dialogues, and cultural exchange initiatives that enhance mutual respect and understanding. 2. Engagement and Well-being Initiatives: Expand on existing employer-led engagement efforts, like the rugby match organised by Pacific Island Rugby, to include broader, structured community programs. These should focus on the well-being of RSE workers, incorporating mental and physical health support, and offering a range of social and recreational activities. 3. Customs and Celebrations Inclusion: Introduce RSE workers to local customs and involve them in regional and national festivities, thereby fostering a sense of belonging. Initiatives could include traditional powhiri welcomes, involvement in local church services, celebration of their national Independence Days, and more. 4. Collaboration with Existing Programs: While programs like "Welcoming Communities" led by Immigration NZ exist for migrants, there's a need to either expand these to include RSE workers or create new, tailored initiatives. Collaboration between local governments, businesses, and community groups is essential for the success of such programs.
		77	0	SociaLink	In 2022, via the Social Sector Forum, it was proposed that there remained a need for a social wellbeing lens on the implementation phase of SmartGrowth, to ensure risk of social wellbeing was mitigated, while enhancing the benefits of projects to impacted communities. Social Impact Assessments were a proven methodology that analysed, monitored and managed the intended and unintended social consequences (both positive and negative) of planned interventions. The proposal (which Social Link supported) recommended Social Impact Assessments be undertaken on projects that were likely to have significant risks and/or opportunities to social wellbeing, as well as monitoring the implementation of the assessments.
		91	25	Sustainable Bop Trust	16. Does the Strategy account for and meet the needs of the large and 17. increasing numbers of people with disabilities and mobility issues?

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Topic	Issue	Sub ID	Sub Point	Name	Summary
	3: Support	17	4	Pirere, Tania	Very whanau oriented maketu is that's what I love about this community both.local Pakeha and maori whanau awesome
		39	13	Bennett, Pauline	Implement Live, Work, Play - through the use of local facilities e.g. schools, tertiary education facilities, churches, halls.
		53	12	Bowden, Beth Willard	It is very difficult, as the Strategy itself demonstrates, to identify the important elements at work here and I applaud the emphasis placed on networks as well as health care and schools. It places strong emphasis on physical infrastructure and facilities and the link between these and "an established population". An unstated challenge, however, is the relationship between the dynamic demographics described throughout the Strategy and the continuing appreciation of the long-term benefits of public parks, community centres and other gathering places (whether actual or virtual).
		59	13	Ministry Of Education	<p>The Ministry is supportive of the focus within the draft Strategy on the importance of social infrastructure in supporting well-being. The Ministry supports the Strategy's focus on a network approach to the provision of social infrastructure. This acknowledges that each network of facilities functions as a whole, to provide a balance between locality, accessibility and economies of scale. The network is generally characterised by two different levels of provision; 'sub-regional/citywide' and 'local'.</p> <p>As set out in the draft Strategy, in some cases, existing schools in the Western Bay of Plenty sub-region are at or nearing capacity. This is a result of rapid population growth in specific areas and the complexity of delivering additional educational infrastructure due to funding, planning, land or other constraints. The Ministry seeks to work proactively with the Smart Growth partners to understand the timing, staging, location, type and quantum of growth to ensure the Ministry can respond.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-11: Economic wellbeing	1: Support	3	1	Wansbrough, Nathan James	Yes
		48	2	Tauranga Business Chamber	Overall, the wider business community likes certainty. While there are matters throughout this strategy that businesses would not support. On balance, and given the dire shortages of housing and employment zones, the business community would support the SmartGrowth partners to focus on delivery and providing certainty to aid business investment. We support that the focus should be less on business attraction; instead, focus on maximising employment density and advancing the innovation and R&D ecosystem to improve the productivity of our existing and natural strengths. We support SmartGrowth's recognition of how interconnected the WBOP subregion is with the upper North Island.
		84	6	Mcmaster, Bill	1.23 Chapter 11 Economic Wellbeing (pg134) - I applaud the recognition in Chapter 11 of the Western Bay being a key location in the Upper North Island freight and logistics network, especially to serve access to the Port of Tauranga, the largest port in the country. I encourage strong liaison and co-operation with Waikato and Auckland partners to ensure that transport links between Tauranga, Hamilton and Auckland, both road, rail and maritime, are enhanced. Joined up regional land transport plans are critical to the development of all three regions and will ensure best possible bids are prepared for Central Government funding for this UNI region. Mutual projects such as SH1 and SH29 improvements on the SGS Western Corridor are vital to ensure efficient transport links are achieved.
	2: Oppose	6	7	N/A, Linda	NO
		17	1	Pirere, Tania	Just leave our aera alone maketu has its own natural qualities,we don't big flash houses or over pollution only tanga whenua have the right to their takiwa.Thats Te Awara for yeah ah trying to turn our beautiful maketu in a minute rotorua save it.
		28	1	Thorpe, Andrew	Not sure
		47	10	Fitter, Julian Richmond	This has to be focussed on environmentally friendly industries, primary industries are inherently bad for the environment unless they are firmly focussed on minimising that impact. There is no evidence that this is the case.
		47	8	Fitter, Julian Richmond	Our econoic wellbeing is dependent on the wellbeing of our environment and that in turn is dependent to a large extent on our climate and that in turn will affect sea levels, a farly critical issue in the BoP. We need to be absolutely sure that all our developments are focussed on minimising environmentakl impact and CO2 emissions - I do not get any sense that that is a priority, excpet in some fine words.
		54	11	Robson, John	No
		66	8	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	GB considers that additional wording should be inserted to recognise and support existing industrial activities that provide for economic and housing growth and both a regional and national scale. Insert a new economic objective: Enable and support the continued establishment , operation and maintenance of existing industrial activities that contribution to the regional and national economy.
3: Economic assumptions	48	3	Tauranga Business Chamber	Housing is critical for the region staying economically competitive. Based on current projections, the supply and demand trend of local housing varieties is becoming a major issue for businesses (e.g. staff are asking for higher wages to keep up with rising mortgage and rental costs). Although it's out of scope, we support SmartGrowth recognising that a growing proportion of the WBOP subregion's workforce will be living in the Waikato and commuting on SH29. Travel times from Papamoa/Te Puke into Tauriko and Tauranga's city centre is currently similar to travelling from Matamata/Morrinsville - where rentals and house values are nearly half the price.	

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		53	1	Bowden, Beth Willard	<p>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.</p> <ul style="list-style-type: none"> • 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
	4: Economic growth	65	3	Te Puke Economic Development Group	<p>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.</p>
		66	12	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	<p>GB considers that support should be provided to existing local industries that have functional/operational need to locate ant the Port and which provide for construction materials that assist in housing delivery. Insert new directives as follows: 1. Support and realise tangata whenua aspirations for Maori land and papakainga development in urban areas and in the rural environment. 2. Deliver the place-based housing plan through collaboration and leadership. 3. A range of housing types, tenures and price points is provided within all growth areas and Maori land. 4. Affordable housing supply is increased and targeted to stressed households (renters - submarket and market; alternative tenures; progressive ownership; iwi). 5. Urgently reduce households being housed in unsatisfactory emergency accommodation. 6. Public housing supply is increased and aligns the typologies of new and existing housing stock to match the needs of the community. 7. Demonstrate mixed tenures and housing typologies through intensification projects. 8. Proactively support the delivery of social and affordable housing in existing urban areas and growth areas. 9. Proactively supports local industrial activities that have a functional/operational need to locate ant the Port of Tauranga 10. Proactively support local industrial activities that provide housing construction materials to assist in housing delivery both regionally and nationally.</p>
		71	8	Zespri International Limited	<p>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.</p>
		87	6	Ngai Tukairangi Trust	<p>Being involved in commercial property development can offer a number of opportunities to tangata whenua to participate in economic development, wealth creation, and the preservation of cultural sites. Maori land trusts have shown they can play a significant role in commercial property development by utilising whenua Maori and resources to generate income, support community development, and promote economic self-sufficiency. The Trust has been able to successfully do this through horticulture, but with the supply of HPL dwindling, it is imperative the Trust is looking for ways to diversify their portfolio and venture into other investments.</p> <p>The Trust would be very interested in identifying opportunities where they could invest in commercial property development that aligns with the economic needs and goals of Matapihi and our wider hapu boundaries. We would also consider how we could work with commercial property developers, working within our hapu domain, on the design principles and any potential cultural references.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		94	1	Katikati Community Board	<p>With a population of approximately 15000 residents and GDP in excess of \$2b, our contribution to the national economic effort is both important and impressive. Whilst this capability is strong the challenge is the aging population of the region. There is a need for further economic development to attract younger families and skilled employees into the region for economic well-being and social continuity. Katikati will continue to grow. "Katikati needs to renew its economic drive. Our key economic driver is the Avocado industry but kiwi fruit is important and is growing but projected to only add 17 permanent jobs over the next 5 years. The Katikati Community Board has identified 3 legs to this economic renewal – being a destination town, the Business Park and an environmental hub with a focus on eco-agriculture development. The Katikati Business Park will create more jobs and added value and the full scope of eco-agriculture will create new jobs and innovation.</p> <p>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 Katikati region must be categorised as high priority. We encourage Smart Growth to listen to and work with Business and Industry groups that bring knowledge and direct connection to economic sectors and local communities.</p> <p>Smart Growth management has detailed projections for both industry and population growth. We have developed detailed strategic plans in which we highlighted future needs and introduced them to local people with considerable local knowledge.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-12: Future development strategy	1: Oppose	6	1	N/A, Linda	NO
		8	3	Goodall, Andrew David	no
		23	1	Basher, Bill	Could be done quicker and better, not so sure about priority on down town
		33	1	Sanderson, Nathan John	Trend is Waikato where Councils want us to bring them proposals to help them. Prole road, Omokoroa - only area in district currently developable. My sister and brother-in-law are currently working here.
		44	2	Conlon, Bruce Nicholas	We have large amounts of land up welcome bay, us and our neighbours combined. Given farming is getting squeezed from many sides, there seems to be a housing opportunity here, with beautiful land and views. There looks to be works planned on roading in future, is it enough and in the right areas of connection?
		47	5	Fitter, Julian Richmond	The UFTI model suggests using Te Puke as an eastern hub, and yet the plan does not include the necessary growth there, even though it has all the required infrastructure and services and so should surely be the key area to the east.
		54	12	Robson, John	No
		61	7	Child Poverty Action Group	Greenfield urban developments; The Strategy relies on Greenfield urban developments to provide 64% of the new housing supply. We believe that repeating the current subdivision model such as we see today at Omokoroa and Papamoa East is not an option. The price of purchasing and developing land is simply not affordable and financially favours developers.
		81	9	Urban Task Force	There is a need to deliver housing and business land in a timely and efficient manner as Tauranga is now the worst performing Tier 1 Council under the NPS-UD in terms of housing supply and housing affordability. The Smartgrowth Strategy must adopt a more enabling and fluid policy position to enable the delivery of residential and employment land based on a corridor approach. Key actions are required such as the ability to efficiently deliver and service land with respect to infrastructure. Sound engineering solutions which enable land to be developed should be applied and feasibility assessments must be required to ensure that ultimately the development of land is feasible in order to deliver housing. These are all actions that require inclusion in the Strategy. The "lead time to Development" identified on page 144 of the Strategy needs actions included in the Strategy to support a reduction in the development timeframes. Much of the delay is due to poor Council Plan Change and District/Regional consent processes. The need for urgent action and collaboration implicit in the Draft Strategy is not currently translated into delivery. Further actions are needed to require Smartgrowth Partners to sufficiently resource processes, and to offer fast track Plan Change and premium consent processing services. These Actions will greatly assist with the supply of land from Priority Development Areas identified in the Strategy.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		83	7	Bell Road Limited Partnership	<p>Significance of the Future Development Strategy</p> <p>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.</p>
	2: Infrastructure Readiness	2	5	Smith-Kerr, Stephanie Heather	I don't think development should be considered until infrastructure is already in place.
		43	1	Palmer, Aimee	I think more focus needs to be put on the infrastructure that is going to support the growth of the western bay/ Tauranga area. This is evident in the likes of Hamilton where there is significant issues with infrastructure capacity which have had to have been fixed now which is more difficult than if it was addressed at first hand.
		67	5	Ford Land Holdings Pty Ltd	<p>FLH requests that the Table on page 151 be amended as follows:</p> <p>Add:</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; Medium Term, Subject to Business Case. b) Kaituna Link transport connection from the eastern end of Te Tumu to Rangiuru; Long Term. c) Te Tumu WWPS to Wairakei WWPS and Opal Drive WWPS including associated Rising Main Connections to Te Maunga WWTP; Medium Term, Subject to WSE Funding. d) Establishment of a new co-educational secondary school; Medium Term, Subject to Bus Case. e) Establishment of a new primary school; Medium Term, Subject to Business Case. <p>Amend:</p> <ul style="list-style-type: none"> a) Te Tumu Trunk Mains to read Te Tumu Water Trunk Mains.
		67	8	Ford Land Holdings Pty Ltd	<p>FLH requests that:</p> <ul style="list-style-type: none"> a) The Public Transport Item has a new item; PT connections Tauranga to Papamoa East Medium Term (2027-2034). b) The Community Facilities / Social Infrastructure Item has a new item; Active Reserve at Papamoa East - Te Tumu Medium Term (2027-2034).

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		67	9	Ford Land Holdings Pty Ltd	<p>FLH requests that:</p> <ul style="list-style-type: none"> a) The Public Transport Item has a new item; PT connections Tauranga to Papamoa East Medium Term (2027-2034). b) The Public Transport Item has a new item; Te Tumu Collector Roads in the 2027-2034 period. c) The Road Network Item has a new item; Te Tumu Collector Roads in the 2027-2034 period. d) The Road Network Item has a new item; Te Tumu Structure Plan Projects in the 2027-2034 period. e) The Road Network Item has a new item; Kaituna Link Transport Project in the 2034-2054 period. f) The Wastewater Item has a new item; Te Tumu Structure Plan Projects in the 2027-2034 period. g) The Water Supply Item has a new item; Te Tumu Structure Plan Projects in the 2027-2034 period. h) The Stormwater Item has the item; a new item; Te Tumu Structure Plan Projects in the 2027-2034 period. i) The Stormwater Item has the item; Wairakei to Kaituna Overflow - Phase 2 moved to 2027-2034. j) The Community Facilities / Social Infrastructure Item has a new item; Active Reserve at Papamoa East - Te Tumu Medium Term (2027-2034). k) The Education Item has a new item; New co-educational secondary school and Kura at Papamoa East - Te Tumu Medium Term (2027-2034). l) The Education Item has a new item; New primary school and Kura at Papamoa East - Te Tumu Medium Term (2027-2034).
		68	6	Tumu Kaituna 14 Trust	<p>TK14 requests that the Table on page 151 be amended as follows:</p> <p>Add:</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; Medium Term, Subject to Business Case. b) Te Tumu WWPS to Wairakei WWPS and Opal Drive WWPS including associated Rising Main Connections to Te Maunga WWTP; Medium Term, Subject to WSE Funding. c) Establishment of a new co-educational secondary school and Kura; Medium Term, Subject to Business Case. d) Establishment of a new primary school and Kura; Medium Term, Subject to Business Case. <p>Amend:</p> <ul style="list-style-type: none"> a) Te Tumu Trunk Mains to read Te Tumu Water Trunk Mains.
		68	8	Tumu Kaituna 14 Trust	<p>TK14 requests that:</p> <ul style="list-style-type: none"> a) The Public Transport Item has a new item; PT connections Tauranga to Papamoa East Medium Term (2027-2034). b) The Community Facilities / Social Infrastructure Item has a new item; Active Reserve at Papamoa East - Te Tumu Medium Term (2027-2034).
		68	9	Tumu Kaituna 14 Trust	<p>TK14 requests that:</p> <ul style="list-style-type: none"> a) The Public Transport Item has a new item; PT connections Tauranga to Papamoa East Medium Term (2027-2034). b) The Public Transport Item has a new item; Te Tumu Collector Roads in the 2027-2034 period. c) The Road Network Item has a new item; Te Tumu Collector Roads in the 2027-2034 period. d) The Road Network Item has a new item; Te Tumu Structure Plan Projects in the 2027-2034 period. e) The Wastewater Item has a new item; Te Tumu Structure Plan Projects in the 2027-2034 period. f) The Water Supply Item has a new item; Te Tumu Structure Plan Projects in the 2027-2034 period. g) The Stormwater Item has the item; a new item; Te Tumu Structure Plan Projects in the 2027-2034 period. h) The Stormwater Item has the item; Wairakei to Kaituna Overflow - Phase 2 moved to 2027-2034. i) The Community Facilities / Social Infrastructure Item has a new item; Active Reserve at Papamoa East - Te Tumu Medium Term (2027-2034). j) The Education Item has a new item; New co-educational secondary school and Kura at Papamoa East - Te Tumu Medium Term (2027-2034). k) The Education Item has a new item; New primary school and Kura at Papamoa East - Te Tumu Medium Term (2027-2034).

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		76	9	New Zealand Kiwifruit Growers	<p>The SmartGrowth Strategy is silent on the future demand for aggregate and where this will be sourced from. Like many others in the sub-region, growers and postharvest facilities rely on good roads. They are essential to ensuring that the fruit can be efficiently transported for packing and shipping.</p> <p>In our view, the demand for aggregate will likely increase for a number of reasons, firstly to support subdivisions and also to maintain roads that are likely to be affected by climate change. It may be that this has been considered elsewhere but this is not clear.</p> <p>In our view, aggregate demand needs to be estimated and future quarries identified and ringfenced to ensure that it can be affordably supplied in the future. Building houses on these areas would effectively sterilise them.</p>
		84	5	Mcmaster, Bill	<p>1.20 Both Transport (Chapter 8) Three Waters and Other Infrastructure (Chapter 9) will be significantly impacted by TCC proposed Plan Change 33 which will increase dwellings significantly in Mount North without any assessment of the impacts on transport, three waters and other infrastructure. This is out of line with the SGS objectives and implementation plan and could place considerable extra expenditure on the subregion to fund infrastructure improvements. This could compromise the SGS wider Western Bay priorities for infrastructure spend.</p>
		89	1	Transpower New Zealand Limited	<p>At the outset, Transpower is grateful for the opportunity to provide feedback on the SmartGrowth Strategy and supports its outcomes in principle. That said, aspects of the SmartGrowth Strategy need to be reviewed and updated to ensure that it meets the requirements for FDSs as set out in the NPSUD.</p> <p>In reviewing the SmartGrowth Strategy Transpower has been guided by SmartGrowth's obligations for preparation of an FDS set out in Subpart 4 "Future Development Strategies" in the NPSUD. The section "What is SmartGrowth" states on page 10: "In 2021, SmartGrowth began work on a Joint Spatial Plan. This Plan was put on hold so that it could integrate with a wider update of the SmartGrowth Strategy as a whole. This updated Strategy includes a future development strategy as required under the National Policy Statement on Urban Development." This means that the SmartGrowth Strategy is required to include and be informed by specific matters set out in sub-part 4 of the NPSUD. Transpower's comments on these matters are captured under the sub-headings below.</p> <p>What FDSs are informed by (NPSUD Section 3.14(1)(f))</p> <p>Section 3.14(1) of the NPSUD states that "every FDS must be informed by the following...(f) every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement." While the SmartGrowth Strategy includes a description of the "National context" including some national direction at page 29, the "Requirements" for spatial planning set out on page 47 do not include the NPSET in the "National environmental requirements". Under the RMA there is no hierarchy between national policy statements (NPSs). This means that the NPSET has equal weight alongside the other NPSs listed in terms of informing the SmartGrowth Strategy and fulfilling the requirements of an FDS under the NPSUD. Transpower observes that the SmartGrowth Strategy doesn't appear to have been clearly informed by the policy direction within the NPSET and wishes to see this addressed in the final version.</p> <p>The NPSET is also relevant in terms of the role that the National Grid will play in the electrification of the economy, both with regard to protecting existing assets, and enabling the construction of new connections to renewable energy and sources of demand. Both concepts are relevant to development and implementation of the SmartGrowth Strategy.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		89	2	Transpower New Zealand Limited	<p>Transpower seeks that the Strategy is updated to not only reference the NPSET as a relevant national policy statement under the RMA on page 47, but also that it demonstrates how the SmartGrowth Strategy has been informed by the policy direction contained within the NPSET. A logical starting point for this would be on page 57 "National environmental requirements."</p> <p>Purpose and content of FDS (NPSUD Section 3.13)</p> <p>This section sets out (among other matters), the purpose of an FDS and the matters that a FDS must spatially identify. In particular:</p> <p>3.13(2)(a) the broad locations in which development capacity will be provided for over the long term, in both existing and future urban areas, to meet the requirements of clauses 3.2 and 3.3.</p> <p>Transpower is neutral regarding the principle of urban intensification and growth areas but considers it essential to show the existing National Grid on specific maps to ensure that the development capacity is correctly informed by the National Grid corridor policy direction set out in the NPSET. See further detailed comments in relation to the "constraints on development" core content requirement below.</p> <p>3.13(2)(b) the development infrastructure and additional infrastructure required to support or service that development capacity, along with the general location of the corridors and other sites required to provide it.</p> <p>Transpower supports the reference to power supply on page 124, including the statement that "Power supply faces similar issues given strong population growth and increased power demand...there is an ongoing need to address reliable power supply issues in light of increased power demand driven both by population growth and electrification and decarbonisation of transport and industry." This statement reflects the preamble of the NPSET which states that ongoing investment in the transmission network and significant upgrades are expected to be required to meet the demand for electricity and to meet the Government's objective for a renewable energy future, therefore strategic planning to provide for transmission infrastructure is required. It also reflects the themes identified in the WBOP Development Plan.</p> <p>That said, the SmartGrowth Strategy does not include an assessment of the extent to which electricity supply is sufficient to support development, or recognition of the potential for transmission infrastructure to expand in the future to support electrification. With regard to electricity transmission, Transpower is happy to provide any required information to enable the details of electricity supply to be discussed and recorded accurately, including as necessary to ensure that the WBOP Development Plan demand scenarios align with those in the SmartGrowth Strategy.</p> <p>A final observation with regard to this requirement is that the assessment does not clearly articulate how all "additional infrastructure" has been considered in the context of servicing development capacity.</p>
		92	3	Murphy, Vincent	<ul style="list-style-type: none"> 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.
3: Maps		47	3	Fitter, Julian Richmond	Your cartographer appears not to know where Paengaroa is situated, it is consistently shown as Pongakawa.
		53	6	Bowden, Beth Willard	<ul style="list-style-type: none"> 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?
		59	11	Ministry Of Education	<p>It is noted that the potential long-term areas shown on Map 12 are those identified in UFTI but not yet investigated, consulted on, and confirmed. This seems at odds with Map 18 which shows one of these potential long-term areas (the Eastern Centre) as being a confirmed long-term growth area. This is further discussed in section 6 of this submission.</p> <p>Relief sought:</p> <ul style="list-style-type: none"> - Retain the growth directives as notified. - Retain Map 12 as notified.

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		59	14	Ministry Of Education	Map 17 "Existing and Proposed Sub-Regional Social Infrastructure" shows various categories of schools including kura, primary (including composite and contributing), secondary, and other school types (intermediate, teen, special schools). The scale of the map makes it difficult to determine whether all schools in the sub-region have been included, and the categories used to group different types of schools mean that some schools could be in more than one category. It would be simpler at this scale to group schools together. It is also important to note that the map only shows existing schools, despite the map title which suggests it may include proposed schools as well. Future schools will be planned in line with growth but are not mapped. Relief sought: - Amend Map 17 to clarify that the schools shown on the map are existing schools. - Amend Map 17 to retain kura as one category but re-named as 'existing kura' and group the other school categories together and re-name as 'existing schools'.
		59	16	Ministry Of Education	Amend Map 19 to show the correct location of the Keenan Road growth cell.
		59	5	Ministry Of Education	Some of the maps are more difficult to read than others because of the layering of growth areas on top of the 'no-go' and 'go-carefully' layers. It would be helpful if the 'planned' and 'potential long-term' growth areas could be shown as outlined rather than solid colours, which would make the other layers more easily visible. Relief sought: Amend maps in Part 3, Chapter 1 so that the 'planned' and 'potential long-term growth areas' are shown in outline rather than as solid colours, so as to allow the other layers to be more clearly visible.
		59	8	Ministry Of Education	Amend Map 5 so that the 'planned' and 'potential long-term growth areas' are shown in outline rather than as solid colours, to allow the areas at risk from climate change to be clearly visible. Amend Map 6 so that the 'planned' and 'potential long-term growth areas' are shown in outline rather than as solid colours, to allow the areas at risk from climate change to be clearly visible.
		60	8	Tangata whenua collective (CTWF workshop)	Map 2c - there is discomfort that archaeological sites and HAIL sites are on the same map. There is no need for them to be displayed together. Suggest separating.
		67	6	Ford Land Holdings Pty Ltd	FLH requests that: a) Map 18 on page 154 be amended to show Te Tumu moved to Medium Term (2027-2034). b) Map 18 on page 154 be amended to show the Kaituna Link transport connection from the eastern end of Te Tumu to Rangiuuru as shown on Map 6 of the 2013 SmartGrowth Strategy. c) Map 19 on page 155 be amended to show Te Tumu with a Potential 6,100+ dwellings.
		68	10	Tumu Kaituna 14 Trust	TK14 requests that: a) Map 18 on page 154 be amended to show Te Tumu moved to Medium Term (2027-2034). b) Map 19 on page 155 be amended to show Te Tumu with a Potential 6,100+ dwellings.
		72	15	Nga Potiki a Tamapahore Trust	Adopt Map 3 as notified, however suggest to tread with caution on identification of all significant cultural areas.
		72	17	Nga Potiki a Tamapahore Trust	Amend Figures 17 & 18 on Pages 71 and 72 to include Section 19 SO 489379, Sections 25, 26 and 27 SO 457368 within the TCC jurisdictional boundaries.
		72	21	Nga Potiki a Tamapahore Trust	NPaTT support the inclusion of Map 20 and seek that the land at Tara Road legally described as Section 19 SO 489379, Sections 25, 26 and 27 SO 45736 be identified for Maori development purposes. Adopt Map 20, with the amendment to include Section 19 SO 489379, Sections 25, 26 and 27 SO 457368 for Maori development.

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		76	3	New Zealand Kiwifruit Growers	<p>The climate change maps that are shown in the SmartGrowth Strategy are confusing. Maps 2a and 4 appear to show that the whole of Matakana Island is subject to coastal inundation. Figure 17, which is a snapshot of climate change risks to the Western Bay of Plenty, appears to show something different for Matakana Island but the legend is confusing. Figure 17 shows considerable river and surface flooding in the Te Puke and Pukehina areas, which are important areas for kiwifruit growing. The area of flooding in Figure 17 appears different to that shown in Map 4. Presumably the identified growth areas are not affected by flooding but the differences in the maps make this unclear. NZKGI wishes to better understand where the areas at risk from climate change are located because this is of interest to growers. NZKGI requested from BOPRC the shapefiles that show the areas at risk from coastal and inner harbour erosion and inundation. In response, we were advised that new information is currently being reviewed and formatted correctly before being made publicly available, which will hopefully be by the end of this year.</p> <p>We understand that the WBOPDC Mapi maps contain the climate change related information at a better scale. Our preference, however, is to wait until the updated maps are available and to review the information then. Presumably the SmartGrowth team will do the same and will make any necessary changes as a result of the new information.</p>
		76	8	New Zealand Kiwifruit Growers	<p>Map 11 shows land use areas including the land that is used for kiwifruit growing. The kiwifruit growing area is based on 2017 data and there has been significant expansion of the industry since then. While it may be considered that there is no need to update the map at this point in time, we note the significant reverse sensitivity issues that can arise when new housing developments are located close to kiwifruit orchards. These issues include complaints regarding agrichemical spraying and audible bird scaring devices.</p> <p>It will be difficult for the potential for reverse sensitivity to be appropriately considered by the planners if they are looking at outdated maps of where the kiwifruit orchards are located. We encourage ground-truthing and the use of appropriate buffer zones to prevent future problems.</p>
		82	10	Batchelar, Craig	<p>Submission: Minor Graphical Change to Map 19 where housing call out box is pointing to the wrong area. Amendment sought: Keenan Road pointer is pointing at the wrong area - should be pointing to the smaller green area to the south-east of Tauriko West.</p>
		82	6	Batchelar, Craig	<p>Some grey areas may be suitable for intensification. Add text to clarify that these areas can be for intensification. Legend might be better reordered, with existing urban areas first, then industry area, then planned growth areas, then potential long-term growth areas. Amend maps so they are shown consistently across all (sometime shown with an outline, sometimes solid colour) Any other corrections/clarifications to the maps required.</p>
		82	8	Batchelar, Craig	<p>Submission: The intensification areas on Map 18 may need to be updated following the MDRS plan change hearings, in particular the label "Medium Density Residential to 20 metres" needs to be clarified. Amendment sought: Delete "to 20 metres". Update any of the intensification areas in line with outcomes from the MDRS plan changes.</p> <p>Submission: "Eastern Centre" and "Western Corridor" (Belk, Joyce, Merrick) are referred to and should be indicated (named) on the maps/graphics. Amendment sought: Identify Eastern Centre and other areas as appropriate, including on on Map 18.</p>
		84	8	Mcmaster, Bill	<p>1.32 Map18 on page 154 of the SGS outlines the FDS Staging Map - Mount North is not identified with an orange dot as High Density Residential apart for the existing area of the High-Rise zoned for part of Mount Maunganui.</p> <p>1.33 Part 5 Implementing the SGS. It is noted in this part of the SGS that the Implementation and Funding Plan (IFP) will be developed as a separate document and updated annually. It is not part of the FDS under the NPS-UD.</p>
		87	13	Ngai Tukairangi Trust	<p>Map 2c - there is discomfort that archaeological sites and HAIL sites are on the same map. There is no need for them to be displayed together.</p>

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4: Industrial land		49	1	Thwaites, Donald Alan	<p>Further investigation of business land development at Apata is required. Possible Industrial land identified south of Omokoroa is better suited as Omokoroa residential stage 4 and land south of TNL Stage 2 running back to Whakamarama should be investigated as mixed lifestyle/residential to be Omokoroa stage 5.</p> <p>If a secondary school is to be built at Omokoroa , these extended residential growth areas would support the provision of these new schools.</p> <p>The Apata area is worthy of investigation for industrial development.</p> <p>Residential growth in Katikati and Omokoroa would supply housing for this area.</p> <p>Double tracking of the rail between Apata and Tauranga over the next 50 years would support the port of Tauranga and provide commuter capacity between Apata and Tga / Te Maunga / Te Puke</p> <p>A second Kaimai rail tunnel for resilience and capacity would enhance this transport corridor.</p> <p>Te Puna is not a suitable location for any further industrial activity.</p> <p>Long term (30 years) - a commercial centre to serve a residential Te Puna requires planning . The protection of the Bayfair commercial area from the late 1960's is an great example of long term planning.</p>
		65	5	Te Puke Economic Development Group	<p>Smart Growth has identified shortages in industrial land and the need for new industrial zones.</p> <p>The Rangiuru Business Park is an important part of the solution particularly for larger scale industry.</p> <p>At the same time, it is important that new industrial land is made available in the vicinity of the Te Puke township. The township has a wealth of small to medium industrial businesses and is a strategic location for more growth. Case in point - the existing 'West' industrial zone.</p> <p>Willing land owners, a willing developer and a business investor wanting to make this happen.</p> <p>Unfortunately, the consenting process is slow and frustrating. This is a perfect example of how Smart Growth can make a positive difference by endorsing a sensible growth initiative that will deliver economic benefits. A 'make it happen' attitude, a sunrise frame of mind as opposed to a sunset mentality and a sense of urgency will be warmly welcomed.</p> <p>Enabling swift consenting for the 'West' Industrial Zone will inspire investors & developers and will lead to the identification of other suitable land for development.</p> <p>We acknowledge that climate change is real and risks must be mitigated. Waterways, flood prone areas and roading challenges highlight the need for fit for purpose infrastructure. Overcoming challenges and finding solutions is what Te Puke does best.</p>
		66	1	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	<p>1 This feedback relates to the SGS, and in particular the lack of recognition in that document that existing industrial activities in terms of the content of the SGS. In particular the submission is concerned with ensuring the following matters are recognised and provided for:</p> <ul style="list-style-type: none"> 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
		66	3	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	<p>GB also supports the acknowledgment that there is shortfall in industrial land, particularly within the Mount Maunganui/Port industrial area, whereby the SGS states that "Growth in the sub-region is such that the housing and business development capacity assessment (HBA) has indicated that there is a shortfall in industrial land. In addition, the SmartGrowth partners have also been working collaboratively on several other projects that relate to industrial land, particularly work relating to the Mount Maunganui/Port industrial area.</p> <p>5 However, GB's key concern that the SGS does not place a strong enough emphasis on protecting and supporting existing industrial activities, particularly within the Port of Tauranga. GB considers that industrial activities, such as those conducted by GB, plays a key role both regionally in terms of the economy and nationally in terms of providing for construction material to assist the housing delivery set out in the National Planning Standards for Urban Development (NPS-UD).</p> <p>6 GB seeks amendments to the SGS, particularly to ensure that the operational and functional need of industrial activities on industrial land within the Port of Tauranga are supported. Furthermore, GB seeks that industrial activities are recognised for their contribution to both the economy and assisting in housing delivery both at a regional and national level.</p>

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		66	4	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	<p>14 Under Part 3 'The Spatial Plan - Business Employment Land' of the SGS, it states:</p> <p>"The potential for a reduction in existing land combined with strong demand for industrial land to support growth has meant that additional industrial land needs to be identified. Potential locations for future industrial land have been identified in Part 4 of this Strategy."2</p> <p>15 GB supports the recognition that there is strong demand for industrial land and supporting industrial growth.</p>
		66	6	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	<p>The key concern for GB is that whilst the SGS identifies a range of significant issues, which place pressure on existing industrial land across Tauranga, it does not explicitly recognise the important role industrial activities (including those at the Port) play both in an economic growth but also in the ability to assist in housing delivery. In a spatial sense, GB submits that there needs to be greater support and protection for industrial activities where there is an operational need to locate within the Port Industrial area.</p> <p>GB seeks amendments to draft SGS to ensure that the overall intention to provide for the continued development and intensification of existing industrial land to protect business and industrial land in the most effective and efficient manner, which will in turn assist in the growth of the regional and national economy and assist in housing supply.</p>
		66	7	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	<p>In summary, GB seeks that the SGS strengthens the protection of existing Industrial zoned land in order to give effect to Policy 2 of the NPS UD as it relates to business land. In particular, recognise and make provision in the SGS such that the role of existing industrial land is able to continue to make a contribution to the goal of providing "at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term."8 (emphasis added). To give effect to this, the specific relief (any such consequential relief) sought by GB is:</p> <ul style="list-style-type: none"> i. Insert additional wording in Part 1: Introduction and Context - Economic Objectives9 to recognise and support existing industrial activities to that provide for economic and housing growth as set out in Appendix B. ii. Amend wording in Part 1: Introduction and Context - Sub-Regional Context- Marine Corridor10 to recognise industrial activities also require shipping links to and from the Port. iii. Amend wording in Part 2: The Growth Challenge - Opportunities11 to recognise that industrial activities are an economic opportunity for the region as set out in Appendix B. iv. Amend wording in Part 3: The Spatial Plan - Chapter 06. Urban Form and Centres12 introduction to recognise that "construction materials" be included as a key industry to the nationally significant Port of Tauranga as set out in Appendix B. v. Insert additional wording in Part 3: The Spatial Plan - Chapter 07. Housing - Housing system growth directives13 that supports existing local industries that provide for construction materials that assist in housing delivery as set out in Appendix B.
		66	11	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	<p>GB recognise that "construction materials" be included as a key industry to the nationally significant Port of Tauranga. Amend second paragraph on page 102 as follows: The connected centres programme also outlines business growth within the sub-region, supporting growth in appropriate areas and enabling reliable movement to and from key industries such as horticulture and construction materials to the nationally significant Port of Tauranga. Currently there is adequate land supply to accommodate business (commercial and industrial) growth in the short term. However, as our sub-region continues to grow, we will need to plan and cater for future demand that supports the connected centres programme.</p>
		66	5	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	<p>However, the 'Urban form and centres growth directives' do not recognise the pressure on industrial land and does not seem to support the continued development and potential intensification of existing industrial land to ensure effective and efficient use of existing industrial land.</p>

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		70	0	Element Imf Ltd	Stage 4 of the Tauriko Business Estate was being considered by Tauranga City Council. The area comprised of 92 hectares, of which only 46 hectares were enabled by the first stage of highway works. Once the 46 hectares have been sold the remaining land will be unable to released for a long period of time as there would be no infrastructure to sustain the development.
		74	1	Waste Management Nz Ltd	It is essential that the SmartGrowth Strategy, particularly the draft Spatial Plan and Future Development Strategy, appropriately provide for existing industry and its needs, and recognise the substantial benefits industry provides to Tauranga and the wider region.
		74	2	Waste Management Nz Ltd	In our view, there is a balance to be struck between enabling and providing for industry, that has a practical and substantial economic benefit to the City and Region, as well as providing for intensified residential development and the need to manage future development in hazard-prone areas. Waste Management considers that some of the proposals and directions within the SmartGrowth Strategy require further consultation and ultimately refinement, to ensure they provide for a pragmatic and workable approach to addressing those competing interests.
		74	8	Waste Management Nz Ltd	<p>The SmartGrowth Strategy clearly sets out that the sub-regional demand for business land, including industrial land, is set to grow over the next 30-years. However, it is unclear how the SmartGrowth Strategy intends on meeting anticipated demand for industrial land, in its current form. While there is a clear need for industrial land in the future, similar to the Mount to Arataki Spatial Plan, there is a lack of recognition in the SmartGrowth Strategy around the significant benefits that industry provides, as well as the actions industries currently take to reduce their impacts. Waste Management considers that the SmartGrowth Partnership must provide greater certainty for industries in the SmartGrowth Strategy. This includes through:</p> <p>(a) equal recognition of existing industrial uses, particularly at the Truman Lane Site and the Oil Recovery Site, as well as recognition of the constraints industries face which otherwise hinders their ability to internalise all of their effects, as discussed above; and</p> <p>(b) recognition of the adverse health and amenity effects and reverse sensitivity effects, should residential housing be directed in proximity to effects-generating industrial activity.</p>
		78	1	Clear The Air & Tauranga Moana Fumigant Group	<p>7. The Draft SmartGrowth Strategy identifies the need for a further 300 -400 hectares of greenfield business land over the next 30 years and that technical investigations have identified a number of possible locations for future business land.</p> <p>8. It is not clear whether any of these sites will be able to accommodate heavy industry that causes cumulative adverse effects, particularly on air quality.</p> <p>9. While the intention that all industrial zones should be clean and green is a worthy aspiration, the reality is that all regions need to host industries that generate effects that are hard to manage to a low level of risk, without significant separation from sensitive land uses.</p> <p>10. If provision for heavy industry in specific suitable locations is not made through SmartGrowth, there is no scope for long term relocation of existing heavy industry emitters where those activities are located in unsuitable locations affecting residential areas or sensitive areas such as Whareroa Marae.</p> <p>11. New emitting industrial activities will also need to locate outside the region due to uncertainty of where in the region it is suitable to locate to, increasing costs and carbon emissions from transportation, and pushing pollutants unwittingly onto other host</p> <p>12. All industrial areas need to significantly lift their performance in managing environmental effects to reduce existing impacts on the environment and on the health of people to acceptable levels in or near residential urban or other sensitive activities/areas. All the SmartGrowth Partners need to commit to addressing this through compliance, integrated land use and natural resources management, as well through future plan changes and strategies.</p> <p>13. There is a need to align zoning and plan provisions with the National Planning Standards and differentiate light medium and heavy industry zones. This work needs to be completed urgently. The review needs to involve the Bay of Plenty Regional Council to address integration between land use and the regional plan provisions for air and water quality, and should include collaboration with key stakeholders, such as CTA.</p>

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		81	7	Urban Task Force	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 Rangiuuru 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.
		82	9	Batchelar, Craig	Submission: Add additional text on alongside Map 18 regarding the Industrial Land Study. Amendment: Add additional text to the FDS map alongside the existing text which states: "The Future Development Areas are indicative only". Additional text to state: "The Industrial Land Study has been undertaken using desktop information only, further investigations are required. The locations of potential industrial land as shown on the map are indicative only. For example in the Northern Corridor there are a range of long listed sites in the Apata and Omokoroa area for long-term consideration."
		83	10	Bell Road Limited Partnership	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. 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." No further business land has been specifically identified in the draft Strategy for the Eastern/Central corridors. Te Tumu and Rangiuuru are already identified in "existing allocations" These areas are excluded from the further 300-400ha required. The primary basis for the Employment Land assessment is the Aurecon Industrial Land Study completed in June 2023. 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.

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		83	12	Bell Road Limited Partnership	<p>Wairakei South Urban Growth Area</p> <p>Wairakei South Urban Growth Area (Wairakei South) lies within a strategic area bordered by the Wairakei residential development, the Kaituna River, and Te Puke and the TEL. The Draft Strategy identifies the Wairakei South land as "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:</p> <p>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.</p> <p>The Aurecon report also noted for the Central Corridor (Domain Rd 1 and 2, Tara Rd 1 and 2, and Ottawa:</p> <p>This combined area along the Eastern Link and taking in Domain Road, Tara Road, and Bell Road, was selected with the intent to identify and recommend the more suitable areas within this larger combined area for industrial land development. It is located centrally and has attractive transport and other connectivity benefits; however some significant land quality and capability constraints are evident, including proximity to coast with potential flooding and coastal inundation risks.</p> <p>These flooding, coastal inundation risks and land quality constraints do not relate to the Ottawa 1 land as The Bell Road LP have confirmed engineering solutions to address flooding, building platform levels and the preloading of sites.</p>
		83	5	Bell Road Limited Partnership	<p>Integrity of the Strategy</p> <p>It is critically important that the integrity of the Draft Strategy is not undermined by individual SmartGrowth partners.</p> <p>In particular, background reports which identify and categorise areas suitable for employment land should be applied in the Draft Strategy based on the technical assessments completed by experts.</p>
		94	5	Katikati Community Board	<p>Smart Growth has identified shortages in industrial land and the need for new industrial zones. The Katikati Business Park is an important part of the solution particularly for light innovative and clean industry. The township has a wealth of small to medium industrial businesses and is a strategic location for more growth. The existing Katikati industrial zone. Willing land owners, a willing developer and a business investor wanting to make this happen. Unfortunately, the consenting process is slow and frustrating for over 20 years. This is a perfect example of how Smart Growth can make a positive difference by endorsing a sensible growth initiative that will deliver economic benefits. A 'make it happen' attitude, a sunrise frame of mind as opposed to a sunset mentality and a sense of urgency will be warmly welcomed. Enabling swift consenting for the Katikati Industrial Zone will inspire investors & developers and will lead to the identification of other suitable land for development. We acknowledge that climate change is real and risks must be mitigated. Waterways, flood prone areas and roading challenges highlight the need for fit for purpose infrastructure. Overcoming challenges and finding solutions is what Katikati does best.</p>
5: Support		53	18	Bowden, Beth Willard	<p>I accept the requirements and the constraints imposed by legislative and national policy statements and that both SmartGrowth and our Councils must work within these. Especially as we transition between governments and move to a political environment that may well change a number of the settings that underpinned this Strategy, I welcome further discussions and debate beyond the Special Consultative Procedure (see following remarks).</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		63	1	Landsdale Development Ltd	<p>The Future Development Strategy (FDS) within the SmartGrowth Strategy identifies the site as Ohauti South (Western Corridor), with potential for:</p> <ul style="list-style-type: none"> • 190 (Dwellings Medium Term 2027-2034); and • 280 (Dwellings Long Term 2034-2054) <p>The site provides land and infrastructure to contribute positively to the identified housing shortfall. (addresses Challenge 1, taking into account other challenges). The site has not been identified on the Hazard 'No-Go' (Map 2) or the 'Areas at Risk from Climate Change' (Map 5).</p> <p>Landsdale seeks that the inclusion of Ohauti South in the FDS as a Medium Term Growth Area be retained.</p> <p>The private plan change is actively being progressed, and the developer is committed to delivering much-needed housing (with associated cycling, walking, public transport-capable roading infrastructure, reserves and other services infrastructure) at the earliest opportunity. The current "medium term" timing will enable rezoning, earthworks and subdivision consent processes between 2024 and 2026, with the delivery of the first houses from 2027.</p>
		70	1	Element Imf Ltd	<p>Within the Strategy, TBE Stages 1-3 are recognised as "existing urban areas" and/or "industrial zone", while Stage 4 is identified as a "planned growth area" and is also referred to as the "extension" to the TBE. Land to the south of Stage 4, in the area known as 'Upper Belk Road', is identified as a "potential long-term growth area". We support the identification of these areas as such within the Western Corridor, noting that the Upper Belk Road planned growth area presents the opportunity to incorporate future industrial land-use. This is confirmed in the FDS (page 149), and is thus likewise supported.</p>
		92	1	Murphy, Vincent	<p>Overall, generally support the direction and robust work going in to the FDS.</p>
6: Population assumptions		42	3	Gordon, Carole	<p>The demographic paradigm shift requires inclusion in the SmartGrowth strategic context as a key driver for achieving integrated policy planning and innovative co-design action on housing, mobility, healthcare and neighbourhoods. It is noted (p21) that the demographics will have a "profound influence on how we plan." It is difficult to find 'how', in the strategic plan.' Perhaps there are too many plans?</p> <p>The Strategy document lacks clear readable population data. Change profiles are necessary to inform a platform for innovative urban planning and wider policy responses to social equity and population structural change:</p> <ul style="list-style-type: none"> • High Maori birth-rate, more rangitahi, more whanau connectivity. • Responses to increasing poverty, people on low incomes and those of ethnic and ablement diversity. • Increasing demand for quality, secure, affordable rental accommodation. • Rapid increase of more Elders living longer requiring lifetime homes to independently age-in-place-in-community with dignity, social connectivity and access to affordable healthcare services. • Burgeoning growth of unsustainable profit centred retirement villages that create an unhealthy intergenerational separation of Elders from society. The Silver Economy loss to the region is substantial. Trends indicate that end of life care provision will be limited to wealthy clients. • There is a growing Elder care crisis to be addressed. <p>These factors will shape the social and economic cultural future of the sub region.</p> <p>It must be emphasised that as a society, we have not met these 'never before in history' population phenomena before. The challenge is now.</p>

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		42	4	Gordon, Carole	<p>The strategy reflects a dominant focus on 'growth' and land use. It proffers new places to put houses, roading and infrastructure required. Yet, an analysis of the demographic estimated projections indicates that there will be limited growth in cohorts other than 65-100+ which will see rapid growth to 2048.iii (See graphs) Will the new planned greenfield places suit Elders seeking an affordable right sized home? It is unlikely they would have local access to the essential services they need within their lifetime. A serious market perception check is needed.</p> <p>1 Actions: 1.1 Clearly indicate the changing demographic structure in: age cohort graphs, including the population structure of Tangata Whenua, so that everyone in all sectors, including the business community, understands the nature of the remarkable ageing population shift, and can begin to process the implications. 1.2 Strengthen housing, transport, health and community social infrastructure sections to reflect higher levels of age and culturally relevant focussed service. 1.3 Detail sub-regional strategies necessary to align with the UN Decade for Healthy Ageing goals congruent with both the Government's Healthy Ageing Strategy 2016, Better Later Life Strategy 2019-2034. Further it should reflect the intent of the HUD Policy Brief, The Long Term Implications of our Ageing Population For Our Housing and Urban Futures, 2023.</p>
		42	5	Gordon, Carole	<p>Population data in the Strategy should be disaggregated wherever possible to avoid homogenising cohorts such as 65+. This outmoded practice creates invisibility, influences discourse, and leads to a lack of inclusion in planning perspectives.</p>
		53	25	Bowden, Beth Willard	<p>Can we establish with some clarity just what the projections are? Population growth is variously described within the Strategy - "an envisioned population scenario of 400,000 over the next 50 plus years" (p.12); "projected to reach between 246,100 and 317,500 people in the next 30 years" (p.21). I can see that these are not necessarily incompatible, but the use of two differing time-frames may not assist clear policy formation and implementation.</p> <p>Housing requirements are similarly confusing. The TCC seems to rely on 19,000 dwellings expected of its intensification efforts but there are public pronouncements of 25,000 potentially available in the western corridor (provided a new road is put out there). The Strategy discusses shortfalls in supply but does not actually put forward scenarios as to how many houses would be enough: "These numbers are based on the likely expected population (Stats NZ medium-high projections October, 2022) which generates overall housing demand. The housing demand includes the existing housing shortfalls identified as at July 2022, and the additional 15% and 20% required as the competitiveness margins in the NPS-UD" (footnote, p. 142).</p> <p>Distinctions between urban-intensified housing typologies and rural needs (clusters around transport and service hubs, accomodation for itinerant workers) are adequately addressed.</p> <p>There is also over-much reliance on assumptions that Maori land is an easy source of supply for development. History tells us that is not the case. Once again, the absense of an Implementation and Funding Plan is evident. I would advocate for a significant and seperate Plan to be worked through the Tangata Whenua Forum on the matter.</p>
		64	1	Classic Group	<p>Skepticism Regarding Infill Development Forecasts: Upon reviewing the provided growth forecasts, there is a notable level of skepticism, particularly concerning the projected spike in infill development. The basis upon which these forecasts are made remains unclear, raising concerns about the accuracy and feasibility of the anticipated surge in infill development. We are very skeptical that this will occur which will only make the predicted shortfall worse.</p>
		65	6	Te Puke Economic Development Group	<p>We encourage Smart Growth to be mindful of:-</p> <ul style="list-style-type: none"> • An ageing population • The incredible opportunities that will emerge with the growth of the Maori population • Growth in immigration <p>Specific planning and swift delivery of housing, transport and accessibility solutions for these demographics must be elevated to high priority.</p>
		67	2	Ford Land Holdings Pty Ltd	<p>FLH requests that the Table on page 147 be amended as follows: 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</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		67	3	Ford Land Holdings Pty Ltd	FLH requests that the Table on page 148 be amended as follows: a) Te Tumu Dwelling Opportunity Post 2054; 2,000. This is based on the opportunity over time for increased residential densities to be achieved.
		67	4	Ford Land Holdings Pty Ltd	FLH requests that the Table on page 148 be amended as follows: a) Te Tumu (Employment Land) Medium Term (2027-2034); 60ha. b) Te Tumu (Employment Land) Medium Term (2034-2054); 0ha.
		68	3	Tumu Kaituna 14 Trust	TK14 requests that the Table on page 147 be amended as follows: a) Te Tumu Dwellings Medium Term (2027-2034); 2,100. b) Te Tumu Dwellings Long Term (2034-2054); 4,000. c) Te Tumu Totals 2024-54; 6,100. This reflects to Te Tumu Structure Planning that has been carried out
		68	4	Tumu Kaituna 14 Trust	TK14 requests that the Table on page 148 be amended as follows: a) Te Tumu Dwelling Opportunity Post 2054; 2,000. This is based on the opportunity over time for increased residential densities to be achieved.
		68	5	Tumu Kaituna 14 Trust	TK14 requests that the Table on page 148 be amended as follows: a) Te Tumu (Employment Land) Medium Term (2027-2034); 60ha. b) Te Tumu (Employment Land) Medium Term (2034-2054); 0ha.
		73	2	Property Council New Zealand	5. Data and Analysis 5.1 Property Council acknowledges the work undertaken to develop residential population growth and housing capacity estimates. While we are comfortable with the modelling as it currently stands, we would note that population growth and housing capacity modelling is not an exact science. There are a wide range of changing variables such as immigration settings or internal migration patterns. It is important to ensure that a flexible approach is taken, that can account for changing variables over time. 5.2 For example, if population growth tracks higher than forecast, it would be important to ensure additional residential land supply over and above what is currently catered for. Furthermore, as SmartGrowth partner councils impose more requirements or overlays on land, such as the Slope Hazard Overlay released in October 2023 by Tauranga City Council, there is risk that this could impact negatively on the housing capacity modelling. 5.3 Property Council acknowledges the work undertaken to develop business and industrial demand and capacity modelling. We note that there has been significant business and industrial land price inflation in recent years, largely as a result of shortages of land supply. This impacts the economic competitiveness of the region and limits our capacity to attract much needed new investment. There are a wide range of variables when it comes to business and industrial modelling which include uncertainty regarding the future of industrial land in the Mount Manganui area or increased demand associated with proposed expansion of the Port of Tauranga. 5.4 Accordingly, Property Council recommends that SmartGrowth ensures a flexible approach to future land supply (residential and business) that accounts for changing variables. This will help maintain competitive land markets across the region and help prevent unintended consequences such as shortages of housing or lack of land for business.
		80	4	Hickson, Paul	I recall some of the parameters I have read in past Smart Growth reports underestimated the growth of the kiwifruit industry. Projections for rural house growth are far too low over the period. I also note that the census is taken before the peak of the kiwifruit season and therefore population counts are lower than peak so planning may be flawed as a result. Of course the same applies to tourist centres like the Mount, Pukehina and Waihi Beach.

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		84	7	Mcmaster, Bill	<p>1.25 The Market Economics report tabled as part of PC33 evidence states that the proposed Council new height and density provisions enable approximately 497,590 more dwellings through PC 33 for the Tauranga area.</p> <p>1.26 The SmartGrowth Housing and Business Capacity Assessment 2021 (HBA) estimated that between 37,000 and 43,000 new homes will need to be built to keep up with demand in the western Bay of Plenty sub-region over the next 30 years (Pg 142). Of this Tauranga is projected to require another 30,000 to 34,000 new houses over the next 30 years.</p> <p>1.27 The table on Pg 143 shows a shortfall in development capacity of 1,620 or 7,930 houses across the sub-region.</p> <p>1.28 TCC's PC 33 is enabling significantly more dwellings than what is currently needed for Tauranga's forecast growth, as identified through the SGS. This means that PC33 is out of sequence with the SGS and must be disputed by the SG partners.</p> <p>1.29 Tauranga City Council's required housing numbers in PC33 are overstated and high density intensification at the Mount is not required to achieve the requisite SGS housing numbers and must be very low priority.</p> <p>1.30 The SGS on pg 143 identifies that TCC has found that its proposed expenditure programme over the 2024-34 period is unsustainably large from a fiscal and delivery perspective. This will require a reduction in the programme for investment to support housing intensification. This has implications for when new development capacity will become available</p> <p>1.31 The table on page 147 outlines the proposed dwelling allocations over the next 30 years to support the connected centres programme. Tauranga City has an allocation of 11,400 to 15,000 dwellings between 2024 to 2054.</p>
		91	13	Sustainable Bop Trust	Why isn't TCC's RER number (19,000 dwellings) being used for the SG Strategy infill / intensification number (that'd result in 50% infill / intensification)?
		91	24	Sustainable Bop Trust	<p>14. Does the Strategy fully account for the projected large increases in 65+ age group?</p> <p>15. Will it meet the needs of that fastest growing age group and the different needs of 65-74, 75-84, and 85+ year olds?</p>
		91	5	Sustainable Bop Trust	<p>Strategic Demographic Issues</p> <p>We are not convinced the Draft Strategy has fully and adequately considered three vitally important strategic issues:</p> <ul style="list-style-type: none"> • 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 Maori youth population - we are not sure if this has been adequately provided for in regards to specific housing needs in relation to workplaces` <p>The punchline is obvious: we need to design our city and sub-region to meet the needs of this rapidly aging population, including the large number of immigrants coming from outside the region.</p>
		94	6	Katikati Community Board	<p>We encourage Smart Growth to be mindful of:-</p> <ul style="list-style-type: none"> • An ageing population • The incredible opportunities that will emerge with the growth in eco-agriculture • Growth in immigration <p>Specific planning and swift delivery of housing, transport and accessibility solutions for these demographics must be elevated to high priority.</p>
7: Settlement pattern		42	17	Gordon, Carole	3.3 Give the East the Villages they desire not an UFTI constructed City.

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		44	3	Conlon, Bruce Nicholas	Please see the previous where Welcome bay, does see to continue to be forgotten in plans, and its such a beautiful and culturally rich area. Also, infrastructure like a supermarket, shopping area, as the Welcome Bay village really is far too small for the populations needs, and travel to the city is congested. Environmentally the amount we have to drive each day as we don't have the services, multiplied by the population must be having a detrimental impact.
		47	4	Fitter, Julian Richmond	Paengaroa should be a key focus for development along with Te Puke, it already has the necessary Road and Rail infrastructure.
		59	15	Ministry Of Education	In order to address the shortfall, the draft Strategy outlines the need to rely on bringing forward land in the east and west and achieve a greater level of intensification. The draft Strategy also notes that the Eastern Centre may be required earlier and at a greater scale if development capacity is not provided as anticipated in other identified areas. Maps 1-12, 15-17 and 19 show the Eastern Centre, Te Puna and the wider Tauranga Western Corridor as 'potential long-term growth areas'. However, on Map 18 - Future Development Strategy Staging Map - the Eastern Centre is identified as a confirmed long-term growth area. As a result, there is some confusion as to what the preferred 30-year growth pattern is for the sub-region. The draft Strategy needs to be clearer about the status of the Eastern Centre, particularly if the Tauranga Western Corridor SDP is confirmed. Relief sought: - Clarify the timing and status of the Eastern Centre. - Clarify whether both the full Tauranga Western Corridor SDP area (including the potential growth areas) and the Eastern Centre would be needed within the 30-year timeframe if the TWC SDP is confirmed. - Staging or relative priority of growth in the corridors would be helpful, and this should form part of the Implementation and Funding Plan.
		65	4	Te Puke Economic Development Group	We support the plan to explore and potentially develop in the longer term a new 15000+ settlement east of the Te Puke township. Concurrent with this initiative it is important that we stimulate immediate residential growth in the Te Puke township, Paengaroa and Pongakawa. An assessment of Maori land suitable for housing solutions in Maketu and an extension of coastal settlements past Pukehina further east should also be explored. These settlements are well established and are central to our economic drivers. It is not a case of one or the other (new 15000+ settlement or growth of existing settlements). We need housing now to match economic growth. We need to progress both initiatives. Central government support is important for success. Timing is everything and with a change of Government the time is now. The incoming Government are very clear on 3 points:- a. The MDRS or Sausage flat law designed to prevent urban sprawl will be gone in 100 days. They have a preference for greater focus on greenfield developments which will allow conversion of farmland to new residential settlements. b. Repealing three waters reform and a return to local management is positive. c. RMA reform will remove red tape and hindrance to progress. Additionally, decentralisation will encourage localism and a 'can do' attitude. Distant bureaucrats with no local knowledge making decisions from afar does little for sensible progress. This is a terrific opportunity for Smart Growth to impress upon central government the need for access to infrastructure funding. Smart Growth must endorse a program for the Te Puke region to deliver new housing in the township and in the rural settlements we have identified. With green lights instead of red and clearly defined pathways for swift progress, land owners and housing developers will act quickly. It should also be noted that this can be a sensible and balanced program of rural land conversion in sync with economic growth.
		67	1	Ford Land Holdings Pty Ltd	As noted above, through the extensive research, investigation and planning carried out on Te Tumu the proposed urbanisation of Te Tumu addresses and satisfies the key objectives and outcomes identified and sought in the SmartGrowth Strategy - see above; accordingly FLH requests that this section of the FDS contain a statement that SmartGrowth and TCC will commit to work with FLH and the Te Tumu Landowners to progress a Plan Change for the Te Tumu Urban Growth Management Area so it can be notified before the end of 2024.

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		68	1	Tumu Kaituna 14 Trust	<p>The Tumu Kaituna 14 Trust (TK14) have 240ha of land in the Papamoa East Te Tumu Growth Management Area and have been actively involved with the SmartGrowth Partners with regard to the urbanisation of Te Tumu for over 20 years since SmartGrowth started in 2000. Te Tumu was identified as a Growth Management Area in the original SmartGrowth Strategy that was published in 2004; since that time Te Tumu was confirmed as a Growth Management Area in the:</p> <ol style="list-style-type: none"> 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. More recently an extensive consultation process was undertaken by the TK14 Trustees in 2022 with the TK14 Owners, with one of the key outcomes being that a resolution was adopted for representatives of the TK14 Trust to negotiate with TCC on suitable mechanisms to provide infrastructure through the TK14 Block which would support the urban development of the entire Te Tumu urban growth area. The majority of Trust owners who engaged in the 2022 engagement process, supported these negotiations proceeding. The negotiations are substantially advanced.</p> <p>In the context of the above background TK14 were very surprised and disappointed that the Te Tumu Development Timeframe in the Future Development Strategy (FDS) has been pushed out to the Long Term 2034-2054 period.</p> <p>Key Submission Points</p> <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.
		68	2	Tumu Kaituna 14 Trust	<p>As noted above, through the extensive research, investigation and planning carried out on Te Tumu the proposed urbanisation of Te Tumu addresses and satisfies the key objectives and outcomes identified and sought in the SmartGrowth Strategy - see above; accordingly TK14 requests that this section of the FDS contain a statement that SmartGrowth and TCC will commit to work with TK14 and the Te Tumu Landowners to progress a Plan Change for the Te Tumu Urban Growth Management Area so it can be notified before the end of 2024.</p>
		69	4	Pirirakau Tribal Authority - Incorporated	<p>15. Pirirakau seeks an 'off limit' layer of Te Puna and Huharua involving Whakamarama also as an agreed consequence of enabling Omokoroa full urbanisation. Stop developing the Pirirakau rohe to retain rural character for ecological benefit offsetting the urbanisation of the wider Tauranga growth cells and Omokoroa. Honour the promises that were made that inform this.</p>
		72	16	Nga Potiki a Tamapahore Trust	<p>Map 3B includes general areas for Maori land development which NPaTT supports, however it considers that Maori owned land, that is not Maori land as defined by Te Ture Whenua, could also be considered as a Maori development focus area. Adopt Map 3 as notified, but include the land located to the south of Tara Road legally described as Section 19 SO 489379, Sections 25, 26 and 27 SO 457368 as a potential focus area.</p>

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		72	20	Nga Potiki a Tamapahore Trust	Amend the FDS map 18 to include Section 19 SO 489379, Sections 25, 26 and 27 SO 457368 as staged growth areas either for the short term or medium term.
		73	4	Property Council New Zealand	6.2 In terms of the proposed Key Growth Areas, while Property Council supports the intent behind classifying the Eastern Centre as a Key Growth Area, we are concerned that there appears to not have been sufficient preparatory work undertaken to evaluate and lay the groundwork for future urban development in the area. Additionally, we would also suggest that SmartGrowth should further investigate the development potential of Te Puna area and the wider northern corridor, for both residential and business developments.
		78	2	Clear The Air & Tauranga Moana Fumigant Group	14. There is a very real risk that intensive residential development enabled by PC 33 will increase exposure of people to unacceptable health hazards associated with the polluted airshed at Mount Maunganui. This also affects Pillans Point and Mount Maunganui.
		79	0	Upper Ohauti Landowners Group	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.
		79	0	Upper Ohauti Landowners Group	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.
		79	0	Upper Ohauti Landowners Group	38. There is an overall shortfall of housing in the sub-region of Western Bay of Plenty. Additional housing in urban areas will take considerable infrastructure to activate. This land is able to be developed with relatively minor infrastructure upgrades. Further work is required to understand the detail, however if the land is included in the Smartgroth strategy as a growth area this gives confidence to the landowners to continue to invest, and also signals to the Councils to consider it in their growth and infrastructure plans. 39. We are in a fortunate, but temporary situation where the major land owners are all in alignment as to seeing the land re-zoned to facilitate development. This enables the relatively rapid creation of 400 - 500+ homes and community infrastructure without requiring major upgrades to infrastructure. 40. Residential Development of the submission area does not affect horticulture or large areas of versatile soils, unlike most of the other areas focused on by Smartgrowth. 41. 3 waters services are able to be managed onsite or by simple upgrades to existing services 42. There is an important opportunity to provide an east-west roading link between Welcome Bay and Oropi that warrants further investigation. Otherwise roading upgrades are straightforward. 43. Additional vehicle traffic would be imposed on the local roading network, however this would occur overtime allowing upgrades to be investigated and made. 44. The ecological enhancement, already commenced by the landowners provides the opportunity for the community to establish an ecological precinct, or 'village' in an ecologically important part of the city. 45. Practically, it may be easier for the local government boundary to shift to incorporate the submitters land, however this seems academic as there are very few issues which require cross boundary invovlement.
		80	2	Hickson, Paul	Qualified support. Whilst I agree with the basic thrust of SmartGrowth, I don't think it has addressed the prospective growth in the region from Te Puke to Otamarakau/Matata in enough depth. Thus I think it is dangerous to draw firm lines around areas for 50 years at this stage. If the Rangiuru Business Plan proceeds then people will also want to live east of it as well as west. The coastal aspect and existing social infrastructure at Pongakawa make it an attractive place. Also the escalating coastal land prices at the Mount and Papamoa will make people search for more affordable coastal land. 1. further investigation of the Te Puke - Otamarakau / Matata area. 2. Rural Structure Plans should make specific reference to areas noted. 3. Final outcomes should have flexibility (it is a 50 year plan) 4. Cluster development could be a model to follow for the area Staff Recommendation: Reject

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		80	3	Hickson, Paul	<p>THE EAST</p> <p>SmartGrowth 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:</p> <p>Kiwifruit industry - we are the international leaders in this industry and over half the growth is happening in Te Puke and areas east of Te Puke. This requires a growing labour force and while large accommodation sites like Kiwi Corral and Bay Gold exist, encouraging a permanent work force who own their houses and feel part of a community should be the long term aim. Therefore rural villages should be allowed to evolve at Paengaroa and other places.</p> <p>Coastal living - many people enjoy coastal living. This is a fifty year plan so there are places from Pukehina to the East like Otamarakau and Rogers Road that are elevated and would offer great opportunity for small settlements.</p> <p>In considering the above it should be noted that the East offers:</p> <p>Employment - growing work force in kiwifruit and Rangiuru business park, in addition to normal growth.</p> <p>Social Infrastructure - schools both rural and in Te Puke, sports facilities at ED, Paengaroa, action centre at Pongakawa, swimming pools and sports fields at local schools. Te Puke - offers community arts, culture and sports clubs serving the whole district.</p> <p>Transport network - Rail from Kawerau and TEL in addition to other roading.</p> <p>Water - concern in the East about water flowing out of the catchment so this should cease and water kept for use by industries in the East.</p> <p>I am aware that Smart Growth has future plans for a city in the East in the Paengaroa or Business Park area. However this should not prevent natural growth in the rural housing and settlements to support the growing workforce.</p>
		81	10	Urban Task Force	<p>There is a need to deliver housing and business land in 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.</p> <p>The Smartgrowth Strategy must adopt a more enabling and fluid policy position to enable the delivery of residential and employment land based on a corridor approach. Key actions are required such as the ability to efficiently deliver and service land with respect to infrastructure. Sound engineering solutions which enable land to be developed should be applied and feasibility assessments must be required to ensure that ultimately the development of land is feasible in order to deliver housing. These are all actions that require inclusion in the Strategy.</p> <p>The "lead time to Development" identified on page 144 of the Strategy needs actions included in the Strategy to support a reduction in the development timeframes. Much of the delay is due to poor Council Plan Change and District/Regional consent processes. The need for urgent action and collaboration implicit in the Draft Strategy is not currently translated into delivery. Further actions are needed to require Smartgrowth Partners to sufficiently resource processes, and to offer fast track Plan Change and premium consent processing services. These Actions will greatly assist with the supply of land from Priority Development Areas identified in the Strategy.</p>

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		81	11	Urban Task Force	<p>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:</p> <ol style="list-style-type: none"> 1. Move Te Tumu 4,200 dwellings to 2027-2034, and 4,200 dwellings to 2034-2054 2. Move Tauriko West 2,000 dwellings to 2027-2034 and 1800 dwellings to 2034-2054 3. Move Keenan Road 1,000 dwellings to 2027-2034. 4. Add Wairakei south 2000 Dwellings to 2027-2034 and 2000 dwellings to 2034-2054
		81	2	Urban Task Force	<p>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.</p> <p>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.</p> <p>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.</p>
		81	4	Urban Task Force	<p>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.</p> <p>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.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		83	13	Bell Road Limited Partnership	<p>Wairakei South (previously referred to as Ottawa 2) was identified by Aurecon as having a yield of 600-650ha (assuming 70% nett developable yield from the gross site area due to the TEL through the spine and other land quality constraints including stormwater management). The area identified for business land is shown in Appendix (i).</p> <p>Bell Road LP has been liaising with the three Council's through its planning processes in relation to the Wairakei South land. Wairakei South has not properly been identified within the Draft Strategy. No provision has been made for Wairakei South in the short, medium and long-term table of housing supply assessment.</p> <p>Below is a summary of the work completed to date and the benefits of including the Bell Road LP site in the Strategy:</p> <ul style="list-style-type: none"> • 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.
		83	14	Bell Road Limited Partnership	<p>Bell Road LP seeks that Wairakei South be included in the Business Employment Land assessment in the strategy on page 149 through the following changes.</p> <ul style="list-style-type: none"> • Include 100ha of employment land in the 2027-2034 (medium term) and 45ha of employment land in the 2034-2054 (long term) planning periods. <p>Bell Road LP seeks that as well as employment land, provision for dwellings should be incorporated in the short, medium and long term residential growth allocations table on page 147 of the strategy as follows:</p> <ul style="list-style-type: none"> • Add Wairakei South 2,000 dwellings to 2027-2034, and 2000 dwellings to 2034-2054 <p>The Future Development Strategy Staging Map (Map 18) on page 154 should also be updated to provide for Wairakei South (and associated changes necessary to timing of infrastructure provision tables and associated staging maps).</p>
		83	6	Bell Road Limited Partnership	<p>Similarly the feasibility (both in terms of infrastructure provision, land cost and the NPS-Highly Productive Land assessment) of residential land of the Eastern corridor needs to be properly assessed, particularly given that this is high value kiwifruit land.</p> <p>Technical assessment and the public submission and review process is the mechanism by which areas should be identified or included within the Draft Strategy, through a clear and transparent process.</p>

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		83	0	Bell Road Limited Partnership	Based on the evidence of Peter Moodie and Ben O'Loughlin, I am satisfied that natural hazard, flooding, and geotechnical constraints associated with the site can be appropriately managed through relatively standard engineering" responses to the site. As identified in the evidence of Ben O'Loughlin, development of the land can occur in accordance with accepted engineering solutions and filling will enable the land to be above the 100-year flood level and clear of any Tsunami risk. 7.2 The evidence engineering and natural hazards evidence addresses the two outstanding points that were raised in the Phizacklea Report, which indicated that the submitter would need to provide in support of the site being included as a Priority Development Area in the SmartGrowth Strategy. 7.3 Although large areas are required to be set aside for stormwater management, I consider that this is a significant positive benefit of developing Wairakei South given that 99% of the wetlands within the Kaituna Catchment have been lost as a result of being drained and converted into farms. This is entirely consistent with Te Mana O Te Wai. 7.4 The sites attributes such as its proximity to the eastern corridor, the ability to gain access via the existing interchange, its connection to Te Puke and the TEL and the fact that it is a logical extension to the existing Wairakei settlement are all in my view positive reasons to include the site as an identified future development area. As noted in the evidence of Nathan York, one particular advantage of the site is the proven feasibility of being able to develop the site, given the low cost of the land. The feasibility of other land identified in the Strategy is questionable. 7.5 In my opinion, the inclusion of the land within the SmartGrowth Strategy as a future development area will further assist the subregion in achieving both residential and business land shortfalls which are not being met in either the short, medium or long-term scenarios.
		83	0	Bell Road Limited Partnership	Geotechnical investigations completed to date confirm that the site is subject to a number of geotechnical constraints and geohazards including consolidation settlement, liquefaction, embankment stability, and tsunamis. Based on the results of the preliminary assessment completed under my guidance, I consider that there are a number of appropriate, accepted and viable engineering solutions available to mitigate and / or manage the identified geotechnical constraints to accommodate the proposed future residential and employment zone land development. This conclusion is subject to the completion of further geotechnical investigation and engineering involvement through all stages of design, construction observation and certification of landform, buildings and infrastructure. A Natural Hazards risk assessment will be required in accordance with the Bay of Plenty Regional Council Regional Policy Statement.
		83	0	Bell Road Limited Partnership	Given the significant the shortfall of land in the sub-region for both future residential and industrial land, the SmartGrowth Draft Strategy should not be as prescriptive when identifying "preferred potential locations" in planning for business land demand needs Wairakei South Urban Growth Area for the sub-region. Limiting your future land development options, as done in the past, has already placed the sub-region under huge land supply deficit stress. 54. SmartGrowth needs to mindful that some of the sub-region's strategic transport corridor locations, e.g. western and northern corridors are subject to huge infrastructure costs, financing, design & consenting processes and/or actual construction. These elements will typically not be addressed in a timely manner, and therefore impacting on the likelihood (or unlikelihood) to unlock business land in these areas over a considered period of time. 55. SmartGrowth should continue to focus on urban development around known centres and existing transport corridors that are properly operational, therefore providing strong containment of transport movements and reduction across the wider regional transport networks. 56. The Wairakei South Urban Growth Area should be included as a future growth area for the sub-region, to deliver much needed employment and residential land. 57. If SmartGrowth continues with a preferred location list approach, then the Site needs to be recognised as one of the preferred potential locations outlined in the SmartGrowth Draft Strategy (page 149), from which further detailed assessment can be undertaken. 58. The site also qualifies as a Priority Development Area under the FDS for the sub-region.
		83	0	Bell Road Limited Partnership	On the basis of my preliminary assessment, potential solutions exist for urban development of the sites in terms of earthworks, flooding, stormwater, wastewater and water servicing. 9.2 I have reviewed the SmartGrowth Industrial Land Study reports, and in my opinion, many of the issues raised in the short-listing process have potential solutions, and the sites should therefore not be excluded from further investigation or short-listing.
		84	2	McMaster, Bill	1.6 This submission seeks that the SmartGrowth partners communicate with Tauranga City Council, as a key SmartGrowth partner, seeking TCC to remove the high density residential proposals from the Mount Maunganui North area which are included in TCC Plan Change 33 until the SmartGrowth partners have had an opportunity to assess what this development will do in terms of providing excess housing numbers in the Western Bay of Plenty sub-region and assess the adverse impacts of this proposed development on Western Bay of Plenty infrastructure implementation planning (and assessed in the SGS Implementation and Funding Plan).
		91	7	Sustainable Bop Trust	How Realistic is the Spatial Plan?

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		91	8	Sustainable Bop Trust	Eastern v Western v Northern Corridors
		92	2	Murphy, Vincent	<ul style="list-style-type: none"> • Would seek some clarity of direction on the FDS dealing with 'unanticipated' or 'out of sequence' development. o Could the key principles of the 'Connected Centres', along with other factors such as size, accessibility to transport networks, types of development to be enabled etc, be used in assessing the merits of future 'unanticipated' development that does not fit neatly with areas indicated as being planned or potential growth areas? • 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.
		92	0	Murphy, Vincent	Drawing upon the commentary above, it is firstly requested that Pongakawa be acknowledged as a location in-principle where some growth could occur to respond to distinct demand in that location, on whichever plan is to be the actual spatial plan. This could be reflected by use of the 'Potential Long-Term Growth Area' overlay indicated on the spatial plans to-date. See extract below, with green highlight for ease of discernment.
		92	0	Murphy, Vincent	Secondly, it is requested that consideration be given to the potential for signalling growth in a manner to consolidate Tauranga City further. I support the focus on brownfield development within existing urban areas, and acknowledge the widespread constraints and challenges beyond the current extent of Tauranga City that have been considered by the strategy work to-date. An opportune area where this appears to present itself is Papamoa (west of TEL) and back towards Welcome Bay.
		94	3	Katikati Community Board	It is critical that all of our communities have voice and local knowledge is listened to. For many years, a Strategic Partners Forum was successful. It afforded selected interest groups the opportunity to share local aspirations and knowledge, needs based assessments and well thought out ideas. The termination of the Forum was very disappointing and has resulted in a disconnection to industry sectors, communities and local knowledge. We are fully aware that Smart Growth is a planning framework only and approval and implementation processes for growth initiatives sit with the territorial authorities and central government. In our view, the Smart Growth strategy must be connected to communities and interest groups and their local knowledge. We urge you to re-establish the strategic partners forum and to listen to an abundance of local knowledge and ideas that will be invaluable in making sure we achieve the positive 5S's - Strategic, Sustainable, Serviced, Successful and Satisfied.
		94	4	Katikati Community Board	We support the plan to explore and potentially develop in the longer term a new 500+ settlement west of the Katikati township. In planning this development we must be mindful of the impact of rising sea levels due to climate change and the potential of a tsunami. It is better to plan correctly today rather than a managed retreat is say 50 or 100 years time." "This is a terrific opportunity for Smart Growth to impress upon central government the need for access to infrastructure funding. Smart Growth must establish a program for the Katikati region to deliver new housing in the township and in the rural settlements we have identified. With green lights instead of red and clearly defined pathways for swift progress, land owners and housing developers will act quickly. It should also be noted that this can be a sensible and balanced program of rural land conversion in sync with economic growth.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
SGS23-13: General	1: Support	15	3	Kenyon-Slade, M	The whole development proposal seems a commendable undertaking however it is clear world wide in countless examples that the acronym "No parking, No Customers, No Business! Is very apt.
		22	4	Van De Weyer, Callum	Very nice plan.
		38	1	Smith, Michael Geoffrey	Yes very good overall.
		48	5	Tauranga Business Chamber	We understand that this plan will inform future council planning processes such as city plans, social infrastructure planning, transport planning, local plans, and the annual plan and long-term plan. However, some local stakeholder groups may see this strategy as having more legal status. We're not focusing on the detail - this will happen through the appropriate processes. As a joint planning and directional tool, we support the overall direction of this document as it provides some direction to business' longer-term planning.
		59	1	Ministry Of Education	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.
		66	2	Golden Bay, A Division Of Fletcher Concrete &	GB generally supports the SGS overall vision and the four well-being objectives for the western Bay of Plenty sub-region growth over the next 30 years
		72	1	Nga Potiki a Tamapahore Trust	NPATT generally supports the proposed Environmental, Cultural, Social & Economic Objectives. Adopt the Objectives as notified.
		72	6	Nga Potiki a Tamapahore Trust	NPATT support the following opportunities relating to growth, the natural environment, cultural identity, and the economy. Adopt the listed opportunities as notified.
		73	7	Property Council New Zealand	8.1 Property Council broadly supports the direction of the draft SmartGrowth Strategy 2023-2073.
		75	1	Andrews, Julie	I am pleased to have the opportunity to submit on the Smartgrowth Strategy. I support the vision and objectives of the Strategy. I also largely agree with the transformational shifts identified by the Strategy, in particular homes for everyone, emissions reduction, restoring and enhancing ecosystems and changing the model for growth. I do not necessarily agree with the proposed "how" which is incorporated into transformational shifts 8.3 and 8.6 in the Statement of Proposal.
81	1	Urban Task Force	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.		

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		84	1	Mcmaster, Bill	1.4 Overall I applaud the SmartGrowth partners in producing a thorough, informative and well-presented Strategy that will serve the sub-region well over the next 50 years. 1.5 I support the Future Development Strategy and the overall implementation and funding plan.
		84	3	Mcmaster, Bill	1.7 I strongly support the SmartGrowth Strategy (SGS) as the pre-eminent growth management strategy for the Western Bay of Plenty sub-region. 1.8 I support the fact that the SmartGrowth (SG) partners have collectively produced a 30 year Strategy that sets the strategic vision and direction for the growth and development of the sub-region. This shows real leadership and a willingness of the partners to agree a plan for future growth. 1.9 I support the integration of land use and infrastructure within the SGS. 1.10 I support the Vision of the SGS "Western Bay - a great place to live, learn, work and play". 1.11 I support the four well-beings and subsequent objectives of Environmental, Cultural, Social and economic. 1.12 The SGS proposes 6 transformational shifts for change which I support. The first shift seeks 'Homes for Everyone' and it is around this shift my submission is based.
		90	1	Bluehaven Group	We support the fundamental intent of SmartGrowth Strategy 2023-2073 (SmartGrowth) which align closely with the long-term development aspirations for the planned Wairakei sub-regional centre (The Sands), the development of the surrounding Wairakei community, including development in Bell Road for industrial/employment land activities.
2: Oppose		4	1	Feisst, Doug	I cannot believe you paid someone to write 180 pages of dribble. No wonder the National party said that if they get into government there will be a slash and burn of consultants who dream up this crap. Would the average citizen read through all 180 pages and think wow, the council is certainly heading in the right direction. Can someone please write down what the council aims to do in the next 12 months, the cost of whatever is going to be done and who is paying, no use saying it's in the 15 year plan cause you wont be around then.
		4	2	Feisst, Doug	Get some local business people on board to give some direction. I thought one of the major concerns would be sorting out down town Tauranga. Its like a ghetto.
		5	1	Goodley, Wayne	Growth is not in anyway a contributing factor in sustaining life style and most especially our natural environment. Our focus should be one of mindfulness of NOW. Our plan should be to address the issues of a small but beautiful region and city NOT GROWTH. If we cannot fix our today issues we most certainly will not solve them with growth and predictable costs both economic, enviornmental AND life style.
		6	8	N/A, Linda	I don't think the Council is for the people it is supposed to be representing
		8	4	Goodall, Andrew David	By the current state of our roading and infrastruture this group has proven they are are waste of time and ratepayers money. Consider disbanding please. You state you didntknow about the population increases yet pushed (advertised) the subdivisions at the lakes, Omokorao and Papamoa but nothing was done to improve the roading, if anything it has gone backwards. Remove all tolls on our roads and get fibre into more rural areas. Get proper intersections now at Omokorao and Tauriko/Cambridge Rd. Remove Tolls. Get Tauranga back to democracy.
		17	7	Pirere, Tania	DON'T LET FORGERIES AND TE AWARA TAKE OVER MAKETU
		21	1	Wilson-Jenks, Wendy Ann	I don't feel confident at all in your plan, unsmart growth!! Living in Omokorao it is painfully obvious that the infrastructure is unable to cope with the housing that is already under construction that you have given i.e. roading and other facilities. Why don't you concentrate on your core council duties such as roading and infrastructure - since when did it become your core business to build housing for people who have not provided for their own future??
		28	3	Thorpe, Andrew	Growth is synonymous with, at best, increased unsustainable demand on ecosystem services and at worst, environmental destruction. While except that at a local level, growth is inevitable in Tauranga, we must cease to portray growth as in any way positive. It is only a cost, both to the current population and to future generations.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		40	3	Buhrs, Nicole	The kind of development that Smart Growth Strategy is proposing is money driven, not people driven. That is what is wrong. I also can't believe that it talks about more roads for more cars. Even if people get more hybrid cars and EVs, if they still use their cars to move around, more roads and carparks will be needed as the population increases. More people need to live in the city centre. The main shopping streets like Devonport Rd and Grey St could be rebuilt with at least 3 storey buildings with 2 storey apartments on top of shops. That would make a vibrant and revitalised city centre and provide more houses.
		41	1	Mollison, Margaret Helen	We have lived in Tauranga for over 20 years, and in that time, it appears that development has been led by developers in an ad hoc fashion. Clearly, a greenfield growth model is the modus operandi, with little thought for sustainability, long term planning, integrated public transport and community wellbeing, but would seem to be the easiest route for maximum profits. For a sustainable future, for a functional and well-planned city that stops spreading onto arable land and meets the needs of its inhabitants over the next 30 years, this pattern needs to stop. The council needs to take the lead in all future development so developers are required to conform to established guidelines set down by the council in a consistent, integrated, and planned process. We need time to do this well and we need urban planning that is consistent with this vision. In other words, not the tail wagging the dog, but the other way around.
		41	2	Mollison, Margaret Helen	There is confusion around several documents outlining future plans for the region and the intensification that is intended eg Smartgrowth, UFTI, the Transport System Plan. It would be good to rationalise these documents into a united framework with consistent figures. This would be a good start for future planning. We need robust integrated assessments with enough time for thorough public consultation, well informed urban planning, geotechnical analysis, a clear review of transportation options, with acknowledgment of Papatuanuku, using up to date best practice. A suggested framework for this is sustainability and a good quality of life for all.
		42	18	Gordon, Carole	The draft strategy does not inspire people to take part in shaping environments for a sustainable future. More roads to more houses without highly engaged communities misses the demographically aligned place-making environment that is vital to secure economies, the social contract and social cohesion as a cornerstone to the longevity dividend and wellbeing for all.
		42	19	Gordon, Carole	No I do not feel confident. It is a big task - planning so far ahead is unrealistic * My philosophical view is that more population detail is required to focus the strategic parameters. * It is vital that we plan for who our people are and for the environment. We do know who our people will be - this should guide the urban footprint or built environment to create suitable liveable communities, A different view shaft from Connected Centres which is actually roads! * The assumed 'growth' scenario is unrealistic given global population ageing, workforce decline and increasing geo-political tensions.
		42	22	Gordon, Carole	Growth is unsustainable - rapid urban growth creates poverty. New Zealand urban growth story tells us that this is so. Please initiate discussion on intensification urban planning models such as the Madrid square, Please include a tree planting strategic plan - one house = one tree.
		44	1	Conlon, Bruce Nicholas	It seems that welcome bay is still the "Forgotten Suburb"
		45	4	Liddell, Alan Alexander	I used to come into town from Bethlehem for lunch or breakfast regularly. Now I never do. I used to eat at downtown restaurants. Even though parking at night is easy, I am more likely now to go a restaurant at the Mount or here in Bethlehem as the Council is killing the central city and it is becoming less safe. I only now come to the CBD to attend my gym in 1st Avenue and, because I am already there, to shop at PaknSave and clear my PO box in 6th Av. Were it not for the gym (which I attend for the trainer there, not because of the location), I would switch my PO box address to Bethlehem, attend Aspire gym at Bethlehem and shop at PaknSave at the Lakes. The parking is better at the Lakes, anyway. I do not want to speak to this as I think I would be wasting my time but you asked for transport feedback and I have the time to type a rant.

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		53	1	Bowden, Beth Willard	In my view the likely effects of global conditions-change (the "Global context", pp. 28-29) on economic projections that underpin this Strategy are insufficiently accounted for. The continuing assumption seems to be that growth will pay for growth and that markets can and will indefinitely adjust, in their infinite nimbleness and flexibility, to changing circumstances. The history of the industrial revolution (to offer a modern example) shows us that, absent other extrinsic pressures, both producers' and consumers' enlightened and immediately proximate self-interest tend to prevail. <ul style="list-style-type: none"> • 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
		54	13	Robson, John	Multiple lists of 'challenges', 'outcomes', 'directives', etc. are not a strategy... There is too little evidence to give me confidence that the aforementioned lists have been through a/any process that might produce a coherent and, more importantly, viable strategy that will ensure an environmental and economically sustainable future for the sub-region... Sadly, this failure, given my knowledge and experience of SmartGrowth, comes as no surprise. That said, and to be fair, I don't know whether such a future for the sub-region is even possible given the fact that any strategy for the sub-region is, literally, subject to the strategy (and consequent/subsequent statutes, policies and frameworks) of central government. And, as locally, there is little evidence that the government of NZ has been, or is currently, both willing and able to develop and deliver an environmental and economically sustainable future for our country.
		60	3	Tangata whenua collective /CTWE	The consultation process on the draft Strategy was too short.
		61	9	Child Poverty Action Group	A Way forward ? We are looking for a long term vision and plan to provide a new way forward, the Strategy is not enough. More intensive urban developments are a way forward but must be affordable. Good planning is required to provide quality low cost intensive housing that still provide privacy and useable outdoor spaces and shared facilities. We may need to look overseas for examples, such as Rightsizing Scheme - Cork City Council. Such developments should be within the existing urban footprint. If well done we believe quality intensive developments in existing urban areas would be preferred over long commutes to expensive traditional homes on tiny sections. SmartGrowth could provide a lead here. Opportunities exist to work with Tangata Whenua to find specific solutions. In the UK almost 1/3 of new homes are built by Housing Associations which then provide Social Housing, shared ownership plans, supported and specialist housing, market homes to rent and market homes to buy. We need to come up with a plan that works with and for people.
		65	1	Te Puke Economic Development Group	Smart Growth should encourage economic and social continuity and good planning for sustainable growth. Not more and more people that will negatively impact lifestyle and wellbeing. Not growth that is at odds with sustainability. Not growth for growths sake. Rather, growth that is beneficial for all of the communities of the Western Bay of Plenty sub region.
		66	10	Golden Bay, A Division Of Fletcher Concrete &	GB considers that additional wording should be inserted to recognise that industrial activities are an economic opportunity for the region. Amend the penultimate bullet point on page 40 as follows: Building on the sub-region's economic advantages - the Port of Tauranga, horticulture, food production, industrial activities and technology.
		66	9	Golden Bay, A Division Of Fletcher Concrete & Infrastructure Ltd	GB considers that additional wording should be inserted to recognise that industrial activities also require shipping links to and from the Port of Tauranga. Amend the following 'Marine corridor' as follows: ? Shipping links to and from the Port of Tauranga for freight, industry and tourism ? Aquaculture ? Recreation

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		75	15	Andrews, Julie	I would like to see the mindset change from growth to sustainability and optimisation. I would like us to concentrate on optimising what we already have here, and in so doing, look after our existing communities. Yes, we have to provide for growth but let's not make it worse than it has to be. The more we can slow down growth, the more chance we have of being more sustainable, of shoring up our resilience and reaping the benefits listed in the Strategy at page 15.
		77	1	Socialink	<p>'Vision' should be revised to reflect contemporary perspectives</p> <p>The current Smartgrowth vision is 'Western Bay - a great place to live, learn, work and play.' (pg 16). With respect, this does not present as a vision reflecting contemporary and likely future aspirations. It seems outdated and bland. 'Great' for example, can be defined in a myriad of ways. It also focuses only on human expectations and activity, with no reference to how humans are part of the natural world, and that our activity impacts on the climate, nature, wildlife and the general environment to their and our detriment.</p> <p>We acknowledge the strategy seeks to address the four Local Government Act wellbeings (environmental, social, cultural and economic). However we think the vision itself should be more in step with contemporary concerns such as sustainability, protection of our environment, equity, inclusiveness, and health. Visions are important, they underpin the heart of our thinking, feeling and action. Below are some examples of what other regions' future plans include in their vision elements which we think are more on track:</p> <ul style="list-style-type: none"> • '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) <p>It would be valuable to incorporate the values expressed by tangata whenua on pg 61 of the Strategy into this region's vision. The values expressed are</p> <p>"Manaakitanga - respect and care for others: We build warm and affordable homes and communities for all socioeconomic backgrounds. We also are good ancestors who plan and make decisions for our mokopuna and future generations.</p> <p>Kaitiakitanga - environmental responsibility and reciprocity: We are dependent on the natural world for their well-being and survival and therefore have a responsibility to care for and protect the environment in return. We are good ancestors who leave the natural environment in a better state for our mokopuna and future generations. Environmental reciprocity involves moving away from an exploitative mindset and creating a more balanced relationship between human activity and nature to ensure the health and wellbeing of all."</p> <p>These values will also resonate with many people who are tau iwi, 'reflecting the interconnectedness between people, place and space and recognising the need for a healthy environment for future growth that is responsive to the concerns and aspirations of tangata whenua.'</p>
		80	6	Hickson, Paul	<p>SmartGrowth must consider the loss of urban space and sun robbing in its residential planning. It must also recognise that our valuable coastline and ocean adjoining the Bay of Plenty has to be protected. The importance of BOP Regional Council and our rural sector through Fresh water Farm Plans and planting initiatives must be noted.</p> <p>My family have been ratepayers at the Mount since 1976. I made a submission in opposition to Plan Change 33 as did many others. Smart Growth should look carefully at the summary of these submissions rather than plan on what Central Government requires under Plan Change 33. Planning for 50 years requires community buy in and those who live and invest in communities should be treated as the most important.</p> <p>What ever Smart Growth comes up with in its final plan there has to be flexibility so that Councils may consider new ideas instead of referring to their rule bule. A good idea, after community consultation and approval, should never be cast aside because of decision makers hiding behind Smart Growth.</p>

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		83	1	Bell Road Limited Partnership	The Draft Strategy in its current form has failed to provide a guiding framework to deliver the necessary housing and employment land outcomes needed for the sub-region. This situation has resulted in significant underperformance of housing and business land supply across the sub-region and an affordability crisis. Tauranga now faces unprecedented housing and business land supply issues, and under the National Policy Statement - Urban Development (NPS-UD) a more coordinated planned and integrated approach is required to dealing with growth management. The ineffectiveness of previous SmartGrowth Strategies has occurred due to a failure to focus on "Growth Management", to work more closely with the development community to provide practical advice about what factors affect the feasibility of development such as land cost, construction cost, infrastructure, realistic development timeframes and robust construction methodologies.
		87	10	Ngai Tukairangi Trust	- The consultation process on the draft Strategy was too short.
		91	12	Sustainable Bop Trust	Please Slow Down!
		91	17	Sustainable Bop Trust	Does the strategy adequately take into account new technology and AI?
		91	2	Sustainable Bop Trust	The Overarching Goal of SmartGrowth SmartGrowth should encourage sustainable economic and social continuity, as well as managing growth to ensure optimal social and environmental outcomes. It should not effectively be a growth plan to attract more and more people to our city and sub-region, in a way that negatively impacts people's lifestyles and wellbeing, and further depletes natural resources and damages the environment.
		91	30	Sustainable Bop Trust	25. In other words, is this a sustainable strategy? 26. If the answer is no, then why move forward with this Strategy? Why not change it?
		94	2	Katikati Community Board	Smart Growth should encourage economic and social continuity and good planning for sustainable growth. Not more and more people that will negatively impact lifestyle and wellbeing. Not growth that is at odds with sustainability. Not growth for growths sake. Rather, growth that is beneficial for all of the communities of the Western Bay of Plenty sub region. "
3: Transformational shifts		42	11	Gordon, Carole	Strategy 2023 is the opportunity to embrace the collaborative knowledge needed to overcome the disturbing social and economic divide that stresses people and the planet. The Strategy declares that transformative shifts will guide what and how to do things differently (p58). Further it notes that rapid population growth has resulted in negative impacts (p137) such as housing affordability, transport congestion, and shortage of industrial land. This analysis does not unfortunately include the very deep and evident social stress and inequalities. The Strategy does not sufficiently examine the social, cultural and environmental impact of growth on tangata whenua.
		42	2	Gordon, Carole	The Strategy identifies six 'transformational' shifts (p18). However, it omits a comprehensive position on three vitally significant structural planning contexts: <ul style="list-style-type: none"> • Responding to the demographic transformation • Developing sustainable hyperlocal '15minute' communities. • Intergenerational cost of growth assumptions.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		57	1	National Council Of Women Tauranga (Ncw)	<p>1 Include Population Change as a key challenge.</p> <p>2 Include more detail on a strategic approach to:</p> <ul style="list-style-type: none"> • 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. <p>3 Give attention to, and seek to better integrate the actions of: The Governments' Better Later Life Strategy 2019 -2034.And Age -friendly Urban Places Guide.</p> <p>4 Adopt and apply the UN Decade of Healthy Ageing Guiding Principles as a basis for strategic planning. (attached)</p>
		59	2	Ministry Of Education	<p>3. Part 1 - Vision, Objectives and Transformational Shifts</p> <p>The Ministry supports the Smart Growth vision that Western Bay is a great place to live, learn, work and play. In particular the Ministry is supportive of social and community well-being being at the heart of planning for growth in the Western Bay of Plenty sub-region. The accompanying objectives which address environmental, cultural, social and economic well-beings are also supported. The Ministry is broadly supportive of the identified transformational shifts which will guide the priorities in the Implementation Plan. In relation to Transformational Move 6 (Radical change to the delivery, funding and financing model for growth), the Ministry has a particular interest in exploring options for shared service models for social and community infrastructure. Relief sought: Retain the vision, objectives and transformational shifts as notified.</p>
		62	2	Envirohub	<p>We note that the Social Objectives do not include any focus on people. This should be developed and include a statement on equitable outcomes. Whilst the trickle down theory does not appear to work, a rising tide does most certainly lift all boats (except perhaps the Rena?!)</p> <p>Challenges and Opportunities and Transformational Shifts:</p> <p>The deteriorating state of our Environment and the Loss of Biodiversity have not been noted as a challenge. We ask that this be included specifically as the environment and its limits are the base on which the strategy is built. The more we compromise the natural environment the less likely we are to have either a thriving society or a flourishing economy.</p> <p>Opportunities should not only include cultural environmental aspirations but should note the high level of active awareness there is of the natural environmental from most of our citizens.</p> <p>The Transformational Shifts as concepts are supported. The trick will be to consciously ensure that the shifts really are implemented and are not subsumed into 'business as usual'.</p>
		71	5	Zespri International Limited	<p>We note Business NZ's call for the government to use a wide range of funding mechanisms to get better quality infrastructure more quickly and allocate risk and cost7.</p>
		72	3	Nga Potiki a Tamapahore Trust	<p>NPaTT supports the principles Nga Wai ki Mauao me Maketu.</p> <p>However, it notes that Nga Potiki has significant maunga and other landmarks within its rohe.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		73	1	Property Council New Zealand	<p>4. 'Transformational shifts'</p> <p>4.1 Property Council welcomes the intent behind many of proposed 'transformational shifts' for the region and wishes to thank SmartGrowth for their work to date. The draft SmartGrowth Strategy currently identifies six 'transformational shifts' for change, which are intended to provide guidance when it comes to implementing the SmartGrowth strategy.</p> <p>4.2 The proposed 'transformational shifts' are:</p> <ul style="list-style-type: none"> I. Homes for Everyone II. Marae as Centres and Opportunities for Whenua Maori 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. <p>4.3 We believe that there are additional factors that should also be taken into account for the 'transformational shifts' in the finalised SmartGrowth strategy. Property Council recommends that SmartGrowth undertakes work to further refine the 'transformational shifts' for change.</p> <p>4.4 For example, greater consideration of access to public amenities and by extension the development of thriving communities. Access to public amenities and community has been affected by historic underinvestment across the region, and in our view, should be considered with the 'transformational shifts'.</p> <p>4.5 We recommend expanding the proposed eco-system 'transformational shift' to include environmental and climate resilience, especially in light of this year's extreme weather events. Furthermore, we note the ongoing economic imperative to protect the region's highly productive land within the proposed shifts and wish to also see this incorporated within the framework.</p>
		73	5	Property Council New Zealand	<p>The draft SmartGrowth strategy sets out timing for growth-related infrastructure required to support urban growth areas over time. Property Council notes that numerous projects are either partially funded or not funded. Property Council recommends that SmartGrowth and its partner Councils undertake work to develop viable and alternative approaches to funding and financing for growth-related infrastructure.</p> <p>Property Council advocates for the use of transparent, beneficiary pays alternative funding models for local government, especially in terms of delivering critically needed infrastructure. Examples of these models include targeted rates, user-pays systems, and Special Purpose Vehicles ("SPVs") as enabled under the Infrastructure Funding and Financing Act ("IFF"). In particular, we strongly support use of the IFF Act to fund infrastructure and investment. We have previously championed Tauranga City Council's use of the IFF Act for other projects, such as the Transport System Plan or Civic Precinct. Ultimately, this approach makes the cost of new infrastructure more transparent, improves intergenerational equity by spreading the cost over a sustained time period and also unlocks additional infrastructure investment.</p> <p>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.</p>
		75	13	Andrews, Julie	<p>Air pollution (refer transformational change 8.5)</p> <p>There is also the serious issue of pollution which needs to be addressed, namely the air shed at the Mount. I would have expected options in the Strategy to move the polluting industry away from schools, marae and residences.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		75	2	Andrews, Julie	<p>8.3 - Emissions reduction - I question whether this can be achieved through the proposed Connected Centres</p> <p>• 8.6 - Change to delivery, funding and financing model for growth - I believe this should be done through government funding, not PPPs. PPPs have proved financially disastrous in other parts of the world (eg the UK). Refer 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:</p> <p>This briefing sets out major problems and risks the UK has encountered through its extensive experiment with PPPs, including how they have;</p> <ul style="list-style-type: none"> - 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 - Enable 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 <p>PPPs are hugely unpopular in th UK, with 68% of respondents to a survey in England saying PPPs should be banned. In Scotland, which has a higher proportion of projects per person, 76% of responents say they should be banned. This unpopularity has led to PFI being rebranded in both England and Scotland (see section 5 on page 7)</p> <p>Emissions reduction is critical. As is noted in the Strategy, climate events are changing the way we live. Climate change is accelerating at rate that is surprising (and terrifying) even the experts. It follows from this that everything we do needs to be first viewed through the lens of climate mitigation and adaptation. Two of my primary concerns are that:</p> <ol style="list-style-type: none"> 1. the Connected Centres model in association with greenfields development is not the best option to achieve the objectives of the Strategy. In particular there is no evidence that implementing the Strategy will result in the large reductions in carbon emissions that arerequired. We need an evidence-based carbon emissions analysis to make informed decisions. 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.
		78	3	Clear The Air & Tauranga Moana Fumigant	<p>15. We note the Transformation Shifts and consider that resolving Mount Maunganui Airshed pollution has to be a priority that is at least equal to those identified, because it addresses real human health risks.</p>
		81	12	Urban Task Force	<p>Transformational Shifts</p> <p>The Urban Taskforce agrees with the use of the transformational shifts which are identified for change and which provide guidance when implementing the strategy. The transformational shifts are identified as:</p> <ol style="list-style-type: none"> 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. <p>Although the Urban Taskforce supports the six principles relating to transformational shifts we consider that the Strategy should also incorporate a seventh shift, this being the need for further social infrastructure such as public and community amenities to be recognised. The reason for this is that there has been significant underinvestment in such infrastructure by successive Councils in Tauranga, and the city remains in "catch up mode". The Strategy needs to address this.</p> <p>Funding and Financing of Growth</p> <p>The Urban Taskforce strongly supports the need for radical change to the delivery funding and financing model for growth. A range of different funding and finance models must be identified within the strategy including options for public-private partnerships. The Urban Taskforce also supports the use of the Infrastructure Funding ad Finance Act with respect to the funding of infrastructure. Tauranga City Council has successfully used this Act for other projects which is a much fairer and efficient approach to infrastructure funding and one which spreads the cost over a sustained time period improving intergenerational equity and unlocking additional infrastructure investment.</p> <p>Greater Central Government investment is also required to enable the development of infrastructure and further policies should be incorporated within the strategy to promote Central Government funding of infrastructure through a partnership arrangement as an important funding option.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		83	3	Bell Road Limited Partnership	<p>Transformational Shifts</p> <p>Bell Road LP supports the transformational shifts for the region as set out in the Draft Strategy, which are as follows:</p> <ol style="list-style-type: none"> 1. Homes for Everyone 2. Marae as Centres and Opportunities for Whenua Maori 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. <p>However, we consider that there is also a need for the inclusion of social infrastructure/public amenities to be included as a transformational shift, as there has been significant underinvestment in Tauranga.</p>
		91	29	Sustainable Bop Trust	<p>23. Will growth ever pay for growth? e.g. Are higher DCs or IFF used for new greenfields?</p> <p>24. If not, how will we afford the infrastructure to cater for all this extra growth? (We already have the highest rates of any NZ city and increasing elder poverty.)</p>
		91	3	Sustainable Bop Trust	<p>Funding</p> <p>The reality is that we have had much the same growth strategy for 20 years. Some things have been implanted, others haven't. It always comes back to funding.</p> <p>Why does this Draft Strategy not contain a funding plan? It is only really a Strategy if it's a funded plan - otherwise it's just another document that will sit on a (virtual) shelf until it is funded.</p> <p>More specifically on this issue, the Draft Strategy states (p 159): Central Government has introduced tools to assist with the delivery and funding of urban development. This includes the Infrastructure Funding and Financing Act 2020, the Urban Development Act 2020, the Housing Acceleration Fund and the Maori Infrastructure Fund.</p> <p>That wording is misleading. The Infrastructure Funding & Financing Act is a means of securing higher-cost financing for 'off-the-books' debt. It is still funded by ratepayers, who still have to repay the debt - paying higher interest charges than for Council loan-funded debt.</p> <p>TCC itself stated: "Council has looked to the Infrastructure Funding and Financing Act (IFF) to help with some of these balance sheet constraints but the cost of this also falls on the ratepayer. The impact of inflation and rising interest rates on the cost of living for our communities mean that there is limited room for rate rises or additional IFF levies (our ratepayers have constrained financial capacity, and many are already struggling with cost increases)."</p> <p>That is the key point. Financing debt is a minor problem. As TCC indicated, the key issue is funding of debt. The focus needs to be on who pays for growth. The reality is that TCC residential ratepayers will next year be paying an average of roughly \$1000 rates just to finance the interest on the official Council debt. Let alone another chunk of money to start paying off the IFF Transport levy. Much of that debt relates to growth.</p> <p>What's more, we read that Tauranga City ratepayers will have a debt of \$0.735 billion by 2045 just for growth in Papamoa East-Te Tumu unless we start repaying the debt next year. Growth has not and will not pay for growth unless we change the model!</p> <p>IFF and PPPs are not the answer. We need to have a mature, comprehensive, informed conversation about this issue across all our communities. And we need to make a sustainable democratic decision about this important matter.</p> <p>The Need for Up-Front Infrastructure to Support Intensification If high-density development is enabled, we have serious concerns about the lack of funding for infrastructure. This could severely compromise the quality of the outcomes of Plan Change 33. We think the SmartGrowth partners need to 'seize the day' and push back more strongly at central government for wanting existing residents to largely fund its growth agenda. Tauranga needs more funding now, especially for public housing and public transport.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
4: Implementation plan		42	7	Gordon, Carole	There is a stated strategic urgency to "do things differently." What does the Strategy really do to advance enhanced urban ecosystems? The Strategy acknowledges that there is a need to "do things differently." It is not at all clear how it will "collectively address the big challenges," (p14) to find solutions to overcome issues such as: <ul style="list-style-type: none"> • Increasing social inequity and chronic homelessness. • Provision of homes for an ageing population. • Implementation of discretionary zoning • Integrating health and social care in infrastructure planning to improve equity and access and health status. • Climate and heat mitigation by greatly increased tree planting in multigenerational green space urban environments • Diminishing social cohesion.
		48	1	Tauranga Business Chamber	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.
		48	4	Tauranga Business Chamber	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.
		53	10	Bowden, Beth Willard	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?
		53	2	Bowden, Beth Willard	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? <ul style="list-style-type: none"> • What assumptions have been made about central government's ability or willingness to fund more of the growth that is policies (particularly immigration into the north of the North Island) have created? • 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.)
		53	22	Bowden, Beth Willard	As with economic development in general, implementation, funding and financing are the missing fundamentals in this part of the Strategy.
		53	27	Bowden, Beth Willard	In general, without a Funding and Implementation Plan, how can those trying to meet these strategic ambitions sort out their priorities?

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		59	17	Ministry Of Education	It is noted that the Implementation and Funding Plan for the FDS (and the wider Strategy) will be developed in accordance with the NPS-UD requirements. The Ministry acknowledges the strong partnership and collaborative approach to growth planning that has been undertaken by Smart Growth over the last 20 plus years and looks forward to working with the Smart Growth partnership in the development of the Implementation and Funding Plan. The Ministry also looks forward to being involved in more detailed planning for priority growth areas such as through local spatial and structure planning.
		62	1	Envirohub	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.
		64	2	Classic Group	<p>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:</p> <p>Expertise and Experience: Developers, especially those with a significant track record like Classic Group, bring invaluable expertise and experience to the table. Understanding the intricacies of land development, market dynamics, and infrastructure requirements, developers can offer practical insights that are essential for formulating realistic and achievable strategies.</p> <p>Market Responsiveness: Developers operate at the forefront of market demands. Their involvement ensures that the strategies devised are not only visionary but also responsive to the immediate and evolving needs of the community. This market-driven approach is crucial for creating sustainable, market-oriented developments that align with the region's growth trajectory.</p> <p>Fostering Public-Private Partnerships: Collaboration between the public and private sectors is fundamental for achieving comprehensive and sustainable development. Developers can act as strategic partners, contributing resources, expertise, and funding to complement public initiatives. Such partnerships can amplify the impact of SmartGrowth initiatives and ensure their long-term viability.</p> <p>Focus on Priority Development Areas (PDAs): Developers, particularly within Priority Development Areas, are instrumental in unlocking the potential of these strategic zones. Their active participation in PDAs increases the likelihood that development occurs at the required pace and scale, aligning with the overarching goals of SmartGrowth.</p> <p>We emphasise the need for sustained collaboration between SmartGrowth and private developers, especially within Priority Development Areas. We are prepared to contribute our expertise, resources, and insights to ensure the success of these strategies.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		67	7	Ford Land Holdings Pty Ltd	<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.
		68	7	Tumu Kaituna 14 Trust	<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.

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		73	6	Property Council New Zealand	<p>7.1 The future success of the SmartGrowth initiative will depend on the ability of SmartGrowth partners to effectively implement the proposed strategy. It is critical that effective long-term planning translates to practical outcomes, in terms of factors such as infrastructure provision, land supply or transport. Historically, the Bay of Plenty region has struggled at times to effectively implement past SmartGrowth strategies.</p> <p>7.2 Effective implementation will require SmartGrowth partners to clearly enshrine the proposed SmartGrowth 2023-2073 strategy into their approach to matters such as Long-term Plans, Annual Plans, and other key plans and policies. Given the timeframe on which the proposed SmartGrowth strategy operates, it is also important that implementation is durable across political cycles to ensure certainty across the region.</p> <p>7.3 There is a clear relationship between planning outcomes in the Bay of Plenty region and planning outcomes in the Waikato. Effective alignment between both regions is vital for meeting our economic, social and environment objectives. Property Council recommends that SmartGrowth should co-ordinate and collaborate with Future Proof in the Waikato.</p>
		77	2	Socialink	<p>While we understand the Strategy sets high level direction, in some ways the Strategy may be overemphasising high level broad challenges in comparison to what can be done. Many of its opportunities on page 40 are at a high level rhetorical statement - 'encouraging', 'creating' 'enhancing'. 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.</p>
		81	13	Urban Task Force	<p>Large areas of employment and residential land (such as at Te Puke and elsewhere) are unable to be unlocked due to the inability of District & 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.</p> <p>There are many other examples across the sub-region where the Partner Councils must start working more collaboratively in a partnership role, in anticipation of amalgamation & combined services (i.e., combined water services, and a combined Regional Planning Committee) as this appears to be something the new government will encourage.</p> <p>Reviewing delivery and cooperation between the Partners and their performance should also be a key requirement.</p> <p>These actions should be included in the Implementation and Funding Plan.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		81	3	Urban Task Force	<p>SmartGrowth is often criticised for its lack of delivery. There is a real opportunity to improve delivery of the Strategy through better engagement and collaboration with the development sector. There are a number of actions which should be incorporated within the Strategy in relation to the development sectors involvement which also reflect the requirements of the NPS-UD. These actions are as follows:</p> <ol style="list-style-type: none"> 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.
		81	6	Urban Task Force	<p>Engaging with the development community after the completion of the bulk of the technical work will miss key information and opportunities and is a recipe for future conflict and rework. This should be included as a key action in the Implementation and Funding Plan. In the interim, all commercial centres identified through Spatial Plan processes or existing District Plan Centre Network maps should be included on Page 104 of the strategy.</p>
		81	8	Urban Task Force	<p>Beyond the identification of industrial business land capacity, there is a need to align zoning and plan provisions with the National Planning Standards. This work still needs to be completed and the review needs to involve the Bay of Plenty Regional Council to address integration between land use and the Regional Plan provisions for air and water quality. At present this is occurring in a piecemeal manner and is creating inconsistency and significant delays in delivery at the time of plan change/significant consent processes. The review needs to be based on collaboration with the development community from conception to completion. Engaging with the development community after completion of the bulk of the work is a recipe for conflict and rework. Again, this is a key action that should be included in the implementation and funding plan.</p>
		83	11	Bell Road Limited Partnership	<p>Industrial Strategy Review</p> <p>Beyond the identification of industrial capacity is the need to align zoning and plan provisions with the National Planning Standards and these include:</p> <ol style="list-style-type: none"> 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 <p>The review needs to involve the Bay of Plenty Regional Council to address integration between land use and their regional plan provisions for air and water quality.</p> <p>At present this is occurring in a piecemeal manner and creating inconsistency and significant delays in delivery at the time of plan change/significant consents. The review needs to be based on collaboration with the development community from conception to completion. Engaging with the development community after completion of bulk of the work is a recipe for conflict and rework. Again, this is a key action that should be included in the Implementation and Funding Plan.</p>

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Topic	Issue	Sub ID	Sub Point	Name	Summary
		83	4	Bell Road Limited Partnership	<p>Role of Developers in the SmartGrowth Partnership</p> <p>The role of the development community (including organisations such as Bell Road LP and its Shareholders) is critical to the success of the implementation of the SmartGrowth Strategy, and there is currently very little in the way of policy directive within the Draft Strategy which requires the SmartGrowth Partners to work collaboratively with the development community.</p> <p>The Draft Strategy provides limited recognition that it is actually developers that will lead the delivery of much of the strategy apart from the "lead time to development" diagram on page 144. This is the most explicit reference, but even here the developer's role is largely referred to as being related to "subdivision and building consent".</p> <p>The reality is completely different. Developers have a significant role in long term planning, working in close collaboration with the Councils and other providers to deliver urban outcomes from the early inception of the planning process. The importance of the role of developers is also very clear in the National Policy Statement - Urban Development (NPS-UD), which requires that Tier 1 Councils must:</p> <ol style="list-style-type: none"> 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. <p>This mandated role of developers needs to be clearly identified as a minimum in the Draft Strategy. The Draft Strategy needs to be revised to include clear provisions that identify and recognise the significance and importance of much of the growth in the subregion being developer led, including the identification of land suitable for development and subsequent Plan Change or Fast Track consent processes for significant processes. It is noted as an example, that there is no recent track record of significant Council led plan changes in Tauranga over the last 10 years, with all significant Plan Changes being developer led.</p> <p>Without developer confidence and investment, the actions from SmartGrowth are unlikely to be realised. SmartGrowth is often criticised for its lack of delivery. There is a real opportunity to improve delivery of the Strategy through better engagement and collaboration with the development sector through several measures including:</p> <ol style="list-style-type: none"> 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.
		84	9	Mcmaster, Bill	<p>1.33 Part 5 Implementing the SGS. It is noted in this part of the SGS that the Implementation and Funding Plan (IFP) will be developed as a separate document and updated annually. It is not part of the FDS under the NPS-UD.</p> <p>1.34 It is submitted that the TCC PC33 proposal on high density at Mount North be fully costed under the IFP to assess whether the SM partners are in a position to be able to fund the infrastructure components relating to the increased dwellings allowed under the PC33 Mount North high density intensification proposals.</p>
		85	3	Tauranga Crossing Limited	<p>16. While TCL acknowledges that the Strategy identifies that "further work is required in terms of developing a detailed sub-regional commercial centres strategy" that will form part of the Implementation Plan supporting the Strategy, the Implementation Plan is not part of the FDS and is not subject to the consultation and engagement requirements of the Local Government Act 2002; nor does not have the effect of an FDS when Councils are preparing or changing RMA planning documents.</p>
		86	14	Ngai Tukairangi Hapu Trust	<p>Ngai Tukairangi hapu lack capacity and capability to input into the myriad of planning strategies in our Funding for the development of a spatial / environment management plan rohe. We propose to secure funding of \$250,000. This is a significant step toward fostering a synchronized approach within Matapihi. This initiative aims to align various efforts and initiatives under a unified strategy that truly represents the aspirations of Ngai Tukairangi hapu. The ultimate objective is to create a Matapihi-led, Matapihi-driven approach that addresses the unique challenges faced by our community. The proposed funding will be instrumental in developing a comprehensive spatial plan and hapu environment management plan. These plans will serve as foundational documents, outlining a cohesive vision for Matapihi's future. By investing in these strategic frameworks, we empower our hapu to assert control over our own destiny and preserve our cultural heritage in the face of environmental challenges. In seeking this funding, we aim to position our hapu as the drivers of change, taking proactive steps toward environmental preservation, climate adaptation, and community resilience. The proposed spatial plan and environment management plan will reflect the unique identity and aspirations of Matapihi, serving as a testament to the strength and unity of Ngai Tukairangi hapu.</p>

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		87	2	Ngai Tukairangi Trust	The Trust would like the SGS to better fund an implementation programme that assists hapu in the sub-region to develop their own spatial plans, or revise and update existing planning documets. There also needs to be better alignment with other planning projects so as to relieve some of the engagement fatigue felt by hapu, Maori land trust representatives and other members.
		87	5	Ngai Tukairangi Trust	The importance of HPL can not be overstated, and the Trust would like to see more resources made available, especially for tangata whenua investing in development projects, to understand the impacts of incorrect land use. Following the recent storms and the event of Cyclone Gabrielle, there is an obvious issue with previous land use and planning instruments across the country and the SGS is an opportunity to plan appropriately.
5: Consultation and engagment		3	0	Wansbrough, Nathan	It was important that the consultation process was open and accessible to all.
		53	20	Bowden, Beth Willard	<p>This submission is therefore my own, but it is a considered statement, and one that asks, in particular, for a wider scope of engagement on this Strategy, one that is not unduly constrained by the formalities of the Special Consultative Procedure (SCP) under the Local Government Act 2002. In saying this, I accept of course that SmartGrowth's function is delineated as advisory and as offering a framework and guidance to the planning processes to be undertaken by the Bay of Plenty's local authorities. My years of experience with these processes however indicate some significant deficiencies in Councils' ability to adjust to and incorporate in their District and Regional Plans the grassroots knowledge, understanding and deep love for the places in which local people live, work, play and study. Precisely because of its advisory role, SmartGrowth is well placed to provide Councils with the benefits of critical analysis and courageous insights from outside standard politics and bureaucracy. It should be valued, not dismissed, for doing so.</p> <p>In this submission I intentionally made only rather general points, often in the form of questions. I did so in the hope that there may be opportunities beyond the legislated process to answer some of these questions and to establish a more consensus-based, joined-up strategy that allows citizens to trace clear connections between their present understanding of their place(s) and what comes to pass in their 30-50 year future.</p> <p>Some points on consultation/engagement</p> <p>I note that under the National Policy Statement on Urban Development (NPS-UD) SmartGrowth is required to consult only with local authorities, central government agencies and tangata whenua. The evident gap that remains - the opinions and viewpoints of the general community - is to be dealt with under the SCP mentioned above. I note that the bare month stipulated under s. 83 (1) (b) (iii) has been allowed for this consultation. I also however draw your attention to the 'catch-all' provision at s. 83 (c):</p> <p>This section does not prevent a local authority from requesting or considering, before making a decision, comment or advice from an officer of the local authority or any other person in respect of the proposal or any views on the proposal, or both.</p> <p>as well as the provisions of s. 83AA. It would, in the absence left by the SmartGrowth Forums, be gratifying to create some combined consultative workshops that brought together the various, compulsorily-consulted parties with community-based experts across a range of fields. Perhaps by this means a less silo'd, evidence-shared relationship between the pressures of growth, its benefits and and its limits, could be achieved.</p> <p>It is also possible that, by escaping the constraints of an on-line survey that seems to be the only route for making a written submission within the stipulated timeframe, we could accomplish a richer and more integrated sense of the growth management principles that are in play. Further, it would be really very useful if the structure of the survey - the ordering of its topics, for instance - could mirror that of the Strategy Document itself. There is an apparent internal logic to the "story" of the Strategy. The survey's approach encourages a single-issue response from submitters. I think that a Strategy offering a 30-50 year time horizon should acknowledge and foster attitudes that demonstrate how everything is connected to everything else. Perhaps the Forums had indeed done their dash. But they left a gap that is not beyond our abilities to fill.</p>
		53	0	Bowden, Beth Willard	A model for future planning should be based on citizens assemblies, which would decide on and influence the Smartgrowth Strategy.
		54	0	Robson, John	<p>SmartGrowth had failed to obtain the buy-in of their communities for the visions, strategies, plans, costs, analyses, and base assumptions.</p> <p>It was felt that SmartGrowth had failed to consult with the community on transport, UFTI, and other initiatives.</p> <p>It was felt that the consultation on the SmartGrowth Strategy was insufficient.</p> <p>Mr Robson suggested that, in order to avoid another failure, SmartGrowth must lead, listen, and learn from the community.</p>
		57	0	National Council Of Women Tauranga (Ncw)	A more tailored approach to public engagement would enable a greater understanding of the community's concerns and aspirations.

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		69	8	Pirirakau Tribal Authority - Incorporated	27. We do wish to speak to this feedback (submission) with the political panel during the 4-6 December period to provide for an independent working group to contribute to the Proposed SmartGrowth Strategy for review by Pirirakau and Te Puna Heartlands (Community - proposed by the Te Puna Plan jointly with Pirirakau and the Pirirakau Hapu Management Plans 2004, and 2017). This will include hui a hapu and community meetings to provide for actual participation.
		75	3	Andrews, Julie	In terms of feedback, I have found the sheer amount of information and the short period of time allowed for submissions to be overwhelming and offputting. I also found the conflicting numbers, areas and timeframes shown in tables and maps in the Strategy document (mainly to do with growth and intensification), made the process of submitting even more difficult. I think most people in Tauranga and the sub-region are looking for solutions to congestion and sprawl, and many people are extremely concerned about a variety of issues including climate change, cost of living, housing and what high and medium density will mean for them. However, it is unlikely that all but a few will share their views through this submission process. It is simply too big an ask for people who are already stretched time-wise and/or who feel that it is a lot of effort to (a) get their heads around what is proposed; and (b) put in a submission; when it probably won't make a difference to the outcome (because this is what people have experienced in the past). For the Smartgrowth consultation process to be effective there needs to be more involvement at community level - and as the Strategy notes, there are different needs within different communities.
		77	0	SociaLink	Social Link supported the need for genuine community engagement beyond public consultations on strategies and documents. - It was understood that the community engagement teams in respective councils engaged with communities on a project-by-project basis, which was important. However, it was also important to hear the voices of locals, who had strong local networks, understood the local whenua and had some knowledge of council process, providing important different perspectives to inform decisions. - It was noted that decisions improved when there was evident diversity amongst decision makers.
		87	7	Ngai Tukairangi Trust	The Trust wishes to express thanks to ██████████ Kai Arahi - Tu Pakari for hosting three workshops in preparation for this submission. As such, feedback was circulated with some of the key points raised. One such point that ██████ made in her collective feedback response that particularly resonated with the trust was this; "If you do not receive much feedback on the draft Strategy from tangata whenua, it could be more of an indication of a lack of capacity rather than a lack of interest or concern" The Trust was significantly pressured to get a submission together that articulately spoke to the 180 page document. We have endeavoured to provide our initial comments as well as reiterate some of the comments from the circulated feedback document that we support.

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		91	1	Sustainable Bop Trust	<p>Hence our primary feedback on this Strategy is that, because of its complexity and its many interrelated parts, we believe it is far more conducive to good policy-making to sit down with a broad range of 'stakeholders' to work through issues in an open and interactive way.</p> <p>We have found this submission process to be the most demanding of any council consultation yet. Writing a comprehensive submission requires a massive commitment of time to analyse the Draft Strategy and background documents - and should be better supported by SmartGrowth partners.</p> <p>Our Trust made the decision to focus on engagement with local community groups and networks, rather than just spend our time reading all the background documents. We did that because the Independent Chair informed us that SmartGrowth did not get a large enough budget to do that engagement itself. In retrospect, that was possibly the wrong decision. Most people did not end up sending in a submission. The feedback we received was that it was too complex and that the survey form was not at all helpful, as it didn't provide any prompts to help people shape their feedback.</p> <p>We imagine this was known up front by councils, so it raises the question as to whether you really wanted to elicit a wide range of people's views? Surely your comms advisors told you that this consultation was not best practice?</p> <p>Why couldn't TCC (and partners) spend as much as it has on promoting the Cameron Rd and Te Manawataki o Te Papa projects to support engagement on the single most important thing to ensure a sustainable sub-region: an overarching, evidence-based sub-regional strategy, based around a sustainable funding strategy and a sustainable low carbon plan for future development?</p> <p>If that wasn't possible, the obvious thing to do when consulting on something this complex is to follow standard council practice:</p> <ol style="list-style-type: none"> 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. <p>Due to the lack of diverse and widespread feedback, we believe there is a real danger that you will end up approving something similar to this Draft Strategy, presumably with some changes made in response to public feedback, but not address some fundamental problems built into this growth strategy.</p> <p>We understand the external time pressures. However, if the goal is to get the best outcomes for our region, it is critically important to get this once-in-a-decade strategy right.</p>

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	6: Editorial changes	82	1	Batchelar, Craig	<p>Strategy reference: Whole Strategy Submission: Any changes required to update on matters, particularly those that are timebound, for example reflecting the decisions made on Proposed Plan Changes 33 and 92. Amendment sought: Any amendments required to update matters in the Strategy that have changed since the document was adopted for consultation, in particular decisions on Proposed Plan Changes 33 and 92 if available.</p> <p>Strategy reference: Whole Strategy Submission: The Strategy and FDS will be approved in 2024 based on updated information. The term of the strategy should reflect this and align with the partner LTP dates. Amendment sought: Retitle to "SmartGrowth Strategy 2024-2074".</p> <p>Strategy reference: Whole Strategy Submission: Any changes required following the completion of Draft Long-Term Plans and the Draft Regional Land Transport Plan that are required to the strategy so that there is good alignment. Amendment sought: Any changes required to align with Long-Term Plans and the Regional Land Transport Plan.</p> <p>Strategy reference: Whole Strategy Submission: There are some inconsistencies in how densities are referred to, including whether these are these are minimum densities or targets and whether they net or gross. These should align to the RPS definition. We strongly encourage higher densities around centres and public transport nodes, and these should be reflected in the densities to achieve the objectives of the strategy. Amendment sought: Clarification throughout.</p> <p>Strategy reference: Whole Strategy Submission: Consistency in wording when the term papakainga is used - sometimes we talk about papakainga on Maori land - but in some cases, it won't be Maori land. Amendment: Ensure that when the Strategy talks about 'papakainga' it is broad enough so that it isn't just limited to Maori land.</p> <p>Strategy reference: Whole Strategy Submission: Minor editorial and grammatical corrections throughout the Strategy. Amendment sought: Minor editorial and grammatical corrections throughout the Strategy.</p> <p>Strategy reference: Foreword Submission: Minor correction to foreword to remove specifically referencing Waka Kotahi as they are part of Central Government. Note that the foreword is likely to be updated for the final version of the Strategy. Amendment sought: and central Government (strikethrough: in particular Waka Kotahi - the New Zealand Transport Agency")</p> <p>Strategy reference: Part 1, Benefits of long-term planning, p 15 Submission: Minor correction - add to the benefits of long term planning. Amendments sought: Add 'efficient use of land' as another beneficial and add 'affordable' to bullet 5.</p>
		82	12	Batchelar, Craig	<p>Submission: Suggested additional information for Western Corridor Amendment sought: Information or placeholders could be added for active mode network (not just Wairoa River connections to Tauriko West).</p> <p>Submission: Text Change given lack of detail around 'active modes' for the New Eastern Centre Amendment sought: "New Eastern Centre" seems misplaced in the active modes section 2035-2054. This should be expanded upon or removed.</p>

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		82	2	Batchelar, Craig	<p>Submission: Additional text for the growth directives relating to transformational shift 2. Amendment sought: Opportunities for papakainga and other Maori-led housing on general land as well as whenua Maori should be included within the growth directive.</p> <p>Submission: The graphics in the bottom right should demonstrate how this has changed over time. This will enhance the Key Housing System Challenges identified on Page 112. Amendment sought: Add to the housing graphic in Figure 5 to show how home ownership has changed over time.</p> <p>Submission: Minor correction to core concepts diagram. Amendment sought: The summary of core concept "Access to opportunity" should specify "15-minute journey time by walk or bike ride..." to be consistent with the content on page 101.</p> <p>Submission: The inclusion of indigenous biodiversity in the paragraph to align with other references throughout the Strategy. Amendment sought: Amend the second sentence of the second paragraph as follows: To develop resilient communities, we need to ensure that reducing exposure and vulnerability to climate hazards, cutting back greenhouse gas emissions and conserving, enhancing, and restoring local ecosystems and indigenous biodiversity are all given the highest priorities in everyday decision making and policies on infrastructure, urban development, housing, and transport.</p> <p>Submission: Minor editorial correction Amendment sought: Amend top lefthand box, first and second bullet points as follows: <ul style="list-style-type: none"> • TCC Nature and Biodiversity Action & Investment Plan (word 'plan' underlined) • Plan (word 'plan' strikethrough), Climate Change (word 'change' strikethrough) Action & Investment Plan Biodiversity funding programmes (words 'biodiversity funding programmes' strikethrough) <ul style="list-style-type: none"> • Biodiversity funding programmes (sentence bold and underlined) </p> <p>Submission: Minor editorial correction Amendment sought: 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 (strikethrough words 'Local spatial plan actions - Te Papa, Otumoetai, Mount Maunganui') Local spatial plan actions - Te Papa, Otumoetai, Mount to Arataki (sentence bold and underlined) </p>
		82	3	Batchelar, Craig	<p>Submission: The Mangrove Extent 2011 layer is not clear on the map. The layer is shown as red in the key, and red/black on the map. Amendment sought: Amend the Mangrove Extent 2011 layer on the map to a red colour only.</p>
		82	7	Batchelar, Craig	<p>Submission: Minor text change to include intensification. Amendment sought: First paragraph about population increasing faster than in 2021 "this means more land is needed for housing and employment". Suggest re-wording to "more capacity" instead of "more land" to cover both intensification and greenfield growth.</p> <p>Submission: Change to development infrastructure table to remove Tauriko West Spine Road as it is funded by developers. Amendment sought: Tauriko West Spine Road is funded by developers so should be removed</p> <p>Submission: The footnote as currently worded states that all SmartGrowth partners have a strong preference for the Western Corridor transport improvements to be delivered in a single stage and in an earlier timeframe. This should be changed to say that it is the preference of the SmartGrowth council partners and Priority One Amendment sought: Amend footnote 15 as follows: The SmartGrowth council and iwi partners and Priority One have agreed there is a strong preference and need for Western Corridor transport improvements to be delivered in a single stage within a decade (by 2034) as opposed to the proposed staged delivery over many years potentially extending until 2050 given the significance of the corridor locally and nationally.</p>
7: Smartgrowth partnership		62	7	Envirohub	<p>Representation on the Smartgrowth Leadership Group; Envirohub has noted and supports the inclusion of Priority One, representing the economy, on the SLG. It is equally necessary that the Environment sector and the Social sector also have a seat at the table. A key requirement would be that such representatives have good networks and ongoing connections with their relevant sectors. We ask that that both sectors be included and that this be considered and supported by SLG.</p>

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		65	2	Te Puke Economic Development Group	<p>It is critical that all of our communities have voice and local knowledge is listened to. For many years, a Strategic Partners Forum was successful. It afforded selected interest groups the opportunity to share local aspirations and knowledge, needs based assessments and well thought out ideas. The termination of the Forum was very disappointing and has resulted in a disconnection to industry sectors, communities and local knowledge.</p> <p>We are fully aware that Smart Growth is a planning framework only and approval and implementation processes for growth initiatives sit with the territorial authorities and central government. In our view, the Smart Growth strategy must be connected to communities and interest groups and their local knowledge. We urge you to re-establish the strategic partners forum and to listen to an abundance of local knowledge and ideas that will be invaluable in making sure we achieve the positive S's - Strategic, Sustainable, Serviced, Successful and Satisfied.</p>
		65	7	Te Puke Economic Development Group	<p>Over the last decade we had regular engagement with Smart Growth decision makers. We developed strong relationships and we learned a great deal through the strategic partners forum. We have had mixed success in making progress on issues and needs that we identified, but at a minimum we did have engagement and on occasion support to get important things done.</p> <p>More recently, engagement has been terminated. There has been a noticeable shift toward city needs and a prioritisation to Tauranga and it's near west. This is how we see it. Our perception is our reality.</p> <p>Smart Growth is incredibly important. Smart Growth as a body with an overarching approach to enabling progress across all of our subregional communities can be powerful.</p>
		75	4	Andrews, Julie	<p>I know that in the past, Smartgrowth had forums focused on various sectors, including social and environmental. These forums could be re-established, or take on a new form. There are experts in both the social and sustainability sectors who could offer valuable strategic analysis and input as the Strategy continues to develop and a Housing System Plan is formulated. Facilitating this input would require adequate funding as these sectors currently have limited capacity because of funding constraints. These sectors are just as important as the economic sector, as we grapple with climate change, social problems and the growing inequality in society, all of which have a huge impact on the communities in Tauranga and the sub-region.</p>
		82	11	Batchelar, Craig	<p>Submission: Kiwirail should be included in the SmartGrowth partnership leadership and management framework given the long term significance of rail to urban form and transport.</p> <p>Amendment sought: Amend the Agreement and terms of reference for SLG and/or SGIG or other parts of the SG partnership framework to include KiwiRail.</p>

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		82	5	Batchelar, Craig	<p>Submission: Add to the housing sections the work done in the Priority Development Areas. Amendments sought: Additional text to describe work done on the Priority Development Areas.</p> <p>Submission: Minor additional text to clarify statement around challenges for social housing projects. Amendment sought: Bullet 8: Add in "the development economics in the sub-region make it challenging to deliver social housing projects in some instances".</p> <p>Submission: . Bullet 10: Could be enhanced with facts/statistics. Amendment sought: Additional text - add facts/statistics</p> <p>Submission: Minor additional text to emphasise density around centres and public transport hubs. Amendment sought: On growth directive 8, adding "...in existing urban areas and growth areas, including at higher density around centres and public transport hubs"</p> <p>Submission: Add text and graphic on the Hamilton to Tauranga Corridor initiative which has recently been completed. Amendment sought: Add text to the transport section of the Strategy to describe the Hamilton to Tauranga Corridor initiative. Consider including the graphic.</p>
		91	11	Sustainable Bop Trust	<p>The Need for Local Community Voices</p> <p>All Tauranga and Western BOP communities should have a voice in how we plan for future growth. There is an immense amount of local knowledge and it needs to be listened to by decision-makers. Instead of scrapping the SmartGrowth Forums, the Strategic Partners' Forum should have had an increased role at this crucial time and there should have been investment into community engagement to gather people's aspirations, criticisms, and recommendations for our sub-region.</p> <p>The explanation that the Forums were ended because "we are in an implementation phase" was misleading. We are always in an implementation phase. Now, more than ever, we are also in a planning phase and we needed those voices in 2022 and 2023 to ensure a robust, evidence-based Strategy. Yet that was precisely when SmartGrowth terminated the Forums!</p> <p>We have nationally recognised sustainability experts who live and/or work in Tauranga-WBOP and who are willing to invest time into supporting a more sustainable region. Yet these people are largely ignored.</p> <p>We strongly urge you to re-establish the Strategic Partners' Forum ASAP and to tap into the immense local knowledge that can help to guide you towards a genuinely sustainable Strategy - one that is more financially, economically, socially and environmentally sustainable.</p> <p>Equally importantly, we urge you to add representation from Social wellbeing and Environmental wellbeing onto the SmartGrowth Leadership Growth and Senior Management Group, to balance and complement the Economic representation on those groups. We also note that this representation needs to be representative of the broader community views, and not representing the views of any one organisation.</p> <p>Along those lines, we also note that the recent appointment of Priority One does not fit that mandate, as we do not believe that organisations that primarily service their membership should be representatives on public planning bodies. We note Te Puke EDG is also an important economic body in the sub-region. More importantly, the representatives should represent the views of the wider community.</p> <p>Those comments in are no way intended to convey any criticism about any organisation/s themselves, but to critique the rationale for selecting representatives onto the SLG and SMG.</p>