

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

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

Staff Narrative
<p><u>Overview of feedback received</u></p> <p>Overall, 13 submission points were coded to Areas to be Protected and Developed Carefully arising from 10 submitters:</p> <p>Pirere, Tania - submitter 17 Richard, N/A - submitter 27 Ministry Of Education – submitter 59 Nga Potiki a Tamapahore Trust – submitter 72 Wallen, Bruce – submitter 30 Sadler, Jon – submitter 46 Fitter, Julian Richmond – submitter 47 Bowden, Beth Willard – submitter 53 Robson, John -submitter 54 Waste Management NZ Ltd -submitter 74</p> <p>Three submitters (Sub I.D #72, #59, #74) generally support the approach to protect and avoid specific areas and the precautionary approach to growth in areas with natural hazard susceptibility and other land constraints. Submitter I.D #54 generally opposes the chapter.</p> <p>Submitter I.D #72 expressed support for adopting maps 1, 2, 2a, 2b in relation to its land located at Tara Road, Pāpāmoa. The submitter acknowledged that there are some constraints on its site and acknowledge the go carefully approach in relation to Highly Productive Land and flooding constraint/hazard layers.</p> <p>Submitter I.D #59 are also in support of the overall approach to direct development away from areas where there are significant constraints to development or intrinsic environmental and cultural attributes that must be protected from future land development. The precautionary approach to growth in areas with natural hazard susceptibility and other land constraints is also supported.</p>

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

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

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

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

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

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

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

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

Issue 2: Constraining development in areas with natural hazard risk

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

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

Issue 3: Coastal inundation and flooding

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

Key considerations

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

The SmartGrowth background papers should also be referred to:

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

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

Options overview

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

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

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

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

	<ul style="list-style-type: none"> • Part 3: Chapter 01- Areas to be Protected and developed carefully -Map 2 – ‘Go Carefully’ – <i>Flooding</i>. Layers includes coastal inundation and flooding (NB urban area layer covers the Pāpāmoa coastline) (page 54) • Part 3: Chapter 03 – Climate Resilience- Map 5 – <i>Areas at Risk from Climate Change</i> (page 79) • Part 3: Chapter 01- Areas to be Protected and developed carefully – Growth directive 3 – Take a precautionary approach to development in areas identified as ‘go carefully’ (page 51) • Part 3: Chapter 03 Climate Resilience – Climate resilience key challenges – 3, 7 (page 74-75) • Part 3: Chapter 03 Climate Resilience –Figure 18 – Snapshot of climate change risk to Tauranga City (72) • Part 3: Chapter 03 Climate Resilience – Regional, sub-regional and district responses (page 73)
<p>Option 3A (Recommended)</p>	<p>Note the submission and make no changes</p>

Issue 1: Limiting growth and providing green corridors, sustainability, and resilience.**Option 1A:** Note the submission and make no changes**Not Recommended****Advantages**

- Chapter 01 has identified those areas where new development should not occur due to critical constraints and where there are intrinsic environmental, cultural and heritage attributes. The draft strategy has also identified areas where there is natural hazard susceptibility and other land constraints and directs growth away from these areas unless it can be demonstrated that the issues can be managed with risk mitigated to acceptable levels. This approach identifies that there is already a limit to growth in areas of the sub-region. The identification of “areas to protect” (and avoid) and “areas to develop carefully” is vital to the spatial planning process as it provides an understanding of where future investment and land development should be avoided, as well as where it may be appropriate.
- The Chapter 01 Key Challenges section addresses the importance of creating resilient communities, buildings, and infrastructure.

Disadvantages

- Some of the submissions have focused on sustainable and resilient places and there is an opportunity to include supplementary text in Chapter 01 to further highlight the benefits of protecting ecosystems and their services and prioritising ecological health in development.

- Part 3: Chapter 04 Te Taiao – Our Environment’ addresses the issues arising from the submission points, with references to:
 - Integration of the principle of Ngā Wai ki Mauao me Maketū (fundamental principle outlined on page 80/81) with other key topics in the strategy.
 - Reference to the methods of water sensitive urban design, low impact design, and integrated catchment planning to promote clean and sustainable water outcomes.
 - improving access to open space and green space to provide a sponge for rainfall infiltration and for people’s mental health and social well-being of the community.

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

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

- The chapter already explains that areas with natural hazard susceptibility and other land constraints have been identified and mapped to direct growth away from these areas unless it can be demonstrated that the issues can be managed with risk mitigated to acceptable levels.
- Potential development opportunities within the areas with 'go carefully' layers remain unchanged as the SmartGrowth Strategy is not an RMA planning document. Development is managed through the Regional Policy Statement, and City and District Plans. The weight to be given to the final SmartGrowth Strategy in decision making will be '*have regard to*'. Current and future plans implementing the SmartGrowth Strategy will consider greater or less \ control on development is required in the areas identified in Map 2.

Financial implications

N/A

Other considerations

As well as understanding areas where it may be appropriate to develop we also need to understand areas where there are risks and where development may not be appropriate. There are some areas which may be exposed to hazard risks – such as geohazards, flooding, coastal erosion, and inundation – to the extent that future risk must be avoided and development potentially curtailed.

The submitter considers that the strategy must not unnecessarily constrain development, particularly where there are other alternatives to manage natural hazard risks. However, a constraint, such as a natural hazard for example does not automatically indicate a high level of exposure to risk. In many cases the level of risk to life or property associated with the hazard constraint is relatively low and could be adequately managed through design and engineering solutions.

Option 2B: (Recommended)

- Provide additional text in Chapter 01 Areas to be protected and developed carefully – 'Introduction', after paragraph 6 as follows :
 - The maps included are presented at a high-level sub-regional scale for spatial planning purposes only and may be subject to change through other processes (such as updates to hazard mapping). Site-specific constraints and features to protect are

managed and assessed through Regional and District planning policies and rules, and other statutory procedures such as LIMs and Building consents.

Advantages

- Inserting additional text to clarify the status of the maps will help remove any ambiguity. The maps also do not 'lock in' direction as subsequent RMA processes, whilst having regard to the SmartGrowth Strategy, will require more detailed analysis to be undertaken with more detailed information provided to consider site-specific conditions.

Disadvantages

- None

Financial implications

N/A

Other considerations

The Chapter 01 Areas to be protected and developed carefully maps show the environmental, cultural and heritage attributes, natural hazards, and other land use considerations in the western Bay of Plenty. These have been informed by established policy direction and various technical studies. Individual GIS map layers have been grouped by category (No-Go, Go Carefully) and by sub-categories. Maps have been prepared at the level of these eight subcategories for the Go Carefully layers. The No-Go and Go Carefully GIS map layers have been aggregated upwards to create two composite maps to show the No-Go and Go Carefully areas. Layering all the No-Go and Go Carefully layers on top of each other highlights the most constrained areas of the sub-region and forms the basis of assessment of specific locations for growth. It will be up to the proponent of any plan change or resource consent to provide information that demonstrates the effects of natural hazards can be avoided or mitigated.

Issue 3: Mitigating coastal inundation and flooding

Option 3A: Note the submission and make no changes (**Recommended**)

Advantages

- The draft SmartGrowth Strategy must spatially identify the broad locations in which development capacity will be provided over the long term, the development infrastructure and additional infrastructure required to support or service that development capacity, and any constraints on development. City and District Plans are statutory documents required by the Resource Management Act and will be the main regulatory tool for implementing the strategy, setting out the policy and rule framework. The submitters request to consider more building restrictions for coastal areas where there is a risk of coastal inundation would need to be considered as part of a Tauranga City Plan and Western Bay of Plenty District Plan review.
- Chapter 01 Map 2a -*Go Carefully Flooding* along with Chapter 03 Map 5 -*Areas at Risk from Climate Change* identify areas at risk from coastal inundation and flooding. The councils continue to collect new data and update existing natural hazard mapping on a rolling basis to ensure it covers the whole sub-region, incorporates updates in scientific knowledge, guidelines, legislation, and responds to updated climate change projections.
- Chapter 01 'Areas to be protected and developed carefully' along with Chapter 03 'Climate Resilience' provide acknowledgement of the challenge of natural hazards being exacerbated by climate change, citing coastal inundation as a hazard. Chapter 01 Key Challenges notes that it will be important to continue to manage natural hazard risks including updating hazard mapping over time, considering future plan changes, infrastructure resilience planning and community based adaptation planning where appropriate.

Disadvantages

- None.

Financial implications

N/A

Other considerations

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

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

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

Recommended Decision

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

Option 1B:

Provide additional text in Part 3: Chapter 01 *Areas to be protected and developed carefully* as follows:

- Include text in the introduction (paragraph 2) to add a description of the benefits of protecting ecosystems, as follows: There is a scarcity of indigenous ecosystems, and it is important that existing ecosystems are protected. The ecological health of the natural environment plays a critical role in the functionality of urban spaces and the quality of life within them. In addition to the intrinsic value of these ecosystems, they provide important habitat for threatened, at risk and taonga species, help regulate climate stressors, improve resilience and well-being, and enable customary practices. People should also continue to have opportunities to readily access high quality natural environments in urban areas, such as parks and reserves, to enjoy the broad range of environmental and social benefits they offer.
- Include additional text in *Key challenges #1. Pressures on the natural and cultural environment* as follows: The subregion faces some long-term environmental challenges including declining water quality, degradation of the local environment and alteration of natural ecosystems. These challenges are likely to be exacerbated by population and economic growth as well as the impact of climate change in the long-term. We will need to respond proactively to challenges faced, enabling protection and enhancement and restoration of areas including environmental and cultural assets along with avoiding development in higher risk or constrained locations. In continuing to foster economic growth and development we will need to ensure that natural assets continue to provide the critical resources and environmental services on which are well-being relies.
- Include an additional case study to highlight the protected status of the Kaimai Mamaku Forest Park, which is a taonga, connecting two regions, numerous iwi and hapū, conservation and recreation groups and livelihoods. Outline the importance of maintaining a healthy and functioning ecosystem.

Reasons for recommendation:

- Some of the submissions have focused on the importance of creating sustainable and resilient places and whilst Chapter 04 –Te Taiao Environment covers the aspirations for protecting and enhancing the environment including using nature-based solutions, it is considered that there is merit in including supplementary text in the Chapter 01 Introduction and Key Challenges sections. This will be to highlight the critical role of the natural environment, and its environmental attributes

and services, in contributing to the achievement of a well-functioning urban environment.

- Including an additional case study in this chapter would add value by providing a counterbalance to the case study on the Tauranga Infrastructure Resilience Programme (page 51), ensuring both the 'areas to protect' and 'areas to develop carefully' components of the chapter are fully represented in the chapter.

Issue 2: Constraining development in areas with natural hazard risk

Option 2B:

Provide additional text in Part 3: Chapter 01 Areas to be protected and developed carefully 'Introduction' after paragraph 6 as follows:

- The maps included are presented at a high-level sub-regional scale for spatial planning purposes only and may be subject to change through other processes (such as updates to hazard mapping). Site-specific constraints and features to protect are managed and assessed through Regional and District planning policies and rules, and other statutory procedures such as Land Information Memoranda and Building Consents.

Reasons for recommendation:

- Inserting additional text to clarify the status of the maps will help remove any ambiguity and help to reinforce that the maps are at a sub-regional scale. The maps also do not 'lock in' direction as subsequent RMA processes, whilst having regard to the SmartGrowth Strategy, will require more detailed analysis to be undertaken with more detailed information provided to consider site-specific conditions.

Issue 3: Mitigating coastal inundation and flooding

Option 3A:

Note the submission and make no changes.

Reasons for recommendation:

- The Strategy includes identification of areas at risk from coastal inundation and flooding in Chapter 01 Map 2a and Chapter 03 Map 5. Chapter 01 and Chapter 03 also provide acknowledgement of the challenge of natural hazards being exacerbated by climate change, citing coastal inundation as a hazard.
- The SmartGrowth Strategy is not a RMA document and the submitters request to consider new building restrictions for coastal areas would need to be considered as part of a Tauranga City Plan and Western Bay of Plenty District Plan review.

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

Date approved:

Approved by:

SmartGrowth Strategy 2023–2073

ISSUES AND OPTIONS PAPER

Tāngata Whenua

Author: Elva Conroy

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

Staff Narrative

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

Overview of feedback received

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

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

Issue 1: Partnership and Participation within SmartGrowth

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

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

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

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

Issue 2: Enabling the Marae as Centres approach

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

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

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

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

Options Overview

Issue 1: Partnerships and Participation within SmartGrowth

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

Option 1A
(recommended)

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

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

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

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

Issue 1: Partnerships and Participation within SmartGrowth

Option 1A (recommended): Note the submissions and make no changes to Strategy content. Nevertheless, review and improve the way the SmartGrowth partners work with hapū, marae, Iwi and Māori communities to achieve SmartGrowth outcomes. The method of review will be guided by the CTWF as well as Council Kaupapa Māori staff and partner forums.

Advantages

- Addresses the matters within submissions.
- Improved view and perception of SmartGrowth.
- Potential increase in engagement of hapū and Iwi with the CTWF and SmartGrowth projects.

Disadvantages

- Capacity of already-stretched Tū Pakari team to coordinate discussions (outlined below) and identified recommended improvements.
- Diverted focus and attention from Strategy implementation (e.g. Marae as Centres Programme).

Financial implications

There is no specific budget to review and improve the way of working within SmartGrowth.

Other considerations: The first CTWF meeting of the year is scheduled for 26 February 2024. This meeting will include focused discussion on strategic direction; work plan for the year and ways to connect better with hapū, marae and Māori land trusts. Time will be set aside at this workshop for further discussion on the matters outlined within this paper.

SmartGrowth to consider providing more interactive, useable, and accessible online mapping tools. This would help to better inform tāngata whenua engagement and support the Marae as Centres programme.

Issue 1: Partnerships and Participation within SmartGrowth

Option 1B: Note the submissions. In addition, make no changes to Strategy content or way of working with tāngata whenua.

Advantages

- Systems and processes already in place.

Disadvantages

- Submissions highlight that this option does not adequately ensure meaningful partnership and participation of tāngata whenua within SmartGrowth.
- Increase in frustration of hapū and Iwi with SmartGrowth.

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

Issue 2: Enabling the Marae as Centres approach

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

02. Marae as Centres and Opportunities for Whenua Māori

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

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

Advantages

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

Disadvantages

- Financial implication.

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

Recommended Decisions

Issue 1: Partnerships and Participation within SmartGrowth

Option 1A: Note the submissions and make no changes to Strategy content. Nevertheless, review and improve way of working within SmartGrowth.

Issue 2: Enabling the Marae as Centres approach

Option 2A: Note the submissions and make no changes to Strategy content. In addition, include action(s) in the funding and implementation plan relating to future support and resourcing of tāngata whenua in the Marae as Centres programme.

Decision

Issue 1: Partnerships and Participation within SmartGrowth

Option 1A: Note the submissions and make no changes to Strategy content. Nevertheless, review and improve way of working within SmartGrowth.

Issue 2: Enabling the Marae as Centres approach

Option 2A: Note the submissions and make a minor change to Transformational Shift 2 within the Strategy. In addition, include action(s) in the funding and implementation plan relating to future support and resourcing of tāngata whenua in the Marae as Centres programme.

Reason

Options 1A and 2A

- Addresses the concerns raised in the submissions and result in actions that demonstrate a meaningful commitment to tāngata whenua as partners to SmartGrowth.
- Improved view and perception of SmartGrowth.
- Increase in engagement of hapū and Iwi with the CTWF and SmartGrowth projects.
- Greater chance of success for the Marae as Centres programme.

In both cases, implementation will be guided by the CTWF as well as Council Kaupapa Māori staff and partner forums. This will build on existing work, at a local or marae level, and ensure that initiatives are adequately phased, resourced and supported.

Date approved:

Approved by:

SmartGrowth Strategy 2023–2073

ISSUES AND OPTIONS PAPER

Climate Resilience

Author: Manini Abernethy (Bay of Plenty Regional Council)

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

Staff Narrative

Overview of submissions

19 submitters provided feedback on the climate resilience chapter.

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

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

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

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

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

Issue 1: Managed retreat

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

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

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

Issue 2: Emissions reductions targets

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

Issue 3: Climate resilient development

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

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

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

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

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

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

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

Issue 4: Climate change action

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

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

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

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

The following SmartGrowth background papers should also be referred to:

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

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

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

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

Issue 1: Managed retreat**Option 1A: Note the submissions and make no changes.****Advantages**

- The Strategy promotes the achievement of climate-resilient development with three key principles including integrating climate resilience into the Connected Centres programme.
- The Strategy notes that Iwi and community members will need to be involved in climate change adaptation processes and to be able to make informed decisions about their future (refer page 75).
- The Strategy identifies key climate resilience challenges including the need to involve Iwi and community members in climate change adaptation processes and to be able to make informed decisions about their future (refer page 75), and the costs of adaptation in climate-vulnerable areas and possibly managed retreat from at-risk coastal areas (refer page 76, emphasis added).

Disadvantages

- No clear direction is provided in the Strategy to promote the community-led approach and process in preparing a fit for purpose climate adaptation plan.
- Does not specifically identify any land areas that may be required to deal with managed retreat (if required) as requested by submitters.

Financial implications

None.

Other considerations

The National Adaptation Plan (NAP) adopted in 2022 is a six-year plan intended to help New Zealand adapt to climate change. It has four key priorities to address including driving climate-resilient development in the right places and laying the foundations for a range of adaptation options including managed retreat. The NAP has had a significant effect on the Strategy (page 29). The Strategy promotes the achievement of climate-resilient development with three key principles including integrating climate resilience into the Connected Centres programme. The Strategy also identifies key climate resilience challenges including costs of adaptation in climate-vulnerable areas where it specifically notes a range of adaptive actions will need consideration, such as strengthening coastal infrastructure, construction of resilient housing, and possibly managed retreat from at-risk coastal areas (page 76, emphasis added).

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

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

Advantages

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

Disadvantages

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

Financial implications

None.

Other considerations

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

A recently released report¹ notes that there is a lack of clear direction from the Government on how and when to plan and implement adaptation (particularly managed retreat). The Climate Adaptation Bill which was expected (under previous Government) to address policy issues around managed retreat and to give guidance on local adaptation planning, is still being developed. The report makes a few recommendations including noting the importance of involving and working with local communities on planning and implementing strategic local responses to climate change and, support for community engagement at central government level.

Issue 2: Emissions reductions targets

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

Advantages

No changes required and various partner climate action plans and initiatives can proceed as planned.

Disadvantages

- Some members of public may not be aware of the targets.
- The market is unlikely to deliver housing intensification at the necessary scale and pace required to reduce emissions without stronger strategic direction.

Financial implications

None.

Other considerations

From a climate resilience perspective, the Strategy has identified key climate resilience challenges including requiring transport infrastructure to be planned, designed, built, and operated in a way that anticipates, prepares for, and adapts to changing climate conditions.

In 2022 the Government published its first Emissions Reduction Plan (ERP). The ERP sets out the principles the Government will use, and the actions it will take, to meet New Zealand's domestic greenhouse gas emissions reduction target². New Zealand has several greenhouse gas emissions reduction targets. They include both domestic and international targets up to the year 2050.

The SmartGrowth Strategy transport chapter identifies four sub-targets for reducing transport emissions by approximately 41% from 2019 levels. The Strategy (page 73) refers to the various climate action plans in place at a regional and district level:

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

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

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

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

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

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

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

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

and

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

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

Advantages

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

Disadvantages

None

<ul style="list-style-type: none"> • Captures all new developments rather than just building and community centre design. • Acknowledges importance of the role accessible and frequent PT services play in facilitating low emission outcomes in new developments. 	
Financial implications	
None.	
Other considerations	
<p>There are many forms of multi-occupant vehicles, all of which are better for the environment than the same individuals driving alone. Carpooling is a practicable tool for regularly scheduled commutes, especially to lower-density employment centres, such as business and industrial parks, that are not dense enough to attract high-quality transit³.</p> <p>Submitter 47 also commented about the housing density being too low in new growth areas to reduce emissions. It is worth noting that a blanket target of 30 DPH "over time" (ie. medium density) is much lower than what has been needed overseas to enable development of low-emissions urban systems. Higher density style housing also provides more flexibility/adaptive capacity as public green space which can accommodate expansion of blue-green infrastructure solutions tends to be maximised.</p>	
Issue 3: Climate resilient development	
Option 3A: Note the submissions and make no changes.	
Advantages There are no changes required to the Strategy and <i>Principle 2</i> (page 67), refers to climate resilience development.	Disadvantages Does not address the importance of considering the health, safety and wellbeing of people in climate resilience development.
Financial implications	
None. No changes are required under this option.	
Other considerations	
None.	

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

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

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

Advantages

- The Strategy prioritises the health, safety and wellbeing of people particularly for the vulnerable population when considering climate resilience development.
- Addresses the recommendations of the submitter to include consideration of elderly population during extreme heat environments resulting from climate change.

Disadvantages

None identified.

Financial implications

None. Minor textual changes are required.

Other considerations

The submitter has made recommendations for the Strategy to include design considerations for homes to be safer during extreme heat particularly for the elderly and vulnerable population. The recommendations are specific to building design and development and applicable at a regulatory level such as through resource or building consent matters.

However, based on the recommendations from the submitter, there is an opportunity to incorporate the health, safety and wellbeing of people particularly the elderly and vulnerable when developing with climate resilience in mind by including this in the chapter.

Issue 4: Climate change action

Option 4A: Note the submissions and make no changes.

Advantages

No changes to be made to the Strategy.

Disadvantages

There is no clarity in the Strategy around the need for a climate action plan.

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

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

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

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

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

Issue 3: Climate resilient development

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

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

Reasons for recommendation:

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

Issue 4: Climate change action

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

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

Reasons for recommendation:

- Enables the Strategy to provide a strong strategic direction and support for the current and developing climate action plans and initiatives for the western Bay of Plenty.
- Avoids duplication of actions and initiatives of various existing climate action plans for the western Bay of Plenty.

Decision

(To be completed in the decision-making meeting)

Reason

(To be completed in the decision-making meeting)

Date approved:

Approved by:

SmartGrowth Strategy 2023–2073

ISSUES AND OPTIONS PAPER

Te Taiao –Environment

Author: Barbara-Ann Overwater

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

<p>Staff Narrative</p> <p><u>Overview of feedback received</u></p> <p>A total of 19 submission points were coded to Te Taiao – Our Environment arising from 15 submitters:</p> <p>Ranjard, Louis – submitter 1</p> <p>Low, Jason –submitter 35</p> <p>Sustainable Bop Trust – submitter 91</p> <p>Smith-Kerr, Stephanie Heather – submitter 2</p> <p>Pirere, Tania – submitter 17</p> <p>Mcleod, Whitiara – submitter 32</p> <p>Ministry Of Education – submitter 59</p> <p>Chalmers, Nick – submitter 20</p> <p>Fitter, Julian Richmond – submitter 47</p> <p>Bowden, Beth Willard – submitter 53</p> <p>Robson, John – submitter 54</p> <p>Envirohub – submitter 62</p> <p>Pirirakau Tribal Authority – Incorporated – submitter 69</p> <p>Tangata Whenua Collective submission – submitter 60</p> <p>Ngai Tukairangi Trust – submitter 87</p> <p>Two submitters (Sub I.D #32, # 59) generally expressed support for the approach outlined in the chapter. Submitter I.D #54 generally opposes the chapter.</p> <p>Submitter I.D #17 did not provide specific feedback on the chapter however highlighted the work of D.O.C in looking after our tupuna and making sure our whenua and Moana are protected.</p> <p>Issue 1: Poor air quality</p> <p>Three submitters (Sub I.D #1, #35, #91) expressed concern about air quality in the area, with two of these submitters (Sub I.D #35, #91) requesting to move the polluting industry away from the Mount industrial zone. Sub I.D #1 considers air quality a top priority for the development of the region however sees only limited mention of it in the strategy. This submitter suggests imposing standards for the industry and to limit the traffic in the area until air pollution returns to safe levels. Sub I.D #91 questioned why</p>

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

Issue 2: Impact of growth on the environment

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

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

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

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

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

Issue 3: Manage and protect freshwater resources

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

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

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

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

Key considerations

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

The SmartGrowth background papers should also be referred to:

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

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

Options overview

Issue 1: Poor air quality

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

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

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

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

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

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

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

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

Issue 1: Air Quality

Option 1A: Recommended

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

Advantages

- Would address submitters concern regarding the need for more recognition of the issue of poor air quality.

Disadvantages

- Does not directly respond to some of the submission points received in relation to moving polluting industrial activities away from the Mount Maunganui Industrial area. This issue has been raised as part of the Mount to Arataki Spatial Plan consultation. The Strategy is not the place to be addressing

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

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

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

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

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

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

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

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

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

understanding of resources available for municipal water supply and to develop a plan regarding how these resources may be sustainably utilised moving forward to provide municipal water to communities in the western Bay of Plenty in the short to medium term. Initial analysis work has been completed. Based on the outcomes of the work to date there has been ongoing and regular collaboration between the partners to understand and resolve sub-regional water supply challenges. TCC and WBOPDC are in the process of co-developing a 30-year Water Supply Strategy which will address long-term needs of the sub-region to give effect to Te Mana o Te Wai and the NPS-FM. The strategy will inform investments, plans and policy decisions required to support planned growth in the sub-region.

Option 3B: **Not Recommended**

Option 3A
and:

- Include an additional growth directive in *Part 3: The Spatial Plan- Chapter 04 Te Taiao Our Environment* to refer to:
The vital importance of clean, healthy water is recognised and the health and well-being of waterbodies, freshwater ecosystems and their catchments are valued, protected, and restored.

Advantages

- As option 3A
and;
- Reflects the growing understanding of water as a precious resource
- May help the consideration and implementation of the concept of Te Mana o te Wai in the Implementation and Funding Plan priorities, actions/initiatives.

Disadvantages

- As option 3A
and;
- An additional growth directive may result in a duplication of direction. The existing environment growth directive in Chapter 04- '*A full range of ecosystems in the western Bay of Plenty are maintained or restored to a healthy, functioning state*' – captures all ecosystems, including freshwater ecosystems.

Financial implications

N/A

Other considerations

Recommended Decisions

Issue 1: Poor air quality

Option 1A:

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

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

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

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

Reasons for recommendation:

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

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

Issue 2: Impact of growth on the environment

Option 2A:

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

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

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

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

Reasons for recommendation:

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

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

Issue 3: Manage and protect freshwater resources

Option 3A:

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

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

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

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

Reasons for recommendation:

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

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

Decision

(To be completed in the decision-making meeting)

Reason

(To be completed in the decision-making meeting)

Date approved:

Approved by:

SmartGrowth Strategy 2023–2073

ISSUES AND OPTIONS PAPER

Transport

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

Topic	Transport Planning
Themes	<ol style="list-style-type: none"> 1. Passenger rail 2. Improved public transport 3. Investment in transport infrastructure 4. Transport for an aging population and planning for all abilities 5. Infrastructure for walking and cycling 6. Car parking 7. Managed Lanes 8. Resilience 9. Ferries 10. Park and ride facilities and services 11. Emissions and air pollution 12. Miscellaneous

Staff Narrative

Overview of feedback received, related to Transport Planning

Out of the 93 submissions received, 35 refer to transport matters. Twelve ‘themes’ are evident in the submissions and are discussed below. Within each themes numerous issues were raised, and these are also responded to below.

Theme 1 – Passenger rail

Seventeen submitters discuss passenger rail in their submissions. All seventeen submitters support the idea that Western Bay of Plenty generally and Tauranga in particular should have a passenger rail service. Although some submissions are quite specific by suggesting e.g. passenger trains between Hamilton and Tauranga, other submissions just note ‘trains’ without specifying whether their comment relates to inter-regional passenger transport e.g. between Tauranga and Hamilton, or whether they focus more urban passenger services such as light rail. Most consider this service from an environmental and climate change perspective, as one of the submitters opined “[it will be] one of the key ways of reducing carbon outputs in our city”. Another submitter suggests that the government should fund electric passenger trains. Other submitters suggest upgrading the existing rail tracks (potentially double tracking the line) so that the service can link different centres within the Western Bay as well as the wider region

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

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

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

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

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

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

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

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

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

Theme 2 – Improved public transport

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

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

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

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

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

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

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

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

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

Theme 3 – Investment in transport infrastructure

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

The majority of submissions that discuss a lack of investment would like to see more proactive infrastructure investment to effectively support housing and commercial growth. There were also specific submissions regarding the need to better invest in roading for enhanced Port of Tauranga accessibility, i.e. reliable freight journey times. Around half of the submissions that support upfront roading investment deem it appropriate to expand the roading network to reduce congestion, whereas the other half state the need to front foot roading investment prior to enabling growth.

This variety of commentary demonstrates the tension between providing infrastructure to support growth, and the planning required to lead and form growth in an appropriate and sustainable/feasible way.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Current initiatives to support accessibility in the region include:

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

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

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

Future BOPRC actions include:

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

Theme 5 – Infrastructure for walking and cycling

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

The Strategy includes two directives on this topic:

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

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

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

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

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

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

Investments include the following:

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

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

Key sections of this currently being planned include:

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

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

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

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

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

Theme 6 – Car parking

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

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

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

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

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

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

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

Theme 7 – Managed Lanes

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

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

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

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

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

Theme 8 – Resilience

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

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

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

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

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

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

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

Theme 9 – Ferries

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

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

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

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

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

https://infocouncil.boprc.govt.nz/Open/2023/11/PTC_20231114_AGN_3629_AT.PDF

In key conclusions of the study can be summarised as:

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

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

Theme 10 – Park and Ride facilities and services

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

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

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

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

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

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

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

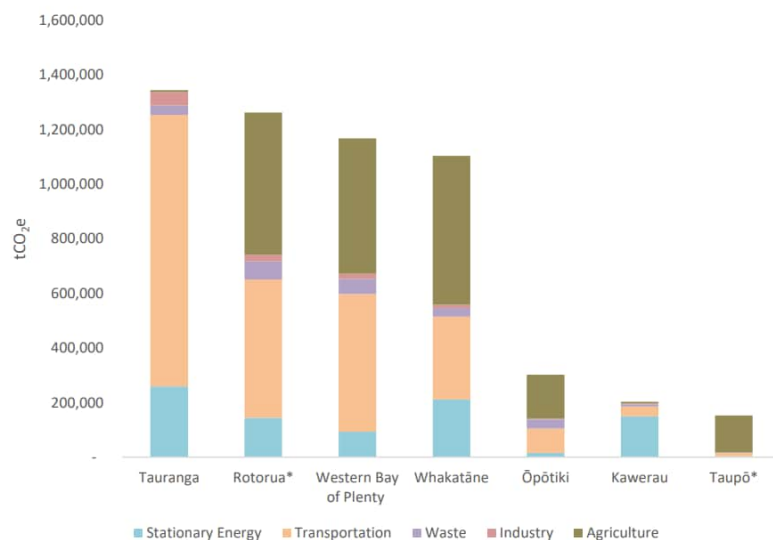
Theme 11 – Emissions and Air Pollution

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

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

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

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



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

The following documents and project are relevant in this context:

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

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

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

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

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

Theme 12 – Miscellaneous

A – Engagement on UFTI and the TSP:

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

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

Stakeholder Engagement

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

B - Changes regarding the Government's direction on transport

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

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

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

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

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

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

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

Option 1A, Include a sub-regional Passenger Rail transport futureproofing study in the Implementation Plan

Advantages

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

Disadvantages

- Costs involved in study
- A study might be considered moving ahead of response to the Select Committee 'Inquiry into the future of inter-regional passenger rail in New Zealand'.

Financial implications

Cost of undertaking study

Other considerations

None

Option 1B: Include a joint inter-regional passenger rail business case between BOPRC and Waikato Regional Council in the implementation plan

Advantages

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

Disadvantages

- Costs involved in undertaking the business case
- A study might be considered moving ahead of response to the Select Committee 'Inquiry into the future of inter-regional passenger rail in New Zealand'.

Financial implications

Cost of undertaking the business case

Other considerations

None

Option 1C: No changes to the strategy, not including a Passenger Rail futureproofing study nor a business case	
Advantages <ul style="list-style-type: none"> No additional costs 	Disadvantages <ul style="list-style-type: none"> No further information available, which may lead to a risk that strategic property required to enable a future passenger rail service may become more challenging in future. Uncertainty to remain, and questions continue to be asked by the community about passenger rail.
Financial implications	
None	
Other considerations	
None	

Option 2A, No changes to current public transport planning	
Advantages <ul style="list-style-type: none"> Continue to follow existing planning processes for improving public transport in the Western Bay No changes to the process, allows projects such as the Public Transport Services & Infrastructure Business Case, and projects to investigate upgraded bus interchanges to be completed. 	Disadvantages <ul style="list-style-type: none"> Some community members may consider a more urgent need to improve the quality of the region's public transport network.
Financial implications	
<i>none</i>	
Other considerations	
None	

Option 3A – Investment in infrastructure, no changes to the strategy

Advantages

- Work with central government and other organisations to investigate co-funding opportunities for infrastructure investments can continue as planned.

Disadvantages

- Alternative funding avenues not explicitly identified in the strategy .

Financial implications

no changes proposed

Other considerations

None

Option 4A, Transport for an aging population, no changes to strategy

Advantages

- Various studies and projects underway can proceed as planned without changes.

Disadvantages

- Demographic changes potentially not clearly addressed in the draft strategy.
- Not adapting the strategy may provide a lack of awareness of the need to improve the region's infrastructure for people with all abilities.

Financial implications

None

Other considerations

None

Option 4B: Transport for an aging population, making changes to the strategy

Advantages

- Demographic changes potentially to be better recognised in the draft strategy.
- Updating the strategy increases awareness of the need to improve the region's infrastructure, for both an aging population and for people with all abilities.

Disadvantages

- None

Financial implications

None, due to existing projects in place

Other considerations

Updates to the SmartGrowth Strategy to include more data on the projected aging population and implications of this.

It is noted that infrastructure for an aging population also benefits all users of modes of transport to be accessible for all abilities, and provide an overview of the work underway and planned for this theme.

Option 5A – No changes to planned walking and cycling projects

Advantages

- Currently planned within the TSP can continue without change.

Disadvantages

- All current projects are subject to co-funding from NZ Transport Agency–Waka Kotahi. The new government has noted it will be considering reduced investment in walking/cycling projects, which may result in a higher portion of funding required by local councils, or that projects may need to be postponed.

Financial implications
None
Other considerations
None

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

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

investment, and reduces the need for investment in new parking spaces using ratepayers money.	
Financial implications	
None	
Other considerations	
None	

Option 6B – Car parking – investigate increasing numbers	
<p>Advantages</p> <ul style="list-style-type: none"> Council investment in more parking supply is likely to keep parking availability at a high level. 	<p>Disadvantages</p> <ul style="list-style-type: none"> Significant council investment required by all ratepayers, including those who don't drive. Users of parking spaces not paying the actual costs Limited opportunities for private investment Update of other modes of transport less attractive
Financial implications	
<i>Significant, but further details to be confirmed</i>	
Other considerations	
None	

Option 7A – Managed Lanes – no further changes to the strategy	
<p>Advantages</p> <ul style="list-style-type: none"> Existing workstreams underway can continue as planned. 	<p>Disadvantages</p> <ul style="list-style-type: none"> Subject to the outcomes of both the Public Transport Services & Infrastructure Business Case and the Managed Lane Study, additional implementation budget may be necessary (to be confirmed on the outcomes of these studies).

Financial implications
No change to planned investment.
Other considerations
None

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

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

Financial implications
None
Other considerations
None

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

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

Other considerations

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

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

- No further spend on park and ride investigations outside of existing projects such as the PT infrastructure and services business case.

Disadvantages

- Some submissions may consider that park and rides should be delivered sooner and this might not happen.

Financial implications

None

Other considerations

None

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

- Underlines the role that transport plays in air pollution (not just greenhouse gas emissions).
- Acknowledge that each council is undertaking work on this topic.

Disadvantages

- None

Financial implications

None
Other considerations
none.

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

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

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

TCC's LTP for investment in Bus Infrastructure (including Park and Rides) and the PT Services & Infrastructure Business Case and the Managed Lane study being underway.

These projects will feed into the Implementation Plan.

Theme 3: Investment in Transport Infrastructure

Option 3A: Note the submissions, no changes to the Strategy. The SmartGrowth partnership, working across boundaries, continues to advocate for new funding and financing tools with central government reflective of government policy changes. Note: Investment priorities are to be informed by the new Government's Policy Paper on Land Transport (GPS) 2024-2027.

Theme 4: Transport for Ageing Population and Planning for all Abilities

Option 4B: Note the submissions, continue to work with the projects as per Option 4A, but do make some minor improvements to the SmartGrowth Strategy.

On page 117, paragraph 2, add: "Access includes catering for all ages and abilities, especially in light of anticipated demographic changes in the region. Councils have work underway in terms of infrastructure and service provision to reflect anticipated growth and demographic needs."

The Implementation Plan will need to reflect the need to track and provide input to the projects that are underway in the region on infrastructure and service provisions as growth occurs and demographics change.

Theme 5: Infrastructure for Walking and Cycling

Option 5A: No changes to the Strategy, as this theme is well-reflected on pages 115, 117 and 118. Existing work is underway through the TSP programme, including investment in walking and cycling, and will need to be embedded in the Implementation Plan

Theme 6: Car Parking

Option 6A: Note the submissions, no further changes to the SmartGrowth Strategy, as the Strategy refers to parking (e.g. page 115), and the TSP includes the topic of car parking. It is acknowledged that the TSP provides details on parking management for the region, while Tauranga's Parking Strategy provides more details for Tauranga City. TCC will continue to progress development of Parking Management Plans to ensure a balance in supply and demand for car parking.

WBOPDC will continue to provide off-street car parking facilities in the main town centres in accordance with the parking policy.

Theme 7: Managed Lanes

Option 7A: Note the submissions, no changes to the SmartGrowth Strategy as this is already reflected (e.g. pages 150 and 167).

Subject to the outcomes of both the Public Transport Services & Infrastructure Business Case and the Managed Lane Study, additional implementation budget may be necessary (to be confirmed on the outcomes of these studies).

Theme 8: Resilience

Option 8A: Noting the submissions and that the Strategy refers to resilience (pages 117, 118 and Appendix 1), make the following textual changes to the SmartGrowth Strategy to clarify the importance of resilience of the transport network:

- Add reference to resilience studies, policies and plans that have been/are being developed by each of the SmartGrowth partners and the importance on building upon these.
- Clarify that whilst the UFTI Connected Centres diagram shows a single connection between centres, network planning considers more than one physical route which promotes a resilient network.

SmartGrowth Partners are progressing resilience-based projects. The Implementation Plan can further identify those.

Theme 9: Ferries

Option 9A: Note the submissions, note the future option of ferries is referred in the Strategy (page 116), as well as in UFTI, the TSP and the RTPP. In line with decisions made at the Public Transport Committee meeting on 14 November 2023 to postpone further investment to the 2027 LTP, no further changes to be made.

Should opportunities arise earlier, this can be considered through the implementation plan.

Theme 10: Park and Ride Facilities

Option 10A: Note the submissions, no change to the SmartGrowth Strategy. The potential of Park and Ride facilities are already referenced in the SmartGrowth Strategy (e.g. page 116 and in Appendix 1) as well as in UFTI, the TSP and further work currently being undertaken through the Public Transport Services & Infrastructure business case.

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

Theme 11: Emissions and Air Pollution

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

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

Theme 12: Miscellaneous

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

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

Decision – Theme 1: Passenger Rail

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

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

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

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

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

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

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

Reason

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

Decision – Theme 2: Improved Public Transport

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

These projects will feed into the Implementation Plan.

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

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

- Clarify that whilst the UFTI Connected Centres diagram shows a single connection between centres, network planning considers more than one physical route which promotes a resilient network.

SmartGrowth Partners are progressing resilience-based projects. The Implementation Plan can further identify those.

Reason

- Better reflect the importance of the roading network to be resilient e.g. in the context of climate change.

Decision – Theme 9: Ferries

Option 9A: Note the submissions, note the future option of ferries is referred in the Strategy (page 116), as well as in UFTI, the TSP and the RPTP. In line with decisions made at the Public Transport Committee meeting on 14 November 2023 to postpone further investment to the 2027 LTP, no further changes to be made.

Should opportunities arise earlier, this can be considered through the implementation plan.

Reason

- Aligns with decision of the Public Transport Committee (14 November 2023).

Decision – Theme 10: Park and Ride Facilities

Option 10A: Note the submissions, no change to the SmartGrowth Strategy. The potential of Park and Ride facilities are already referenced in the SmartGrowth Strategy (e.g. page 116 and in Appendix 1) as well as in UFTI, the TSP and further work currently being undertaken through the Public Transport Services & Infrastructure business case.

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

Reason

- No further spend on park and ride investigations outside of existing projects such as the PT infrastructure and services business case.

Decision – Theme 11: Emissions and Air Pollution

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

In addition to the targets on page 116 of the Strategy or the directives on page 118, include the importance of '*Reducing the impact of transport on*

air quality and emissions' to cross-relate with the Te Taiao Environment and Climate Resilience chapters.

Reason

- Underlines the role that transport plays in air pollution (not just greenhouse gas emissions).
- Acknowledge that each council is undertaking work on this topic.

Decision - Theme 12: Miscellaneous

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

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

Reason

- Keeps the Strategy long-term and enable potential prioritisations to happen based on current and future governments' priorities.

Date approved:

Approved by:

SmartGrowth Strategy 2023–2073

ISSUES AND OPTIONS PAPER

Rural

Author: Tracey Miller

Topic	SGS23-05 - Rural
Issue	<ol style="list-style-type: none">1. Ensuring the protection of rural land, in particular highly productive land2. Looking after rural communities3. Opportunities for rural residential / lifestyle living4. A more enabling approach for housing on rural properties

Staff Narrative

Overview of feedback received

Eight submissions were received on the Rural topic from:

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

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

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

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

The submissions can be categorised into the following themes:

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

Ensuring the protection of rural land

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

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

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

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

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

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

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

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

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

Looking after rural communities

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

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

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

Opportunities for rural residential / lifestyle living

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

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

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

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

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

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

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

A more enabling approach for housing on rural properties

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

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

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

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

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

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

Options overview

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

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

Option 1A: Investigate existing provisions in rural and rural residential chapters to determine if the existing provisions are appropriate for enabling housing (additional, secondary and minor dwellings) (Recommended)

Advantages

- Opportunity to consider providing more housing in the sub-region through more enabling rules in the rural zones
- Provide access to a greater range of housing typologies, i.e., minor dwellings for elderly parents on existing sections
- WBOPDC is undertaking a review of its District Plan and looking at priority plan change options, and has heard from its communities that they would like more opportunities to provide additional housing on their rural zoned land for family members and workers without having to go through consenting hurdles
- The current government issued in their pre-election campaign information on how to increase housing supply which included making it easier to provide for minor dwellings, this may be something councils are going to need to consider anyway.
- Onsite infrastructure provision could be deemed suitable in some circumstances and this shouldn't be a determining factor in reducing the opportunity for the supply of minor / additional dwellings.
- Roading infrastructure may be able to sustain the increase of minor / additional dwellings.

Disadvantages

- Infrastructure availability and suitability e.g., water supply and wastewater
- Transportation impacts on rural roads
- Encouraging more housing on rural land will change the rural character and amenity of the rural zone unless appropriately screened / controlled
- Reverse sensitivity issues as described above
- Uncertainty of whether creating more enabling rules will result in a worthwhile uptake of additional, secondary and minor dwellings
- The existing City / District Plans do currently allow for additional, secondary and minor dwellings e.g., there is a consenting pathway where it can be demonstrated that it is appropriate. Therefore a review of the Plans may not result in any meaningful changes.
- It is noted that secondary dwellings are a permitted activity in the Tauranga City area.
- Staff resourcing / capacity to undertake this work with existing full workloads
- Need to consider NPS-HPL requirements, in particular the protection of highly productive land.

Financial implications

Staff resourcing to consider request

Other considerations

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

Option 1B: Note the submissions and make no changes

Advantages

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

Disadvantages

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

Financial implications

None

Other considerations

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

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

Recommended Decision

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

Option 1A: Investigate existing provisions in the sub-region's rural and rural residential chapters to determine if the existing provisions are appropriate for enabling housing (additional, secondary and minor dwellings)

Reason

- Opportunity to consider providing more housing in the sub-region through more enabling rules in the rural zones
- Provide access to a greater range of housing typologies, i.e., minor dwellings for elderly parents on existing sections
- WBOPDC is undertaking a review of its District Plan and looking at priority plan change options, and has heard from its communities that they would like more opportunities to provide additional housing on their rural zoned land for family members and workers without having to go through consenting hurdles
- The current government issued in their pre-election campaign information on how to increase housing supply which included making it easier to provide for minor dwellings, this may be something councils are going to need to consider anyway.

Decision

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

Option 1A: Investigate existing provisions in the sub-region's rural and rural residential chapters to determine if the existing provisions are appropriate for enabling housing (additional, secondary and minor dwellings)

Reason

- Opportunity to consider providing more housing in the sub-region through more enabling rules in the rural zones
- Provide access to a greater range of housing typologies, i.e., minor dwellings for elderly parents on existing sections
- WBOPDC is undertaking a review of its District Plan and looking at priority plan change options, and has heard from its communities that they would like more opportunities to provide additional housing

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

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

Date approved:

Approved by:

SmartGrowth Strategy 2023–2073

ISSUES AND OPTIONS PAPER

Urban Form and Centres

Author: Carl Lucca

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

Staff Narrative
<p><u>Overview of feedback received</u></p> <p>Issue 1: Support for the proposed urban form and centres approach</p> <p>11 submitters have indicated general support for Section 6: Urban Form and Centres. Five of the submissions state that investment is required to support the proposed urban form and centres approach, particularly as it relates to movement.</p> <p>Issue 2: Open space provision</p> <p>Three submitters raise the need to consider provision of open space to support the proposed urban form and centres approach. This includes the need for a city-wide amenity in the form of a botanic garden, and a query regarding the status of a 'Te Tumu Regional Park'.</p> <p>Issue 3: Opposition to the urban form and centres approach</p> <p>20 submitters have stated they do not support the approach to urban form and centres, raising the following specific matters:</p> <ul style="list-style-type: none"> • There is no clear vision for the city centre • Concerns regarding urban sprawl and associated costs • The need to support growth with appropriate infrastructure and planning • The need to support 'hyperlocal' communities • The need to protect the iconic nature of Mount Maunganui North • The need to better reflect the existing commercial centres hierarchy (considered as part of issue 4 below) • Reconsideration of UFTI's connected centres approach • Contradictions between growth numbers for the Western Corridor. <p>Issue 4: Commercial centres</p> <p>Six submitters identify issues related to commercial centres, specifically in relation to the hierarchy and status of centres shown (including Wairakei, Gate Pā and Tauranga Crossing), and the need for a sub-regional commercial strategy (commercial hierarchy study).</p>

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

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

Option 1A: Note the submissions and make no changes (recommended)

Advantages

- As outlined within the Strategy, retaining the proposed urban form and centres approach will assist to respond to anticipated growth. Increasing housing density over time in existing urban areas and new growth areas will maximise development around centres, transport hubs, and corridors. Localised placemaking through spatial planning will emphasise improved amenities, restored and enhanced environmental assets, incorporating cultural values, diverse transportation choices, and addressing housing needs.
- The Transport System Plan (TSP) includes ongoing improvements to the sub-region's transport system of roads, rail, public transport, walking, cycling, parking and travel demand management.
- It is acknowledged that investment is required to support the proposed urban form and centres approach, particularly as it relates to movement. The need for 'radical change to the delivery, funding and financing model for growth has been identified' as a key directive, to support transport and urban form related outcomes.

Disadvantages

- Nil

Financial implications

Nil.

Other considerations: Nil

Issue 2: Open space provision

Option 2A: Note the submissions and make no changes (recommended)

Advantages

- Recognition for the need to support existing and future community wellbeing through provision of appropriate open space is **well captured within the Strategy and considered adequate**. This includes a key growth

Disadvantages

- Nil

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

<p>Advantages</p> <ul style="list-style-type: none"> As outlined by the submitters, a city-wide botanic garden, has the potential to have a range of community and environmental benefits. 	<p>Disadvantages</p> <ul style="list-style-type: none"> This matter is most appropriately considered as part of either TCC's or WBoPDC's Long Term Plan process and related open spaces strategies. Significant financial costs, including land acquisition, infrastructure development, ongoing maintenance, and staffing. A botanic garden is not identified within existing strategies and the proposal does not take account of existing TCC and WBoPDC place-based strategies for open space and recreation provision. Opportunity costs for other uses in where land resource may be scarce.
<p>Financial implications</p> <p>This matter is most appropriately considered as part of either TCC's or WBoPDC's Long Term Plan process and related open spaces strategies. A proposed botanic garden or similar facility would have significant financial implications, including both initial capital investment (site and development) and ongoing operational expenditure. Operational expenditure in previous studies has indicated more than \$600,000 per year (2009 costs, not accounting for inflation).</p>	
<p>Other considerations:</p> <p>The submitter specifically notes that the Greerton Racecourse Reserve may be suitable for a botanic garden. It is noted that the recent Greerton Maarawaewae Study has confirmed that the Golf Course will remain, with further access for the community; the balance of the land is subject to a business case for the future of Tauranga Hospital, whereby the site is a possible location for future health facilities and recreation space. It is also noted that TCC manages the Sydenham Botanic Park; however, it is assumed that the botanic garden sought within the submissions is of a larger, more comprehensive scale.</p>	

Issue 3: Opposition to the urban form and centres approach

Option 3A: Note the submissions and make no changes (recommended)

<p>Advantages</p> <ul style="list-style-type: none"> As outlined within the Strategy, retaining the proposed urban form and centres approach will assist to respond to anticipated growth. Increasing housing density over time in existing urban areas and new growth areas 	<p>Disadvantages</p> <ul style="list-style-type: none"> Nil
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will maximise development around centres, transport hubs, and corridors. Localised placemaking through spatial planning will emphasise improved amenities, restored and enhanced environmental assets, incorporating cultural values, diverse transportation choices, and addressing housing needs.

- It is estimated that between 37,000 and 43,000 new homes will need to be built over the next 30 years within the western Bay of Plenty subregion to meet housing demand, comprising a mix of detached and attached dwellings. Tauranga City will require another 30,000 to 34,000 new houses and Western Bay of Plenty District another 7,000 to 9,000 new houses for its future population. This demand is set within a context of a highly constrained environment that is subject to natural hazards, the effects of climate change and the need to protect and enhance the natural environment. The proposed urban form and centres approach provides both an up (intensification) and out (greenfield) response required to respond to growth needs of the sub region.
- The strategic approach to growth builds on the SmartGrowth Strategy 2013 approach and 2018 Future Development Strategy, both of which included full public consultation. These were premised on provision of greenfield Urban Growth Areas and the need to encourage a more compact urban form, with this approach remaining consistent through the Urban Form and Transport Initiative (refer below) and the current draft Strategy. Notwithstanding, the current draft Strategy also responds relevant changes (e.g., central government policy, market maturity in delivering higher density, and so forth) that continue to occur over time and influence implementation of the strategic outcomes.
- It is noted Structure planning and spatial planning will continue to be developed by TCC and WBoPDC for identified growth areas; and that TCC's City Centre Action and Investment Plan provides a clear vision for the city centre.
- Matters relating to the Commercial Centres Hierarchy are responded to below.

Financial implications	
Nil	
<p>Other considerations:</p> <p>Submissions raise matters relating to the need for reconsideration of UFTI’s connected centres approach, including further assessment of previous options considered. The submission questions why the connected centres approach was the preferred option. The ‘SmartGrowth Strategy Scenarios’ report outlines the process stepped through assess options considered (including descriptions of those options and criteria considered); the report can be found at: https://www.smartgrowthbop.org.nz/articles/smartgrowth-strategy-2023-background.</p> <p>The report states that “Programme 2 – Connected Urban Villages, performed better than the other options in the assessments undertaken. However, while the philosophy behind Connected Urban Villages (Programme 2) was sound, the programme could not be completely delivered in its original form. The constraints mapping indicated that future development potential at scale is limited to the Eastern and Western corridors—and if necessary, the Northern Corridor—but only with considerable care and potentially some loss of productive soils. Balancing these factors, UFTI concluded that the optimal programme was a combination of Connected Urban Villages (Programme 2) and Two Urban Centres (Programme 3).... ‘Connected Centres’ combines the principles of the two programmes to develop an optimal and integrated land use and transport programme to be delivered over the next 50 years and beyond.”</p>	
<p>Option 3B: Reinvestigate an alternate urban form and centres approach for the sub-region, that responds to matters raised by submitters, including:</p> <ul style="list-style-type: none"> • the need for reconsideration of UFTI’s connected centres approach (including further assessment of previous options considered) • reducing urban sprawl and associated costs • providing growth with appropriate infrastructure and planning • Supporting ‘hyperlocal’ communities • Protect the iconic nature of Mount Maunganui North 	
<p>Advantages</p> <ul style="list-style-type: none"> • Detailed re-investigation could provide a more comprehensive understanding of the opportunities and challenges of different areas, providing more detail and direction on outcomes infrastructure, planning and community outcomes. 	<p>Disadvantages</p> <ul style="list-style-type: none"> • The proposed urban form approach builds on significant and recently completed work, including the Urban Form and Transport Initiative and Transport Systems Plan. It is important to balance the benefits with the practical constraints of time, resources, and the overarching goals of an urban growth strategy. • As outlined in the ‘SmartGrowth Strategy Scenarios’ report, a comprehensive approach to assess options has been considered (including descriptions of those options and criteria considered); the report can be found at:

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

- The current strategy, based on best practice urban form and supported by key directives, aims to address key concerns such as reducing urban sprawl, ensuring appropriate infrastructure and planning, and supporting local communities.
- Re-investigation will be time-consuming and resource-intensive, causing delays in the formulation and implementation of the urban growth strategy. Further detailed work in relation to supporting infrastructure and planning, potential growth areas, specific localised community outcomes (hyperlocal communities) and centres-based outcomes (such as Welcome Bay) will be provided for through structure planning, spatial planning, local area and community planning. Much of this work is underway in the form of spatial planning, Action and Investment Plans and Long Term Plan preparation.
- 'Hyperlocal communities' is a concept that can be facilitated through proactive engagement with communities as local planning occurs with those communities. This is supported through the 15minute neighbourhood concept integrated into the Strategy.
- Excessive detail might lead to overemphasis on specific areas, neglecting the broader regional context and potentially hindering the adaptability of the strategy.
- Recognition of the values of Mount Maunganui North are appropriately recognised through the Mount to Arataki Spatial Plan and Tauranga City Plan processes, which include assessment of coastal character, cultural view shafts and other relevant matters. Plan Change 33 is currently subject to the outcomes of the hearings process, with recommended decisions from the Independent Hearings Panel anticipated in March 2024.

Financial implications	
Reinvestigation would require significant operational expenditure to progress, including consultant fees and engagement costs.	
Other considerations: refer above; in relation to values of Mount Maunganui North, this matter has been considered through the Mount to Arataki Spatial Plan and Plan Change 33 processes.	
Option 3C: Make amendments to the SmartGrowth Strategy 2023 to respond to contradictions between growth numbers for the Western Corridor.	
Advantages <ul style="list-style-type: none"> • Nil 	Disadvantages <ul style="list-style-type: none"> • No change to the growth numbers for the Western Corridor is considered necessary – the housing numbers in the Strategy have been informed by the Housing and Business Capacity Assessment and information from the councils. It is noted in the Strategy that the wider Western Corridor area, which includes Tauriko West and Keenan Road, is being investigated as a Specified Development Project under the Urban Development Act 2020. Changes in the extent, timing, type, and scale of urban development may follow from this.
Financial implications	
There are no direct financial implications.	
Other considerations: Nil	

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

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

in terms of developing a detailed sub-regional commercial centres strategy. This will form part of the Implementation Plan supporting this strategy". This will assist with ongoing refinement of commercial and local area planning, economic sustainability of centres, transport and community planning.

- Providing for the changes to the status of status of Wairakei, Gate Pā and Tauranga Crossing without further consideration of the wider sub-regional commercial hierarchy and context may result in predetermined outcomes that are not based on a consistent approach of all centres and therefore erroneous. As such, it is considered appropriate to develop a detailed sub-regional commercial centres strategy and update the SmartGrowth Strategy in due course, when this is completed.
- It is recommended that the Centres hierarchy work be completed by TCC and WBoPDC, with collaboration between the Council's and with SmartGrowth Partners as appropriate through the processes (acknowledging that each Council will have local considerations and stakeholders to engage with through their respective processes.
- The proposed approach will provide for appropriate engagement with partners and key stakeholders through the process, which may otherwise not occur with changes to the centres through the current process.
- Based on the above, it is recommended that an additional Urban form and centres directive be added, as follows: *"Working with partners and key stakeholders, prepare and implement a Commercial Centres Hierarchy for the sub-region, to assist in future planning and decision making."* The method of preparing the Commercial Centres Hierarchy shall worked through with TCC and WBoPDC and in conjunction with their existing work programmes.

Financial implications

Costs associated with undertaking the Centres Hierarchy study.

Other considerations: TCC and WBoPDC will prepare a Commercial Centres Hierarchy assessment as part of proposed district and city plan changes proposed. TCC have recently approved a City Plan work programme including a Commercial and Industrial Plan Change. This will include the need to

complete a Commercial Centres Hierarchy and respond to direction provided by the national Policy Statement on urban Development and National Planning Standards. Any work undertaken in this regard will be considered at a sub-regional level.

Option 4C: Update the status of Wairakei, Gate Pā and Tauranga Crossing commercial centres status in response to the submissions received.

Advantages

- it is acknowledged that there is a need for further work on a commercial strategy, in the form of a Centres Hierarchy Study that considers the hierarchy at a sub-regional scale. This will assist with ongoing refinement of commercial and local area planning, economic sustainability of centres, transport and community planning.
- Updating the status of particular centres has the potential to provide key stakeholders with some further certainty as to their status.

Disadvantages

- Notwithstanding the advantages, without the prerequisite assessment, this information may still be subject to change and it is inappropriate to change any single centre without a full assessment. This includes engagement with a wide range of partners and key stakeholders.
- Without the required assessment as part a Commercial Centres Hierarchy study (taking into account wider hierarchy and contextual analysis), there is potential that a change may not correctly reflect the future proposed hierarchy. This may lead to impacts on policy decision making and investment.
- Further work is required on a commercial strategy in the form of a Centres Hierarchy Study that considers the hierarchy at a sub-regional scale. This will assist with ongoing refinement of commercial and local area planning, economic sustainability of centres, transport and community planning.
- It is recommended that the Centres hierarchy work be completed by TCC and WBoPDC, with collaboration between the Council's and with SmartGrowth partners as appropriate through the processes (acknowledging that each Council will have local considerations and stakeholders to engage with through their respective processes).
- The proposed approach will provide for appropriate engagement with partners and key stakeholders through the process, which may not otherwise occur with changes to the centres through the current process.

Financial implications

Costs associated with undertaking the Centres Hierarchy study.

Other considerations: TCC and WBoPDC will prepare a Commercial Centres Hierarchy assessment as part of proposed district and city plan changes proposed. TCC have recently approved a City Plan work programme including a Commercial and Industrial Plan Change. This will include the need to complete a Commercial Centres Hierarchy and respond to direction provided by the national Policy Statement on urban Development and National Planning Standards. Any work undertaken in this regard will be considered at a sub-regional level.

It is also noted that the Strategy has reflected as much of Plan Change 33 as possible, noting that the decisions may change this. Plan Change 33 is currently subject to the outcomes of the hearings process, with recommended decisions from the Independent Hearings Panel anticipated in March 2024.

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

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

determine if additional upgrades or space is required.” Outcomes for open space and amenities are also supported through the Social Infrastructure section.

- TCC’s and WBOPDC’s open space, parks and reserves management and planning documents support this outcome through a programme of open space enhancements, including identifying improvements to reserves, open space networks and determining if additional upgrades or space is required.

Decision: Issue 3: Opposition to the urban form and centres approach

Option 3A: Note the submissions and make no changes

Reason

- As outlined within the Strategy, retaining the proposed urban form and centres approach will assist to respond to anticipated growth. Increasing housing density over time in existing urban areas and new growth areas will maximise development around centres, transport hubs, and corridors. Localised placemaking through spatial planning will emphasise improved amenities, restored and enhanced environmental assets, incorporating cultural values, diverse transportation choices, and addressing housing needs.
- It is estimated that between 37,000 and 43,000 new homes will need to be built over the next 30 years within the western Bay of Plenty subregion to meet housing demand, comprising a mix of detached and attached dwellings. Tauranga City will require another 30,000 to 34,000 new houses and Western Bay of Plenty District another 7,000 to 9,000 new houses for its future population. This demand is set within a context of a highly constrained environment that is subject to natural hazards, the effects of climate change and the need to protect and enhance the natural environment. The proposed urban form and centres approach provides both an up (intensification) and out (greenfield) response required to respond to growth needs of the sub region.
- The strategic approach to growth builds on the SmartGrowth Strategy 2013 approach and 2018 Future Development Strategy, both of which included full public consultation. These were premised on provision of greenfield Urban Growth Areas and the need to encourage a more compact urban form, with this approach remaining consistent through the Urban Form and Transport Initiative and the current draft Strategy. Notwithstanding, the current draft Strategy also responds relevant changes (e.g., central government policy, market maturity in delivering higher density, and so forth) that continue to occur over time and influence implementation of the strategic outcomes.
- It is noted Structure planning and spatial planning will continue to be developed by TCC and WBoPDC for identified growth areas; and that TCC’s City Centre Action and Investment Plan provides a clear vision for the city centre.
- Further detailed work in relation to supporting infrastructure and planning, potential growth areas, specific localised community outcomes (hyperlocal communities) and centres-based outcomes (such as Welcome Bay) will be provided for through structure planning, spatial planning, local area and

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

Date approved:

Approved by:

SmartGrowth Strategy 2023–2073

ISSUES AND OPTIONS PAPER

Topic Lead: Steve Hurley

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

Staff Narrative

Overview of feedback received.

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

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

Issue 1: Three Waters Reform

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

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

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

Issue 2: Water Supply Analysis and Availability

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

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

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

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

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

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

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

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

Issue 3: Electricity Generation and Supply

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

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

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

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

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

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

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

Issue 2: Water Supply Analysis and Availability

- i. **Option 2A (Recommended)** Provide additional text in the draft SmartGrowth Strategy and FDS that recognises the need for ongoing investigation and analysis of potential alternate water sources for growth and increased resiliency.

Advantages

- Provides more information around how the management of water across the Western Bay of Plenty sub-region is planned.
- Provides a reference to Our Water Future joint initiative and 30-yr strategy documents
- Water supply is identified as a critical factor in sustainable development.

Disadvantages

- This level of detail is not required at this strategy level and is addressed in the TCC Draft 30-year Water Supply Strategy 2024-2054 which identifies urban growth and infrastructure provision as a major strategic challenge.

Financial implications

None identified

Other considerations

NPS-FM changes may allow for more streamlined consenting options

Option 2B: Retain the draft SmartGrowth Strategy and FDS text

Advantages

- The draft SmartGrowth strategy already highlights water supply as a key challenge and includes water supply related growth directives:
 - Key challenge: Increased demand on the potable water supply. It is noted that careful monitoring of existing resource consents is required to provide for this demand.
 - Growth Directive: Secure and protect long-term water availability for all our communities within environmental limits set in accordance with Te Mana o te Wai.
 - Growth Directive: Wastewater and water supply networks and treatment plants are managed across the sub-region to achieve efficient and effective investment to service planned urban growth.
- This level of detail is not required at this strategy level and is addressed in the TCC Draft 30-year Water Supply Strategy 2024-2054 which identifies urban growth and infrastructure provision as a major strategic challenge.

Disadvantages

- Work being undertaken under TCC Draft 30-year Water Supply Strategy 2024-2054 is not specifically highlighted or referenced.

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

Issue 3: Electricity Generation and Supply

Option 3A: Retain the draft Smartgrowth Strategy and FDS text and Map 15

<p>Advantages</p> <ul style="list-style-type: none"> The draft SmartGrowth strategy already highlights power as a key challenge and includes a power related growth directive: <ul style="list-style-type: none"> Development planning is co-ordinated with electricity transmission and supply, and connectivity coverage. 	<p>Disadvantages</p> <ul style="list-style-type: none"> SmartGrowth strategy and FDS does not specifically reference the NPS-ET as a relevant National Policy Statement or specifically demonstrate how the strategy has been informed by this. Does not include an assessment of the extent to which electricity supply is sufficient to support development. Does not specifically identify the National Grid within the constraints analysis (Part 3, Chapter 1) or differentiate the nationally significant National Grid transmission lines and substations from the electricity distribution network.
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Financial implications

None identified.

Other considerations

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Option 3B: (Recommended) Amend the draft SmartGrowth Strategy and FDS text to incorporate Powerco and Transpower distribution and transmission capacity with planned network expansion. Update Map 15 to differentiate the National Grid from the electricity distribution network.

- I. Update SmartGrowth Strategy to include reference to NPS-ET and demonstrate how the strategy has been informed by the policy (Part 3, Chapter 1 onwards).
- II. Add NPS-ET to the requirements chart (page 47, Part 3, Chapter 1) to include the National Grid.

III. Amend Map 15 to differentiate the nationally significant National Grid transmission lines and substations from the electricity distribution network.

Advantages

- Strategy and FDS clearly reference and demonstrate how the strategy has been informed by NPS-ET.
- National Grid considered as part of constraints analysis.
- Maps clearly differentiate the national grid asset from the local distribution network.

Disadvantages

- Map becomes cluttered and difficult to interpret.
- Potentially significant input required with Transpower to undertake constraints analysis.

Financial implications

N/A

Other considerations

Recommended Decisions

Issue 1: Three Waters Reform

Option 1B: Amend the draft FDS text to reflect the changing status of water reform under the coalition government.

Update page 122 of the strategy to remove reference to entities and replace with Local Water Done Well references with return of ownership back to local authorities.

Issue 2: Water Supply Analysis and Availability

Option 2A Provide additional text in the draft SmartGrowth Strategy and FDS that recognises the need for ongoing investigation and analysis of potential alternative water sources for growth and increased resiliency.

Add bullet points under “Key Three Waters and other infrastructure challenges” (page 124) to reference the need for consenting of existing water takes and add references to “Our Water Future” strategy

Issue 3: Electricity Generation and Supply

Option 3B: Amend the draft SmartGrowth Strategy and FDS text to incorporate Powerco and Transpower distribution and transmission capacity with planned network expansion. Update Map 15 to differentiate the National Grid from the electricity distribution network.

- I. Update Map 15 to differentiate the National Grid from the electricity distribution network.
- II. Add NPS-ET to requirements (page 47)
- III. Expand point 8 (page 124) to reference the Transpower’s Western Bay of Plenty Development Plan and note the increase in demands anticipated

Decision – Issue 1: Three Waters Reform

Option 1B: Amend the draft FDS text to reflect the changing status of water reform under the coalition government.

This includes updating page 122 of the strategy to remove reference to entities and replace with Local Water Done Well references with return of ownership back to local authorities.

Reason

- Reflects the direction currently being indicated by the coalition government.
- Removes the contention surrounding water reforms.

Decision – 2: Water Supply Analysis and Availability

Option 2A Provide additional text in the draft SmartGrowth Strategy and FDS that recognises the need for ongoing investigation and analysis of potential alternative water sources for growth and increased resiliency.

This adds bullet points under “Key Three Waters and other infrastructure challenges” (page 124) to reference the need for reconsenting of existing water takes and add references to “Our Water Future” strategy

Reason

- Provides more information around how the management of water across the Western Bay of Plenty sub-region is planned.
- Provides a reference to Our Water Future joint initiative and 30-yr strategy documents
- Water supply is identified as a critical factor in sustainable development.

Decision –Issue 3: Electricity Generation and Supply

Option 3B: Amend the draft SmartGrowth Strategy and FDS text to incorporate Powerco and Transpower distribution and transmission capacity with planned network expansion. This includes:

- i. Updating Map 15 to differentiate the National Grid from the electricity distribution network.
- ii. Adding NPS-ET to requirements (page 47)
- iii. Expanding point 8 (page 124) to reference the Transpower’s Western Bay of Plenty Development Plan and note the increase in demands anticipated

Reason

- Strategy and FDS clearly reference and demonstrate how the strategy has been informed by NPS-ET.
- Maps clearly differentiate the national grid asset from the local distribution network.

Date approved:

Approved by:

SmartGrowth Strategy 2023–2073

ISSUES AND OPTIONS PAPER

Economic Wellbeing

Author: Greg Simmonds

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

Staff Narrative
<p><u>Overview of feedback received</u></p> <p>3 submitters generally support the Strategy, with 2 noting particular support for the recognition given to how interconnected the WBOP subregion is with the upper North Island and the importance of taking an integrated approach to planning.</p> <p>4 submitters have provided general comments noting the importance of the Port of Tauranga; the need for affordable housing to retain talent; the interest and role of Māori land trusts in contributing to economic development; and the role Te Puke could play in supporting housing and industrial development.</p> <p>7 submitters oppose the strategy.</p> <p>Issue 1: Oppose the Strategy.</p> <p>4 submitters generally oppose the Strategy.</p> <p>Issue 2: Incorporate greater emphasis on environmental sustainability.</p> <p>1 submitter (Julian Richmond Fitter) proposes the Strategy places greater emphasis on the protection and enhancement of the environment when considering economic development opportunities.</p> <p>Issue 3: Recognise and support existing industrial activity.</p> <p>1 submitter (Golden Bay, a Division of Fletcher Concrete & Infrastructure Ltd) has proposed adding a new economic objective that recognises and supports existing industrial activities contributing to the regional and national economy.</p> <p>Issue 4: Region's role in the upper North Island.</p> <p>1 submitter (Beth Willard Bowden) notes Tauranga's place in the 'golden triangle' is not adequately acknowledged.</p> <p>Issue 5: Data source for employment figures.</p>

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

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

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

Issue 1: Oppose the strategy.**Option 1A:** Note the submissions and make no changes. **Recommended option.****Advantages**

- N/A

Disadvantages

- N/A

Financial implications

N/A

Other considerations

The 4 submissions generally opposed to the Strategy either propose no changes or provide no commentary for the Strategy to address. Therefore, noting the submissions and making no changes to the Strategy is the only viable option.

Issue 2: Changes to the Strategy to incorporate greater emphasis on environmental sustainability.

Option 2A: Continue with Strategy as drafted but noting clear actions to deliver a more sustainable regional economy that enhances and protects the environment and mitigates the impact of climate change will be picked up in the Strategy Implementation Plan under Economic Development Directive number 5: *Transition to a low carbon, circular economy*, and Economic Development Directive number 6: *Economic Development - supports environmental protection and enhancement*. **Recommended option.**

Advantages

- The Strategy already contains strong statements regarding the importance of environmental sustainability to maintaining a competitive regional economy. Two of the six Economic Development Directives (Directives 5 & 6) specifically reference significant environmental sustainability goals.

Disadvantages

- The specifics as to how the economic development strategy will enhance environmental sustainability are not articulated in detail.

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

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

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

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

Option 5A: Note the submission and make no change.

Advantages

- None.

Disadvantages

- No source for the employment data in the chart on page 136 is provided.

Financial implications

N/A

Other considerations

N/A

Option 5B: Add the data source for employment figures on page 136. The data source is: SmartGrowth Housing and Business Capability Assessment, 2022. **Recommended option.**

Advantages

- Source for the employment data on page 136 is provided.

Disadvantages

- None

Financial implications

N/A

Other considerations

N/A

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

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

Reasons for recommendation

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

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

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

Reasons for recommendation

Clarity

Decision

(To be completed in the decision-making meeting)

Reason

(To be completed in the decision-making meeting)

Date approved:

Approved by:

SmartGrowth Strategy 2023–2073

ISSUES AND OPTIONS PAPER

Social Infrastructure

Topic Leads: Sonya McCall/Rebecca Gallagher

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

Staff Narrative

Overview of feedback received:

12 submitters raised 16 submission points on *Chapter 10 – Social Infrastructure and Wellbeing*. Two submitters raised additional issues relating to Social Infrastructure and Wellbeing at the hearings on 4 and 5 December 2023, being SocialLink and Tauranga National Council of Women.

These submission points can be categorised into the following themes:

1. Planning for people
2. Quality of urban spaces in delivery of Connected Centres
3. Location and use of community centres, halls and marae
4. Coordination of provision of community healthcare and education

Planning for people

Concern has been raised around a lack of planning for people, and there appears to be some uncertainty from submitters around what facilities fall within “social infrastructure”.

Social Infrastructure is described and defined in various ways and locations throughout the Strategy. There is no clear description in *Chapter 10 – Social Infrastructure and Wellbeing* of what social infrastructure is. We have recommended in the options table under Issue 1 the inclusion of a description of social infrastructure in this chapter.

On page 17, the Strategy defines objectives to address the four well-beings. For social wellbeing, the following two objectives are noted:

- Enable and shape an inclusive, safe, sustainable, efficient and more vibrant urban form.
- Enable and support sufficient housing supply in existing and new urban areas to meet current and future needs, this includes a range of housing types, tenures and price points.

Neither of these relate to the provision of social infrastructure. We have recommended in the options table under Issue 2 an additional objective relating to social infrastructure.

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

Quality of urban spaces in delivery of Connected Centres

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

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

Location and use of community centres, halls and marae

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

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

Coordination of provision of community healthcare and education

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

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

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

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

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

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

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

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

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

Options overview

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

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

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

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

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

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

Advantages

- Provides consistency and clarity on what is meant by the term “Social Infrastructure”.
- The proposed definition aligns the various definitions and descriptions of social infrastructure throughout the strategy:
 - “Social and Community Infrastructure” is defined on p176 of the Strategy as “Community infrastructure is defined in s197 of the LGA 2002 meaning land, or development assets on land, owned or controlled by the territorial authority for the purpose of providing public amenities. Social infrastructure extends to services provided by Central Government such as schools and healthcare.”
 - In the “key urban form and centres challenges” section (p103), social infrastructure is partially defined within the text as “social infrastructure levels of service (e.g., parks, pools, libraries, halls, theatres and sports field) continues to increase as intensification and greenfield development occurs”.
 - Chapter 4 – Te Taiao – Our Environment also lists some social infrastructure as follows:
 - Challenge 2 - “population growth and intensification increases demand for recreation facilities, open spaces, green space and parks”.

Disadvantages

- The proposed definition is broader than is currently contained in Tauranga City and Western Bay of Plenty District Council’s infrastructure strategies. Each councils Infrastructure Strategy uses a slightly narrower definition, in part due to the purpose of those strategies and differences in the networks.

The existing definitions are:

SmartGrowth Strategy – Draft for Consultation - 2023 - 2073

Social and Community Infrastructure - Community infrastructure is defined in s197 of the LGA 2002 meaning land, or development assets on land, owned or controlled by the territorial authority for the purpose of providing public amenities. Social infrastructure extends to services provided by Central Government such as schools and healthcare^[1].

Tauranga City Council - 2024 Draft Infrastructure Strategy

Social and civic infrastructure includes parks and reserves, libraries, pools, community centres, indoor sports centres, and halls. They are places for us to connect, to learn, to play and stay healthy. They contribute to the development of successful, accessible centres. They provide safe and inclusive spaces that allow cultural expression and provide opportunities for people of all ages and backgrounds to be inspired and to thrive. They are integral to our future planning, and our ability to achieve good place[1]based outcomes for all of our communities across the city^[2].

Tauranga City Council – Our Public Places Strategic Plan 2023

<ul style="list-style-type: none"> ▪ Our environment growth directives - 1. An interconnected network of open spaces, reserves and ecological corridors is developed. ○ Chapter 10: Social Infrastructure “- where they can connect, socialise, learn and participate in a wide range of social, cultural, art, sporting and recreational activities, as well as broader support for community wellbeing”. The body of the chapter specifically addresses healthcare, education, rural communities (community halls, marae, schools and open spaces), and uses a case study of sub-regional parks and Te Manawataki or Te Papa. 	<p><i>Social infrastructure - Public spaces, facilities and institutions that support social interaction and wellbeing within a community</i>^[3].</p> <p>Western Bay of Plenty District Council - Infrastructure Strategy 2021 <i>Social infrastructure (community facilities, services and networks that help individuals, families, groups and communities)</i>^[4].</p> <p>^[1] SmartGrowth Strategy 2023-2073 Draft for consultation (tauranga.govt.nz) – Page 176</p> <p>^[2] draft-infrastructure-strategy.pdf (tauranga.govt.nz) – Page 113</p> <p>^[3] our-public-places-strategic-plan.pdf (tauranga.govt.nz) – Page 24</p> <p>^[4] Infrastructure Strategy.pdf (westernbay.govt.nz) - Page 14</p>
Financial implications	
N/A	
Other considerations	
N/A	

Option 2: Note the submissions and make no changes.	
<p>Advantages</p> <ul style="list-style-type: none"> • There are already descriptions already contained within the strategy and it may be considered unnecessary. 	<p>Disadvantages</p> <ul style="list-style-type: none"> • Leaves the chapter to be slightly ambiguous as to what is meant by Social Infrastructure. • Does not respond to the issues raised by submitters.
Financial implications	
N/A	
Other considerations	
N/A	
Issue 2: Ensuring integration of social infrastructure within the strategy objectives and alignment between Chapter 10 and other chapters in the SmartGrowth strategy.	

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

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

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

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

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

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

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

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

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

Reference *Chapter 6 – Urban Form and Centres*.

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

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

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

Advantages

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

Disadvantages

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

Financial implications

N/A

Other considerations

N/A

Option 2: Note the submissions and make no changes.

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

Recommended Decision

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

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

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

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

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

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

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

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

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

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

Reference *Chapter 6 – Urban Form and Centres*.

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

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

Decision

(To be completed in the decision-making meeting)

Reason

(To be completed in the decision-making meeting)

Date approved:

Approved by:

SmartGrowth Strategy 2023–2073

ISSUES AND OPTIONS PAPER

Future Development Strategy

Authors: Nichola Lennard and Craig Batchelar

Topic	Part 4: Future Development Strategy
Issues	<ol style="list-style-type: none">1. Oppose2. Infrastructure Readiness3. Maps4. Support for the FDS5. Population Assumptions6. Settlement Pattern – Changes to Timing<ol style="list-style-type: none">6(1) Te Tumu,6(2) Tauriko West6(3) Keenan Rd7. Settlement Pattern – Adding Areas:<ol style="list-style-type: none">7(1) – Wairākei South7(2) – Tara Rd7(3) – Residential growth in the East7(4) – Residential growth in Te Puke7(5) – Residential growth for Welcome Bay and Upper Ohauti7(6) – Intensification7(7) – Staging of Long term Development in the Eastern Corridor and Western Corridor8. Settlement Pattern – Te Puna and surrounds9. FDS Implementation

Staff Narrative

Overview of feedback received

Overall there were 34 submissions received under the FDS topic from the following submitters:

- Linda
- Andrew Goodall
- Bill Basher
- John Sanderson
- Bruce Conlon
- Julian Fitter
- John Robson
- Child Poverty Action Group
- Urban Task Force
- Bell Road Ltd Partnership
- Transpower NZ Ltd
- Stephanie Smith-Kerr
- Aimee Palmer

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

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

The key issues from submissions are summarised as follows:

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

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

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

Issue 1: Oppose the Strategy

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

One submitter has opposed further greenfield development.

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

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

Issue 2: Infrastructure Readiness

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

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

Issue 3: Maps

Various amendments requested to the maps, including:

Correction required as Paengaroa is shown as Pongakawa.

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

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

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

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

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

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

Other minor updates and clarifications.

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

Issue 4: Support for the FDS

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

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

Issue 5: Population Assumptions

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

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

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

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

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

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

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

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

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

Issue 6: Settlement Pattern – Timing

6(1) – Te Tumu

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

6(2) – Tauriko West

Request for Tauriko West to be moved forward.

6(3) – Keenan Rd

Request for Keenan Rd to be moved forward.

Issue 7: Settlement Pattern – Additional Areas

7(1) – Wairākei South

Request to add Wairākei South to the FDS.

7(2) – Tara Rd

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

7(3) – Residential growth in the East

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

7(4): Residential growth in Te Puke

Request for immediate residential growth in the Te Puke township.

7(5) – Residential growth for Welcome Bay and Upper Ohauiti

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

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

7(6) – Intensification

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

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

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

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

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

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

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

Issue 8: Te Puna and surrounds

Pirirakau seeks an 'off limit' layer of Te Puna and Huharua involving Whakamarama. Property Council have requested that Te Puna be further investigated.

Issue 9: FDS Implementation

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

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

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

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

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

Options Overview

Issue 1: Oppose the Strategy

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

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

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

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

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

relative priority of growth in the corridors. Property Council concerned that insufficient work has been completed on the Eastern Corridor.

Option 7(7)A	Status Quo: Make no changes to the strategy to clarify the timing and status of the Eastern Centre and Western Corridor.
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Option 7(7)B	<p>Option 7(7)B: Provide Greater Clarity around Longer Term Areas (Recommended): Amend the residential allocation table to acknowledge that both the Eastern Centre and Western Corridor (Upper Belk Road) may be needed within the 30 year timeframe. Add a range of 1,000 - 4,000 houses into the long-term residential allocation column for the Eastern Centre and Upper Belk. Add a clear notation to the residential allocation table and on Map 18 that the timing for these areas is still subject to investigation. Amend maps to include Upper Belk Road as a Long-Term growth area. Be clear that Upper Belk Road is the next location for growth in the Western Corridor following Tauriko West and Keenan Rd. This is supported by the Industrial IOP which identifies Upper Belk Road as an area for business land in the long-term, and the supporting industrial land studies. Clarify the terminology around 'potential long-term growth area' and 'long-term growth areas' – ensure the maps align with these terms. Add the following footnote to Map 18: <i>Further work is required to determine staging, spatial extent and mix of land uses for the Eastern Centre and Western Corridor (Upper Belk Road)</i> Recommend that the Western Corridor be added as a Priority Development Area.</p>
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Option 7(7)C	<p>Option 7(5)C: Remove Wider Western Corridor and Eastern Centre from Map 18: Remove the Wider Western Corridor and Eastern Centre from the 30 year FDS map (Map 18) and display as longer term (30 years +) only</p>
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Issue 8: Te Puna and Surrounds
Request for an 'off limit' layer for Te Puna and Huharua involving Whakamarama. Requests that Te Puna be further investigated for development.

Option 8A	<p>Status Quo – no changes regarding Te Puna in the Strategy (recommended): Make no changes to the strategy. Note that Te Puna is not identified as a longer-term growth area in the FDS, however it is identified as a 'potential long-term growth area' on other maps. Refer submitters to the further work that WBOPDC are planning for Te Puna. Ensure that the spatial extent of Te Puna shown in the SmartGrowth maps aligns with the area WBOPDC are proposing to prepare the spatial plan for. Clarify the terminology around 'potential long-term growth area' and long-term growth areas.</p>
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Option 8B	<p>Remove Te Puna as a potential long-term growth area: Remove Te Puna as a 'potential long-term' growth area in the strategy.</p>
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Issue 9: FDS Implementation
Request for a Project Plan and Resourcing Plan to deliver the FDS. Request for clarity on how 'unanticipated' or 'out of sequence' development will be dealt with. Greater clarify on geographic extent of FDS and which areas are in or out,

eg rural villages in the East, Welcome Bay/Kairua. Requests that SmartGrowth partners should support implementation of the settlement pattern.

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

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

Issue 2: Infrastructure Readiness

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

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

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

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

Advantages

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

Disadvantages

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

Financial implications

None.

Other considerations:

Electricity

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

¹ See SmartGrowth Industrial Land Study – Further Investigations Report, October 2023: https://assets-global.website-files.com/639c0b75c31ac6442f8d9994/6570d71d5431d0853240f315_SmartGrowth%20Industrial%20land%20Study%20Further%20Information%20Report%20Oct%202023.pdf

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

Implementation and Funding

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

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

Plan Change 33 (Tauranga)

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

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

<p>Advantages</p> <ul style="list-style-type: none"> • Partly addresses the points raised by submitters and provides a pathway for dealing with the matters highlighted (eg the infrastructure staging plan / map could be addressed in the Implementation and Funding Plan) • Directs certain matters to the correct process (eg PC 33) • Addresses specific matters such as the Transpower submission points • Provides confidence that the strategy has considered key infrastructure matters. 	<p>Disadvantages</p> <ul style="list-style-type: none"> • Matters raised by submitters are not directly addressed in the Strategy and are referred to the Implementation and Funding Plan or other processes
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Financial implications

None

Other considerations:
Electricity

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

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

Implementation and Funding

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

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

Plan Change 33 (Tauranga)

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

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

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

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

Issue 5: Population Assumptions

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

² See SmartGrowth Industrial Land Study – Further Investigations Report, October 2023: https://assets-global.website-files.com/639c0b75c31ac6442f8d9994/6570d71d5431d0853240f315_SmartGrowth%20Industrial%20land%20Study%20Further%20Information%20Report%20Oct%202023.pdf

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

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

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

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

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

Advantages

Demographics

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

Projections

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

Disadvantages

Demographics

- Does not address concerns raised by submitters.

Projections

- Does not address concerns raised by submitters.

PC33

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

Implementation Plan for Māori Housing

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

Flexibility

supported by factual information. The matter of rural housing and intensification/infill has been addressed in the SmartGrowth Housing & Business Capacity Assessment 2022. The Strategy does provide a range for intensification and infill given that there are significant uncertainties.

PC33

- Avoids cross over with a separate RMA plan change process (noting that this is an uncertain area with the change of Government).

Implementation Plan for Māori Housing

- Allows for further work to be done through the Implementation and Funding Plan and time to consider these matters further

Flexibility

- Retains the current SmartGrowth Strategy approach for the FDS and avoids introducing too much uncertainty while acknowledging that a responsive approach can be taken (eg through Plan Change 6 to the RPS and future reviews of the FDS).

- Submitters may be of the view that there is insufficient flexibility built into the Strategy and therefore have ongoing concerns over the FDS.

Financial considerations

None

Other Considerations

Work is ongoing in terms of Tāngata Whenua Spatial Planning. This will include a Māori Housing component. The Housing System Plan will also cover Māori housing.

UFTI used a scenario based approach which is common in spatial planning. It set out a scenario of 400,000 people and provided the strategy over the next 30-50 years to address that level of growth. SmartGrowth takes the same approach. However, within the next 30 years we also require further detail on population projections so the Strategy relies on our evidence base, including the Housing and Business Assessment, to quantify an estimate of population growth over the next 30 years of between 246,000 and 318,000. We need to do this to meet the requirements of the NPS-UD. These two figures are not inconsistent.

Some submitters have raised the issue of TCC using an intensification figure of 19,000 for PC33 while SmartGrowth contains a different figure. The SmartGrowth Strategy contains a range for the intensification areas of between 11,400 – 15,000 houses. The reason for the difference is that PC33 is wider in geographic scope than the 'Intensification Areas' identified in SmartGrowth, and also includes intensification in greenfield areas.

Option 5B: Make the changes requested around demographics. Include further detail on different cohorts in the demographic figures. Provide greater clarity on the numbers used. Amend projections to reflect a greater level of growth in the rural areas to account for seasonal variations. Reduce the

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

Advantages

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

Disadvantages

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

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

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

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

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

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

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

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

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

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

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

Advantages	Disadvantages
<ul style="list-style-type: none"> • Partly addresses submitters concerns. • Acknowledges that Te Tumu is an important growth area for the strategy given its scale and location • Provides flexibility should infrastructure funding matters be resolved • Aligns with initial TCC decisions around LTP – noting that there is further information to come in this regard prior to deliberations • Allows for further work to be done through the Implementation Plan and time to consider these matters further 	<ul style="list-style-type: none"> • Misalignment between any plan change brought by Te Tumu and the staging set out in the Strategy

Financial implications

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

None
Other considerations: See considerations in options above.

Issue 6(2): Settlement Pattern Timing – Tauriko West

Request from the Urban Task Force to move the residential allocation for Tauriko West forward.

Option 6(2)A: Status Quo: Note the submissions and make no changes

<p>Advantages</p> <ul style="list-style-type: none"> Aligns with initial TCC decisions around their Draft Long-Term Plan Aligns with the information from TCC in terms of staging, noting that there is some flexibility with the staging table 	<p>Disadvantages</p> <ul style="list-style-type: none"> Doesn't give effect to submitters request to move the development forward
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Financial implications

None.

Other considerations:
 There will be an ability to review and update residential allocation figures when the FDS is reviewed in 3 years time. SmartGrowth has aligned with what has been put forward in the Draft LTPs. Under the NPS-UD, the FDS is required to be informed by relevant long-term plans and infrastructure strategies.
 The SmartGrowth Strategy has staged development for Tauriko West with some housing expected in the short-term. There is no current evidence that supports moving development any further forward given the land has not yet been rezoned.
 Note the text in option 6(1)C around the ability to move growth areas forward.

Option 6B: Move areas forward: Move Tauriko West forward in line with the request from the Urban Task Force.

<p>Advantages</p> <ul style="list-style-type: none"> Addresses submitters concerns. Signals that the partnership wants development to occur earlier 	<p>Disadvantages</p> <ul style="list-style-type: none"> Out of step with the TCC LTP and other infrastructure providers Residential allocations out of step with the information provided from TCC
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Financial implications

TCC LTP (i.e. pressure to include infrastructure for the areas moved forward in the strategy)

Other considerations: See above.

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

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

Advantages

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

Disadvantages

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

Financial implications

None

Other considerations: See considerations in options above.

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

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

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

Advantages

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

Disadvantages

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

Financial implications

None.

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

Other considerations: This matter directly relates to Tauranga City Council’s Long-Term Plan. The Draft LTP 2024-2034 has proposed changes to the timing of infrastructure investment that would delay the release of land for development in the Keenan Road and Te Tumu growth areas to around 2040. This is largely due to funding constraints. SmartGrowth has aligned with what has been put forward in the Draft LTP. Under the NPS-UD, the FDS is required to be informed by relevant long-term plans and infrastructure strategies.

Option 6(3)B: Move areas forward: Move Keenan Rd forward as requested by submitter.

- Advantages**
- Addresses submitters concerns.
 - Provides support and clear direction for Keenan Rd as a growth area
 - Provides certainty for the landowner to then seek a plan change to progress urban development of Keenan Rd.
 - Signals that the partnership wants development to occur earlier

- Disadvantages**
- Out of step with the TCC LTP and other infrastructure providers
 - Commits to infrastructure that is not able to be funded
 - Doesn’t meet the FDS requirements that development capacity needs to be aligned with supporting infrastructure or that an FDS must be informed by LTPs

Financial implications

TCC LTP (i.e. pressure to include infrastructure for the areas moved forward in the strategy)

Other considerations: See above.
Western Corridor Specified Development Project (SDP)⁵ – This is a Kāinga Ora led project which is currently underway. Recommendations have been made to the joint Ministers to establish the project as an SDP in early 2024. This area includes Tauriko West and Keenan Rd. Changes in the extent, timing, type, and scale of urban development may follow from this.

Option 6(3)C: Acknowledge ability to move areas forward (Recommended): No changes to the staging as set out in the Strategy but specific text to acknowledge that should infrastructure funding or other matters be addressed there is the potential for areas to be brought forward. Note the text in option 6(1)C around the ability to move growth areas forward.

- Advantages**
- Partly addresses submitters concerns.
 - Acknowledges that Keenan Rd is an important growth area for the strategy
 - Provides flexibility should infrastructure funding matters be resolved
 - Aligns with initial TCC decisions around Draft LTP

- Disadvantages**
- Doesn’t give effect to submitters request to move the development forward

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

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

Financial considerations

None

Other Considerations

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

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

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

- Under this option further information would be required to demonstrate how flooding, geotechnical and other natural hazard risk would be adequate avoided, remedied or mitigated. A pathway would still exist for the Bell Road Limited Partnership to seek a private plan change.
- The Bell Road Limited Partnership provided engineering, geotechnical and planning statements at the SmartGrowth hearings. These statements of evidence rely on a number of untested technical and expert conclusions in the face of known flooding, natural hazard risk and geotechnical issues identified by engineering staff at BOPRC, TCC and WBOPDC.
- The Bell Road catchment is currently serviced by a pumping scheme which indicates that flood risk is an existing issue. This suggests the Bell Road catchment is high risk and a precautionary approach should be adopted at this strategic planning step.
- While the location and transport benefits are acknowledged, these would not outweigh the wider issue of providing for urban growth in an overallocated stormwater catchment and resulting costs of resilience if development were to occur in a piece-meal fashion within the catchment.
- Acknowledgement of the Te Maru o Kaituna River Authority and the inconsistency of large-scale and incremental urban land use change in the surrounding and upstream catchments with the vision and objectives of the Kaituna River Document.
- Consideration of the likely requirements arising from the Proposed National Policy Statement for Natural Hazard Decision Making 2023

Option 7(1)B: Include Area: Identify Wairākei South as a ‘Potential long term growth area’ in Map 18 of the FDS**Advantages**

- Potentially addresses the housing and business land shortfall
- Provides additional future business land capacity within the Eastern growth corridor.
- The amount of additional business land required to be identified within the subregion by way of other potential long-term growth areas for business uses would be reduced.
- Provides certainty for the landowner (Bell Road Limited Partnership) to then seek a private plan change to progress any urban development

Disadvantages

- There is sufficient zoned business land within the Eastern growth corridor to meet expected demand over the next 30 years.
- While statements of geotechnical and engineering evidence were submitted to the hearing, this technical information does not substantiate the suitability of the land for urban development to be confirmed and that there will be no impact on the wider catchment..

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

<p>Advantages</p> <ul style="list-style-type: none"> • Bell Road is already identified as a possible site for industrial land in the draft FDS at page 149. • Partly addresses submitter requests around Wairākei South and Tara Rd – provides a pathway provided specific information is provided and constraints are overcome • Areas such as Wairākei South and Tara Rd align well with the Connected Centres approach • SmartGrowth is responsive to development proposals • By not amending the settlement pattern, it aligns with initial LTP decisions and other infrastructure planning • Maintains sufficient certainty around the FDS settlement pattern • Aligns with evidence-based decisions made around the FDS settlement pattern (including those relating to constraints) 	<p>Disadvantages</p> <ul style="list-style-type: none"> • Lost opportunity cost. • Downstream water quality and ecology effects on the Kaituna River and surrounding and lower catchment area which has been the benefit of substantial downstream restoration works. • Signals that development could be a possibility in this area where that may not prove to be the case
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Financial considerations

None

Other Considerations

- Proposed National Policy Statement for Natural Hazard Decision-making 2023
- Government Policy changes
- Bell Road is specifically referred to as a potential site at page 149 of the draft FDS along with the other possible sites deemed suitable for industrial land uses. The three yearly review of the FDS required by the NPS-UD allows for any additional potential growth areas to be included in the strategy should these be able to be supported.
- Under this option Wairākei South would be identified in some form in the FDS as subject to technical investigations. Future Proof included three other possible business land sites in their Strategy on a separate map as subject to further investigation.
- Acknowledgement of the Te Maru o Kaituna River Authority and the inconsistency of large-scale and incremental urban land use change in the surrounding and upstream catchments with the vision and objectives of the Kaituna River Document.

Issue 7(2): Settlement Pattern – Additional Areas: Tara Rd
Requested for changes to Map 3 and to Map 18 to include Tara Rd as part of the settlement pattern from Nga Potiki a Tamapahore Trust.
Note: Link to Industrial Land Issues and Options Paper which considers Wairākei South. The options outlined here align with the Industrial Land topic.
Option 7(2)A: Status Quo – Do not identify Tara Rd as a potential long term growth area for residential and/or business land in the current FDS (Recommended). Make no changes to the strategy to include the additional area. Defer the consideration of Tara Rd for urban development and in the

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

Advantages

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

Disadvantages

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

Financial considerations

None

Other Considerations

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

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

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

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

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

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

Advantages

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

Disadvantages

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

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

<ul style="list-style-type: none"> • Partly addresses submitter requests around Tara Rd – provides a pathway provided specific information is provided and constraints are overcome • Areas such as Wairākei South and Tara Rd align well with the Connected Centres approach • Supports a potential Māori development initiative at Tara Rd • SmartGrowth is responsive to development proposals • By not amending the settlement pattern, it aligns with initial LTP decisions and other infrastructure planning • Maintains sufficient certainty around the FDS settlement pattern • Aligns with evidence-based decisions made around the FDS settlement pattern (including those relating to constraints) 	<ul style="list-style-type: none"> • Downstream water quality and ecology effects on the Kaituna River and surrounding and lower catchment area which has been the benefit of substantial downstream restoration works. • Signals that development could be a possibility in this area where that may not prove to be the case
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Financial considerations

None

Other Considerations

- Proposed National Policy Statement for Natural Hazard Decision-making 2023
- Government Policy changes
- Tara Rd is specifically referred to as a potential site at page 149 of the draft FDS along with the other possible sites deemed suitable for industrial land uses. The three yearly review of the SmartGrowth Strategy/FDS required by the NPS-UD allows for any additional potential growth areas to be included in the strategy should these be able to be supported.
- Under this option Tara Rd would be identified in some form in the FDS as subject to technical investigations. Future Proof included three possible business land sites in their Strategy on a separate map as subject to further investigation.
- Acknowledgement of the Te Maru o Kaituna River Authority and the inconsistency of large-scale and incremental urban land use change in the surrounding and upstream catchments with the vision and objectives of the Kaituna River Document.

Issue 7(3): Settlement Pattern – Additional Areas: Residential growth in the East

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

Option 7(3)A: Status Quo – Make no changes to the strategy to include additional residential areas in the East (Recommended). Clarify in Part 4 (page 145) of the Strategy that the FDS relates to urban development: *The FDS relates to urban development only and does not consider rural development.*

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

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

Issue 7(4): Settlement Pattern – Additional Areas: Residential growth in Te Puke

Request for immediate residential growth in the Te Puke township.

Option 7(4)A: Status Quo (Recommended) – Make no changes to the strategy to include further development for Te Puke. Note that a spatial plan for Te Puke is underway.

Advantages

- Aligns with initial LTP decisions and other infrastructure planning
- Provides certainty around the FDS settlement pattern
- Aligns with evidence-based decisions made around the FDS settlement pattern
- Aligns with the position of the relevant SmartGrowth partners
- Ensures alignment with the Te Puke spatial planning process currently underway

Disadvantages

- SmartGrowth is seen as insufficiently responsive to development requests in the context of a significant housing and business land shortfall

Financial considerations

None

Other Considerations

Note that under Plan Change 92 (Medium Density Residential Standards) significant additional residential development is being enabled for Te Puke. A Spatial Plan for Te Puke is currently being progressed.

Option 7(4)B: Include Areas: Change the Settlement Pattern to include further growth in the Te Puke township.

Advantages

- Potentially addresses the housing shortfall

Disadvantages

- Misalignment with LTPs and other partner planning documents
- Out of step with the Te Puke Spatial Plan which is currently underway and will investigate appropriate growth locations within Te Puke

Financial considerations: Financial implications for the relevant council and infrastructure providers if this area is expanded

Other Considerations:

Note that under Plan Change 92 (Medium Density Residential Standards) significant additional residential development is being enabled for Te Puke. A Spatial Plan for Te Puke is currently being progressed.

Issue 7(5): Settlement Pattern – Additional Areas: Residential growth for Welcome Bay and Upper Ohauti

Request for the Upper Ohauti area to be identified as a lifestyle area (rural residential development) from LandPlay Ltd.

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

Option 7(5)A: Status Quo (Recommended) – Make no changes to the strategy to include the additional areas of Welcome Bay and Upper Ohauti.

Advantages

- Aligns with initial Draft TCC LTP and other infrastructure planning, noting that WBOPDC LTP has been delayed
- Aligns with the findings of the Welcome Bay and Ohauti Planning Study 2020
- Provides certainty around the FDS settlement pattern
- Aligns with evidence-based decisions made around the FDS settlement pattern (including those relating to constraints)
- Lowers the risk of ‘opening the door’ to developments that do not align with the FDS Connected Centres approach, this includes rural residential development as proposed for Upper Ohauti
- Provides a clear signal from SmartGrowth that those developments are not part of the FDS
- Protects rural land and avoids further fragmentation.

Disadvantages

- SmartGrowth is unresponsive to development requests in the context of a housing shortfall

Financial considerations

None

Other Considerations

- Welcome Bay and Ohauti Planning Study 2020, Tauranga City Council: <https://www.tauranga.govt.nz/our-future/enabling-growth/welcome-bay-and-ohauti-planning-study>. The Study found that accommodating medium and high growth housing scenarios would be unfeasible, except in the Upper Ohauti urban growth area (the part that falls within the TCC boundary). This conclusion largely derives from the costs of developing road infrastructure to cope with additional traffic generation. Existing traffic congestion in the Welcome Bay Road area, which includes buses using Welcome Bay Road, would be worsened in the medium and high growth scenarios.
- UFTI noted Welcome Bay/Ohauti as a potential opportunity post 30 years but added the proviso that there would only be limited growth due to infrastructure constraints and complex land ownership.
- Submitters under the Rural Issues and Options paper have raised the importance of protecting rural land.
- The FDS component of the SmartGrowth Strategy is focussed on urban development (as defined in the NPS-UD) – not rural residential.

Option 7(5)B: Include Areas: Change the Settlement Pattern to include the additional areas of Welcome Bay and Upper Ohauti

Advantages

- Potentially addresses some of the housing shortfall, noting this will be limited as only small numbers of houses are proposed and it will not provide the housing typology needed
- Provides certainty for the landowner to seek a plan change to progress development

Disadvantages

- Contrary to the findings of the Welcome Bay and Ohauti Planning Study 2020 – with resulting infrastructure and funding implications
- There are significant infrastructure servicing constraints. Self-servicing for three waters is proposed for the Upper Ohauti development.
- Puts pressure on councils in particular to include these areas in their planning documents
- Opens the door to developments that do not align with the Connected Centres settlement pattern
- Provides support for rural residential development which goes against the more compact approach being advanced in the strategy
- Unlikely to meet the definition of ‘well-functioning’ urban environments in the NPS-UD
- Could compromise longer-term growth options for this area if rural residential is allowed

Financial considerations: Financial implications for the relevant council and infrastructure providers if these areas are brought in

Other Considerations: See above

N/A

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

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

One submitter has questioned the levels of intensification and infill.

Concerns raised around PC33.

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

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

Advantages

- Would allow for an even more compact form of development
- Addresses housing shortfalls if the increased levels can be achieved
- Helps to meet Emissions Reduction Plan targets and supports modal shift goals.
- Strategy is clear about the impact of PC33 and provides direction.

Disadvantages

- There are some significant challenges to be overcome in order to achieve the intensification levels already set in the Strategy.
- Increasing the dwellings allocated to intensification areas further could have implications for other growth areas and the ability to adequately plan for growth.
- Could raise expectations around how much intensification can be achieved.
- Infrastructure not necessarily in place or planned to allow for significant increases in intensification.
- Cross over with the PC33 process and potential interference with a matter that is subject to a decision still to be made.

Financial considerations: Financial implications for the relevant council and infrastructure providers if intensification is increased further

Other Considerations: See above

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

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

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

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

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

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

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

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

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

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

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

Advantages

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

Disadvantages

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

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

Other Considerations:

Eastern Centre business case – this is currently underway and close to completion. The Eastern Centre is identified as a SmartGrowth Priority Development Area.
 Western Corridor Specified Development Project (SDP) Assessment⁸ – this is a Kāinga Ora led project which is currently underway.
 The Belk Rd Plateau area has been identified in TCC's 30 year Infrastructure Strategy.
 The Upper Belk area is within Western Bay of Plenty District.
 The SmartGrowth Strategy 2013 identified both of these areas as 'land not currently identified in Settlement Pattern, but subject to Strategic Investigation'.
 The Proposed FDS 2018 included the Eastern Corridor and Western Corridor as 'Investigation for Possible Urban Growth Areas'.
 UFTI identified both areas as 'Envisioned Growth Areas – 30 Years +'.
 The Western Corridor Strategic Study in 2016 identified Upper Belk as a location for possible urbanisation should growth demand continue strongly.
 See also Urban Form and Centres Background Paper which covers the work behind the long-term growth areas.⁹

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

⁹ https://assets.website-files.com/639c0b75c31ac6442f8d9994/6500fbcbbdd0554259e3bf98_Urban%20Form%20and%20Centres%20Background%20Paper%20-%20FINAL.pdf

Option 7(7)C: Remove Wider Western Corridor and Eastern Centre from Map 18: Remove the Wider Western Corridor and Eastern Centre from the 30 year FDS map (Map18) and display as longer term (30 years +) only

Advantages

- Less confusing by not including the two longer term areas
- Areas have no specific commitment to infrastructure in the LTP
- Text reflects that these areas may need to be brought forward
- No expectations around which of these longer term areas will occur in the next 30 years
- Allows further detail to be added once investigations have been completed

Disadvantages

- Lack of certainty over longer term development
- Doesn't meet the NPS-UD requirements to provide sufficient capacity over the next 30 years

Financial considerations: None

Other Considerations:

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

Western Corridor Specified Development Project (SDP) Assessment ¹⁰ – this is a Kāinga Ora led project which is currently underway.

Issue 8: Te Puna

Request for an 'off limit' layer for Te Puna and Huharua involving Whakamarama.

Requests that Te Puna be further investigated for development.

Option 8A: Status Quo (Recommended): Make no changes to the strategy. Note that Te Puna is not identified as a longer-term growth area in the FDS, however it is identified as a 'potential long-term growth area' on other maps. Refer submitters to the further work that WBOPDC are planning for Te Puna. Ensure that the spatial extent of Te Puna shown in the SmartGrowth maps aligns with the area WBOPDC are proposing to prepare the spatial plan for. Clarify the terminology around 'potential long-term growth area' and long-term growth areas.

¹⁰ <https://specified-development-projects-kaingaora.hub.arcgis.com/pages/western-corridor>

<p>Advantages</p> <ul style="list-style-type: none"> • Maintains the current settlement pattern as outlined in the FDS section. • Does not introduce changes at this stage of the process which may require further work. • Allows WBOPDC to determine their own approach for Te Puna in due course. 	<p>Disadvantages</p> <ul style="list-style-type: none"> • A lack of clarity in the strategy over whether Te Puna should be a long-term growth area or should be left undeveloped.
<p>Financial implications</p>	
<p>N/A</p>	
<p>Other considerations</p>	
<p>Potential WBOPDC spatial plan for Te Puna. Note that Te Puna was identified as a potential growth area for investigation in the SmartGrowth Strategy 2013 and in UFTI, however there were earlier SmartGrowth decisions that development should be directed away from this area. Implementation and Funding Plan could signal that further work needs to be undertaken on Te Puna.</p>	
<p>Option 8B: Remove Te Puna: Remove Te Puna as a 'potential long-term' growth area in the strategy.</p>	
<p>Advantages</p> <ul style="list-style-type: none"> • Sends a clear signal from a sub-regional strategy that Te Puna should be protected, consistent with earlier SmartGrowth decisions to direct urban development away from Te Awanui/Tauranga Harbour due to impacts on natural resources and cultural values. • Provides clarity and certainty. 	<p>Disadvantages</p> <ul style="list-style-type: none"> • There are a number of viewpoints on whether Te Puna should be developed or not. Insufficient work has been done to determine an approach. • Cuts across any approach that WBOPDC might take with the Te Puna spatial plan. • Moves away from the approach outlined in UFTI without sufficient discussion among the SmartGrowth partners on what the implications of this are.
<p>Financial implications</p>	
<p>N/A</p>	
<p>Other considerations</p>	
<p>WBOPDC proposed Spatial Plan for Te Puna. Note that Te Puna was identified as a potential growth area for investigation in the SmartGrowth Strategy 2013 and in UFTI, however there were earlier SmartGrowth decisions that development should be directed away from this area.</p>	

Issue 9: FDS Implementation

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

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

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

Requests that SmartGrowth partners should support implementation of the settlement pattern.

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

Option 9A: Status Quo (Recommended): Make only minor changes to the strategy and refer other matters to the Implementation and Funding Plan. This includes putting Map 19 (Western Bay of Plenty Housing) into the Implementation and Funding Plan rather than the FDS section of the Strategy. Add the following text to Part 4 (FDS) to clarify effect of SmartGrowth and the FDS: *Local authorities must have regard to the FDS when preparing or changing RMA planning documents; and is strongly encouraged to use the relevant FDS to inform long-term plans, and particularly infrastructure strategies; regional land transport plans and any other relevant strategies and plans.*

Advantages

- Allows for further work to be done through the Implementation and Funding Plan and time to consider these matters further
- Change 6 to the RPS provides the policy approach for 'unanticipated' and 'out of sequence' developments – avoids duplication or misalignment.
- A number of matters raised are of detail that is best dealt with through other processes and not in the strategy itself (eg agreements to support the settlement pattern, feasibility assessments etc).
- The NPS UD has a specific requirement for an FDS "Implementation Plan" that sits outside the FDS, providing greater flexibility for delivery to respond to changes in the operating environment.
- Moving the detailed housing map (Map 19) into the Implementation and Funding Plan allows for this to be updated on a regular basis.

Disadvantages

- Lack of clarity on how the strategy will address some of these matters through implementation
- Limited direction in the strategy itself on how 'unanticipated' or 'out of sequence' development requests will be dealt with.

Financial implications N/A

Other considerations

Submitters have raised the need for several corrections to Map 19 (Western Bay of Plenty Housing). This has highlighted the issue of this map becoming out of date very quickly. Submitters under this issue have also raised the need for flexibility and being agile. Moving Map 19 into the Implementation and Funding Plan would assist with this.

Option 9B: Make changes to the strategy: Include detail around what is likely to be in the implementation and funding plan and more information on how 'unanticipated' or 'out of sequence' development requests will be dealt with.

Advantages

- Provides greater clarity over how matters will be addressed in the Implementation and Funding Plan
- Provides clear direction *on* how 'unanticipated' or 'out of sequence' development requests will be dealt with.

Disadvantages

- Could commit the partners to a course of action in the Implementation and Funding Plan that is still to be worked through and decided
- Duplication or misalignment with Change 6 to the RPS
- Cumbersome processes for making changes to implementation and delivery plans.

Financial implications N/A

Other considerations N/A

Recommended Decisions
Issue 2: Infrastructure Readiness
<p>Option 2B: Make small changes to infrastructure information in the Strategy: Note that the strategy contains a number of directives around infrastructure being put in place to support development.</p> <p>Direct some of the requests contained in the submissions to the Implementation and Funding Plan or to other processes (eg PC33 as a separate statutory process).</p> <p>Make changes to include reference to NPS-ET in the 'Requirements' diagram on page 47 and refer to background papers and other information.</p>
Issue 5: Population Assumptions
<p>Option 5A: Status Quo – no change to demographics: Note the submissions and make only minor changes to the Strategy. Provide clarity on areas where concerns have been raised. Note that further work on demographics, including disaggregating more general demographic change information, will be undertaken through the implementation phase. This will feed into specific programmes (eg housing and transport). Acknowledge the work that is underway in terms of infrastructure and service provision that is suitable and accessible for all abilities. Refer other matters such as Māori Housing to the Implementation and Funding Plan. Refer concerns over PC33 to that process.</p>
Issue 6(1): Settlement Pattern – Timing: Te Tumu
<p>Option 6(1)C: Acknowledge ability to move areas forward: No changes to the staging as set out in the Strategy but specific text to acknowledge that should infrastructure funding and other matters be addressed there is the potential for areas to be brought forward. Be clear that Te Tumu is still a high priority growth area. Add text to Part 4 (FDS), 'Residential Growth Allocations for the next 30 years' (page 146) as follows: <i>There is the ability for the staging of growth areas to change. In particular, certain growth areas may be brought forward in time provided infrastructure funding or other matters are addressed.</i> Add the following footnote to Te Tumu in the Residential Growth Allocations table: <i>Te Tumu remains a high priority growth area for the SmartGrowth Strategy. The timing of this area may be brought forward if infrastructure funding and other matters are addressed. SmartGrowth and the relevant councils will continue to work with the Te Tumu landowners on progressing this growth area.</i></p>
Issue 6(2): Settlement Pattern – Timing: Tauriko West
<p>Option 6(2)C: Acknowledge ability to move areas forward: No changes to the staging as set out in the Strategy but specific text to acknowledge that should infrastructure funding and other matters be addressed there is the potential for areas to be brought forward.</p>

Issue 6(3): Settlement Pattern – Timing: Keenan Rd
Option 6(3)C: Acknowledge ability to move areas forward: No changes to the staging as set out in the Strategy but specific text to acknowledge that should infrastructure funding and other matters be addressed there is the potential for areas to be brought forward.
Issue 7(1): Settlement Pattern – Additional Areas: Wairākei South
Option 7(1)A: Status Quo – Do not identify Wairākei South as a potential long term growth area for residential and/or business land in the current FDS. Make no changes to the strategy to include the additional area. Defer the consideration of Wairākei South for urban development and in the first instance, to consider catchment management options to manage natural hazard risk and ecology and water quality effects in the wider catchment including the Kaituna River.
Issue 7(2): Settlement Pattern – Additional Areas: Tara Rd
Option 7(2)A: Status Quo – Do not identify Tara Rd as a potential long term growth area for residential and/or business land in the current FDS. Make no changes to the strategy to include the additional area. Defer the consideration of Tara Rd for urban development and in the first instance, to consider catchment management options to manage natural hazard risk and ecology and water quality effects in the wider catchment including the Kaituna River.
Issue 7(3): Settlement Pattern – Additional Areas: Residential Growth in the East
Option 7(3)A: Status Quo – Make no changes to include additional residential areas in the East
Issue 7(4): Settlement Pattern – Additional Areas: Residential Growth in Te Puke
Option 7(4)A: Status Quo – Make no changes to include further development for Te Puke. Note that a spatial plan for Te Puke is underway.
Issue 7(5): Settlement Pattern – Additional Areas: Residential growth for Welcome Bay and Upper Ohauti
Option 7(5)A: Status Quo – Make no changes to the strategy to include the additional areas.
Issue 7(6): Settlement Pattern – Additional Areas: Intensification
Option 7(6)A: Status Quo – no changes to the intensification numbers in the Strategy Make no changes to the intensification numbers in the strategy. Add the following statement in Part 4 (FDS) at page 145: <i>It is the intention of the Strategy to achieve a more compact urban form through the Connected</i>

Centres Development Strategy. The aim is to target at least 40% of new development through intensification and infill over time.

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

Option 7(7)B: Provide Greater Clarity around Longer Term Areas (Recommended):

Amend the residential allocation table to acknowledge that both the Eastern Centre and Western Corridor (Upper Belk) may be needed within the 30 year timeframe. Add a range of 1,000 – 4,000 houses into the long-term residential allocation column for the Eastern Centre and Upper Belk. Add a clear notation to the residential allocation table and on Map 18 that the timing for these areas is still subject to investigation. Amend maps to include Upper Belk as a Long-Term growth area. Be clear that Upper Belk is the next location for growth in the Western Corridor following Tauriko West and Keenan Rd. This is supported by the Industrial IOP which identifies Upper Belk as an area for business land in the long-term, and the supporting industrial land studies.

Clarify the terminology around ‘potential long-term growth area’ and ‘long-term growth areas’ – ensure the maps align with these terms.

Add the following footnote to Map 18: *Further work is required to determine staging, spatial extent and mix of land uses for the Eastern Centre and Upper Belk.*

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

Issue 8: Te Puna and Surrounds

Option 8A: Status Quo – no changes regarding Te Puna in the Strategy:

Make no changes to the strategy. Note that Te Puna is not identified as a longer-term growth area in the FDS, however it is identified as a ‘potential long-term growth area’ on other maps. Refer submitters to the further work that WBOPDC are planning for Te Puna. Ensure that the spatial extent of Te Puna shown in the SmartGrowth maps aligns with the area WBOPDC are proposing to prepare the spatial plan for. Clarify the terminology around ‘potential long-term growth area’ and long-term growth areas.

Issue 9: FDS Implementation

Option 9A: Status Quo – only minor changes to the Strategy and refer other matters to the implementation and funding plan:

Make only minor changes to the strategy and refer other matters to the Implementation and Funding Plan. This includes putting Map 19 (Western Bay of Plenty Housing) into the Implementation and Funding Plan rather than the FDS section of the Strategy. Add the following text to Part 4 (FDS) to clarify effect of SmartGrowth and the FDS: *Local authorities must have regard to the FDS when preparing or changing RMA planning documents; and is strongly encouraged to use the relevant FDS to inform long-term plans, and particularly infrastructure strategies; regional land transport plans and any other relevant strategies and plans.*

Decision – Issue 2: Infrastructure Readiness

Option 2B: Make small changes to infrastructure information in the Strategy

Note that the strategy contains a number of directives around infrastructure being put in place to support development. Direct some of the requests contained in the submissions to the Implementation and Funding Plan or to other processes (eg PC33 as a separate statutory process). Make changes to include reference to NPS-ET in the 'Requirements' diagram on page 47 and refer to background papers and other information.

Reason

- Addresses some of the points raised by submitters and provides a pathway for dealing with key matters (eg the infrastructure staging map could be addressed in the Implementation and Funding Plan).
- Directs certain matters to the correct process (eg PC33)
- Addresses specific matters such as the Trnaspower submission points
- Provides confidence that the strategy has considered key infrastructure matters.

Decision – Issue 5: Population Assumptions

Option 5A: Status Quo – no changes to demographics:

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

Reason

Demographics

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

Projections

- The SmartGrowth Strategy projections are evidenced based. Not making changes ensures that the Strategy remains robust and supported by factual information. The matter of rural housing and intensification/infill has been addressed in the SmartGrowth Housing & Business Capacity Assessment 2022. The Strategy does provide a range for intensification and infill given that there are significant uncertainties.

PC33

- Avoids cross over with a separate RMA plan change process (noting that this is an uncertain area with the change of Government).

Implementation Plan for Māori Housing

- Allows for further work to be done through the Implementation and Funding Plan and time to consider these matters further

Flexibility

- Retains the current SmartGrowth Strategy approach for the FDS and avoids introducing too much uncertainty while acknowledging that a responsive approach can be taken (eg through Plan Change 6 to the RPS and future reviews of the FDS).

Decision – Issue 6(1): Settlement Pattern – Timing: Te Tumu**Option 6(1)C: Acknowledge ability to move areas forward (recommended):**

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

Reason

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

<ul style="list-style-type: none"> Allows for further work to be done through the Implementation Plan and time to consider these matters further
Decision – Issue 6(2): Settlement Pattern – Timing: Tauriko West
<p>Option 6(2)C: Acknowledge ability to move areas forward:</p> <p>No changes to the staging as set out in the Strategy but specific text to acknowledge that should infrastructure funding and other matters be addressed there is the potential for areas to be brought forward.</p>
Reason
<ul style="list-style-type: none"> Partly addresses submitters concerns. Provides flexibility should infrastructure funding matters be resolved Aligns with initial TCC decisions around Draft LTP Allows for further work to be done through the Implementation Plan and time to consider these matters further
Decision – Issue 6(3): Settlement Pattern – Timing: Keenan Rd
<p>Option 6(3)C: Acknowledge ability to move areas forward:</p> <p>No changes to the staging as set out in the Strategy but specific text to acknowledge that should infrastructure funding and other matters be addressed there is the potential for areas to be brought forward.</p>
Reason
<ul style="list-style-type: none"> Partly addresses submitters concerns. Acknowledges that Keenan Rd is an important growth area for the strategy Provides flexibility should infrastructure funding matters be resolved Aligns with initial TCC decisions around Draft LTP Allows for further work to be done through the Implementation Plan and time to consider these matters further
Decision – Issue 7(1): Settlement Pattern – Additional Areas: Wairākei South
<p>Option 7(1)A: Status Quo – Do not identify Wairākei South as a potential long term growth area for residential and/or business land in the current FDS. Make no changes to the strategy to include the additional area. Defer the consideration of Wairākei South for urban development and in the first instance, to consider catchment management options to manage natural hazard risk and ecology and water quality effects in the wider catchment including the Kaituna River.</p>
Reason
<ul style="list-style-type: none"> Aligns with evidence-based decisions made around the FDS settlement pattern (including those relating to constraints) Identifies that a catchment level approach is required to manage flood risk in the Bell Road catchment.

- Maintains the SmartGrowth position that supports a 'Go Carefully' approach to this area.
- Aligns with initial LTP decisions and other infrastructure planning (ie these areas have not been accounted for in LTPs)
- Lowers the risk of 'opening the door' to developments that may not be viable due to natural hazard constraints
- Aligns with the position of the relevant SmartGrowth partners
- Provides a potential pathway to the submitter for future consideration of the proposed Wairākei South urban growth area.
- Under this option consideration of Wairākei South for urban development would be deferred to the next FDS review in three years to enable catchment management options to manage natural hazard risk in the wider catchment and surrounding area to be evaluated.

Decision - Issue 7(2): Settlement Pattern – Additional Areas: Tara Rd

Option 7(2)A: Status Quo - Do not identify Tara Rd as a potential long term growth area for residential and/or business land in the current FDS.

Make no changes to the strategy to include the additional area. Defer the consideration of Tara Rd for urban development and in the first instance, to consider catchment management options to manage natural hazard risk and ecology and water quality effects in the wider catchment including the Kaituna River.

Reason

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

Decision - Issue 7(3) Settlement Pattern – Additional Areas: Residential growth in the East

<p>Option 7(3)A: Status Quo – make no changes to include additional residential areas in the East: Make no changes to the strategy to include the additional areas. Clarify in Part 4 (page 145) of the Strategy that the FDS relates to urban development: <i>The FDS relates to urban development only and does not consider rural development.</i></p>
<p>Reason</p>
<ul style="list-style-type: none"> • Aligns with initial LTP decisions and other infrastructure planning • Provides certainty around the FDS settlement pattern • Aligns with evidence-based decisions made around the FDS settlement pattern • Lowers the risk of ‘opening the door’ to developments that do not align with the FDS Connected Centres approach, this includes incremental rural residential development • Areas at Paengaroa and Pongakawa do not meet the definition of “urban environment” under the NPS UD (must be >10,000 people) for inclusion in the FDS. • Aligns with the position of the relevant SmartGrowth partners • Provides a clear signal from SmartGrowth that those developments are not part of the FDS • Avoids cross over with a separate RMA private plan change process (Private Plan Change 95 – Pencarrow Estate, Pongakawa)
<p>Decision – Issue 7(4) Settlement Pattern – Additional Areas: Residential growth in Te Puke</p>
<p>Option 7(4)A: Status Quo - Make no changes to the strategy to include further development for Te Puke. Note that a spatial plan for Te Puke is underway.</p>
<p>Reason</p>
<ul style="list-style-type: none"> • Aligns with initial LTP decisions and other infrastructure planning • Provides certainty around the FDS settlement pattern • Aligns with evidence-based decisions made around the FDS settlement pattern • Aligns with the position of the relevant SmartGrowth partners • Ensures alignment with the Te Puke spatial planning process currently underway
<p>Decision – Issue 7(5) Settlement Pattern – Additional Areas: Residential growth for Welcome Bay and Upper Ohauti</p>
<p>Option 7(5)A: Status Quo – no changes to include Welcome Bay and Upper Ohauti</p>
<p>Reason</p>
<ul style="list-style-type: none"> • Aligns with initial Draft TCC LTP and other infrastructure planning, noting that WBOPDC LTP has been delayed

- Aligns with the findings of the Welcome Bay and Ohauti Planning Study 2020
- Provides certainty around the FDS settlement pattern
- Aligns with evidence-based decisions made around the FDS settlement pattern (including those relating to constraints)
- Lowers the risk of 'opening the door' to developments that do not align with the FDS Connected Centres approach, this includes rural residential development as proposed for Upper Ohauti
- Provides a clear signal from SmartGrowth that those developments are not part of the FDS
- Protects rural land and avoids further fragmentation.

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

Option 7(6)A: Status Quo – no changes to the intensification numbers in the Strategy (recommended):

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

Reason

- Aligns with the HBA which provides the evidence base for the SmartGrowth Strategy.
- Aligns with initial LTP decisions and other infrastructure planning
- The Strategy already acknowledges there is significant uncertainty on the dwelling allocations for intensification and has included a range for intensification to reflect that.
- The Strategy is reviewed every 3 years and can be adjusted if greater levels of intensification are achieved.
- Avoids cross over with a separate RMA plan change process underway through PC33 (noting that this is an uncertain area with the change of Government).

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

Option 7(7)B: Provide Greater Clarity around Longer Term Areas (Recommended):

Amend the residential allocation table to acknowledge that both the Eastern Centre and Western Corridor (Upper Belk Road) may be needed within the 30 year timeframe. Add a range of 1,000 - 4,000 houses into the long-term residential allocation column for the Eastern Centre and Upper Belk Road. Add a clear notation to the residential allocation table and on Map 18 that the timing for these areas is still subject to investigation. Amend maps to include Upper Belk Road as a Long-Term growth area. Be clear that Upper Belk Road is the

next location for growth in the Western Corridor following Tauriko West and Keenan Rd. This is supported by the Industrial IOP which identifies Upper Belk Road as an area for business land in the long-term, and the supporting industrial land studies.

Clarify the terminology around 'potential long-term growth area' and 'long-term growth areas' – ensure the maps align with these terms.

Add the following footnote to Map 18: *Further work is required to determine staging, spatial extent and mix of land uses for the Eastern Centre and Western Corridor (Upper Belk Road)*

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

Reason

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

Decision – Issue 8: Te Puna

Option 8A: Status Quo: Make no changes to the strategy. Note that Te Puna is not identified as a longer-term growth area in the FDS, however it is identified as a 'potential long-term growth area' on other maps. Refer submitters to the further work that WBOPDC are planning for Te Puna. Ensure that the spatial extent of Te Puna shown in the SmartGrowth maps aligns with the area WBOPDC are proposing to prepare the spatial plan for. Clarify the terminology around 'potential long-term growth area' and long-term growth areas.

Reason

- Maintains the current settlement pattern as outlined in the FDS section.
- Does not introduce changes at this stage of the process which may require further work.
- Allows WBOPDC to determine their own approach for Te Puna in due course.

Decision – Issue 9: FDS Implementation

Option 9A: Status Quo: Make only minor changes to the strategy and refer other matters to the Implementation and Funding Plan. This includes putting Map 19 (Western Bay of Plenty Housing) into the Implementation and Funding Plan rather than the FDS section of the Strategy. Add the

following text to Part 4 (FDS) to clarify effect of SmartGrowth and the FDS: *Local authorities must have regard to the FDS when preparing or changing RMA planning documents; and is strongly encouraged to use the relevant FDS to inform long-term plans, and particularly infrastructure strategies; regional land transport plans and any other relevant strategies and plans.*

Reason

- Allows for further work to be done through the Implementation and Funding Plan and time to consider these matters further
- Change 6 to the RPS provides the policy approach for ‘unanticipated’ and ‘out of sequence’ developments – avoids duplication or misalignment.
- A number of matters raised are of detail that is best dealt with through other processes and not in the strategy itself (eg agreements to support the settlement pattern, feasibility assessments etc).
- The NPS UD has a specific requirement for an FDS “Implementation Plan” that sits outside the FDS, providing greater flexibility for delivery to respond to changes in the operating environment.
- Moving the detailed housing map (Map 19) into the Implementation and Funding Plan allows for this to be updated on a regular basis.

Date approved:

Approved by:

SmartGrowth Strategy 2023–2073

ISSUES AND OPTIONS PAPER

Future Development Strategy – Business Industrial Land

Author: David Phizacklea

Topic	Industrial Land
Issue	<ol style="list-style-type: none">1. General – Potential future industrial land areas2. General – Providing for existing industrial activities3. Potential Future Business Area – Wairākei South4. Potential Future Business Area – Ōmokoroa/Apata5. Potential Future Business Area – Te Puna6. Potential Future Business Area – Te Puke

Staff Narrative

Overview of feedback received

Eight submissions were received on the industrial land topic from:

- Thwaites, Donald Alan – submitter 49
- Te Puke Economic Development Group – submitter 64
- Golden Bay, A Division of Fletcher Concrete & Infrastructure – submitter 66
- Waste Management NZ – submitter 74
- Clear the Air & Tauranga Moana Fumigant Group – submitter 78
- Urban Task Force – submitter 81
- SmartGrowth – submitter 82
- Bell Road Limited Partnership – submitter 83.

Issue 1: General – Potential future industrial land areas

Four submitters sought new or alternative future potential business land locations be identified. These are addressed as separate issues for Bell Road/Wairākei South, Ōmokoroa/Apata, Te Puna and Te Puke. In addition, one submitter (SmartGrowth) sought specific additional wording to Map 18 of the draft FDS.

One submitter (Clear the Air) seeks provision for heavy industry in specific suitable locations to enable the long-term relocation of existing heavy industry emitters where those activities are located in unsuitable locations.

Issue 2: General – Providing for existing industrial activities

Several submitters sought that the SmartGrowth Strategy better recognise existing industrial activities, with one submitter seeking that the impact of industrial activities be recognised.

Golden Bay seeks recognition of existing industrial activities in the SmartGrowth Strategy. They seek amendments to ensure the operational and functional need of industrial activities on industrial land within the Port of Tauranga are supported, and that industrial activities are recognised for their contribution to both the

economy and assisting in housing delivery both at a regional and national level. Golden Bay also seek amendments to the draft SmartGrowth Strategy to provide for the continued development and intensification of existing industrial land to protect business and industrial land, which they consider will in turn assist in the growth of the regional and national economy and assist in housing supply.

Clear the Air & Tauranga Moana Fumigant Group seek that provision is made for heavy industry in specific suitable locations to enable the long term relocation of existing heavy industry emitters where those activities are located in unsuitable locations. They also seek that zoning and plan provisions be aligned with the National Planning Standards to differentiate light medium and heavy industry zones, and that integration between land use and regional plan provisions for air and water quality occur.

Waste Management NZ is concerned with providing for existing heavy industry and considers it is unclear how the SmartGrowth Strategy intends on meeting anticipated demand for industrial land. They seek:

- (a) equal recognition of existing industrial uses, particularly at the Truman Lane Site and the Oil Recovery Site, as well as recognition of the constraints industries face which otherwise hinders their ability to internalise all of their effects; and
- (b) recognition of the adverse health and amenity effects and reverse sensitivity effects, should residential housing be directed in proximity to effects-generating industrial activity.

Issue 3: Potential Future Business Area – Wairākei South

The Bell Road Limited Partnership submitted that no future industrial area has been identified in the draft FDS for the Eastern growth corridor. They consider that the Wairākei South area is suitable for urban development, and that engineering solutions are able to address flooding, coastal inundation risks and land quality and other constraints. A map is included as an appendix to their submission showing the Wairākei South land sought to be identified in the FDS for business employment and residential uses.

The Urban Taskforce states that no further business land has been identified in the strategy for the eastern/central corridor and considers that 60 ha of land needs to be brought forward [in this corridor]. They seek that further land is identified in the eastern/central corridor such as at Wairākei South to cater for future needs, and for the assessment tables on page 148 of the Strategy to be updated.

Issue 4: Potential Future Business Area – Ōmokoroa/Apata

Don Thwaites considers that further investigation of business land development at Apata is required.

Issue 5: Potential Future Business Area – Te Puna

Don Thwaites considers that Te Puna is not a suitable location for any further industrial activity, while the Tauranga Urban Taskforce seeks Te Puna be included as a short and medium term growth area for business employment land based on the technical assessment work underpinning the draft strategy.

Issue 6: Potential Future Business Area – Te Puke

Te Puke Economic Development Agency seeks that new industrial land is made available in the vicinity of the Te Puke township and that the existing Te Puke West zoned land is enabled through the consenting process.

Key considerations

1. The extent to which the FDS needs to signal where future business land ie. industrial land, should be located ahead of structure planning, servicing, funding and plan change processes.

It is recommended that the FDS provide certainty under the NPS-UD as to the potential locations for business land over the next 30 years, in the same manner as for residential growth areas.

2. Whether potential future growth areas for business land are shown in the Eastern growth corridor.

The HBA Business Capacity Assessment by Market Economics found there is sufficient existing zoned and planned industrial land in the Eastern growth corridor to meet the expected demand for business land over the next 30 years, including through the Rangiora Business Park. There is uncertainty as to the timing and additional business land requirements arising from the Eastern Town (Te Kāinga) and the timing of the delivery of business land in the Te Tumu growth area. Further information is required as to whether Wairākei South is suitable as a potential future business land location, given the flooding and other constraints within the Bell Road catchment.

3. The need for clear direction on Upper Belk Road for the FDS on whether Upper Belk Road should be residential, industrial or a mix of both.

The Government's SDP process under the Urban Development Act 2020 can be used to deliver on the growth requirements of this area. Kāinga Ora are expected to recommend to ministers a scenario which provides for 150-200ha of business land alongside residential housing. The need for business land in the Western growth corridor requires planning to commence as soon as possible in order to meet business land demand in the medium to longer-term.

The following documents which inform and support the draft FDS business land section should also be referred to (available from the SmartGrowth website at the links below):

- [SmartGrowth Industrial Land Study – Technical Report, June 2023](#)
- [SmartGrowth Industrial Land Study – Supplementary Report, May 2023](#)
- [SmartGrowth Industrial Land Study – Further Investigations, November 2023](#)

- [Tauranga City and Western Bay of Plenty Business Capacity Assessment December, 2022](#)

Options overview	
<p>Issue 1 General – Potential future industrial land areas</p>	<p><u>Option 1A:</u> Status Quo – Retain the draft FDS text and Map 18 locations showing potential long term growth areas for business land</p> <p><u>Option 1B:</u> Amend the draft FDS text showing potential long term growth areas for business land (Recommended)</p> <p><u>Option 1C:</u> Amend the Map 18 locations text (page 154) showing potential long term growth areas for business land</p> <p><u>Option 1D:</u> Retain the draft FDS text and Map 18 locations showing potential long term growth areas for business land, but include a notation and outline of possible other sites that may be suitable</p>
<p>Issue 2: General – Providing for existing industrial activities</p>	<p><u>Option 2A:</u> Status quo – Retain current wording of the SmartGrowth Strategy and FDS in relation to existing industrial activities</p> <p><u>Option 2B:</u> Insert additional text to recognise existing industrial activities and their effects (Recommended)</p>
<p>Issue 3: Potential Future Business Area – Bell Road/Wairākei South</p>	<p><u>Option 3A:</u> Status quo – Do not identify Wairākei South as a potential long term growth area for residential and/or business land in the FDS. (Recommended)</p> <p><u>Option 3B:</u> Identify Wairākei South as a ‘Potential long term growth area – business land’ in Map 18 of the FDS and in the Business Employment Land assessment</p> <p><u>Option 3C:</u> Make no further changes to Map 18 and the Business Employment Land assessment but include a notation to identify Wairākei South as a potential future growth area</p>
<p>Issue 4: Potential Future Business Area – Ōmokoroa/Apata</p>	<p><u>Option 4A:</u> Status quo – Make no provision for further investigation of business land development at Apata and confirm Ōmokoroa as a potential future growth area on Map 18 (Recommended)</p> <p><u>Option 4B:</u> Provide for further investigation of business land development at Apata</p>

<p>Issue 5: Potential Future Business Area – Te Puna</p>	<p><u>Option 5A:</u> Status quo – Do not include Te Puna as a short and medium term growth area for business employment land in the FDS (Recommended)</p> <p><u>Option 5B:</u> Include Te Puna as a short and medium term growth area for business employment land in the FDS</p>
<p>Issue 6: Potential Future Business Area – Te Puke</p>	<p><u>Option 6A:</u> Status quo – Do not provide for new industrial land in the vicinity of Te Puke and leave consenting of the existing Te Puke West zoned land to the appropriate processes (Recommended)</p> <p><u>Option 6B:</u> Provide for new industrial land in the vicinity of Te Puke and support consenting of the existing Te Puke West zoned land</p>

Issue 1: General – Potential future industrial land areas

Option 1A: Retain the draft FDS text and Map 18 locations showing potential long term growth areas for business land (Status Quo).

Advantages

- Approach signals where certainty can be afforded to progress future structure planning and rezoning plan changes for industrial land in the northern and western corridors.
- Based on technical assessments supporting the potential long term growth areas for business land.
- Other submitters may have submitted on the draft FDS if other potential longer-term growth areas for business land were identified in the draft FDS.

Disadvantages

- Does not directly respond to some of the submission points received on the draft FDS.

Financial implications

None identified.

Other considerations

Also refer site specific issues and options 3, 4, 5 and 6 below.

Option 1B: Amend the draft FDS text to better clarify the potential long term growth areas for business land, as follows: (Recommended)

- i. Add a table to page 148 after the existing strategic industrial land allocations table to show the Business Employment Land Growth Allocations for the next 30 years as follows:

“The following table outlines the potential additional business land allocations over the next 30 years and beyond, informed by the HBA and supporting desk-top assessments.

Potential Long-term Growth Area – Business Land	Allocation (hectares)	Delivery timing
Upper Belk Road	150–200	Long-term (2034–2054)
Ōmokoroa	70	Long-term (2034–2054)
Pukemapu*	115	Post-2054
Rangiuru Business Park extension	45	Long-term (2034–2054)
Eastern growth corridor**	Unknown	Post-2054

* Pukemapu is subject to further assessment for urban purposes and feasibility

** Several options will be investigated to identify which, if any, potential growth areas for business land are required in the Eastern growth corridor beyond the 30 year period of the FDS.

ii. Amend the text at page 149 (paragraphs 5, 6 and 7) as follows (text to be deleted shown ~~struckout~~; text to be inserted shown underlined):

~~“In addition to the above planned business land provision, a further 300 to 400 ha of greenfield land is required to support business (industrial) land uses within the sub-region over the next 30 years. Technical investigations have identified the following possible locations for future business land within the current growth corridors:~~

- ~~• Northern Corridor – Ōmokoroa/Apata~~
- ~~• Eastern Corridor – Domain Rd/Tara Road/Bell Road, Te Puke, Rangioru~~
- ~~• Western Corridor – Belk Road /Ōmanawa, Pukemapu~~

~~Some of these areas are also being investigated for potential residential and other land uses, for example the Belk Road plateau area.~~

~~Through more detailed desktop analysis, Ōmokoroa, Belk Road and Pukemapu have emerged as the preferred~~ The SmartGrowth Industrial Land Study has identified potential locations to provide for business land demand needs in the northern and western growth corridors at Ōmokoroa/Apata, Upper Belk Road and Pukemapu .Some of the other potential locations have been identified as having natural hazard, environmental or infrastructure servicing constraints. Potential business land locations in the Eastern growth corridor are not required within the period of the FDS. Possible sites have been identified at Wairākei South, Rangioru, Paengaroa and Te Puke. The locations of potential growth areas for business land are shown on Map 18 and are indicative only. For example, in the Northern growth corridor a potential growth area is identified in the general vicinity of Ōmokoroa and Apata adjacent to State Highway 2 for long-term consideration.”

Advantages

- Provides greater certainty for future decision-makers, authorities, landowners, communities and developers
- Aligns with the residential urban growth table in the FDS in providing for the expected developable yield of business land with the potential growth areas.
- Reflects that feasibility studies and assessment to support a future plan change process for rezoning of land would be required.
- Allows for future consideration of other areas in the Eastern growth corridor.

Disadvantages

- Would result in removal of the possible future locations for strategic business land (short-listed sites).
- May provide less certainty for future decision-makers, authorities, landowners, communities and developers.

Financial implications

None identified. If required, amendments can be made to the FDS text and Map 18 within the existing budget.

Other considerations

- The NPS-UD requires councils to spatially identify broad locations for development, infrastructure required and any constraints on development. In doing so the Future Development Strategy (FDS) is also required to balance the certainty regarding the provision of future urban development with the need to be responsive to demand for such development.
- The FDS forms the basis for integrated, strategic and long-term planning. An FDS helps local authorities set the high-level vision for accommodating urban growth over the long term, and identifies strategic priorities to inform other development-related decisions, such as:
 - district plan zoning and related plan changes
 - priority outcomes in long-term plans and infrastructure strategies, including decisions on funding and financing
 - priorities and decisions in regional land transport plans.

Option 1C: Amend the Map 18 locations text (page 154) showing potential long term growth areas for business land, as follows:

Add additional text to the FDS map alongside the existing text which states: "The Future Development Areas are indicative only". Additional text to state: "The Industrial Land Study has been undertaken using desktop information only, further investigations are required. The locations of potential industrial land as shown on the map are indicative only. For example, in the Northern Corridor there are a range of long listed sites in the Apata and Ōmokoroa area for long-term consideration."

Advantages

- Reflects that the SmartGrowth Industrial Land Study was a desk-top analysis of available information.
- Allows for future consideration of other areas.

Disadvantages

- Undermines the work undertaken to date in identifying the potential future locations for strategic business land.
- Provides less certainty for future decision-makers, authorities, landowners, communities and developers.
- Provides additional confusion as to the potential growth area identified on the map.
- The additional text is unnecessary as the existing text includes the sentence "The future development areas shown are indicative only".

Financial implications

None identified. If required, amendments can be made to the FDS text accompanying Map 18 on page 154 within the existing budget.

Other considerations

The additional wording is in response to one submitter, who considers land at Apata to be a more suitable location for future business land than the location adjacent to the Takitumu Northern Link interchange at Ōmokoroa identified in the SmartGrowth Industrial Land Study and further investigation work. Apata was assessed as part of the study and further investigation work.

Option 1D: Retain the draft FDS text and Map 18 locations showing potential long term growth areas for business land, but include a notation on Map 18 (pages 154) and outline of possible other sites that may be suitable in the text at pages 149 as follows:

“Potential business land locations in the Eastern growth corridor are not required within the period of the FDS. Possible sites have been identified at Wairākei South, Rangiuru, Paengaroa and Te Puke.”

Advantages

- Identifies other potential long-term growth area suitable for business land on Map 18, based on the short-listed areas in the draft FDS and in the SmartGrowth Industrial Land Technical Study report (Aurecon, June 2023)
- Enables the Eastern growth corridor sites to be included.
- Adopts the Future Proof approach in their FDS (2022) for identifying other possible sites for future industrial land in the subregion.

Disadvantages

- May disadvantage landowners and communities by indicating future business land.
- Would show additional longer-term growth areas for business land that are not required to meet the expected demand for business land. Sufficient supply is afforded from existing zoned industrial land, including the Rangiuru Business Park and in Te Puke.
- Would signal possible future urban development of land identified as highly versatile land.

Financial implications

None identified. If required, amendments can be made to the FDS text within the existing budget.

Other considerations

The extent to which other possible sites have sufficient information to carry forward into any formal RMA planning process.

Issue 2: General – Providing for existing industrial activities

Refer also “Te Taiao Environment” issues and options paper

Option 2A: Status quo – Retain current wording of the SmartGrowth Strategy and FDS in relation to existing industrial activities

Advantages

- Existing industrial activities are required to meet the relevant planning and consenting standards, which consider any adverse effects on the environment and the health and wellbeing of people.
- Reflects that the FDS is about planning for future growth and land use change.

Disadvantages

- May not adequately reflect the economic benefits of existing industry to the subregional and New Zealand as a whole.
- The existing draft strategy does not recognise that some emitting industrial activities are having an adverse effect on people and communities.

Financial implications

None identified.

Other considerations

- Resource consenting requirements for industrial activities under the relevant City/District Plan and Regional Natural Resources Plan requirements.
- The Mount Industrial Planning Study which has considered mana whenua, businesses and community issues as to the co-existence or relocation of existing emitting industries and adjoining sensitive land uses within the industrial area. Tauranga City Council is to commence work towards a proposed city-wide commercial and industrial plan change during 2024 which will adopt the relevant specified zones under the National Planning Standards 2019.

Option 2B: Insert additional text to recognise existing industrial activities and their effects, as follows (text to be inserted shown underlined)(Recommended)

- Insert additional wording in Part 1: Introduction and Context - Economic Objectives to recognise and support existing industrial activities that provide for economic and housing growth. “Enable and support the continued establishment, operation and maintenance of existing industrial activities that contribute to the regional and national economy.”
- Amend wording in Part 1: Introduction and Context - Sub-Regional Context- Marine Corridor to recognise industrial activities also require shipping links to and from the Port of Tauranga.
- Amend wording in Part 2: The Growth Challenge - Opportunities to recognise that industrial activities are an economic opportunity for the region.
- Amend wording in Part 3: The Spatial Plan - Chapter 06. Urban Form and Centres introduction to include “construction materials” as a key industry to the nationally significant Port of Tauranga.
- Insert additional wording in Part 3: The Spatial Plan - Chapter 07. Housing - Housing system growth directives that supports existing local industries that provide for construction materials that assist in housing delivery.
- Insert additional wording in the draft FDS at page 148 that recognises the impacts of existing heavy industry as follows: “The SmartGrowth Strategy seeks to reduce the impacts of existing industrial activities on the environment and the health of people living or working in proximity to those activities. Opportunities for the relocation of existing industrial activities to other locations, both within and outside the sub-region, are supported where they will assist in reducing those impacts”.

Advantages

- Recognises that some emitting industrial activities are having an adverse effect on people and communities.

Disadvantages

- May not recognise the existing use rights of businesses operating lawfully within current regulatory requirements.
- Existing industrial activities are required to meet the relevant planning and consenting standards, which consider any adverse effects on the environment and the health and wellbeing of people.

Financial implications

None identified. If required, amendments can be made to the FDS text within the existing budget.

Other considerations

- The NPS-UD requirements for future development strategies.
- The SmartGrowth Industrial Land Study technical report (Aurecon, 2023) identifies the possible areas for future business land within the sub-region that would be technically suitable for heavy industrial uses, however site-specific investigation would be required.
- The National Planning Standards 2019 are required to be given effect to by councils under the Resource Management Act 1991. Tauranga City Council is likely to commence implementing the commercial and industrial zoning from the National Planning Standards through a future plan change in 2024.

Issue 3: Potential Future Business Area – Wairākei South**Option 3A: Status quo – Do not identify Wairākei South as a potential long term growth area for residential and/or business land in the current FDS. (Recommended)**

Defer the consideration of Wairākei South for urban development and in the first instance, to consider catchment management options to manage natural hazard risk and ecology and water quality effects in the wider catchment including the Kaituna River.

Advantages

- Aligns with evidence-based decisions made around the FDS.
- Identifies that a catchment level approach is required to manage flood risk in the Bell Road catchment and the need to consider any development effects across the whole catchment, including both downstream and upstream.
- Maintains the SmartGrowth position that supports a 'Go Carefully' approach to this area.
- Lowers the risk of identifying a potential growth area that may not be able to be developed due to natural hazard, cultural or environmental constraints.
- Under this option consideration of Wairākei South for urban development would be deferred to the next FDS review in three year to enable catchment management options to manage natural hazard risk in the wider catchment and surrounding area to be evaluated.

Disadvantages

- Lost opportunity cost with willing developer and large land parcels in single ownership, near strategic transport corridors and labour supply.
- Relies on the sufficiency of desk top investigations undertaken to date through the SmartGrowth Industrial Land Study.

Financial implications

None identified.

Other considerations

- Under this option further information would be required to demonstrate how flooding, geotechnical and other natural hazard risk would be adequately avoided, remedied or mitigated. A pathway would still exist for the Bell Road Limited Partnership to seek a private plan change.
- The Bell Road LP provided engineering, geotechnical and planning statements at the SmartGrowth hearings. These statements of evidence rely on a number of untested technical and expert conclusions in the face of known flooding, natural hazard risk and geotechnical issues identified by engineering staff at BOPRC, TCC and WBOPDC.
- The Bell Road catchment is currently serviced by a pumping scheme which indicates that flood risk is an existing issue. This suggests the Bell Road catchment is high risk and a precautionary approach should be adopted at this strategic planning step.
- While the location and transport benefits are acknowledged, these would not outweigh the wider issue of providing for urban growth in an overallocated stormwater catchment and resulting costs of resilience if development were to occur in a piece-meal fashion within the catchment.
- Acknowledgement of the Te Maru o Kaituna River Authority and the inconsistency of large-scale and incremental urban land use change in the surrounding and upstream catchments with the vision and objectives of the Kaituna River Document.
- Consideration of the likely requirements arising from the Proposed National Policy Statement for Natural Hazard Decision Making 2023.

Option 3B: Identify Wairākei South as a 'Potential long term growth area – business land' in Map 18 of the FDS and in the Business Employment Land assessment.

Specifically:

- i. Identify Wairākei South as a 'Potential long term growth area – business land' in Map 18 of the FDS and
- ii. Include Wairākei South in the Business Employment Land assessment on page 149 through the following changes:
 - Include 100ha of employment land in the 2027-2034 (medium term) and 45ha of employment land in the 2034-2054 (long term) planning periods.

Advantages

- Provides additional future business land capacity within the Eastern growth corridor.
- Provides certainty for the landowner (Bell Road Limited Partnership) to then seek a private plan change to progress any urban development of Wairākei South through the required rezoning process under the RMA.
- The amount of additional business land required to be identified within the subregion by way of other potential long-term growth areas for business uses would be reduced.

Disadvantages

- There is sufficient zoned business land within the Eastern growth corridor to meet expected demand over the next 30 years.
- While statements of geotechnical and engineering evidence were submitted to the hearing, this technical information does not enable the suitability of the land for urban development to be confirmed and that there will be no impact on the wider catchment.

	<ul style="list-style-type: none"> • The SmartGrowth Industrial Land Study reports identify significant natural hazard issues which would need to be addressed to enable consideration of Wairakei South for urban development. • Identifies land in the Eastern growth corridor ahead of other investigations around Rangiuru (Eastern Town) and Te Puke (Te Puke Spatial Plan). • Urban development at Wairākei South may result in downstream water quality and ecology effects on the Kaituna River and surrounding and lower catchment area which has been the benefit of substantial downstream restoration works.
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Financial implications

None identified.

Other considerations

- The Bell Road Limited Partnership provided further information at the hearings in relation to their submission as statements of evidence from planning, geotechnical and engineering experts. No technical reports were provided.
- While natural hazard risks and protection of the wider catchment would need to be satisfactorily addressed, Wairakei South has not been identified in the FDS as being required to provide residential and business land over the period of the FDS (2024-2054).
- It is recognised that there are constraints and opportunities in delivering the potential business land growth areas to the market.
- Acknowledgement of the Te Maru o Kaituna River Authority and the inconsistency of large-scale and incremental urban land use change in the surrounding and upstream catchments with the vision and objectives of the Kaituna River Document.

Option 3C: Make no further changes to pages 148 and 149 and Map 18 (Page 154) but include a notation to identify Wairākei South as a potential future growth area

<p>Advantages</p> <ul style="list-style-type: none"> • Bell Road is already identified as a possible site in the draft FDS at page 149. • Provides a potential future pathway for urban development. 	<p>Disadvantages</p> <ul style="list-style-type: none"> • Lost opportunity cost. • No sites in the Eastern growth corridor are currently shown in the draft FDS Map 18. • Downstream water quality and ecology effects on the Kaituna River and surrounding and lower catchment area which has been the benefit of substantial downstream restoration works.
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Financial implications

None identified.

Other considerations

- Bell Road is specifically referred to as a potential site at page 149 of the draft FDS along with the other possible sites deemed suitable for industrial land uses. The three yearly review of the SmartGrowth Strategy/FDS required by the NPS-UD allows for changes and any additional potential growth areas to be included in the strategy should these be able to be supported.
- Under this option Wairākei South would be identified in some form in the FDS as subject to technical investigations. FutureProof included three other possible business land sites in their FDS on a separate map as subject to further investigation.
- Acknowledgement of the Te Maru o Kaituna River Authority and the inconsistency of large-scale and incremental urban land use change in the surrounding and upstream catchments with the vision and objectives of the Kaituna River Document.

Issue 4: Potential Future Business Area – Ōmokoroa/Apata

Option 4A: Status quo – Make no provision for further investigation of business land development at Apata and confirm Ōmokoroa as a potential future growth area on Map 18 (Recommended)

Advantages

- Maintains the recommended position put forward in the draft FDS that Apata is not a potential future long-term strategic growth area for business land.
- Locks in Ōmokoroa (adjacent to the proposed Takitumu Northern Link interchange) as a potential future growth area in the FDS.
- Lowers the risk of identifying a potential growth area that may not be able to be developed due to natural hazard, cultural or environmental constraints.

Disadvantages

- SmartGrowth may be seen as insufficiently responsive to development requests in the context of the projected long-term shortfall in business land.
- Relies on the sufficiency of desk top investigations undertaken to date through the SmartGrowth Industrial Land Study.

Financial implications

None identified.

Other considerations

- For the northern growth corridor further industrial land in proximity to the Ōmokoroa urban growth area is considered more appropriate to enable live, work, learn and play to meet the future needs of this population.
- Apata was investigated and is further away from potential labour force, contains highly versatile land and would result in greater transport emissions.
- The Port of Tauranga has no current interest in a freight hub or inland port at Apata.

Option 4B: Provide for further investigation of business land development at Apata	
<p>Advantages</p> <ul style="list-style-type: none"> • Would recognise the Apata rail yards and rail transport connections. 	<p>Disadvantages</p> <ul style="list-style-type: none"> • Desk top investigations of Apata and other sites in the vicinity of Ōmokoroa have been undertaken through the SmartGrowth Industrial land Study. Apata did not score as highly as the Ōmokoroa sites.
Financial implications	
Funding for any further investigations would be required.	
Other considerations	
<ul style="list-style-type: none"> • For the northern growth corridor further industrial land in proximity to the Ōmokoroa urban growth area is considered more appropriate to enable live, work, learn and play to meet the future needs of this population. • Apata was investigated and is further away from the potential labour force of Ōmokoroa, contains highly versatile land and would result in greater transport emissions. • The Port of Tauranga has no current interest in a freight hub or inland port at Apata. 	

Issue 5: Potential Future Business Area – Te Puna	
Option 5A: Status quo - Do not include Te Puna as a short and medium term growth area for business employment land in the FDS (Recommended)	
<p>Advantages</p> <ul style="list-style-type: none"> • Provides certainty for the Te Puna community given recent concerns with industrial land development and zoning at Te Puna Station Road. • Maintains the recommended position put forward in the draft FDS that Te Puna is not a potential future long-term strategic growth area for business land. • Lowers the risk of identifying a potential growth area that may not be able to be developed due to natural hazard, cultural or environmental constraints. 	<p>Disadvantages</p> <ul style="list-style-type: none"> • SmartGrowth may be seen as insufficiently responsive to development requests in the context of the projected long-term shortfall in business land. • Fails to recognise the technical supporting assessments, which identified Te Puna (in the vicinity of SH2/Minden Road) as the highest scoring MCA site in the long-listing phase of the SmartGrowth Industrial Land Study technical report (Aurecon, 2023).
Financial implications	
None identified.	
Other considerations	

For the northern growth corridor further industrial land in proximity to the Ōmokoroa urban growth area is considered more appropriate to enable live, work, learn and play to meet the future needs of this population.

Option 5B: Include Te Puna as a short and medium term growth area for business employment land in the FDS	
<p>Advantages</p> <ul style="list-style-type: none"> Recognises the technical supporting assessments, which identified Te Puna (in the vicinity of SH2/Minden Road) as the highest scoring MCA site in the long-listing phase of the SmartGrowth Industrial Land Study technical report (Aurecon, 2023). Strategic location with Takitimu Northern Link. 	<p>Disadvantages</p> <ul style="list-style-type: none"> The Te Puna community has not been engaged with on whether Te Puna should be a potential future long-term strategic growth area for business land. Wastewater servicing of a new growth area at Te Puna would need to be provided.
Financial implications	
None identified.	
Other considerations	
<ul style="list-style-type: none"> While desktop analysis supports the potential suitability of Te Puna as a future long-term strategic growth area for business land, it is considered there are better sites within the northern growth corridor that support the growth and development at Ōmokoroa. A process to develop a community led spatial plan for Te Puna is likely to commence in the next two years, which will consider the issues facing Te Puna and what actions may be required. This will canvass whether further urban development is enabled or restricted. 	

Issue 6: Potential Future Business Area – Te Puke	
Option 6A: Status quo - Do not provide for new industrial land in the vicinity of Te Puke and leave consenting of the existing Te Puke West zoned land to the appropriate processes (Recommended)	
<p>Advantages</p> <ul style="list-style-type: none"> Maintains the recommended position put forward in the draft FDS that Te Puke is not currently a potential future long-term strategic growth area for additional business land. Lowers the risk of identifying a potential growth area that may not be able to be developed due to natural hazard, cultural or environmental constraints. 	<p>Disadvantages</p> <ul style="list-style-type: none"> May result in lost business opportunities for Te Puke. SmartGrowth may be seen as insufficiently responsive to development requests in the context of the projected long-term shortfall in business land.
Financial implications	
None identified.	

Other considerations

- The development potential for Te Puke West has been there for some time and was zoned through a private plan change. Whether the current industrial zoning is appropriate should be a matter for the Te Puke Spatial Plan to consider and engage with landowners, stakeholders and the community on options.

Option 6B: Provide for new industrial land in the vicinity of Te Puke and support consenting of the existing Te Puke West zoned land**Advantages**

- Provides further business land capacity at Te Puke.

Disadvantages

- Identifies land in the eastern growth corridor ahead of other investigations around Rangiora (Eastern Town) and Te Puke (Te Puke Spatial Plan).
- The SmartGrowth Strategy and FDS is not able to circumvent the resource consenting requirements under the RMA to provide for the development of existing zoned industrial land.

Financial implications

None identified.

Other considerations

- The Te Puke West zoned industrial land has significant geotechnical and stormwater issues to be addressed in obtaining the necessary resource consents. Existing processes under the RMA and Western Bay of Plenty District Plan provide for the development of Te Puke West if those issues are able to be satisfactorily addressed.
- Plan Change 94 (Washer Road industrial area) was made operative by WBOPDC in December 2022 and provides additional industrial zoned land at Te Puke.
- The Te Puke Spatial Plan is being undertaken by WBOPDC with the community, tangata whenua and stakeholders, including Te Puke Economic Development Group. This process is expected to be completed towards the end of 2024 and may identify the need for additional business land to service local demand.

Recommended Decisions

Issue 1: General - Potential future industrial land areas

Option 1B: Amend the draft FDS text to better clarify the potential long term growth areas for business land, as follows:

- i. Add a table to page 148 after the existing strategic industrial land allocations table to show the Business Employment Land Growth Allocations for the next 30 years as follows:

"The following table outlines the potential additional business land allocations over the next 30 years and beyond, informed by the HBA and supporting desk-top assessments.

Potential Long-term Growth Area – Business Land	Allocation (hectares)	Delivery timing
Upper Belk Road	150-200	Long-term (2034-2054)
Ōmokoroa	70	Long-term (2034-2054)
Pukemapu*	115	Post-2054
Rangiuru Business Park extension	45	Long-term (2034-2054)
Eastern growth corridor**	Unknown	Post-2054

* Pukemapu is subject to further assessment for urban purposes and feasibility

** Several options will be investigated to identify which, if any, potential growth areas for business land are required in the Eastern growth corridor beyond the 30 year period of the FDS.

- ii. Amend the text at page 149 (paragraphs 5, 6 and 7) as follows (text to be deleted shown ~~struck out~~; text to be inserted shown underlined):

~~"In addition to the above planned business land provision, a further 300 to 400 ha of greenfield land is required to support business (industrial) land uses within the sub-region over the next 30 years. Technical investigations have identified the following possible locations for future business land within the current growth corridors:~~

- ~~• Northern Corridor – Ōmokoroa/Apata~~
- ~~• Eastern Corridor – Domain Rd/Tara Road/Bell Road, Te Puke, Rangiuru~~
- ~~• Western Corridor – Belk Road /Ōmanawa, Pukemapu~~

~~Some of these areas are also being investigated for potential residential and other land uses, for example the Belk Road plateau area.~~

~~Through more detailed desktop analysis, Ōmokoroa, Belk Road and Pukemapu have emerged as the preferred~~ The SmartGrowth Industrial Land Study has identified potential locations to provide for business land demand

needs in the northern and western growth corridors at Ōmokoroa/Apata, Upper Belk Road and Pukemapu. ~~Some of the other potential locations have been identified as having natural hazard, environmental or infrastructure servicing constraints.~~ Potential business land locations in the Eastern growth corridor are not required within the period of the FDS. Possible sites have been identified at Wairākei South, Rangiuuru, Paengaroa and Te Puke.

The locations of potential growth areas for business land are shown on Map 18 and are indicative only. For example, in the Northern growth corridor a potential growth area is identified in the general vicinity of Ōmokoroa and Apata adjacent to State Highway 2 for long-term consideration.

Issue 2: General – Providing for existing industrial activities

Option 2B: Insert additional text to recognise existing industrial activities and their effects, as follows (text to be inserted shown underlined):

- i. Insert additional wording in Part 1: Introduction and Context – Economic Objectives to recognise and support existing industrial activities that provide for economic and housing growth. “Enable and support the continued establishment, operation and maintenance of existing industrial activities that contribute to the regional and national economy.”
- ii. Amend wording in Part 1: Introduction and Context – Sub-Regional Context- Marine Corridor to recognise industrial activities also require shipping links to and from the Port of Tauranga.
- iii. Amend wording in Part 2: The Growth Challenge – Opportunities to recognise that industrial activities are an economic opportunity for the region.
- iv. Amend wording in Part 3: The Spatial Plan – Chapter 06. Urban Form and Centres introduction to include “construction materials” as a key industry to the nationally significant Port of Tauranga.
- v. Insert additional wording in Part 3: The Spatial Plan – Chapter 07. Housing – Housing system growth directives that supports existing local industries that provide for construction materials that assist in housing delivery.
- vi. Insert additional wording in the draft FDS at page 148 that recognises the impacts of existing heavy industry as follows:
“The SmartGrowth Strategy seeks to reduce the impacts of existing industrial activities on the environment and the health of people living or working in proximity to those activities. Opportunities for the relocation of existing industrial activities to other locations, both within and outside the sub-region, are supported where they will assist in reducing those impacts”.

Issue 3: New Potential Growth Area – Wairākei South

Option 3A: Status quo – Do not identify Wairākei South as a potential long term growth area for residential and/or business land in the current FDS.

Issue 4: New Potential Future Business Area – Ōmokoroa/Apata

Option 4A: Status quo – Make no provision for further investigation of business land development at Apata and confirm Ōmokoroa as a potential future growth area on Map 18.

Issue 5: New Potential Future Business Area – Te Puna

Option 5A: Status quo – Do not include Te Puna as a short and medium term growth area for business employment land in the FDS.

Issue 6: New Potential Future Business Area – Te Puke

Option 6A: Status quo – Do not provide for new industrial land in the vicinity of Te Puke and leave consenting of the existing Te Puke West zoned land to the appropriate processes.

Recommended Reasons

The Housing and Business Capacity Assessment (HBA) business land assessment by Market Economics determined business land requirements and expected shortfall in the longer-term (10–30 year period from 2034–2054). The HBA assessment considered existing and planned business land within the Eastern growth corridor will be sufficient to meet the expected market demand for business land over the next 30 years.

The Te Puke Spatial Plan is to be progressed by Western Bay of Plenty District Council over the next 12 months and will identify if any additional local business land is required to support this community and expected growth. The current Te Puke West zoned industrial land is proposed to be reconsidered through this spatial plan process, given the difficulties in addressing stormwater, access and other issues over the area.

Similarly, while no potential sub-regional growth area for business land is identified or required at Te Puna, future work on a Te Puna Spatial Plan may identify the need for local business land, which can be considered again at the next review of the FDS in three years' time.

It is intended as part of the SmartGrowth Implementation and Funding Plan for a whole of catchment investigation of possible future urban development scenarios within the Bell Road/Kaituna River catchment, including Wairākei South, Te Puke, Paengaroa and Te Kāinga. There is insufficient information currently to enable the requested Wairākei South growth area to be identified as a potential longer term growth area for business in Map 18 and the FDS tables at pages 148–149 of the strategy. The suitability of this area for urban development remains questionable given natural hazard risks, including flooding within the wider catchment and future climate change impacts. A whole of catchment approach to the consideration of possible future urban development scenarios within the Bell Road/Kaituna River catchment is required.

The location of potential long-term growth areas for business land in the Northern growth corridor is confirmed in the vicinity of Ōmokoroa from desk top analysis and technical information available to date. The strategic location adjoining the Ōmokoroa urban growth areas and future Takitumu Northern Link Stage 2 interchange support the identification of this area on Map 18 of the strategy. However, that does not preclude a more suitable area in the wider Ōmokoroa/Apata area through future feasibility assessment ahead of structure planning and rezoning.

Upper Belk Road is confirmed as a potential long term growth area for business land to assist in addressing the business land shortfall in the Western growth corridor and this is supported by current demand and uptake in the Tauriko Business Estate and its planned extension into Stage 4. An allocation of 150-200ha of developable land for business use (industrial employment) has been allowed for in the FDS, within a wider growth area that would provide for residential housing, open space and other land uses in future. Upper Belk Road planning is expected to occur in conjunction with a Government led Specified Development Projects process under the Urban Developments Act 2000.

It is accepted that current heavy industry has a place in the western Bay of Plenty subregion, while also acknowledging that some emitting industry can have adverse effects on the wellbeing of people and communities. Additions to the strategy are recommended in response to submissions received concerned about the importance of industry not being highlighted, as well as those concerned about air quality and other impacts. The SmartGrowth partnership supports efforts to address land use conflicts that currently exist and to ensure that future planning for greenfield areas avoids creating adverse impacts on any adjoining sensitive land uses.

The SmartGrowth Implementation and Funding Plan is to also consider as an action taking a subregional approach to applying the National Planning Standards 2019 for business land (in response to the submissions from Clear the Air and the Urban Taskforce). Initial work has been undertaken by officers from Western Bay of Plenty District Council and Tauranga City Council on applying the planning standards to centres and business land across the subregion.

Date approved:

Approved by:

SmartGrowth Strategy 2023–2073

ISSUES AND OPTIONS PAPER

Housing

Author: Simone Cuers

Topic	Chapter 7. Housing
Issues	<ol style="list-style-type: none">1. Incorporate sustainability standards in new homes2. Use inclusionary zoning to achieve housing outcomes3. Intensification in existing urban areas4. Role of local government5. Māori housing6. Social / community housing7. Strengthen focus on housing outcomes in the Strategy8. Develop monitoring and reporting framework for SmartGrowth sub regional Housing Systems Plan

Staff Narrative

Overview of feedback received

A total of 25 submissions were received regarding *Chapter 7. Housing*, which incorporated many submission points. One submitter raised additional issues relating to Housing at the Hearings on 4 and 5 December 2023. These two issues are described and discussed in section 7. *Strengthen focus on housing outcomes in the Strategy*.

Analysis of submitters' response to Housing questions '*We want you to feel confident that we have a plan in place to manage growth. Do you think we are focusing on the right things?*' showed:

- Five submissions supported the Housing approach in the strategy
- Six submissions opposed the Housing approach in the Strategy

Three simply responded 'yes' to the above Housing question (Callum Van de Weyer, Nathan Wansbrough, Ruth Underwood). Nga Potiki a Tamapahore Trust agreed to adopting the housing issues listed in the Strategy and housing system growth directives. Julie Andrews endorsed the 'paradigm shift' and 'using all the tools available' to ensure future development provides the range of housing options the community needs.

One submission replied simply 'no' in response to the Housing questions (John Robson). Another replied 'no' adding that housing development should stop going out, start going up (Lee Jared). Conversely another submitter spoke against intensification of housing in the Bay. Six submitters indicated the Strategy does not go far enough to address housing gaps. One submitter indicated housing issues should be left to central government, council should concentrate on council core priorities (Wendy Wilson-Jenks).

The five submissions which provided detail on how they oppose the Housing approach have been allocated to relevant sections of this Report as outlined below, to respond appropriately to issues raised.

Submission	Section of Report
The Strategy offers no path towards any real prospect of an increase in public housing supply or tenure law reform that might lead to the stated aspiration of increasing affordable housing, (Beth Bowden).	Strengthen focus on housing outcomes in the Strategy
Housing is a human rights issue, (Carole Gordon), we have a housing crisis, this region has failed in provision of homes for an ageing population and the Strategy does not address this.	Strengthen focus on housing outcomes in the Strategy
Housing development should stop going out, start going up, (Lee Jared).	Intensification in existing urban areas
Opposes intensification of housing in the Bay; that infill causes stress from closer living, creates ugly boxes, and that we have enough land in New Zealand to not have to intensify, (David Lucas).	Intensification in existing urban areas
Housing issues should be left to central government, council should concentrate on council core priorities, (Wendy Wilson-Jenks).	Role of local government

Submissions have been categorised into the following themes:

1. Incorporate sustainability standards in new homes
2. Use inclusionary zoning to achieve housing outcomes
3. Intensification in existing urban areas
4. Role of local government
5. Māori housing
6. Social / community housing
7. Strengthen the focus on housing outcomes in the Strategy
8. Develop monitoring and reporting framework for SmartGrowth sub regional Housing Systems Plan

1. Incorporate sustainability and accessibility standards in new homes

Two submissions were received both of which proposed new homes should be built to higher sustainability standards including; accessibility, rainwater harvesting and solar panels for hot water heating and electricity supply, (Heather Smith – Kerr and Ruth Underwood). The proposed sustainability standards are consistent with these SmartGrowth 2023's Environmental and Social Objectives:

- *Encourage sustainable development and adaptive planning*
- *Respond and adapt to climate change through building resilience, support the transition to lower carbon and improving biodiversity.*
- *Enable and shape an inclusive, safe, sustainable, efficient, and more vibrant urban form.*
- *Enable and support sufficient housing supply in existing and new urban areas to meet current and future needs, this includes a range of housing types, tenures, and price points.*

Discussion

These submissions speak to the topic of housing being fit for purpose for inhabitants across their lifespan. Housing which is accessible provides more housing choice for people with disabilities and enables people to age in place; and housing fitted with devices which produce energy, (e.g., solar panels) or harvest rainwater can provide a home with lower operating costs. The November 2023 credit report from Centrix shows reductions in home operating costs would be welcome as the number of households

struggling financially rise; “arrears continue to climb for mortgages, personal and vehicle loans, and credit cards. In fact, mortgage arrears are up 25% year-on-year, which could be a concern as households across the country continue to roll off fixed rates and into new, higher interest rates”. <https://www.centrix.co.nz/credit-indicator/>

Understanding recent, and ongoing, changes to the Building Code and Residential Tenancies Regulations, and benefit and costs of achieving new standards are a key consideration. A recent example is November 2021 MBIE (Ministry of Business, Innovation and Employment) announcement on increases to roof, window, wall, and underfloor insulation requirements. The benefits are clear, as these aim to reduce energy needed for heating residential homes by approximately 40%, and aim to deliver warmer, drier, and healthier homes that are significantly cheaper to heat while also generating carbon savings through energy efficiency. There is however a significant increase in construction costs because of the changes, which is passed on to buyers and contributes to an overall increase in the ‘upfront’ cost of housing.

The Residential Tenancies (Healthy Homes Standards) Regulations 2019 commenced on 1 July 2019, with the aim of addressing issues with cold, damp, drainage, and draughts in rental properties. The regulations include minimum standards for: heating, insulation, ventilation, moisture ingress (dampness) and drainage and draught stopping. Kāinga Ora – Homes and Communities, and registered Community Housing Provider houses must comply with the healthy homes standards by 1 July 2024. All rental homes must comply with the healthy homes standards by 1 July 2025.

Directing sustainability and accessibility standards in new homes is outside SmartGrowth’s remit. Opportunities to achieve these standards may be addressed in future changes to government regulations, for example accessibility standards via Building Code changes.

Option for consideration

Recommend note the submissions and make no changes to the Strategy.

2. Use inclusionary zoning to achieve housing outcomes

The use of inclusionary zoning to achieve housing outcomes was proposed by four submitters as follows:

- a. it is a key part of the Housing Strategy, (Pauline Bennett)
- b. it is key to the SmartGrowth Strategy, (Sustainable BOP)
- c. inclusionary zoning, or even more prescriptive planning controls, needed to manage the impact of competing land uses, (Beth Bowden)
- d. co-ordinate advocacy with other local authorities to central government on legal mechanisms for inclusionary zoning, (Christine Ralph)

Discussion

Inclusionary zoning as a planning control for achieving specific housing outcomes in conjunction with developers is a much-discussed option and can contribute to addressing housing gaps, however the policy and legislative setting has not been set by central government. To date inclusionary zoning has only been implemented in New Zealand via voluntary agreement with developers in Queenstown Lakes. QLDC has

utilized inclusionary zoning since 2003 to capture a portion of the value created when land is up zoned. Funding and land captured has been utilised by their community housing trust to deliver social housing, affordable housing to rent and purchase, including retained affordable product. QLDC took this approach as Queenstown-Lake's house prices are much more expensive than the New Zealand average and have been persistently high in the district relative to local incomes. QL's house price to income ratio in 2023 it was 15.50, Tauranga's was 8.51.

This year *Waikato Housing Initiative's* councils, (e.g. Hamilton, Waikato South, Waipa), have commenced work on implementing inclusionary zoning in their councils, also in response to lack of affordable housing.

Option for consideration

Recommended decision is note the submissions and make no changes to the Strategy.

It is suggested SmartGrowth advocate to central government for clear direction on inclusionary zoning.

Smartgrowth, via the Housing Action Group, will maintain a watching brief on Waikato Housing Initiative's inclusionary zoning work in their district, (e.g., Hamilton, Waikato South, Waipa).

3. Intensification in existing urban areas

Ten submissions were received:

- Five supported intensification
- One sought clarification on density numbers and costs of infrastructure in intensification versus greenfield costs
- Two submissions gave qualified support for intensification.
- One submission spoke to need to mitigate against adverse impacts from intensification
- One opposed intensification

Support for intensification:

- Housing development should stop going out, start going up, (Lee Jared).
- In favour of intensification over sprawl because of carbon reduction and environmental factors. (Julie Andrews)
- Consider limiting the scope of greenfield land development and give immediate priority focus to planned quality intensification of Te Papa and other brownfield existing areas, (Carole Gordon).
- Three to eight storey single floor apartments developed within current urban areas are a priority as they could provide security of tenure even if privately owned, along with priority for Elder Social Houses and rent to own for all other groups. Because lifts are required, there is no discrimination against Elders and persons with disabilities. (Pauline Bennett).
- Housing for larger families, (including multi-generational households), can also form part of intensification strategies. Those in poverty should not be

marginalised to the sidelines, we must ensure they are integrated with society and are supported responsibly. This creates truly diverse communities, (CPAG).

Queries about intensification:

— Will intensification mostly be 2-3 story townhouses, or 4-6-8 story apartments? The dots on the map seem to indicate 4-8 stories, but is that realistic? (Sustainable BOP Trust).

— It is also unclear whether the proposed TCC Plan Change 33 has been assumed as part of the Strategy or, if not, what its impact would be if it were to go through, (Beth Bowden). The proposed TCC Plan Change 33 is part of the Strategy.

•

Two submitters provide qualified support for intensification:

- More community discussion is needed on the nature of intensification itself and how 15-minute neighbourhoods can be delivered, (Beth Bowden).
- The negative impacts of intensification, in particular overshadowing and privacy need to be effectively mitigated, (Ruth Underwood).

One submitter spoke against intensification of housing in the Bay; that infill causes stress from closer living, creates ugly boxes, and that we have enough land in New Zealand to not have to intensify, (David Lucas).

Discussion

Intensification is a key policy in central government's *National Policy Statement on Housing and Urban Development*, (NPS – HUD) which sets out the role of local government. Both TCC and WBOPDC are defined as Tier 1 urban environments in NPS-HUD, and as such are required to plan for intensification. Thus, the intensification approach, or whether to go 'up or out', is part of central government policy and subsequently in the SmartGrowth Strategy, which tries to provide the right balance.

Option for consideration

Recommended decision is to note the submissions and make no changes to the Strategy.

As the balance between greenfields and intensification is a key platform of the SmartGrowth Strategy's connected centres programme, no changes are proposed. This issue is also addressed in the IOP for Urban Form and Centres.

4. Role of local government

Three submitters spoke to the role of local government in the housing space – two argued councils have a significant role to play in addressing housing needs across the region. Scott Nicholson and Christine Ralph stated there should be a greater emphasis on the role of councils in addressing housing stress and needs across the region, that councils have a key role in leading the creation and implementation of both local and subregional housing strategies, the latter via active participation in the Housing Action

Plan Group. Ensuring councils have dedicated staff skilled in housing development to undertake facilitation and advocacy roles was also proposed.

One submitter indicated housing issues should be left to central government, council should concentrate on council core priorities, (Wendy Wilson-Jenks).

Discussion

Local governments' role in housing is not discretionary, the role is set out in central government legislation and policy. The purpose of local government as listed in the Local Government Act 2022 is to promote the social, economic, environmental, and cultural well-being of communities in the present and for the future. Councils principally support the provision of housing through their planning and consenting functions, and through provision of services and infrastructure. The National Policy Statement on Housing and Urban Development, (NPS – HUD) specifies how local governments are to deliver on housing policy. Both TCC and WBOPDC are defined as Tier 1 urban environments in NPS-HUD, and as such are required to deliver on a range of policies regarding housing.

Option for consideration

Recommended decision is to note the submissions and make no changes to the Strategy.

There is value in strengthening integration and partnering between all players in the local housing system (councils, central government, private market housing developers and builders, community housing providers, and social service providers) around their respective roles in housing planning and provision. This will be led by the Housing Action Working Group, as part of implementation; driving, and delivering on the sub regional Housing Systems Plan.

5. Māori housing

Four submissions were received speaking to considerations of population growth, barriers to developing housing for Māori along with suggested solutions.

Submissions from the tāngata whenua collective (CTWF workshop) and Ngai Tukairangi Trust asked how can we manage growth and provide houses for others, when we can't currently and adequately provide homes for our own? Where is the manaakitanga and kotahitanga? Our current population requires priority over future population. We need to ensure that manuhiri are not prioritised over mana whenua. Māori are already overrepresented in the worst statistics relating to employment, income, housing, and homelessness. The SmartGrowth Strategy needs to ensure that Māori are not left further behind. Increasing the supply of housing/rentals is good but needs to cater for the range of needs, especially lower income. We need affordable rentals and homes in urban areas as well as the ability to build on our whenua. In relation to Māori land development, (tāngata whenua collective submission), indicated infrastructure costs are so large, just as huge a cost as paying for a house.

Nga Potiki a Tamapahore Trust agree with and support the challenge of enabling Tangata Whenua to realise values and aspiration for their whenua and indicate

development of Māori land is also hampered by zoning rules and other regulations that do not reflect the needs or aspirations of Māori. However, the focus of the cultural well-being on papakainga development on Māori land only is myopic and does not address other important issues.

Submitters proposed the following:

- Māori land be free from rates and reduce water charges, (tāngata whenua collective submission)
- Streamline resource consenting to fast-track housing build, (tāngata whenua collective submission and Ngai Tukairangi Trust).
- Establish Māori bank to source reasonable price finance, (tāngata whenua collective submission)
- There is space for more housing in Maketu, only Tāngata Whenua should build there, (Tania Pirere).

Discussion

These are key points. An in-depth analysis of how District Plans are enabling housing for Māori on whenua Māori and in urban areas is required to ensure consenting and other council processes support efficient housing development. A new Housing System Growth Directive is recommended below, and the in-depth analysis can form part of the Implementation Plan of the Strategy, via the Housing System's Plan..

Option for consideration

Recommended decision is add new Housing System Growth Directive *."8. District Plans, policies, toolkits, and funding programs enable housing for Māori on whenua Māori and barriers to delivery are actively addressed."*

6. Social / community housing

Four submissions were received all of which support social housing provision and increases in the subregion.

- Social housing supply should be increased in the subregion - Child Poverty Action Group (CPAG) has suggested nationally we need to increase the number of State-Owned Units from 3.2% to 4% by 2030 and 5% by 2040. The current Social Housing base in WBOP being less than 2% is not good enough and should be addressed.
- Central government funding for social housing should be prioritised to Community Housing Providers, not via central government provision, (Pauline Bennett)
- Ensure elderly, disabled and most vulnerable residents' housing needs are met, (Sustainable BOP)
- Suggested additions, (Christine Ralph), to the Housing Directives and Implementation Plan including the following:
 1. Support and collaborate with central government through project grant schemes, state housing provision, fiscal support for Community Housing projects, partnering in exemplar affordable housing projects.

2. Continue to support the homeless sector initiatives.
 - Another submitter spoke to addressing this; Julie Andrews stated as homelessness increases and options to relocate decrease, we need initiatives - Auckland's city mission seems a great initiative.
3. Continued council subsidisation of development/financial contributions.

Discussion

The draft housing chapter and growth directives include a directive for increasing public housing supply, however a clearer expression of roles in public housing provision will add value to the Strategy. Option for consideration

Recommended decision is change growth directive 6. From *"Public housing supply is increased and aligns the typologies of new and existing housing stock to match the needs of the community."*

To *"6. Central government leads increase in public housing supply and aligns the typologies of new and existing housing stock to match the needs of the community."*

7. Strengthen the focus on housing outcomes in the Strategy.

Six submissions spoke to the Housing Chapter not providing solutions:

1. The Housing Chapter summarised some of the challenges in the housing sector but has not identified solutions. It has been well documented over time that housing problems in the WBOP are very serious and have proven very difficult to solve, both for the short term and long term, (CPAG).
2. The Strategy offers no path towards any real prospect of an increase in public housing supply or tenure law reform that might lead to the stated aspiration of increasing affordable housing, (Beth Bowden).
3. How will this Strategy realistically result in affordable housing? (Sustainable BOP Trust)
4. How much affordable housing is anticipated and how is "affordable" defined? (Sustainable BOP Trust)
5. Housing is a human rights issue, (Carole Gordon), we have a housing crisis, this region has failed in provision of homes for an ageing population and the Strategy does not address this.

The older age group of over 65 years is going to be a considerable proportion of the population, nearly one in three in Tauranga by 2030. However, there is limited information in the Strategy on specific ideas considering and planning for this impending wave, (SocialLink). The submissions raise key points with regards to how the housing system will respond to the sub-region's changing demographics, in particular its ageing population and increasing ethnic diversity. These are summarised below.

Older people

The subregion has a growing older population along with an increasing proportion of older people retiring without owning their home, requiring planning and delivery of housing options for the different life phases for older people:

- Older people with limited financial means require secure affordable rental accommodation

- Small houses/units with single or two bedrooms for rental or purchase, (standalone, duplex, terraced, apartment options), as more older people seek to downsize.
- Alternative tenure options such as Abbeyfield - group of residents live independently in one house with some share spaces.
- Multi-generational options for extended families
- Retirement villages provided by private developers or community trust partnerships
- 'Rest home' facilities to provide care and support for people who are unable to remain living by themselves.
- Hospital level care and dementia care facilities.

Papakāinga housing for kaumatua Two submitters spoke to ways sale proceeds from TCC's Elder housing could be used to support elder housing options, one suggesting the sales proceeds that will come from sale of the Pitau Road Village in Mount Maunganui could be used for elder housing straight away, (Julie Andrews).

Seasonal worker accommodation

Julie Andrews noted the demand for seasonal worker accommodation in the Eastern Corridor and the ability of communities like Te Puke, Pongakawa, Paengaroa and Maketu rather than Tauriko to accommodate workers as they already have essential services, they have their own community identity and existing social infrastructure and networks. New Zealand Kiwifruit Growers indicated whilst the SmartGrowth strategy alludes to the importance of securing accommodation for seasonal workers near their job locations and essential services, specifics on how this will be realised are lacking. NZKGI is ready to actively participate in discussions.

Suggestions on what is needed to address housing gaps in general:

- Affordable rental housing
 - focus on longer term solutions such as social housing, incentives to build new affordable housing.
 - assisted rental
 - retained affordable to rent
- joint venture affordable housing developments
- retained affordable to purchase
- Increase home ownership - shared home ownership, rent to buy schemes, (e.g. facilitate access to central government funded programs)
- accessible homes for people with disabilities,
- provision of multi-generational households
- more options for single person households
- championing the needs of those most susceptible to housing stress and homelessness in the region, collaborate to end homelessness with a housing first approach
- Enable minor dwellings - rural landowners should be allowed to build an extra dwelling on their lots without resource consent, (Paul Hickson)

Suggestions provided in submission on 'the how' – ways to achieve housing outcomes:

- Central government plays a crucial role in addressing homelessness with their offerings like emergency housing, transitional arrangements, and social housing. Priority should be given to collaborating with local entities, including councils and iwi, and adopting a community-centric approach to significantly alleviate housing challenges, (Scott Nicholson).
- The SmartGrowth Housing Action Plan Working Group should contain at least 50 % membership of people who are working in the housing development sector and can facilitate collaboration and advocacy for housing projects, (Christine Ralph).
- Provide regulatory support through RMA Plans for development incentives for permanent affordable housing throughout the community
- Government must lead development, incentives can lead to development in the right way and the right place (within the current urban areas), (Pauline Bennett).
- provide a breakdown of the target housing supply by location that must be met for rental and ownership by household size and price point.
- Develop Evidence-based Housing Plans: action plans grounded in solid data.
- Co-ordinated advocacy with other local authorities to the banking industry for less constrained lending for housing developments
- Co-ordinated advocacy with other local authorities to central government on the cost and supply streams for building products and a skilled construction workforce
- Purpose-built long-term rental accommodation is common in Europe and that there is interest in Europe in investing in this kind of accommodation in NZ, (Julie Andrews).

David Lucas spoke to addressing housing needs for all ethnic groups - There is a lot of emphasis on housing for Māori, that we live in a multi-cultural society with all ethnicities who live here deserving a home to live in.

Christine Ralph requested it is noted in the Strategy document that the adopted SmartGrowth Housing Action Plan 2020 actions have been incorporated into the subregional Housing Systems Plan. This submitter raised two additional issues relating to Housing at the Hearings on 4 and 5 December 2023:

1. Why the sub regional housing systems plan is waiting for the SmartGrowth Strategy rather than being an input.
2. Seeking an update on where the sub regional housing systems plan is at and is it the vehicle to pick up and address the issues raised, including demographic change and aging population.

Discussion

The breadth of content from submitters reported in this section demonstrates the complexity of the housing system and the community's concern for, and passion about, the core human need and right that is housing. The submission themes are discussed below.

Options overview	
Issue 1. Incorporate sustainability and accessibility standards in new homes	
Option 1A	Note the submissions and make no changes.
Issue 2. Use inclusionary zoning to achieve housing outcomes	
Option 2A	Note the submissions and make no changes to the Strategy. Work with our central government partners and advocate to central government for clear direction on inclusionary zoning. Maintain a watching brief on Waikato Housing Initiative's inclusionary zoning work in their councils, (E.g. Hamilton, Waikato South, Waipa).
Issue 3. Intensification in existing urban areas	
Option 3A	Note the submissions and make no changes to the Strategy. No changes are proposed, as the balance between greenfields and intensification is a key platform of the SmartGrowth Strategy's connected centres programme.
Issue 4. Role of local government	
Option 4A	Note the submissions and make no changes to the Strategy. Strengthen integration and partnering between all players in the housing system (councils, central government, private market housing developers and builders, community housing providers, and social service providers) around their respective roles in housing planning and provision. This will be led by the Housing Action Working Group, as part of implementation, driving, and delivering on the sub regional Housing Systems Plan.
Issue 5. Māori housing	
Option 5A	Propose a new Housing System Growth Directive 8. <i>"District Plans, policies, toolkits and funding programs enable housing for Māori on whenua Māori and barriers to delivery are actively addressed."</i>
Option 5B	Note the submissions and make no changes.
Issue 6. Social / community housing	
Option 6A	Recommend change Growth Directive 6. From "Public housing supply is increased and aligns the typologies of new and existing housing stock to match the needs of the community."

Option 6B	<p>To "6. Central government leads increase in public housing supply and aligns the typologies of new and existing housing stock to match the needs of the community."</p> <p>Note the submissions and make no changes.</p>
Issue 7. Strengthen the focus on housing outcomes in the Strategy.	
Option 7A	<p>Update the housing systems challenges in the Strategy to note the changing ethnic diversity requiring different housing market responses (e.g. for more intergenerational living). The following text is recommended to be added to page 112 under 'Key housing system challenges', as a new housing challenge. It is best positioned between the 9th Challenge and 10th Challenge: <i>"Changing ethnic diversity in the sub region requires different housing market responses, (e.g., for multigenerational living).</i></p> <p>Amend the existing Housing system growth directive 2. From <i>"2. Deliver the place-based housing plan through collaboration and leadership,"</i> to <i>"2. Deliver the place-based housing plan through collaboration and leadership, including use of local impact investment, such as BOP Housing Equity Fund and via Quayside Holdings Ltd for example, to support delivery of social, affordable to rent and buy housing and housing on whenua Māori.</i></p> <p>Add a new Housing System Growth Directive 9 <i>"Ensure place-based housing plans clearly respond to the needs of an older and more ethnically diverse population."</i></p> <p>Add to the Strategy's Housing Chapter; the Smartgrowth Housing Action Plan 2020 has been incorporated into the Draft sub regional Housing Systems Plan. The following text in italics is recommended, to go into Draft Strategy in housing chapter, at the end of this existing paragraph on p.111:</p> <p>The SmartGrowth Partners have developed a Sub-Regional Housing Systems Plan which brings together the key housing information for the western Bay of Plenty sub-region, identifies gaps, and lays out a clear Action Plan to improve the housing system in the sub-region, now and into the future. <i>The Sub-Regional Housing Systems Plan builds on the previous SmartGrowth Housing Action Plan 2020 and incorporates strategy that will lead to deliverable actions.</i></p>
Option 7B	Note the submissions and make no changes to the Strategy.
Issue 8.	
Option 8A	<p>Note the submissions and make no changes to the Strategy.</p> <p>Note the submission on developing a monitoring framework which tracks housing outcomes across the sub region. Refer the development of a monitoring and reporting framework for the sub regional housing systems plan to the Housing Action Group.</p>

Issue 1. Incorporate sustainability and accessibility standards in new homes	
Option 1A. Note the submissions and make no changes to the Strategy.	
Advantages <ul style="list-style-type: none"> • • • Avoids creating unrealistic expectations that SmartGrowth can direct these standards in new housing. 	Disadvantages <ul style="list-style-type: none"> • • Does not respond to the issues raised by submitters
Financial implications	
N/A	
Other considerations	
Directing sustainability and accessibility standards in new homes is outside SmartGrowth’s remit. Opportunities to achieve these standards may be addressed in future changes to government regulations, for example accessibility standards via Building Code changes.	

Issue 3. Intensification in existing urban areas	
Option 3A: Note the submissions and make no changes to the Strategy. As the balance between greenfields and intensification is a key platform of the SmartGrowth Strategy’s connected centres programme, no changes are proposed.	
Advantages <ul style="list-style-type: none"> • n/a 	Disadvantages <ul style="list-style-type: none"> • Submitters may consider their issues have not been heard or addressed.
Financial implications	
N/A	
Other considerations	
Central government has set policy direction, e.g., via NPS UD, which Tier 1 Councils are required to progress. This may not be well understood by the general community.	

Issue 4. Role of local government**Option 4A:** Note the submissions and make no changes to the Strategy.

Strengthen integration and partnering between all players in the housing system (councils, central government, private market housing developers and builders, community housing providers, and social service providers) around their respective roles in housing planning and provision. This will be led by the housing action working group, as part of implementation, driving, and delivering on the sub regional housing systems plan.

Advantages

- Allows all stakeholders to work to one agreed plan
- Collaborative initiatives are best practice in addressing complex issues such as housing

Disadvantages

- Collaborative approaches require ongoing resourcing to be successful

Financial implications

N/A

Other considerations n/a**Issue 5. Māori housing****Option 5A:** Develop a new Housing System Growth Directive 8. *District Plans, policies, toolkits, and funding programs enable housing for Māori on whenua Māori and barriers to delivery are addressed.***Advantages**

- Addressing barriers which District Plans, policies, out of date toolkits (e.g. Papakāinga Toolkit), a lack of funding create to stymy Māori housing are key to unlocking Māori housing outcomes

Disadvantages

- Whilst this is a useful approach it does not guarantee improved funding Māori housing; funding for infrastructure provision and housing build.

Financial implications

N/A

Other considerations

-

Option 5B Note the submissions and make no changes

Advantages	Disadvantages
<ul style="list-style-type: none"> - 	<ul style="list-style-type: none"> Does not respond to the issues raised by submitters
Financial implications	
n/a	
Other considerations	
-	

Issue 6. Social / community housing

Option 6A: Change Growth Directive 6. from “Public housing supply is increased and aligns the typologies of new and existing housing stock to match the needs of the community.”
 To: 6. “Central government leads increase in public housing supply and aligns the typologies of new and existing housing stock to match the needs of the community”

Advantages	Disadvantages
<ul style="list-style-type: none"> Provides clarity about roles in public housing provision 	<ul style="list-style-type: none"> n/a
Financial implications	
N/A	
Other considerations	
-	

Option 6B Note the submissions and make no changes

Advantages	Disadvantages
<ul style="list-style-type: none"> - 	<ul style="list-style-type: none"> Does not respond to the issues raised by submitters
Financial implications	
n/a	
Other considerations	

-

Issue 7. Strengthen the focus on housing outcomes in the Strategy.

Option 7A: Update the housing systems challenges in the Housing chapter of the Strategy to note the changing ethnic diversity requiring different housing market responses. . The following text is recommended to be added to page 112 under Key Housing System Challenges as a new Housing Challenge. This is best positioned in between the 9th and 10th challenges. *Changing ethnic diversity in the sub region requires different housing market responses, (e.g., for multigenerational living).*

Add a new Housing system growth directive “9. *Ensure place-based housing plans clearly respond to the needs of an older and more ethnically diverse population.*”

Amend the existing Housing system growth directive 2. From “Deliver the place-based housing plan through collaboration and leadership,” to “Deliver the place-based housing plan through collaboration and leadership, including use of local impact investment, such as BOP Housing Equity Fund and via Quayside Holdings Ltd for example, to support delivery of social, affordable to rent and buy housing and housing on whenua Māori.”

Add to the Strategy’s Housing Chapter; the SmartGrowth Housing Action Plan 2020 has been incorporated in the sub regional Housing Systems Plan. New text to go on p.111 at end of this paragraph as outlined in italics: SmartGrowth Partners have developed a sub-regional housing systems plan, which brings together the key housing information for the western Bay of Plenty sub region, identifies gaps, and lays out a clear action plan to improve the housing system in the sub region, now and into the future. *The sub regional Housing Systems Plan builds on the previous Smart Growth Housing Action Plan 2020 and incorporates strategy that will lead to deliverable actions.*

Advantages

- New growth directive speaking to older people and ethnically diverse groups’ housing needs adds value to the Strategy as it recognises the diversity of housing needs.
- Funding is a significant impediment to housing provision – providing detail on local funding options to pursue is relevant

Disadvantages

- Funding is a significant impediment to housing provision – access to funding is not guaranteed

Financial implications

N/A

Other considerations

-

Option 7B: Note the submissions and make no changes	
Advantages <ul style="list-style-type: none"> n/a 	Disadvantages <ul style="list-style-type: none"> Does not respond to the issues raised by submitters
Financial implications	
Other considerations	
Issue 8. Develop monitoring and reporting framework for SmartGrowth sub regional Housing Systems Plan	
Option 8A: Note the submission and make no changes to the Strategy. Refer the development of a monitoring and reporting framework for the sub regional housing systems plan to the Housing Action Group.	
Advantages <ul style="list-style-type: none"> It is good practice to ensure there is appropriate monitoring of any strategy, along with addressing gaps in implementation of strategy. 	Disadvantages <ul style="list-style-type: none"> Developing this will require resourcing.
Financial implications	
N/A	
Other considerations	

Recommended Decisions
<p>Issue 1. Incorporate sustainability and accessibility standards in new homes</p> <p><u>Option 1A.</u> Note the submissions and make no changes to the Strategy.</p>
<p>Issue 2. Use inclusionary zoning to achieve housing outcomes</p> <p><u>Option 2A.</u> Note the submissions and make no changes to the Strategy.</p>
<p>Issue 3. Intensification in existing urban areas</p> <p><u>Option 3A.</u> Note the submissions and make no changes to the Strategy.</p>
<p>Issue 4. Role of local government</p> <p><u>Option 4A.</u> Note the submissions and make no changes to the Strategy.</p>
<p>Issue 5. Māori housing</p> <p><u>Option 5A.</u> Include a new Housing System Growth Directive 8. <i>"District Plans, policies, toolkits and funding programs enable housing for Māori on whenua Māori and barriers to delivery are actively addressed."</i></p>
<p>Issue 6. Social / community housing</p> <p><u>Option 6A.</u></p>
<p>Issue 7. Strengthen the focus on housing outcomes in the Strategy</p> <p><u>Option 7A.</u> Update the housing systems challenges in the Strategy to note the changing ethnic diversity requiring different housing market responses The following text is recommended to be added to page 112 under 'Key housing system challenges', as a new housing challenge. It is best positioned between the 9th Challenge and 10th Challenge: <i>"Changing ethnic diversity in the sub region requires different housing market responses, (e.g., for multigenerational living).</i></p> <p>Add a new Housing System Growth Directive 9. <i>"Ensure place-based housing plans clearly respond to the needs of an older and more ethnically diverse population."</i></p> <p><i>Amend the existing Housing system growth directive 2. From "2. Deliver the place-based housing plan through collaboration and leadership," to "2. Deliver the place-based housing plan through collaboration and leadership, including use of local impact investment, such as BOP Housing Equity Fund and via Quayside Holdings Ltd for example, to support delivery of social, affordable to rent and buy housing and housing on whenua Māori.</i></p> <p>Add to the Strategy's Housing Chapter on p.111, the SmartGrowth Housing Action Plan 2020 has been incorporated into the sub regional Housing Systems Plan. <i>"The Sub-Regional Housing Systems Plan builds on the previous SmartGrowth Housing Action Plan 2020 and incorporates strategy that will lead to deliverable actions."</i></p>
<p>Issue 8. Develop monitoring and reporting framework for SmartGrowth sub regional Housing Systems Plan</p> <p><u>Option 8A.</u> Note the submission and make no changes to the Strategy.</p>

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

Date approved:

Approved by:

SmartGrowth Housing System Group – Membership and Terms of Reference

Members of the Housing System Group

Members	
John Holyoake	Western Bay of Plenty District Council (Chair)
Andrew Mead	Tauranga City Council
Annika Lane	Beca Limited
Brian Donnelly	Consultant
Carl Lucca	Tauranga City Council
Craig Batchelar	SmartGrowth Strategic Advisor (Interim)
Darren Toy	Kāinga Ora
Elva Conroy	SmartGrowth – Tu Pakari Kai Ārahi Advisor
Greg Simmonds	Priority One
Jacqui Ferrell	Tauranga Community Housing Trust
Jodie Rickard	Western Bay of Plenty District Council
John McDonald	Ministry of Housing & Urban Development
Matthew Lagerberg	Classic Group
Nichola Lennard	GMD Consultants / SmartGrowth Support
Nigel Smith	Accessible Properties Ltd
Steve Cutfield	Property Developers Forum
Simone Cuers	Western Bay of Plenty District Council
Te Pio Kawe	SmartGrowth – Tu Pakari Pou Ārahi Advisor
Terri Eggleton	Bay Trust
Support	
Nicola Delaney	SmartGrowth Support

SmartGrowth Housing System Group – Terms of Reference

<p>Membership:</p>	<ul style="list-style-type: none"> ● Chair – to be determined from the group or an independent person <p>A representative from each organisation:</p> <ul style="list-style-type: none"> ● Accessible Properties Ltd ● Kāinga Ora ● Ministry of Housing & Urban Development ● Tāngata Whenua / Iwi Trusts ● Tauranga Community Housing Trust ● The local authorities (Tauranga City Council, Western Bay of Plenty District Council) ● SmartGrowth Pou Arahi and/or Kai Arahi ● Property Developers Forum representative ● Other organisations such as Habitat for Humanity ● Other members as co-opted from time to time <p>Note: Substitute or alternate members are allowed. It is acknowledged that at times, more than one member from an organisation may be required.</p>
<p>Terms of reference:</p>	<ul style="list-style-type: none"> ● To continually analyse and update relevant housing need data and information ● Understand housing issues and delivery strategies. ● Develop a Housing Systems Plan that focuses on delivery actions in the next three to five years ● An initial focus on the shorter-term challenges and strategies for social and affordable housing, but ultimately consider all housing needs across the housing continuum ● Ensure linkages with other work underway (for example the Priority Development Areas and the Joint Spatial Plan) ● Review implementations progress every 3 months and inform the SmartGrowth Senior Leaders Group of this and any other relevant matters
<p>Meeting Frequency:</p>	<p>Monthly or as and when required</p>

Call Etiquette

Microsoft Teams

Please refer to the Outlook calendar invite to access the meeting by ticking on the Microsoft Teams link provided.

Video: Please note, only participants who have speaking and voting rights are to have their cameras on.

Hands up: If you wish to speak, please utilise the “hands up” button.

Say your name: It’s hard to keep track of who is saying what. When you start talking, identify yourself, "This is Penelope, and I have a question," or "Hi, it's James, I'd like to add to that point.”

Use the mute button: Even if you're in a quiet location, please ensure you are on mute.

Silence isn't always golden: Don't forget to unmute yourself when it's your time to talk.

Test equipment: Please test your equipment well before the meeting to ensure everything is working.

On cell phones: Make sure you have:

- A strong signal
- No interference
- Not too much background noise if you will be speaking

On a computer

- If you can, use a wired connection rather than Wi-Fi
- Make sure the computer camera works
- Make sure the speakers work
- Make sure the microphone works

Even if it says you're connected to the platform, make sure you actually are.

Call quality: Using a headset helps with sound quality for both you and others in the meeting.

Being seen on video is an important element of conference call etiquette. It's important for participants to use their video when speaking, or when indicating a desire to speak as this is helpful to the Chair in managing the meeting, accepting that this may not always be possible (e.g. if the connection is not great or you are in a rural location).

Early Departure: If you have to depart the meeting early, please advise the Chair.

WBOP Housing Systems Placed Based Plan (Draft) 15.5.23

What the housing system currently looks like in the Western Bay

The Western Bay of Plenty is a desirable place to live. The population is increasing faster than the national average, and the sub-region currently has a housing shortage. People moving to the Western Bay will continue to create high demand for housing.

The Western Bay has a well documented issue with land supply for housing. The sub-region faces ongoing challenges with infrastructure investment and a complex regulatory environment. This sits alongside the national challenges around the cost of materials and labour which contribute to high housing costs.

The specific characteristics of the Western Bay housing system are:

1. There is limited new land supply for housing coming to market in the short to medium term.
2. Rents and house prices are among the highest in the country and are escalating faster than in other parts of the country.
3. The gap between median incomes and housing costs is widening.
4. More households are now in the 'intermediate' housing market and are unable to achieve home ownership through traditional means.
5. Increases in rent have led to a significant number of households being financially stressed.
6. Existing housing stock is being used for seasonal workers and temporary visitor accommodation. The impact of this is not well understood.
7. Homelessness and the demand for social housing is also growing.
8. In the short term, the planned delivery of social housing by Kāinga Ora and Community Housing Providers is low relative to need. The supply of social housing is starting from a lower base (less than 2% of total housing stock) than in other regions, and the development economics in the Western Bay sub-region make it challenging to deliver social housing projects.
9. The sub-region has an older population than other centres. This means household sizes overall are getting smaller. The housing typology doesn't match the changing household size.
10. However, the majority of market purchasers are not demonstrating a strong desire to "downsize". They are not yet seeing the value of living smaller but closer to services. There are examples of well designed and located one / two-bedroom units and attached dwellings selling well but concerns about smaller sections are often heard throughout the community. they are also more expensive to deliver. Many of the good examples that are being built are at the higher end of market prices.
11. It is imperative to build climate resilient communities, however Western Bay as a community does not yet recognise the benefits of the "15-minute neighbourhood", over the "quarter acre paradise".

12. There are limited examples and products for 'alternative tenures,' such as build-to-rent, co-housing, or shared ownership.
13. The long-term picture suggests intensification and some new greenfields will address the housing shortfall. However, it is not clear that this will address housing affordability. Under the current market dynamics, it is unlikely to.
14. Māori have worse housing outcomes than non-Māori.
15. There are significant opportunities to develop papakāinga on whenua Māori. These opportunities are difficult to realise. The overall planning for papakāinga on whenua Māori is not well advanced. Master planning, feasibility, infrastructure design and construction on whenua Māori requires significant investment to deliver housing over the next 10 years.
16. There are some significant pockets of sub-standard housing in the sub-region, with a wide range of negative impacts for households living in these conditions.
17. In the very short term, delivery of housing by the private sector is facing a downturn. This will have a flow-on effect on capacity to deliver as the economy improves. The current downturn in delivery by the private sector provides opportunities for social housing build as many developers are actively seeking to sell land currently, to Kāinga Ora and Community Housing Providers.

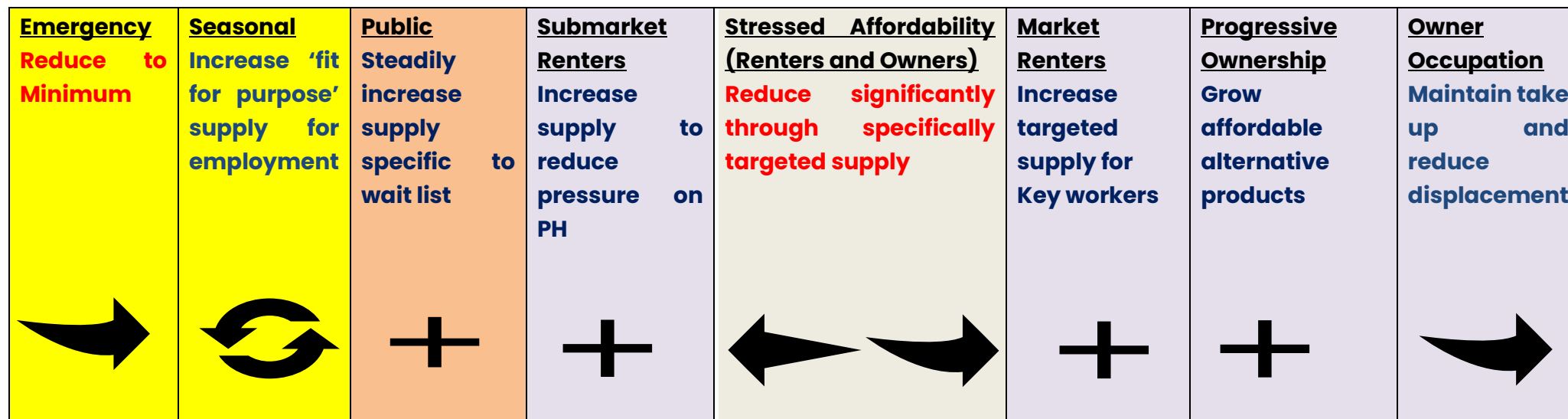
What the major impacts are:

- Displacement of essential workers who can't afford to own or rent in the sub-region.
- Increasing number of older people needing affordable rental accommodation, with limited options in the private market.
- Ongoing decline in home ownership rates and increasing decline in home ownership rates for Māori.
- Continuing and increasing reliance on emergency housing special needs grants for those most affected by the lack of social housing and affordable rentals.
- Housing stock that continues to be mismatched to household sizes.

Strategies

Approach and Tactics for WBoP Housing System Placed Based Plan (focus on short term 0 to 3 years)

Our approach and tactics are about understanding in the short term what could make a difference if we focus resources in particular areas across the continuum.



Critical Strategies (0–3–year short term)	Elements for each strategy that will lead to deliverable actions	Lead	Priority / Timing
1) Leadership identified and equipped to drive delivery of the placed based housing plan through collaboration. (Local leadership with all agencies, lwi and private sector interests represented)	Establish a committed leadership group to enable and get actionable projects and programmes delivered	John Holyoake	
	Roles, responsibilities, and accountabilities are clearly defined and owned by key participants	All	
	Undertake stocktake of all projects currently committed that are delivering social and affordable outcomes and determine where they contribute to the key strategies.	MHUD	
	Monitoring and market intel function is in place to review and tweak progress as required	MHUD	

Critical Strategies (0–3–year short term)	Elements for each strategy that will lead to deliverable actions	Lead	Priority / Timing
	Develop medium term plan (3 to 10 years) once majority of short-term actions are underway		
	Track & monitor progress of all strategies for the WBoP system plan		
2) Increase affordable housing supply targeted to stressed households – renters (submarket and market), alternative tenures, progressive ownership (Kiwibuy wider Govt build programmes) and lwi	Grow development capability and capacity of CHPs and lwi to introduce and implement affordable supply across rental, ownership and alternative tenure options.		
	Specific new project opportunities to be identified and progressed with funding support from AHF, Build Ready, Kiwibuild, WKWO, PHO, Papakainga TPK, and BOP Housing Equity Fund depending on the deliverables.		
	Developments where possible to deliver 1- and 2-bedroom new housing supply for targeted (singles / elderly need) – utilise BTR, BoP Equity Fund, AHF		
	Introduce Kiwibuy programmes to attract market renters into ownership (new and existing purchase) – utilise established products such as First Home Partner, Housing Foundation, HFH, and YouOwn		
	Increase supply and take up of mature adult retirement (affordable rent and ownership) LTO villages to free up existing housing for market options – innovation required		
	Identify and address barriers to accessing products such as shared ownership programme, such as ensuring products are user friendly, fit for purpose and are well understood in the market.		
3) Urgently reduce households being housed in unsatisfactory emergency accommodation	Secure control of selective motels and reconfigure for end intended use – (i.e. short-term transition and more permanent tenures).	MHUD	
	Establish program to prioritise placement of households in emergency accommodation, (motels, backpackers and Covid motels) into social housing placements via APL, Kainga Ora and Community Housing Providers. Use the homeless taskforce Kāinga Tupu to achieve this. MHUD commits resources to reduce risk for social housing providers to enable placements of people with complex needs.	APL, Kāinga Ora, CHPs, Kāinga Tupu with	

Critical Strategies (0–3-year short term)	Elements for each strategy that will lead to deliverable actions	Lead	Priority / Timing
		support from MHUD and MSD	
	Healthy homes retrofits of sub-standard housing via increasing support for Twenty Degrees Programme and iwi-led initiatives to improve existing housing.		
4) Increase public housing supply steadily to align typologies of new and existing stock to better match needs.	MHUD and MSD to urgently review the waitlist and emergency housing registers, along with accommodation supplement trends, to determine how quickly local demand is increasing and inform better targeting of matched accommodation to need.	MHUD, MSD	
	Develop a social housing delivery plan for sub region based on findings of review above.		
	Support CHPs to implement known development plans in Gate Pa / Pukehinahina and Te Puke, which deliver 1 and 2-bedroom typologies		
	KO to increase their short-term pipeline of new build house supply through either purchase of land and building or turnkey purchase from private developments already underway.	KO	
	Accessible (APL), KO, and MHUD to structurally review status of agreements and funding lines to establish a path forward that accelerates the better utilisation and supply of the current public housing stock owned by APL.		
5) Increase provision of fit-for-purpose seasonal and visitor accommodation.	Ensure planning rules enable RSE accommodation on underutilized brownfields and employer land		
	Attract investment and initiate delivery of new tourist accommodation		
	Encourage growers to provide medium term 'fit for purpose' accommodation – and reduce dependency on needing to displace other rental accommodation and motel beds.		

Critical Strategies (0–3–year short term)	Elements for each strategy that will lead to deliverable actions	Lead	Priority / Timing
6.) Lead intensification projects incorporating a mix of tenures and typologies, that demonstrate intensification done well.	Work with TCHT and APL in Pukehinahina and Te Puke on projects that demonstrate intensification done well.		
	Private developers to utilise HUD and KO products such as 'Build Ready' and 'KiwiBuild' to enable demonstration projects of intensification to be underwritten – particularly on the Te Papa peninsula.		
	Kāinga Ora to instigate projects for social or affordable using as demonstration projects to illustrate what's possible, in the knowledge they may not meet their normal investment thresholds.	Kāinga Ora	
7) Iwi, hapū and Māori land trusts housing / Papakāinga aspirations on whenua Māori are supported and realised	Actively support Te Ihu o Te Waka's development planning on whenua Māori so that once planning is completed, Papakāinga delivery can occur and a 20-year pipeline of housing across the rohe is identified for funding. This includes funding applications to Whai Kāinga Whai Oranga as well as access to other funding to advance Māori housing outcomes.		
	Actively support Ararau Tangata in Tauranga Moana to progress their development projects on whenua Māori.		
	Engage with hapū on specific needs and identify partnership opportunities between central government and iwi / hapū to deliver affordable housing that meets the needs of Māori. (I.e. Not on whenua Māori but within other housing developments).		
	Provide ongoing funding support for capability and capacity building for iwi and hapu, including funding for professional services such as project managers, planners, urban designers/architects and development engineers.		
8) Proactively support interfaces with established programmes and initiatives across the rohe that impact or can influence the delivery of social and affordable housing outcomes	<p>For Smartgrowth PDA's</p> <ul style="list-style-type: none"> - Support each growth project to ensure steady supply of land long term for affordable housing intended outcomes. - Track implementation of the business case and development outcomes for Tauriko west, Omokoroa – track consents, infrastructure and use best endeavours to include provisions for affordable housing into rollouts. 		

Critical Strategies (0–3–year short term)	Elements for each strategy that will lead to deliverable actions	Lead	Priority / Timing
	<ul style="list-style-type: none"> - Develop Business case for Te Kainga – include provisions for public, affordable rental and ownership, 15 min LWP community, confirm level of central Govt procurement and methodology to progress. 		
	<p>Assist TCC with other potential strategic land use initiatives – such as Smiths Farm and Parau Farms to specifically incorporate social and affordable supply of housing</p>		
	<p>For Te Puke Housing Placed Based Plan</p> <ul style="list-style-type: none"> - Support the housing network established in Te Puke and assist with the growth and project initiatives already identified and underway. - Track & monitor progress and ensure alignment with strategies for the WBoP system plan. 		
	<p>For Katikati Housing Placed Based Plan</p> <ul style="list-style-type: none"> - Support the housing network about to start work in Katikati and assist with identified growth and project initiatives. - Track & monitor progress and ensure alignment with strategies for the WBoP system plan. 		

SmartGrowth Strategy 2023–2073

ISSUES AND OPTIONS PAPER

General

Author: Craig Batchelar

Topic	Parts 1 & 2 and General
Issues	<ol style="list-style-type: none"> 1. Oppose 2. Changes to Vision – other UGPs 3. Changes to Vision – Tangata Whenua values 4. Objectives, Challenges, Opportunities 5. Transformational Shifts 6. Implementation Plan – specific actions to be included. 7. Consultation & Engagement 8. SmartGrowth Partnership 9. Hamilton to Tauranga Corridor

Staff Narrative

Overview of feedback received

12 submitters generally support the Strategy. No further evaluation of these submissions is necessary.

Issue 1: Oppose the Strategy

22 submitters generally oppose the Strategy. Four submissions in this category include a request to rationalise SmartGrowth, TSP, UFTI documents into a united framework with consistent figures; provide for more public consultation; revisit the growth scenario based on population ageing and workforce decline, stop planning too far ahead; and work more closely with the development community.

Issue 2: Changes to Vision based on other UGP Strategies

SocialLink has proposed changes to the Vision to reflect contemporary perspectives – based on other UGP visions.

Issue 3: Changes to Vision to reflect tangata whenua values

SocialLink has proposed including tangata whenua values on page 61 of the Strategy into the Vision statements on page 16.

Issue 4: Objectives (page 17), challenges and opportunities (pages 38–40)

National Council of Women propose that Population Change be included as a challenge. Envirohub submit that the deteriorating state of the environment and the loss of biodiversity be added as a challenge and that the Opportunities should note the high level of active awareness there is of the natural environment. Envirohub also propose that Social Objectives on page 17 do not include any focus on people. This should be developed and include a statement on equitable outcomes.

Issue 5: Transformational Shifts

The Property Council, Urban Taskforce and Clear the Air and Tauranga Moana Fumigant propose adding further transformational shifts to prioritise social infrastructure and access to public amenities, environmental and climate resilience, protecting highly productive land and Mount Maunganui airshed pollution.

Issue 6: Implementation & Funding Plan – Specific Actions

Two submitters (Urban Task Force and Property Council) propose a range of funding and financing models in the implementation plan, including using the Infrastructure Funding and Financing Act, Public Private Partnerships and direct Central Government investment.

Two submitters (SBOP and Julie Andrews) do not support public private partnerships and funding should be through central government.

SocialLink also opposes the use of the IFF.

Ngai Tukairangi Trust request that SmartGrowth consider mechanisms to assist hapu in the sub-region to develop their own spatial plans and revise/update existing planning documents.

Urban Task Force requests actions in the implementation plan to include a requirement for partners to collaborate and to reach solutions using a taskforce/working group, require review of delivery and cooperation between the Partners and their performance, engage more with the development community and implement National Planning Standards for 'industrial' zones.

Other specific suggestions are that the development Sector Group (DSG) should be formally included in the SmartGrowth structure, with representation on the SmartGrowth Leadership Group; that a full Project Plan and Resourcing Plan be prepared for the FDS and that a SmartGrowth / FDS Implementation Office be established with adequate funding and resources to deliver the FDS.

Issue 7: Consultation and Engagement

Key themes are that the opinions and viewpoints of the general community have not been allowed for in the month-long SCP process and the amount of information could be quite off-putting.

Issue 8: SmartGrowth Partnership

The focus of these submissions are on the reestablishment of the SmartGrowth Forums, in particular the Strategic Partners Forum and that representatives from the Social and Environment Sector and KiwiRail be included on the SmartGrowth Governance Group (SLG) Note that the DSG has also requested representation on the SLG.

Issue 9: Hamilton to Tauranga Corridor

A submission by SmartGrowth seeks in inclusion of the Hamilton to Tauranga Investment Programme in the Strategy.

Waikato and Bay of Plenty regions are working on a joined-up approach to the Hamilton to Tauranga Corridor given the significance of this connection. There are shared objectives and priorities, and a joint investment programme has been prepared. The joint investment programme is based around fuelling sustainable economic growth for New Zealand by highlighting the national importance of this strategic corridor which connects export industries through the Ports of Tauranga and Auckland and inland ports.

The recently notified Future Proof FDS includes the same provisions.

Options Overview

Issue 1: Oppose elements of the Strategy and propose to rationalise the SG, TSP and UFTI documents, revisit the growth scenario, work more closely with the development sector.

Option 1A	Note the submissions and make no changes to the strategy. (Recommended)
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Option 1B	Rationalise SmartGrowth, TSP, UFTI documents into a united framework with consistent figures. Revisit the growth scenario.(Not Recommended)
Issue 2: Changes to Vision to reflect contemporary perspectives – based on other UGPs	
Option 2A	That the vision for the strategy is retained as per the version released for consultation (Recommended)
Option 2B	Change the Vision to reflect contemporary perspectives as follows: <ul style="list-style-type: none"> • 'Liveable, safe, sustainable and healthy place.'(Greater Christchurch); and/or • 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)
Issue 3: Incorporating the values expressed by tangata whenua on pg 61 of the Strategy into the vision.	
Option 3A	Incorporate the following values from page 61 into the Strategy Vision on page 16 "Manaakitanga – respect and care for others: We build warm and affordable homes and communities for all socioeconomic backgrounds. We also are good ancestors who plan and make decisions for our mokopuna and future generations. Kaitiakitanga – environmental responsibility and reciprocity: We are dependent on the natural world for their well-being and survival and therefore have a responsibility to care for and protect the environment in return. We are good ancestors who leave the natural environment in a better state for our mokopuna and future generations. Environmental reciprocity involves moving away from an exploitative mindset and creating a more balanced relationship between human activity and nature to ensure the health and wellbeing of all."
Option 3B	Do not incorporate the following values from page 61 into the Strategy Vision on page 16 "Manaakitanga – respect and care for others: We build warm and affordable homes and communities for all socioeconomic backgrounds. We also are good ancestors who plan and make decisions for our mokopuna and future generations. Kaitiakitanga – environmental responsibility and reciprocity: We are dependent on the natural world for their well-being and survival and therefore have a responsibility to care for and protect the environment in return. We are good ancestors who leave the natural environment in a better state for our mokopuna and future generations. Environmental reciprocity involves moving away from an exploitative mindset and creating a more balanced relationship between human activity and nature to ensure the health and wellbeing of all."

Issue 4: Objectives – proposed additions to page 17 and Challenges and Opportunities– pages 38-40	
Option 4A	Change the Strategy Challenges, Opportunities and Objectives to reflect the following. Include Population Change and Deteriorating State of the Environment and Loss of Biodiversity as new Challenges on page 38. Add “high level of active awareness there is of the natural environmental from most of our citizens” to opportunities on page 40. Add a statement on equitable outcomes to the social objectives on page 17.
Option 4B	No changes to the Strategy Challenges, Objectives and Opportunities
Issue 5: Transformational Shifts: Proposed changes to transformational shifts	
Option 5A	Add a seventh transformational shift to reflect further investment in social infrastructure such as public and community amenities, noting the significant underinvestment in such infrastructure. Expand the proposed eco-system 'transformational shift' to include environmental and climate resilience. Incorporate the economic imperative to protect the region's highly productive land within the transformational shifts. Add resolving Mount Maunganui Airshed pollution to the transformational shifts.
Option 5B	Make no changes to the Transformational Shifts
Issue 6: Implementation & Funding Plan – Specific Actions to be Included	
Option 6A	That the requested actions be noted and referred to the Implementation and Funding Plan Working Group for consideration
Issue 7: Consultation & Engagement: Key themes are that the opinions and viewpoints of the general community has not been allowed for in the month-long SCP process and the amount of information could be quite off-putting.	
Option 7A	Note the submissions on the Strategy consultation and engagement process and consider these suggestions for future SmartGrowth consultation processes.
Issue 8: SmartGrowth Partnership: The focus of these submissions is on the reestablishment of the SmartGrowth Forums, in particular the Strategic Partners Forum and that representatives from the Development Sector Group, Social and Environment Sector and KiwiRail are included on the SmartGrowth Governance Group (SLG). Also engaging early with the Priority Development Areas process.	
Option 8A	The matters raised in relation to membership of the SmartGrowth Leadership Group and re-establishment of the SmartGrowth Forums are referred to SLG for its consideration alongside the development of a Communications and Engagement Plan that will take the SG programme through implementation of the Strategy and lead up to a review in 2027
Issue 9: Hamilton to Tauranga Corridor: A submission by SmartGrowth seeks in inclusion of the Hamilton to Tauranga Investment Programme in the Strategy. Waikato and Bay of Plenty regions are working on a joined-up approach to the Hamilton to Tauranga Corridor given the significance of this connection. There are	

shared objectives and priorities, and a joint investment programme has been prepared. The joint investment programme is based around fuelling sustainable economic growth for New Zealand by highlighting the national importance of this strategic corridor which connects export industries through the Ports of Tauranga and Auckland and inland ports.

Option 9A	Include the Hamilton to Tauranga Investment Programme in the SmartGrowth Strategy.
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Issue 1: Oppose elements of the Strategy and propose to rationalise the SG, TSP and UFTI documents, revisit the growth scenario, work more closely with the development sector.

Option 1A:

Note the submissions and make no changes. Note that the growth scenario evidence base has undergone significant expert analysis and will be revisited in the next iteration of the Strategy in a few years' time. The Strategy incorporates the UFTI connected centres programme and key elements of the TSP programme. SmartGrowth advisors regularly report to the Development Sector Group which is considered to be a key SmartGrowth stakeholder. (Recommended)

Advantages

- The Strategy has incorporated the key elements of UFTI and TSP.
- The growth scenarios are evidence-based using most recent demographic and economic analysis and an updated HBA. It is not clear on what basis that this would provide any clearer evidence base.

Disadvantages

- Would not address the submitters issues.

Financial implications

Nil

Other considerations:

The Strategy Background and SmartGrowth Journey sets out how the TSP and UFTI and JSP provide the evidence base for the Strategy and FDS. This development of policy is also addressed in the Urban Form and FDS IOPs. Once the Strategy is adopted the UFTI will become a background document that would only need to be referenced in decision-making where the direction provided within the Strategy was absent or unclear.

Option 1B:

Rationalise SmartGrowth, TSP, UFTI documents into a united framework with consistent figures. Revisit the growth scenario. (Not Recommended)

Advantages

- Rationalise SG, TSP, UFTI – provides an opportunity to ensure numbers are consistent across the documents, and further stakeholder inputs.
- Revisit growth scenario based on population ageing and workforce decline, stop planning too far ahead –More granular population data on aging has been recognised as beneficial in other IOPS. A shorter timeframe would provide greater certainty but would not support the need for long term 30-year planning required by the FDS

Disadvantages

- The Strategy has incorporated the key elements of UFTI and TSP.
- The growth scenarios are evidence-based using most recent demographic and economic analysis and an updated HBA. It is not clear on what basis that this would provide any clearer evidence base.

Financial implications	
A revisit of these projections would be costly and time-consuming. There is no budget allocation for this.	
Other considerations:	
Nil	
Issue 2: SocialLink requests changes to Vision to reflect contemporary perspectives – based on other UGPs	
Option 2A: That the vision for the strategy is retained as per the version released for consultation (Recommended)	
<p>Advantages</p> <ul style="list-style-type: none"> The current vision of “A great place to live learn work and play” captures the multi-faceted nature of the Strategy. It reflects the shift away from a singular focus on land for housing which characterised urban growth planning prior to SmartGrowth. Read as a whole, the Strategy includes consideration of contemporary perspectives referred to in the submission. 	<p>Disadvantages</p> <ul style="list-style-type: none"> The vision does not reflect contemporary perspectives upfront, such as the priority to climate change response.
Financial considerations:	
Nil	
Other Considerations:	
The need for an updated vision could be reconsidered at the next review of the Strategy (2027).	
Option 2A: Change the Vision (“A great place to Live, Learn, Work Play”) to reflect contemporary perspectives such as:	
<ul style="list-style-type: none"> • 'Liveable, safe, sustainable and healthy place.'(Greater Christchurch); and/or • 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>Advantages</p> <ul style="list-style-type: none"> These suggestions could better reflect contemporary perspectives. 	<p>Disadvantages</p>
Financial considerations:	

The Vision has already gone through a consultation process through key SmartGrowth stakeholders and Partnership. The time taken to reconsider the vision needs to be weighed up against the cost and risk of delay in adopting the final Strategy. With limited resources the focus should be substantive outputs.

Other Considerations

Issue 3: Incorporating the values expressed by tangata whenua on pg 61 of the Strategy into the vision.

Option 3A: Incorporate the following values from page 61 into the Strategy Vision on page 16

“Manaakitanga – respect and care for others:

We build warm and affordable homes and communities for all socioeconomic backgrounds. We also are good ancestors who plan and make decisions for our mokopuna and future generations.

Kaitiakitanga – environmental responsibility and reciprocity:

We are dependent on the natural world for their well-being and survival and therefore have a responsibility to care for and protect the environment in return. We are good ancestors who leave the natural environment in a better state for our mokopuna and future generations. Environmental reciprocity involves moving away from an exploitative mindset and creating a more balanced relationship between human activity and nature to ensure the health and wellbeing of all.” (Not recommended)

Advantages

- Including these tangata whenua values in the Vision statement may resonate more with iwi/hapu/whanau than the current Vision statement

Disadvantages

- These values are already incorporated into the Strategy on page 61.
- Read as a whole, the Strategy includes consideration of these values.

Financial implications

Time and cost required to consult with on a revised vision for this Strategy. The time taken to reconsider the vision needs to be weighed up against the cost and risk of delay in adopting the final Strategy. With limited resources the focus should be substantive outputs.

Other considerations

The need for an updated vision could be reconsidered at the next review of the Strategy (2027).

Option 3B: Do not incorporate the tangata whenua values and note that these values are already incorporated into the Strategy on page 61. (Recommended)

<p>Advantages</p> <ul style="list-style-type: none"> • These values are already incorporated into the Strategy on page 61. Read as a whole, the Strategy includes consideration of these values. 	<p>Disadvantages</p> <ul style="list-style-type: none"> • Lost opportunity to incorporate tangata whenua values into the Vision statement.
<p>Financial implications</p>	
<p>Other considerations</p>	
<p>The need for an updated vision could be reconsidered at the next review of the Strategy (2027).</p>	
<p>Issue 4: Objectives – page 17 and Challenges and opportunities– pages 38–40</p> <ul style="list-style-type: none"> • National Council of Women propose that Population Change be included as a challenge. • Envirohub submit that the deteriorating state of our Environment and the Loss of Biodiversity be added as a challenge • Envirohub submits that the Opportunities should note the high level of active awareness there is of the natural environmental from most of our citizens. • Envirohub propose that Social Objectives on page 17 do not include any focus on people. This should be developed and include a statement on equitable outcomes. 	
<p>Option 4A: Change the Strategy Challenges, Opportunities and Objectives to reflect the following. Add “high level of active awareness there is of the natural environmental from most of our citizens” to opportunities on page 40. Add a statement on equitable outcomes to the social objectives on page 17. (Recommended)</p>	
<ul style="list-style-type: none"> • Advantages • Recognises the community’s active participation in the environment. • Places emphasis on this outcome which is consistent with the Strategy’s Vision. 	<ul style="list-style-type: none"> • Disadvantages • Population change and impact of growth (including maps) is already covered in detail on pages 33–37 and is the overarching challenge and the basis for a Strategy that deals with planning for growth. Challenge 6 already covers deteriorating state of the environment and loss of biodiversity.
<p>Financial implications</p>	
<p>Minor</p>	
<p>Other considerations</p>	

Population Change and Deteriorating State of the Environment and Loss of Biodiversity are addressed in other IOPS: Social Infrastructure Transport, Urban Form and FDS.

A commentary equitable outcomes is included in the Social Infrastructure IOP. The essential issues is that each community has a different starting point in terms of what is currently provided and their priorities, demographics and deprivation profile. While the strategy sets the intent of what we want to achieve, how we achieve it on the ground might be different from community to community.

Option 4B: No changes to the Strategy Challenges, Objectives and Opportunities (Not recommended)

Advantages

- Population change and impact of growth (including maps) is already covered in detail on pages 33–37 and is the overarching challenge and the basis for a Strategy that deals with planning for growth. Challenge 6 already covers deteriorating state of the environment and loss of biodiversity.
- R

Disadvantages

- Lost opportunity to enhance the Strategy by including these changes.

Financial implications

Nil

Other considerations

Nil

Issue 5: Changes to Transformational Shifts:

The Property Council of NZ submits that SmartGrowth undertakes work to further refine the 'transformational shifts' for change as follows:

- Greater consideration of access to public amenities and by extension the development of thriving communities. Access to public amenities and community has been affected by historic underinvestment across the region and should be considered with the 'transformational shifts'.
- expanding the proposed eco-system 'transformational shift' to include environmental and climate resilience, especially in light of this year's extreme weather events.
- notes the ongoing economic imperative to protect the region's highly productive land within the proposed shifts and wish to also see this incorporated within the framework.

The Urban Taskforce proposes a seventh shift, this being the need for further social infrastructure such as public and community amenities to be recognized. The reason for this is that there has been significant underinvestment in such infrastructure by successive councils in Tauranga, and the city remains in "catch up mode". This is also noted by the Bell Road Limited Partnership.

Clear The Air & Tauranga Moana Fumigant note that resolving Mount Maunganui Airshed pollution has to be a priority that is at least equal to those identified, because it addresses real human health risks.

Option 5A:

Add a seventh transformational shift to reflect further investment in social infrastructure such as public and community amenities, noting the significant underinvestment in such infrastructure.

Expand the proposed eco-system 'transformational shift' to include environmental and climate resilience.

Incorporate the economic imperative to protect the region's highly productive land within the transformational shifts.

Add resolving Mount Maunganui Airshed pollution to the transformational shifts.

(Not Recommended)

Advantages

- Adding a further transformational shift on social infrastructure and public amenities is consistent with the "live, work, play" vision.
- Expanding the proposed eco-system 'transformational shift' to include environmental and climate resilience would provide further context to this shift and emphasizes the importance of climate resilience.
- Incorporating the economic imperative to protect the region's highly productive land within the transformational shifts will highlight the statutory requirement under the NPS-HPL.
- Resolving Mount Maunganui Airshed pollution is a significant issue of public concern.

Disadvantages

- There is a section in the Strategy focusing on key social infrastructure and well-being challenges, with a comprehensive list of growth directives . The delivery of social infrastructure is a core component of councils' delivery and already addressed adequately in the Strategy and through delivery mechanisms such as LTPs.
- The importance of environment and climate resilience is covered in detail throughout the Strategy - in particular in Part 3, chapters 1, 3 and 4. The Strategy includes climate resilient development principles which are integrated into the connected centres programme. As a fundamental set of Strategy principles this is already included as business as usual and does not need a separate transformational shift.
- Protect the region's highly productive land is already a statutory requirement this should be business as usual in planning, has already been taken into account in the Spatial Plan mapping and not a transformational shift in this context.
- This Mount Maunganui Airshed issue has been raised as part the Mount to Arataki Spatial Plan. The Strategy is not the most appropriate place to be dealing with specific and detailed planning issues other than providing a framework for aligning such matters with the Strategy direction. The need for separation between

	industrial land use and sensitive areas is already recognised in existing regional and district plans and isn't a transformational shift.
Financial implications	
Minor	
Other considerations	
The purpose of the transformational shifts is to identify areas that are not "business as usual" components, to reflect the areas that require focussed attention to bring about change.	
Option 5B: Make no changes to the Transformational Shifts (Recommended)	
Advantages <ul style="list-style-type: none"> The existing transformational shifts identify critical areas of intervention that are not "business as usual" components and reflect the areas that require particular attention to bring about change. A greater number of transformational shifts would detract from the focus and increase complexity, with limited benefit. 	Disadvantages <ul style="list-style-type: none"> Submitters may consider that important issues have not been given sufficient attention, and that their issues are not in fact "business as usual".
Financial implications	
Minor	
Other considerations	
The need for an updated Transformational Shifts could be reconsidered at the next review of the Strategy (2027) considering whether the areas of focus for transformation have become "business as usual" and to address any new and emerging critical issues.	
Issue 6: Implementation and Funding and Financing Plan – Specific Actions to be Included Classic, Fordland and Tumu Kaituna 14 Trust submit that there should be more developer input with a specific request from Fordland and Tumu Kaituna 14 Trust for a SmartGrowth / FDS Implementation Office be established with adequate funding and resources to deliver the FDS. Urban Task Force submits that actions should be included as follows: <ul style="list-style-type: none"> Require Regional & District Councils to collaborate and to reach solutions using a taskforce/working group tasked with identifying and implementing solutions to unlock land in a timely and efficient manner. Require review of delivery and cooperation between the Partners and their performance. Developers engaging with the Priority Development Areas process. 	

Property Council advocates for targeted rates, user-pays systems, and Special Purpose Vehicles ("SPVs") as enabled under the Infrastructure Funding and Financing Act ("IFF") and continued advocacy from SmartGrowth and its partners for greater central government investment in development enabling infrastructure.

The Urban Taskforce supports a range of different funding and finance models including options for public-private partnerships (PPPs). The Urban Taskforce also supports the use of the IFF Act with respect to the funding of infrastructure and greater Central Government investment.

Two submitters (SBOP and Julie Andrews) do not support public private partnerships and funding should be through central government.

SBOP also opposes the use of the IFF.

Ngai Tukairangi Trust would like the SGS to better fund an implementation programme that assists hapu in the sub-region to develop their own spatial plans or revise and update existing planning documents.

Option 6A

That the requested actions be noted and referred to the Implementation and Funding Plan process for consideration (Recommended)

Advantages

- The submission points are implementation issues that do not need to be included in the Strategy.
- Consideration in the formulation of the Implementation and Funding Plan will ensure that these suggestions are not "lost"

Disadvantages

Financial implications

Minor

Other considerations

Some issues concern resourcing and the quality of delivery (collaboration, review, stakeholder engagement) that need to be addressed in the overall leadership and management of SmartGrowth.

Issue 7: Consultation and Engagement

Key themes are that the expression of opinions and viewpoints of the general community has not been sufficiently allowed for in the month-long SCP process and the amount and complexity of information is a barrier to engagement.

Several submissions suggest ways to improve engagement.

Beth Bowden proposes that in the absence left by the SmartGrowth Forums, some combined consultative workshops could bring together various compulsorily consulted parties with community-based experts across a range of fields. The structure of the online survey could mirror that of the Strategy Document itself as there is an apparent internal logic to the "story" of the Strategy. The survey's approach encourages a single-issue response from submitters.

SBN proposes consultation process should:

- 1) Offer a guided written submission process (including multi-choice answers where appropriate) for people who want to share their views but don't have the knowledge of time or writing skills to type up responses for each section.
- 2) Still also offer the comment boxes, for people to add any extra wording they wish.
- 3) Run a community engagement session in each part of the sub-region, to get wider feedback and support the needs of people who respond better through group sessions and/or oral language, including many Tangata Whenua, some other ethnic groups, some people with disabilities, and many others who respond better in groups settings where other people bring up ideas and stimulate innovative thinking and shared solutions.

Option 7A: Note the submissions on the Strategy consultation and engagement process and consider these suggestions for future SmartGrowth consultation processes through an action in the Implementation and Funding Plan to prepare an updated Communications and Engagement Plan that will take the SG programme through implementation of the Strategy and lead up to a review in 2027. (Recommended)

Advantages

- The Statutory requirements for the SCP have been met.
- Further consultation on implementation of aspects of the Strategy will be undertaken through Council plans such as the LTP, RLT and through targeted actions under the Implementation and Funding Plan
- Noting these suggestions acknowledges the need for enhanced community engagement in future SmartGrowth processes and directs further discussion on the points raised by submitters.
- Providing for more public consultation in future would enable the wider community to be more engaged in the process and provide for more targeted engagement (e.g youth, Tangata Whenua).

Disadvantages

These suggestions can only apply to future processes, as wider consultation on this Strategy is out of scope for this Version. Further consultation on implementation of the Strategy will be undertaken through other Council plans and processes such as the LTP, RLTP and community development planning.

Financial implications

The suggestions will require additional resourcing, but this cannot be quantified at this stage.

Other considerations

NPS-UD/FDS timeframes and need to progress adoption of the Strategy limit the scope for further engagement on the Strategy and FDS. Under the current Communications and Engagement Plan, SG partners have lead engagement with their own communities, that they know and understand using existing processes. Smartgrowth has focussed on specific stakeholder engagement. This has possibly created a perception that SG has undertaken little of no engagement with the wider community, as partner engagement on SG has not been transparently reported. Many of the issues raised can be need to be considered in the context of an updated Communications and Engagement Plan that will take the SG programme through implementation of the Strategy and lead up to a review in 2027.

There are many opportunities to enhance communications and engagement, but always mindful of the need to coordinate this with the work of partners.

Issue 8: SmartGrowth Partnership

Submissions seek reestablishment of the SmartGrowth Forums, in particular the Strategic Partners Forum and that representatives from the Social and Environment Sector and KiwiRail are included on the SmartGrowth Governance Group (SLG)

Bell Road Limited Partnership submit that the Development Sector Group be formally included in the SmartGrowth structure, with representation on the SmartGrowth Leadership Group, as it is for Tangata Whenua and Infrastructure Partners.

Option 8A: That the matters raised in relation to membership of the SmartGrowth Leadership Group and re-establishment of the SmartGrowth Forums are referred to SLG for its consideration alongside the development of a Communications and Engagement Plan that will take the SG programme through implementation of the Strategy and lead up to a review in 2027. (Recommended)

Advantages

- Increased assurance and transparency to key sectors that their voices are valued and being taken into account in decision making.

Disadvantages

- Increased cost and complexity of partnership.

Financial implications

Not known, but the additional costs will arise from expanded formal engagement and governance.

Other considerations

Reestablishment of the Partner Forums indicates a wider concern over consultation and engagement as discussed in issue 7 above.

Matters relating to representation on the Governance Group can be considered for recommendation to the SLG/Partner Councils.

Engagement and membership of the SLG is a matter for Governance to decide. This should be considered alongside the development of a Communications and Engagement Plan that will take the SG programme through implementation of the Strategy and lead up to a review in 2027.

Issue 9: Hamilton to Tauranga Corridor

A submission by SmartGrowth seeks inclusion of the Hamilton to Tauranga Investment Programme in the Strategy.

Option 9A: Hamilton to Tauranga Corridor

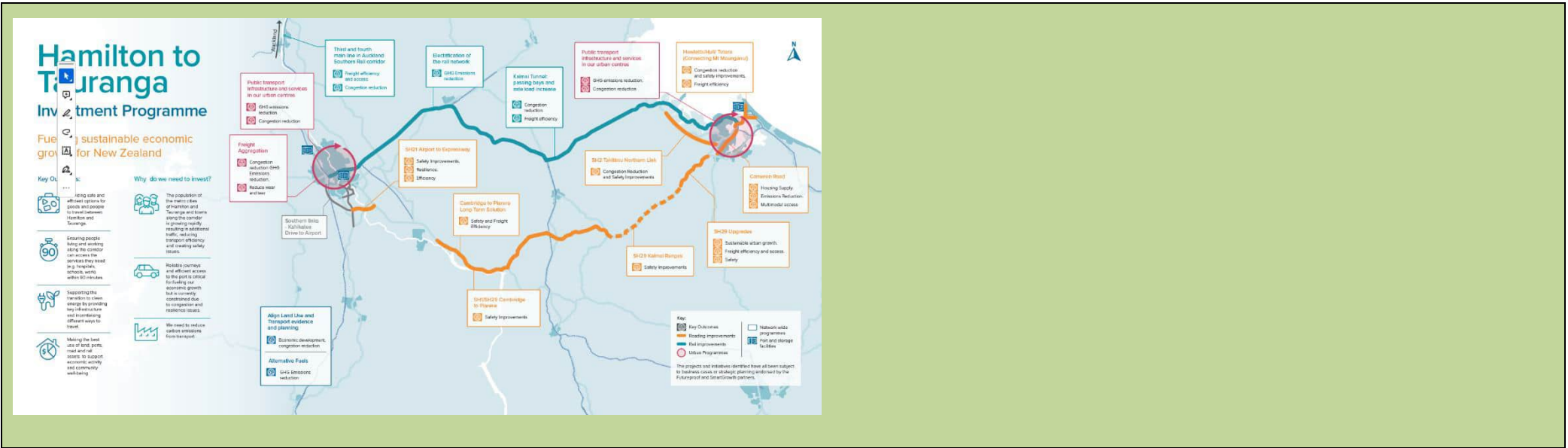
Include the Hamilton to Tauranga Investment Programme in the SmartGrowth Strategy.

"Hamilton to Tauranga Corridor

The Waikato and Bay of Plenty regions has a joined-up approach to the Hamilton to Tauranga Corridor given the significance of this connection.

There are shared objectives and priorities, and a joint investment programme has been prepared (see Figure below).

The joint investment programme objective is to fuel sustainable economic growth for New Zealand by highlighting the national importance of this strategic corridor which connects export industries through the Ports of Tauranga and Auckland and inland ports".



Advantages

- The joint investment programme objective is to fuel sustainable economic growth for New Zealand by highlighting the national importance of this strategic corridor which connects export industries through the Ports of Tauranga and Auckland and inland ports.
- The joint investment programme aggregates and makes transparent the investment decisions that have already been made by central and local government within the corridor in road rail and port infrastructure.

Disadvantages

-

Financial implications

Nil

Other considerations

The recently notified FutureProof FDS includes the same provisions, as agreed between SmartGrowth and FutureProof. The joint investment programme is consistent with provisions in the RLTP.

Recommended Decisions
<p>Issue 1: Oppose elements of the Strategy and propose to rationalise the SG, TSP and UFTI documents, revisit the growth scenario, work more closely with the development sector.</p> <p>Option 1A: Note the submissions and make no changes. Note that the growth scenario evidence base has undergone significant expert analysis and will be revisited in the next iteration of the Strategy in a few years' time. The Strategy incorporates the UFTI connected centres programme and key elements of the TSP programme. SmartGrowth advisors regularly report to the Development Sector Group which is considered to be a key SmartGrowth stakeholder.</p>
<p>Issue 2: Changes to Vision to reflect contemporary perspectives.</p> <p>Option 2A: That the vision for the strategy is retained as per the version released for consultation</p>
<p>Issue 3: Incorporating the values expressed by tangata whenua on pg 61 of the Strategy into the Vision</p> <p>Option 3B: Do not incorporate the tangata whenua values into the Strategy Vision and note that these values are already incorporated into the Strategy on page 61.</p>
<p>Issue 4: Proposed changes to challenges and opportunities</p> <p>Option 4A: Change the Strategy Challenges, Opportunities and Objectives to reflect the following.</p> <p>Add "high level of active awareness there is of the natural environmental from most of our citizens" to opportunities on page 40.</p> <p>Add a statement on equitable outcomes to the social objectives on page 17.</p> <p>Add "high level of active awareness there is of the natural environmental from most of our citizens" to opportunities on page 40.</p> <p>Add a statement on equitable outcomes to the social objectives on page 17.</p>
<p>Issue 5: Changes to Transformational Shifts:</p> <p>Option 5B: Make no changes to the Transformational Shifts (Recommended)</p>
<p>Issue 6: Implementation and Funding and Financing Plan – Specific Actions to be Included.</p> <p>Option 6A: That the requested actions be noted and referred to the Implementation and Funding Plan process for consideration</p>
<p>Issue 7: Consultation and Engagement</p> <p>Option 7A: Note the submissions on the Strategy consultation and engagement process and consider these suggestions for future SmartGrowth consultation processes through an action in the Implementation and Funding Plan to prepare an updated Communications and Engagement Plan that will take the SG programme through implementation of the Strategy and lead up to a review in 2027.</p>
<p>Issue 8: SmartGrowth Partnership</p> <p>Option 8A: That the matters raised in relation to membership of the SmartGrowth Leadership Group and re-establishment of the SmartGrowth Forums are considered out of scope for deliberations on the SmartGrowth Strategy and be referred to SLG for its consideration.</p>

Issue 9: Hamilton to Tauranga Corridor

Option 9A: Include the Hamilton to Tauranga Investment Programme in the SmartGrowth Strategy.

Decision

Issue 1: Oppose elements of the Strategy and propose to rationalise the SG, TSP and UFTI documents, revisit the growth scenario, work more closely with the development sector.

Option 1A: Note the submissions and make no changes. Note that the growth scenario evidence base has undergone significant expert analysis and will be revisited in the next iteration of the Strategy in a few years' time. The Strategy incorporates the UFTI connected centres programme and key elements of the TSP programme. SmartGrowth advisors regularly report to the Development Sector Group which is considered to be a key SmartGrowth stakeholder.

Reason

The Strategy has incorporated the key elements of UFTI and TSP. The growth scenarios are evidence-based using most recent demographic and economic analysis and an updated HBA. It is not clear on what basis that this would provide any clearer evidence base.

Decision

Issue 2: Changes to Vision to reflect contemporary perspectives.

Option 2A: That the vision for the strategy is retained as per the version released for consultation.

Reason

The current vision of "A great place to live learn work and play" captures the multi-faceted nature of the Strategy. It reflects the shift away from a singular focus on land for housing which characterised urban growth planning prior to SmartGrowth.

Read as a whole, the Strategy includes consideration of contemporary perspectives referred to in the submission.

The need for an updated vision could be reconsidered at the next review of the Strategy (2027).

Decision

Issue 3: Incorporating the values expressed by tangata whenua on pg 61 of the Strategy into the Vision

Option 3B: Do not incorporate the tangata whenua values into the Strategy Vision and note that these values are already incorporated into the Strategy on page 61.

Reason

These values are already incorporated into the Strategy on page 61. Read as a whole, the Strategy includes consideration of these values.

The need for an updated vision could be reconsidered at the next review of the Strategy (2027).

Decision

Issue 4: Proposed changes to challenges and opportunities

Option 4A: Change the Strategy Challenges, Opportunities and Objectives to reflect the following.

Add "high level of active awareness there is of the natural environmental from most of our citizens" to opportunities on page 40.

Add a statement on equitable outcomes to the social objectives on page 17.

Add "high level of active awareness there is of the natural environmental from most of our citizens" to opportunities on page 40.

Add a statement on equitable outcomes to the social objectives on page 17.

Reason

Recognises the community's active participation in the environment. Places emphasis outcomes consistent with the Strategy's Vision. Population change and impact of growth (including maps) are already covered in detail on pages 33-37 and is the overarching challenge and the basis for a Strategy that deals with planning for growth. Challenge 6 already covers deteriorating state of the environment and loss of biodiversity.

Decision

Issue 5: Changes to Transformational Shifts:

Option 5B: Make no changes to the Transformational Shifts

Reason

The existing transformational shifts identify critical areas of intervention that are not "business as usual" components and reflect the areas that require particular attention to bring about change.

A greater number of transformational shifts would detract from the focus and increase complexity, with limited benefit.

The need for an updated Transformational Shifts could be reconsidered at the next review of the Strategy (2027) considering whether the areas of focus for transformation have become "business as usual" and to address any new and emerging critical issues.

Decision

Issue 6: Implementation and Funding and Financing Plan – Specific Actions to be Included.

Option 6A: That the requested actions be noted and referred to the Implementation and Funding Plan process for consideration

Reason

The submission points are implementation issues that do not need to be included in the Strategy.

Consideration in the formulation of the Implementation and Funding Plan will ensure that these suggestions are not “lost”

Decision

Issue 7: Consultation and Engagement

Option 7A: Note the submissions on the Strategy consultation and engagement process and consider these suggestions for future SmartGrowth consultation processes through an action in the Implementation and Funding Plan to prepare an updated Communications and Engagement Plan that will take the SG programme through implementation of the Strategy and lead up to a review in 2027.

Reason

The Statutory requirements for the SCP have been met.

Further consultation on implementation of aspects of the Strategy will be undertaken through Council plans such as the LTP, RLT and through targeted actions under the Implementation and Funding Plan

Noting these suggestions acknowledges the need for enhanced community engagement in future SmartGrowth processes and directs further discussion on the points raised by submitters.

Providing for more public consultation in future would enable the wider community to be more engaged in the process and provide for more targeted engagement (e.g youth, Tangata Whenua).

Decision

Issue 8: SmartGrowth Partnership

Option 8A: The matters raised in relation to membership of the SmartGrowth Leadership Group and re-establishment of the SmartGrowth Forums are referred to SLG for its consideration alongside the development of a Communications and Engagement Plan that will take the SG programme through implementation of the Strategy and lead up to a review in 2027.

Reason

Increased assurance and transparency to key sectors that their voices are valued and being taken into account in decision making.

Decision

Issue 9: Hamilton to Tauranga Corridor

Option 9A: Include the Hamilton to Tauranga Investment Programme in the SmartGrowth Strategy.

Include the following in Part 1 Introduction and Context

“Hamilton to Tauranga Corridor

The Waikato and Bay of Plenty regions has a joined-up approach to the Hamilton to Tauranga Corridor given the significance of this connection.

