

**Before the SmartGrowth Hearings Panel**

**IN THE MATTER** of the Draft SmartGrowth Strategy 2023

**AND**

**IN THE MATTER** of a Submission by Bell Road Limited Partnership

---

**STATEMENT OF EVIDENCE OF AARON COLLIER  
FOR BELL ROAD LIMITED PARTNERSHIP (SUBMITTER 83)  
22 November 2023**

---

1. **Qualifications and Experience**

- 1.1 My full name is Aaron Mark Collier.
- 1.2 I am a Consultant Planner and a Director of Collier Consultants Limited. Prior to establishing Collier Consultants in 2019, I was a Principal and Technical Director of Aurecon.
- 1.3 My qualifications are Masters' degree with Honours and a Post Graduate Diploma in Resources and Environmental Planning from the University of Waikato. I am a full member of the New Zealand Planning Institute (NZPI).
- 1.4 I have 28 years' experience working as a Local Authority and Consultant Planner. My predominant experience has been in the area of plan policy development and land use planning. I have prepared numerous Private and Council Plan Changes. I have provided planning evidence and advice in relation to a number of second-generation District Plans, including those for the Taupo, Tauranga, Rotorua, Thames-Coromandel, Western Bay of Plenty and Waikato Districts as well as the Auckland Unitary Plan. I was heavily involved in Council hearings and subsequent appeal processes for a number of these Plans.
- 1.5 I have been involved in the original SmartGrowth Strategy prepared in 2001 and subsequent updates to the Strategy. I have also been involved in a range of Regional Policy (RPS) changes including Change No.4 acting for Tauriko Property Group and more recently Change No. 6 (incorporating changes under the Resource Management (Enabling Housing Supply and other matters) Amendment Act 2021). I have also been involved in District Council hearings on the Intensification Planning Instrument plan changes (IPI's) across the subregion.
- 1.6 I am familiar with the site, and the Papamoa/Wairakei planning context, having been directly involved with the following:
- Plan Change 44 (Wairakei Urban Growth Area) and associated Comprehensive Stormwater Consents
  - Zariba Special Housing Area
  - Palm Springs Development (Hawridge Developments)
  - The Best Block (a joint development between Bluehaven and Hawridge Developments)
  - Papamoa Junction
  - Summerset Retirement Village
  - Waitaha/Karaka Pines Retirement Village

- Brunning and Hurst Plan Change to TCC & WBOPDC (Tara Road and Parton Road).

1.7 This statement is provided in support of the submission made by Bell Road Limited Partnership, which seeks to incorporate 364ha of rural zoned land within the SmartGrowth Strategy as a priority Development Area (PDA) for urban development. Known as Wairakei South, the proposal is a mix of employment and residential land as set out in detail in the Statement of Evidence prepared by Nathan York.

## 2. Background

2.1 I do not intend to repeat the current housing and business shortfall currently being experienced in the subregion, as the Panel will be well aware of this. This is set out in detail in the Housing and Business Capacity Assessment summary included as part of the Draft Strategy. I note however, that the existing housing and business land shortfalls are concerning and are unresolved in the short, medium and long term, and are such that I believe a reset is required particularly in terms of identifying and establishing further Priority Development Areas (PDA's) within the SmartGrowth Strategy. In particular, I refer to those opportunities, which are not Local Authority led, and which are private initiatives.

Commented [NY1]: Which Council are you referring to?

2.2 None of the current areas identified as PDA's are private initiatives anticipated to occur by way of private plan changes. In my opinion, for too long, growth in the subregion has relied upon the following:

1. Historically zoned land, the final areas of which are currently undergoing development.
2. A small number of future urban growth areas, a number of which have significant constraints/infrastructure issues which required resolution before housing or employment land can be released.

2.3 Council initiated plan changes which have not eventuated and/or which have taken too long to produce outcomes. As an example, I am not aware on any significant TCC plan changes in the last 10 years which have resulted in further urban zoning at scale.

2.4 Although through the IPI process, both Tauranga City and Western Bay of Plenty District Councils have incorporated Medium Density Residential Zones (MDRZ), these will provide for minor relief through intensification. I do not foresee significant growth capacity via residential intensification in the short or medium term.

### 3. **Wairakei South**

- 3.1 The Partners in the Bell Road site have been working for some time in investigating and reporting on the land which is located at Wairakei South with a view to proceeding with a future plan change. This includes flood modelling, stormwater and landform, access to the TEL interchange, contamination assessment, geotechnical reporting, ground water monitoring and hydrological assessment.
- 3.2 As set out in the evidence of Nathan York, the site is feasible for development from a financial perspective largely due to the low cost of the land. As Mr York identifies, the per ha cost of the land is significantly less (around only 10% of the bare land cost of plantable kiwifruit land further to the east).
- 3.3 Before a Plan Change can occur, the Wairakei South site needs to be incorporated as a PDA in order to proceed forward under new RPS provisions (which generally reflect those in the NPS-UD) via a plan change process.
- 3.4 The site attributes identified as outstanding issues, in the background documents produced for the draft SmartGrowth Strategy relate to the need for a stormwater and flooding solution for the site and the ability to address Natural Hazards (flooding and tsunami risk) so that there is a low risk.

### 4. **Current Reporting**

- 4.1 The land was considered for employment use within the Aurecon Assessment<sup>1</sup>. The site scored highly within the Assessment and its attributes are set out in detail on pages 8 and 9 of the Bell Road Limited Partnership's submission. The evidence of Nathan York also considers the report in detail. The Aurecon Assessment identifies that the combined area along the Eastern Link and taking in Domain Road, Tara Road and Bell Road was selected with the intent to identify and recommend the more suitable areas within this larger combined area for industrial land development. The report notes "*it is located centrally and has attractive transport and other connectivity benefits; however some significant land, quality and capability constraints are evident including the proximity to the coast with potential flooding and coastal inundation risks*".<sup>2</sup>
- 4.2 The Aurecon Assessment notes that the site is zoned rural with a large proportion of the site being subject to a flooding overlay, is intersected by the East Coast Main Trunk railway and fits strategically within the identified freight routes, the existing SmartGrowth growth cells, and the Te Puke Growth Area

---

<sup>1</sup> Aurecon Industrial Land Study Technical Report, Tauranga City Council – SmartGrowth, Reference P522954 Revision 4, dated 30<sup>th</sup> June 2023.

<sup>2</sup> Page 29, Aurecon Industrial Land Study Technical Report, Tauranga City Council – SmartGrowth, Reference P522954 Revision 4, dated 30<sup>th</sup> June 2023

of the UFTI Report.<sup>3</sup> The report concludes that the most obvious development focus would be on the western land parcels adjacent to the TEL (State Highway 2) and Papamoa (Domain Road Interchange), providing easy access and connectivity to priority freight routes and public transport and is better quality land in terms of flooding and geotechnical constraints. I note that this is the area which is the focus of the Bell Road LP's submission. The report notes that while the site holds potential of 600+ hectares this would carry significant investigation, design and development costs due to its geotechnical complexity.

- 4.3 I note that the Industrial Land Study "Supplementary Report" prepared by Phizacklea Consulting is contrary to the Aurecon Report by identifying that *"the short listed areas identified in the Aurecon Technical Report be included in the Draft Strategy for consultation and that feedback through the submission process will inform the final decisions on the future locations of business land and would be considered alongside further investigation work of the three preferred areas and any further proposals made through submissions to the Draft Strategy 2023 e.g. for the Bell Road/Otawa area"*.<sup>4</sup>
- 4.4 The site is excluded from the Phizacklea Report which notes *"there are significant flooding and stormwater issues to address, and that Bluehaven Holdings are investigation potential urban development including industrial land near Bell Road (Otawa 1 site). SmartGrowth is to consider the outcome of the Bluehaven Holdings Ltd investigations when available"*.<sup>5</sup>
- 4.5 Both the Aurecon Assessment and the Phizacklea Report indicate a need for further geotechnical, stormwater and natural hazard assessments to be provided in support of including the Wairakei South area (incorrectly referred to as Ottawa 1 within the two reports) within the SmartGrowth Strategy.
- 4.6 These technical matters raised, are addressed in the evidence prepared by Ben O'Loughlin and Peter Moodie and are further commented on in terms of the sites planning merits, below.

## 5. Consistency with the RPS

- 5.1 In terms of Plan Change No 6 to the RPS, the proposal is consistent with the Urban Growth Management Policies in the Urban Growth Chapter. In particular:
1. The proposal is master planned by way of a detailed structure plan. (UG Method 18 & UG 7A).

---

<sup>3</sup> Page 51, Aurecon Industrial Land Study Technical Report, Tauranga City Council – SmartGrowth, Reference P522954 Revision 4, dated 30<sup>th</sup> June 2023

<sup>4</sup> Page 2, Industrial Land Study Supplementary Report, prepared by Phizacklea Consulting, dated May 2023.

<sup>5</sup> Page 14, Industrial Land Study Supplementary Report, prepared by Phizacklea Consulting, dated May 2023.

2. The development area is of a large enough scale to contribute towards Housing Bottom Lines. (UG 7A (a))
3. The site offers good accessibility. (UG 7A (d))
4. There are benefits of funding and delivery of infrastructure (developer led) (UG 7A (f)).
5. The site is well connected to transport corridors. (UG 13B & UG 7A).
6. Prior to "live zoning" the effects of climate change and natural hazards (including a risk assessment) are able to be provided. (UG7A)
7. The site is in close proximity to Centres (including The Sands) & employment. (UG 13B & U6)

## 6. **Planning Merits**

- 6.1 In order for the site to be included in the SmartGrowth Strategy as a future development area under the Future Development Strategy (FDS) it is important to consider the relevant merits of the site. The evidence prepared by Ben O'Loughlin (Ground Engineering and Hazards) and Peter Moodie (Stormwater and General Infrastructure) lead me to conclude that there are no ground engineering, stormwater, natural hazard or infrastructure constraints that cannot be addressed at the time of rezoning through a plan change for the land. In particular, and based on the engineering evidence, the RL of the site can be practically filled and raised above the flood level and from a geotechnical perspective the land will be suitable for urban development, thus avoiding flooding and tsunami risk.
- 6.2 Peter Moodie has confirmed that there is a stormwater solution for the site (modelling has occurred taking into account Climate Change factors) and this solution is largely dependent on the extent of land which needs to be used for stormwater management. I see the stormwater management area as a significant benefit of the proposal given that 99% of the wetlands in the catchment have been drained and converted to farmland. Not only does an extensive wetland provide a stormwater solution for Wairakei South, but it provides significant cultural and ecological benefits, from wetland outcomes at scale. This is entirely consistent with Te Mana O Te Wai, and the National Policy Statement for Freshwater Management and its supporting Regulations.
- 6.3 As identified by Nathan York, the raw cost of the land is such that a significant area can be utilised for stormwater management without affecting the feasibility of the ability to develop the land for urban purposes. Feasibility analysis has been completed by the applicant. Their assessment is that based on bare land price and development costs, the finished landform can be delivered for approximately \$1.3m per hectare.

- 6.4 Although the land is subject to filling and preloading, there is the ability to win large volumes of sand material from the site itself and significant volumes of suitable fill material also exists in close proximity to the site. There are a number of innovative and efficient options to achieve this.
- 6.5 The site entirely aligns with the corridor approach and can be accessed and serviced efficiently from the TEL. There is even an existing underpass to provide for services connections. There is also a link to Te Puke. As set out in the work completed by Transportation specialists Mott McDonald (annexed to the evidence of Nathan York), the land is able to be easily accessed from the existing TEL interchange through the simple addition of further upgrades.
- 6.6 The land is supported by the Aurecon Assessment with an overall weighted score of 7.4125. Based on the Aurecon Assessment the site is one of the highest scoring in terms of its attributes. For unknown reasons the site was excluded from the Phizacklea Assessment in being identified as a preferred area.
- 6.7 The site is a natural extension to the existing Wairakei Urban Area and has the advantage of being not only close to Tauranga geographically, but close to the existing Wairakei Town Centre (The Sands), employment zones and amenities such as Papamoa Beach, entirely consistent with the connected Centres approach under UFTI.
- 6.8 Unlike other urban growth options, the site contains no significant identified landscape features, ecological features, archaeological sites, wetlands, or natural waterways which may constrain development or restrict feasibility.
- 6.9 The land is not highly versatile land given constraints such as its low-lying nature and peat soils. The land has limited potential as arable land for cropping or orcharding. Through the NPS for Highly Productive Land, the site will need to be identified under policy 3.6 which provides for urban rezoning of highly productive land if urban rezoning is required to provide sufficient development capacity to meet demand for housing or business land to give effect to the National Policy Statement on Urban Development 2020. The site is also able to be identified in the HBA which is also a criteria. I support this as the site is less versatile in terms of its productive potential than much of the land further to the east (such as around Paengaroa) which is suitable for horticulture, ie Kiwifruit.
- 6.10 Due to the site's proximity to existing infrastructure, a relatively short timeframe for the delivery of land will apply. I anticipate that a Plan Change process for the land would take around 2 years. On this basis the site can deliver urban land within the short-term planning horizon.

6.11 In my view the site should also be included in the final Housing and Business Capacity Assessment. At this stage the assessment is only in a summary format document.

6.12 The residential growth allocations and the business and employment land demand table in the Draft Strategy should also be updated to incorporate the site along with Maps 18 and 19 of the Strategy.

## 7. **Conclusions**

7.1 Based on the evidence of Peter Moodie and Ben O'Loughlin, I am satisfied that natural hazard, flooding, and geotechnical constraints associated with the site can be appropriately managed through relatively standard engineering responses to the site. As identified in the evidence of Ben O'Loughlin, development of the land can occur in accordance with accepted engineering solutions and filling will enable the land to be above the 100-year flood level and clear of any Tsunami risk.

7.2 The evidence engineering and natural hazards evidence addresses the two outstanding points that were raised in the Phizacklea Report, which indicated that the submitter would need to provide in support of the site being included as a Priority Development Area in the SmartGrowth Strategy.

7.3 Although large areas are required to be set aside for stormwater management, I consider that this is a significant positive benefit of developing Wairakei South given that 99% of the wetlands within the Kaituna Catchment have been lost as a result of being drained and converted into farms. This is entirely consistent with Te Mana O Te Wai.

7.4 The sites attributes such as its proximity to the eastern corridor, the ability to gain access via the existing interchange, its connection to Te Puke and the TEL and the fact that it is a logical extension to the existing Wairakei settlement are all in my view positive reasons to include the site as an identified future development area. As noted in the evidence of Nathan York, one particular advantage of the site is the proven feasibility of being able to develop the site, given the low cost of the land. The feasibility of other land identified in the Strategy is questionable.

7.5 In my opinion, the inclusion of the land within the SmartGrowth Strategy as a future development area will further assist the subregion in achieving both residential and business land shortfalls which are not being met in either the short, medium or long-term scenarios.



- 7.6 Overall, I do not see any valid planning reasons for excluding the site from the Strategy. I consider that the site should also be incorporated as a priority development area in the Strategy.
- 7.7 I would be happy to answer any questions the Panel may have.



Aaron Collier  
Planner  
23 November 2023