

## Supplementary Submission by Sustainable BoP Trust on SmartGrowth Strategy 2023-53

This supplementary submission follows further information being provided by the SmartGrowth team in response to questions raised by ourselves and other ex-Forum members. This, along with our initial submission, is also supported by the following:

- Beth Bowden
- Carole Gordon
- John Garwood
- Julian Fitter (Chair, Bay Conservation Alliance)
- Julie Andrews
- NCW Tauranga
- Paul Hickson
- Te Puke EDG

### Summary

In this supplementary submission, we briefly address a few important additional issues that, it is now clear, have not been adequately addressed:

- 1) The clash of narratives / strategies between SmartGrowth and Tauranga City Council
- 2) Sub-regional leadership seemingly disconnected from the views of many local communities
- 3) The reality that this Strategy contains no framework to significantly cut carbon emissions
- 4) Ongoing lack of clarity regarding our transport plan – especially regarding public transport
- 5) Complete lack of any funding plan – despite growth demonstrably not ‘paying for growth’
- 6) The need for better community representation on SmartGrowth
- 7) The increasingly apparent need to urgently and effectively address our polluted airshed/s

### A Key Concern: A Clash of Two Strategies

We wish to highlight two different narratives that are being publicly discussed at the same time. One is articulated in the SmartGrowth Strategy and in discussions with the SmartGrowth team. The other is being presented by TCC Commissioners and others at TCC.

Note the wording below is ours, but the messages have been crystal clear from both sources:

### **1. SmartGrowth Strategy / FDS:**

This is a balanced Strategy that allocates projected growth across the sub-region and provides for about 37,000 new dwellings. It prioritises intensification within existing Tauranga City boundaries, along with 11,000 more dwellings in the Eastern Corridor, 6000 new dwellings in Western Corridor greenfields (including Pyes Pa), just over 1000 in the old Southern Corridor (Ohauti and Welcome Bay), and 4000 in the Northern Corridor. [i.e. growth is distributed across all corridors.]

This will result in more medium-density intensification, along with some (but probably not much) high-density, with significantly more homes in the East to support the growing horticultural sector. Only 5500 dwellings will be built in Tauriko and Keenan Rd and none are planned for Merrick, Joyce, Upper Belk, etc. before 2054.

All SmartGrowth partners have signed up to WK-NZTA's Tauriko Business Case that [in an explicit statement to Sustainable BOP Trust] NZTA states will easily support far more than the 6000 new dwellings that are allocated to the Western Corridor over the next 30 years, without needing to build the proposed 4-lane bypass from Omanawa Rd to The Crossing. That will free up government transport funding for other projects before needing stage 4 of the Tauriko upgrade.

### **2. TCC:**

We can't afford to grow in all directions and keep sprawling. The more we grow in all directions, the more carbon emissions. We need to focus growth in the Western Corridor, as that is where the industrial growth is occurring, and it connects in a direct line down Cameron Rd to the Mount, resulting in 70% of the city's jobs being in that Western-Central corridor.

We have to get NZTA to fast-track the 4-lane bypass from Omanawa Rd to The Crossing, so the 4 stages of the project get built in the 2030s (not the 2040s), or else the SDP won't be able to develop the 25,000 new dwellings in the Western Corridor (including Tauriko West, Keenan Rd, Upper Belk Rd, etc.) that will be developed "over the next 30 years". [Or in the words of Commissioner Tolley 24/8: "30,000 new houses" in the "Kaimai".] It "enables a connected public transport service that reduces carbon" (24/8/23). Upgrading SH29 will "fight climate change" (4/9). The 25,000-30,000 new homes will allow people to live close to the 12,500 jobs in that corridor and result in up to half the people living and working in Tauriko and nearby areas to travel by public transport or active transport (most via Barkes Corner and Cameron Rd).

**Those two narratives are inconsistent. Over the next 30 years, which is actually true?**

Do all the SmartGrowth partners plan to spread growth across the sub-region, with 33%-40% housed within the intensification of existing urban areas and only 15% in Tauriko-Keenan Rd? Or is the actual plan to focus growth in the Western Corridor greenfields, as the Commissioners keep saying, with “25,000 new homes over the next 30 years” in the “Tauriko” SDP area – which means well over half of all new dwellings will be in those Western Corridor greenfields?

Which raises another key question: What is the point of the SmartGrowth Strategy if many people don't believe it? Including, it seems, the Commissioners! Why should anyone believe it, when the Commissioners are contradicting it at public meetings at the same time it is out for consultation?

We support a clear, sustainable strategy that is explicitly agreed to by all partners and supported by a more comprehensive, proactive public consultation process. While based on the current SmartGrowth Strategy, it needs to be a lower carbon and more sustainable plan that explicitly rejects the fast-tracked development of Upper Belk Rd, lower Kaimai, and Merrick Rd over the next 30-50 years. And it needs to include a funding plan to back it up.

That is not currently the case, which results in serious disconnections between the SG Strategy, TCC's LTP (and the desires of many property developers), and the wishes of the general public.

Given TCC's huge investments in Te Papa, urban intensification in the Te Papa area should be a top priority. That requires strong leadership and proactive investment in planned urban redevelopment to deliver mixed development and meet social housing needs.

The Strategy also needs to more explicitly address the increasingly urgent need for more affordable and appropriate housing for elders, in line with our rapidly aging population, and for people with disabilities.

We believe that there is an opportunity in Tauranga and across the Western Bay for communities to help councils to shape more sustainable urban design through co-design processes.

## Disconnected Community Leadership

Recent community discussions undertaken by Sustainable BOP Trust and reports from a number of sub-regional community organisations add to our perception that there is a major disconnection between council plans (often supported by ‘business elites’) and wider community views.

Empirical evidence suggests that Tauranga-WBOP communities have “had enough of growth” and/or want less growth and/or want a different growth model. In our view, they certainly don’t want anyone to ‘add fuel to the fire’ and encourage more growth! Growth will happen, without inducing more demand.

Whereas SmartGrowth partners seem somewhat oblivious to the public view, and still appear determined to follow the same old growth plan, as evidenced by the SG Strategy and FDS – albeit with an increased emphasis on intensification (if we ignore TC’s alternative narrative).

When putting our understanding of public sentiment to SmartGrowth, we received two responses:

- 1) There isn’t clear evidence of that.
- 2) SmartGrowth has no choice, and is doing its best to manage growth and are certainly not encouraging any more growth

To which we respond:

- 1) We can’t afford to get that evidence, but councils can and should run a public survey asking carefully worded questions to ascertain local people’s views on growth and to respond.
- 2) There is still, in late 2023, an explicit council-funded strategy to increase population growth in Tauranga. The evidence is clear, including Priority One’s new “talent attraction platform” [Work Life Tauranga](#), which states: “Make Tauranga Moana your next move.”

Local councils are funding our economic development agency more than ever (nearly \$2 million in 2023-23). Public funding should not be used to support programmes that add pressure to our growth crisis, and the funding should be contestable along with that for the other wellbeings.

We are not suggesting all the growth is caused by agencies in this region. We do, however, suggest that councils and other organisations should stop creating more growth pressure and should instead support a truly sustainable plan. Best practice suggests the ideal plan would end all campaigns or initiatives to add further growth pressure, at least until we start to deal with the socio-economic and environmental problems that growth has already brought to this region.

## **Additional Comments on Carbon Emissions**

BOPRC, TCC and NZTA staff and several private sector consultants have all consistently told us over several years that the Tauriko / Western Corridor developments will result in increased CO2 emissions. This was so well known that an Associate Transport Minister directly asked TCC and BOPRC to prioritise other areas of development and not develop the Tauriko / Western Corridor area to the extent that was planned.

The Tauriko Business Case clearly indicates that the SH29 upgrade will enable significantly more urban development and result in massive increases in traffic volumes, resulting in higher CO2 emissions. Yet three months ago, a TCC Commissioner publicly stated that upgrading State Highway 29 “will fight climate change”.

The current argument from TCC staff to justify the Commissioners’ claims is that the SH29 upgrade and Tauriko development are lower carbon than alternative higher carbon developments that could have been on the table, such as a worse plan for Tauriko, or large greenfield developments further up the Kaimai, or unconstrained sprawl in other parts of the sub-region.

So, they acknowledge, while NZTA, BOPRC, Sustainable BOP, and many others are correct that emissions will increase significantly from the proposed SH29 upgrade and Western Corridor greenfield developments, emissions won’t increase as much compared to a higher carbon plan for this corridor, or compared to worse alternatives that could theoretically have happened elsewhere in the sub-region.

Unfortunately, that is precisely the type of thinking that has resulted in the rather serious impacts of climate change that are now starting to be experienced across the world.

SmartGrowth’s Strategy is not the place for compromise on this fundamentally important issue. The whole point of a strategy is to set the direction – any tradeoffs and compromises should come later.

SmartGrowth should not be proactively planning for a sub-optimal outcome that is slightly better than even worse sub-optimal outcomes. It should be planning for good, low-carbon solutions

## Transport Issues (relating to responses to our questions)

- You state “The Connected Centres and general Strategy approach implicitly provides for the older population.” We see no evidence that is the case.
- You state in regards to public transport, which is a particular interest for our Trust and other stakeholders: “The Strategy includes indicative routes but detail will sit with the RPTP” [Regional Public Transport Plan]. That presents us all with a problem:
  - That plan was completed last year and we were told that the Tauranga-WBOP component would largely be determined by the Transport System Plan (TSP) and especially the Public Transport Business Case.
  - We were then told that the TSP and its Public Transport Plan came under SmartGrowth, so TCC would not consult on the TSP or its PT Plan.
  - SmartGrowth initially said that TCC had consulted on the TSP as part of its Long Term Plan. When it was agreed that did not happen (something that TCC staff again agreed was the case only this week), it said that would be a decision for “the partners”.
  - We were then told that SmartGrowth would not be consulting explicitly on the TSP either, but that it would be consulted on as part of the SmartGrowth Strategy, Future Development Strategy, Spatial Plan ... and transport plan!
  - Now we’re told that the public transport information in the Strategy is it... until a TSP “comms/engagement campaign that will help to communicate its programme”. That doesn’t read like a comprehensive engagement exercise – more a comms campaign.
  - Given the huge emphasis that the partners and particularly TCC have put on public transport as an enabler and a justification for growth, especially in the Western Corridor, it is imperative that the public has an opportunity to respond to a comprehensive public consultation process on Tauranga’s transport plan.
- Many, many people we engage with request that SmartGrowth or BOPRC undertake a Passenger Rail Feasibility Study that is an equivalent to the recently released Ferries Feasibility Study for Tauranga-WBOP. That seems important to rule in or out the role of passenger rail in this sub-region.

## Funding Issues (relating to responses to our questions)

- We asked “Will growth ever pay for growth?” and the response was “We acknowledge this concern and it is top of mind as we move into the implementation phase of the Strategy.”
- We acknowledge the acknowledgment, but suggest that a Strategy that is not tightly interlinked with a funding plan has a fatal flaw. We’ve seen the result of an unfunded strategy in the mid-2000s and again in the mid-late 2010s. (Mayor Webber’s voice still ringing in one’s ears.) Stakeholders and the wider public need to know the funding implications of this Strategy in order to give informed feedback.
- It is possible, and in fact realistic, that some positive aspects of the Strategy might not get funded, resulting in less popular and/or unsustainable aspects being implemented. It is not hard to imagine less intensification than hoped for, resulting in more sprawl than planned. As evidenced by this statement from the SmartGrowth team (11/2023): “If other growth areas signalled in the Strategy aren't able to go ahead as anticipated then we need to look at what other areas can be brought forward within the 30 year timeframe.”
- The new government seems no more likely to fund (as opposed to finance) essential growth infrastructure (3 waters and transport capex) than previous governments.

## Community Representation on SmartGrowth

- We do not support SmartGrowth doing away with stakeholder forums and four wellbeing representation as soon as the plan moves to the implementation phase. That is precisely the most important time for solid community engagement and feedback.
- Hence we repeat our call, for:
  - Reinstatement of community stakeholder forums for each of the wellbeing areas, including adding a Forum for economic wellbeing as well as social and environmental
  - Representation for all four wellbeings on the SLG, SIG and TSP governance group
  - Much greater public consultation on key components of the Strategy, especially the transport plan and economic policy

## **Polluted Airsheds**

As we all know, the polluted airshed at the Mount is a major concern for that community, including local hapu and iwi. As evidenced by recent media reportage, it is also a nationally significant environmental issue.

In response to several people's inquiries about this issue, the SmartGrowth team have told us that "The Strategy is not the place to be dealing with specific and detailed planning issues other than providing a framework for aligning such matters with the Strategy direction."

Irrespective of that, our question is this:

TCC has stated that this issue is outside the scope of the Mount-Arataki Spatial Plan and has also said there are no alternative locations suitable for relocating polluting industry from the Mount, so if the SmartGrowth Strategy is not the place to deal with this specific issue, what is the right place?

Surely the SmartGrowth Strategy is the perfect place to deal with this matter? It allows a sub-region-wide overview of the most suitable location/s for polluting activities over a 30-50 year timeframe. If it cannot find suitable alternative location/s, that raises serious questions about whether those activities should be permitted.

You obviously have to follow due process. However, there are mechanisms that can be employed by councils to ensure safer, healthier and more sustainable outcomes for local communities. At this point, that is not happening and is not even being planned to happen.

Without wishing to allocate blame for the past decisions that led to 13 extra people per year dying in the Mount compared to if they lived in Otumoetai, this does lead us to a very pointed conclusion: Who is prepared to allow 13 more people per year to die as a result of allowing the status quo (or some moderated variation of it) to continue?