

SmartGrowth Strategy 2023–2073
ISSUES AND OPTIONS PAPER
Areas to be Protected and Developed Carefully
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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 important role of the Kaimai range and mamaku forests and 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. 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. 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. In continuing to foster economic growth and development we will need to ensure that natural assets continue to provide the critical resources and environmental benefits on which our well-being relies. iii. Include an additional case study to highlight the role of the Kaimai range and Mamaku plateau forests and the protected status of the Kaimai Mamaku Forest Park which is a taonga, connecting two regions, and important to numerous iwi and hapū, conservation 	

and recreation groups and livelihoods. Outline the importance of maintaining the protected status of areas and of maintaining a healthy and functioning ecosystem.

Advantages

- 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 Range and Mamaku plateau forests 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. The Kaimai range and mamaku plateau forests contain large areas of indigenous forest (in public and private ownership) which have significant soil and water functions as well as biodiversity values.

Disadvantages

- Additional text could be considered unnecessary.

Financial implications

N/A

Other considerations

Issue 2: Constraining development in areas with natural hazard risk

Option 2A: Note the submission and make no changes

Not Recommended

<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. • 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. 	<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.
<p>Financial implications</p>	
<p>N/A</p>	
<p>Other considerations</p>	
<p>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.</p> <p>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.</p>	

Option 2B: (Recommended)

- Provide additional text in Chapter 01 Areas to be protected and developed carefully – ‘Introduction’, after paragraph 6 as follows :
 - i. 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 benefits on which our well-being relies.
- Include an additional case study to highlight the Kaimai Range and Mamaku Forests, which are a taonga, connecting two regions, and important to numerous iwi and hapū, conservation and recreation groups and livelihoods. Outline the importance of maintaining the protected status of areas and 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. The Kaimai range and Mamaku plateau forests contain large areas of indigenous forest (in public and private ownership) which have significant soil and water functions as well as biodiversity values.

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.
- 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 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

(To be completed in the decision-making meeting)

Reason

(To be completed in the decision-making meeting)

Date approved:

Approved by: