SmartGrowth Strategy 2023-2073

ISSUES AND OPTIONS PAPER

Future Development Strategy

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Торіс	Part 4: Future Development Strategy
Issues	 Part 4: Future Development Strategy Oppose Infrastructure Readiness Maps Support for the FDS Population Assumptions Settlement Pattern - Changes to Timing (1) Te Tumu, (2) Tauriko West (3) Keenan Rd Settlement Pattern - Adding Areas: - Wairākei South - Tara Rd Residential growth in the East - Residential growth for Welcome Bay and Upper Ohauiti - Intensification - Staging of Long term Development in the Eastern Corridor and Western Corridor Settlement Pattern - Te Puna and surrounds
	9. 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 Ohauiti, 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 Ohauiti 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.

Issue 2: Infrastructure Readiness

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.

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Option 2A	Status Quo – no changes to infrastructure information in the Strategy:
	Note the submissions and make no changes
Option 2B	Make small changes to 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 and refer to background papers and other
	information.
	Add the following text to footnote 15 (Part 4, FDS , p 152): <i>These transport</i>
	improvements not only enable housing but also business land and
	provide important improvements to a signfiicant freight route and
	connection to the Port of Tauranga.
	Identify actions in the Implementation and Funding Plan to:
	Provide information on growth corridors and the required
	infrastructure using spatial mapping.
	Identify the funding gap for each corridor

Issue 3: Maps

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.

Issue 4: Support for the FDS

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. 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.

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.

Option 5A	No changes to demographics, minor changes to the Strategy
	(recommended):
	Note the submissions and make only minor changes to the Strategy.
	Provide clarity on areas where concerns have been raised. Add the
	following text to Part 1, page 21 (last paragraph): These significant
	demographic changes are having, and will continue to have <u>as they</u>
	<u>evolve</u> , a profound influence on how we plan for our sub-region. <u>The</u>
	SmartGrowth Partners will need to cater for these changes through
	their planning.
	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.
Ontion FD	Make the changes requested around demographics.
Option 5B	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.
	tlement Pattern – Timing: Te Tumu
	changes to settlement pattern staging for Te Tumu to be moved forward,
	porting infrastructure.
Option 6(1)A	Status Quo: Note the submissions and make no changes to move Te Tumu forward:
Option 6(1)B	Move Te Tumu forward. Include the provision infrastructure as
Option 0(1)B	requested by submitters.
Option 6(1)C	Acknowledge ability to move areas forward (recommended):
G [1.5.1. 5 (1.7.5	No changes to the staging as set out in the Strategy but specific text to
	acknowledge that should infrastructure funding be addressed there is
	the potential for areas to be brought forward, and that other
	implementation matters should therefore be advanced where possible.
	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.</i>
	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 Urban Growth Area is a Priority Development Area.
	Tauranga City Council and landowners are progressing a Plan Change
	for the growth area with the aim of it being notified by early 2026.
	To the grown area with the airn of it being nothied by early 2026.

= =	Futureproofing for development includes construction of infrastructure to service the growth area where that infrastructure also provides for growth in the Papamoa and Wairakei areas, and funding for infrastructure initial investigation, consenting, design and land purchase activities. Council, landowners and Central Government are working together to seek to identify and secure the infrastructure funding or other financial arrangements, that will enable the network infrastructure that is required for the growth area to be brought forward and delivered in the 2024-34 LTP period.
,	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
Option 6(2)B	Move Tauriko West forward.
Option 6(2)B	
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 and other matters be addressed there is the potential for areas to be brought forward (see text in 6(1)(c)).
Issue 6(3): Set	tlement 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
Option 6(3)B	Note the submissions and make no changes Move Keenan Rd forward.
	Move Keenan Rd forward.
Option 6(3)B Option 6(3)C	
	Move Keenan Rd forward. Acknowledge ability to move areas forward (recommended):
	Move Keenan Rd forward. 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 (see
Option 6(3)C	Move Keenan Rd forward. 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 (see text in 6(1)(c)).
Option 6(3)C	Move Keenan Rd forward. 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 (see text in 6(1)(c)). Idement Pattern – Additional Areas: Wairākei South
Option 6(3)C Issue 7(1): Sett Request to add	Move Keenan Rd forward. 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 (see text in 6(1)(c)). Element Pattern – Additional Areas: Wairākei South and Wairākei South to the FDS from Bell Rd Ltd Partnership.
Option 6(3)C Issue 7(1): Sett Request to add Note: Link to In	Move Keenan Rd forward. 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 (see text in 6(1)(c)). Idement Pattern – Additional Areas: Wairākei South ad Wairākei South to the FDS from Bell Rd Ltd Partnership. Industrial Land Issues and Options Paper which considers Wairākei
Option 6(3)C Issue 7(1): Sett Request to add Note: Link to It South. The opti	Move Keenan Rd forward. 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 (see text in 6(1)(c)). Element Pattern – Additional Areas: Wairākei South ad Wairākei South to the FDS from Bell Rd Ltd Partnership. Industrial Land Issues and Options Paper which considers Wairākei tions outlined here align with the Industrial Land topic.
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Issue 7(1): Sett Request to add Note: Link to In South. The opt	Move Keenan Rd forward. 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 (see text in 6(1)(c)). Element Pattern – Additional Areas: Wairākei South ad Wairākei South to the FDS from Bell Rd Ltd Partnership. Industrial Land Issues and Options Paper which considers Wairākei stions outlined here align with the Industrial Land topic. Status Quo – Do not identify Wairākei South as a potential long term growth area for residential and/or business land in theFDS (recommended). Make no changes to the strategy to include the additional area.
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Option 6(3)C Issue 7(1): Sett Request to add Note: Link to In South. The option 7(1)A Option 7(1)B	Move Keenan Rd forward. 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 (see text in 6(1)(c)). Element Pattern – Additional Areas: Wairākei South ad Wairākei South to the FDS from Bell Rd Ltd Partnership. Industrial Land Issues and Options Paper which considers Wairākei stions outlined here align with the Industrial Land topic. Status Quo – Do not identify Wairākei South as a potential long term growth area for residential and/or business land in theFDS (recommended). Make no changes to the strategy to include the additional area. Include Area: Identify Wairākei South as a 'Potential long term growth area' in Map 18 of the FDS
Option 6(3)C Issue 7(1): Sett Request to add Note: Link to In South. The option 7(1)A Option 7(1)B	Move Keenan Rd forward. 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 (see text in 6(1)(c)). Element Pattern – Additional Areas: Wairākei South a Wairākei South to the FDS from Bell Rd Ltd Partnership. Industrial Land Issues and Options Paper which considers Wairākei tions outlined here align with the Industrial Land topic. Status Quo – Do not identify Wairākei South as a potential long term growth area for residential and/or business land in theFDS (recommended). Make no changes to the strategy to include the additional area. Include Area: Identify Wairākei South as a 'Potential long term growth area' in Map 18 of the FDS 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
Option 6(3)C Issue 7(1): Sett Request to add Note: Link to In South. The option 7(1)A Option 7(1)B	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 (see text in 6(1)(c)). Idement Pattern – Additional Areas: Wairākei South awirākei South to the FDS from Bell Rd Ltd Partnership. Industrial Land Issues and Options Paper which considers Wairākei tions outlined here align with the Industrial Land topic. Status Quo – Do not identify Wairākei South as a potential long term growth area for residential and/or business land in theFDS (recommended). Make no changes to the strategy to include the additional area. Include Area: Identify Wairākei South as a 'Potential long term growth area' in Map 18 of the FDS 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
Issue 7(1): Sett Request to add Note: Link to In South. The op Option 7(1)A	Move Keenan Rd forward. 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 (see text in 6(1)(c)). Element Pattern – Additional Areas: Wairākei South a Wairākei South to the FDS from Bell Rd Ltd Partnership. Industrial Land Issues and Options Paper which considers Wairākei tions outlined here align with the Industrial Land topic. Status Quo – Do not identify Wairākei South as a potential long term growth area for residential and/or business land in theFDS (recommended). Make no changes to the strategy to include the additional area. Include Area: Identify Wairākei South as a 'Potential long term growth area' in Map 18 of the FDS 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

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 opt	tions 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 theFDS (recommended).
	Make no changes to the strategy to include the additional area.
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) Sett	lement Pattern – Additional Areas: Residential growth in the East
Request for im	mediate residential growth at Paengaroa and Pongakawa. An
assessment of	f Māori land suitable for housing solutions in Maketu and an extension of
coastal settler	ments past Pukehina further east has also been requested to be
explored. Gene	eral requests for development of rural settlements in the East.
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</i>
	development only and does not consider rural development. Further
	housing opportunities are a matter for the councils through private
	plan changes or resource consents.
Option 7(3)B	Change the Settlement Pattern to include the additional areas in the
Орион 7(3)В	East (adding Paengaroa and Pongakawa)
Option 7(3)C	Refer to Implementation and Funding Plan:
Option 7(3)C	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) Sett	tlement Pattern – Additional Areas: Residential growth in Te Puke
	mediate residential growth in the Te Puke township.
Option 7(4)A	Status Quo - Make no changes to the strategy to include further
Option 7(4)A	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
Option 7(4)B	in the Te Puke township.
Issue 7(5) Sett	lement Pattern – Additional Areas: Residential growth for Welcome
Bay and Upper Ohauiti	
Request for the Upper Ohauiti 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 – no changes to include Welcome Bay and Upper Ohauiti
(2).1	(recommended)

	Make no changes to the strategy to include the additional areas. Note the amendments recommended in Option 7(3)A.
Option 7(5)B	Include the Welcome Bay and Upper Ohauiti Areas: Change the Settlement Pattern to include the additional areas

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 – 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. 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

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

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.
Option 7(7)B	Option 7(7)B: Provide Greater Clarity around Longer Term Areas
·	(Recommended): Amend the residential allocation table to
	acknowledge that the Eastern Centre / Western Corridor (Upper Belk
	Road) may be needed within the 30 year timeframe.
	Add a combined range of 2,000 - 8,000 houses into the long-term
	residential allocation column for "Eastern Centre / Upper Belk Road.
	Delete Eastern Centre 800 Dwellings Long Term from the table as it is
	included above.
	Add a 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.
	Add the wider Western Corridor to this map as a potential 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)

Option 7(7)C	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
Issue 8: Te Pu	na 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	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, and note that the scope of the future spatial plan
	will be determined with community and tangata whenua input. Clarify
	the terminology around 'potential long-term growth area' and long-
	term growth areas.
Option 8B	Remove Te Puna as a potential long-term growth area:

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.

Remove Te Puna as a 'potential long-term' growth area in the strategy.

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: Local
	authorities must have regard to the FDS when preparing or changing RMA planning documents, including through private plan changes; and all agencies managing growth are 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.
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/639c0b75c3lac6442f8d9994/6570d7ld543ld0853240f315 SmartGrowth%20Industrial%20Iand%20Study%20Further%20Information%20Report%20Oct%2023.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.

Add the following text to footnote 15 (Part 4, FDS, p 152): These transport improvements not only enable housing but also business land and provide important improvements to a significant freight route and connection to the Port of Tauranga.

Identify actions in the Implementation and Funding Plan to:

- Provide information on growth corridors and the required infrastructure using spatial mapping.
- Identify the funding gap for each corridor

Advantages

- 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)

Disadvantages

 Matters raised by submitters are not directly addressed in the Strategy and are referred to the Implementation and Funding Plan or other processes

- Addresses specific matters such as the Transpower submission points
- Provides confidence that the strategy has considered key infrastructure matters.

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.

² See SmartGrowth Industrial Land Study - Further Investigations Report, October 2023: <a href="https://assets-global.website-global.websit

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.

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: 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). Add the following text to Part 1, page 21 (last paragraph): These significant demographic changes are having, and will continue to have <u>as they evolve</u>, a profound influence on how we plan for our sub-region. The SmartGrowth Partners will need to cater for these changes through their planning.

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.

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. The minor changes to the strategy proposed provides clear direction for the partners that demographic changes need to be factored into planning.

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

Disadvantages

Demographics

Does not address all 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

 Submitters may be of the view that there is insufficient flexibility built into the Strategy and therefore have ongoing concerns over the FDS. that a responsive approach can be taken (eg through Plan Change 6 to the RPS and future reviews of 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 then 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.

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.

 Provides greater flexibility around the settlement pattern which reduces the need for assessments through the RPS or significant reviews of the FDS

- 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

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 Te Tumu as a growth area

Financial implications

None.

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.

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.

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.

Option 6(1)B: Move Te Tumu forward. Include the provision infrastructure as requested by submitters.

Advantages

- 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

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)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. Kaitiuna 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

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

- 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

Disadvantages

 Misalignment between any plan change brought by Te Tumu and the staging set out in the Strategy

Financial implications

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

- 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

Disadvantages

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

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.

Advantages

- Addresses submitters concerns.
- Signals that the partnership wants development to occur earlier

Disadvantages

- Out of step with the TCC LTP and other infrastructure providers
- Residential allocations out of step with the information provided from TCC

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.

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

- 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.

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.

- 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
- 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.

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

Issue 7(1): Settlement Pattern – Additional Areas: Wairākei South

Request to add Wairākei South to the FDS from Bell Rd Ltd Partnership.

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 FDS(Recommended). Make no changes to the strategy to include the additional area. r

Advantages

- Aligns with evidence-based decisions made around the FDS settlement pattern (including those relating to constraints)
- Acknowledges that the wider catchment is subject to natural hazard risk exacerbated by climate change, with cultural values as set out in the Kaituna River document.
- Identifies that a catchment level approach is required to manage flood risk in the Bell Road catchment, including both downstream and upstream.

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- 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

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Disadvantages

- 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:

- 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 SmartGrowth councils acknowledge that there is work underway by the Bell Road LP to undertake investigations as to the suitability of Wairākei South for urban development purposes. It is anticipated that when this information is provided to the councils, consideration will be given at that time.
- 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 of Wairākei South through the required rezoning process under the RMA.

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.
- 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 Rangiuru (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)

Financial considerations: Financial implications for the relevant council and infrastructure providers if these areas are brought in

Other Considerations: See considerations above.

- 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.

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).

Advantages

- 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

Disadvantages

- 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.

- 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)

 Signals that development could be a possibility in this area where that may not prove to be the case

Financial considerations

None

Other Considerations

- Proposed National Policy Statement for Natural Hazard Decision-making 2023
- Government Policy changes

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- 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 FDS (Recommended). Make no changes to the strategy to include the additional area.

Advantages

- Aligns with evidence-based decisions made around the FDS settlement pattern (including those relating to constraints)
- Acknowledges that the wider catchment is subject to natural hazard risk exacerbated by climate change, with cultural values as set out in the Kaituna River document.
- Identifies that a catchment level approach is required to manage flood risk, including both downstream and upstream.

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

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- 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

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Financial considerations

None

Other Considerations

Wairākei South and Tara Rd have similar constraints relating to flooding, natural hazard risk and geotechnical issues. It is noted that Tara Rd is a much smaller site. 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:

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- 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 SmartGrowth councils acknowledge that there is work underway by the landowners/developers to undertake investigations as to the suitability of Tara South for urban development purposes. It is anticipated that when this information is provided to the councils, consideration will be given at that time.
- 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.
- 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
- 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.

Financial considerations: Financial implications for the relevant council and infrastructure providers if these areas are brought in

Other Considerations: See considerations above.

- 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.

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).

Advantages

- 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 M\u00e4ori 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)

Disadvantages

- 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

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. Further housing opportunities are a matter for the councils through private plan changes or resource consents.

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
- 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)

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

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.

Option 7(3)B: Include Areas: Change the Settlement Pattern to include the additional areas in the East (adding Paengaroa and Pongakawa)

- Potentially addresses the housing shortfall
- Provides a pathway for landowners/developers in these areas

Disadvantages

- 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
- 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

Financial considerations: Financial implications for the relevant council and infrastructure providers if these areas are brought in

Other Considerations:

Private Plan Change 95 (Pencarrow Estate, Pongakawa) is an active plan change with decisions still to be made.

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.

Advantages

- 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

Disadvantages

- 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

Financial considerations

Could have financial implications on the relevant councils and other infrastructure and service providers depending on the outcome of the further work undertaken.

Other Considerations

Private Plan Change 95 (Pencarrow Estate, Pongakawa) is an active plan change with decisions still to be made.

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.

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 Ohauiti

Request for the Upper Ohauiti 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 Ohauiti. Note the changes recommended in Option 7(3)A.

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 Ohauiti 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 Ohauiti
- 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 Ohauiti Planning Study 2020, Tauranga City Council: https://www.tauranga.govt.nz/our-future/enabling-growth/welcome-bay-and-ohauiti-planning-study. The Study found that accommodating medium and high growth housing scenarios would be unfeasible, except in the Upper Ohauiti urban growth area (the part the 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/Ohauiti 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 Ohauiti

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 Ohauiti Planning Study 2020 – with resulting infrastructure and funding implications
- There are significant infrastructure servicing constraints. Selfservicing for three waters is proposed for the Upper Ohauiti 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.

Advantages

- 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).

Disadvantages

- 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)

Financial considerations

None

Other Considerations

- 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.

Option 7(6)B: Increase Intensification: Allow for greater levels of intensification. Provide greater direction in terms of PC33.

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.

Advantages

- 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.

Disadvantages

- 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.

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.

 $^{^{6}}$ Clause 3.13(1)(a)(ii), National Policy Statement on Urban Development 2020 (May 2022)

Western Corridor Specified Development Project (SDP) Assessment 7 – this is a Kāinga Ora led project which is currently underway.

Option 7(7)B: Provide Greater Clarity around Longer Term Areas (Recommended): Amend the residential allocation table to acknowledge that the Eastern Centre / Western Corridor (Upper Belk Road) may be needed within the 30 year timeframe. Add a combined range of 2,000 - 8,000 houses into the long-term residential allocation column for the Eastern Centre / Upper Belk Road. Delete Eastern Centre 800 Dwellings Long Term from the table as it is included above.

Add a 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. Add the wider Western Corridor to this map as a potential 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.

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).

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) Assessment 8 – this is a Kāinga Ora led project which is currently underway.

⁷ https://specified-development-projects-kaingaora.hub.arcgis.com/pages/western-corridor

⁸ https://specified-development-projects-kaingaora.hub.arcgis.com/pages/western-corridor

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 greas 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

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.

⁹ https://assets.website-files.com/639c0b75c31ac6442f8d9994/6500fbcbbdd0554259e3bf98_Urban%20Form%20and%20Centres%20Background%20Paper%20-%20FINAL.pdf

¹⁰ https://specified-development-projects-kaingaora.hub.arcgis.com/pages/western-corridor

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, and note that the scope of the future spatial plan will be determined with community and tangata whenua input. Clarify the terminology around 'potential long-term growth area' and long-term growth areas.

Advantages

- 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.

Disadvantages

• A lack of clarity in the strategy over whether Te Puna should be a long-term growth area or should be left undeveloped.

Financial implications

N/A

Other considerations

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.

Option 8B: Remove Te Puna: Remove Te Puna as a 'potential long-term' growth area in the strategy.

Advantages

- 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.

Disadvantages

- 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.

Financial implications

N/A

Other considerations

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.

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.

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, including through private plan changes; and all agencies managing growth are 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

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.

Add the following text to footnote 15 (Part 4, FDS, p 152): These transport improvements not only enable housing but also business land and provide important improvements to a significant freight route and connection to the Port of Tauranga.

Identify actions in the Implementation and Funding Plan to:

- Provide information on growth corridors and the required infrastructure using spatial mapping.
- Identify the funding gap for each corridor

Issue 5: Population Assumptions

Option 5A: No change to demographics, minor changes to the Strategy:

Note the submissions and make only minor changes to the Strategy. Provide clarity on areas where concerns have been raised. Add the following text to Part 1, page 21 (last paragraph): These significant demographic changes are having, and will continue to have as they evolve, a profound influence on how we plan for our sub-region. The SmartGrowth Partners will need to cater for these changes through their planning.

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.

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

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 priority development areas to be

brought forward, and that other implementation matters should therefore be advanced where possible.

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 Urban Growth Area is a Priority Development Area. Tauranga City Council and landowners are progressing a Plan Change for the growth area with the aim of it being notified by early 2026. Futureproofing for development includes infrastructure to service the growth area where that infrastructure also provides for growth in the Papamoa and Wairakei areas, and funding for infrastructure initial investigation, consenting, design and land purchase activities. Council, landowners and Central Government are working together to identify and secure the infrastructure funding or other financial arrangements that will enable the infrastructure that is required for the growth area to be brought forward and delivered in the 2024–34 LTP period.

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

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.

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. Make no changes to the strategy to include the additional area.

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. Make no changes to the strategy to include the additional area.

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

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 Ohauiti

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: *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.*

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 the Eastern Centre / Western Corridor (Upper Belk) may be needed within the 30 year timeframe. Add a combined range of 2,000 - 8,000 houses into the long-term residential allocation column for the Eastern Centre / Upper Belk Road. Delete Eastern Centre 800 Dwellings Long Term from the table as it is included above.

Add a 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. Add the wider Western Corridor to this map as a potential 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.

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, and note that the scope of the future spatial plan will be determined with community and tangata whenua input. 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, including through private plan changes; and all agencies managing growth are 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.

Add the following text to footnote 15 (Part 4, FDS, p 152):

These transport improvements not only enable housing but also business land and provide important improvements to a significant freight route and connection to the Port of Tauranga.

Identify actions in the Implementation and Funding Plan to:

- Provide information on growth corridors and the required infrastructure using spatial mapping.
- Identify the funding gap for each corridor

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: No changes to demographics, minor changes to the Strategy:

Note the submissions and make only minor changes to the Strategy. Provide clarity on areas where concerns have been raised. Add the following text to Part 1, page 21 (last paragraph): *These significant demographic changes are having, and will continue to have as they evolve, a profound influence on how we plan for our sub-region. The SmartGrowth Partners will need to cater for these changes through their planning.*

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. The minor changes to the strategy proposed provides clear direction for the partners that demographic changes need to be factored into planning.

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 be addressed there is the potential for areas to be brought forward, and that other implementation matters should therefore be advanced where possible..

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 Urban Growth Area is a Priority Development Area. Tauranga City Council and landowners are progressing a Plan Change for the growth area with the aim of it being notified by early 2026. Futureproofing for development includes construction of infrastructure to service the growth area where that infrastructure also provides for growth in the Papamoa and Wairakei areas, and funding for infrastructure initial investigation, consenting, design and land purchase activities. Council, landowners and Central Government are working together to seek to identify and secure

the infrastructure funding or other financial arrangements, that will enable the network infrastructure that is required for the growth area to be brought forward and delivered in the 2024-34 LTP period.

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
- 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

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 (see text in 6(1)(c)).

Reason

- 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

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 (see text in 6(1)(c)).

Reason

- 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

Option 7(1)A: Status Quo – Do not identify Wairākei South as a potential long term growth area for residential and/or business land. Make no changes to the strategy to include the additional area.

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 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

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- 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 SmartGrowth councils acknowledge that there is work underway by the Bell Road LP to undertake investigations as to the suitability of Wairākei South for urban development purposes. It is anticipated that when this information is provided to the councils, consideration will be given at that time.
- 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.

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 FDS. Make no changes to the strategy to include the additional area.

Reason

- Aligns with evidence-based decisions made around the FDS settlement pattern (including those relating to constraints)
- Acknowledges that the wider catchment is subject to natural hazard risk exacerbated by climate change, with cultural values as set out in the Kaituna River document.

Identifies that a catchment level approach is required to manage flood risk, including both downstream and upstream.

- 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

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- 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.
- The SmartGrowth councils acknowledge that there is work underway by the landowners/developers to undertake investigations as to the suitability of Tara South for urban development purposes. It is anticipated that when this information is provided to the councils, consideration will be given at that time.
- 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.
- 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.
- Under this recommendation, work will continue with the Nga Potiki a Tamapahore Trust.

Decision - 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: 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: The FDS relates to urban development only and does not consider rural development. Further housing opportunities are a matter for the councils through private plan changes or resource consents.

Reason

- 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)

Decision – Issue 7(4) Settlement Pattern – Additional Areas: Residential growth in Te Puke

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.

Reason

- 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

Decision - Issue 7(5) Settlement Pattern - Additional Areas: Residential growth for Welcome Bay and Upper Ohauiti

Option 7(5)A: Status Quo – no changes to include Welcome Bay and Upper Ohauiti. Note the amendments recommended in Option 7(3)A.

Reason

- 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 Ohauiti 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 Ohauiti
- 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 the Eastern Centre / Western Corridor (Upper Belk Road) may be needed within the 30 year timeframe. Add a combined range of 2,000 - 8,000 houses into the long-term residential allocation column for "Eastern Centre / Upper Belk Road".

Delete Eastern Centre 800 Dwellings Long Term from the table as it is included above.

Add a 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.

Add the wider Western Corridor to this map as a potential 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)

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, and note that the scope of the future spatial plan will be determined with community and tangata whenua input. 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, including private plan changes; and all agencies managing growth are 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.

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