

FURTHER SUBMISSION

Proposed Plan Change 33 to the Tauranga City Plan

Under Clause 8 of the First Schedule, Resource Management Act 1991

To: Chief Executive Officer
Tauranga City Council
Private Bay 12022
Tauranga 3143

By email: city.plan@tauranga.govt.nz; janine.speedy@tauranga.govt.nz

Further submission by: Urban Task Force for Tauranga (UTF)

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- 1 Urban Task Force for Tauranga (UTF) made a submission (318) on Proposed Plan Change 33 to the Tauranga City Plan.
- 2 UTF is a person that has an interest in Plan Change 33 that is greater than the general public has for the reasons that the submitter lodged an original submission on Plan Change 33 on behalf of its members and UTF also represents an aspect of the public's interest.
- 3 This submission does not relate to trade competition and/or the effects of trade competition.
- 4 UTF wishes to be heard at the hearing in support of their further submission, and if others make a similar submission, UTF will consider presenting a joint case at any hearing.
- 5 The further submission matters raised are detailed in the attached table which identifies the original submitter and the submission points made by UTF.
- 6 A copy of this further submission with be served on the original submitter within 5 working days after it has been served on Council.



Vanessa Hamm
For Urban Task Force for Tauranga
09 December 2022

Further Submission Points

This further submission by UTF is in relation to the original submission of:	The particular parts of the original submission UTF support/oppose are:	Our position on the original submission:	The reason for UTFs support/opposition to the original submission are:	Allow or reject the original submission:	Details of why UTF wish to allow/reject (in full or in part) to indicate the decision you want Council to make
Tauranga City Council (Submission 314)	Submission points 314.14 – 314.16	Support in part	Although not a requirement of the NPS-UD we support the use of a spatial plan as good practice to determine where further intensification and building height should be provided for at Mount Maunganui. The Spatial Plan will enable public participation in the Planning process. The outcomes of the spatial plan should be incorporated into Plan Change 33.	Allow in part	We consider that the submission should be accepted, and that the Council should: <ol style="list-style-type: none"> 1. Put Plan Change 33 on hold to enable the spatial plan to be completed first; 2. Proceed with a variation to Plan Change 33 once the spatial plan is completed (thus opening Plan Change 33 up for further formal submissions based on the outcome of the spatial plan), and hear all submitters collectively; or 3. Run a separate process and formally integrate this into the decision making process somehow.
Tauranga City Council (Submission 314)	Submission points 314.6 – 314.11	Oppose in part	Under the Operative City Plan, retirement villages are provided for as a permitted activity in the residential zone. The proposed amendments do not provide an appropriate enabling planning framework for consideration of retirement villages. In particular, reference to the need to assess relevant zone policies and urban design requirements as applied to independent dwelling units are inappropriate as retirement villages have specific and unique characteristics.	Reject	The proposed amendments are inappropriate for consideration of retirement villages and are not considered to be enabling. Retirement villages should continue to be provided for as a permitted activity as per the current City Plan standards.

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Tauranga City Council (Submission 314)	Submission point 314.13	Oppose	Assessment in relation to residential development relative to the coastal environment has been incorporated in the Operative City Plan to give effect to the NZCPS, as well as outstanding natural features and landscapes. These areas are identified and mapped in the City Plan. It would be inappropriate to impose further provisions without any supporting technical assessment.	Reject	That the submission be rejected on the basis that the existing City Plan provisions identify and manage the coastal environment and outstanding natural features and landscapes and supporting technical analysis would be required to undertake further changes to these provisions. This would include the need for public feedback from landowners affected by such changes and the need for a submission process.
Bay of Plenty Regional Council (Submission 196)	Submission point 196.1	Oppose	Areas subject to natural hazards are already identified in the Tauranga City Plan. These identified areas are appropriate to be included as qualifying criteria. The introduction of further natural hazard exclusion zones beyond those shown on existing City Plan maps must be completed through a process which involves public participation. Any such outcomes can then be incorporated in a future plan change.	Reject	We consider that the submission should be rejected on the basis that the relief proposed has not been through a public submission process and should instead be the subject of a future plan change and submission process.
Bay of Plenty Regional Council (Submission 196)	Submission point 196.7	Oppose	The submission seeks further restrictions on buildings and activities adjacent to areas identified as having high value in the coastal environment. The submission fails to identify where these areas or sites are located and a process by which this further identification and assessment is to occur.	Reject	The conservation zone, existing esplanade reserves, open space zones and areas identified as subject to natural hazards already appropriately manage the effects of the built environment from Tauranga Harbour and the open coast. The additional process and/or methods that are proposed to complete further work are unclear. The public's

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					ability to participate in any such process needs to be ensured
Property Council New Zealand (Submission 199)	Submission points 199.3 and 199.4	Support	The maximum height of 8-storeys within 1.5km of the city centre should be deleted and a more flexible approach to development heights within the 1.5km walkable catchment should be considered to better encourage residential development.	Allow	We consider that the submission should be accepted as the outcomes proposed through the submission give effect to Policy 3 of the NPS-UD.
Property Council New Zealand (Submission 199)	Submission point 199.6	Support	There is no sound planning reason to amend the status of residential activities from a permitted activity status in commercial zones.	Allow	The proposed amendment will not achieve the outcomes sought by Policy 3 of the NPS-UD. Residential activities should continue to be provided for as a permitted activity in commercial zones as per the Operative City Plan. There is no justification for a less enabling activity status.
JWL Investment Trust (Submission 296)	Submission point 296.6	Support	We agree that buildings in the city centre zone should be a permitted activity.	Allow	Buildings in the city centre are subject to existing provisions which are appropriate. The change of activity status under Plan Change 33 is not related to residential intensification. Currently residential intensification is unconstrained within the city centre. UTF are concerned that introducing a resource consent process will result in unnecessary delays, costs and uncertainty contrary to recent initiatives from the Council promoting revitalisation of the City Centre. A permitted activity status

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					should therefore continue to apply to buildings in the city centre zone.
Kainga Ora – Homes and Communities (Submission 350)	Submission point 350.115	Support	Residential activities above ground floor should be provided for as a permitted activity in commercial zones. The proposed change is less enabling than the current City Plan provisions.	Allow	We agree that residential activities should be reinstated as a permitted activity within commercial zones.
Kainga Ora – Homes and Communities (Submission 350)	Submission point 350.5	Support	We agree that a spatial plan for Mount Maunganui is necessary.	Allow	A spatial plan should be completed as soon as possible to be integrated and incorporated into the Plan Change 33 process.