



COLLIER CONSULTANTS LTD

2 July 2021

Tauranga City Council
Private Bay 12022
Tauranga

Attention: Janine Speedy

By email: janine.speedy@tauranga.govt.nz

Dear Janine,

Further Submission on Plan Change 27 – Urban Task Force Tauranga

In accordance with Clause 8 of Schedule 1, of the Resource Management Act 1991 please find enclosed a further submission on Plan Change 27 (Flooding from Intense Rainfall Events) by Urban Task Force Tauranga.

Contact details for the further submission are as follows:

Urban Task Force Tauranga
c/- Collier Consultants Ltd
PO Box 14371
Tauranga Mail Centre
TAURANGA 3143

M: 021 744 707

E: aaron@collierconsultants.co.nz

The submitter is a person who has an interest in the proposal greater than the interest that the general public has, as the submitter lodged an original submission on Plan Change 27 and Urban Task Force Tauranga represents an aspect of the public's interest.

The submitter wishes to be heard at the hearing in support of their further submission, and if others make a similar submission the submitter will consider presenting a joint case at any hearing.

A copy of this further submission will be served on the original submitter within five working days after it is served on Council.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Aaron Collier'.

Aaron Collier
Director/Planner

Encl: Further submission

COLLIER CONSULTANTS LTD

PO Box 14371, Tauranga Mail Centre TAURANGA 3143 | M: 021 744 707

The specific submission(s) on Plan Change 27 that this further submission relates to:						
Name of original submitter	Address of original submitter	Original Submitter number	Original submission point number/s	Support or Oppose	Reason for my support or opposition are:	I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed)
Stuart Hedges and the Hedges Clan Trust	c/- Holland Beckett Law Private Bag 12011 Tauranga 3143 Attention: Laura Neal laura.neal@hobeck.co.nz	81	81.2 – Table 8D.1 Activity status for business activities	Support	Business and industrial activities should have the same activity status as residential activities. This is also inconsistent with Rule 8D.3.5.	We seek amendments to activity table 8D.1 in accordance with the submission.
			81.3 – Rule 12A.5.2 Vesting of overland flow paths	Support	It is inappropriate for major overland flow paths to be vested in TCC without compensation. The correct approach is to manage overland flow paths in the event of subdivision through appropriate design and consent conditions.	We seek that the submission be accepted.
Stratum Consultants Limited	PO Box 13651 Tauranga 3141 Attention: Shae Crossan shae.crossan@stratum.nz	105	105.1 – Purpose, floodplain information	Support	We agree that the location and extent of a number of flood prone areas is incorrectly shown. The purpose needs to acknowledge the information may be incorrect and inaccurate.	We seek that the submission be accepted.
		105	105.2 – Minimum free board requirements	Support	There is inconsistency between the policy and the New Zealand Building Code. The freeboard for habitable buildings should remain at 500mm, only where these habitable buildings are subject to wave action. The freeboard for commercial	We seek that the submission be accepted.

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					buildings subject to wave action should be 300mm.	
		105	105.3 – Section 8D General	Support	We agree that the current provisions do not allow any scope for resource consent requirements to be waived if the flooding on the site is determined to be incorrect though site specific assessment.	We seek further provisions in accordance with this submission which allow for resource consent requirements to be waived if site specific engineering assessment is provided confirming that a site is not floodable.
Wayne Skinner	16 Taylor Road Papamoa Beach wayneskinner@gmail.com	170	170.1 - The existing stormwater infrastructure is not fit for purpose and remediation and upgrading of existing stormwater infrastructure where this is defective is required.	Support	It is important that there is a catchment wide approach to managing stormwater and TCC has a significant to role to play in this regard.	We seek that this submission be accepted.
Allan & Heather Riddell	142 Domain Road, RD7 Te Puke 3187 helen-allan@extra.co.nz	204	204.1 – General	Support	We agree that it would be logical for Tauranga City Council to provide additional outlets along the coastal strip at Papamoa. Further consideration of this is required as part of a catchment wide approach to managing stormwater.	We seek that the submission be accepted and that TCC undertake further investigations on the merit of further discharges to the CMA.
Annabel Davies	44 Harvey Street, Tauranga South 3112	208	208.2 – Ground truthing of flood hazard	Support	We agree that there has been no/limited ground truthing of the flood hazard maps and that	We seek that map overlays be corrected in

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	annabelmdavies@gmail.com				many of the maps are incorrectly identifying land that is susceptible to flood hazard.	accordance with the submission.
		208	208.4 – Lack of alternatives proposed	Support	We agree that there is a lack of alternatives proposed including TCC undertaking a greater role in managing flooding from intense rainfall events through its stormwater network and obligations under the Local Government Act.	We seek that the submission be accepted.
Aotearoa Park Developments Ltd	c/- 4sight Consulting Ltd, PO Box 13077, Tauranga 3141 Attention: Shannon Miles shannonm@4sight.co.nz	211	211.1	Support	Section 3 (page 5-7) of the Section 32 Evaluation Report for Plan Change 27 provides a background and discusses three options that were considered in response to known localised flooding issues. An infrastructure led response from Council was not adopted and the reason for this was the unreasonable financial burden on the community was sighted. We agree that many overland flow paths originate from upstream developments which are outside the control of land owners receiving stormwater. Insufficient analysis of the cost of Plan Change 27 to private land owners has been undertaken as it relates the requirement to accommodate	We seek that the submission be accepted and that the matters raised be addressed by the plan change.

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					<p>these overland flow paths within private property. The subdivision standards and terms in 12A.5.1.5 require that major overland flow paths be vested with Council through a subdivision process. We agree that the analysis undertaken by Council has principally focused on the cost of providing raised building platforms for flood prone areas and has not taken into account the opportunity cost, or the cost of investigating, designing and gaining the necessary resource consents involved in developing sites to accommodate “defacto” Council infrastructure in the form of major overland flow paths.</p>	
		211	211.2 and 211.3 – Identification of flood prone areas, overland flow paths, and floodplains and the accuracy of spatial information.	Support	<p>Council’s proposed use of GIS and maps that are not part of the City Plan, to spatially identify flood prone areas, overland flow paths and floodplains differs from those currently employed by the City Plan where areas subject to known natural hazards are spatially mapped as part of the planning maps which form part of The Plan. The reasons for using GIS and spatial identification of flood prone</p>	<p>We seek that the matters raised in the submission be accepted and addressed by the plan change.</p>

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					<p>areas, overland flow paths and floodplains under Plan Change 27 appears to relate to the Council's ability to update GIS and spatial information without having to go through a Schedule 1 process under the Resource Management Act. We agree that the adoption of this method provides users of the City Plan and land with no certainty, no accessibility to information (there is no Section 32 analysis to substantiate identification and changes to spatial information), nor any useability of this framework for the public. On this basis we do not consider that the use of the GIS and spatial identification of the features will be effective or certain. We also agree that there has been insufficient rigor, checks and balances in place for this spatial information. The plan change fails to define either a procedure for a review, or to define what information would be required for a review (such as a stormwater model). Much of the data and all the methods that have been used to spatial identify overland flow paths are inaccurate.</p>	

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		211	211.4 – Rule 4C.2.2.10	Support	An exemption from Rule 4C.2.2.310 should be provided for activities within flood prone areas where a flood depth less than 300mm occurs where activities are permitted by Rules 8D.2.1 and 8D.3.5.	We seek that the submission be accepted.
		211	211.6 – Non-notification rule	Support	Rule 8D.4.1 should be amended through the removal of reference to “standards and terms”, as there are no standards and terms listed under Rule 8D.4.	We seek that the submission be accepted.
Paul & Ann Gartner Family Trust	80 Twelfth Avenue, Tauranga South 3112 paanga1@outlook.com	218	218.1 – Option B Infrastructure Led Solutions	Support	Option B – Infrastructure Led Solutions (upgrading the existing stormwater network to protect property from damage) is the correct solution in managing rainfall from extreme storm events and that TCC have a significant role to contribute to this as part of their obligations under the Local Government Act.	We seek that the submission be accepted.
David & Christine Napier	9 Margaret Road, Tauranga david.napier@extra.co.nz	222	222.1 – Stormwater modelling errors	Support	We agree that there are errors within the flood modelling which require significant review and correction.	We seek that the submission be accepted.
Bart & Rachael Zame	21 Berescourt Place, Mount Maunganui 3116	224	224.1 – Policies relating to flood prone areas	Support	We agree that Plan Change 27 does not make allowances for	We seek that the submission be accepted

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					existing buildings already on sites and that policies for flood prone areas need to be amended to ensure that they make allowances for reasonable alterations, renovations, and extensions to existing properties.	and that allowances be made for existing buildings.
		224	224.3 – Allowances for replacement/alterations to existing fences and walls	Support	We agree that amendments need to be made to rules to make it clear that replacement/alterations to existing fences and walls are permitted activities.	We seek that the submission be accepted with the suitable amendments.
		224	224.5 – Earthworks	Support	We agree that providing for earthworks above 10m ³ and 300mm as a restricted discretionary activity is unreasonable and does not account for existing development on sites, or provide for redevelopment opportunities of existing sites.	We seek that the rules be amended to provide for more enabling earthworks provisions in accordance with the submission.
		224	224.6 – Mapping	Support	The existing mapping is at a high-level and does not account for individual circumstances of sites. For example, houses, walls and structures which are already built,	We seek that the submission be accepted.

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Keegan Millar	97 Blake Boulevard, Papamoa keeganmillar@gmail.com	225	225.1 – The plan change does not achieve the purpose of the RMA and will be contrary to Part 2 of the Act.	Support	The provisions will not reasonably meet the foreseeable needs of future generations and will not enable the social, economic and cultural wellbeing of the Tauranga community to be met, nor are the provisions the most appropriate means for exercising TCC's functions under the Act.	We seek that the submission be accepted.
		225	225.1 – Avoidance policies	Support	The plan change contains policies and associated rules which avoid rather than manage flood risk or provide for effects to be mitigated.	We seek that the submission be accepted and that the provisions be amended accordingly.
		225	225.3 – Modelling areas	Support	The plan change contains significant and incorrect modelling and mapping of floodable areas and overland flow path areas.	We seek that the submission be accepted.
		225	225.3 – Flood mapping	Support	Overland flow paths are shown throughout the City as being located through buildings and floodable areas are shown on land which is clearly not floodable as it is higher than adjoining land. There is a lack of any peer review process and no process for updating or reviewing the model has been	We seek that the submission be accepted and that further analysis and peer reviews be completed.

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					defined. The mapping has also used outdated survey and Lidar data and does not take into account critical factors such as recent site improvements and subdivisions.	
		225	225.3 – GIS mapping layer	Support	We agree that the mapping layout on the Council's GIS is entirely controlled and managed by TCC, with no clear process for the layer to be managed and controlled. Will also agree that the correct process to identify hazard areas as provided for under the RMA is through the use of planning maps under the Tauranga City Plan.	We seek that following a further review of modelling that planning maps be used as per the 1 st Schedule process.
		225	225.4 – All of catchment approach	Support	We agree that an all of catchment approach to flooding and stormwater solutions is required and that the proposed plan change as notified will instead result in considerable inefficiencies and cost to individual land owners which have not been properly considered.	We seek that the submission be accepted and that an all of catchment approach be adopted to the management of stormwater by TCC.
		225	225.4 – All of catchment approach	Support	We agree that the Council has a core responsibility of providing flood protection and stormwater infrastructure under the Local Government Act and that an all	We seek that the submission be accepted.

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					of catchment approach is required with Council identifying known areas of infrastructure upgrades necessary to mitigate flood hazards. We also agree that it is inappropriate for TCC to define private property as part of the stormwater network.	
		225	225.4 – Burden of cost	Support	We consider that the plan change moves the burden of cost for flood protection to only some of the affected parties, as opposed to spreading the cost across all affected parties or rate payers in general through an all of catchment approach.	We seek that the submission be accepted. Upgrade works required should be appropriately apportioned to those who benefit.
		225	225.14 – Section 32 analysis	Support	We agree that the Section 32 analysis is insufficient. It does not provide information that warrants a change to the existing plan provisions, creates significant costs to the community which have not been properly considered and that the assessment of options is inadequate.	We seek that the submission be accepted.
		225	225.14 – Assessment of options	Support	We consider that the assessment of options associated with the plan change is inadequate.	We seek that the submission be accepted.

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Peter Williams	69 Grace Road, Tauranga South 3112 peter@veros.co.nz	473	473.2 – Modelling accuracy	Support	We agree that there is inaccurate modelling which has been used as the basis for the plan change and that the plan change should not proceed on the basis of the quality of the modelling information.	We seek that the submission be accepted.
		473	473.3 – General - TCC investment in stormwater infrastructure	Support	The plan change identifies that flooding will affect over 30,000 homes in Tauranga which equates to over 50% of the rate payers of the City. Given the scale of the problem we agree that there is huge investment in stormwater infrastructure required and that investment needs to be made by TCC.	We seek that the submission be accepted and that further engineering work be carried out to identify the upgrading of infrastructure.
		473	473.4 – Insurance costs	Support	This submission is correct in that there may be significant immediate additional insurance costs on land owners which has not been considered.	We seek that the submission be accepted and that Council review and report on insurance implications.
		473	473.5 – Plan change analysis on economic affects	Support	We agree that the economic analysis undertaken to support the plan change is narrowly focused (additional costs associated with raising floor levels) and fails to consider other economic costs including mitigation being completed by	We seek that the submission be accepted and that further economic assessment including costs to the community be completed.

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					applicants and/or consent process costs.	
		473	473.6 – Impervious surfaces	Support	We agree that 70% impervious surface across the majority of land in Tauranga is a conservative assumption in the modelling which is causing unrealistic and inaccurate representations.	We seek that the submission be accepted and that modelling takes this into account.
		473	473.7 – Mapping – non-statutory layer	Support	Flood map layers are able to be updated at any time with no process or consultation. We agree that if TCC had confidence in the flood modelling and assumptions then the maps would be a statutory document (i.e. part of the City Plan).	We seek that the submission be accepted and that mapping occurs via a 1 st Schedule process.
Accessible Properties NZ Ltd	Harrison Grierson Consultants Ltd, PO Box 13025, Tauranga h.stronge@harrisingrierson.com	474	474.2 and 474.3 – Section 8D and matters of discretion	Support	We agree that where the flood maps are inaccurate or incorrectly identified properties as subject to a natural hazard, then there should be provision made for an engineering assessment by a suitably qualified engineer to be provided on a property to confirm that the flooding from intense rainfall provisions will not apply.	We seek that the submission be accepted.

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Brian & Gabrielle Askin	7 Thirteenth Avenue, Tauranga 3112 brianaskin@icloud.com	697	697.2 – Minor overland flow paths	Support	Flow paths are shown as going through the middle of existing dwellings, and complying buildings, boundary fences and walls can significantly affect overland flow paths and will do so in literally thousands of properties affected by Plan Change 27. We agree that reference to minor overland flow paths should therefore be deleted as they relate to individual and specific properties under Plan Change 27.	We seek that the submission be accepted and that reference to minor overland flows be deleted from the plan change.
Lysaght Consultants Limited	19 Totara Street, Mount Maunganui Attention: Sam Hurley sam@lysaght.net.nz	776	776.2 – Activity status of additions and new building works under Table 8D.2	Support	We agree that the majority of building work should not be a discretionary activity and that the adverse effects of flooding on buildings and properties are a discrete effect which Council's discretion should be restricted to through a restricted discretionary activity status.	We seek that the submission be accepted.
Priority One, Tauranga	PO Box 13057, Tauranga nigel@priorityone.co.nz	779	779.1 – Development cost and complexity	Support	We agree that development cost and complexity arises from the plan change and that Plan Change 27 will add to the complexity of RMA consenting processes with further adverse impacts on Tauranga housing supply and affordability issues.	We seek that the submission be accepted.

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					We also consider that the plan change is inconsistent with Section 5 and the purpose of the RMA as the plan change policies unnecessarily restrict what activities can take place over extensive areas of the City. A no risk approach may not enable people and communities to provide for their social, economic and cultural wellbeing, and for their health and safety.	
		779	779.3-779.4	Support	The plan change fails to consider the impacts on land valuation and insurance costs.	We seek that the submission be accepted. Impacts on valuation and insurance costs need to be addressed.
		779	779.5	Support	The plan change imposes restrictions on private land owners to vest overland flow paths for public benefits without any consideration of the cost and/or compensation, nor the wider benefits to others in the catchment.	We seek that the submission be accepted.
		779	779.6 – City Plan review	Support	A full review of the City Plan is to be conducted in three years' time. There is a risk of acting now on the basis of insufficient and incorrect information which strongly outweighs the risk of	We seek that the submission be accepted.

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					not acting. We therefore agree that it is an appropriate time to consider flooding from rainfall matters as part of the City Plan review, rather than in isolation. All natural hazard matters should be considered together.	
Bluehaven Group	PO Box 11057, Palm Beach, Papamoa 3151 Attention: Nathan York	810	810.4 – Flood maps	Support	The maps are non-statutory and provide detail based on information held by TCC. Transparent systems and procedures with respect to remodelling and updating maps are required.	We seek that the submission be accepted.
Barrett Homes Ltd	C/- Collier Consultants PO Box 14371, Tauranga Mail Centre, Tauranga 3143	813	813.1, 813.2 and 813.3 – Mapping, 1 st Schedule process, and inaccuracies and errors	Support	The planning response for identifying a mapping hazards is assessment based on sound and complete information including modelling outputs and use of planning maps which is the process provided for under the 1 st Schedule to the RMA. The maps contain significant inaccuracies and errors which undermine the plan change.	We seek that the submission be accepted.
		813	813.4 – Impervious surface controls	Support	The plan change proposes to introduce some impervious surface controls which is a significant change to the City Plan and which should be considered as part of the wider City Plan review. The costs and	We seek that the submission be accepted and that further assessment be undertaken.

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					efficiencies (including frustrating the intensification outcomes promoted by Plan Change 26) had not properly assessed and thought through.	
Classic Developments NZ Limited	C/- Collier Consultants PO Box 14371, Tauranga Mail Centre, Tauranga 3143	814	814.7 – Modelling/non-statutory mapping tools	Support	Non-statutory mapping tools are expressly contrary to the participatory process of the 1 st Schedule provisions in the RMA and the mapping tools are controlled and managed exclusively by TCC with no clear process for the use of these tools, nor an indication as to how the mapping is to be updated and whether this is contestable.	We seek that the mapping be incorporated on to planning maps as required by the 1 st Schedule process in the RMA.
		814	814.7 – Mapping/modelling inaccuracies	Support	There are significant errors and inaccuracies in the mapping which are outlined in Classic's submission in Figures 1 and 2. This confirms that much of the mapping and modelling is inaccurate and incorrect.	We seek that a peer review be completed of the mapping/modelling exercise to ensure that the flood modelling and mapping is technically correct.
		814	814.9 – Impervious surface controls	Support	The Section 32 analysis does not justify the use of impervious surface controls nor does it consider the cost of monitoring and consenting requirements.	We seek that changes to impervious surface controls in the City Plan instead occur as part of the wider City Plan review process.

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JWL Investment Trust	C/- Collier Consultants PO Box 14371, Tauranga Mail Centre, Tauranga 3143	815	815.5 – TCC’s functions and responsibilities	Support	We agree that the Council’s functions and responsibilities under the Local Government Act and other legislation include the management and upgrade of existing stormwater infrastructure. These obligations must include the construction of infrastructure to meet the growth that it seeks to enable through parallel planning processes (including under Plan Change 26). An all of catchment approach is required and the Council has assessed the costs and benefits (and risk for potential flooding) in isolation of comprehensive discharge consents which are in place for Tauranga City and wider stormwater upgrade projects. The absence of this information in the plan change means that the provisions are lop sided and impose significant burden on private land owners without consideration of the obligations imposed on TCC either under the comprehensive consents, or through planned and proposed upgrades of the stormwater network. Such upgrades may in fact act to reduce risks of	We seek that the matters raised in this submission be accepted and that further work be completed by TCC to address the matters raised.

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					flooding through intensive rainfall events.	
Rebecca McKenzie	10 Fasching Lane, Tauranga 3110 dave.bex@extra.co.nz	838	838.2 and 838.5 – Inconsistency with planning framework	Support	We agree that the natural hazards objectives in the RPS include the need to avoid or mitigate flooding from intense rainfall by managing risk for people’s safety and for the protection of property and lifeline opportunities. Instead of managing risk, Plan Change 27 is focused on avoiding any such risk altogether.	We seek that the submission be accepted.
		838	838.6 – Inconsistency with NPS-UD and intensification under Plan Change 26	Support	Plan Change 27 is inconsistent with the NPS-UD. While we agree that Objective 8 of the NPS-UD seeks that urban environments are resilient to the current and future effects of climate change (supported by Policies 1 and 6), Objective 6 also requires that decisions on urban developments that effect urban environments are integrated with infrastructure planning and funding decisions, strategic over the medium and long term and responsive. Plan Change 27 is being promoted alongside Plan Change 26 which seeks to provide substantial intensification outcomes. Plan Change 27	We seek that the submission be accepted.

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					views the issue of flooding risk from intense rainfall in isolation and without regard to planned and/or funded infrastructure upgrades. The outcome would be planning decisions that are neither integrated, strategic nor responsive and would instead make more difficult the task of providing intensification and housing affordability. Ultimately the impact of Plan Change 27 is that it will make intensification and those matters promoted by Plan Change 26 more difficult and costly to achieve.	
		838	838.9 – Modelling issues	Support	There is uncertain or insufficient information to warrant a change based on the modelling which has occurred. Flood prone areas are shown on land that is clearly not floodable and flood modelling ignores recent changes to landform and current information held by TCC.	We seek that the submission be accepted.
		838	838.12 – Consultation and use on non-statutory planning tools	Support	We agree that the approach to consultation and engagement on Plan Change 27 has not allowed sufficient time for potential submitters to test fully methodologies and inputs into the modelling which sits at the	We seek that the matters raised in the submission be accepted.

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					<p>core of the plan change. This is despite the Tauranga City flood risk assessment having been prepared in final form since May 2019. This is an unfair and inequitable outcome which substantially effects TCC's ability to make considered judgements and responsible decisions on Plan Change 27. There is no clear process for modelling to be managed or controlled, nor the process by which records including flood levels and changes to Council's database are managed and upgraded. We consider that the correct process is to use planning maps based on a proper information database and a 1st Schedule process.</p>	
<p>Jeff & Colleen Hextall</p>	<p>15 Churchill Road, Judea, Tauranga 3110 jeff.hextall.eco@gmail.com</p>	<p>843</p>	<p>843.1 – Section 32 analysis adequacy</p>	<p>Support</p>	<p>We agree that the Section 32 analysis is deficient and that it does not carry out a proper evaluation of alternatives, costs and benefits, thus addressing the requirements of the RMA. There are links to technical documents which provide the rationale for the mapping, upon which the interpretation of provisions relies, that are not of an adequate standard. There is also no detailed information</p>	<p>We seek that the submission be accepted and that the plan change be withdrawn until further work is completed.</p>

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					identifying the contributing catchments for flood levels and overland flow paths.	
		843	843.2 – Plan Change mapping disclaimer	Support	We agree that the maps linked to the plan change are not accurate enough to be relied upon for statutory interpretation. The notation also identifies that these maps are non-statutory. The maps also contain a disclaimer which acknowledges and specifies that TCC does not make any representation or give any warranty as to the “accuracy or exhaustiveness of the information provided”. The acknowledgement and disclaimer also specifies that the information included is indicative only and does not purport to be a complete database. TCC also notes in the acknowledgement and disclaimer that they are not liable for any matters arising from reliance upon or use of any information provided.	We seek that the submission be accepted and that provisions relating to flood maps and overland flow paths be removed.
		843	843.2 – Impervious surface coverage of 70%	Support	The model appears to use an assumed city-wide site impervious coverage of 70% and assumes that all properties will be further developed to this level. This approach is highly	We seek that the submission be accepted and a more realistic coverage figure be used

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					flawed and unnecessarily conservative.	based on survey information.
		843	843.4 – Reserving private land for community stormwater purposes.	Support	We support the submission as it identifies that the plan change requires private land to be reserved for community purposes without proper consultation and compensation. We agree that the Council should be investing in Council owned stormwater systems to protect property and that the focus must be on upgrades to Council infrastructure, ensuring roads are properly designed to provide overland flow path functions as occurs in greenfield development.	We seek that the submission be accepted and that appropriate changes be made.
		843	843.6 – Limits on intensification	Support	We agree that the use of the current modelling will severely limit the utilisation of the areas for residential intensification as the plan change relies on theoretical modelling rather than site specific stormwater assessment.	We seek that the submission be accepted and that impacts on intensification be properly assessed.
Parton Road Land Limited	C/- Collier Consultants PO Box 14371, Tauranga Mail Centre, Tauranga 3143	849	849.1 – No risk approach	Support	The policy framework that supports Plan Change 27 calls for a no risk approach to flooding hazards, which will not enable people and communities to provide for their social,	We seek that the submission be accepted with appropriate changes made.

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					economic and cultural wellbeing, and for their health and safety.	
		849	849.3 – Impact on intensification (Plan Change 26)	Support	Plan Change 26 is to provide greater housing capacity given that Tauranga is a Tier 1 Council (with significant housing affordability and supply issues under the NPS-UD). The material the plan change has considered the issue of flood hazard risk from intense rainfall events in isolation of Plan Chang 26 without regard to any planned or funded infrastructure upgrades.	We seek that further work be undertaken to determine the impact on Plan Change 26 and that this submission be accepted
		849	849.4 – Plan change costs/economic assessment	Support	The economic assessment focuses on the cost of construction to comply with freeboard requirements rather than wider costs associated with the plan change.	We seek that the submission be accepted. Further economic assessment is required.
		849	849.6 – All of catchment approach	Support	The assessment and preparation of Plan Change 27 has been undertaken in isolation and disregards an all of catchment approach which includes consideration of existing stormwater discharge consents and TCC's obligations in terms of infrastructure. This means that the provisions are	We seek that the submission be accepted and that an all of catchment approach be taken.

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					heavily lopsided towards imposing burdens on private land owners. TCC have a significant obligation to provide for new and upgraded infrastructure in the mitigation of flood hazards and an all of catchment approach is required.	
Zariba Holdings	C/- Collier Consultants PO Box 14371, Tauranga Mail Centre, Tauranga 3143	850	850.5 – Stormwater solutions for greenfield development	Support	Plan Change 27 ignores the role that private developers play in providing district or area wide stormwater solutions for greenfield development, either through or in combination with existing development contributions levied under TCC's existing development contributions policies. Instead the burden is placed on existing property owners to prove their situation. Often downstream of those greenfield developments in circumstances where any risks to those properties may have already been correctly addressed by solutions achieved further upstream.	We seek that the submission be accepted and "who pays" is reassessed based on specific assessment of catchment upgrades.
		850	850.9 – Risk based approach	Support	The risk based approach under the RPS is tailored to particular circumstances of a given area. This approach appears to be disregarded through the Section 32 analysis on the basis that it	We seek that the submission be accepted. Further Section 32 analysis is required.

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					would be difficult to administer. Detailed analysis of what these difficulties might be has not been provided and modelling has been based on cumulative conservative assumptions. For example, the assumptions that all sites will be developed with up to 70% impervious surfaces and that all pipe stormwater outlets will 50% blocked. The modelling has been rushed and is inaccurate.	
RGB Holdings Ltd	c/- Collier Consultants, PO Box 14371, Tauranga Mail Centre, Tauranga 3143 aaron@collierconsultants. co.nz	864	864.1	Support	We consider that the use of non-statutory planning tools and the existing model outputs are inappropriate.	We seek that the submission be accepted and that appropriate planning response for identifying and mapping hazards is assessment based on a sound and complete information base, correct modelling outputs and the use of planning maps as provided for under the 1 st Schedule of the RMA.
		864	864.2 – Modelling assumptions	Support	We agree that the conservative assumptions incorporated in the model are compounding and inappropriate.	We seek that the submission be accepted.

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		864	864.3 – Flooding through existing buildings	Support	The existing flood modelling shows that overland flow paths run through buildings which is incorrect and not possible as a matter of fact.	We seek that the submission be accepted.