



24 June 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 26 – 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 26 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 an organisation which 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 26 and the Urban Task Force represents an aspect of the public's interest.

The submission does not relate to trade competition or the effects of trade competition. The matters raised are detailed in the attached table which identifies the original submitter and the further submission points.

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 'A. Collier', is positioned below the text 'Yours faithfully'.

Aaron Collier
Director/Planner

Encl: further submission

The specific submission(s) on Plan Change 26 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)
Accessible Properties NZ Ltd	Harrison Grierson Consultants Ltd, PO Box 13025, Tauranga	86	86.6 Retain objective 14A.1.1 as notified	Oppose	Infill intensification and development is unlikely to be compatible with existing landscape character, nor is "planned residential amenity" likely to be consistent with outcomes associated with intensification.	We seek that the submission is rejected.
		86	86.25 – Definitions natural hazards susceptibility	Support	There is a close relationship between Plan Change 26 and 27, with Plan Change 26 containing a definition of natural hazards susceptibility. The suggestion by Accessible Properties is that where Council's GIS contains incorrect information in relation to a property being adversely affected by natural hazards, then an engineering assessment should be submitted which confirms that the property is not adversely affected.	We seek that the submission is accepted, subject to an amendment which refers to "Chartered Professional Engineer".
		86	86.26 – Definition of townhouse	Support	There is currently no definition of a townhouse despite this being referred to throughout Plan Change 26.	We seek that the inclusion of reference to townhouse be incorporated within the definition of terraced housing.

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		86	86.27, 86.28 & 86.29 – Provisions relating to secondary independent dwelling units in suburban residential zones	Support	There is no justification for the removal of secondary independent dwellings units and in the future the secondary dwelling units provide a good solution for dependent relatives and the like to remain living on a residential site.	Accept the submission that the current provisions relating to secondary independent dwelling units be retained.
		86	86.31 – Amend Appendix 14F Te Papa Housing Overlay to include the areas of the Yatton Park area of Merivale	Support	It is unclear why Council has excluded the Merivale area from Plan Change 26.	Include the areas of the Yatton Park and Merivale as identified in the Accessible Properties submission.
		86	86.36 – Retain minimum dwelling sizes in the commercial zone	Support	There is no justification for Council imposing minimum dwelling sized within the commercial zone. Dwelling sizes will be confirmed and provided by the market.	Accept the submission and delete Rule 14D.4.2.2 as notified.
Nikki Harnett	1377D Manawahe Road, RD4, Whakatane, 3194	90	90.1 – Introduction of arbitrary minimum sizes for dwellings	Support	It is important that housing choice is provided and Council are proposing to exclude smaller dwellings which (given the housing crisis) have an important role to play in providing affordable housing.	We seek that the submission be accepted.
Peter & Lisa Williams	69 Grace Road, Tauranga South, Tauranga	91	91.2 – Site coverage	Support	It is appropriate for site coverage in the suburban residential zone to be 65% for sites of 500m ² or greater.	We seek that this submission be accepted.

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Sanderson Group	111 Carmichael Road, Tauranga 3110 Attention: Gary Curtis	96	96.3 – Non-notification rule for comprehensively designed development	Support	The adoption of a non-notification rule for applications for comprehensively designed development will provide certainty of outcomes in relation to development pathways.	We seek that this submission be accepted.
		96	96.5 – Rule 14B.6.29 Insufficient reference is made to the level of assessment required for demonstrating the adequacy of servicing and infrastructure.	Support	There is uncertainty as to the extent of upgrades to infrastructure required.	We seek that this submission be accepted.
Tauranga City Council	Private Bag 12022, Tauranga 3143 Attention: Janine Speedy	101	101.4 – Rule 17A.14.18.4(d) Outdoor living area – residential activities in commercial zones.	Support in part	The current rule requires the outdoor living area to be screened for complete visual privacy which is practically unachievable as outdoor living areas for above ground dwellings cannot be screened from surrounding residential sites.	We seek that the rule be amended to refer to outdoor living areas not having direct line of site to “adjoining” living rooms and outdoor living areas of other independent dwelling units on the site.
		101	101.5 – Definition of duplex dwelling	Support in part	We agree that there is a need to include reference to sharing a common wall within the definition. We note however that there may be some instances where it is appropriate to attach independent units via a carport (where this has a rear wall).	We seek that the definition be amended to refer to “sharing a common wall”, and that this shall include instances where this common wall is within a carport.

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		101	101.8 – Rule 14B.6.26.8 Matters of discretion for comprehensively designed development	Support in part	We support the amendment in part, due to it referring to public spaces. Reference to footpath and road is unnecessary as they form part of “public spaces”.	We seek that the provision be amended to refer to public spaces only.
		101	101.9 – Amendment to Rule 4E.2.5 Acoustic standards for habitable rooms within the Cameron Road corridor	Oppose	The amendment sought requires an acoustic assessment for all buildings within 40m of the Cameron Road carriageway and for noise standards to apply to habitable rooms with ventilating windows open. It is unclear from the section 32 analysis as to whether any residential activities within 40m of the Cameron Road carriageway are likely to comply with the standard proposed, and the standard would also apply to buildings which may be facing away from Cameron Road which are separated by other buildings/walls from Cameron Road.	We seek that the provision be deleted as it is uncertain and unclear and the matter is more appropriately dealt with by the New Zealand Building Code.
Doug Owens	5 Kelston Way, Tauranga	103	103.1-103.16 – Defined catchments infrastructure assessments	Support in part	We support the need for clarity and a definition in relation to the undertaking on an infrastructure assessment which is currently referred to in Plan Change 26 in the context of “catchment”.	We seek that Tauranga City Council undertakes a structure planning exercise for each catchment to determine servicing and infrastructure requirements, and that this assessment forms

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						part of the requirements which need to be considered for residential intensification. The current rules require a piece-meal approach with each developer having to undertake an assessment based on a catchment wide approach. This is inefficient and ineffective in terms of the plan's objectives.
Heritage New Zealand	Lower Northern Office, PO Box 1339, Tauranga 3141 Attention: Carolyn McAlley	105	105.5 – Policy 14A.1.1.5. Policy – site and context.	Oppose	The proposed change is subjective and uncertain and uses terminology such as “does not detract from”.	We seek that the submission be rejected.
		105	105.16 – Advice note in relation to Heritage New Zealand Act 2014.	Oppose	We oppose the amendment sought by Heritage New Zealand as the advice note suggested is unnecessary and repeats matters addressed in existing legislation.	We seek that the submission be rejected.
Lysaght Consultants Limited	19 Totara Street, Mount Maunganui	117	117.4 – Retain the existing secondary independent dwelling unit rules.	Support	We support the retention of the secondary independent dwelling unit rules, as they are a preferred option to provide for dependents and family members where a dwelling unit forms part of the main bulk of the substantial dwelling on a site.	We seek that the submission be accepted.

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		117	117.14 – Allow for residential development above the ground floor as a permitted activity in the commercial zone.	Support	The purpose of the plan change is to enable more residential development (not less). By not providing for residential development in the commercial zone the plan change reduces the opportunity for residential outcomes in the commercial zone including mixed-use development.	We seek that the submission be accepted.
Summerset Group Holdings Ltd	Level 4, 5 Short Street, Newmarket, Auckland Attention: Dayne Swansson	121	121.4 – The existing performance standards for retirement villages are not fit for purpose and appropriate performance standards for retirement villages are required.	Support	The current performance standards are focused on standard residential development and are not fit for purpose for modern retirement villages and rest homes.	That the submission be accepted and that permitted activity standards that are appropriate for retirement villages and rest homes are included in the plan change as set out in the submission.
		121	121.6 – Exclude rest homes and retirement villages from comprehensively designed development	Support	Retirement villages are “captured” by the comprehensively designed development provisions and should be provided for as a permitted activity.	That the submission be accepted and a permitted activity status with appropriate performance standards be included in Plan Change 26 for retirement villages.
Bay of Plenty Regional Council	PO Box 364, Whakatane 3158	122	122.22-122.23 – Amend wording to ensure that low impact urban design and water sensitive urban design is enforceable for new developments and	Oppose in part	We support the principles of low impact and water sensitive design, but the amendments sought are misguided in that they focus on urban intensification. Recent monitoring confirms that	That amendments to the policies relating to low impact and water sensitive design incorporate reference to TCC's roading network.

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			where existing areas are intensified.		most contamination from stormwater runoff is from the city roading network and so any provisions must be reworded to reflect and acknowledge this.	
SmartGrowth Implementation Committee	C/- Ken Tremaine 8 Mistral Place, West Harbour, Auckland 0618 ken@kentremaine.co.nz	123	123.2 – Chapter 2 Issues Overview. Amend the section 2A as well as the Te Papa Spatial Plan and Urban Form and Transport Initiative.	Support in part	Reference is made to the Te Papa Spatial Plan which is supported, as this provides the framework for intensification. Reference is also made to the Urban Form and Transport Initiative. This provision is unnecessary and does not need to be referenced in the plan.	We seek that the Chapter 2 Issues Overview be amended in accordance with our reason.
		123	123.4 – Chapter 14, Objective 14A.1.1.	Support	We agree with the concerns relating to minimising adverse environmental effects of development on amenity and landscape character. Reference to existing amenity and landscape character will hinder the outcomes sought under Plan Chang 26.	We seek that this submission be accepted.
		123	123.5-123.11 – Chapter 14 Residential Policies.	Support	We agree that a more enabling policy framework that focuses on the intent of the plan change is required. A more enabling status for residential development is needed. We agree that requirements to integrate with the existing character of surrounding neighbourhoods (e.g. policy 14A.1.1.5) and the requirements	We seek that this submission be accepted.

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					<p>to respect the privacy and existing onsite amenity of adjacent dwellings are not consistent with the NPUSD, nor the objectives of intensification under the plan change. Many of the policies will act in favour of the “status quo”. Many new policies may be setting the bar too high for medium and high-density residential development.</p> <p>There needs to be a link in policies to the importance of public amenity spaces. Such spaces will help to support and encourage intensification by offsetting any loss of private outdoor space with greater levels of public open space and services.</p>	
		123	123.13 – Chapter 14 Residential Objective 14B.1.1	Support	References to consistency with residential character and amenity planned for the zone may favour the status quo in terms of low-density development outcomes.	We seek that the submission be accepted.
		123	123.14 – Residential Policy 14B.1.1.1	Support	The policy should be reviewed to ensure that the outcomes of the plan change are achieved as the policy is a higher bar for new buildings. Including the need to mitigate adverse impacts of overshadowing, maintaining	We seek that the submission be accepted.

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					sunlight access and privacy onsite will have the effect of undermining the principle intensification outcomes sought by the plan change.	
		123	123.15 – Residential Objective 14B.1.2 and Policy 14B.1.2.1 – site layout and building design.	Support	The objective and policy provide for suburban residential character, characterised by space, private open space and privacy, which is not consistent with the amended purpose of the suburban residential zone to enable intensification and provide for housing choice under the plan change.	We seek that the submission be accepted.
		123	123.21-123.22 – Residential Rules and Assessment Criteria	Support	We agree that rules seeking to implement the plan change are overly complex and onerous and will create unnecessary additional cost. Rules and assessment criteria need to be simplified to encourage intensification. Unnecessary costs on development will occur.	We seek that the submission be accepted.
		123	123.24-123.28 – Residential Objectives and Policies – Chapter 14	Support	References to minimising impacts on adjoining sites and complimenting rather than dominating the urban landscape character of local neighbourhoods may unnecessarily restrict intensification. The policies need reviewing to enable a framework	We seek that the submission be accepted.

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					to exist which achieves a range of housing typologies as an outcome.	
		123	123.29 – Chapter 14D Residential Rules and Assessment Criteria	Support	We generally support the increase in densities proposed, however the maximum height restrictions are unnecessarily complex and may not comply with the intent of the NPS-UD by adopting “minimums”. We also consider that there is review required to the height limits on some sites particularly to those that will be well served by public transport and in commercial centres.	We seek that the submission be accepted.
		123	123.30-123.34 – Non-notification provisions	Support	We support the non-notification approach on the basis that it provides certainty for a consenting pathway and reduces costs.	We seek that the submission be accepted.
Te Tumu Landowners Group	C/- PO Box 13428, Tauranga, 3148 jeff.fletcher@bconn.co.nz	125	125.14 – Restricted discretionary activities, matters of discretion and conditions – infrastructure	Support in part	We agree that if infrastructure is inadequate in those parts of the city where Plan Change 26 applies, then such areas should be identified or included in Plan Change 26. The cost for individual developers to carry out infrastructure assessments is significant and Council has a role to play in this regard. We consider that further provisions are required which acknowledge that	We seek that the submission be accepted in part.

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					Council will provide information in relation to servicing and infrastructure within development catchments to avoid unnecessary costs and process requirements for applicants.	
Bluehaven Group	PO Box 11057, Palm Beach, Papamoa 3151 Attention: Nathan York	127	127.7 – Purposes of the residential zones	Support	We agree with the approach that the need to achieve a quality design is increasingly important as the scale of development increases to ensure high quality living environments.	We seek that the submission be accepted.
		127	127.10-127.17 – Policies – Urban form and intensification	Support	We agree that the policies are “site level” provisions that are inappropriately included in a section of the plan relating to urban form and sustainable management of the residential land resource. The provisions are addressed elsewhere in the plan as identified in the submission.	We seek that the submission be allowed and that the provisions be deleted.
		127	127.29 – Permitted activity status for secondary independent dwelling units	Support	Permitted activity status should be retained for secondary independent dwelling units.	We seek that the provisions relating to secondary independent dwelling units be retained as per Rule 14B.3.13 of the plan as a permitted activity.
		127	127.31 – Building height	Support	We agree the current building height limit of 9m allows for three	We seek that the Council incorporates a building height with a limit of three

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					levels, but with very poor design outcomes.	levels as suggested in the submission with a supporting definition.
		127	127.32 – Rule 14B.3.3 Streetscape	Support	We agree that reducing front boundary setbacks have the potential to increase useable onsite space whilst also achieving higher quality design outcomes.	We seek that the submission be accepted and that greater flexibility for front boundary setbacks to be reduced are incorporated in the City Plan.
		127	127.63 – Commercial zone guidelines	Support	We agree that no guidelines are provided for residential activities in commercial zones.	Provide guidance for residential activities in commercial zones, including illustrated solutions related to relevant City Plan standards.
Property Council New Zealand	Bay of Plenty Branch, natalia@propertynz.co.nz	128	128.6 – Building height	Support in part	We support the need for further consideration to be given to maintaining the 9m building height within the suburban residential zone and would support a 10.5m height limit as suggested (or a 3 level design approach).	We seek that the submission be accepted in part.
		128	128.6 – Urban design panel	Oppose	The submission seeks an Urban Design Panel similar that established for Auckland Council. Our view is that if an Urban Design Assessment/Approved Architect is involved with the	We seek that reference to a list of approved designers be incorporated into the rule framework with an acknowledgement that such designers must have a strong track record

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					design of the building then this panel is not needed.	and level of skills in relation to building design, consistent with Tauranga City Council's Category 1 registration process for Ground Engineers.
		128	128.9 – Infrastructure capacity assessment	Support	We agree that TCC has a role in terms of assessing the capacity of network infrastructure as this will provide certainty around the capacity and availability of infrastructure necessary to service intensification areas.	We seek that the submission be accepted.
		128	128.11 – Residential development in the commercial zone	Oppose	We do not support the change as residential development will not compromise the purpose of commercial zones. The change proposed is a step backwards and is contrary to the intensification and residential enabling framework promoted through both Plan Change 26 and the NPS-UD.	We seek that the submission be rejected and that residential development be provided for a permitted activity within the commercial zone (particularly within those commercial centres identified in the City Plan).
Barrett Homes Ltd	C/- Collier Consultants PO Box 14371, Tauranga Mail Centre, Tauranga 3143	131	131.4-131.11	Support	In the commercial zone the plan framework does not provide for residential activities as a permitted activity in the commercial zone. Commercial zones are well placed to enable the location and development of intensive residential outcomes and the provisions as notified will discourage residential	We seek that the matters raised in the submission be accepted.

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					development and intensification contrary to the purpose of Plan Change 26.	
Classic Developments New Zealand Ltd	C/- Collier Consultants PO Box 14371, Tauranga Mail Centre, Tauranga 3143	132	132.2 – Ensuring that plan rules and unnecessary process do not worsen housing supply and the current affordability crisis in Tauranga	Support	The City Plan framework must provide certainty for investment and must enable intensification within the residential and commercial zones through clear, certain and enabling planning standards.	We seek that the submission be accepted and that provisions are “tested” to ensure that they do not result in unnecessary regulatory process, delays, costs and barriers to restricting planned development outcomes in intensification areas.
		132	132.3 – Building height	Support	We support the amendment that seeks a building height of at least six storeys. A building height of 20m as a restriction should be removed.	We seek that the submission be accepted and that use of the six-storey building height be established as a minimum requirement.
		132	132.8 – Urban design provisions	Support	We agree that the plan change should not repeat and replicate urban design requirements already contained within the New Zealand urban design protocol.	We seek that urban design reference in the plan refer to outcomes in accordance with the NZ urban design protocol and deletion of separate specific urban design requirements which are unnecessarily replicated.

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		132	132.9 – Infrastructure identification/timing and funding	Support	We agree that the success of intensification will be dependent on coordinated and integrated provision of infrastructure. We also agree that the capacity of infrastructure is a matter of discretion and should not be one which is needing to be investigated and assessed by individual developers on a case by case basis as this is inefficient.	We seek that the submission be accepted and that amendments be incorporated into the plan to require a more coordinated and integrated approach to infrastructure provision with Tauranga City Council having a significant role to play in this regard.
		132	132.14-132.23 – Residential purpose and supporting objectives and policies relating to character, amenity, compatibility and built form.	Support	There are a number of references made in the plan change with respect to integration with existing character, compatibility with planned urban built form and residential character, planned residential amenity, and landscape character matters which are unlikely to be consistent with the outcomes associated with intensification under the plan change.	We seek that the matters raised in the submission be accepted.
		132	132.34 – Residential rules assessment criteria, and associated Appendix maps.	Support	We agree that the rules to implement the policy framework are overly complex and onerous and that they require review and amendment with the aim of simplifying to encourage intensification outcomes.	We seek that the rules are amended and reviewed, including through the provision of controlled activity provisions for comprehensively designed outcomes to

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						ensure a more certain development pathway.
		132	132.35-132.41 – Commercial zone provisions	Support	Further enabling provisions are required for the commercial zone to encourage and promote residential outcomes. This includes the need to utilise public open space and amenities associated with commercial centres. Residential activities should also be provided for as a permitted activity and building heights are unnecessarily restrictive.	We seek that the matters raised in this submission be accepted, with specific provisions incorporated to provide for residential activities, amendments to height provisions, and acceptance that amenity can be provided through commercial centres themselves (i.e. open space and activities).
JWL Investment Trust	C/- Collier Consultants PO Box 14371, Tauranga Mail Centre, Tauranga 3143	133	133.1 – Planned provisions general	Support	We agree that plan provisions supporting the Council's intensification plans must be enabling, certain and flexible enough to promote diverse, creative and wide-ranging housing outcomes.	We seek that plan provisions be "tested" to ensure the outcomes noted in the submission.
		133	133.3-133.11 – Commercial zone provisions	Support	We agree that the commercial zone has a significant role to play in terms of its function in including both commercial and residential activities. More enabling provisions are required to be incorporated into Plan Change 26 in relation to residential activities as sought in the submission.	We seek that the matters raised in the submission be appropriately addressed through changes to the plan provisions to better provide for residential activity outcomes in commercial centres.

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Mitre 10 Limited	c/- Aurecon NZ, PO Box 2292, Tauranga 3140 Attention: Mark Allan mark.allan@aurecon group.com	143	143.2 – Natural hazard susceptibility	Support	A comprehensive and wider review of natural hazard risk mitigation measures should be undertaken by TCC to properly consider the issues surrounding natural hazards and the impact on residential intensification. This should not occur on an adhoc “site by site”, “developer by developer” basis.	We seek a wider review of natural hazard risk mitigation measures takes place as part of Plan Change 26, which is led by Tauranga City Council.
Roman Healthcare Ltd	c/- Natalie Amos, Chapman Tripp, PO Box 2206, Auckland Natalie.amos@chapman tripp.com	149	149.31-149.35 – Potential activities in commercial zones	Support	We agree that the plan provisions should specifically recognise and provide for residential activities in commercial zones, along with an enabling policy framework which supports this approach.	We seek that amendments to the plan be made which incorporate the suggestions as outlined in the submission.
Ngai Tamarawaho	PO Box 141, Coromandel 3546	156	156.1	Support	We agree that extensive and complicated plan provisions which provide uncertain outcomes will not lead to the delivery of intensification.	We seek that plan provisions be tested to ensure that they are not complicated and create uncertainty for investment.
		156	156.2 – Transportation and infrastructure provision	Support	We agree that there is a need for transportation and infrastructure provision to be provided in tandem with development and that an integrated approach is required. It is not efficient to assess potential infrastructure upgrades in a case-by-case basis (i.e. as required by Rule	We seek that the submission be accepted with appropriate changes to reflect the matters raised.

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					16B.6.27). We also agree that a clear indication of what infrastructure is required to be upgraded, the timing of upgrades and the funding of upgrades is needed, and that TCC have a significant role in providing and planning for infrastructure through a Structure Plan and Development Contributions approach.	
		156	156.5-156.6 – Commercial centres/hubs	Support	We agree that the plan promotes centres as having a strong role in the community and that the current Plan Change 26 provisions do not contain objectives and policies that encourage residential intensification in and near centres as required by changes to the NPS-UD. There should be no density limitations in terms of residential development in commercial centres, as centres have the potential over time to evolve to become vibrant mixed-use areas, as set out in the submission.	We seek that amendments be incorporated in Plan Change 26 which addresses the matters raised in the Ngai Tamarawaho submission.
		156	156.9 – Enabling status	Support	We agree that further work is required to streamline the plan rules and assessment criteria. In particular the use of permitted and controlled activity status with	We seek that the matters raised in the submission be reflected through amendments to the plan change regarding the use

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					appropriate assessment criteria is necessary as it provides more certain outcomes in terms of intensification.	of permitted and controlled activity status, with appropriate assessment criteria, as set out in the submission.
Kāinga Ora	Kāinga Ora – Homes and Communities PO Box 74598, Greenlane, Central Auckland 1546 Attention: Brendon Liggett developmentplanning@kāingaora.govt.nz	157	157.1-157.117 – Plan definitions, amendments to Chapter 12 – Subdivision, amendments to Chapter 14 – Residential, amendments to Chapter 17 – Commercial	Support in part	Kāinga Ora have submitted an extensive submission (effectively on the entire plan change which their submission seeks to redraft). The general direction of the Kāinga Ora submission is focused on enabling and delivering quality urban development and accelerating the planning process to deliver housing. This approach is strongly supported by UTF. In general, the enabling provisions proposed by Kāinga will give effect to the NPS-UD. Kāinga Ora have sought a zone approach (effectively requiring the Council to redraft the zone provisions in their entirety) rather than supporting an overlay approach as proposed by Tauranga City Council. In the context of Plan Change 26 the overlay approach is supported although the Kāinga Ora approach of redrafting entire chapters of the plan should be considered as part of the upcoming City Plan review. The redrafting of zone provisions has implications for matters such as	We seek that the submission be allowed subject to amendments as set out in our reasons for this submission.

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					<p>on non-residential activities within the various zones, their status, performance standards which apply to them, and any accompanying assessment criteria.</p> <p>UTF currently prefer the overlay approach as this will enable Plan Change 26 to be adopted and implemented quickly, thus avoiding a prolonged planning process and delays.</p> <p>UTF particularly support matters raised in the submission in relation to amendments to density, building height, setbacks, overshadowing, and site coverage. In relation to comprehensively designed development, UTF are concerned that a some of the assessment criteria proposed under Rule 14B.6.26.1 (Submission Point 157.104) are subjective and uncertain as restricted discretionary activity criteria and could be better refined to provide certainty of outcomes. For example, reference to objectives and policies, and enhancement of urban residential character and amenity need further consideration. We also consider that in terms of Submission Point</p>	

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)
					157.149 regarding consideration of adequate capacity in terms of infrastructure, that TCC has a greater role to play in this regard. UTF support TCC identifying where adequate capacity is available as part of infrastructure assessments necessary for the development of catchments, and if needed, the development of Structure Plans and Development Contribution funding for infrastructure upgrades.	
Veros Property Services	PO Box 324, Tauranga 3110 Attention: Morgan Jones morganj@veros.co.nz	172	172.2 – Building height	Support	We support the analysis contained in the submission which proves that additional building height is required to achieve six level residential development within the Plan Change 26 area.	We seek that the matters raised in the submission be accepted and that building height be based on a minimum of a number of levels rather than a specific building height. A supporting definition will be required