

SUBMISSION ON VARIATION 1 TO PLAN CHANGE 33 TO THE TAURANGA CITY PLAN

TO: Tauranga City Council

SUBMISSION ON: Variation 1 to Plan Change 33 to the Tauranga City Plan (Enabling Housing Supply)

SUBMITTER: URBAN TASKFORCE FOR TAURANGA (“**UTF**”)

C/: Collier Consultants
PO Box 14371
Tauranga Mail Centre
Tauranga 3143
Attention: Aaron Collier

Scope of submission

1. The matters in Variation 1 to Plan Change 33 (**Variation 1**) that this submission relates to, are as set out in the submission below.

Nature of submission

2. The nature of our submission is that the UTF supports Variation 1 with some minor amendments/deletions to address matters raised in our submission. These amendments/deletions are necessary to ensure that the plan change is sufficiently enabling to give effect to the NPS-UD and to avoid any conflict with existing City Plan provisions or unnecessary & uncertain process.

Reasons for submission

3. The Urban Task Force for Tauranga (“**UTF**”) is incorporated as a Society with its purpose being to represent its members who are property professionals and funders, developers, Iwi and Hapu, and owners and managers of properties in the Bay of Plenty. The UTF seeks to provide strong and informed leadership to Local Authorities, promote and foster productive local networks around property, and to advocate for the property industry by making submissions to both Central and Local Government.
4. Tauranga has experienced significant growth pressure in recent decades. Our community is facing unprecedented challenges because in the past leaders have seen growth as a problem rather than an opportunity. The intent of UTF is to focus on the opportunities presented by growth and to unlock these opportunities by working collaboratively and innovatively across Government, Local Government and the private sector.
5. UTF advocates for connected thinking, connected planning, connected governments and strong leadership. UTF’s submission is primarily focused on ensuring that

Variation 1 will be effective in achieving the intended outcomes required by the NPS-UD, in particular the urgent rezoning of land within the Tauriko West Urban Growth Area to provide for urgently needed residential land.

6. UTF supports Variation 1 which will promote medium density residential development to assist with housing supply and the currently housing capacity shortage.
7. Variation 1 adds significantly to housing capacity and contributes to a well-functioning urban environment.
8. UTF provides reasons it supports Variation 1 and respective changes sought to the provisions, which are set out in the attached table.

Decision sought

9. The decision UTF seeks from the Council is that Variation 1 be approved with:
 - (a) Minor amendments to address matters raised in UTFs submission.
 - (b) such further other relief or other consequential amendments as considered appropriate and necessary to address the matters set out in the submission.
10. UTF wish to be heard in support of their submission.
11. UTF would not gain an advantage in trade competition through their submission.
12. If others make a similar submission, UTF are prepared to consider presenting a joint case with them at any hearing.

SCOTT ADAMS
CHAIRMAN

Date: 8 April 2024

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Plan Section	Support/Oppose	Reasons	We seek the following decision
Planning maps - Extent of Rezoning	Support	UTF support the extent of rezoning shown on the planning maps as the rezoning gives effect to the NPS-UD, the Bay of Plenty Regional Policy Statement, the Bay of Plenty Smartgrowth Strategy and the RMA Amendment Act 2021.	We seek that the planning maps be adopted as notified and that the land be rezoned in accordance with the zoning shown on the planning maps.
Chapter 12 – Policy 12A.1.1.2.b (Target Yields in Urban Growth Areas)	Support in part	The proposed policy requires a yield of at least 25 dwellings per hectare within the Tauriko West Urban Growth Area. When the land was initially considered for development a yield of approximately 4,000 dwelling unit equivalents was anticipated. It is understood that there is approximately 157 ha of land suitable for development (which includes Stormwater management areas and land for up to two School sites) Clarification of how the current yield has been calculated is required.	We seek that clarification be provided by Council as to how the yield has been calculated and if necessary the number of dwellings per ha be adjusted based on the developable area. The yield should appropriately match the projected number of dwellings from the urban growth areas developable area for residential purposes which may have changed over time.
Chapter 12 – Policy 12A.1.1.3.g (Target Yield Shortfalls in Urban Growth Areas)	Support in part	The policy sets out that any shortfalls in achievement of net yield can be made up by higher yield development in other land parcels under the same ownership within the Tauriko West Urban Growth Area. Any yield shortfalls should consider how yield can be achieved across the entire Urban growth area (and should not be constrained to “other land parcels under the same land ownership” as currently worded	We seek that the policy be amended as follows: <i><u>For Tauriko West Urban Growth Area (UG11, Plan Map (Part B)), any shortfall in achievement of net yield may be made up by higher yield development from other land parcels within the Tauriko West Urban Growth Area.</u></i>

Plan Section	Support/Oppose	Reasons	We seek the following decision
Chapter 12 – 12B.1 – Objectives and Policies for Subdivision	Support in part	There are a number of specific Tauriko West objectives and policies have been included in the subdivision chapter. It is unclear whether these override the General Provisions.	We seek that The Plan be appropriately annotated to identify whether the specific objectives and policies for Tauriko West overrides those general objectives and policies for subdivision in the residential zone that currently apply to other Urban Growth Areas
Chapter 12 – Policy 12B.1.4.1 – (Subdivision in the Tauriko West Urban Growth Area)	Support in part	The wording of the current policy takes a protectionist approach to the State Highway network which is inappropriate and requires amendment.	Policy 12B.1.4.1.a be amended as follows: <i>a. <u>Manage the adverse traffic effects of development within the Tauriko West Urban Growth Area to promote the protect the functioning, and safe operation of the...</u></i>
Chapter 12 – Policy 12B.1.4.1.b & 12B.1.4.1.c (Reference to Infrastructure Ready)	Oppose	No definition is included with The Plan with respect to the reference of “ <i>infrastructure ready</i> ”.	We seek that the reference to “infrastructure ready” be deleted or defined.
Chapter 12 – Policy 12B.3.1.2.a (Development Intensity and Scale in Urban Growth Areas)	Support in part	As per our submission on Chapter 12 – Policy 12A.1.1.2.b (Target Yields in Urban Growth Areas), clarification on how density has been calculated is required	We seek that clarification be provided by Council as to how the yield has been calculated and if necessary the number of dwellings per ha be adjusted based on the developable area. The yield should appropriately match the projected number of dwellings from the urban growth area. Further s.32 analysis may be required based on the current planned landform and net developable area

Plan Section	Support/Oppose	Reasons	We seek the following decision
Chapter 12 – Policy 12B.3.1.19 (Specific Urban Growth Area Requirements – Transport Staging and Sequencing)	Oppose	These rules are prerequisites prior to any permanent land use occurring. They ignore the permitted level of development under the NDRS.	We seek that the rules make provision for the permitted level of development with respect to “permanent land use”.
Chapter 12 – Policy 12B.3.1.21.b (Specific Urban Growth Area Requirements – Stormwater Management)	Support in part	<p>Policy 12B.3.1.21.b, requires an application for subdivision and/or any permanent land use in the Tauriko West Urban Growth Area to provide a stormwater management assessment prepared by a suitably qualified stormwater engineer that demonstrates that the proposal is compliant with the relevant approved stormwater consent.</p> <p>The existing stormwater provisions contained with the City Plan are adequate to ensure that a stormwater management assessment is provided.</p>	We seek that 12B.3.1.21.b be deleted as requiring compliance with Regional stormwater consents is not considered appropriate within a District plan. Existing Stormwater provisions are considered appropriate in this regard.
Chapter 12 – Policy 12B.3.1.21.c (Specific Urban Growth Area Requirements – Stormwater Management)	Support in part	<p>We support low impact stormwater management and in particular inert materials being required for “roofing”.</p> <p>However the rule refers to “inert exterior building materials” are required for all buildings and structures”. This would included fencing, walls, concrete and asphalt and the like.</p>	<p>We seek that the rule be amended as follows:</p> <p><u><i>Inert “roofing” materials are required for all buildings”.</i></u></p>
Chapter 12 – Policy 12B.3.1.21.d (Specific Urban Growth Area Requirements – Stormwater Management)	Oppose	The provision requires stormwater run-off from Road A within the Tauriko West Urban Growth Area to be treated to achieve the requirements of the relevant stormwater consent prior to discharge to	We seek that d. be deleted. This is a Regional Council consent compliance requirement and is inappropriate within the City Plan.

Plan Section	Support/Oppose	Reasons	We seek the following decision
		any water body.	