



**Western Bay of Plenty
District Council**

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Office of the Mayor

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He Tūāpapa ki te Ora, Infrastructure for a Better Future Consultation
Te Waihanga, the New Zealand Infrastructure Commission
Level 7, The Todd Building,
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To the New Zealand Infrastructure Commission,

Submission on He Tūāpapa ki te Ora – Infrastructure for a Better Future

The Western Bay of Plenty District Council (WBOPDC) thanks Te Waihanga, the New Zealand Infrastructure Commission for the opportunity to submit on He Tūāpapa ki te Ora – Infrastructure for a Better Future Consultation Document (the Consultation Document).

WBOPDC welcomes He Tūāpapa ki te Ora – Infrastructure for a Better Future. A forward focused and detailed acknowledgement of the nation's infrastructure needs has been long overdue, and we look forward to the finalised Infrastructure Strategy and identification of practical actions.

About the Western Bay of Plenty

We are a Territorial Authority that covers 195,000 hectares of coastal, rural and urban areas in the Bay of Plenty Region. Less than 1% of the total area is urban and includes the towns of Waihi Beach, Katikati, Ōmokoroa, Te Puke and Maketu. Smaller rural settlements are located across the District. Along the Pacific Coast, Waihi Beach and Pukehina Beach have grown from being popular holiday places to places with higher proportion of permanent residents. WBOPDC manages and maintains over \$1.43 billion worth of assets for our communities.

The spread of settlements and topography across the District makes the delivery of infrastructure more expensive compared to a compact single settlement like a city. We are also a rapidly growing district with a current estimated population of 57,300 and expected to reach 71,300 by 2051. Responding to the challenges and opportunities this presents is a key



focus for WBOPDC in partnership with neighbouring Territorial Authorities, Regional Council, Iwi and Central Government.

Overall

The Western Bay of Plenty District Council supports the majority of the recommendations made. However, there are some substantial gaps and further consideration required.

WBOPDC supports the submission made by Taituarā, and the recommendations made in that submission. There are a number of additional points we wish to emphasise and expand on.

Specific matters

Community Infrastructure has been overlooked

An important sector of infrastructure has been overlooked in the strategy – Community Infrastructure. Consideration should be given towards including this sector in the strategy, and recognises that it covers a broad range of social/cultural/recreational infrastructure.

Our Council has a focus on placemaking to develop great places to live, learn, work and play. It appears that the last point of this has been overlooked in the Consultation Document. The current focus regarding community/social infrastructure is limited to Health and Education. Community halls, libraries, swimming pools, theatres, sports facilities, parks, playgrounds and walking and cycling networks, etc. are all essential community infrastructure, delivering on community wellbeing, helping to develop social cohesion, enhance community resilience and health and enabling economic opportunities. Consideration of the current provision of this sector, accessibility, the impacts of demographic changes and the likely implications would be welcomed.

WBOPDC request that consideration of Community Infrastructure be included in the final draft Strategy.

Delivering on spatial plans

Spatial plans are a useful tool, but only in combination with others and combined with a clear commitment to action from all parties. Through SmartGrowth (a partnership of WBOPDC, Tauranga City Council, Bay of Plenty Regional Council, Iwi and Central Government) we have been engaged in spatial planning for our sub-region since 2004. Effective planning has enabled identification and prioritisation of growth areas and the necessary supporting infrastructure.

A significant concern for us has been the failure of Central Government agencies to commit and deliver on the necessary infrastructure improvements (in particular the state highway network) to enable identified growth nodes to develop effectively. For the Western Bay of Plenty sub-region, the development of Ōmokoroa is a clear example of this issue.

Ōmokoroa has been identified as a growth area as far back as the 1970s. It gradually grew over time and this, along with growth in the surrounding rural area and the northern corridor in general, resulted in Waka Kotahi (Transit at the time) putting in place designations to improve SH2.

In 1998 the Notice of Requirement (NOR) for the Tauranga Northern Link - Tauranga to Te Puna (TNL) was lodged. This was followed in 2001 by the NOR for Four-laning Te Puna to Ōmokoroa.

This gave Council confidence to invest in the peninsular as a growth area and the planning by Council for the urbanisation followed.

- 2002 – Council changed the District Plan (PC20 - Ōmokoroa Stage 1) and introduced a Residential Zone from the existing village to the railway.
- 2004 – SmartGrowth (including Waka Kotahi) confirmed Ōmokoroa as a growth area.
- 2007 – PC69 (Ōmokoroa Stage 2) reviewed Stage 1 plus zoned parts of the land between the railway and SH2 for residential, commercial and industrial purposes.

PC69 coincided with the resolving of the wastewater issue with the installation of the pipeline to Tauranga in the same year. This pipeline and the accompanying reticulation was a \$34 million investment. Further investment has been made by Council for other essential infrastructure. These investments are recouped through financial contributions, thus the impacts of not delivering on the roading solution in slowing (or worse still stopping) growth has a significant impact on Council's balance sheet.

We are now in 2021, with a plan change about to be notified for the development of Ōmokoroa stage 3, to enable the deliver of around another 2300 dwellings. However, the necessary State Highway and interchange improvements have still not been made, despite their early designation and repeated assurances.

This has further been accentuated with the recent Central Government decision to withdraw NZ Upgrade Programme funding for the Ōmokoroa to Te Puna stage of the Tauranga Northern Link. The upgrades designated, planned for and promised since before 1998 have not been delivered.

Council is required under the National Policy Statement Urban Development to enable development. Ōmokoroa is the key growth node for the district and indeed for the sub-region. Council has significant sunk infrastructure costs in Ōmokoroa to enable this planned growth. However, the state highway network is woefully inadequate.

To be clear, this example shows that whilst spatial planning has benefits, the failure of Central Government agencies to actively deliver on their identified projects can cripple its effectiveness. Commitment to deliver by all agencies is essential to delivery by all agencies is essential to achieve the benefits of spatial planning.

WBOPDC requests that option C2.5 be amended to recommend Central Government agencies be required to be involved in regional spatial planning, and that all parties commit to undertake the necessary actions and commit funding to deliver the necessary infrastructure.

Building communities

The drive to build more houses is important, but it is vital that the focus is on;

- 1) quality as well as numbers, and
- 2) houses across the full range of typology and affordability.

The emphasis should be to build good places for all people on the pricing spectrum to live. Local Government, Central Government, developers, iwi and other agencies need to ensure that community building for everyone is the focus of spatial plans. Community infrastructure and social infrastructure are key elements to be considered and planned for alongside other infrastructure needs.

Building communities requires a level of local knowledge, understanding and localised community engagement. This may not sit comfortably within a region-wide process. Clear communities of interest exist and in many cases these would be a better basis of planning than the existing regional boundaries.

WBOPDC requests that option C2.5 be amended to recommend that all infrastructure needs are considered and planned for, including community and social infrastructure.

WBOPDC requests that option C2.5 be amended to recommend that where appropriate spatial plans be completed at lower than regional levels.

Transportation and inter-regional connectivity

Recognition of the value that enabling the efficient and effective movement of goods, material and people across regions is essential for transport networks. New Zealand's natural geography and generally low population density requires suitable connecting infrastructure to reduce the cost to do business in New Zealand. This is important for freight (as expressed by the Upper North Island Freight Story), but also for people. This is essential to deliver equity of opportunities for communities across the country and to more widely enable economic opportunities.

We acknowledge that some narrative is included in the Consultation Document. However, this does not lead to any options or recommendations in the document. The challenge is outlined but the response is missing. Whilst option C5.1 would be beneficial, this appears too focused on freight and could potentially embed current regional disparities, rather than enabling a transformative network.

WBOPDC request that efficient and effective inter-regional connectivity be better recognised, with the inclusion of an option to enable its improvement across the country.

Transportation and urban form

The need to deliver modal choice, reduce transport related emissions and enable thriving communities is widely understood.

The best mechanism to encourage low-carbon transport options is to design urban growth around those modes. This may be increased utilisation of rail corridors, increasing public transport options and delivering walking and cycling choices. The provision of park and ride facilities is also a necessity; this recognises that New Zealand will continue to have a dispersed population and face geographical bottlenecks, even at a sub-regional and local level.

Western Bay of Plenty District Council has worked closely with Tauranga City Council, Bay of Plenty Regional Council, Iwi, Central Government and Waka Kotahi on the Urban Form and Transport Initiative (UFTI), under SmartGrowth. This project integrated growth and transport planning to guide the future urban form of the Western Bay of Plenty sub-region. The final and optimal programme – 'Connected Centres' – tries to get the best and optimal balance between the intensification of existing urban and new growth areas ('up and out' development areas). These optimise existing services and infrastructure provision, along with the design of a future transport system that enables the effective and relatively efficient movement of people and goods along specific corridors.

Enabling infrastructure is essential to deliver on this. This covers both transportation infrastructure and provision of accessible alternatives to private motor vehicle, but also the need for community infrastructure to attract growth and intensification to the right places.

We would like to note that Central Government intervention to encourage the private motor vehicle fleet to transition to electric vehicles is the most effective method to lower emissions.

WBOPDC requests that the connection between transportation and urban form is better communicated and that urban design is included as a tool for transport solutions.

WBOPDC requests that option F1.4 be amended to clearly allow for necessary enabling infrastructure, such as park-and-ride to be considered alongside other 'non-built' solutions.

Transportation and equity

We are pleased to see that equity impacts are being considered as part of the discussion regarding congestion pricing. For our District, a significant portion of our community travel to their place of work, to schools, and to essential services in Tauranga City. Being able to access economic opportunities, and not being penalised for where our residents have to travel from is essential to the wellbeing of both individuals and our wider communities. We do not want to create a system that has negative consequential effects. Recognition that equity of access is needed for any proposed response. With particular regards to congestion pricing, we would like to see this utilise smart charging to only charge when/where suitable alternatives are available; we would also like to see greater emphasis on the provision of alternatives being a pre-requisite for charging.

WBOPDC requests that option C3.3 be expanded to include ensuring that alternative transport options are planned and implemented in advance.

Amenity matters

The attitude taken in the document towards 'subjective amenity issues' is concerning. We fully recognise that the current planning system has led to a greater number of barriers, delays and costs, however amenity issues are not fully to be blamed. Consideration of these amenity matters is necessary in any new regime. Development does not occur in a vacuum, but in a community. Amenity matters to all communities. For modern communities where housing density is encouraged by Central Government, the development of appropriate amenity value is fundamental to great placemaking. Considerations of the impacts on the community,

subjective or not, should play a part in a decision making process. The key (and a rather elusive one) is to ensure that the correct balance is found. The development of a clear set of rules that reflect the local priorities would assist.

WBOPDC requests that discussion in the document regarding amenity (including options C1.1, C1.3 and S.7.3) is reconsidered with a whole of community lens.

Infrastructure planning and waste

Further to the suggested opportunities outlined in the Consultation Document, WBOPDC would suggest that no-build options should be required to be considered first for all projects. Requiring explicit thinking for no-build options may help identify opportunities to maximise existing infrastructure and limit any waste generated. This concept also aligns with approaches to limit infrastructure carbon.

WBOPDC requests that option F1.1 be expanded to require the consideration of no-build options upfront.

The Consultation Document asks how infrastructure can be used to reduce waste but no corresponding option is given beyond pricing. WBOPDC recommends that local reuse and consolidation points for waste and recyclable material are essential. Making recycling and waste minimisation easily accessible and limiting the transportation costs involved, is key to reducing landfill waste. Enabling local communities to actively take part drives ownership and engagement. Investing in local re-use infrastructure is required. Much of the narrative in the Consultation Document is overly focused on centralisation and large scale options, rather than on community led opportunities or dispersed approaches.

WBOPDC requests increased recognition of dispersed local opportunities to reduce waste and increase diversion from landfill.

Consideration of aggregation

The Consultation Document rightly acknowledges the potential benefits that come from scale and aggregation, but we are concerned that there is limited detailed consideration of this. Economies of scale is one advantage, but local knowledge, understanding and agility is important to retain. The hub and spoke approach is internationally recognised and may be suitable for some situations. Detailed analysis and consideration of any proposal is required. We are pleased to see this has been undertaken for water services and look forward to seeing the more detailed Council specific data. Further work is required to consider if this is the right approach for other sectors.

The question regarding a Central Government agency that would procure and deliver infrastructure projects is noted. The establishment of a new 'Ministry of Works', requires detailed and thoughtful analysis. Whilst there may be some benefits, there are some significant risks. We fully agree that capacity and skills development is a priority for the infrastructure sector generally, but are yet to be convinced that a Central Government agency would necessarily improve this.

WBOPDC requests that the need for quality evidence-based analysis to inform proposals of aggregation is noted in the strategy.

Review of the Future for Local Government

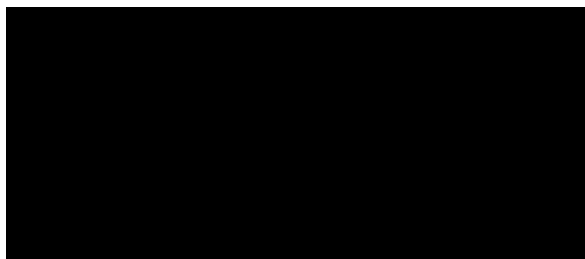
Enabling local communities to take a greater role in decision making for their areas and to give agency to their voice is a necessity. The ability for Local Government to have access to a greater number of funding, financing, and infrastructure levers will help communities plan and grow. We note that the Review of the Future for Local Government will look at the balance of roles between central and local government.

WBOPDC requests that option S1.2 be amended to recognise that the Review of the Future for Local Government will look at the balance of roles between central, regional and local government.

In summary

WBOPDC are pleased to see serious thought and attention being given to infrastructure, however it is clear that substantial further work on the strategy is needed for it to fully deliver on its potential. We look forward to the Commission's consideration of the recommendations WBOPDC makes through this submission and those of Taituarā's submission.

Yours sincerely,



Mayor – Western Bay of Plenty District Council