

Operative City Plan
Section 32 evaluation report

Plan Change 26 – Housing choice



Tauranga City

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1. Interpretation

In this Report:

Abbreviation	Meaning
BoPRC	Bay of Plenty Regional Council
CDD	Comprehensively designed development
City Plan	The Operative Tauranga City Plan
CTC	City Transformation Committee
FDS	Proposed SmartGrowth Future Development Strategy 2018
HASHAA	Housing Accords and Special Housing Areas Act 2013
IBC	Indicative Business Case
LGA	Local Government Act 2002
NPS-UD	National Policy Statement on Urban Development 2020
NPS-UDC	National Policy Statement on Urban Development Capacity 2016
NZCPS	New Zealand Coastal Policy Statement 2010
PPC26	Proposed Plan Change 26 – Housing Choice
PPC27	Proposed Plan Change 27 - Flooding from intense rainfall
RPS	The Operative Bay of Plenty Regional Policy Statement
RMA	The Resource Management Act 1991
ROF	Residential Outcomes Framework
TCC	Tauranga City Council
Te Papa Spatial Plan	Refers to a plan that Council has prepared that provides a blueprint for growth in the Te Papa Peninsula over the next 30 years and informs the location of the identified Te Papa Housing Overlay.
TUS	Proposed Tauranga Urban Strategy 2050
UFTD	Urban Form and Transport Development Committee
UFTI	Urban Form and Transport Initiative

2. Introduction

2.1. Purpose of the report

2.1.1. Requirements of section 32

This report has been prepared to fulfil the obligations of Tauranga City Council (TCC) under section 32 of the RMA, with respect to undertaking a Plan Change to the Operative Tauranga City Plan (City Plan). This report should be read together with the text of the City Plan itself and the Proposed Plan Change.

For any Plan Change to an Operative City Plan, TCC is required under section 32 of the Resource Management Act 1991 (RMA) to carry out an evaluation of whether objectives of a proposal are the most appropriate way to achieve the purpose of the Act (i.e. sustainable management of natural and physical resources).

A section 32 evaluation must also examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by identifying other reasonably practicable options for achieving the objectives and assessing the efficiency and effectiveness of policies, rules and other methods in considering whether they are the most appropriate means of achieving these objectives.

The evaluation must consider the benefits and costs associated with each policy, rule or method and also the risk of acting or not acting if there is uncertain or insufficient information on the subject matter.

2.1.2. Overview and purpose of the plan change

Tauranga has experienced strong population growth in recent years, and this is projected to continue for several decades. Consequently, housing demand and costs have increased considerably. The existing rule frameworks within the City Plan for the Suburban Residential, Commercial and City Living zones are inconsistent with emerging land use strategies and are not achieving desired built form outcomes for existing urban and suburban areas, nor sufficiently providing for the city's ongoing high rate of population growth.

Two workstreams have been progressed to address this growth context; PPC26, which applies across the city and the Te Papa Spatial Plan. The land use component of the Te Papa Spatial Plan will be delivered through PPC26.

The purpose of PPC26 is to:

- (a) Partially address residential development capacity constraints and contribute towards achieving the targets for housing development capacity as set out in the City Plan and the RPS;
- (b) Enable a variety of housing choice across the city;
- (c) Reduce pressure on urban expansion and associated infrastructure investment requirements by enabling more intensification of existing urban areas;
- (d) Creating quality built form outcomes;
- (e) Deliver on a more compact city as outlined in the FDS and TUS; and
- (f) Give effect to higher order documents; in particular the NPS-UD and the RPS.

It should be noted that PPC26 is an interim plan change to address housing capacity issues prior to the City Plan Review, which will be notified in April 2024. Through the City Plan Review a more comprehensive review will be undertaken of the overall approach to residential development across the city. As part of this it is likely that further areas will be identified for intensification and further spatial planning exercises will be undertaken to support this.

2.1.3. Scope of plan change

PPC26 focuses on the residential intensification of existing urban areas. The key aspects of PPC26 are:

- (a) Suburban Residential Zone:
 - (i) Enable duplexes and comprehensively designed development (in the form of terraces/townhouses).
- (b) Te Papa Peninsula:
 - (i) Enable duplex dwellings and comprehensively designed development (terraces/townhouses/apartments) through the introduction of the Te Papa Housing Overlay and amended City Living Zone provisions. The provisions of the zone and the overlay are to be aligned to achieve the same built form outcomes;
 - (ii) Increase height limits in the Commercial Zone in Te Papa to align with height limits of surrounding residential activities.
- (c) Commercial Zone:
 - (i) Introduce on-site amenity and urban design provisions for residential activities.
- (d) Urban design:
 - (i) Introduction of a non-statutory urban design guide known as the ROF;
 - (ii) Key aspects of the ROF have been pulled through into the objectives, policies and assessment criteria of the City Plan;
 - (iii) This will be applied to the comprehensively designed developments mentioned above and residential activities in the Commercial Zone.

There are also two proposed plan changes being progressed in parallel to PPC26. Proposed Plan Change 27: Flooding from Intense Rainfall Events proposes to manage the effects of flooding caused by intense rainfall, which is imperative to ensure the delivery of greater density maintains the health and safety of residents. PPC26 relies on the risk assessment undertaken and rule framework developed through PPC27 to meet the RPS natural hazard outcomes for flooding from intense rainfall. Also, Proposed Plan Change 30: Earthworks is being progressed to address sediment control issues and provide controls over post-subdivision earthworks to address site stability issues.

2.2. Background/ Existing context

2.2.1. The need for the plan change (growth context)

Tauranga is the fourth smallest territorial authority by land area at 135km² and has experienced exponential growth driven by strong inward migration and investor activity from outside the local market area. This strong growth is expected to continue in the future. The most recent census from June 2018 indicate that there were around 51,150 occupied dwellings in the city with a population of 140,800. The population is expected to continue to grow over the next thirty years to 202,000, an increase of 61,200. Occupied dwellings are projected to grow by 23,600 over the next 30 years¹.

¹ Stats NZ Estimated Resident Population (ERP).

Coupled with this growth, Tauranga has become the least affordable city in New Zealand when comparing the ratio of house prices to incomes. Tauranga is also seeing demographic changes with an aging population and future predominance of couple only or one person households, which increases the need to provide smaller homes. Between 1991 and 2017, the median house price increased by 464 per cent in Tauranga. During the same timeframe, household incomes only increased by 128% in Tauranga². Rents have also grown much faster than incomes, leading to increasing renter stress and impacting on households at higher income levels. As at 2017, nearly 90 per cent of renters could not afford to purchase a home priced at \$500,000³. This benchmark is below the 2017 median house price of \$620,000 in Tauranga. In the past three years median house prices have continued to climb rapidly; reaching \$690,000 in Tauranga, by December 2019. In January 2017, six suburbs in Tauranga had a median property value at or below \$500,000 (Gate Pā, Greerton, Poike, Tauranga Hospital, Te Reti and Yatton Park), however by December 2019 only three suburbs (Parkvale, Poike and Gate Pā), were at or below \$500,000.⁴

Housing choices are limited for people looking for smaller and lower cost homes. Seventy-five per cent of the sub-region's existing housing is standalone, with three or more bedrooms. Single and two-person households occupy a majority of existing homes, but larger, more luxurious housing continues to dominate new builds. Strong demand makes this type of housing profitable and lowers risk for developers.⁵

The market also provides apartments for the mid to upper end of the market, but higher risk and lower returns on duplex and terraced housing generally means the feasibility of these typologies is low. Building duplex and terraced infill housing in existing urban areas is particularly challenging due to the high up-front cost of preparing sites for redevelopment.

Demand for medium density homes close to schools, retail and public transport would be greater if the market could deliver homes under \$450,000 to \$500,000 (2017 benchmarks), within 8 kilometres of Tauranga's central business district. Current land and building costs make this very difficult.⁶

While development economics is the main driver for developers, other factors influencing the products coming to market may include difficulty meeting lending criteria for medium and high density housing, limited experience with these types of housing, and a perception that higher density developments have more complex building and consenting requirements.⁷

In addition, Tauranga faces physical development constraints. Residential development supply is subject to factors influencing delivery such as staged development of large blocks, large blocks being committed to retirement village projects, or held in multiple-ownership (Māori Land), infrastructure constraints, land-banking and complexities such as natural hazards.

Key development constraints associated with the future large greenfield areas of Te Tumu and Tauriko West include, a requirement for transformational corridor-level transport projects for Tauriko West, while Te Tumu relies on access through multiple-owned Māori land. As these areas are assumed to provide for a large proportion of projected medium to longer term dwelling growth (Te Tumu 6,000 homes, Tauriko West 3,000 homes) housing supply may be constrained if these matters cannot be resolved in a timely manner.

² Smartgrowth: Housing Demand and Need in Tauranga and Western Bay of Plenty, Community Housing Solutions Ltd, November 2017

³ Tools for increasing social and affordable housing in the Western Bay of Plenty, Research for the Urban Form and Transport Initiative, March 2020

⁴Source – Corelogic, Ministry of Housing and Urban Development Capacity Dashboard. Note that Quotable Value (QV) NZ average house value for Tauranga at January 2017 was \$672,752 and December 2019 \$763,422.

⁵ Tools for increasing social and affordable housing in the Western Bay of Plenty, Research for the Urban Form and Transport Initiative, March 2020

⁶ Tools for increasing social and affordable housing in the Western Bay of Plenty, Research for the Urban Form and Transport Initiative, March 2020

⁷ Tools for increasing social and affordable housing in the Western Bay of Plenty, Research for the Urban Form and Transport Initiative, March 2020

In early 2019, TCC commissioned an independent review of remaining residential capacity in the Western Bay of Plenty sub-region⁸ which confirms that a realisable supply of 18 months' residential development capacity is available and estimates that in the short-term 1-3 year period there will be an undersupply of nearly 1,000 new dwellings. While the short-term shortfall has decreased significantly (due to reductions to the growth projections in response to 2018 census results and the expected impacts of COVID-19 pandemic), medium and long term housing shortfalls are still projected. The void between projected growth rates for housing development and realisable supply will grow in the medium-term to approximately 5,000 dwellings, until new supply is zoned and enabled for development.

In terms of infill and intensification of existing urban areas, the RPS seeks that 25% of projected growth should be provided through intensification of residential development within existing urban areas. Currently intensification and infill has been identified as contributing approximately 15% of all residential development. It has been recognised that in order to meet demand and achieve targets for housing development capacity this figure will need to increase.⁹

There is also strong direction from central government through the NPS-UD. This document identifies Tauranga as a tier 1 urban environment that at all times must provide at least sufficient development capacity to meet expected demand for housing in existing and new urban areas, for both standalone and attached dwellings and in the short, medium and long term.¹⁰ This direction is given local context through the 'compact city' direction in the FDS and TUS. Further discussion on these documents is provided in latter sections of this report.

In order to provide for growth and align with the direction of higher order documents and other strategies Tauranga must develop 'up' and 'out' to accommodate increasing demands for housing and to achieve the targets for housing development capacity as set out in the City Plan and RPS.

The existing rule frameworks within the Tauranga City Plan for the Suburban Residential, Commercial and City Living zones are inconsistent with emerging land use strategies and are not achieving desired built form outcomes for existing urban and suburban areas, nor sufficiently providing for the city's ongoing high rate of population growth and address the short term housing land supply shortfall. Further, it has been identified that the City Plan could be more conducive to providing for the intensification of existing urban areas, particularly when compared with other high growth areas in New Zealand.¹¹

PPC26 is being advanced to enable more infill and intensification opportunities in the existing urban area. It is intended that PPC26 will partially address residential development capacity constraints through enabling a variety of housing types and reducing pressure on urban expansion and associated infrastructure investment requirements through enabling more intensification, in order to deliver a more compact city. It is considered imperative to advance PPC26 ahead of the full City Plan Review as the current City Plan rule framework is restrictive and unable to react to the challenges of population growth. Removing or reducing constraints to development capacity is considered to be fundamental to enabling housing.

⁸ Western Bay Sub-Region Residential Development Capacity Review, Veros, May 2019

⁹ Proposed SmartGrowth Future Development Strategy

¹⁰ Section 3.2(1), National Policy Statement on Urban Development 2020

¹¹ Enabling Growth – Urban Zones Research: Key Observations, Findings and Recommendations' 2018 Beca

3. Relevant legislation, strategies and policies

The following sections discuss the legislative and national, regional and local policy framework that provides the context for PPC26. Further evaluation has been undertaken against these documents throughout this section 32 evaluation and in the appendices.

3.1. Resource Management Act 1991 (RMA)

Section 74 of the RMA requires a territorial authority to change its district plan in accordance with the provisions of Part 2. Similarly, section 32(1)(a) of the RMA requires an evaluation report to examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA. The purpose and principles are set out in Part 2, sections 5-8 of the RMA. Other sections of the RMA which are also considered relevant to PPC26 are set out below.

Section 5 – Purpose of the Act

Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources. Sustainable management *'means managing the use, development, and protection of natural and physical resources to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety, while -*

- *sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- *safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- *avoiding, remedying, or mitigating any adverse effects of activities on the environment'*

PPC26 is considered to be consistent with the purpose of Part 2 of the RMA as it will promote the sustainable management of the land resource available for residential development to enable people and communities to provide for their social and economic well-being. PPC26 will also assist with meeting the reasonably foreseeable needs of future generations, safeguard the life-supporting capacity of the natural environment and avoid, remedy or mitigate any adverse effects of activities on the environment;

In achieving this purpose, councils also need to recognise and provide for the matters of national importance identified in section 6, have particular regard to other matters referred to in section 7 and take into account the principles of the Treaty of Waitangi under section 8.

Section 6 – Matters of national importance

Section 6 outlines matters of national importance that shall be recognised and provided for in achieving the purpose of the RMA. It is considered that these matters are recognised and provided for either through PPC26 or the existing provisions of the City Plan. Although PPC26 provides for increased development opportunities it should be noted that these are within existing urban areas where City Plan provisions are currently in place to address matters of national importance. However, specific provisions have been included in PPC26 to address natural hazards. This has also partially been addressed through PPC27. This will ensure that the management of significant risks from natural hazards as required by section 6(h) are recognised and provided for and will also give effect to the natural hazard provisions in the RPS. The approach to natural hazards is further set out in Appendix 1;

Section 7 – Other Matters

Section 7 outlines other matters which require Councils to have particular regard to in relation to managing the use, development, and protection of natural and physical resources.

PPC26 specifically seeks to address the efficient use and development of natural and physical resources through providing for a greater opportunity for residential development in established urban areas. This will assist with using land and infrastructure more efficiently. The introduction of the ROF (which is implemented through objectives, policies and assessment criteria) addresses energy efficiency, the maintenance and enhancement of amenity values and the maintenance and enhancement of the quality of the environment;

Section 6 – Matters of national importance

All persons exercising functions and powers under the RMA must take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

In this regard, significant engagement has been undertaken with Tangata Whenua throughout the development of PPC26. In particular, engagement has been undertaken with Te Rangapū Mana Whenua o Tauranga Moana and iwi authorities. This is further discussed in section 5 Consultation and Engagement;

Section 31 – Functions of territorial authorities under the Act

Section 74(1) of the RMA requires a territorial authority to change its district plan in accordance with its functions under s31. Section 31 of the RMA was amended in 2017 to give territorial authorities the function of the 'establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district'.

Also, of relevance to PPC26, Section 31(1)(b) gives territorial authorities the function of 'the control of any actual or potential effects of the use, development, or protection of land including for the purpose of the avoidance or mitigation of natural hazards. Access to housing is fundamental to providing for the well-being of current and future residents of Tauranga. PPC26 will provide for additional residential development capacity and variety to assist with meeting growth demands and needs.

Section 75 – Contents of district plans

This section of the RMA requires district plans to contain an appropriate framework to give effect to higher order statutory documents. It is considered that these matters are recognised and provided for either through the existing provisions of the City Plan or PPC26. Sections 3.3 to 3.7 provides an assessment on how PPC26 gives effect to higher order documents.

Section 76 – Effects of activities on the environment

Under section 76(3) of the RMA, when evaluating rules, the Council must have regard to the actual or potential effects of activities on the environment. The effects on the environment are considered through the options analysis in Sections 10, 11, 12 and 13 of this Report.

3.2. Housing Accords and Special Housing Areas Act 2013 (HASHAA)

The Housing Accords and Special Housing Areas legislation enabled the streamlining of new housing developments and allowed special housing areas to be designated under accords between the Government and Council.

Council signed the Tauranga Housing Accord with the Government in August 2014. This established Council as an 'accord territorial authority' under HASHAA. Between 2013 and the expiry of the Tauranga Housing Accord in 2019, 14 special housing areas were approved, 12 of which proceeded to consenting stage, and 10 areas are now being or have been developed for housing. Delivery of the special housing areas provided capacity for over 3200 new homes. This enables significant development capacity within existing urban areas.

No further Special Housing Areas applications can be made, and the HASHAA will be repealed on 16 September 2021. Given that this opportunity to provide capacity for new homes no longer exists, it further reinforces the need for PPC26 to enable increased development capacity.

3.3. National Policy Statements

Under section 75(3)(a) of the RMA a district plan must give effect to any national policy statement.

3.3.1. The National Policy Statement on Urban Development 2020 (NPS-UD)

The NPS-UD came into effect on 20 August 2020. This replaced the NPS-UDC.

The objectives of the NPS-UD seek to achieve the following:

- (a) Well-functioning urban environment that enable people to provide for their social, economic and cultural well-being, and for their health and safety, now and into the future;
- (b) Planning decisions that improve housing affordability;
- (c) Enable more people to live in areas of an urban environment that are near centres, employment, well served by public transport or there is a high demand for housing;
- (d) Recognition that urban environments and amenity values change overtime;
- (e) Planning decisions take into the principles of the Treaty of Waitangi;
- (f) Decisions on urban development are integrated with infrastructure and planning decisions, strategic over the medium and long term, and responsive;
- (g) Local authorities have robust and up to date information about their urban environments and use it to inform planning decisions;
- (h) Urban environments support reductions in greenhouse gases and are resilient to the effects of climate change.

The NPS-UD identifies TCC as a tier 1 Council.

PPC26 gives effect to the NPS-UD as far as it is relevant to the plan change. In particular, PPC26 will enable the development of a variety of homes in terms of type, price and location across the Suburban Residential Zone, Commercial Zone, City Living Zone and Te Papa Housing Overlay

The greatest focus on intensification is the Te Papa peninsula, due to its strategic location. Housing development of up to 6 storeys will be enabled where it is easily accessible to jobs, services, open spaces and public transport.

In the development of PPC26 engagement with iwi and hapū has been ongoing since early 2019. Through this engagement, feedback was received, including the values and aspirations of iwi and hapū. As far as possible these matters have been addressed through PPC26, however some matters were identified as being more appropriately addressed through the full City Plan Review which will be notified in 2024. Section 5 and Appendix 10 provide more information on iwi and hapū engagement.

PPC26, along with greenfield areas, will assist with providing development capacity to meet expected housing demand. An assessment has been undertaken to understand the development capacity that PPC26 will enable, included as Appendix 5.

How the plan change gives effect to the specific objectives and policies of the NPS-UD is addressed further in Appendix 2a and Appendix 7.

3.3.2. New Zealand Coastal Policy Statement

Section 75(3)(b) of the RMA states that a district plan must give effect to any New Zealand Coastal Policy Statement. The NZCPS sets out the objectives and policies in order to achieve the purpose of the RMA in relation to the coastal environment.

The NZCPS is also given effect to through the RPS and more recently the Bay of Plenty Regional Coastal Environment Plan. These policy documents provide direction on how the NZCPS is implemented for the Bay of Plenty Region.

The Regional Coastal Environment Plan and the RPS identifies the coastal environment for the Bay of Plenty Region including for Tauranga City.¹² This coastal environment includes parts of the Mount Maunganui peninsula, the Te Papa peninsula and Otumoetai comprising Suburban Residential, City Living, Commercial and City Centre zones. The Coastal Environment Plan identifies areas of high value related to biodiversity, landscape and natural character, and includes provisions to protect those areas. PPC26 does not affect any areas identified as having high value. As a result, a number of NZCPS provisions, including the directive policies would not apply to PPC26.

In general, the NZCPS requires consideration of the rate at which built development should be enabled to provide for reasonably foreseeable needs of population growth and encourages consolidation of existing urban areas. PPC26 gives effect to these policy directions through enabling greater housing choice and density in existing urban areas. Further provisions have also been developed as part of PPC26 that address natural hazards in the coastal environment. See Appendix 1 for further discussion regarding the approach to natural hazards.

The PPC26 provisions will encourage intensification of the existing residential land resource which will provide for consolidation of existing urban areas. It does not seek to rezone any greenfield areas. Appendix 2b contains a more detailed assessment against the NZCPS.

3.4. National Planning Standards

Section 75(3) requires a district plan to give effect to a national planning standard. The first set of national planning standards came into force on 3 May 2019. They aim to make RMA plans more consistent and easier to use. They provide direction on the structure and form of plans, including definitions. Tauranga City Council has five years from when the planning standards came into effect to implement the planning standards. Given the scope of PPC26 and the format and style of the City Plan in comparison to the national planning standard requirements, it is considered more appropriate to implement the national planning standards in a holistic and integrated way through the City Plan Review, which will be notified in April 2024.

3.5. Regional Policy Statement (RPS)

Section 75(3)(c) of the RMA states that a change to a district plan must give effect to any regional policy statement.

The RPS promotes the sustainable management of the Bay of Plenty Region's natural and physical resources and identifies the resource management issues facing the region and the objectives, policies and methods to achieve the integrated management of these resources across the Bay of Plenty.

The RPS contains a number of provisions that are of relevance to PPC26. Part two of the RPS contains regionally significant resource management issues which are divided into topic areas. Topic areas of relevance to the management of residential activities by territorial authorities include the coastal environment, energy and infrastructure, integrated resource management, iwi resource

¹² Maps 11-15 and 46 of the Operative Regional Coastal Environmental Plan.

management, urban and rural growth management, natural hazards and water quality. Part three of the RPS contains the policy and method framework.

Engagement has been undertaken with BoPRC and they have indicated that they support the purpose of PPC26. How the plan change gives effect to the relevant provisions of the RPS is addressed further in Attachment 2c.

3.6. Regional Plans

Under section 75(4) of the RMA a district plan must not be inconsistent with a regional plan for any matter specified in section 30(1). Engagement has been undertaken with BoPRC and they have indicated that they support the purpose of PPC26. Under section 75(5), a district plan cannot be inconsistent with a regional plan.

3.6.1. Bay of Plenty Regional Natural Resources Plan (RNRP)

The purpose of the Regional Natural Resources Plan (RNRP) is to promote the sustainable and integrated management of land and water resources within the Bay of Plenty. To achieve this, the RNRP has policies and methods (which include rules) to address issues of use, development and protection of land resources, geothermal resources and freshwater resources, including the beds and margins of water bodies.

PPC26 involves intensification of the existing residential land resource. Accordingly, there are no specific provisions in the RNRP that influence the general planning direction and subject matter of PPC26.

3.6.2. Bay of Plenty Regional Coastal Environment Plan (RCEP)

The Regional Coastal Environment Plan (RCEP) promotes sustainable management of the natural and physical resources of the coastal environment incorporating values and issues for the coastal marine areas such as natural heritage, water quality, cultural values, public access and natural coastal hazards. It recognises that such issues cross the land/water divide and cannot be effectively managed in isolation from the land component of the coastal environment.

PPC26 involves intensification of the existing residential land resource. Accordingly, there are no specific provisions in the RCEP that influence the general planning direction and subject matter of PPC26.

3.6.3. Bay of Plenty Regional Land Transport Plan 2018 (RLTP)

Under section 74(2)(b)(i) of the RMA when changing a district plan, a territorial authority shall have regard to management plans and strategies prepared under other Acts. The RLTP is one of the relevant strategies.

The RLTP is prepared by the Regional Council and sets the direction for the region's land transport system for the next 30 years. It is a statutory requirement of the Land Transport Management Act 2003 (LTMA). Engagement has been undertaken with BoPRC and they have indicated that they support the purpose of PPC26.

The RLTP recognises that there is a strong relationship between land use patterns and transport factors, such as viability of different modes. Of particular relevance is Policy 5.3 Land use and transport integration which seeks to ensure that the location and design of new brownfield and greenfield development in urban areas gives effect to minimising the number of private motor vehicle trips and increasing the uptake of walking, cycling and public transport.

Through enabling greater housing capacity in existing urban areas, in particular the Te Papa peninsula, PPC26 supports strategic aspirations towards live-work-play. The creation of walkable catchments around community infrastructure and employment supports increasing usage of non-car modes of transportation, such as walking and cycling. PPC26 provides the potential for better utilisation of existing transport corridors and greater uptake of public transport which is often correlated to greater densities of people.

3.6.4. Western Bay of Plenty District Plan

Under section 74(2)(c) of the RMA when changing a district plan, a territorial authority shall have regard to the extent to which the district plan needs to be consistent with the plans or proposed plans of adjacent territorial authorities.

Section 1.6 of the District Plan sets out cross boundary issues. It is recognised that the most significant boundary is with Tauranga City and this is reflected in the use of joint studies, regular contact on common issues and the preparation of the SmartGrowth Strategy.

Engagement has been undertaken with Western Bay of Plenty District Council on PPC26 and general support for PPC26 has been expressed. PPC26 is considered to be consistent with the Western Bay of Plenty District Plan.

3.6.5. Iwi management plans

Under section 74(2A) of the RMA a territorial authority, when changing a district plan, must take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority.

Within the jurisdiction of Tauranga City the following iwi management plans are relevant:

- (i) Tauranga Moana Iwi Management Plan (2016);
- (j) Ngati Kahu Hapū Environmental Management Plan (2011);
- (k) Ngai Te Ahi Hapū Management Plan (2013);
- (l) Te Mana Taiao O Ngai Tamarawaho Hapū Management Plan (2014);
- (m) Ngaiterangi Iwi Resource Management Plan (1995);
- (n) Ngai Tukairangi Ngati Tapu – Hapū Management Plan (2014);
- (o) Ngāti Pūkenga Iwi ki Tauranga Trust – Iwi Management Plan (2013);
- (p) Tapuika Environmental Management Plan (2014);
- (q) Waitaha Iwi Management Plan (2014);
- (r) Ngati Whakaue ki Maketu Hapū Management Plan (2018);
- (s) Nga Potiki Environmental Plan (2019).

The relevant parts of these management plans have been identified and commentary on how they have been taken into account through PPC26 is provided in Appendix 3.

Engagement has been undertaken with the Te Rangapu Mana Whenua O Tauranga Moana and Resource Management Unit representatives. This has been ongoing since early 2019 and has been through group hui, individual hui, presentations, Zoom, written material and draft provisions.

3.7. SmartGrowth Partnership

SmartGrowth was launched in 2004 and provides a unified vision, direction and voice for the Western Bay of Plenty. It is a collaboration between Tauranga City Council, Western Bay of Plenty District Council, BoPRC, Tangata Whenua, partner community/business organisations and key Governmental agencies - like the Waka Kotahi NZ Transport Agency and Bay of Plenty District Health Board.

The two key projects that have been progressed under the SmartGrowth partnership are the UFTI and the FDS. These are discussed further below.

3.7.1. Urban Form and Transport Initiative (UFTI)

The UFTI is a collaborative project led by SmartGrowth and Waka Kotahi NZ Transport Agency, and involves Western Bay of Plenty District Council, TCC, the BoPRC, iwi, and community leaders. UFTI is a coordinated and aligned approach across the sub-region on key issues, such as housing, transport and urban development.

UFTI builds on the works of previous plans such as the Tauranga Transport Plan, TUS and the FDS and aligns with both the Government Policy Statement and the Government's Urban Growth Agenda – which support the delivery of successful and highly liveable communities.

The UFTI final report was approved by the partner Councils in July 2020 and approved by the Waka Kotahi NZ Transport Agency Board in August 2020. This report sets out an integrated land use and transport programme called 'Connected Centres'. This will cater for approximately 200,000 additional people, 95,000 new homes over the next 30-70 years. The Connected Centres programme will guide future investment decisions and will be incorporated into a Western Bay of Plenty joint spatial plan. Over time, this programme will deliver greater housing and transport choices, improve and enable safe access to the sub-region's many social and economic opportunities, help reduce transport-related greenhouse gas emissions, move goods efficiently and reliably, contribute to more social and affordable housing, and manage environmental and cultural impacts often associated with unplanned growth.

There are two core concepts critical to the Connected Centres programme. The first is increasing the number of dwellings by intensifying our existing urban and new growth areas. This is to maximise the land available for development and support a well-functioning multimodal transport system. The second is being able to access local social and economic opportunities within a 15-minute journey time, and sub-regional social and economic opportunities within 30–45 minutes. These concepts encourage strong local centres and connected neighbourhoods.

In developing the Connected Centres programme, the SmartGrowth Partners started with a set of key design concepts. PPC26 addresses many of these design concepts¹³, particularly in Te Papa through enabling intensification around public transport, centres, employment, amenities and services. In addition, the Connected Centres programme has identified Cameron Road as a high frequency public transport corridor.¹⁴

Design concept 10 also seeks to intensify current urban areas to 30-50 dwellings per hectare, PPC26 enables greater densities and architectural testing has demonstrated that this level of density is enabled through the plan change.

¹³ P62-63, Urban Form and Transport Initiative (UFTI) Final Report, July 2020

¹⁴ P65, Urban Form and Transport Initiative (UFTI) Final Report, July 2020

The Connected Centres programme also identifies Otumoetai, Mount Maunganui and Arataki/Bayfair as areas for increased intensification. These areas are covered by PPC26 and provide for intensification through duplex dwellings and CDD within the existing building envelope requirements for the Suburban Residential Zone. Further intensification opportunities of these areas may be identified through additional spatial planning to inform the City Plan Review, due to be notified in 2024.

Table 8 of the report identifies a number of implementation principles for the Connected Centres Programme. It is considered that PPC26 aligns with these principles. The principles around good quality urban form and urban design and supporting public transport through increased density are particularly relevant.

A number of key moves or actions have been identified to deliver on the Connected Centres Programme. One of these is the completion of district plan changes to support city intensification within the next five years. PPC26 delivers on this.

3.7.2. Proposed SmartGrowth Future Development Strategy 2018 (FDS)

A future development strategy is required by the NPS-UD 2020. This is the continuation of the work that SmartGrowth has been doing since the launch of the first SmartGrowth Strategy in 2004.

The FDS outlines how the partnership will provide for sufficient development capacity to meet demand for the next 30 years. The FDS is aligned with the TUS which sets out Council's strategic direction for responding to growth through a future spatial urban form that will provide for future growth.

The FDS was publicly consulted on in 2018 and considered growth characteristics over the next 30 years for the land area from Waihi Beach to Pukehina, with particular focus on growth in and around Tauranga City.

The FDS identifies the following issues:

- (a) Aligned growth and infrastructure;
- (b) Dealing with uncertainty;
- (c) Growth funding;
- (d) The impacts of growth;
- (e) Housing affordability;
- (f) Changing demographics;
- (g) Development trade-offs.

The FDS identifies minimum targets for housing development capacity in Tauranga City, these have also been incorporated into the RPS and Section 2A.3 of the City Plan as required by the NPS-UDC (now NPS-UD).

Geographical Area	Medium Term July 2018- June 2028*	Long Term July 2028 – June 2048*	30 Year Total July 2018 – June 2048
Tauranga City	16,500	25,500	42,000

*The medium term target includes an additional margin of 20% capacity and 15% for the long term target.

The FDS and Housing and Business Development Capacity Assessment completed 2017¹⁵ identified that in the short term (2017-2020) sufficient development capacity was available. However, in the medium and long term there was not enough capacity. On advice from staff and the development community that housing supply was constrained in the short term, an independent review of housing capacity was commissioned in 2019 which identified a short and medium term shortfall in housing capacity¹⁶. Undertaking a plan change to enable greater intensification of existing urban areas was identified as one way of addressing the shortfall in capacity.

The FDS also recognises that in 2018 in Tauranga City 85% of growth was being accommodated in greenfield urban growth areas. Three greenfield vs urban infill scenarios are provided on page 47. It was noted that an unallocated portion of growth needs to be allocated to either greenfield development or alternatively through development within the existing urban area. This is likely to be somewhere between 25-75% as a proportion of total growth.

The FDS sets out that the sub-region will provide for urban growth in two ways. Through a compact city approach of providing for development in the existing urban area of Tauranga City and through new growth areas.

Page 31 of the FDS identifies the compact city work programme. In the short term (2018-2021) two plan changes were identified. Firstly, an objectives and policies plan change to provide greater policy support for intensification within the existing urban area. Secondly, a review of the City Living Zone to ensure no unintended barriers to medium-density housing. A summary of how these plan changes have evolved is included in Section 4 of this report however in summary PPC26 fulfils both purposes and goes beyond this scope. The Te Papa Spatial Plan was also identified as a project that would build on and improve the live/learn/work/play opportunities and find opportunities to enable more homes supported by amenity and infrastructure improvements.

In the medium to long term the full City Plan Review was identified as a significant opportunity to implement the TUS across the wider city.

3.8. Tauranga City strategies and policies

3.8.1. Proposed Tauranga Urban Strategy 2050 (TUS)

The TUS sets out Council's strategic direction for responding to growth through a future spatial urban form that will provide for future growth focused on enabling more housing choice close to jobs, services and public transport. It signals Council's intent to advance a more balanced approach to growth that emphasises growth in existing urban areas, complemented by growth in well planned greenfield areas.

The draft TUS was endorsed by CTC on 5 December 2017. In early 2018, engagement was undertaken on the TUS with a wide range of stakeholders and the public. There was strong, supportive feedback that in the main reinforced the intent of the TUS to enable a greater proportion of residential growth within Tauranga's existing urban area, with a specific focus in and around existing town centres.

In addition, an external Urban Strategy Advisory Group was established with the purpose of providing insight and guidance to the revision of the TUS until its finalisation. The Advisory Group included representatives from the Tangata Whenua Collective, Priority One, District Health Board, Western Bay of Plenty District Council, BoPRC, the SmartGrowth Property Developers and Housing

¹⁵ https://www.smartgrowthbop.org.nz/media/2094/smartgrowth-nps-udc-housing-and-business-capacity-assessment-2017_final-for-sg-website.pdf

¹⁶ Tauranga City Council: Western Bay Sub-Region Residential Development Capacity Review, Veros Property Services, May 2019

Affordability Forums. The TUS was revised following feedback from stakeholders, the community and the external Advisory Group.

The TUS is complemented by the FDS which considers how growth is managed over the wider western Bay of Plenty. The TUS informed the FDS.

The TUS proposes a centres-based urban form which will include areas of residential intensification in and around town centres. This will enable more people to live within easy walking distance to efficient public transport, shops, community facilities, employment, and public amenity. A change to the City Plan was identified as a key method of delivering on residential intensification, this has evolved into PPC26.

3.8.2. Te Papa Spatial Plan

With the TUS setting the strategic direction to enable more housing close to jobs, services and public transport. TCC sought to identify appropriate areas of the city which would be appropriate to prepare spatial plans.

Through an initial city-wide assessment in 2018, Council considered that the Te Papa peninsula was the most appropriate location to prepare the first spatial plan for the city for the following reasons:

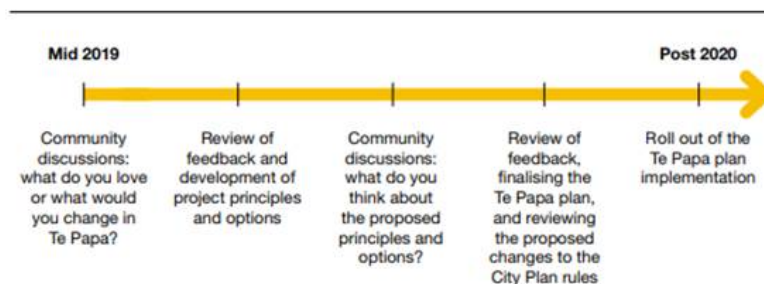
- (a) Significant employment hubs are located along this corridor around the CBD, 11th Ave, Tauranga Hospital/Gate Pa and Greerton;
- (b) More frequent bus services will run along this corridor and these will become more frequent with implementation of the new Public Transport network blueprint;
- (c) Planning is underway for the delivery of infrastructure for bus lanes and bus priority along Cameron Road as well as safe off-road cycle paths;
- (d) A number of primary, intermediate and secondary schools as well as tertiary education facilities are located along the corridor;
- (e) Significant areas of concentrated social housing stock exist in common ownership, with redevelopment interest expressed;
- (f) No significant infrastructure constraints are evident in the short to medium term;
- (g) The area is largely resilient from natural hazard risk, especially risk associated with sea level rise, groundwater, storm surge and tsunami in comparison to other areas of Tauranga.

On 5 June 2018, CTC resolved to progress with the preparation of a master spatial planning exercise for the area as part of the implementation program for the TUS. It was considered that this approach would allow for Council to comprehensively assess the peninsula from the CBD in the north to Greerton in the south, and the centres in between along Cameron Road. This would enable a full assessment of infrastructure capacity, community amenities and investment to be considered and assist in the development of business cases for large-scale transformational infrastructure investment, such as enhanced public transport.

It was considered that this process would prepare a blueprint for growth within the Te Papa peninsula. The aim of the blueprint was to provide a 30-year plan for greater housing choice, safe and efficient transport options, local amenities and infrastructure needed to support healthy and connected neighbourhoods and communities. PPC26 takes the residential land use component of the Te Papa Spatial Plan and implements it through the City Plan. For more detailed information on how the land use component of the Te Papa Spatial Plan has been applied through consideration of the Te Papa Housing Overlay is provided in Appendix 7.

Summary of Te Papa engagement –April 2019 until June 2020

In preparing the Te Papa Spatial Plan, undertaking engagement with the community was a key aspect of the project. There were a number of stages of engagement that was undertaken on the Te Papa project as shown in the diagram below:



The process for engagement sought to undertake community engagement on what the community valued about Te Papa, what wasn't working for them and what they would like to improve in the future. This information was developed into a report and informed the Design Sprint process.

Following the Design Sprint, between 7 April and 19 May, further community and stakeholder engagement was undertaken for feedback on proposed ideas, potential projects and initiatives to support growth in the Te Papa peninsula. This feedback was collated and analysed to inform the prioritisation of ideas for the final Te Papa Spatial Plan. There was general overall support for the ideas, projects and initiatives identified and the need to take a coordinated, comprehensive and integrated approach.

3.8.3. Residential Outcomes Framework (ROF)

The ROF provides urban design guidance for new multi-unit residential development in Tauranga. The outcomes and guidelines described in the framework are intended to be used by applicants, developers and TCC staff in the design and review of resource consent applications for higher density residential development to support high quality residential outcomes. The framework has been informed by the TUS, FDS, Tauranga Moana Principles, the City Plan, existing medium density guidance and national and international best practise.

The ROF outlines eight key outcomes which are accompanied by visual and written guidelines to assist in demonstrating how each outcome might be achieved. The outcomes are:

- (a) Site and Context;
- (b) Public Domain Interface;
- (c) Movement Networks;
- (d) Private Residential Amenity;
- (e) Residential Interface;
- (f) Safety and Security;
- (g) Choice, Resilience and Flexibility;
- (h) Sustainability.

Consideration was given to how the design guideline should be applied and whether the document should have statutory weighting. It was considered that to deliver good design outcomes, whilst also allowing for flexibility for developers, the ROF remains a non-statutory document but the identified outcomes are pulled through to the objectives, policies and assessment criteria for CDD and duplex dwelling.

This approach acknowledges that every application will be different and not all the design guidelines will be relevant to each proposed development. It is expected that all multi-unit development

applications will be able to achieve the overall intent of the desired outcomes, with a degree of flexibility in relation to how this is achieved. A copy of the ROF is attached as Appendix 16.

4. Development of the proposed plan change

This section describes how the proposed plan change was developed over time.

In 2017, community engagement on both the Tauranga Transport Programme and the Environment Strategy provided strong feedback that Tauranga needed to move towards a more compact city as a way to address environmental concerns and to address transport issues.

Subsequently, the first draft of the TUS was completed, and engagement was undertaken in early 2018 with the community, Tangata Whenua and key stakeholders. This engagement identified that there was overall support for a move towards a more compact city, greater housing choice, improved active transport, improved congestion and public transport and creating a sense of place.

At the same time, the FDS was developed as a requirement of the NPS-UDC. The FDS outlines how sufficient development capacity will be provided to meet demand for the next 30 years for the area from Waihi Beach to Pukehina, with particular focus on growth in and around Tauranga City.

Given the inter-relationship of the two strategies, both the TUS and FDS were consulted on over the same time period at the end of 2018.

The TUS identified a number of implementation actions. One of the key actions identified was the development of a Te Papa Spatial Plan that would then inform changes to the City Plan.¹⁷ A number of other actions were also identified. Of relevance to PPC26, three short term actions were identified;

- (a) An objectives and policies plan change to give greater support, clarity for developments that allow more homes within the existing urban areas;
- (b) A City Living Zone plan change to better align rules to support development opportunities for more intensive residential development close to the City Centre; and
- (c) A plan change to address water based hazard management (PPC27)¹⁸;
- (d) A Spatial Framework across the Te Papa peninsula to identify opportunities to build on and improve the live/learn/work/play opportunities in this part of the city. This will include identifying locations where more housing may be enabled, while also identifying improvements needed across the peninsula.

These actions were also identified in the FDS.¹⁹

In March 2019, it was identified that the objective and policy plan change should be broadened to include amendments beyond just the policy framework. It was recognised that in order to enable further opportunity for housing development, that amendments to the objectives and policies alone would not enable sufficient opportunities and changes would also need to be made to the rules in the City Plan.

In July 2019 UFTD meeting, it was noted that the extent of the two plan changes included:

- (a) Duplexes and low rise comprehensive development provisions widely across the city; and
- (b) Medium rise comprehensive development provisions limited to the Te Papa peninsula, aligning with the Te Papa Spatial Plan.

¹⁷ Page 52, Proposed Tauranga Urban Strategy 2050

¹⁸ Page 65, Proposed Tauranga Urban Strategy 2050

¹⁹ Page 29, Proposed SmartGrowth Future Development Strategy

These plan changes actions continued to evolve as further engagement, technical assessments and planning work was undertaken and although initially identified as two plan changes, they have now been combined into PPC26. An outline of Council resolutions relevant to PPC26 and the Te Papa Spatial Plan is provided in Appendix 11.

There are a number of matters that influenced the broadening of the scope of PPC26.

In 2018 the Ministry for the Environment engaged Beca Limited to prepare a report that reviewed and analysed key urban zoning provisions within district plans for selected 'high growth' Councils. The purpose of the report was to investigate the extent to which those district plan provisions either enable or constrain urban growth and intensification to occur. Tauranga was identified as having the oldest operative plan of the high growth Councils (formulated during 2008-2010 and became operative in 2014). Given that the NPS-UDC came into effect after the plan became operative, it identified that the NPS-UDC was not given effect to in the development of the City Plan. It was considered that the provisions of the key urban zones do not explicitly seek or enable the promotion of quality built environments and delivery of housing at different price points. It was identified that the City Centre Zone and Commercial Zone are highly enabling, but despite this still had a lack of uptake. The report considered that this was likely due to low market demand. The authors also considered that the ready supply of available and zoned greenfield land appears to have undermined the policy intent.²⁰

This research identified that the Tauranga City Plan:

- (a) Does not provide the delivery of quality built environments or a range of housing types at different price points;
- (b) The limited extent of the City Living Zone appears to strongly undermine the ability of the zone to make an impact on delivering a range of housing types at different price points;
- (c) There are few mechanisms to deliver quality built environments within existing provisions;
- (d) Has objectives and policies (typical of older district plans) that do not provide a strong enabling framework and seeks to deliver 'status quo' urban outcomes based on detached dwellings.

The report stated that 'activity status has not been creatively used to encourage increased housing densities...', meaning the City Plan is not able to be outcome-focused and market-aware about developer response to particular activity status and provisions. Exclusions from notification have not been extensively used, and do not form an implementation tool to achieve housing outcomes. Density controls favour ensuring minimum amenity levels in new and existing neighbourhoods are retained.

In addition to the findings of the above report, the removal in 2019 of the ability to submit new special housing area applications under the HASHAA prevented further opportunities for providing housing capacity through this mechanism. Delivery of the special housing areas approved between 2013 and 2019 under this legislation provided capacity for over 3200 new homes. However, this mechanism is no longer available for providing further housing capacity.

Also, in March 2019, the Development Capacity report to UFTD Committee (12/03/2019) that included the Tauranga Housing Accord Monitoring Report to 31 August 2018 and subsequent report 'Western Bay Sub-Region Residential Development Capacity Review' undertaken by Veros identified issues with residential development capacity in the medium term. The 'Western Bay Sub-Region Residential Development Capacity Review' report provided an independent assessment of remaining capacity for new subdivision and housing in the Western Bay sub-region and looked at whether remaining capacity was sufficient to meet current and projected growth rates until new capacity is enabled. The review focused on Tauranga City. For the Western Bay District, an assessment of Omokoroa, Katikati and Te Puke was undertaken, primarily to determine whether any

²⁰ Enabling Growth – Urban Zones Research: Key Observations, Findings and Recommendations, Beca Limited, 2018

potential short-term capacity shortfall in Tauranga could be accommodated by transferring more growth into the Western Bay District. The review indicated that only 18 months of feasible residential development capacity was available.²¹

In 2019 Beca was engaged by the Council to undertake a section 35 efficiency and effectiveness assessment / gap analysis for the residential provisions of the City Plan²². It was observed that the objectives and policies for the Suburban Residential Zone, through focusing on the maintenance of the existing low-density character, supported the status quo and did not provide an enabling framework for greater density. The emphasis on 'present state' and 'built form amenity' is coupled with an absence of a clearly described 'future amenity'. Similarly, the City Living Zone objectives and policies sought to balance character and amenity of existing neighbourhoods against the intended delivery of higher density forms of housing.

Assessment matters in the City Plan were identified as being zone-based rather than topic-based, resulting in repetition. It was also considered that there was a lack of focus on housing supply, affordability, or promotion of housing type diversity.

Key stakeholder, Tangata Whenua and community engagement was undertaken alongside the development of PPC26. Key stakeholder and Tangata Whenua engagement began in early 2019 and has continued right through until public notification. Broader community engagement began on PPC26 in August 2019 as part of the Te Papa Spatial Plan engagement. This was followed by the inclusion of a flyer and video in the city-wide rates mailout in early 2020 as part of awareness raising of PPC26. In April and May 2020, feedback was sought on draft provisions via an online survey, written feedback and one-on-one meetings. The feedback received through this engagement was generally positive with some specific amendments being sought to provisions. The feedback received has been taken into account in the development of PPC26. Section 5 provides further information on the engagement undertaken for PPC26.

Technical assessments have also been undertaken to support and inform PPC26. These include; a development capacity assessment (Appendix 5), financial and architectural testing of provisions (Appendix 6), infrastructure modelling and analysis (Appendix 9), and natural hazard risk assessment (Appendix 1). Findings of these assessments have been pulled through to the options analysis where relevant.

4.1. Approach of Operative City Plan

The City Plan became operative in full on the 5 July 2014, with the Plan primarily being developed over 2008-2010. It is noteworthy that the timeframes for the development of the City Plan precedes central government direction on Urban Growth that currently exists. The NPS-UDC was gazetted in 2016 and subsequently TCC developed the Proposed TUS which then informed the FDS. It is therefore unsurprising that the City Plan is lacking in terms enabling residential intensification in existing urban areas. This was also identified in the two Beca reports undertaken in 2018 and 2019.²³ The s35 monitoring report is attached in Appendix 4.

The implementation of the City Plan has resulted in low-density residential development in the Suburban Residential Zone, with a focus on maintaining 'appropriate' amenity levels and existing residential character. No plan changes or review of the residential provisions of this nature, has been undertaken since the last City Plan review that commenced in 2008.

²¹ Western Bay Sub-Region Residential Development Capacity Review, Veros Property Services, May 2019

²² 'Tauranga City Plan – Section 35 reporting/gap analysis' (Beca, 2019)

²³ Enabling Growth – Urban Zones Research: Key Observations, Findings and Recommendations, Beca Limited, 2018 and Tauranga City Plan – Section 35 reporting/gap analysis' (Beca, 2019)

The City Living Zone objectives and policies also reflect a 'balancing' approach with the intended delivery of higher density forms of housing considered against maintaining character and amenity of neighbourhoods. The framework is not strongly enabling of higher density forms of residential activity and there has been minimal uptake in this area.

It has been identified, primarily through the Beca work, that the current framework does not sufficiently provide for the City's ongoing high rate of population growth or effective use of the land resource. The need for PPC26 has been identified through the assessed undersupply of feasible residential capacity, with PPC26 providing a response to identified existing residential capacity constraints.

Below is a brief overview of the approach that the City Plan currently takes to residential intensification.

4.1.1. Residential Activities

The City Plan provides for a range of residential zones, ranging from high density developments with some provision for high rise development, residential activities in commercial centres including the City Centre, medium density development, traditional low-density suburbs, and a specific area for large lot residential development.

Residential activities are permitted in the City Centre Zone with no maximum density requirements providing it is separated from any street frontage by retail or office activities. Height limits enable up to 49m.

The High Density Residential Zone provides for high density development at the western end of Mount Maunganui, adjacent to the downtown shopping area, the beach, harbour and recreational amenities. This zone provides for a maximum density of 1 Independent dwelling unit per 100m² of gross site area. This zone also identifies a High Rise Plan Area, with the same density but provides for high rise development opportunities, subject to additional controls that relate building bulk and scale to views to and from Mauao (Mount Maunganui) and Hopukioire (Mount Drury).

A Medium Rise Plan Area is applied in distinct locations within the Wairakei Residential Zone and Suburban Residential Zone. The Medium Rise Plan Areas provide a greater scale and density than that provided for in the underlying zone.

In addition to existing urban areas, two large greenfield areas have been identified to provide for future residential growth in the medium to long term (Te Tumu and Tauriko West). However, these areas are yet to be zoned and are subject to existing structure planning which are currently underway.

The three zones subject to PPC26 are discussed in further detail below.

4.1.2. Suburban Residential Zone

The City Plan outlines that the purpose of the Suburban Residential Zone is to provide low density suburban residential development of generally one to two storey detached dwellings. The objectives and policies for this zone seek the provision of residential amenity consistent with existing and anticipated residential character. Development is therefore characterised by space around buildings, on-site open space, provision of sunlight and privacy. The rule framework promotes a high ratio of on-site open space to building, and an expectation of a high level of private on-site amenity, which is controlled in part through regulating site coverage and minimum outdoor living requirements. The framework has resulted in primarily standalone dwellings being developed.

Provision is made, through the resource consent process on a discretionary basis, for medium density developments in the Suburban Residential Zone subject to specific criteria based on location, amenity, character and other effects of higher density development on the Suburban Residential

Zone. This zone also includes specific provisions for secondary independent dwelling units and retirement villages.

4.1.3. City Living Zone

The City Living Zone comprises City Living Residential and City Living Mixed Use. The purpose of the City Living Zone is to provide site redevelopment opportunities primarily for the development of intensive, multi-level housing and some mixed use in the established residential areas around the Tauranga City centre, generally these are expected to be on larger or amalgamated sites, although there is some provision for redevelopment of smaller, existing sites.

A more urban landscape character is anticipated, with medium density residential development to be comprehensively designed and consistent with the anticipated amenity for the zone. The rule framework makes allowance for greater building height in parts of the zone and greater density, particularly where larger sites are proposed to be developed. A comprehensively designed development can be considered on a restricted discretionary and non-notified basis, subject to compliance with development criteria.

4.1.4. Commercial Zones

The Commercial Zone provides for a broad spectrum of uses and scale of activities. Residential activities are provided for and intended to be integrated with commercial development. Design and construction measures are required to ensure that legitimate environmental effects of non-residential activities are managed to mitigate effects on residential activities, and that the commercial viability of the zone is not compromised.

It is expected that residential activity will form part of the mixed use of a site, with medium to high residential densities, separated from any street frontage by retail or office activities and above ground floor. Density of residential activity is based on gross site area in the Commercial Zone at 1 independent dwelling unit/50m², with the rule framework differentiating from the City Centre Zone (where no maximum density of development for residential activity exists).

5. Consultation and engagement

Schedule 1, clause 3(1)(a) and (b) requires consultation with the Minister for the Environment and other affected Ministers of the Crown. An email has been sent to the Minister for the Environment, Minister for Housing and Minister for Urban Development. Subsequent correspondence and virtual meetings have been undertaken with representatives from the Ministry for the Environment and Ministry for Housing and Urban Development.

Consultation and engagement started more generally in 2017 through the Tauranga Transport Programme and the Environment Strategy. Through this engagement process there was strong feedback that Tauranga needed to move towards a more compact city. Following on from this the first draft of the TUS was completed and engagement was undertaken in early 2018 with the community, key stakeholders and Tangata Whenua. This engagement identified that there was overall support for a move towards a more compact city, greater housing choice, improved active transport, improved congestion and public transport and creating a sense of place. The TUS and FDS were further consulted on in late 2018. This early engagement, undertaken as part of other processes, paved the way for more specific engagement on PPC26 which began in early 2019.

It should also be recognised that significant engagement has been undertaken as part of the development of the Te Papa Spatial Plan and this has also informed PPC26. The wider 'growth story' has been told in parallel to engagement on both the Te Papa Spatial Plan and PPC26 with both webpages reflecting aligned key messaging around growth. Engagement on the Te Papa Spatial Plan is discussed further in section 3.8.2.1 above.

5.1. Iwi and hapū

Engagement on PPC26 and the Te Papa Spatial Plan has been ongoing since early 2019 with representatives of individual iwi and hapū and Te Rangapū Mana Whenua o Tauranga Moana Partnership (formerly the Tauranga Moana Tangata Whenua Collective). This engagement included workshops, hui (both as a group and individual hapū/iwi), presentations, the provision of written material such as overview documents and draft provisions. Appendix 10a contains a record of engagement undertaken with iwi and hapū.

Generally, feedback has identified the opportunity to provide for housing choice on Maori owned land, housing affordability, ensuring infrastructure capacity, protecting viewshafts and the implementation of the Tauranga Moana Principles. This feedback, and how they are proposed to be addressed is discussed further in the report contained in Appendix 10b.

For the Te Papa project, a specific mana whenua representative group has been set up. Engagement, including regular hui and other project wananga (workshops), has taken place since October 2019 through to September 2020. This includes representatives from: Ngāi Tamarāwaho, Ngāti Tapu, Ngāti Te Ahi, Ngāti Ruahine and Ngāti He.

Mana whenua representatives were involved in the design sprint option development early in the process and will contribute towards the development of cultural outcomes and principles to be included within the Te Papa Spatial Plan. These outcomes and principles will assist in guiding ongoing engagement and partnership with mana whenua on future projects along the peninsula. Appendix 10a contains a record of engagement undertaken with iwi and hapū as part of the Te Papa Spatial Plan.

5.2. Key stakeholders

Key stakeholder engagement on residential intensification was initiated as part of the development of the TUS and has been ongoing until the point of notification. Engagement has taken the form of individual meetings, workshops, presentations and the circulation of overview documents and draft provisions.

Key stakeholders have included, members of Housing Affordability Forum, members of Property Developers Forum (SmartGrowth Forums), Western Bay of Plenty District Council, BoPRC, Waka Kotahi NZ Transport Agency, Heritage New Zealand, social housing providers, New Zealand Planners Institute, New Zealand Institute of Architects, Property Council New Zealand, central government agencies, group builders and local developers.

Engagement was initially around the need for PPC26 (including implementation of the land use component of the Te Papa Spatial Plan), the key drivers and the broad approach to the provisions. From March to July 2020, once provisions had been drafted, more specific engagement was undertaken on the content of the provisions and written feedback on the draft provisions was sought. Through this process, general support was expressed for PPC26.

There were key themes that required further consideration by staff and two key matters that were taken to the UFTD Committee on 21 July 2020 to seek direction on the Te Papa Housing Overlay geographic extent and the built form options for PPC26.

The first key theme was the extent of the Te Papa Housing Overlay to enable increased height (4-6 storeys) through PPC26 and identified in the Te Papa Spatial Plan. In particular, feedback suggested that Merivale should be included within the Te Papa Housing Overlay. Staff recommendation was supported to identify Merivale for future inclusion in the housing choice area of the Te Papa Spatial Plan to be considered for increased height through the City Plan Review, with further programme development and required investment to be identified in the meantime. This would allow for additional time to consider appropriate funding to support the community for the future and increase the suitability in terms of access to amenities, public transport and commercial centres.

The second key theme was to provide for detached dwellings on smaller sites. This is additional to duplex dwellings as proposed through PPC26. Staff recommendation was supported to provide for duplex dwellings on 400m² site as a permitted activity and for two or more detached dwellings or three or more attached dwellings on a site as a CDD as a restricted discretionary activity (non-notified). This approach provides greater certainty for applicants around what will be assessed rather than a discretionary activity status whilst providing the ability to assess every application to ensure that the outcomes are appropriate.

Appendix 10c contains further information on engagement undertaken with key stakeholders in April and May 2020.

5.3. Community

As noted above, consultation and engagement has been undertaken for various projects that led to the identification of PPC26 as an implementation action. This engagement began in 2017.

More specific community engagement on PPC26 began in August 2019 in parallel to the Te Papa Spatial Plan values engagement, however the focus was primarily on the Te Papa peninsula. This engagement included a multi-channel approach to engage with the wider community including Council-run public information sessions, engagement with schools along the peninsula, community-based events including local Farmer's Markets, multicultural events and a family event in Anzac Park, in-depth interviews, and print, digital and social media advertising. An online survey gave the community the opportunity to tell Council what they valued and what they would like to see change in the neighbourhoods where they lived, worked and played. The outcomes of this engagement and progression of the Te Papa Spatial Plan informed PPC26 and particularly location of the Te Papa Housing Overlay as discussed in further detail in Appendix 7.

Following on from this, in early 2020 a flyer and video was included with the city-wide quarterly rates mail out that introduced the housing choice plan change. The video was also displayed across Council facilities and online.

In April and May 2020 a second stage of engagement was undertaken. This sought to involve the community in both the Te Papa Plan and PPC26 and to ensure knowledge about the interlinked projects was as widely spread as possible. The engagement sought to provide people across Tauranga with an opportunity to give feedback on ideas for supporting growth in Te Papa, and on proposed changes to the City Plan to enable more housing choice. This was part of pre-consultation and not a formal consultation process under the RMA.

Unfortunately, in COVID-19 Alert Level 4 and 3 staff were not able to meet the community face-to-face to talk about how we can shape the future of our city, neighbourhoods and homes. Therefore, between 7 April and 19 May 2020 a wide range of other ways was provided for people to provide their feedback and to get in touch or learn more about the projects. To ensure the project reaches all audiences, online engagement was supported by elements that target older audiences and audiences that are not online savvy, such as radio advertising, free community paper and newspaper advertising, as well as phone-in opportunities to speak to a member of the team to supplement the lack of face-to-face engagement. We also had follow up workshops on feedback received.

Community engagement was undertaken in the latter part of 2019 to inform about the project and understand the values and attributes associated with Te Papa, from a community and stakeholder perspective. Targeted engagement was undertaken, including meetings with identified top 30 stakeholders, as well as iwi groups, schools in the Te Papa region, workshops and public engagement sessions, social media reach and an online survey. The Te Papa workstream is progressing concurrently with PPC26.

Throughout the development of the Te Papa Spatial Plan and PPC26 from mid-2019 until public notification, ongoing opportunities to keep stakeholders and the community informed about the

projects were provided. This included regular e-newsletters, meetings with stakeholders and detailed information on the website.

Appendix 10c contains further information on engagement undertaken with the community in April and May 2020.

5.4. Council Meetings

PPC26 has been progressed in conjunction with the Te Papa Spatial Plan, and in alignment with the direction of the TUS and the FDS. Specific discussion of progressing the plan change and the Te Papa Spatial Plan commenced with Councillors through the implementation of the TUS in early 2018 and has continued right up until October 2020.

Appendix 11 contains a record of workshops and reports, primarily presented to the CTC and UFTD Committees seeking resolutions. In addition to these, progress on PPC26 was also provided through quarterly updates. These reports were presented in public open meetings with live and recorded screening options available to the public.

6. Natural Hazards

As outlined in Section 3.5, PPC26 is required to give effect to the RPS and in particular the consideration of natural hazards through Objective 31 and suite of policies.

To ensure appropriate implementation of the natural hazard provisions of the RPS, TCC engaged with the BoPRC on PPC26. This began at the initiation of the proposed plan change. Further engagement on key steps involved in this project were also undertaken and particularly the key hazards that were considered applicable to PPC26. This correspondence is provided in Appendix 1e.

A natural hazards assessment is attached in Appendix 1 which examines PPC26's objectives against the relevant natural hazard provisions of the RPS and demonstrates how the proposed plan change will give effect to these provisions. This assessment also includes the technical documents that input into the city-wide natural hazards assessment to give effect to the objectives and policies of the RPS, and therefore how natural hazard risk reduction is achieved.

The assessment covers the following:

- (a) Purpose of the proposed Plan Change;
- (b) The RMA and the NZCPS;
- (c) Role of the RPS, and specifically the objective and policy framework relating to natural hazards;
- (d) Identification of key natural hazard policies of the RPS and the relevance to the proposed plan change;
- (e) Risk assessment process, and how this was undertaken;
- (f) Outcome of risk assessment (overall), and specifically to the proposed plan change;
- (g) Policy assessment;
- (h) How the proposed plan change will be implemented (map versus rules);
 - (i) Future plan changes, to give effect to the RPS (i.e. the City Plan Review); and
 - (ii) How the overall RPS natural hazard policy framework is satisfied.

To further support this overall assessment, and to appropriately summarise the RPS policy approach and risk assessment outcomes, a summary table of the entire approach that has been undertaken is outlined in Appendix 1e. This includes the relevant steps and outcomes under the Appendix L methodology described in the RPS.

This assessment concludes that PPC26 gives effects to the natural hazard objective within the RPS by setting exclusions of where the proposed plan change will apply. Particularly areas subject to three hazards (erosion, inundation and liquefaction/lateral spread) will be excluded from the proposed plan change. By doing so, a precautionary approach via an avoidance risk management measure is implemented. Flooding will be addressed through a rule framework in PPC27.

This assessment should be read in conjunction with Appendix 2a which provides an overall assessment against the RPS.

7. Methodology and approach to evaluation

7.1. Scale and significance

Under section 32(1)(c) of the RMA, this evaluation report needs to:

contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

The following scale and significance assessment discuss PPC26 in terms of eight factors, and scores each high, medium or low.

The assessment concludes with a summary and a final overall score for the scale and significance of PPC26.

Criteria	Matters for consideration	Comments	Score
Reasons for the change.	<ul style="list-style-type: none"> Giving effect to a higher order document; Implementation non-statutory planning initiative; Initiated locally because of plan effectiveness monitoring, community reaction to resource use etc. 	<p>The reasons for the change are:</p> <ul style="list-style-type: none"> To give effect to the NPS-UD; To achieve outcomes sought in the TUS, FDS and UFTI; To assist with achieving development capacity targets set out in the RPS and City Plan (2A.3); To provide a more enabling rule framework that supports urban growth and intensification; To enable further development of the existing urban area to provide for greater residential capacity and housing choice. 	High
Degree of shift from the current approach.	<ul style="list-style-type: none"> Addressing existing or new resource management issue; Proposing a new management regime/minor or major change in rule framework; Extent and scale of regulatory impact; Degree of 'Packaging' with other plan changes or other interventions; Discrete provisions, or broader suite of existing provisions; Changing existing plan objectives, and to what degree. 	<p>Issue 2A.2.5 Population Growth of the existing City Plan is still relevant. However, since this issue was identified as part of the previous plan review, population and housing pressures have increased. Subsequently it has been identified that a new planning framework is required to more effectively address this issue.</p> <p>PPC26 will more effectively and efficiently address this issue through enabling greater residential development capacity and housing choice within existing urban areas. This is achieved through a policy change for the Suburban Residential Zone, more significantly in the Te Papa Housing Overlay.</p> <p>PPC26 is also directly linked to PPC27 which seeks to reduce the risk of flooding to life, property and infrastructure from intense rainfall events in Tauranga over time. The RPS requires that natural hazard risk needs to be assessed and managed before development occurs. PPC26 relies on the risk assessment undertaken and rule framework developed through PPC27 to meet the RPS natural hazard outcomes for flooding from intense rainfall.</p>	Medium
Who and how many will be affected?	<ul style="list-style-type: none"> Degree of public interest and engagement in issue; Degree to which proposal will address identified community outcomes; 	Large parts of the Suburban Residential Zone and all of the City Living Zone and Commercial Zone are affected (excluding areas identified for their high natural hazard risk).	High

Criteria	Matters for consideration	Comments	Score
	<ul style="list-style-type: none"> How many will be affected? Single landowner/multiple landowners/occupiers/ neighbourhoods/businesses/cities/future generations; Degree of impact on private property. 	These zones cover large areas of Tauranga City and therefore neighbourhoods and the future direction of the Suburban Residential Zone especially will change.	
Degree of impact on, or interest from iwi/Māori.	<ul style="list-style-type: none"> Level of interest from iwi/Māori engagement with iwi on the issue; Likely degree of impact on iwi/hapū? Impact on sites, areas or resources of significance to iwi/Māori; Degree of consistency with iwi management plans. 	<p>There has been ongoing engagement with tangata whenua since early 2019 on the proposed plan change. Issues identified are, for the most part, outside of the scope of the plan change, and are better addressed through the full City Plan Review. However, issues around viewshafts, infrastructure capacity and the Tauranga Moana Design Principles have been addressed through the development of PPC26.</p> <p>Further detail of tangata whenua engagement is contained in section 5 and Appendix 10a and 10b. An assessment against iwi management plans has also been undertaken and is contained in Appendix 3 and it is considered that there is general alignment with the iwi management plans.</p> <p>It is considered that there is little impact on sites of significant to Tangata Whenua as there are no proposed changes to Significant Maori Areas, Significant Archaeological Areas and viewshafts as a result of the plan change.</p>	Low
When will effects occur?	<ul style="list-style-type: none"> Temporarily (weeks or months); For the next 1–5 years; Ongoing into the future. 	<p>The effects of PPC26 will be ongoing into the future.</p> <p>Financial and feasibility testing has indicated that, due to a number of factors many of which are outside of the Council's control, uptake is expected to be slow and over a long period of time (full reports attached as Appendix 5 and 6).</p>	High
Geographic scale of impacts.	<ul style="list-style-type: none"> Very localised or wide ranging (ie, single site/whole zones/one or more regions/single or multiple natural resources). 	PPC26 is considered to be wide ranging across multiple zones that cover large areas of Tauranga City. The zones within the scope of the plan change are Suburban Residential, City Living and Commercial. Excluding areas identified for their high natural hazard risk as identified in Appendix 1.	High

Criteria	Matters for consideration	Comments	Score
Type of effect.	<ul style="list-style-type: none"> Acute/chronic/temporary/cumulative/positive/negative/irreversible; Likelihood and consequence (e.g., low probability, high consequence); Part(s) of environment affected (ecosystems, infrastructure, amenity); Degree of impact on social, cultural or economic well-being; Degree of impact (positive/negative) on Part 2 matters. 	<p>PPC26 will have ongoing positive effects in terms of enabling further housing capacity and housing variety. This will have positive effects on social and economic well-being.</p> <p>PPC26 is consistent and meets Part 2 matters of the RMA.</p>	Medium
Degree of policy risk, implementation risk, or uncertainty.	<ul style="list-style-type: none"> Community reaction; Whether: <ul style="list-style-type: none"> Novel, untested approach; Weak evidence base; Highly uncertain benefits and costs; Dependent on other initiatives (such as non-RMA mechanisms); Challenging implementation timeframes. 	<p>The general approach to be applied has been well tested in other high growth councils such as Hamilton and Auckland.</p> <p>Given that the City Plan is about to be reviewed, with notification in 2024, this provides an opportunity to implement PPC26 and monitor it closely to determine if further changes need to be made through the City Plan Review.</p>	Low
Summary.			
The above assessment concludes that the scale and significance of PPC26 is medium-high.			Medium- High

7.2. Quantification

Section 32(2)(b) requires that if practicable, the benefits and costs of a proposal are quantified. Given the medium-high scale and significance of the proposal, significant work has been undertaken to understand the impacts of the proposed plan change and to shape the provisions. This includes, but is not limited to, development capacity assessment, financial feasibility and architectural testing and infrastructure modelling. However, it would be costly and time consuming to quantify all benefits and costs of the proposal. There are many social benefits to the proposed plan change that are difficult to monetise or quantify. Therefore, exact quantification of the benefits and costs in this report was not considered necessary, beneficial or practicable in relation to all potential costs and benefits. Rather, this report identifies where there may be additional costs or cost savings.

7.3. Choice of evaluation method / approach

The evaluation method should be appropriate to the scale and significance of the proposal, and to the type of information and issue. Although the scale and the significance of the proposal has been identified as medium-high, as noted above, it is difficult to quantify many of the costs and benefits. To the extent that applies, an appropriate and fulsome evaluation can be undertaken on a qualitative basis.

The following sections start with the identification the high-level resource management issue and then moves into an assessment of the appropriateness of objectives and an evaluation of options for achieving the objectives. A two-tiered approach has been undertaken because PPC26 proposes to amend objectives and policies in Chapter 14A of the City Plan (which sets out the policy framework for the residential zone more generally) and also in the sections that relate to the individual zones Chapter 14B Suburban Residential Zone, Chapter 14D City Living Zone and Chapter 17 Commercial Zone. Appendix 13 contains a diagram that illustrates this approach.

Section 14 then presents a detailed evaluation of the proposed provisions for the preferred approach.

8. Resource Management Issues

The City Plan includes Issue 2A.2.5 Population Growth. This issue sets out Tauranga's sustained high population growth over the last few decades and notes that it is forecasted to continue. It also notes the changes in demographics to an increase in smaller households and an aging population. It further recognises the constraints of greenfield land in terms of providing for population growth and being efficiently serviced with infrastructure. Housing affordability is also recognised.

This issue is still considered relevant; however, some minor amendments are proposed to acknowledge the need to balance intensification with differing household needs and mitigate the effects of increased urban density on existing residential areas and amenity.

In addition, Section 2A.3 of the City Plan sets out the targets for housing development capacity within Tauranga City for the period 2018-2048 in accordance with NPS-UDC (now NPS-UD). Currently only 15% of new dwellings are through intensification, whereas the target is 25%. The current City Plan rule framework is considered to be overly restrictive in regard to intensification and unable to respond to the demands of a growing and changing population. Reducing existing constraints to residential intensification within the City Plan policy framework is a key objective of PPC26 and enable an enhanced housing supply and improving housing choice to respond to the demands of increased population, changing demographics and an aging population.

Along with the positive benefits of increased residential capacity in the right locations noted above, intensification can also have a range of adverse effects if not designed well to respond to its surrounding context. These include effects on existing residential amenity values. Intensification can result in larger and higher buildings next to well-established low-density environments and can result in a range of effects, including shading, dominance, reduced privacy and outlook, less green space and landscaping, and increased noise. People may also perceive new building forms or types as affecting the character of an area.

This means that planning for increased residential density requires careful consideration of acceptable levels of effects, and the need for avoidance or mitigation of these effects. Generally, well developed provisions that provide sufficient guidance to developments on good design outcomes can effectively manage potential adverse amenity effects.

9. Appropriateness of high-level objectives

9.1. Under section 32(1)(a) the appropriateness of the objectives must be assessed.

Objective or group of objectives:

The following existing targets as currently identified in the issues section of the City Plan:

2A.3 Targets for housing development capacity – Tauranga City

Provide housing development capacity within Tauranga City for the period 2018-2048 as set out in Table 2A.1: Development Capacity for Housing Required in Tauranga City.

The following amended objectives:

4B.1.3 Objective – Parking

Vehicle and bicycle parking is provided that meets the demand of activities either on-site or in the vicinity to ensure that the safe, sustainable and efficient functioning of the adjoining transport network is maintained and that parking areas provide appropriate stormwater disposal.

14A.1.1 Objective – Urban Form and Sustainable Management of the Residential Land Resource

Residential greenfield, infill development and intensification provide for an integrated, liveable and sustainable community, incorporating high quality urban design outcomes, is compatible with the landscape character and planned residential amenity, contributes to well-functioning urban environments and provides a variety of forms of low density, medium density and high density residential development that:

- a) Occurs in an orderly, efficient and integrated manner;*
- b) Minimises any adverse environmental effects of development on water and soil quality, land stability, amenity, landscape character and the transport network.*

14A.1.2 Objective – Residential Diversity and Densities

A range of dwelling types and densities are provided to meet varied residential needs in a way that is compatible with the planned residential character, amenity and environmental characteristics.

14B.1.3 Objective - Density of Development in the Suburban Residential Zone and Large Lot Residential Zone – seeks to provide for a range of dwelling types and densities to reflect the diverse needs of the community that is compatible with the planned built form and residential amenity for the Suburban Residential Zone.

- a) Low density development provides for a range of residential activities in the Large Lot Residential Zone with private on-site open space and open space between sites; and*
- b) A range of housing types and densities are provided for in the Suburban Residential Zone to reflect the diverse needs of the community that provides high quality on-site amenity and is compatible with the planned built form and residential amenity for the zone.*

14D.1.3 Objective: Density of Development in the City Living Zone –

Land within the zone is efficiently used to provide higher density residential development with some specific mixed use activity, that increases housing capacity and choice and pedestrian and cycle access to centres and public transport.

Category	Criteria	Comment
Relevance.	Directed to addressing a resource management issue.	Proposed amendments to Objective 14A.1.1 and 14A.1.2 are considered to achieve existing issue 2A.2.5 Population Growth. The issue identifies Tauranga's high population growth as a key matter to be addressed. The two objectives link to the issue through identifying the role that greenfield, infill and intensification has in addressing this matter. It also recognises the importance of providing a variety of different housing types and densities.
Relevance.	Focused on achieving the purpose of the Act (Part 2).	<p>The proposed objectives achieve the purpose of the RMA as they promote the sustainable management of natural and physical resources by enabling development of a variety of residential living opportunities, efficient use of land and facilitating the co-ordinated delivery of integrated, liveable and sustainable communities. They also assist in reducing car-based travel demand and promoting more active travel modes and potential to reduce emissions.</p> <p>The objectives will also ensure the efficient use and development of natural and physical resources (s7(b)) through providing for residential growth in both existing and greenfield areas of the city.</p> <p>The objectives also seek to incorporate high quality urban design outcomes and maintain and enhance amenity which will contribute towards achieving s7(c).</p>
Relevance.	Assists TCC in carrying out its statutory functions (s31).	<p>The proposed objectives strike an appropriate balance to achieve the integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district and providing sufficient development capacity in respect of housing land to meet the expected demands of the district.</p> <p>The proposed objectives achieve the purpose of the LGA as they promote the social, economic, environmental, and cultural well-being of communities in the present and for the future.</p>
Relevance.	Within scope of higher-level documents.	<p>The objectives will contribute towards giving effect to NPS-UD. See Appendix 2a for an assessment of how PPC26 gives effect to the NPS-UD.</p> <p>The objectives will contribute towards giving effect to the RPS. See Appendix 2c for an assessment of how PPC26 gives effect to the RPS.</p>
Feasibility.	Acceptable level of uncertainty and risk.	<p>The objectives present an acceptable level of uncertainty and risk. Learnings have been taken from other high growth Councils who have faced similar issues²⁴. Also, financial and architectural feasibility modelling (attached as Appendix 6) and a development capacity assessment (attached as Appendix 5) has assisted with determining the approach.</p> <p>Community feedback through a range of processes including FDS, TUS, and UFTI has supported greater density and breath of housing typology being provided for in the City Plan.</p>
Feasibility.	Realistically able to be achieved within council's powers, skills and resources.	The objectives are realistically able to be achieved within Council's powers, skills and resources. PPC26 will provide a framework for these objectives to be achieved and it is up to developers, landowners and housing providers as to whether they take up these opportunities. Financial feasibility

²⁴ Enabling Growth – Urban Zones Research: Key Observations, Findings and Recommendations, Beca Limited, 2018.

Category	Criteria	Comment
		testing has indicated that, due to a number of factors many of which are outside of the Council's control, uptake will be slow but will increase over time.
Acceptability.	Consistent with identified iwi/Maori and community outcomes.	Engagement with Tangata Whenua has taken place since early 2019. Issues raised have been mostly outside of the scope of the plan change. However, there have been some comments/ questions around viewshafts and the Tauranga Moana Principles. See Appendix 3 for an assessment of the plan change against Iwi management plans and Appendix 10b for a report on the latest round of engagement with Tangata Whenua.
Acceptability.	Will not result in unjustifiably high costs on the community or parts of the community.	<p>The purpose of PPC26 is to reduce the cost, risk and uncertainty in delivering different housing typologies across the city to meet the community's changing needs.</p> <p>It is anticipated that PPC26 will provide greater opportunity for the Community's housing needs to be met. It may also have positive impacts in terms of efficient use of land and infrastructure.</p>

9.2. Evaluation of options to achieve the high-level objectives

The following section analyses four options to deliver on the Objectives in 14A. It should be noted that the above objectives are existing plan objectives and the intent of these remain relevant but require minor amendments to give effect to NPS-UD requirements and update wording to refer to 'planned built form' as oppose to maintaining existing amenity.

9.3. Description options

Four options were considered for achieving Objective 14A.1.1 Urban Form and Sustainable Management of the Residential Land Resource and Objective 14A.1.2 Residential Diversity and Densities. Option 1 retains status quo, whereas Options 2, 3 and 4 investigate opportunities for intensification in different locations within the city. These options considered were also tested as part of the development capacity assessment contained in Appendix 5.

Additional policies are proposed as part of Options 2, 3 and 4 to support Objective 14A.1.1 Urban Form and Sustainable Management of the Residential Land Resource to specify a course of action to achieve high quality urban design outcomes. The policies link to the outcomes identified in the ROF and encourage development that achieves high quality on-site amenity and buildings that relate well to their immediate and wider surroundings.

It is noted that the greenfield component of future residential developments has not been considered in these options, as Tauriko West, Te Tumu and future growth areas are subject to separate planning projects which are currently underway. Therefore, only the options that relate to growing 'up' in existing residential areas is considered below.

The options considered are:

9.3.1. Option 1 - Status quo

This option is to retain the framework currently within the City Plan.

- (a) In the Suburban Residential Zone this framework provides for one independent dwelling unit on a minimum 325m² site, and a secondary independent dwelling unit on a minimum 500m² site as a permitted activity;
- (b) Terrace or townhouse style development in the Suburban Residential Zone is a discretionary activity;
- (c) In terms of the Te Papa peninsula, the majority of this area is currently within the Suburban Residential Zone, parts of the northern end of the peninsula are within the City Living Zone or the City Centre Zone. There are also pockets of Commercial Zone, particularly along the Cameron Road corridor and at Fraser Cove. These zones all provide opportunity for residential development;
- (d) The City Living Zone provides for higher density housing through the 'comprehensively designed development' activity, which is a restricted discretionary activity. The minimum site area required for each independent dwelling unit is 200m², however for sites over 1,050m² no density limit applies. A single independent dwelling unit on a site has discretionary activity status;
- (e) In the Commercial Zone (which is also located throughout the City) and City Centre Zone, residential activities are a permitted activity. Within the Commercial Zone a maximum density of 1 independent dwelling unit per 50m² gross site area applies. There is no density requirement in the City Centre Zone.

9.3.2. Option 2 - Te Papa Peninsula, Suburban Residential Zone and Commercial Zone

This option proposes amendments to the Suburban Residential Zone, City Living Zone and to introduce a new Te Papa Housing Overlay to enable greater housing development capacity. This option would provide additional housing choice across most of the residential zones. Amendments are proposed to the Commercial Zone to enable the assessment of on-site amenity and urban design outcomes. This option would entail the following:

- (a) In the Suburban Residential Zone, 1 independent dwelling unit per 325m² will continue to have a permitted activity status;
- (b) Two new activities are also proposed. Firstly, “duplex dwellings” which will replace secondary independent dwellings and be a permitted activity on a minimum site of 400m². Secondly, multi-unit development on a site will be provided for through the comprehensively designed development activity, this will be a restricted discretionary activity with no specified density limits and non-notification;
- (c) In the Te Papa peninsula, there is to be a particular focus on intensification given its location and characteristics. This has been subject to an extensive and detailed design and engagement process through the Te Papa Spatial Plan workstream. To implement the land use component of the Te Papa Spatial Plan it is proposed that a new Te Papa Housing Overlay is introduced and amendments made to the City Living Zone provisions to enable greater intensification of the Te Papa Peninsula and to give effect to the NPS-UD. It should be noted that the Te Papa Housing Overlay and the amended City Living Zone are proposed to be aligned through policy direction and provisions to achieve the same built form outcome. Appendix 8 provides further explanation on this approach and the planning mechanisms that were considered to enable intensification in Te Papa. Analysis and discussion of the location and extent of the Te Papa Housing Overlay is contained in Appendix 7;
- (d) Amendments are also proposed to the Commercial Zone. Residential activities are proposed to be amended to a restricted discretionary activity, this will enable on-site amenity and urban design outcomes to be taken into consideration;
- (e) It is proposed to introduce minimum on-site bicycle parking to support a well-functioning multimodal transport system.

9.3.3. Option 3 - Suburban Residential Zone and Commercial Zone

This option proposes amendments to the Suburban Residential Zone to enable greater housing development capacity. Amendments are proposed to the Commercial Zone to enable the assessment of on-site amenity and urban design outcomes. This option would entail the following:

- (a) In the Suburban Residential Zone, 1 independent dwelling unit per site will continue to have a permitted activity status;
- (b) Two new activities are also proposed. Firstly, “duplex dwellings” which will replace secondary independent dwellings and be a permitted activity on a minimum site of 400m². Secondly, multi-unit development on a site will be provided for through the ‘comprehensively designed development’ activity, this will be a restricted discretionary activity with no specified density limits and non-notification;
- (c) Amendments are also proposed to the Commercial Zone. Residential activities are proposed to be amended to a restricted discretionary activity, this will enable on-site amenity and urban design outcomes to be taken into consideration;

- (d) It is proposed to introduce minimum on-site bicycle parking to support a well-functioning multimodal transport system;
- (e) It is noted that no additional height is provided in this option.

9.3.4. Option 4 - Te Papa and Commercial Zone

This option proposes amendments to the City Living Zone and to introduce a new Te Papa Housing Overlay to enable greater housing development capacity. This option would concentrate additional housing choice within the Te Papa peninsula. Amendments are proposed to the Commercial Zone to enable the assessment of on-site amenity and urban design outcomes. This option would entail the following:

- (a) In the Te Papa peninsula, there is to be a particular focus on intensification given its location and characteristics. This has been subject to an extensive and detailed design and engagement process through the Te Papa Spatial Plan workstream. To implement the land use component of the spatial plan it is proposed that a new Te Papa Housing Overlay is introduced and amendments made to the City Living Zone to enable greater intensification of the Te Papa Peninsula and to give effect to the NPS-UD. It should be noted that the Te Papa Housing Overlay and the amended City Living Zone provisions are proposed to be aligned through policy direction and provisions to achieve the same built form outcome. Appendix 8 provides further explanation on this approach and the planning mechanisms that were considered to enable intensification in Te Papa. Analysis and discussion of the location and extent of the Te Papa Housing Overlay is contained in Appendix 7;
- (b) Amendments are also proposed to the Commercial Zone. Residential activities are proposed to be amended to a restricted discretionary activity, with no specified density limits and non-notification. This will enable on-site amenity and urban design outcomes to be taken into consideration;
- (c) It is proposed to introduce minimum on-site bicycle parking to support a well-functioning multimodal transport system.
- (d) It is noted that no changes are proposed to the wider Suburban Residential Zone.

9.4. Analysis of options

9.4.1. Evaluating Effectiveness

Effectiveness generally means consideration of the extent to which an intended outcome will be achieved by an option.

In this case, the relevant outcomes against which effectiveness of an option should be assessed are:

- Achieving compact urban form objectives and policies for greenfield and urban intensification;
- Achieving natural hazard risk management objectives including:
 - Risk reduction in the High-Risk Area to medium levels (and lower if reasonably practicable);
 - Achieving a low risk on development sites after completion of the development.

An option should be evaluated as reasonably effective and not fatally flawed before its efficiency is considered.

9.4.2. Evaluating Efficiency

The most efficient option will be the one that can achieve the outcome at least overall or net cost, taking into account all costs and benefits arising from the intervention.

This is confirmed and emphasised by the Environment Court in *Royal Forest & Bird Protection Society Inc v Whakatāne District Council* [2017] NZEnvC 051 (*Royal Forest & Bird*)²⁵.

The obligation under section 32(b)(ii) is to give effect to the objective in the least restrictive manner possible or at the least cost possible.

Hence the efficiency of the options can be evaluated and compared by assessing the following:

- Costs and benefits of establishing the provisions;
- Costs and benefits of compliance with the provisions.

9.4.3. Assessment of Options

Options are evaluated below against criteria for effectiveness and efficiency.

Colour coding of the table cells provide an overall qualitative rating of the extent to which an option will meet the criteria:

- Green – High;
- Orange – Moderate;
- Red – Low.

The text within each cell explains the reasoning for the overall qualitative rating.

A low (red) rating on effectiveness is generally viewed as an indication of ineffectiveness and a “fatal flaw”.

²⁵ “(59) In considering what rule may be the most appropriate in the context of the evaluation and section 32 of the Act, we consider that notwithstanding the amendments that have been made to that section in the meantime, the presumptively correct approach remains as expressed in *Wakatipu Environmental Society Inc v Queenstown Lakes District Council*: that where the purpose of the Act and the objectives of the plan can be met by a less restrictive regime then that regime should be adopted. Such an approach reflects the requirement in section 30(1)(b)(ii) to examine the efficiency of the provision by identifying, assessing and, if practicable, quantifying all of the benefits and costs anticipated from its implementation. It also promotes the purpose of the Act by enabling people to provide for their well-being while addressing the effects of their activities.”

9.4.4. Analysis of options

The following table provides an analysis of the four options described above.

	Option 1 – Status quo	Option 2 – Te Papa Peninsula, Suburban Residential Zone and Commercial Zone	Option 3 – Suburban Residential Zone and Commercial Zone	Option 4 - Te Papa and Commercial Zone
Costs				
Environmental	To accommodate projected growth, and in the absence of providing for increased intensification opportunities, there will continue to be pressure on expanding the City to greenfield areas. This will in turn have implications on the natural environment, and a continued reliance on car-based travel and therefore higher emissions.	Enabling greater housing choice and densities will change the existing amenity and character of the Suburban Residential Zone in particular.	Enabling greater housing choice and densities will change the existing amenity and character of the Suburban Residential Zone.	Enabling greater housing choice and densities will change the existing amenity and character of parts of the Te Papa peninsula.
Economic	<p>The City has approximately 18 months left of land supply. This is likely to have implications in terms of housing affordability in a city which is already facing affordability issues.</p> <p>Housing affordability continues to be a challenge both in terms of home ownership and rents.²⁶ Home ownership rates are decreasing and the number of renter households experiencing stress is increasing.²⁷</p> <p>Development of more intensive housing would rely on a discretionary resource consent and its related resource consent and</p>	<p>Cost to Council of progressing the plan change.</p> <p>Development of residential activities in Commercial Zone would rely on the resource consent process and its related costs and uncertainties.</p>	<p>Cost to Council of progressing the plan change.</p> <p>Development of residential activities in the Commercial Zone would rely on the resource consent process and its related costs and uncertainties.</p> <p>This option does not give effect to the NPS-UD and therefore another plan change is required within 2 years.</p>	<p>Cost to Council of progressing the plan change.</p> <p>Development of residential activities in Commercial Zone would rely on the resource consent process and its related costs and uncertainties.</p>

²⁶ Page 8, Housing Demand and Need in Tauranga and Western Bay of Plenty, November 2017

²⁷ Page 16, TUS

	Option 1 – Status quo	Option 2 – Te Papa Peninsula, Suburban Residential Zone and Commercial Zone	Option 3 – Suburban Residential Zone and Commercial Zone	Option 4 - Te Papa and Commercial Zone
	application costs, risks and uncertainties.			
Social	<p>The City has approximately 18 months left of land supply. This is likely to have implications in terms of housing availability.</p> <p>This option fails to provide for increased housing capacity and choice and in turn address housing need and demand. In Tauranga City, couples without children are projected to increase by 11,800 or 70% and one-person occupied dwellings by 11,000 or 83% between 2017 and 2047. These changes signal a challenge to the historic typology of predominately three-bedroom homes on large sections. This option does not address an increasing need to provide smaller homes which can most efficiently be delivered on smaller sections or as multi-unit buildings.²⁸</p> <p>The current feasible capacity of this option is low and little redevelopment capacity can be added through single dwellings. Table 4-4 of the Development Capacity report in Appendix 5 sets out in detail the feasible capacity for this option.</p>	<p>Potential effects on adjoining properties and surrounding land uses as a result of intensification in existing low-density Suburban Residential Zone; being allowed.</p> <p>The change to provisions may reduce certainty for City Plan users in the short term.</p> <p>Additional overlay for Te Papa adds complexity to the City Plan.</p>	<p>Potential effects on adjoining properties and surrounding land uses as a result of intensification in existing low-density Suburban Residential Zone; being allowed.</p> <p>The change to provisions may reduce certainty for City Plan users in the short term.</p> <p>Fails to support public transport provision, investment in amenities and infrastructure and the vibrancy of the Te Papa peninsula including the Central City.</p> <p>Limits housing choice along the Te Papa peninsula even though it is recognised as a highly connected community with accessibility to open space, employment, public transport etc.</p>	<p>Potential effects on adjoining properties and surrounding land uses as a result of intensification in existing low-density Suburban Residential Zone along Te Papa peninsula; being allowed.</p> <p>The change to provisions may reduce certainty for Plan users in the short term.</p> <p>Additional overlay for Te Papa adds complexity to the Plan.</p> <p>Limited ability to enable housing choice across the city as it is limited to Te Papa peninsula so may not meet the needs of the wider community.</p>

²⁸ Page 21, Housing Demand and Need in Tauranga and Western Bay of Plenty, November 2017

	Option 1 – Status quo	Option 2 – Te Papa Peninsula, Suburban Residential Zone and Commercial Zone	Option 3 – Suburban Residential Zone and Commercial Zone	Option 4 - Te Papa and Commercial Zone
	Does not achieve on-site amenity or high quality urban design outcomes in the Commercial Zone. Fails to support public transport provision, investment in amenities and infrastructure and the vibrancy of the Te Papa peninsula including the Central City.			
Cultural	There is no change to the cultural environment through this option. Existing rules will apply to culturally significant areas and viewshafts. Does not provide more alternative housing opportunities on Maori owned or Treaty settlement land within the Suburban Residential Zone or Te Papa peninsula.	Further intensification and development of land around sites of cultural significance.	Further intensification and development of land around sites of cultural significance. Does not enable more alternative housing opportunities on Maori owned or Treaty settlement land within the Te Papa Peninsula.	Further intensification and development of land around sites of cultural significance. Does not enable more alternative housing opportunities on Maori owned or settlement land within the Suburban Residential Zone.
Benefits				
Environmental	Amenity and character of existing residential areas will be retained. There is no change to the Natural Environment provisions proposed through this option. Existing rules will apply to Special Ecological Areas.	Intensification of existing urban areas promotes infrastructure efficiency and the use of alternative transport modes. Requiring bicycle parking supports the reduction of car-based travel, promoting more active travel modes and potential to reduce emissions. Makes efficient use of residential land in and around centres and public transport. Requiring more intensive development to obtain resource consent with objectives that link to a design guide may lead to better environmental outcomes including protection of amenity, sustainability and efficiency,	Intensification of existing urban areas promotes infrastructure efficiency. Requiring bicycle parking supports the reduction of car-based travel, promoting more active travel modes and potential to reduce emissions. Requiring more intensive development to obtain resource consent with objectives that link to a design guide may lead to better environmental outcomes including protection of amenity. There is no change to the Natural Environment provisions proposed	Amenity and character of existing Suburban Residential Zone will be retained. Intensification of existing urban areas promotes infrastructure efficiency and the use of alternative transport modes Requiring bicycle parking supports the reduction of car-based travel, promoting more active travel modes and potential to reduce emissions. Makes efficient use of residential land in and around centres and public transport.

	Option 1 – Status quo	Option 2 – Te Papa Peninsula, Suburban Residential Zone and Commercial Zone	Option 3 – Suburban Residential Zone and Commercial Zone	Option 4 - Te Papa and Commercial Zone
		<p>with regard to water efficiency, incorporating sustainable water solutions, renewable energy and building orientation.</p> <p>There is no change to the Natural Environment provisions proposed through this option. Existing rules will apply to Special Ecological Areas.</p>	<p>through this option. Existing rules will apply to Special Ecological Areas.</p>	<p>Requiring more intensive development to obtain resource consent with objectives that link to a design guide may lead to better environmental outcomes including protection of amenity.</p> <p>There is no change to the Natural Environment provisions proposed through this option. Existing rules will apply to Special Ecological Areas.</p>
Economic	<p>No cost to Council of progressing a plan change through the statutory process.</p>	<p>This option provides a significant amount of (plan enabled) redevelopment capacity for attached dwellings and apartments, but only a small share of this can be feasibly developed in the short term based on current conditions. However, it is expected to increase overtime. The apartment and terrace housing typology as proposed in Te Papa delivers the greatest capacity with 20,940 additional units feasible under this option and additional 7,010 attached dwellings. In the short term more feasible capacity comes online and in the medium to long term a large number of plan enabled capacity will become feasible. Table 4-4 of the Development Capacity report in Appendix 5 sets out in detail the feasible capacity for this option.</p> <p>Economic growth and employment opportunities would arise from construction activity.</p> <p>The shops and businesses in the CBD and commercial zones in the Te Papa peninsula may benefit from having</p>	<p>This option provides a significant amount of (plan enabled) redevelopment capacity for attached dwellings and town housing/terraced housing, but only a small share of this can be feasibly developed in the short term based on current conditions. However, it is expected to increase overtime. The terrace housing typology delivers the greatest capacity with 20,940 additional units feasible under this option and additional 7,130 attached dwellings. Table 4-4 of the Development Capacity report in Appendix 5 sets out in detail the feasible capacity for this option.</p> <p>Economic growth and employment opportunities would arise from construction activity.</p>	<p>This option provides a moderate amount of (plan enabled) redevelopment capacity for attached dwellings and apartments, but only a small share of this can be feasibly developed in the short term based on current conditions. However, it is expected to increase overtime. The apartment and terrace housing typology within Te Papa provides a capacity of 7,410 additional units feasible under this option and additional 5,040 attached dwellings. Table 4-4 of the Development Capacity report in Appendix 5 sets out in detail the feasible capacity for this option.</p> <p>Economic growth and employment opportunities would arise from construction activity.</p> <p>The shops and businesses in the CBD and Commercial Zone in the Te Papa Peninsula may benefit from having more people living in close proximity and using their services.</p>

	Option 1 – Status quo	Option 2 – Te Papa Peninsula, Suburban Residential Zone and Commercial Zone	Option 3 – Suburban Residential Zone and Commercial Zone	Option 4 - Te Papa and Commercial Zone
		more people living in close proximity and using their services.		
Social	Existing rules are retained and community expectations are maintained.	<p>Will address on-site amenity issues in the Commercial Zone and provide quality living environments for future residents.</p> <p>Will support public transport provision, investment in amenities and infrastructure and the vibrancy of the Te Papa peninsula including the Central City.</p> <p>Provides housing choice to meet community needs across the city through duplex dwellings and CDD.</p>	<p>Will address on-site amenity issues in the Commercial Zone and provide quality living environments for future residents.</p> <p>Provides greater housing choice across the city to meet the changing needs of the community.</p>	<p>Will address on-site amenity issues in the Commercial Zone and provide quality living environments for future residents.</p> <p>Provides walkable catchments for housing from high amenity areas with close proximity to shops, public transport, open space and education.</p>
Cultural	There is no change to the cultural environment through this option. Existing rules will apply to culturally significant areas and viewshafts.	<p>There is no change to the cultural environment through this option. Existing rules will apply to culturally significant areas and viewshafts.</p> <p>Enables more intensive housing opportunities on Maori owned or Treaty settlement land within the Suburban Residential Zone and the Te Papa peninsula.</p>	<p>There is no change to the cultural environment through this option. Existing rules will apply to culturally significant areas and viewshafts.</p> <p>Enables more intensive housing opportunities on Maori owned or Treaty settlement land within the Suburban Residential Zone.</p>	<p>There is no change to the cultural environment through this option. Existing rules will apply to culturally significant areas and viewshafts.</p> <p>Enables more intensive housing opportunities on Maori owned or Treaty settlement land within the Te Papa peninsula.</p>
Efficiency				
	The existing approach contained in the City Plan will not achieve the existing and proposed objectives in 14A. The report <i>Tauranga City Plan – Section 35 reporting/gap analysis</i> undertaken by Beca Limited in August 2019 (Appendix 4) provides a detailed assessment of the efficiency and effectiveness	This option provides the greatest opportunity in terms of residential development capacity, making it more likely that residential intensification will make a significant contribution towards achieving the target as set out in Section 2A.3 of the City Plan for housing development capacity medium to long term.	This option will likely achieve the objectives to a degree, although it will not achieve the highest benefit in terms of enabling housing development capacity or meeting the requirements of higher order documents. It will not provide for the greatest range of housing types in comparison to Option 2 and 4.	This option will likely achieve the objectives to a degree, although it will not achieve the highest benefit in terms of enabling housing development capacity. It will provide a range of housing types but only in the Te Papa peninsula and therefore the inefficiencies identified in the

	Option 1 – Status quo	Option 2 – Te Papa Peninsula, Suburban Residential Zone and Commercial Zone	Option 3 – Suburban Residential Zone and Commercial Zone	Option 4 - Te Papa and Commercial Zone
	<p>of the Operative City Plan provisions.</p> <p>Retaining the status quo will continue to provide a complex consenting approach for duplex dwellings and multi-unit development in Suburban Residential Zone.</p>	<p>Providing for a range of opportunities across various zones and areas of the City will also provide for a range of housing densities and diversity.</p>		<p>Suburban Residential Zone will remain.</p>
Effectiveness				
	<p>Does not implement the TUS or FDS.</p> <p>Does not give effect to NPS-UD.</p> <p>Does not give effect to the urban growth provisions in the RPS.</p> <p>Will not deliver on the targets for housing development capacity as set out in Section 2A.3 of the City Plan and RPS.</p> <p>The operative City Plan provisions will make a minimal contribution towards achieving the objectives in 14A.</p>	<p>Aligns with the direction in the TUS and FDS.</p> <p>Gives effect to NPS-UD and the urban growth provisions in the RPS.</p> <p>The approach will provide the most opportunity for success in terms of achieving greater housing capacity. This is because the approach enables a range of housing types across the City. However, it should be noted that while the plan can enable development capacity, there are many factors, including the market, construction costs, land values that will impact the rate of uptake.</p>	<p>Does not align with the direction in the TUS and FDS. As Te Papa is a key aspect of implementing these documents.</p> <p>Does not give effect to NPS-UD. In terms of Policy 3.</p> <p>Gives effect to the urban growth provisions in the RPS.</p> <p>Will contribute towards achieving the targets for housing development capacity as set out in Section 2A.3 of the City Plan.</p> <p>Although the new provisions will contribute towards achieving the objectives, this option does not provide the most opportunity for intensification and therefore is not the most effective.</p>	<p>Aligns with the direction in the TUS and FDS, in terms of progressing Te Papa as an area for intensification.</p> <p>Gives effect to NPS-UD and the urban growth provisions in the RPS.</p> <p>Will contribute towards achieving the targets for housing development capacity as set out in 2A.3 of the City Plan.</p> <p>Although the new provisions will contribute towards achieving the objectives, this option does not provide the most opportunity for intensification and therefore is not the most effective.</p>

	Option 1 – Status quo	Option 2 – Te Papa Peninsula, Suburban Residential Zone and Commercial Zone	Option 3 – Suburban Residential Zone and Commercial Zone	Option 4 - Te Papa and Commercial Zone
Risk of acting or not acting				
<p>The risk of not acting is high. A review of the residential provisions of this nature has not been undertaken since the last City Plan review that commenced in 2008. There is sufficient information to indicate that housing capacity and affordability continues to be a significant issue in Tauranga City²⁹ and the current approach does not address Issue 2A.2.5 Population Growth or objectives 14A.1.1 Urban Form and Sustainable Management of the Residential Land Resource and 14A.1.2 Residential Diversity and Densities as set out in the City Plan.</p>				

²⁹ Western Bay Sub-Region Residential Development Capacity Review, Veros, May 2019

9.4.5. Preferred option

Option 2 is the preferred option as it provides the greatest opportunity in terms of residential development capacity, making it more likely that residential intensification will make a significant contribution towards achieving the target as set out in Section 2A.3 of the City Plan for housing development capacity medium to long term. This is because the approach enables a range of housing types across the City. This option also aligns with higher order documents, particularly the direction in the TUS and FDS and gives effect to the NPS-UD.

This approach has strong public support. The online survey responses for PPC26 indicate general support for the direction and rule framework for each of the proposed housing types/criteria in the Suburban Residential Zones, Te Papa Peninsula, residential activities in the Commercial Zone, and the focus on achieving quality design outcomes.

The implementation of the approach outlined in Option 2 requires the following changes to the City Plan:

- (a) Introduce a new overlay within the targeted areas in the Te Papa peninsula with new provisions to align with City living Zone;
- (b) Provide for comprehensively designed development in the Suburban Residential Zone, City Living Zone and Te Papa Housing Overlay as Restricted Discretionary Activity with new provisions;
- (c) Amend existing provisions in the City Living Zone to be more enabling;
- (d) Make amendments to the Definitions and the Subdivision residential provisions; and
- (e) Make consequential amendments to other sections of the Plan. The consequential amendments are not substantive or policy amendments that would require comprehensive review or options analysis.

The specific City Plan objectives, proposed to achieve the Option 2 are evaluated below, firstly for Suburban Residential Zone, secondly for Commercial Zone, and thirdly for City Living Zone/Te Papa Housing Overlay.

Section 14 of the report outlines the relevant policies, rules and matters of discretion that give effect to these objectives.

10. Suburban Residential Zone Evaluation

10.1. Appropriateness of objectives

Objective or group of objectives:

The following amended objectives:

14B.1.1 Objective - Bulk and Scale of Buildings in the Suburban Residential Zone and Large Lot Residential Zone – seeks that new buildings are of a bulk and scale consistent with the character and amenity planned for the Suburban Residential Zone.

Buildings that are of a bulk and scale consistent with the residential character and amenity planned for the zone

14B.1.2 Objective - Site Layout and Building Design - Suburban Residential Zone and Large Lot Residential Zone – seeks that the location, scale and design of new buildings are consistent with a suburban residential character.

Development provides a suburban residential character that is characterised by space around buildings, location of private on-site open space, solar access to indoor and outdoor living areas, privacy and scale of buildings.

14B.1.3 Objective - Density of Development in the Suburban Residential Zone and Large Lot Residential Zone – seeks to provide for a range of dwelling types and densities to reflect the diverse needs of the community that is compatible with the planned built form and residential amenity for the Suburban Residential Zone.

- c) Low density development provides for a range of residential activities in the Large Lot Residential Zone with private on-site open space and open space between sites; and*
- d) A range of housing types and densities are provided for in the Suburban Residential Zone to reflect the diverse needs of the community that provides high quality on-site amenity and is compatible with the planned built form and residential amenity for the zone.*

Category	Criteria	Comment
Relevance.	Directed to addressing a resource management issue.	The proposed objectives address resource management issue 2A.2.5 <i>Population Growth</i> in the City Plan as they provide opportunities for housing choice and a range of types of residential development. The objectives also recognise that a certain level of amenity needs to be achieved in the Suburban Residential Zone through urban design outcomes, bulk and location of buildings, site layout and building design and the density of development.
Relevance.	Focused on achieving the purpose of the Act (Part 2).	<p>The proposed objectives achieve the purpose of the RMA as they promote the sustainable management of natural and physical resources by enabling development of a variety of residential living opportunities and efficient use of land and facilitating the co-ordinated delivery of integrated, liveable and sustainable communities.</p> <p>The proposed objectives will also ensure the efficient use and development of natural and physical resources (s7(b)) through providing for residential growth in existing areas of the city.</p> <p>The objectives also seek to incorporate high quality urban design outcomes and maintain and enhance amenity which will contribute towards achieving s7(c).</p>
Relevance.	Assists TCC in carrying out its statutory functions (s31).	The proposed objectives strike an appropriate balance to achieve the integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district and providing sufficient development capacity in respect of housing land to meet the expected demands of the district.

Category	Criteria	Comment
Relevance.	Within scope of higher-level documents.	<p>The proposed objectives will contribute towards giving effect to NPS-UD. See Appendix 2a for an assessment of how PPC26 gives effect to the NPS-UD.</p> <p>The proposed objectives will contribute towards giving effect to the RPS. See Appendix 2c for an assessment of how PPC26 gives effect to the RPS.</p>
Feasibility.	Acceptable level of uncertainty and risk.	The objectives present an acceptable level of uncertainty and risk. Learnings have been taken from other high growth Councils who have faced similar issues ³⁰ . Also, financial and feasibility modelling ³¹ and a development capacity assessment ³² has assisted with determining the approach.
Feasibility.	Realistically able to be achieved within council's powers, skills and resources.	The proposed objectives are realistically able to be achieved within Council's powers, skills and resources. PPC26 will provide a framework for these objectives to be achieved and it is up to developers, landowners and housing providers as to whether they take up these opportunities. Financial and architectural feasibility testing has indicated that, due to a number of factors many of which are outside of the Council's control, uptake will be slow and over a long period of time.
Acceptability.	Consistent with identified iwi/Maori and community outcomes.	<p>Engagement with Tangata Whenua has taken place since early 2019. Issues raised have been mostly outside of the scope of the plan change. However, there have been some comments/ questions around viewshafts and the Tauranga Moana Principles. See Appendix 3 for an assessment of the plan change against Iwi management plans and Appendix 10b for a report on the latest round of engagement with Tangata Whenua.</p> <p>Community engagement has been generally supportive for intensification in existing urban areas and increase the housing capacity and choice in existing urban areas. See Appendix 10c for a report on community and stakeholder engagement.</p>
Acceptability.	Will not result in unjustifiably high costs on the community or parts of the community.	The proposed objectives will reduce costs for applicants as the consenting process for duplex dwellings and comprehensively designed development in the Suburban Residential Zone will be more permissive, providing greater certainty and potential reduced consenting costs and risk.

30 Beca: Enabling Growth – Urban Zones Research: Key Observations, Findings and Recommendations, 10 August 2018

31 Residential Intensification Concept Designs and proposed Plan Change Testing (Veros and designgroup stapleton elliot 2020)

32 Development Capacity Report, August 2020, Market Economics

10.2. Evaluation of options to achieve the objectives

The following section analyses three options to deliver on the Objectives identified above.

Three options for achieving the objectives have been identified. These are:

10.2.1. Option 1 – Status quo

This option is to retain the framework currently within the Operative City Plan. Which includes the following:

- (a) One independent dwelling unit per 325m² of nett site area, as a permitted activity;
- (b) Secondary independent dwelling unit on a minimum 500m² nett site area as a permitted activity;
- (c) Terrace or townhouse style development (comprehensively designed development) in parts of the Suburban Residential Zone (outside of urban growth areas) is a discretionary activity and subject to RMA notification tests under s.95.

10.2.2. Option 2 - Enabling approach with urban design consideration

This option will enable duplexes and comprehensively designed development throughout the Suburban Residential Zone outside of urban growth areas and identified high-risk natural hazard areas. The provisions that will apply include the following:

- (a) One independent dwelling unit per 325m² of nett site area, as a permitted activity;
- (b) Remove the provisions for secondary independent dwelling units;
- (c) Introduce a new permitted activity 'duplex dwelling' on a minimum 400m² site. Retain the existing building envelope requirements;
- (d) Introduce a new restricted discretionary activity CDD in the Suburban Residential Zone – outside of urban growth areas as a non-notified activity providing that all the permitted standards can be met;
- (e) Remove minimum site size or density requirements for CDD;
- (f) Where a CDD to comply with up to two permitted activity standards, the activity status will remain as restricted discretionary and more than two non-compliances will default to discretionary activity. RMA notification tests under s.95 will apply in these cases;
- (g) Retain the existing building envelope and site coverage requirements for duplex dwelling and CDD;
- (h) Allowing a reduction from 50m² to 30m² of outdoor living area but require this to be in the North, North East or North West aspect of the site;
- (i) Introduce new provisions to control size of independent dwelling units, visual outlook and admission of natural light, waste management areas, interface between public and private, and height of fences/walls in the streetscape setback;
- (j) Introduce a suite of new policies, rules and assessment criteria that have a focus on urban design outcomes. These are supported by a new non-statutory design guideline (ROF) to provide further guidance;
- (k) All applications for a CDD will be required to provide an engineering assessment of demand to ensure there is sufficient infrastructure capacity for water, wastewater and transport;
- (l) Subdivision to be in conjunction with, or following, land use/building consent.

10.2.3. Option 3 - Permissive approach

This option provides a very permissive approach with very little urban design considerations. The provisions that will apply include the following:

- (a) Introduce two new permitted activities CDD and 'duplex dwellings'. Retain the existing building envelope requirements. If the rules cannot be complied with then the full notification tests under section 95 of the RMA apply;
- (b) One independent dwelling unit per 325m² of nett site area, as a permitted activity;
- (c) Remove the provisions for secondary independent dwelling units;
- (d) Introduce a new permitted activity 'duplex dwellings' on a minimum 400m² site. Retain the existing building envelope and site coverage requirements for duplex dwelling and CDD;
- (e) Remove minimum site size or density requirements for a CDD;
- (f) Where a CDD fails to comply with up to two permitted activity standards, the activity status will default to a restricted discretionary Activity and more than two non-compliances will become discretionary activity;
- (g) Retain the existing building envelope requirements;
- (h) Allowing a reduction from 50m² to 30m² of outdoor living area but require this to be in the North, North East or North West aspect of the site;
- (i) Introduce new provisions to control size of independent dwelling units, visual outlook and admission of natural light, waste management areas, interface between public and private, and height of fences/walls in the streetscape setback;
- (j) Non-statutory urban design and on-site amenity guidelines (ROF) with no clear link to City Plan.
- (k) Subdivision to be in conjunction with, or following, land use/building consent.

10.2.4. Evaluation of options to achieve the objectives

	Option 1 – Status quo	Option 2 – Enabling approach with urban design consideration	Option 3 – Duplex Dwelling and CDD as permitted activity
Costs			
Environmental	<p>To accommodate projected growth, and in the absence of providing for increased intensification opportunities, there will continue to be pressure on expanding the City to greenfield areas. This will in turn have implications on the natural environment, and a continued reliance on car-based travel and therefore higher emissions.</p> <p>Limited in how high-quality urban design outcomes can be achieved as there is no urban design guide or policies/ assessment criteria that can ensure the consideration of urban design matters.</p>	<p>Enabling greater housing density and variety may change the existing amenity and character of the Residential Zones.</p>	<p>This option could lead to poor urban design outcomes, adverse effects on adjoining properties, the public realm and on-site amenity. These matters cannot be considered and assessed through a permitted activity status and would rely on a non-regulatory approach and the goodwill of applicants. This could lead to poor design outcomes and the existing character of the Suburban Residential Zone.</p> <p>Risk that developers will continue to develop detached dwellings, as a permitted activity and therefore forfeiting the opportunity for higher density development and will not promote housing choice through a range of housing types and densities.</p>
Economic	<p>The City has approximately 18 months left of land supply. Not enabling additional housing development capacity in the Suburban Residential Zone will continue to put pressure on land supply. This is likely to have implications in terms of housing affordability in a city which is already facing affordability issues.</p> <p>Housing affordability continues to be a challenge both in terms of home ownership and rents.³³ Home ownership rates are decreasing and the number of renter households experiencing stress is increasing.³⁴</p>	<p>Cost to Council of progressing the plan change.</p> <p>Cost of applying for a restricted discretionary resource consent for CDD and meeting urban design requirements.</p>	<p>Cost to Council of progressing the plan change.</p> <p>This option does not require each application to assess the proposed demand and infrastructure capacity and may result in unanticipated costs of upgrading infrastructure to accommodate growth within existing parts of the City.</p>

³³ Page 8, Housing Demand and Need in Tauranga and Western Bay of Plenty, November 2017

³⁴ Page 16, TUS

	Option 1 – Status quo	Option 2 – Enabling approach with urban design consideration	Option 3 – Duplex Dwelling and CDD as permitted activity
	<p>Over the short term (2022), the bulk of demand for dwellings is at mid-price points (\$400,000-\$700,000).</p> <p>The analysis suggests that there is little feasible capacity (redevelopment, apartments) between \$500,000 and \$599,000 under BAU and most of the feasible capacity starts around \$800,000, i.e. towards the upper end of the demand profile. Over the short term there is some demand for dwellings at these higher price points. Research indicates that over the medium term (to 2029), under BAU, there will be a mismatch between the type of dwellings that are feasible, and the dwellings demanded by households.³⁵</p> <p>Development of more intensive housing would rely on a discretionary resource consent and its related resource consent and application costs, risks and uncertainties. This may influence the cost of development and subsequently house prices.</p>		

³⁵ Development Capacity Report, August 2020, Market Economics

	Option 1 – Status quo	Option 2 – Enabling approach with urban design consideration	Option 3 – Duplex Dwelling and CDD as permitted activity
Social	<p>This option retains the low-density nature of the Suburban Residential Zone through primarily single detached dwellings. This will limit the range of housing types and price points available.</p> <p>In Tauranga City, couples without children are projected to increase by 11,800 or 70% and one-person occupied dwellings by 11,000 or 83% between 2017 and 2047. These changes signal a challenge to the historic typology of predominately three-bedroom homes on large sections. There is an increasing need to provide smaller homes which can most efficiently be delivered on smaller sections or as multi-unit buildings.³⁶</p>	<p>Potential effects on adjoining properties and surrounding land uses as a result of intensification in existing low-density Suburban Residential Zone; being allowed.</p>	<p>Potential effects on adjoining properties and surrounding land uses as a result of intensification in existing low-density Suburban Residential Zone being allowed.</p> <p>Potential risk that there will continue to be a mismatch between the type of dwellings that are feasible, and the dwellings demanded by households.</p> <p>This option may result in poor living conditions and associated social issues as a result of high-density residential developments that do not achieve quality urban design outcome.</p>
Cultural	<p>There is no change to the cultural environment through this option. Existing rules will apply to culturally significant areas.</p> <p>Does not provide alternative housing opportunities on Maori owned or Treaty settlement land within the Suburban Residential Zone.</p>	<p>Further intensification and development of land around sites of cultural significance.</p>	<p>Further intensification and development of land around sites of cultural significance.</p>
Benefits			
Environmental	<p>Amenity and character of existing residential areas will be retained.</p>	<p>By providing for intensification of existing residential areas supports sustainable management of physical resources and provides for good urban form through compatible land uses.</p> <p>Infrastructure modelling indicates that there is capacity in the existing trunk network to cater for infill uptake anticipated in the Suburban Residential Zone in the short to medium term. Where there may be capacity constraints in the local network this will be</p>	<p>By providing for intensification of existing residential areas supports sustainable management of physical resources and provides for good urban form through compatible land uses.</p>

³⁶ Page 21, Housing Demand and Need in Tauranga and Western Bay of Plenty, November 2017

	Option 1 – Status quo	Option 2 – Enabling approach with urban design consideration	Option 3 – Duplex Dwelling and CDD as permitted activity
		<p>assessed through the consent process for a CDD. See Appendix 9 for further details on this modelling.</p> <p>Requiring more intensive development to obtain resource consent with objectives that link to a design guide may lead to better environmental outcomes including protection of amenity, sustainability and efficiency, with regard to water efficiency, incorporating sustainable water solutions, renewable energy and building orientation.</p>	
Economic	No cost to Council of progressing a plan change through the statutory process.	<p>Providing a simpler compliance approach will reduce costs to those developing within the Suburban Residential Zone.</p> <p>This option provides a significant amount of (plan enabled) redevelopment capacity for attached dwellings and townhouses/terraced housing. The Development capacity assessment attached in Appendix 5 indicates that a large share of the future feasible capacity will become available over the medium term.</p> <p>The relative structure of the housing market is expected to remain relatively stable with standalone houses (detached dwellings) remaining the largest component, accounting for 82% of dwellings. But this share will slowly be eroded, due to increases in attached dwellings, dropping to 80%. This increase in share will be delivered because of an increase in attached developments.³⁷ This is also becoming apparent through recent resource consent application for attached dwellings, that align with the changes proposed through PPC26, and are using the more complex consenting pathway as a discretionary activity which suggest that there is a demand for these types of development and are feasible in the current market.</p>	<p>This option provides a significant amount of (plan enabled) redevelopment capacity for attached dwellings and townhouses/terraced housing.</p> <p>Increasing land supply for intensification will support employment opportunities. In addition, employment opportunities would arise from construction activity.</p> <p>Enabling duplex dwellings and CDD as permitted activity in the Suburban Residential Zone reduces costs and time associated with resource consents for developers.</p>

³⁷ Development Capacity Report, August 2020, Market Economics

	Option 1 – Status quo	Option 2 – Enabling approach with urban design consideration	Option 3 – Duplex Dwelling and CDD as permitted activity
		Increasing land supply for intensification will support employment opportunities. In addition, employment opportunities would arise from construction activity.	
Social	Existing rules are retained, and community expectations are maintained.	<p>This option supports and encourages greater housing choice across the Suburban Residential Zone as well as ensuring positive urban design outcomes and includes provisions to protect residential amenity.</p> <p>Will contribute towards achieving the targets for housing development capacity as set out in 2A.3 of the City Plan. It also allows people to choose to live in a range of housing types depending on their lifestyle.</p>	Will contribute towards achieving the targets for housing development capacity as set out in 2A.3 of the City Plan and provide for housing choice.
Cultural	There is no change to the cultural environment through this option. Existing rules will apply to culturally significant areas and viewshafts.	<p>There is no change to the cultural environment through this option. Existing rules will apply to culturally significant areas in the Suburban Residential Zone.</p> <p>Enables more intensive housing opportunities on Maori owned or Treaty settlement land within the Suburban Residential Zone.</p>	<p>There is no change to the cultural environment through this option. Existing rules will apply to culturally significant areas in the Suburban Residential Zone.</p> <p>Enables more intensive housing opportunities on Maori owned or Treaty settlement land within the Suburban Residential Zone.</p>
Efficiency			
	<p>Retaining the status quo will continue to provide a complex consenting approach for duplex dwellings and terraced housing in Suburban Residential Zone.</p> <p>It is an inefficient approach having impacts on the consenting process, certainty for developers seeking to provide urban growth as identified by the S.35.</p>	<p>Greater certainty provided through a simpler consenting regime for duplex dwelling and CDD, with a starting point of non-notification for CDD that can meet all the development standards.</p> <p>CDD also provides for flexibility for applicants to achieve the best outcome for the site without a large number of permitted activity standards.</p> <p>Proposed rules allow for flexibility to provide for a variety of housing typologies within the Suburban Residential Zone to meet objectives within the City Plan.</p> <p>This approach provides an efficient planning framework. Allowing for appropriate infill with the inclusion of objectives relating to design outcomes,</p>	<p>Greater certainty provided through the permitted activity status for duplex dwelling and CDD.</p> <p>This approach provides an efficient planning framework to achieve housing choice outcome but inefficient to achieve urban design outcomes and protect the residential amenity of existing urban areas.</p>

	Option 1 – Status quo	Option 2 – Enabling approach with urban design consideration	Option 3 – Duplex Dwelling and CDD as permitted activity
		<p>ensures the efficient use of land and compatible land uses. These objectives are supported by a non-statutory design guideline to improve efficiency within the consent process by clearly outlining Council's expectations for information to be submitted.</p> <p>It is considered that the proposed amendments outlined in Option 2 provide for an efficient regulatory framework to deliver intensification in the existing urban growth area.</p>	
Effectiveness			
	<p>Retaining status quo fails to effectively align the regulatory framework within the City Plan with the RPS and NPS-UD and demographic and household changes that have occurred over time within Tauranga City.</p> <p>Will not deliver on the targets for housing development capacity as set out in Section 2A.3 of the City Plan and RPS.</p> <p>Essentially, Option 1 is ineffective and unsatisfactory to meet the objectives of the plan change.</p>	<p>This option provides an appropriate balance between enabling appropriate development and ensuring good built form outcomes.</p> <p>The objectives, policies, rules and assessment criteria provide for multi-units on a site as a restricted discretionary activity to provide for greater choice in housing typology while also restricting discretion to provide for effective protection of residential amenity values and create good design outcomes.</p> <p>The infrastructure capacity information requirement and urban design assessment criteria provide Council with the ability to assess each application on its own merits as a restricted discretionary activity.</p> <p>Option 2 will effectively align the regulatory framework within the City Plan and give effect to the RPS and NPS-UD.</p> <p>This option would achieve the objectives set out in Section 11.1 of this report.</p> <p>It is considered that the proposed amendments to the City Plan provide an effective approach to delivering the objectives of PPC26.</p>	<p>This option will provide a permissive consenting framework for duplex dwellings and CDD in the Suburban Residential Zone. There are benefits in terms of enabling development through a permitted activity status, particularly around cost savings and certainty for applicants. However, this option would not enable the consideration of urban design outcomes and infrastructure capacity. This may result in a high cost to the community and Council and could lead to poor design outcomes and adverse effects on adjoining properties.</p> <p>This option aligns with the RPS and NPS-UD and demographic and household changes that have occurred over time within Tauranga City.</p> <p>This option does not achieve all of the objectives set out in Section 11.1 of this report, particularly in regard to achieving high quality urban design outcomes which has the potential to create negative impacts on the environmental conditions within the Suburban Residential Zone.</p> <p>Essentially, Option 3 is ineffective and unsatisfactory to meet the objectives of the plan change.</p>

	Option 1 – Status quo	Option 2 – Enabling approach with urban design consideration	Option 3 – Duplex Dwelling and CDD as permitted activity
Risk of acting or not acting			
<p>The risk of not acting is high. A review of the residential provisions of this nature has not been undertaken since the last City Plan review that commenced in 2008. There is sufficient information to indicate that housing capacity and affordability continues to be a significant issue in Tauranga City³⁸ and the current approach to the Suburban Residential Zone does not address Issue 2A.2.5, Objectives 14B.1.2 and 14B.1.3.</p> <p>The existing regulatory framework for duplex dwelling and CDD provides for a complex, time consuming and expensive consenting regime. There is a risk that if no action is taken then this regime will not allow the full potential for residential intensification in existing parts of the City to be realised and therefore the targets in Section 2A.3 of the City Plan will not be achieved.</p>			

³⁸ Tools for increasing social and affordable housing in the Western Bay of Plenty, Research for the Urban Form and Transport Initiative, March 2020; Corelogic, Ministry of Housing and Urban Development Capacity Dashboard; Western Bay Sub-Region Residential Development Capacity Review, Veros, May 2019; Development Capacity Report, August 2020, Market Economics

10.2.5. Preferred option

Option 2 is the preferred option. The proposed package of provisions provided through Option 2 is considered the most effective and efficient way to achieve Objectives 14B.1.1, 14B.1.2 and 14B.1.3. The benefits of Option 2 outweigh the costs and provide a balance between providing an enabling framework that includes permitted activity status for duplexes and a non-notified restricted discretionary status for CDD and allowing consideration of urban design outcomes and infrastructure capacity, which is particularly important where higher density forms of development are being introduced into existing neighbourhoods.

It is acknowledged that this involves a moderate policy change for the Suburban Residential Zone. Amendments to the existing objectives and policy wording is required to give effect to the NPS-UD but also provides for intensification in established residential areas that may not necessarily maintain the character of the area, but through the proposed provisions and matters of discretion will ensure that they are compatible with the established and planned character. The more enabling provisions would provide opportunities for more houses and variety of housing types.

The provisions respond to Council's obligation (Section 31(1)(aa)) for "the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district".

It is considered that Option 2 gives effect to the RPS, NPS-UD and is consistent with Part 2 of the RMA.

11. Commercial Zone Evaluation

11.1. Appropriateness of objectives

Objective or group of objectives:

The following existing objective that remain as currently in the City Plan:

17A.7.2 Objective – Site Layout and Building Design in the Commercial, Wairakei Town Centre Zone and Wairakei Neighbourhood Centre Zone

Buildings and structures within the zones provide for a safe, accessible and pleasant commercial environment that has regard to the interface with public spaces, the amenity of adjacent zones and the protection of the natural character of the City.

17A.7.3 Objective – Activities Within the Commercial, Wairakei Town Centre and Wairakei Neighbourhood Centre Zones

Development within the zones is characterised predominantly by business activities, integrated with mixed use, civic and community facilities.

The following new objectives

17A.7.4 Objective – Residential activities within the Commercial Zone

Enable an increase in the density, diversity and quality of housing in the Commercial Zone that provide a high amenity living environment on-site.

Category	Criteria	Comment
Relevance.	Directed to addressing a resource management issue.	The proposed objectives address resource management issue 2A.2.5 <i>Population Growth</i> as they introduce additional controls for on-site amenity and urban design to improve living standards in the Commercial Zone and ensure consistency and delivery of residential development across the City.
Relevance.	Focused on achieving the purpose of the Act (Part 2).	The proposed objectives achieve the purpose of the RMA as they promote the sustainable management of natural and physical resources by enabling people and communities to provide for their social well-being and health and safety through retaining existing development capacity while adding additional on-site amenity requirements. The objectives seek to incorporate high quality urban design outcomes and maintain and enhance amenity which will contribute towards achieving s7(c).
Relevance.	Assists TCC in carrying out its statutory functions (s31).	The proposed objectives strike an appropriate balance to achieve the integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district and providing sufficient development capacity in respect of housing and business land to meet the expected demands of the district.
Relevance.	Within scope of higher-level documents.	The proposed objectives will contribute towards giving effect to NPS-UD. See Appendix 2a for an assessment of how PPC26 gives effect to the NPS-UD. The proposed objectives will contribute towards giving effect to the RPS. See Appendix 2c for an assessment of how PPC26 gives effect to the RPS.

Category	Criteria	Comment
Feasibility.	Acceptable level of uncertainty and risk.	The issues identified and options taken forward are the most appropriate way to achieve the purpose of the RMA. If these changes were not made there is a risk that the City Plan would fall short of fulfilling its functions and could lead to poor amenity and urban design outcomes.
Feasibility.	Realistically able to be achieved within council's powers, skills and resources.	The proposed objectives are achievable through amendments proposed to the City Plan (objectives, policies, rules, and assessment criteria).
Acceptability.	Consistent with identified iwi/Maori and community outcomes.	Engagement with Tangata Whenua has taken place since early 2019. Issues raised have been mostly outside of the scope of the plan change. However, there have been some comments/ questions around viewshafts and the Tauranga Moana Principles. See Appendix 3 for an assessment of the plan change against Iwi management plans and Appendix 10b for a report on the latest round of engagement with Tangata Whenua. Community feedback has been general support for the proposed approach. Community engagement has been generally supportive to regulate development with poor design and amenity outcomes. See Appendix 10c for a report on community and stakeholder engagement.
Acceptability.	Will not result in unjustifiably high costs on the community or parts of the community.	The proposed objectives will incur some additional costs for applicants as residential activities will be subject to a resource consent process. However, these costs need to be weighed up against the benefit of provide for on-site amenity and high-quality urban design outcomes.

11.2. Description of options

Three options for achieving the objectives have been identified. These are:

11.2.1. Option 1 – Status quo

This option is to retain the framework currently within the Operative City Plan and includes the following:

- (a) Residential activities are a permitted activity in the Commercial Zone providing that they can meet all the permitted standards and must be above ground or separated from any street frontage by a minimum of 15 metres or 50% of the depth of the site, whichever is the lesser;
- (b) Maximum density of 1 dwelling per 50m²;
- (c) Maximum height limit of 12m throughout the city;
- (d) No urban design or on-site amenity controls included with the current approach.

11.2.2. Option 2 – Statutory on-site amenity controls and urban design assessment

This option will require residential activities to be subject to a restricted discretionary consent process, this will enable on-site amenity and urban design considerations to be taken into account. The provisions that will apply include the following:

- (a) Amend the activity status of residential activities from permitted to restricted discretionary;
- (b) Providing that all the standards can be met, these applications would be non-notified;
- (c) Residential activities will be required to be above ground floor only;
- (d) Where the activity fails to comply with up to two development standards, the activity status will remain as restricted discretionary and more than two non-compliances will default to a discretionary activity. RMA notification tests under s.95 will apply in these cases;
- (e) No maximum density provision for residential activities;
- (f) Introduce a suite of new policies, rules and assessment criteria that have a focus on urban design outcomes. These are supported by a new non-statutory design guideline (ROF) to provide further guidance;
- (g) Provide additional height up to six storeys in identified commercial zones in the Te Papa peninsula.

11.2.3. Option 3 - Non-statutory on-site amenity controls and urban design assessment

This option retains the existing approach in the Operative City Plan and introduces non-statutory guidance to address issues around on-site amenity and urban design. The approach includes the following:

- (a) Residential activities are a permitted activity in the Commercial Zone providing that they can meet all the permitted standards and must be above ground or separated from any street frontage by a minimum of 15 metres or 50% of the depth of the site, whichever is the lesser;
- (b) Minimum density of 1 dwelling per 50m²;
- (c) Maximum height limit of 12m throughout the city;
- (d) Non-statutory urban design and on-site amenity guidelines (ROF) with no clear link to City Plan.

11.2.4. Evaluation of options to achieve the objectives

	Option 1 – Status quo	Option 2 – Statutory on-site amenity controls and urban design assessment	Option 3 – Non-statutory on-site amenity controls and urban design assessment
Costs			
Environmental	Limited in how high-quality urban design outcomes can be achieved as there is no urban design guide or policies/ assessment criteria that can ensure the consideration of urban design matters.	No Environmental costs are identified with this option.	Voluntary on-site amenity requirements are likely to lead to poor living environments for occupants as there are no urban design policies, rules or assessment criteria that can ensure the consideration of urban design matters.
Economic	Retaining a maximum density requirement for residential activities leads to a lost opportunity in a zone where mixed use is generally accepted and can therefore accommodate a greater built form and intensity of activity.	Cost to Council of progressing the plan change. Cost of applying for a restricted discretionary resource consent for CDD and meeting urban design requirements.	Retaining a maximum density requirement for residential activities leads to a lost opportunity in a zone where mixed use is generally accepted and can therefore accommodate a greater built form and intensity of activity.
Social	Negative impact on community well-being. The City Plan currently has no standards for on-site amenity for residential activities in the Commercial Zone and as permitted activities, Council has no ability to influence or refuse consent for development that is poorly designed or does not achieve acceptable on-site amenity for future residents.	Potential reverse sensitivity effects of allowing greater residential densities in the Commercial Zone.	Negative impact on community well-being, as permitted activities, Council has no ability to influence, assess or refuse consent for development that is poorly designed or does not achieve acceptable on-site amenity for future residents.
Cultural	There is no change to the cultural environment through this option. Existing rules will apply to culturally significant areas in the Commercial Zone.	There is no change to the cultural environment through this option. Existing provisions will apply to culturally significant areas and viewshafts.	There is no change to the cultural environment through this option. Existing provisions will apply to culturally significant areas and viewshafts.
Benefits			
Environmental	No environmental benefits are recognised with retaining status quo.	This option proposes to introduce objectives, policies and assessment criteria to implement the objectives relating to urban design outcomes and on-site amenity. Providing for increased density within the Commercial Zone supports sustainable management of physical resources and efficient use of land through providing	This option proposes to introduce non-statutory guidance relating to urban design outcomes and on-site amenity. Although outcomes will not be guaranteed, these documents may influence urban design and amenity outcomes.

	Option 1 – Status quo	Option 2 – Statutory on-site amenity controls and urban design assessment	Option 3 – Non-statutory on-site amenity controls and urban design assessment
		for greater opportunities for residential development in existing parts of the City.	
Economic	No cost to Council of progressing a plan change through the statutory process. No consenting costs to establish residential activities in the Commercial Zone.	Increased density within the Commercial Zone, and increased height limits within parts of the Commercial Zone that fall within the Te Papa peninsula provide greater opportunity for residential development and economic returns associated with this.	No cost to Council of progressing a plan change through the statutory process. No consenting costs to establish residential activities in the Commercial Zone.
Social	Existing rules are retained, and community expectations are maintained.	Proposed rules allow for flexibility to provide for a variety of housing typologies within the Commercial Zone with improved on-site amenity requirements. These will enhance social well-being and vitality of communities in the Commercial Zone. Supports a 'live-work-play' lifestyle.	Potential for on-site amenity and urban design outcomes to be improved through the influence of non-statutory guidance.
Cultural	There is no change to the cultural environment through this option. Existing rules will apply to culturally significant areas and viewshafts.	There is no change to the cultural environment through this option. Existing rules will apply to culturally significant areas and viewshafts.	There is no change to the cultural environment through this option. Existing rules will apply to culturally significant areas and viewshafts.
Efficiency			
	Retaining the status quo does not achieve Objective 17A.7.2, and 17A.7.4 as it does not provide quality of housing in the Commercial Zone that provides a high amenity living environment on-site or provide a pleasant environment for future residents.	Option 2 provides for an efficient regulatory framework and achieves Objectives 17A.7.2 and 17A.7.4 as it includes provisions for on-site residential amenity controls to achieve a high standard of development that positively contributes to the desired levels of amenity for the zone and protect the health and well-being of residents in Commercial Zone. This option supports positive urban design outcomes and includes provisions to protect residential amenity, where amenity needs to be considered. These are supported by a new non-statutory design guideline providing further guidance and clearly outlining Council's expectations on the outcome that is being sought.	Option 3 is not the most efficient approach to achieving the objective. This is because there is no certainty that a non-statutory approach will lead to improved on-site residential amenity and urban design outcomes in the Commercial Zone and therefore is not considered to achieve Objectives 17A.7.2 and 17A.7.4.
Effectiveness			

	Option 1 – Status quo	Option 2 – Statutory on-site amenity controls and urban design assessment	Option 3 – Non-statutory on-site amenity controls and urban design assessment
	<p>Retaining status quo fails to effectively align the regulatory framework within the City Plan with the RPS and NPS-UD, in particular the requirements in Policies 2 and 3 around building heights, density and providing well-functioning environments.</p> <p>Option 1 will be ineffective in meeting objectives 17A.7.2 and 17A.7.4.</p>	<p>The proposed amendments give effect to the RPS and NPS-UD.</p> <p>This option is an effective means of achieving Objectives 17A.7.2 and 17A.7.4. It will ensure consideration is given to residential amenity provisions through the policies and rules and that urban design outcomes are addressed through assessment criteria.</p> <p>Given the statutory nature of this approach, it is likely that it will be successful in addressing issues around amenity and urban design in the Commercial Zone.</p>	<p>Voluntary on-site amenity guides are likely to lead to poor living environments for occupants. There is uncertainty as to whether a non-statutory approach would lead to achieving proposed Objectives 17A.7.2 and 17A.7.4 Residential activities within the Commercial Zone.</p> <p>Retaining height limits making urban design outcomes optional, does not give effects to NPS-UD, in particular the requirements in Policies 2 and 3 around building heights, density and providing well-functioning environments.</p>
Risk of acting or not acting			
<p>The risk of not acting is high. There is sufficient information and evidence from recent developments that indicate that residential amenity and urban design outcomes are not appropriately addressed in the Commercial Zone. The current approach does not address Objective 17A.7.2, 17A.7.3 and 17A.7.4.</p> <p>The existing regulatory framework has no standards for on-site amenity for residential activities in the Commercial Zone and as permitted activities, Council has no ability to influence or refuse consent for development that is poorly designed or does not achieve acceptable on-site amenity for future residents and therefore negative impact on community well-being.</p>			

11.2.5. Preferred option

Option 2 is the preferred option. The proposed package of provisions provided through Option 2 is considered the most effective and efficient way to achieve Objectives 17A.7.2, 17A.7.3 and 17A.7.4. The benefits of Option 2 outweigh the costs and provide quality housing in the Commercial Zone that provides a high amenity living environment on-site and contributes to a pleasant commercial environment for future residents.

Amendments to the provisions are required to give effect to the NPS-UD but also provides opportunities for more houses with appropriate controls to achieve a high standard of development that positively contributes the desired levels of amenity for the Commercial Zone. The proposed amendments provide for communities' social, and cultural well-being and gives effect to Section 7(c) of the RMA - the maintenance and enhancement of amenity values.

It is considered that Option 2 gives effect to the RPS, NPS-UD and is consistent with Part 2 of the RMA.

12. City Living Zone/ Te Papa Evaluation

12.1. Appropriateness of objectives

Objective or group of objectives:

The following existing objective as currently in the City Plan:

14D.1.2 Objective: Site Layout and Building Design in the City Living Zone

Development within the City Living Zone contributes to an urban landscape character, which is characterised by comprehensively designed, multi level, multi unit, urban housing and some mixed use activity within buildings on a landscaped site. Specific provision is made for suburban residential style development, including alterations and additions to existing residential activities as well as limited transitional development opportunities on existing sites (legally established and vacant or partially vacant as at the date of notification of the Plan being 17 October 2009).

The following amended objectives:

14D.1.1 Objective: Bulk and Scale of Buildings and Structures in the City Living Zone

Buildings and structures are of a bulk and scale that:

- a) *enables more intensive density residential development balanced with the urban landscape character, including the historic heritage values of The Elms, and Monmouth Redoubt, the open space character of Tauranga and Wharepai Domains and the Cliff Road reserve, and consistent with the planned urban built form and amenity for the zone;*
- b) *provides for suburban residential style development, including alterations and additions to existing residential activities, as well as limited transitional development opportunities on existing sites (legally established and vacant or partially vacant as at the date of notification of the Plan being 17 October 2009).*

14D.1.3 Objective: Density of Development in the City Living Zone –

Land within the zone is efficiently used to provide higher density residential development with some specific mixed use activity, that increases housing capacity and choice and pedestrian and cycle access to centres and public transport.

Category	Criteria	Comment
Relevance.	Directed to addressing a resource management issue.	<p>The proposed and existing objectives address resource management issue 2A.2.5 <i>Population Growth</i> as they provide opportunities for housing choice and a range of types of residential development.</p> <p>The proposed objectives also recognise that a certain level of amenity needs to be achieved in the City Living Zone and Suburban Residential Zone through urban design outcomes, bulk and location of buildings, site layout and building design.</p>
Relevance.	Focused on achieving the purpose of the Act (Part 2).	<p>The proposed objectives achieve the purpose of the RMA as they promote the sustainable management of natural and physical resources by enabling development of a variety of residential living opportunities and efficient use of land and facilitating the co-ordinated delivery of integrated, liveable and sustainable communities.</p> <p>The objectives will also ensure the efficient use and development of natural and physical resources (s7(b)) through providing for residential growth in both existing and greenfield areas of the city.</p> <p>The objectives also seek to incorporate high quality urban design outcomes and maintain and enhance amenity which will contribute towards achieving s7(c).</p>

Category	Criteria	Comment
Relevance.	Assists TCC in carrying out its statutory functions (s31).	The proposed objectives strike an appropriate balance to achieve the integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district and providing sufficient development capacity in respect of housing land to meet the expected demands of the district.
Relevance.	Within scope of higher-level documents.	<p>The proposed objectives will contribute towards giving effect to NPS-UD. See Appendix 2a for an assessment of how PPC26 gives effect to the NPS-UD.</p> <p>The proposed objectives will contribute towards giving effect to the RPS. See Appendix 2c for an assessment of how PPC26 gives effect to the RPS.</p>
Feasibility.	Acceptable level of uncertainty and risk.	The objectives present an acceptable level of uncertainty and risk. Learnings have been taken from other high growth Councils who have faced similar issues ³⁹ . Also, financial and architectural feasibility modelling ⁴⁰ and a development capacity assessment ⁴¹ has assisted with determining the approach.
Feasibility.	Realistically able to be achieved within council's powers, skills and resources.	The proposed objectives are realistically able to be achieved within Council's powers, skills and resources. PPC26 will provide a framework for these objectives to be achieved and it is up to developers, landowners and housing providers as to whether they take up these opportunities. Financial feasibility testing has indicated that, due to a number of factors many of which are outside of the Council's control, uptake will be slow and over a long period of time.
Acceptability.	Consistent with identified iwi/Maori and community outcomes.	<p>Engagement with Tangata Whenua has taken place since early 2019. Issues raised have been mostly outside of the scope of the plan change. However, there have been some comments/ questions around viewshafts and the Tauranga Moana Principles. See Appendix 3 for an assessment of the plan change against Iwi management plans and Appendix 10b for a report on the latest round of engagement with Tangata Whenua.</p> <p>Community engagement has been generally supportive for intensification in existing urban areas and increase the housing capacity and choice in existing urban areas. See Appendix 10c for a report on community and stakeholder engagement.</p>
Acceptability.	Will not result in unjustifiably high costs on the community or parts of the community.	The proposed objectives will reduce costs for applicants as the consenting process for duplex dwellings and CDD for terraced housing and apartments in the City Living Zone and Te Papa Housing Overlay will be more enabling, providing greater certainty and potential reduced consenting costs.

³⁹ Beca: Enabling Growth – Urban Zones Research: Key Observations, Findings and Recommendations, 10 August 2018

⁴⁰ Residential Intensification Concept Designs and proposed Plan Change Testing (Veros and designgroup stapleton elliot 2020)

⁴¹ Development Capacity Report, August 2020, Market Economics

12.2. Description of options

Three options for achieving the objectives have been identified.

12.2.1. Option 1 – Status quo

This option is to retain the framework currently within the Operative City Plan for the Te Papa peninsula this would include retaining the current City Living Zoning and the Suburban Residential Zone. Which includes the following:

- (a) City Living Zone - Comprehensively designed developments are a restricted discretionary activity non-notified providing that they can meet all the standards;
- (b) City Living Zone - Density provisions require minimum nett site area of 200m² per independent dwelling unit and no density limit if the site is at least 1050m² and can wholly contain a 25m diameter circle;
- (c) City Living Zone - Varying height limits of 9m, 13m and 19m over different areas;
- (d) Suburban Residential Zone - One independent dwelling unit per 325m² of nett site area, as a permitted activity;
- (e) Suburban Residential Zone - Secondary independent dwelling unit on a minimum 500m² nett site area as a permitted activity;
- (f) Suburban Residential Zone – Terrace, townhouse or apartment style development CDD in the Suburban Residential Zone is a discretionary activity and subject to RMA notification tests under s.95.

12.2.2. Option 2 – Enabling approach provided through a combination of the City Living Zone and new Te Papa Housing Overlay

This option will take the land use component of the Te Papa Spatial Plan and implement it through a new Te Papa Housing Overlay and the existing City Living Zone. Further details on why this approach has been adopted is covered in Appendix 8. This option will enable CDD in both the City Living Zone and the Te Papa Housing Overlay, enable duplex dwellings on smaller sites, while discouraging them through objectives and policies on larger sites to maximise land efficiency. The provisions that will apply include the following:

- (a) Increased heights (up to six storeys) in defined locations through the existing City Living Zone and the Te Papa Housing Overlay. These locations have been selected for their proximity to centres and public transport routes and also to give effect to the NPS-UD. Further details on extent of Te Papa Housing Overlay and proposed heights is covered in Appendix 8;
- (b) Remove minimum density and site size requirements;
- (c) Retain the restricted discretionary activity status for CDD in the City Living Zone. In addition, change the activity status from discretionary to restricted discretionary for CDD in the Suburban Residential Zone but identified as being in the Te Papa Housing Overlay. It is proposed to include a non-notification clause, providing that selected standards and assessment criteria can be achieved;
- (d) Introduce a new permitted activity 'duplex dwelling' on a minimum 400m² nett site area in the Te Papa Housing Overlay;
- (e) Where a CDD fails to comply with up to two permitted activity standards, the activity status will remain as restricted discretionary and more than two non-compliances will default to discretionary activity. RMA notification tests under s.95 will apply in these cases;

- (f) Amend some of the existing standards for the City Living Zone to make development more enabling through greater height limits and more relaxed overshadowing provisions;
- (g) Introduce a suite of new policies, rules and assessment criteria that have a focus on urban design outcomes. These are supported by a new non-statutory design guideline (ROF) to provide further guidance;
- (h) All applications for a CDD will be required to provide an engineering assessment of demand to ensure there is sufficient infrastructure capacity for water, wastewater and transport;
- (i) Subdivision to be in conjunction with, or following, land use/building consent.

12.2.3. Option 3 – Permissive approach enabling Duplex Dwelling and CDD as permitted activity

This option will take the land use component of the Te Papa Spatial Plan and implement it through a new Te Papa Housing Overlay and the existing City Living Zone. Further details on why this approach has been adopted is covered in Appendix 8. This option will enable CDD in both the City Living Zone and the Te Papa Housing Overlay and enable duplex and detached dwellings as permitted activities. The provisions that will apply include the following:

- (a) Provide for terraced housing and apartments as permitted activity in the City Living Zone and Te Papa Housing Overlay;
- (b) Provide for duplex and detached dwellings as permitted activity in the City Living Zone and Te Papa Housing Overlay;
- (c) Remove minimum density and site size requirements;
- (d) Non-statutory urban design and on-site amenity guidelines (ROF) with no clear link to City Plan;
- (e) Subdivision to be in conjunction with or following land use/building consent.

12.2.4. Evaluation of options to achieve the objectives

	Option 1 – Status quo	Option 2 – Enabling approach provided through a combination of the City Living Zone and new Te Papa Housing Overlay.	Option 3 – Permissive approach enabling Duplex Dwelling and CDD as permitted activity
Costs			
Environmental	<p>With projected growth, and in the absence of providing for increased intensification opportunities, there will continue to be pressure on expanding the City to greenfield areas. This will in turn have implications on the natural environment, and a continued reliance on car-based travel and higher emissions.</p> <p>Missed opportunity in terms of providing for greater density around amenities, centres, employment nodes and along public transport routes.</p> <p>Limited in how high-quality urban design outcomes can be achieved as there is no urban design guide or policies/ assessment criteria that can ensure the consideration of urban design matters.</p>	<p>Enabling greater housing density and variety may change the existing amenity and character of the Suburban Residential Zone in parts of Te Papa.</p>	<p>This option could lead to poor urban design outcomes, adverse effects on adjoining properties, the public realm and on-site amenity. These matters cannot be considered and assessed through a permitted activity status and would rely on a non-regulatory approach and the goodwill of applicants. This could lead to poor design outcomes and adverse effects on adjoining properties.</p> <p>This option will provide a permissive consenting framework for both detached and attached dwellings than currently provided for in the City Living Zone and Suburban Residential Zone. This option does not encourage alternative typologies such as duplexes and terraced/town houses as current research indicates that the preference for detached dwellings is expected to continue, but a slow shift towards attached dwellings is expected. Around 80% of the growth is expected to align with demand for detached houses.⁴² The risk remains that developers will continue to develop detached dwellings, or duplexes, on larger sites as a permitted activity and therefore forfeiting the opportunity for higher density development close to centres and public transport. This would result in an inefficient use of land and unusable or wasted space especially in areas recognised.</p>
Economic	<p>The City has approximately 18 months left of land supply. Not enabling additional housing development capacity in the City Living Zone and Te Papa peninsula will continue to put pressure on land supply. This is likely to have</p>	<p>Cost to Council of progressing the plan change.</p> <p>Cost of applying for a restricted discretionary resource consent for CDD and meeting urban design requirements.</p>	<p>Cost to Council of progressing the plan change.</p> <p>This option does not require each application to assess the proposed demand and infrastructure capacity and may result in unanticipated costs of</p>

⁴² Development Capacity Report, August 2020, Market Economics

	Option 1 – Status quo	Option 2 – Enabling approach provided through a combination of the City Living Zone and new Te Papa Housing Overlay.	Option 3 – Permissive approach enabling Duplex Dwelling and CDD as permitted activity
	<p>further implications in terms of housing affordability.</p> <p>High consenting costs and uncertainty associated with establishing a duplex dwelling or CDD as a discretionary activity in parts of the Te Papa peninsula. This may influence the viability and attractiveness of undertaking development as well as the cost of development and subsequently house prices.</p> <p>Housing affordability continues to be a challenge both in terms of home ownership and rents.⁴³ Home Ownership rates are decreasing and the number of renter households experiencing stress is increasing.⁴⁴</p> <p>Over the short term (2022), the bulk of demand for dwellings is at mid-price points (\$400,000-\$700,000).</p> <p>The analysis suggests that there is little feasible capacity (redevelopment, apartments) between \$500,000 and \$599,000 under business as usual (BAU) and most of the feasible capacity starts around \$800,000, i.e. towards the upper end of the demand profile. Over the medium term (to 2029) research suggests that under BAU, there will be a mismatch between the type of dwellings that are feasible, and the dwellings demanded by households.⁴⁵</p>		<p>upgrading infrastructure to accommodate growth within existing parts of the City.</p>

⁴³ Page 8, Housing Demand and Need in Tauranga and Western Bay of Plenty, November 2017

⁴⁴ Page 16, TUS

⁴⁵ Development Capacity Report, August 2020, Market Economics

	Option 1 – Status quo	Option 2 – Enabling approach provided through a combination of the City Living Zone and new Te Papa Housing Overlay.	Option 3 – Permissive approach enabling Duplex Dwelling and CDD as permitted activity
Social	<p>This option retains the low-density nature of the Suburban Residential Zone through primarily single detached dwellings. This will limit the range of housing types and price points available.</p> <p>Provides less opportunity for people to live within close proximity to shops, employment, open space and public transport.</p> <p>In Tauranga City, couples without children are projected to increase by 11,800 or 70% and one-person occupied dwellings by 11,000 or 83% between 2017 and 2047. These changes signal a challenge to the historic typology of predominately three-bedroom homes on large sections. There is an increasing need to provide smaller homes which can most efficiently be delivered on smaller sections or as multi-unit buildings.⁴⁶</p>	<p>Potential effects on existing neighbourhood character and amenity as area identified in Te Papa Housing Overlay transitions from their current low-density form to a new built form over time.</p>	<p>Potential effects on adjoining properties and surrounding land uses as a result of intensification in existing low-density Suburban Residential Zone being allowed. With permitted activity status Council has no ability to assess each application on a site by site basis and ensure quality off-site and on-site amenity is achieved.</p> <p>Potential risk that there will continue to be a mismatch between the type of dwellings that are feasible, and the dwellings demanded by households.</p> <p>This option may result in poor living conditions and associated social issues as a result of high-density residential developments that do not achieve quality urban design outcome.</p>
Cultural	<p>There is no change to the cultural environment through this option. Existing rules will apply to culturally significant areas.</p> <p>Outcomes agreed through the Te Papa Spatial Plan with Tangata Whenua may not be realised under Option 1.</p>	<p>Further intensification and development of land around sites of cultural significance.</p>	<p>Further intensification and development of land around sites of cultural significance.</p>
Benefits			
Environmental	<p>Amenity and character of existing residential areas will be retained.</p> <p>There is no change to the Natural Environment provisions proposed through this option. Existing rules will apply to Special Ecological Areas.</p>	<p>This option allows for flexibility to provide for a variety of housing typologies within the City Living Zone and Te Papa Housing Overlay. By providing for intensification of existing residential areas supports sustainable management of physical resources and provides for good urban form through compatible land uses.</p> <p>Infrastructure modelling indicates that there is capacity in the existing trunk network to cater for infill uptake</p>	<p>This option allows for flexibility to provide for a variety of housing typologies within the City Living Zone and Te Papa Housing Overlay to meet objectives within the City Plan.</p> <p>Providing for intensification of existing residential areas supports sustainable management of physical resources and provides for good urban form through compatible land uses.</p>

⁴⁶ Page 21, Housing Demand and Need in Tauranga and Western Bay of Plenty, November 2017

	Option 1 – Status quo	Option 2 – Enabling approach provided through a combination of the City Living Zone and new Te Papa Housing Overlay.	Option 3 – Permissive approach enabling Duplex Dwelling and CDD as permitted activity
		<p>anticipated in the City Living Zone and Te Papa Housing Overlay. Where there may be capacity constraints in the local network this will be assessed through the consent process. See Appendix 9 for further details on this modelling.</p> <p>Requiring more intensive development to obtain resource consent with objectives that link to a design guide may lead to better environmental outcomes including protection of amenity, sustainability and efficiency, with regard to water efficiency, incorporating sustainable water solutions, renewable energy and building orientation.</p> <p>There is no change to the Natural Environment provisions proposed through this option. Existing rules will apply to Special Ecological Areas.</p>	<p>There is no change to the Natural Environment provisions proposed through this option. Existing rules will apply to Special Ecological Areas.</p>
Economic	<p>No cost to Council of progressing a plan change through the statutory process.</p>	<p>Providing a simpler compliance approach will reduce costs to those developing within the City Living Zone and Te Papa Housing Overlay.</p> <p>This option provides a significant amount of (plan enabled) redevelopment capacity for attached dwellings and apartments. The Development capacity assessment attached in Appendix 5 indicates that a large share of the future feasible capacity will become available over the medium term.</p> <p>The relative structure of the housing market is expected to remain relatively stable with standalone houses (detached dwellings) remaining the largest component, accounting for 82% of dwellings. But this share will slowly be eroded, due to increases in attached dwellings, dropping to 80%. This increase in share will be delivered because of an increase in attached developments.⁴⁷ This is also becoming apparent through recent resource consent application for attached dwellings, that align with the changes proposed through PPC26, and are using the more complex consenting pathway as a discretionary activity which suggest that there is a demand for these</p>	<p>This option provides a significant amount of (plan enabled) redevelopment capacity for attached dwellings and apartments.</p> <p>Increasing land supply for intensification will support employment opportunities. In addition, employment opportunities would arise from construction activity.</p> <p>Enabling duplex dwellings and CDD as permitted activity in the City Living Zone and Te Papa Housing Overlay reduces costs and time associated with resource consents for developers.</p>

⁴⁷ Development Capacity Report, August 2020, Market Economics

	Option 1 – Status quo	Option 2 – Enabling approach provided through a combination of the City Living Zone and new Te Papa Housing Overlay.	Option 3 – Permissive approach enabling Duplex Dwelling and CDD as permitted activity
		types of development and are feasible in the current market. Increasing land supply for intensification will support employment opportunities. In addition, employment opportunities would arise from construction activity.	
Social	Existing rules are retained, and community expectations are maintained.	This option supports positive urban design outcomes and includes provisions to protect residential amenity. Provides for more people to live closer to the central city and existing centres in Te Papa, and close to amenities, parks and public transport, taking advantage of investment in existing infrastructure. It also allows people to choose to live in a range of housing types depending on their lifestyle. Will contribute towards achieving the targets for housing development capacity as set out in Section 2A.3 of the City Plan.	Provides for more people to live closer to the central city and existing centres in the Te Papa peninsula, and close to amenities, parks and public transport. It also allows people to choose to live in a range of housing types depending on their lifestyle. Will contribute towards achieving the targets for housing development capacity as set out in 2A.3 of the City Plan.
Cultural	There is no change to the cultural environment through this option. Existing rules will apply to culturally significant areas and viewshafts.	There is no change to the cultural environment through this option. Existing rules will apply to culturally significant areas in the Te Papa Peninsula. Enables more intensive housing opportunities on Maori owned or Treaty settlement land within the Suburban Residential Zone and the Te Papa Peninsula. Outcomes agreed through the Te Papa Spatial Plan with Tangata Whenua are implemented.	There is no change to the cultural environment through this option. Existing rules will apply to culturally significant areas in the City Living Zone and Te Papa Housing Overlay.
Efficiency			
	Retaining the status quo will continue to provide a complex consenting approach for CDD in Te Papa Housing Overlay and restrictive requirements in the City Living Zone. There are restrictive performance standards in the City Living that are difficult to achieve.	Greater certainty provided through a simpler consenting regime for duplex dwelling and CDD, with a starting point of non-notification for CDD that can meet all the development standards. Proposed rules allow for flexibility to provide for a variety of housing typologies within the City living Zone and Te	Greater certainty provided through the permitted activity status for duplex dwelling and CDD. This option will partially address the objectives in the City Plan. This approach provides an efficient planning framework to achieve housing choice outcome but inefficient to achieve urban design outcomes and protect the residential amenity of existing urban areas.

	Option 1 – Status quo	Option 2 – Enabling approach provided through a combination of the City Living Zone and new Te Papa Housing Overlay.	Option 3 – Permissive approach enabling Duplex Dwelling and CDD as permitted activity
	<p>Density bonus has had little uptake (sites over 1050m² have no density restrictions otherwise 200m² minimum applies).</p> <p>It is an inefficient approach having impacts on the consenting process and certainty for developers seeking to provide urban growth.</p>	<p>Papa Housing Overlay to meet objectives within the City Plan.</p> <p>This approach provides an efficient planning framework. Allowing for appropriate infill with the inclusion of objectives relating to design outcomes, ensures the efficient use of land and compatible land uses. These objectives are supported by a non-statutory design guideline to improve efficiency within the consent process by clearly outlining Council's expectations for information to be submitted.</p> <p>It is considered that the proposed amendments outlined in Option 2 provide for an efficient regulatory framework to deliver intensification in the existing urban growth area suitable for greater forms of built development.</p>	
Effectiveness			
	<p>Retaining status quo fails to effectively align the regulatory framework with the City Plan, the RPS and NPS-UD and demographic and household changes that have occurred over time within Tauranga City.</p> <p>It will also not respond to demographic and household changes that have occurred over time within Tauranga City.</p> <p>Will not deliver on the targets for housing development capacity as set out in Section 2A.3 of the City Plan and RPS.</p> <p>Essentially, Option 1 is ineffective and unsatisfactory to meet the objectives of the plan change.</p>	<p>Option 2 is likely to be successful in achieving the objectives and addressing the problem the plan change has set out to address. The objectives, policies, rules and assessment criteria provide for multi-units on a site as a restricted discretionary activity to provide for greater choice in housing typology while also restricting discretion to provide for effective protection of residential amenity values and create good design outcomes.</p> <p>It will effectively align the regulatory framework within the City Plan and give effect to the RPS and NPS-UD.</p> <p>The infrastructure capacity information requirement and assessment criteria provide Council with the ability to assess each application on its own merits as a restricted discretionary activity.</p> <p>This option proposes to add additional objectives and policies in both the City Living Zone and Te Papa Housing Overlay that seek to avoid inefficient residential development that fail to maximise the development potential of each site and compromises the future development of the site. This supports sustainable</p>	<p>Option 3 aligns with the RPS and NPS- UD and demographic and household changes that have occurred over time within Tauranga City. However, there is no ability to assess each application on its merits to ensure that good design outcomes are achieved and any adverse effects on the environment and social well-being are avoided, remedied, or mitigated.</p> <p>There are benefits in terms of enabling development through a permitted activity status, particularly around cost savings and certainty for applicants. However, this option would not enable the consideration of urban design outcomes, infrastructure capacity and land efficiency. This may result in a high cost to the community and Council.</p> <p>Essentially, Option 3 is ineffective and unsatisfactory to meet the objectives of the proposed plan change.</p>

	Option 1 – Status quo	Option 2 – Enabling approach provided through a combination of the City Living Zone and new Te Papa Housing Overlay.	Option 3 – Permissive approach enabling Duplex Dwelling and CDD as permitted activity
		<p>management of physical resources and provides for good urban form through compatible land uses.</p> <p>It is considered that the proposed amendments to the City Plan provide an effective approach to delivering the objectives of PPC26.</p>	
Risk of acting or not acting			
<p>The risk of not acting is high. A review of the residential provisions of this nature has not been undertaken since the last City Plan review that commenced in 2008. There is sufficient information to indicate that housing capacity and affordability continues to be a significant issue in Tauranga City⁴⁸ and the current approach to the Te Papa peninsula does not address Issue 2A.2.5 Population Growth, Objectives 14A.1.1, 14A.1.2, 14D.1.1, 14D.1.2, 14D.1.3.</p> <p>The existing regulatory framework for duplex dwelling and CDD provides for a complex, time consuming and expensive consenting regime with potential uncertainty and does not support increased density in well-connected areas along the Te Papa peninsula. There is a risk that if no action is taken then this regime will not allow the full potential for residential intensification in existing parts of the City to be realised and therefore the targets in Section 2A.3 of the City Plan will not be achieved.</p>			

⁴⁸ Tools for increasing social and affordable housing in the Western Bay of Plenty, Research for the Urban Form and Transport Initiative, March 2020; Corelogic, Ministry of Housing and Urban Development Capacity Dashboard; Western Bay Sub-Region Residential Development Capacity Review, Veros, May 2019; Development Capacity Report, August 2020, Market Economics

12.2.5. Preferred option

Option 2 is the preferred option. The proposed package of provisions provided through option 2 is considered the most effective and efficient way to achieve Objectives 14A.1.1, 14A.1.2, 14D.1.1, 14D.1.2 and 14D.1.3. The benefits of option 2 outweigh the costs and provide a balance between providing an enabling framework that includes a non-notified restricted discretionary status for CDD and allowing consideration of urban design outcomes and infrastructure capacity, which is particularly important where higher density forms of development are being introduced into existing neighbourhoods.

This approach provides an efficient planning framework. Allowing for appropriate infill with the inclusion of objectives relating to design outcomes, ensures the efficient use of land and compatible land uses. It also supports sustainable management of physical resources and provides for good urban form through compatible land uses and increased opportunities an efficient use of land for dwellings.

It is noted that there is not a significant shift in policy direction for the City Living Zone. However, to give effect to the NPS-UD, there are areas identified in the Te Papa Housing Overlay that may see substantial changes to the existing built form in the area that is characterised by single storey detached residential dwelling. Consequently, amendments to the existing objectives and policy wording is required to give effect to the NPS-UD but also provides for intensification in established residential areas that may not necessarily maintain the character of the area, but through the proposed provisions and matters of discretion will ensure that they are compatible with the established character.

The provisions respond to Council's obligation (Section 31 (1)(aa)) for "the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district".

The proposed amendments provide for communities' social, and cultural well-being and gives effect to Section 7(c) of the RMA - the maintenance and enhancement of amenity values.

It is considered that option 2 gives effect to the RPS, NPS-UD and is consistent with Part 2 of the RMA.

13. Detailed evaluation of proposed provisions for preferred approach

The key provisions that apply to the preferred option are discussed below in groups of related provisions.

13.1. Chapter 3 – Definitions

Definition	Comment
Definitions amended <ul style="list-style-type: none"> comprehensively designed development (Suburban Residential Zone - outside of urban growth areas); comprehensively designed development (City Living Zone). 	<p>The proposed amendments are minor changes to existing definitions that are intended to improve clarity without making substantial changes to the meaning.</p> <p>The proposed amendment to comprehensively designed development (Suburban Residential Zone - outside of urban growth areas) and comprehensively designed development (City Living Zone) provides clear distinction between what is considered to be a duplex dwelling and comprehensively designed development within the Suburban Residential Zone – outside of urban growth areas). Two attached units are considered to be a duplex dwelling whereas two or more detached, or three or more attached independent dwelling units on a site are to be considered a CDD. Where the maximum development density of 1 independent dwelling unit per 325m² of nett site area can be met, the existing rules will continue to apply for detached dwellings.</p>
New definitions <ul style="list-style-type: none"> Apartment building; comprehensively designed development (Te Papa Housing Overlay); duplex dwelling; terrace housing; waste management area. 	<p>The definitions of these terms are required for the Plan's ease of use and efficient administration.</p> <p>The use of apartment building and terrace housing have been used in the objectives and policies for the Suburban Residential Zone as well as the definition for CDD. The intention is that apartment building is a high density building form and not considered to be appropriate in the Suburban Residential Zone. Whereas Terrace housing is considered to be compatible through appropriate design.</p> <p>Duplex dwelling and comprehensively designed development (Te Papa Housing Overlay), have been introduced as part of this plan change with an associated rule framework. The addition of relevant definitions will provide clarity and certainty to plan users of what is meant by the terms.</p> <p>A dedicated waste management area is required with higher density housing. The addition of a new definition will provide clarity and certainty to plan users on what this area is to be used for.</p> <p>Clear definitions assist with the orderly administration of the City Plan. Adding these new definitions provides certainty and improves the usability of the Plan.</p>
New definitions <ul style="list-style-type: none"> nett internal floor area. 	<p>The term nett internal floor area is proposed as part of a new provision requiring minimum dwelling sizes. The proposed definition aligns with the National Planning Standard definition for net floor area. Adding the definition will provide clarity and certainty to plan users.</p>
New definitions <ul style="list-style-type: none"> Natural Hazard Susceptibility. 	<p>The term Natural Hazard Susceptibility is proposed as a definition to identify the grouping of natural hazards and their extent (erosion, inundation, liquefaction/lateral spread) where the application of PPC26 (duplex dwellings and comprehensively designed development within the suburban residential zone – outside urban growth areas and the Te Papa Housing Overlay), is not provided for. The identification of the area where 'Natural Hazard Susceptibility' is defined as, is provided for in the specific natural hazards assessment, and associated risk assessments undertaken in accordance with the RPS.</p>

13.2. Chapter 4 – General rules

Policy	Rule/Assessment Criteria	Comment
<p>Policy 4B.1.1.1 – On-Site Parking Policy</p> <p>4B.1.3.2 On-site Parking Requirements.</p> <p>4B.1.3.5 Bicycle Parking Requirements.</p>	<p>4B.2.14 Bicycle Parking Requirements.</p> <p>Appendix 4S General Minimum On-Site Bicycle Parking Requirements.</p>	<p>Amendments are required to Policy 4B.1.1.1 to remove reference to on-site parking requirements to give effect to the NPS-UD. The proposed amendments support alternative modes of transport and ensure that the proposed number of vehicle parking meets demand.</p> <p>Amendments were required to Policy 4B.1.3.2 so that it provides for the safe and efficient movement of cyclists on the site.</p> <p>A new policy is proposed (4B.1.3.5) to support the increase in cycling through bicycle parking and facility requirements as set in accordance with Rule 4B.2.14 and Appendix 4S. The bicycle parking rates are in accordance with the recommendations outlined in the transportation report attached in appendix 9b.</p> <p>Requiring bicycle parking supports the reduction of car-based travel, promoting more active travel modes and potential to reduce emissions.</p>

13.3. Chapter 12 – Subdivision, services and infrastructure

Policy	Rule/Assessment Criteria to implement policies	Comment
Policy 12A.1.1.4 Allotment Sizes. Policy 12B.1.1.3 Undersized Allotments and intensification. Policy 12B.1.1.1 Subdivision in the Residential Zones. Policy 12B.1.1.3 Undersized Allotments and Intensification. Policy 12B.1.2.1 Residential Subdivision: City Living.	Update activity status in Table 12A.1. 12A.5 Controlled Activity Rules. 12A.8 Non-Complying Activities. 12B.6 Non-Complying Activity Rules. 12B.4.1 Non – Notification.	<p>Policy 12A.1.1.4 ensures that the allotments created are consistent with the purpose of the underlying zone or align with an approved land use consent for a CDD or lawfully established duplex dwelling.</p> <p>Controlled activity status is proposed for subdivision of duplex dwellings where a code compliance certificate under section 95 of the Building Act 2004 has been issued. This approach provides certainty of outcome to applicants and outcome of built form for Council. Consideration was also given to requiring a consent notice to be registered against any new titles created to ensure that a duplex dwelling is constructed on the site. This avoids the subdivision of undersized vacant allotments, in accordance with Policy 12B.1.1.3. Consent notices are considered to be appropriate where a condition of subdivision consent is required to be complied with on a continuing basis which would not be the case in this instance.</p> <p>Restricted activity status is proposed for comprehensively designed developments. This is consistent with Policies 12A.1.1.4, 12B.1.1.1 and 12B.1.2.1 which seek to provide for subdivision of allotment sizes that are consistent with any landuse consent. The intention of CDD is that landuse consent is undertaken prior to or in conjunction with a subdivision consent. The preferred approach is that the activity status for this type of subdivision would be a controlled activity status. However legal advice confirms that a rule in a district plan cannot set activity status according to whether that activity is in compliance (or not) with another resource consent. It was recommended that the activity status falls to restricted discretionary and to include a matter of discretion that requires consistency with the land use consent. This approach ensures integration between land use and subdivision and consistency with Policies 12A.1.1.4, 12B.1.1.1 and 12B.1.2.1.</p>
Policy 12B.1.1.3 undersized allotments and intensification.	Rule 12B.3.1.1 Minimum Allotment Size.	Amendments were required to this Policy and associated rule as the cross reference to Chapter 14 is no longer relevant. The proposed change assists with the orderly administration of the City Plan.
Policy 12B.1.1.1 Subdivision in the Residential Zones.	Rule 12A.5.1.3 Allotments to Accommodate Lawfully Established Activities.	Policy 12B.1.1.1 provides clear direction that a code compliance certificate is required prior to subdivision of duplex dwelling. This is implemented through Rule 12A.5.1.3.

Policy	Rule/Assessment Criteria to implement policies	Comment
<p>Policy 12A.1.1.4 Allotment Sizes.</p> <p>Policy 12B.1.1.1 Subdivision in the Residential Zones.</p> <p>Policy 12B.1.2.1 Residential Subdivision: City Living.</p>	<p>Rule 12B.4.2.3 Sequencing of Comprehensively designed development in the City Living Zone and Suburban Residential Zone - outside of urban growth areas.</p> <p>Rule 12B.4.3.6 Comprehensively designed developments in the City Living Zone, Te Papa Housing Overlay and Suburban Residential Zone – outside of urban growth areas.</p>	<p>Policies 12A.1.1.4, 12B.1.1.1 and 12B.1.2.1 provides clear direction that subdivision of a comprehensively designed development needs to be consistent with an approved landuse consent. This is implemented through Rules 12B.4.2.3 and 12B.4.3.6.</p>

13.4. Chapter 14 – Residential Zone

The table below provides a summary of the changes proposed to the policies. How these policies are being implemented in the Suburban Residential Zone, City Living Zone and Te Papa Housing Overlay is discussed further in Sections 13.5 - 13.7.

Policy	Comment
Policy 14A.1.1.2 Urban Form and Consolidation. Policy 14A.1.1.4 Urban Form and Intensification. Policy 14A.1.2.1 Residential Diversity and Densities.	<p>The amendments to Policies 14A.1.1.2 and 14A.1.1.4 reflect the proposed outcomes sought by the objectives to guide decision makers and set courses of action to achieve the desired end state of increased housing capacity and variety. It is proposed to amend the wording from 'maintaining the character and amenity' to refer to 'the planned built form'. This gives effect to the wording in the NPS-UD but also acknowledges that there will be intensification occurring in established residential areas that may not necessarily maintain the character of the area, but through the proposed provisions and matters of discretion will ensure that they are compatible with the established character. The more enabling provisions would provide opportunities for more houses and variety of housing types.</p> <p>It is proposed to amend Policy 14A.1.1.2 to encourage increased housing choice and maximise land efficiency near centres and public transport to reflect the direction of the NPS-UD. The provisions promote the efficient use of land and supporting infrastructure.</p> <p>It is proposed to amend Policy 14A.1.1.4 to remove cross reference to another policy that is proposed to be deleted as part of Plan Change 26.</p> <p>Policy 14A.1.2.1 sets a course of action to contribute to the desired end state of increased housing capacity and variety in targeted areas. A minor change is required to this policy to remove the phrase 'through zoning' to acknowledge that the Te Papa Housing Overlay provides for greater densities but with an underlying zoning of Suburban Residential Zone.</p> <p>This approach aligns and gives effects to the NPS-UD, TUS and FDS.</p> <p>The provisions respond to Council's obligation (Section 31 (1)(aa)) of the RMA for "the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district".</p>
Policy 14A.1.1.5 Site and Context. Policy 14A.1.1.6 Public Realm Interface. Policy 14A.1.1.7 Public Realm Interface. Policy 14A.1.1.8 Private Residential Amenity. Policy 14A.1.1.9 Residential Interface. Policy 14A.1.1.10 Safety and Security. Policy 14A.1.1.11 Choice, Resilience and Flexibility. Policy 14A.1.1.12 Sustainability.	<p>The proposed new policies specify a course of action to achieve high quality on and off-site amenity. The policies link to the outcomes identified in the Residential Outcomes Framework and encourage development that achieves high quality on-site amenity and buildings that that relate well to their immediate and wider surroundings.</p> <p>The NPS-UD seeks to provide sufficient development capacity to meet the different needs of people and communities and requires district plans to make room for growth both 'up' and 'out' and that rules are not unnecessarily constraining growth. This includes enabling up to 6 storeys in areas that adjoin city centre zones and existing and planned rapid transit stops. Along the Te Papa peninsula, these areas are located within established residential areas largely comprising of single and two storey dwellings. The proposed new policies, alongside corresponding provisions, assessment criteria and matters of discretion, seek to manage any potential adverse effects associated with more intensive densities and built form so that they are compatible with the existing character and adjoining properties.</p> <p>The benefits of these policies are that high-quality residential amenity is protected both on-site and off-site.</p>

Policy	Comment
	<p>This provision provides for communities' social, and cultural well-being and gives effect to Section 7(c) of the RMA - the maintenance and enhancement of amenity values.</p> <p>The alternative approach is to rely solely on building envelope and development standards, resulting in weaker consideration of existing residential amenity, this would provide greater risk of adversely affecting residential amenity.</p>
<p>Policy 14B.1.1.1 Bulk and Scale of Buildings in the Suburban Residential Zone and Large Lot Residential Zone – Building Height and overshadowing .</p> <p>Policy 14B.1.2.1 Site Layout and Building Design in the Suburban Residential Zone and Large Lot Residential Zone.</p> <p>Policy 14B.1.3.1 Density of Development – Suburban Residential Zone and Large Lot Residential Zones.</p>	<p>The amendments to Policy 14B.1.1.1 seek to remove the word 'avoid' and replace with 'mitigate'. This is in response to case law but also acknowledges that in some areas it may be appropriate to provide for greater heights and overshadowing on surrounding dwellings where these effects can be mitigated or managed to an acceptable level. This change is further supported by proposed new criteria e) to Policy 14B.1.1.1 that ensures that a reasonable standard of sunlight access and privacy is achieved and is particularly important with increased densities and built form.</p> <p>Changes are proposed to Policy 14B.1.2.1 to give effect to the wording in the NPS-UD and sets a course of action to contribute to the desired end state of increased housing capacity and variety in targeted areas. The proposed additional criteria seek to protect the on-site amenity as well as adjacent sites that may otherwise be compromised through providing greater densities that are now enabled on the site.</p> <p>Substantial amendments are proposed to Policy 14B.1.3.1 to reflect the proposed outcomes sought by the objectives to guide decision makers and set courses of action to achieve the desired end state of increased housing capacity and variety. It acknowledges that higher densities and greater built form are enabled in areas adjacent to centres and public transport within the Te Papa Housing Overlay. The provisions promote the efficient use of land and supporting infrastructure.</p> <p>It is proposed to remove Policy 14B.1.3.2 in its entirety as the current wording of this policy refers to 'medium density' development which is defined in the City Plan as: <i>For the purpose of residential density means areas characterised by a mix of housing types including attached units, town houses and apartment buildings with a maximum density of 1 independent dwelling unit per 200m² of gross site area.</i> As part of Plan Change 26 it is proposed to remove minimum densities for comprehensively designed development which does not align with the existing definition and therefore retaining this policy would create confusion for Plan users and decision makers. Consideration was given to amending the existing 'medium density' definition, however this would have significant consequential amendments on sections of the city plan. Therefore, it is proposed to retain the definition but to amend any references as part of Plan Change 26 to 'higher densities' which incorporates any densities greater than 1/325m² that is currently provided for in the Suburban Residential Zone.</p> <p>The more enabling provisions would provide opportunities for more houses and variety of housing types. Economic and employment opportunities would arise from construction activity.</p>

Policy	Comment
<p>Policy 14B.1.1.2 Bulk and Scale of Buildings in the Te Papa Housing Overlay.</p> <p>Policy 14B.1.2.2 Site and Building Design in the Te Papa Housing Overlay.</p> <p>Policy 14B.1.32.2 Density of Development in the Te Papa Housing Overlay.</p>	<p>These new policies cross reference to the corresponding policy in Chapter 14D City Living Zone and acknowledge that the anticipated outcome in these two areas are the same, however for the reasons discussed earlier, the identified Te Papa housing area sits as an overlay over the Suburban Residential Zone. It is anticipated that this will be updated through the full City Plan review.</p>

13.5. Duplex Dwelling - Suburban Residential Zone

Policy	Rule/Assessment Criteria to implement policies	Comment
<p>Policy 14A.1.1.2 Urban Form and Consolidation.</p> <p>Policy 14A.1.1.4 Urban Form and Intensification.</p> <p>Policy 14A.1.2.1 Residential Diversity and Densities.</p> <p>Policy 14B.1.3.1 Density of Development – Suburban Residential Zone and Large Lot Residential Zones.</p>	<p>Update Activity Status in Table 14B.1 to make Duplex Dwelling Permitted Activity.</p> <p>14B.6(n) Restricted Discretionary Activity Rules.</p> <p>14B.7(p) Discretionary Activity Rules.</p>	<p>It is proposed to amend the activity status table for duplex dwelling from discretionary to permitted providing that all the development standards can be met and that it is not located in an area identified for their high natural hazard risk.</p> <p>To give effect to the natural hazard objective within the RPS, exclusions are proposed of where the proposed plan change will apply. Particularly areas subject to three hazards (erosion, inundation and liquefaction/lateral spread) will be excluded from the proposed plan change. By doing so, a precautionary approach via an avoidance risk management measure is implemented. Flooding will be addressed through a rule framework in PPC27.</p> <p>This enables a duplex dwelling without needing a consent and provide more certainty for developers. The more enabling provisions would provide opportunities for more houses and two attached houses where the effects can be managed through permitted rule standards.</p> <p>It is proposed to apply a stepped approach, where a duplex dwelling does not comply with up two standards it becomes a Restricted Discretionary Activity and for three or more non-compliances, the proposal becomes a Discretionary Activity. This approach assumes that for up to two non-compliances, the effects of each non-compliance can be effectively assessed through the discrete assessment criteria, whereas more than three non-compliances will require the additional assessment of cumulative effects. This approach provides for innovation and flexibility whilst retaining some certainty for both developers and Council's.</p> <p>The provisions respond to Council's obligation in the RMA (Section 31 (1)(aa)) for <i>"the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district"</i>.</p>
	<p>14B.3.17.2 Residential Development Density – Duplex Dwelling in Suburban Residential Zone.</p> <p>Activity Status Table 14B.1 - Secondary Independent Dwelling Unit.</p> <p>Rule 14B.3.13 Secondary Independent Dwelling Units.</p>	<p>It is proposed to allow for one duplex dwelling on a minimum site size of 400m². Architectural testing was undertaken on both 325m² and 400m² sites using a range of floor areas, bedroom numbers and storeys, and the results indicated that a single storey duplex dwelling, requires a 400m² site to be able to meet the proposed</p>

Policy	Rule/Assessment Criteria to implement policies	Comment
		<p>permitted standards. See Appendix 14 for architectural testing plans.</p> <p>The City Plan currently has a provision which permits secondary independent dwelling units (SIDU) to be developed on an allotment along with a principle 'independent dwelling'. Current difficulties in assessing and defining independent dwellings and SIDU are causing issues for multiple staff and departments across TCC and confusion for the wider community of how the rule should be applied.</p> <p>For the reasons discussed in the memorandum attached in Appendix 12, it is proposed to amend the activity status that secondary independent dwelling units do not apply in the Suburban Residential Zone and update Rule 14B.3.13 to reflect this. The proposed new rules provide a more enabling framework for attached units.</p> <p>The proposed amendments promote the efficient use of urban land and enable different building types and greater densities in this zone.</p>
<p>Policy 14B.1.1.1 Bulk and Scale of Buildings in the Suburban Residential Zone and Large Lot Residential Zone.</p> <p>Policy 14B.1.2.1 Site and Building Design - Suburban Residential Zone and Large Lot Residential Zone.</p> <p>Policy 14B.1.3.1 Density of Development - Suburban Residential Zone and Large Lot Residential Zone.</p>	<p>Rule 14B.3.2 Building Height - Suburban Residential Zone; Large Lot Residential.</p> <p>Rule 14B.3.3 Streetscape – - Suburban Residential Zone; Large Lot Residential.</p> <p>Rule 14B.3.4 Setback - Suburban Residential Zone; Large Lot Residential.</p> <p>Rule 14B.3.7 Site Coverage – Suburban Residential Zone.</p>	<p>These rules work as a package to define the building envelope, controlling the scale of buildings to reduce the potential visual dominance and overshadowing effects of a duplex dwelling. It is proposed to retain the bulk and scale of what is currently permitted for <i>independent dwelling units</i> in the Suburban Residential Zone.</p> <p>The benefits of retaining these provisions are that residential amenity is maintained and the built form is consistent with existing community expectations. The provisions continue to provide for communities' social, economic and cultural well-being.</p> <p>Through PPC27 it is proposed to amend Rule 14B.3.7 to include a maximum impervious surface percentage to reduce the risk of flooding to life, property and infrastructure from intense rainfall events in Tauranga over time.</p> <p>More 'enabling' building envelope and development standards were considered, however this would result in potentially weaker protection of residential amenity.</p>
<p>Policy 4B.1.2.2 – Maintaining Road Function.</p>	<p>Rule 14B.3.9 – Access - Suburban Residential Zone; Large Lot Residential.</p>	<p>It is proposed to retain the number of independent dwelling units, homestays or shared accommodation that can be served by private rights of ways, private accessway or legal access.</p>

Policy	Rule/Assessment Criteria to implement policies	Comment
		For the purposes of enabling duplex dwellings in the Suburban Residential Zone – this rule is still considered to be appropriate and will remain consistent with other development in the Suburban Residential Zone. Acknowledging that this will be reviewed through the City Plan review where a zone-wide approach will be considered.
Policy 14B.1.2.1 Site and Building Design - Suburban Residential Zone and Large Lot Residential Zone. Policy 14A.1.1.6 Public Realm Interface.	Rule 14B.3.17.3 Setbacks – Traffic Management – Duplex Dwelling in Suburban Residential Zone.	It is proposed to increase the setback of garages/carports with direct vehicle access to a road from 4.5m to 5m to ensure that the space is sufficient for a car to park in front of a garage without overhanging onto the adjacent footpath. This maintains the safety of pedestrian movements along the adjoining roading network.
Policy 14B.1.1.1 Bulk and Scale of Buildings in the Suburban Residential Zone and Large Lot Residential Zone. Policy 14B.1.2.1 Site and Building Design - Suburban Residential Zone and Large Lot Residential Zone. Policy 14B.1.3.1 Density of Development - Suburban Residential Zone and Large Lot Residential Zone. Policy 14A.1.1.9 Residential Interface.	Rule 14B.3.17.4 Overshadowing – Duplex Dwellings in Suburban Residential Zone.	<p>It is proposed to retain the building envelope as currently provided for in the Suburban Residential Zone, but making an allowance for where the encroachment adjoins a boundary that forms part of a pedestrian/vehicle access lot, the control applies to the opposite side of the access lot. It acknowledges that these lots are used for access only and are not areas of high amenity. The amendment provides for flexibility and the efficient use of urban land.</p> <p>The efficiency of the proposed amendment is high because the benefits outweigh the costs.</p>
Policy 14B.1.2.1 Site and Building Design - Suburban Residential Zone and Large Lot Residential Zone. Policy 14A.1.1.8 Private Residential Amenity.	Rule 14B.3.17.5 Outdoor Living Area – Duplex Dwellings in Suburban Residential Zone.	<p>It is proposed to reduce the size of the minimum outdoor living areas but require it to be directly accessible by an indoor living area and that a dedicated space (capable of containing a 4 metre diameter) is located entirely in the North, North East or North West aspect of the site to provide access to sunlight and make it a more useable space. A new appendix is proposed that provides further clarification on what is meant by North, North East and North West (Appendix 14J). This is to ensure that while the space is smaller, it is useable.</p> <p>This contributes to achieving high quality on-site amenity for future residents and provides for communities' social, economic and cultural well-being.</p>
Policy 14A.1.1.8 Private Residential Amenity.	Rule 14B.3.17.6 Size of Independent Dwelling Units Duplex Dwellings in Suburban Residential Zone.	Given that Plan Change 26 is proposing to remove minimum densities for comprehensively designed development, it is proposed to require a minimum dwelling size to ensure dwellings are functional and of a sufficient size to provide for the day to day

Policy	Rule/Assessment Criteria to implement policies	Comment
		<p>needs of residents, based on the number of occupants the dwelling is designed to accommodate. This provision remains important in ensuring that quality on site amenity is not compromised through enabling higher densities. The size proposed for the independent dwelling units is consistent with other Council's around New Zealand.</p> <p>The provision provides for communities' social, economic and cultural well-being.</p>
<p>Policy 14B.1.1.1 Bulk and Scale of Buildings in the Suburban Residential Zone and Large Lot Residential Zone.</p> <p>Policy 14B.1.2.1 Site and Building Design - Suburban Residential Zone and Large Lot Residential Zone.</p> <p>Policy 14A.1.1.8 Private Residential Amenity.</p>	<p>Rule 14B.3.17.7 Visual Outlook and Admission of Natural Light– Duplex Dwellings in Suburban Residential Zone.</p>	<p>It is proposed to include a provision requiring separation between windows, to ensure a reasonable standard of visual privacy between habitable rooms of different buildings is achieved on the site and from residential dwellings on adjacent sites. This also manages visual dominance effects within a site by ensuring that habitable rooms have an outlook and sense of space and contributes to achieving high quality on-site amenity for future residents. The proposed rule requires the outlook space to be located within the site, however it provides on exemptions where there is adjoining public spaces or areas where there are opportunities for passive surveillance to improve the safety of the public realm.</p> <p>This provision provides for communities' social, and cultural well-being and gives effect to Section 7(c) of the RMA - the maintenance and enhancement of amenity values.</p>
<p>Policy 14B.1.2.1 Site and Building Design - Suburban Residential Zone and Large Lot Residential Zone.</p> <p>Policy 14A.1.1.6 Public Realm Interface.</p> <p>Policy 14A.1.1.8 Private Residential Amenity.</p>	<p>Rule 14B.3.17.8 Waste Management Area – Duplex Dwellings in Suburban Residential Zone.</p>	<p>As we enable smaller sites and higher densities, we need to ensure that the space is useable and appropriate spaced is provided and screened from the public realm and adjacent sites.</p> <p>It is proposed to include a rule that requires a dedicated space be provided for the purpose of providing sufficient space for the storage of rubbish, recycling and food scrap bins. The size of the area proposed is sufficient to store a food scrap caddy, two wheelie bins and a crate for glass recycling that is proposed as part of the kerbside collection unique to Tauranga City.</p> <p>It is acknowledged that the New Zealand Building Code also has standards relating to Solid Waste. The proposed provision do not replicate standards or address matters that are already addressed through the Building Code.</p>

Policy	Rule/Assessment Criteria to implement policies	Comment
<p>Policy 14B.1.1.1 Bulk and Scale of Buildings in the Suburban Residential Zone and Large Lot Residential Zone.</p> <p>Policy 14B.1.2.1 Site and Building Design - Suburban Residential Zone and Large Lot Residential Zone.</p> <p>Policy 14A.1.1.6 Public Realm Interface.</p>	<p>Rule 14B.3.17.9 Interface with Street Duplex Dwellings in Suburban Residential Zone.</p> <p>Rule 14B.3.17.10 Fences and Walls – Duplex Dwellings in Suburban Residential Zone.</p>	<p>Rule 14B.3.17.9 proposes to include a rule with criteria that contributes to a high-quality public realm that is safe and attractive. The rule requires a minimum area of glazing to enable opportunities for passive surveillance and provide variation in the facade. It is acknowledged that in some cases, due to the orientation of the site and building, it may not be practicable to have a front door that faces the street or have a separate pedestrian access. The wording of the proposed rule provides for flexibility and the ability to meet the rule requirements through the building design and landscape elements.</p> <p>Rule 14B.3.17.10 proposed to set a maximum cumulative height for fences, walls and retaining structures in the front yard boundary to enable opportunities for passive surveillance and safety of the street and/or adjoining public place whilst providing privacy for dwellings. This rule refers to cumulative height to manage instances where more than one structures may be proposed, i.e. a fence on top of a retaining wall to ensure that passive surveillance is still being achieved.</p> <p>This will also minimise visual dominance effects to immediate neighbours and the street or adjoining public place.</p>
<p>Policy 14B.1.2.1 Site and Building Design - Suburban Residential Zone and Large Lot Residential Zone.</p>	<p>Rule 14B.3.17.11 Subdivision - Duplex Dwellings in Suburban Residential Zone.</p>	<p>It is proposed to include a rule that ensures that the site layout and services can comply with all of the provisions in the City Plan, including Section 12 Subdivision Services & Infrastructure so that if it is subdivided in future then the duplex dwelling can still comply with all of the permitted activity rules, including outdoor living area and visual outlook on each site.</p> <p>This provision ensures that residential amenity is maintained post subdivision and provides for communities' social, and cultural well-being and gives effect to Section 7(c) of the RMA - the maintenance and enhancement of amenity values.</p>

13.6. Comprehensively Designed Development - Suburban Residential Zone

Policy	Rule/Assessment Criteria to implement policies	Comment
<p>Policy 14A.1.2.1 Residential Diversity and Densities.</p> <p>Policy 14A.1.1.2 Urban Form and Consolidation.</p> <p>Policy 14A.1.1.4 Urban Form and Intensification.</p> <p>Policy 14B.1.3.1 Density of Development – Suburban Residential Zone and Large Lot Residential Zones.</p>	<p>Update Activity Status in Table 14B.1 to make CDD Restricted Discretionary Activity.</p> <p>Non-Notification of Resource Consents - Comprehensively designed development (Suburban Residential Zone - outside growth areas).</p> <p>14B.6(o) Restricted Discretionary Activity Rules.</p> <p>14B.7(q) Discretionary Activity Rules.</p>	<p>It is proposed to change the activity status for comprehensively designed development from Discretionary to Restricted Discretionary and to make it non-notified providing that all the development standards can be met to create a clear consenting pathway and provide more certainty for developers.</p> <p>To give effect to the natural hazard objective within the RPS, specific areas will be excluded from the proposed plan change provisions. Particularly areas subject to three hazards (erosion, inundation and liquefaction/lateral spread) will be excluded from the proposed plan change. By doing so, a precautionary approach via an avoidance risk management measure is implemented. Flooding will be addressed through a rule framework in PPC27.</p> <p>It is proposed to apply a stepped approach, where a development does not comply with up two standards it remains a restricted discretionary activity and for three or more non-compliances, the proposal becomes a discretionary activity. This approach assumes that for up to two non-compliances, the effects of each non-compliance can be effectively assessed through the discrete assessment criteria, whereas more than three non-compliances will require the additional assessment of cumulative effects. This approach provides for innovation and flexibility whilst retaining some certainty for both developers and Council's.</p> <p>The alternative approach is to rely on existing development standards and consent/notification triggers and require proposals for more intensive development to be considered against existing provisions. That would not provide clear guidance for applicants and decision-makers or enable housing choice.</p> <p>It is proposed to include a non-notification clause that provides for <i>comprehensively designed development</i> to be considered without public or limited notification or the need to obtain written approval providing that it meets all of the development standards. The rule also identifies three standards where it is considered that the effects associated with the non-compliance are internal amenity and therefore will retain its non-notification status.</p> <p>This approach creates an easier consenting pathway and provides more certainty for developers.</p>

Policy	Rule/Assessment Criteria to implement policies	Comment
		<p>The provisions respond to Council's obligation in the RMA (Section 31 (1)(aa)) for "<i>the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district</i>".</p>
	<p>Remove minimum density requirements for comprehensively designed development.</p>	<p>It is proposed to remove maximum development density requirements for comprehensively designed development in the Suburban Residential Zone to promote the efficient use of urban land and enable different building types and greater densities in this zone.</p> <p>Higher density residential development has the potential to have adverse effects on the existing urban environment, infrastructure and amenity. The provisions proposed through the plan change address the potential for adverse effects, within the context of the environment to which they apply. The effects are considered able to be appropriately managed through the proposed provisions.</p> <p>The overall density will largely be determined by compliance with the development standards including building envelope and site coverage. In addition, the proposed new policies and matters of discretion that link back to the Residential Outcomes Framework (non-statutory urban design guide), will ensure that a high level of on-site amenity is achieved and that the development respects the privacy on adjacent sites and is compatible with the character and surrounding area.</p> <p>Architectural testing indicates that on a site size of 720m², 5 attached terrace houses could be constructed that meet all of the proposed development standards. This section size was selected due to how common it is across the Suburban Residential Zone.</p>

Policy	Rule/Assessment Criteria to implement policies	Comment
<p>Policy 14B.1.1.1 Bulk and Scale of Buildings in the Suburban Residential Zone and Large Lot Residential Zone.</p> <p>Policy 14B.1.2.1 Site and Building Design - Suburban Residential Zone and Large Lot Residential Zone.</p> <p>Policy 14B.1.3.1 Density of Development - Suburban Residential Zone and Large Lot Residential Zone.</p>	<p>Rule 14B.3.2 Building Height - Suburban Residential Zone; Large Lot Residential.</p> <p>Rule 14B.3.3 Streetscape - Suburban Residential Zone; Large Lot Residential.</p> <p>Rule 14B.3.4 Setback - Suburban Residential Zone; Large Lot Residential.</p> <p>Rule 14B.3.7 Site Coverage – Suburban Residential Zone.</p>	<p>These rules work as a package to define the building envelope, controlling the scale of buildings to reduce the potential visual dominance and overshadowing effects of a CDD dwelling. It is proposed to retain the bulk and scale of what is currently permitted for <i>independent dwelling units</i> in the Suburban Residential Zone.</p> <p>The benefits of retaining these provisions are that residential amenity is maintained and the built form is consistent with existing community expectations. The provisions continue to provide for communities' social, economic and cultural well-being.</p> <p>More 'enabling' building envelope and development standards were considered, however this would result in potentially weaker protection of existing residential amenity.</p>
<p>Policy 4B.1.2.2 – Maintaining Road Function.</p>	<p>Rule 14B.3.9 – Access - Suburban Residential Zone; Large Lot Residential.</p>	<p>It is proposed to retain the number of independent dwelling units, homestays or shared accommodation that can be served by private rights of ways, private accessway or legal access.</p> <p>For the purposes of enabling duplex dwellings in the Suburban Residential Zone – this rule is still considered to be appropriate and will remain consistent with other development in the Suburban Residential Zone. Acknowledging that this will be reviewed through the City Plan review where a zone-wide approach will be considered.</p>
<p>Policy 14B.1.2.1 Site and Building Design - Suburban Residential Zone and Large Lot Residential Zone.</p> <p>Policy 14A.1.1.6 Public Realm Interface.</p>	<p>Rule 14B.6.24.3 Setbacks – Traffic Management – comprehensively designed development (Suburban Residential Zone - outside growth areas).</p>	<p>It is proposed to increase the setback of garages/carports with direct vehicle access to a road from 4.5m to 5m to ensure that the space is sufficient for a car to park in front of a garage without hanging over the footpath.</p>
<p>Policy 14B.1.1.1 Bulk and Scale of Buildings in the Suburban Residential Zone and Large Lot Residential Zone.</p> <p>Policy 14B.1.2.1 Site and Building Design - Suburban Residential Zone and Large Lot Residential Zone.</p>	<p>Rule 14B.6.24.4 Overshadowing – comprehensively designed development (Suburban Residential Zone - outside growth areas).</p>	<p>It is proposed to retain the building envelope as currently provided for in the Suburban Residential Zone but making an allowance for where the encroachment adjoins a boundary that forms part of a pedestrian/vehicle access lot, the control applies to the opposite side of the access lot. It acknowledges that these lots are used for access only and are not areas of high amenity. The amendment provides for flexibility and the efficient use of urban land.</p>

Policy	Rule/Assessment Criteria to implement policies	Comment
<p>Policy 14B.1.3.1 Density of Development - Suburban Residential Zone and Large Lot Residential Zone.</p> <p>Policy 14A.1.1.9 Residential Interface.</p>		<p>The efficiency of the proposed amendment is high because the benefits outweigh the costs.</p>
<p>Policy 14B.1.2.1 Site and Building Design - Suburban Residential Zone and Large Lot Residential Zone.</p> <p>Policy 14A.1.1.8 Private Residential Amenity.</p>	<p>Rule 14B.6.24.5 Outdoor Living Area – comprehensively designed development (Suburban Residential Zone - outside growth areas).</p>	<p>It is proposed to reduce the size of the minimum outdoor living areas but require it to be directly accessible by an indoor living area and that a dedicated space (capable of containing a 4 metre diameter) is located entirely in the North, North East or North West aspect of the site to provide access to sunlight and make it a more useable space. This is to ensure that while the space is smaller, it is useable.</p> <p>This contributes to achieving high quality on-site amenity for future residents and provides for communities' social, economic and cultural well-being.</p>
<p>Policy 14A.1.1.8 Private Residential Amenity.</p>	<p>Rule 14B.6.24.6 Size of Independent Dwelling Units – comprehensively designed development (Suburban Residential Zone - outside growth areas).</p>	<p>It is proposed to require a minimum dwelling size to ensure dwellings are functional and of a sufficient size to provide for the day to day needs of residents, based on the number of occupants the dwelling is designed to accommodate.</p> <p>This provision becomes important with higher densities to ensure dwellings are functional and of a sufficient size to provide for the day to day needs of residents, based on the number of occupants the dwelling is designed to accommodate.</p> <p>The provision provides for communities' social, economic and cultural well-being and gives effect to Section 7(c) of the RMA - the maintenance and enhancement of amenity values.</p>
<p>Policy 14B.1.1.1 Bulk and Scale of Buildings in the Suburban Residential Zone and Large Lot Residential Zone.</p> <p>Policy 14B.1.2.1 Site and Building Design - Suburban Residential Zone and Large Lot Residential Zone.</p> <p>Policy 14A.1.1.8 Private Residential Amenity.</p>	<p>Rule 14B.6.24.7 Visual Outlook and Admission of Natural Light– comprehensively designed development (Suburban Residential Zone - outside growth areas).</p>	<p>It is proposed to include a provision requiring separation between windows, to ensure a reasonable standard of visual privacy between habitable rooms of different buildings is achieved on the site. This also manages visual dominance effects within a site by ensuring that habitable rooms have an outlook and sense of space and contributes to achieving high quality on-site amenity for future residents.</p> <p>This provision provides for communities' social, and cultural well-being and gives effect to Section 7(c) of the RMA - the maintenance and enhancement of amenity values.</p>

Policy	Rule/Assessment Criteria to implement policies	Comment
Policy 14B.1.2.1 Site and Building Design - Suburban Residential Zone and Large Lot Residential Zone. Policy 14A.1.1.6 Public Realm Interface. Policy 14A.1.1.8 Private Residential Amenity.	Rule 14B.6.24.8 Waste Management Area – comprehensively designed development (Suburban Residential Zone - outside growth areas). Matter of Discretion i) Waste Management.	<p>As we enable smaller sites and higher densities, we need to ensure that the space is useable and appropriate spaced is provided and screened from the public realm and adjacent sites.</p> <p>It is proposed to include a rule that requires a dedicated space to be provided for the purpose of providing sufficient space for the storage of rubbish, recycling and food scrap bins that is applicable specifically to Tauranga City and that it is screened from public spaces and adjoining residential sites.</p> <p>The matter of discretion ensures that the space that is provided is appropriately located, accessible, and integrated into the design of the building.</p> <p>It is acknowledged that the Building Code also has standards relating to Solid Waste. The proposed provision does not replicate standards or issues already addressed through the Building Code.</p>
Policy 14A.1.1.6 Public Realm Interface.	Rule 14B.6.24.9 Fences and Walls – comprehensively designed development (Suburban Residential Zone - outside growth areas).	It is proposed to set a maximum fence height in the front yard boundary to provide privacy for dwellings while enabling opportunities for passive surveillance and safety of the street and/or adjoining public place. This will also minimise visual dominance effects to immediate neighbours and the street or adjoining public place. This rule refers to cumulative height to manage instances where more than one structures may be proposed, i.e. a fence on top of a retaining wall to ensure that passive surveillance is still being achieved.
Policy 14A.1.1.5 Site and Context .	Matter of Discretion a). Site and Context.	<p>The proposed new policies specify a course of action to achieve high quality on and off-site amenity. The policies and matters of discretion link back to the outcomes identified in the Residential Outcomes Framework and encourage development that achieves high quality on-site amenity and buildings that that relate well to their immediate and wider surroundings.</p> <p>The Residential Outcomes Framework remains a non-statutory document but provides the applicant with guidance and corresponding images on how the outcomes can be achieved. However, the wording allows for applicants to demonstrate alternative ways on how the outcomes can still be achieved. This approach provides for innovation and flexibility.</p>
Policy 14A.1.1.6 Public Realm Interface .	Matter of Discretion b) Public Realm Interface.	
Policy 14A.1.1.7 Movement Networks .	Matter of Discretion c) Movement Networks.	
Policy 14A.1.1.8 Private Residential Amenity.	Matter of Discretion d) Private Residential Amenity.	
Policy 14A.1.1.9 Residential Interface.	Matter of Discretion e) Privacy and solar access.	
Policy 14A.1.1.10 Safety and Security.	Matter of Discretion f) Safety and Security.	
Policy 14A.1.1.11 Choice, Resilience and Flexibility.		

Policy	Rule/Assessment Criteria to implement policies	Comment
		<p>The benefits of these provisions are that high-quality residential amenity is protected both on-site and off-site.</p> <p>This provision provides for communities' social, and cultural well-being and gives effect to Section 7(c) of the RMA - the maintenance and enhancement of amenity values.</p>
<p>Policy 14A.1.1.11 Choice, Resilience and Flexibility.</p> <p>Policy 14A.1.1.12 Sustainability.</p>	Matter of Discretion k) Positive Effects.	Policies 14A.1.1.11 and 14A.1.1.12 link to outcomes identified in the Residential Outcomes Framework, however it is acknowledged that it is not always practicable or feasible to provide the outcomes sought in these policies, and therefore these are linked to a broader matter of discretion that covers positive effects and encourages the developer to take these into consideration.
<p>Policy 14A.1.1.5 Site and Context.</p> <p>Policy 14A.1.1.6 Public Realm Interface.</p> <p>Policy 14A.1.1.8 Private Residential Amenity.</p> <p>Policy 14A.1.1.9 Residential Interface.</p> <p>Policy 14A.1.1.12 Sustainability.</p>	Matter of Discretion g). Landscaping.	<p>The proposed matter of discretion encourages development to incorporate soft and hard landscape elements to contribute to achieving high quality on and off-site amenity. Direction is provided by Policies 14A.1.1.5, 14A.1.1.6, 14A.1.1.8, 14A.1.1.9 and the Residential Outcomes Framework on how landscaping can be used to provide for quality living environments and achieve attractive and safe streets and public open spaces.</p> <p>This provision provides for communities' social, and cultural well-being and gives effect to Section 7(c) of the RMA - the maintenance and enhancement of amenity values.</p>
<p>Policy 14A.1.1.8 Private Residential Amenity.</p>	Matter of Discretion h) Service Area.	<p>Consideration was given to whether a new rule should be introduced to set a minimum volume of storage that each independent dwelling unit should provide. However, a matter of discretion was considered to be more appropriate to ensure that secure and conveniently accessible storage is provided for the number and type of occupants the dwelling is designed to accommodate.</p> <p>This approach provides for innovation and flexibility. It acknowledges that the total area required will be dependent on other factors, such as total internal floor area and number of bedrooms of the proposed <i>independent dwelling units</i> and whether a lockable garage is proposed.</p> <p>This provision provides for communities' social, and cultural well-being and gives effect to Section 7(c) of the RMA - the maintenance and enhancement of amenity values.</p>

Policy	Rule/Assessment Criteria to implement policies	Comment
<p>Policy 14A.1.2.1 Residential Diversity and Densities.</p> <p>Policy 14A.1.1.2 Urban Form and Consolidation.</p> <p>Policy 14A.1.1.4 Urban Form and Intensification.</p>	<p>Information Requirement b): Engineering Assessment</p> <p>Matter of Discretion j) Infrastructure.</p>	<p>These policies, information requirements and matter of discretion acknowledge that built development needs to be serviced by adequate network infrastructure. They require that the development is adequately serviced by network infrastructure to ensure acceptable environmental results. This matter of discretion is a result of the infrastructure modelling for water, wastewater and transport.</p> <p>The provisions provide for communities' social, economic, environmental and cultural well-being.</p> <p>The provisions respond to Council's obligation (Section 31 (1) (aa)) for <i>"the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district"</i>.</p>
<p>Policy 14A.1.1.4 Urban Form and Intensification.</p> <p>Policy 14B.1.2.1 Site and Building Design - Suburban Residential Zone and Large Lot Residential Zone.</p> <p>Policy 14B.1.3.1 Density of Development - Suburban Residential Zone and Large Lot Residential Zone.</p>	<p>Information Requirement c): subdivision.</p>	<p>This requires all applications for comprehensively designed development to show how the development can comply with the provisions of the City Plan as if the site were undergoing a subdivision.</p> <p>This approach is consistent with the definition for <i>comprehensively designed development (Suburban Residential Zone – outside of urban growth areas)</i> which requires all the design elements considered in the subdivision and land uses rules of the City Plan considered in a comprehensive manner. In the instance that the landuse consent application is lodged and processed prior to the subdivision application, it will provide certainty to Council that if the site is to be subdivided in future, then the services and site layout, (particularly outdoor living area), will still be appropriate for each independent dwelling unit.</p> <p>This provision provides for communities' social, and cultural well-being.</p>

13.7. Comprehensively Designed Development – Te Papa Housing Overlay and City Living Zone

Policy	Rule/Assessment Criteria to implement policies	Comment
<p>Policy 14B.1.1.2 Bulk and Scale of Buildings in the Te Papa Housing Overlay.</p> <p>Policy 14B.1.2.2 Site and Building Design in the Te Papa Housing Overlay.</p> <p>Policy 14B.1.32.2 Density of Development in the Te Papa Housing Overlay.</p> <p>Policy 14D.1.1.1. Bulk and Scale of Buildings and Structures in the City Living Zone.</p> <p>Policy 14D.1.2.1 Site Layout and Building Design in the City Living Zone - Comprehensively Designed Development.</p> <p>Policy 14D.1.3.1 Density of Development in the City Living Zone.</p>	<p>14B.6.27 Restricted Discretionary Activities – Standards and Terms – Comprehensively designed development (Te Papa Housing Overlay).</p> <p>14D.4.2.1 comprehensively designed development.</p>	<p>As discussed earlier, the new policies that relate to the Te Papa Housing Overlay cross reference to the corresponding policy in <i>Chapter 14D City Living Zone</i> and acknowledge that the anticipated outcome in these two areas are the same. The same approach has been applied to the provisions, where Rule 14B.6.27 cross references the relevant rules in the City Living Zone.</p> <p>To give effect to the natural hazard objective within the RPS, exclusions are proposed of where the proposed plan change will apply. Particularly areas subject to three hazards (erosion, inundation and liquefaction/lateral spread) will be excluded from the proposed plan change. By doing so, a precautionary approach via an avoidance risk management measure is implemented. Flooding will be addressed through a rule framework in PPC27.</p> <p>This approach improves the clarity and usability of the of the City Plan and avoids unnecessary duplication.</p> <p>The approach will require a review to meet the National Planning Standards as part of the City Plan Review.</p>
<p>Policy 14A.1.2.1 Residential Diversity and Densities.</p> <p>Policy 14A.1.1.2 Urban Form and Consolidation.</p> <p>Policy 14A.1.1.4 Urban Form and Intensification.</p> <p>Policy 14B.1.3.2 Density of Development in the Te Papa Housing Overlay.</p> <p>Policy 14D.1.3.1 Density of Development in the City Living Zone.</p>	<p>Delete 14D.4.2.2. Development Density.</p> <p>14D.4.1 Non-Notification of Resource Consents - Comprehensively designed development Te Papa Housing Overlay and City Living Zone.</p> <p>14B.6(p) Restricted Discretionary Activity Rules.</p> <p>14B.7(r) Discretionary Activity Rules.</p> <p>14D.4(b) Restricted Discretionary Activity Rules.</p> <p>14D.5(g) Discretionary Activity Rules.</p>	<p>It is proposed to remove maximum development density requirements for comprehensively designed development in the City Living Zone and remove minimum site area requirements. to promote the efficient use of urban land and enable different building types and greater densities in this zone.</p> <p>This approach recognises that large areas of the Te Papa peninsula and City Living Zone contain smaller sites where it may not be feasible to amalgamate and benefit from the site density bonus to construct higher density typologies.</p> <p>It is proposed to apply a stepped approach, where a development does not comply with up two standards it is retained as a Restricted Discretionary Activity and for three or more non-compliances, the proposal becomes a Discretionary Activity. This approach assumes that for up to two non-compliances, the effects of each non-compliance can be effectively assessed through the discrete assessment criteria, whereas more than three non-compliances will require the additional assessment of cumulative effects. This approach provides for innovation and flexibility whilst retaining some certainty for both developers and Council's.</p>

Policy	Rule/Assessment Criteria to implement policies	Comment
		<p>It is proposed to update the existing non-notification clause to identify standards where it is considered that the effects associated with the non-compliance are internal amenity and therefore will retain its non-notification status.</p> <p>The alternative approach is to rely on existing development standards and consent/notification triggers and require proposals for more intensive development to be considered against existing provisions. That would not provide clear guidance for applicants and decision-makers.</p> <p>The provisions respond to Council's obligation in the RMA (Section 31 (1)(aa)) for <i>"the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district"</i>.</p>
Policy 14A.1.1.8 Private Residential Amenity.	Rule 14D.4.2.2 Size of Independent Dwelling Units.	<p>It is proposed to amend this rule to refer to nett internal floor area rather than gross floor area to align with the definition provided in the National Planning Standards. It is also proposed to separate studio and one bedroom units and slightly reduce the floor areas requirements to better align with other Councils, in NZ.</p> <p>With higher densities it is important to retain this provision to ensure dwellings are functional and of a sufficient size to provide for the day to day needs of residents, based on the number of occupants the dwelling is designed to accommodate.</p> <p>This provision ensures that residential amenity is maintained post subdivision and provides for communities' social, and cultural well-being and gives effect to Section 7(c) of the RMA - the maintenance and enhancement of amenity values.</p>
Policy 14B.1.1.2 Bulk and Scale of Buildings in the Te Papa Housing Overlay. Policy 14D.1.1.1. Bulk and Scale of Buildings and Structures in the City Living Zone.	Rule 14D.4.2.3 Height.	<p>Proposed Appendix 14H provides maximum building heights for the Te Papa Housing Overlay and City Living Zones.</p> <p>The proposed heights in these areas have been established to give effect to the NPS-UD requirements and enable building heights of 6 storeys within a walkable catchment of planned rapid transit stops and the edge of city centre zones.</p> <p>Additional to this, suitability assessment was undertaken to identify areas that were suitable for higher densities and building height given their location to public transport, centres and amenities and considers the existing topography and site size. It is proposed to have a stepped approach, and provide for 6 storeys, surrounded</p>

Policy	Rule/Assessment Criteria to implement policies	Comment
		<p>by 4 storeys to provide a transition to the existing established Suburban Residential Zone with a height limit of 9m.</p> <p>Maximum heights proposed in the Te Papa Housing Overlay also considers local challenges of natural hazards and viewshafts. Further explanation of the extent of the Te Papa Housing Overlay and compliance with the NPS-UD requirements is provided in Appendix 7.</p>
<p>Policy 4B.1.2.2 – Maintaining Road Function.</p> <p>Policy 14A.1.1.6 Public Realm Interface.</p> <p>Policy 14A.1.1.8 Private Residential Amenity.</p> <p>Policy 14A.1.1.9 Residential Interface.</p> <p>Policy 14B.1.1.2 Bulk and Scale of Buildings in the Te Papa Housing Overlay.</p> <p>Policy 14B.1.2.2 Site and Building Design in the Te Papa Housing Overlay.</p> <p>Policy 14D.1.1.1. Bulk and Scale of Buildings and Structures in the City Living Zone.</p> <p>Policy 14D.1.2.1 Site Layout and Building Design in the City Living Zone - Comprehensively Designed Development.</p>	<p>Rule 14D.4.2.4 Streetscape.</p> <p>Rule 14D.4.2.5 Setbacks.</p> <p>Rule 14D.4.2.6 Overshadowing.</p> <p>Delete Rule 14D.4.2.8 Sunlight Admission to Independent dwelling Units.</p> <p>Rule 14D.4.2.7 Site Coverage.</p> <p>Rule 14D.4.2.8 On-Site Outdoor Living Areas.</p> <p>Rule 14D.4.2.9 Visual Outlook and Admission of Natural Light.</p> <p>Matter of Discretion b) Public Realm Interface.</p> <p>Matter of Discretion d) Private Residential Amenity.</p> <p>Matter of Discretion e) Privacy and solar access.</p> <p><i>Delete Appendix 14E City Living Zone Setbacks.</i></p> <p><i>Delete Appendix 14F City Living Zone Sunlight Admission to Independent Dwelling Units.</i></p> <p><i>Delete Appendix 14D City living Zone Building Heights.</i></p> <p><i>Amend Appendix 14G City Living Zone Visual Outlook.</i></p> <p><i>Insert new Appendix 14H Te Papa Housing Overlay maximum heights.</i></p> <p><i>Insert new Appendix 14I Overshadowing for City Living and Te Papa Housing Overlay.</i></p> <p><i>Insert new Appendix 14J Outdoor Private Living Area.</i></p>	<p>Policies 14D.1.1.1 and 14D.1.2.1 seeks that new buildings are consistent with the planned urban built form that achieves a higher density urban built character in a variety of forms. Amendments are proposed to the existing bulk and scale provisions for the City Living Zone to support higher density-built forms and also to enable 6 storey development to give effect to the NPS-UD. The more enabling provisions would provide opportunities for more houses and variety of housing types. Economic and employment opportunities would arise from construction activity.</p> <p>The rules work as a package to define the development standards of a site's building envelope, controlling the scale of buildings and the externalities of buildings. The appendices provide further clarification and guidance on how the rules should be interpreted using diagrams.</p> <p>Matters of Discretion b), d) and e) link to the Residential Outcomes Framework and design guidelines and specify a course of action to assist in achieving high quality built outcomes and ensure that higher density development achieve high quality on and off-site amenity.</p> <p>It is proposed to delete Rule 14D.4.2.8 as this rule is very prescriptive and it is considered that other policies, rules and matters of discretion, including policy 14A.1.1.8, Rule 14D.4.2.9, Rule 14D.4.2.8 and Matter of Discretion d), relating to on-site amenity will ensure that that each independent dwelling unit receives direct access to sunlight in both indoor and outdoor living areas.</p> <p>Rule 14D.4.2.7 removes the maximum amount of a site that can be covered by buildings. This will instead be determined through achieving other development standards (including setbacks, outdoor living areas and impervious surface proposed by Plan Change 27).</p>

Policy	Rule/Assessment Criteria to implement policies	Comment
		<p>Without the proposed changes to the City Plan the aspirations of the RPS and the requirements of the NPS-UD are unlikely to be met.</p> <p>These provisions provide for communities' social, and cultural well-being and gives effect to Section 7(c) of the RMA - the maintenance and enhancement of amenity values. The benefits of these provisions are that high-quality residential amenity is provided.</p>
<p>Policy 14B.1.1.2 Bulk and Scale of Buildings in the Te Papa Housing Overlay.</p> <p>Policy 14B.1.2.2 Site and Building Design in the Te Papa Housing Overlay.</p> <p>Policy 14D.1.1.1 Bulk and Scale of Buildings and Structure in the City Living Zone.</p> <p>Policy 14D.1.2.1 Site and Building Design in the City Living Zone – comprehensively designed development.</p> <p>Policy 14A.1.1.6 Public Realm Interface.</p> <p>Policy 14A.1.1.8 Private Residential Amenity.</p>	<p>Rule 14D.4.2.10 Waste Management Area.</p> <p>Matter of Discretion i) Waste Management.</p>	<p>As we enable smaller sites and higher densities, we need to ensure that the space is useable and appropriate spaced is provided and screened from the public realm and adjacent sites.</p> <p>It is proposed to include a rule that requires a dedicated area to be provided for the purpose of providing sufficient space for the storage of rubbish, recycling and food scrap bins that is applicable specifically to Tauranga City and that it is screened from public spaces and adjoining residential sites.</p> <p>The matter of discretion ensures that the space that is provided is appropriately located, accessible, and integrated into the design of the building.</p> <p>It is acknowledged that the Building Code also has standards relating to Solid Waste. The proposed provision does not replicate standards or issues already addressed through the Building Code.</p>
Policy 14A.1.1.5 Site and Context.	Matter of Discretion a) Site and Context.	<p>The proposed new policies specify a course of action to achieve high quality on and off-site amenity. The policies and matters of discretion link back to the outcomes identified in the Residential Outcomes Framework and encourage development that achieves high quality on-site amenity and buildings that relate well to their immediate and wider surroundings.</p> <p>The Residential Outcomes Framework remains a non-statutory document but provides the applicant with guidance and corresponding images on how the outcomes can be achieved. However, the wording allows for applicants to demonstrate alternative ways on how the outcomes can still be achieved. This approach provides for innovation and flexibility.</p> <p>The benefits of these provisions are that high-quality residential amenity is protected both on-site and off-site.</p>
Policy 14A.1.1.6 Public Realm Interface .	Matter of Discretion b) Public Realm Interface.	
Policy 14A.1.1.7 Movement Networks.	Matter of Discretion c) Movement Networks.	
Policy 14A.1.1.8 Private Residential Amenity.	Matter of Discretion d) Private Residential Amenity.	
Policy 14A.1.1.9 Residential Interface.	Matter of Discretion e) Privacy and solar access.	
Policy 14A.1.1.10 Safety and Security.	Matter of Discretion f) Safety and Security.	
Policy 14A.1.1.11 Choice, Resilience and Flexibility.		

Policy	Rule/Assessment Criteria to implement policies	Comment
		This provision provides for communities' social, and cultural well-being and gives effect to Section 7(c) of the RMA - the maintenance and enhancement of amenity values.
Policy 14A.1.1.5 Site and Context. Policy 14A.1.1.6 Public Realm Interface. Policy 14A.1.1.8 Private Residential Amenity. Policy 14A.1.1.9 Residential Interface. Policy 14A.1.1.12 Sustainability.	Matter of Discretion g). Landscaping.	<p>The proposed matter of discretion encourages development to incorporate soft and hard landscape elements to contribute to achieving high quality on and off-site amenity. Direction is provided by Policies 14A.1.1.5, 14A.1.1.6, 14A.1.1.8, 14A.1.1.9 and the Residential Outcomes Framework on how landscaping can be used to provide for quality living environments and achieve attractive and safe streets and public open spaces.</p> <p>This provision provides for communities' social, and cultural well-being and gives effect to Section 7(c) of the RMA - the maintenance and enhancement of amenity values.</p>
Policy 14A.1.1.8 Private Residential Amenity.	Matter of Discretion h) Storage area.	<p>Consideration was given to whether a new rule should be introduced to set a minimum volume of storage that each independent dwelling unit should provide. However, a matter of discretion was considered to be more appropriate to ensure that secure and conveniently accessible storage is provided for the number and type of occupants the dwelling is designed to accommodate.</p> <p>This approach provides for innovation and flexibility, it acknowledges that the total area required will be dependent on other factors, such as total internal floor area and number of bedrooms of the proposed <i>independent dwelling units</i> and whether a lockable garage is proposed.</p> <p>This provision provides for communities' social, and cultural well-being and gives effect to Section 7(c) of the RMA - the maintenance and enhancement of amenity values.</p>
Policy 14A.1.1.11 Choice, Resilience and Flexibility. Policy 14A.1.1.12 Sustainability.	Matter of Discretion I) Positive Effects.	Policies 14A.1.1.11 and 14A.1.1.12 link to outcomes identified in the Residential Outcomes Framework, however it is acknowledged that it is not always practicable or feasible to provide the outcomes sought in these policies, and therefore these are linked to a broader matter of discretion that covers positive effects and encourages the developer to take these into consideration.
Policy 14A.1.2.1 Residential Diversity and Densities.	Matter of Discretion j) Density.	The proposed new matter of discretion supports Policy 14A.1.1.2 which encourages increased housing choice and maximise land efficiency near centres and public transport to reflect the direction of the NPS-UD.

Policy	Rule/Assessment Criteria to implement policies	Comment
<p>Policy 14B.1.3.2 Density of Development in the Te Papa Housing Overlay.</p> <p>Policy 14D.1.3.1 Density of Development in the City Living Zone.</p>		
<p>Policy 14A.1.2.1 Residential Diversity and Densities.</p> <p>Policy 14A.1.1.2 Urban Form and Consolidation.</p> <p>Policy 14A.1.1.4 Urban Form and Intensification.</p> <p>Policy 14B.1.3.2 Density of Development in the Te Papa Housing Overlay.</p> <p>Policy 14D.1.3.1 Density of Development in the City Living Zone.</p>	<p>Information Requirements: Engineering Assessment.</p> <p>Matter of Discretion k) Infrastructure.</p>	<p>These policies, information requirements and matter of discretion acknowledge that built development needs to be serviced by adequate network infrastructure. They require that the development is adequately serviced by network infrastructure to ensure acceptable environmental results. This matter of discretion is a result of the infrastructure modelling for water, wastewater and transport.</p> <p>The provisions provide for communities' social, economic, environmental and cultural well-being.</p> <p>The provisions respond to Council's obligation (Section 31 (1) (aa)) for <i>"the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district"</i>.</p>
<p>Policy 14A.1.1.4 Urban Form and Intensification.</p> <p>Policy 14B.1.2.2 Site and Building Design in the Te Papa Housing Overlay.</p> <p>Policy 14B.1.3.2 Density of Development in the Te Papa Housing Overlay.</p> <p>Policy 14D.1.2.1 Site Layout and Building Design in the City Living Zone - Comprehensively Designed Development.</p> <p>Policy 14D.1.3.1 Density of Development in the City Living Zone.</p>	<p>Information Requirement c): subdivision.</p>	<p>This requires all applications to show how the development can comply with the provisions of the City Plan as if the site were undergoing a subdivision.</p> <p>This approach is consistent with the definition for <i>comprehensively designed development</i> which requires all the design elements required to be considered in the subdivision and land uses rules of the City Plan considered in a comprehensive manner. In the instance that the landuse consent application is lodged and processed prior to the subdivision application, it will provide certainty to Council that if the site is to be subdivided in future then the services and site layout, (particularly outdoor living area), will still be adequate for each independent dwelling unit.</p> <p>This provision provides for communities' social, and cultural well-being.</p>

13.8. Residential activities in Commercial Zone

Policy	Rule/Assessment Criteria to implement policies	Comment
<p>Policy 17A.7.3.1 Activities Within the Commercial, Wairakei Town Centre and Wairakei Neighbourhood Centre Zones.</p> <p>Policy 17A.7.4.1 Movement Networks.</p> <p>Policy 17A.7.4.2 Private Residential Amenity.</p> <p>Policy 17A.7.4.3 Safety and Security.</p>	<p>Update Activity Status in Table 17A.1 to make residential activities Restricted Discretionary Activity.</p> <p>Matter of Discretion a) Movement Networks.</p> <p>Matter of Discretion b) Private Residential Amenity.</p> <p>Matter of Discretion c) Safety and Security of internal spaces.</p> <p>Rule 17A.14.18.4 Outdoor Living Area – Residential activities in Commercial Zone.</p> <p>Rule 17A.14.18.5 Size of Independent Dwelling Units – Residential activities in Commercial Zone.</p> <p>Rule 17A.14.18.6 Visual Outlook and Admission of Natural Light – Residential activities in Commercial Zone.</p> <p>Non-Notification of Resource Consents – Residential activities in Commercial Zone.</p>	<p>Policy 17A.7.3.1 seeks that residential development provides quality on site residential amenity for future residents and sets a desired end state of mixed use areas of business, civic, community uses integrated with residential.</p> <p>Policies 17A.7.3.1, 17A.7.4.1, 17A.7.4.2 and 17A.7.4.3 are supported by new provisions and matters of discretion which specify a course of action to achieve quality on site residential amenity. The policies and matters of discretion link back to the outcomes identified in the Residential Outcomes Framework.</p> <p>Mixed use areas have potential for incompatible land uses. The benefits of these provisions are that high-quality residential amenity is provided on-site, as off-site amenity may not necessarily be provided given the Commercial zoning of the area. These provisions provide for communities' social, and cultural well-being and gives effect to Section 7(c) of the RMA - the maintenance and enhancement of amenity values.</p> <p>Making the resource consent pathway non-notified continues to provide a clear consenting pathway and certainty for developers.</p> <p>An alternative approach is to focus the zone on commercial rather than mixed uses. However, the aspirations of the TUS, FDS and the requirements of the NPS UD are unlikely to be achieved with this approach.</p>
<p>Policy 17A.7.1.1 Bulk and Scale of Buildings in the Commercial, Wairakei Town Centre and Wairakei Neighbourhood Centre Zones</p>	<p>Rule 17A.11.2 - Pedestrian Environment Streets.</p> <p>Rule 17A.11.3 – Streetscape.</p> <p>Rule 17A.11.4 - Boundaries of Commercial Zone and Sensitive Zone.</p>	<p>These rules work as a package to define the building envelope, controlling the scale of buildings to what is considered appropriate in the Commercial Zone.</p> <p>It is proposed to retain the bulk and scale of what is currently permitted for residential activities in the Commercial Zone. This ensures that the built form is consistent with community and developers expectations and continue to provide for communities' economic well-being.</p>
<p>Policy 17A.7.1.1 Bulk and Scale of Buildings in the Commercial, Wairakei Town Centre and Wairakei Neighbourhood Centre Zones.</p>	<p>Rule 17A.11.1 Building Height in the Commercial Zone, Tauriko Commercial Zone and Excelsa Commercial Plan Area.</p>	<p>It is proposed to increase the building height of existing commercial zoned areas in the Te Papa peninsula to be consistent with the height of the surrounding residential area and avoid low height pockets of commercial land surrounded by taller residential buildings.</p>

Policy	Rule/Assessment Criteria to implement policies	Comment
Policy 17A.7.3.1 Activities Within the Commercial, Wairakei Town Centre and Wairakei Neighbourhood Centre Zones.	Rule 17A.11.5 Residential and Visitor Accommodation Density.	<p>It is proposed to remove minimum densities and enable greater density in the Commercial Zone for residential activities, as these are areas that are highly accessible to shops and amenities.</p> <p>It also promotes the efficient use of urban land and enable different building types and greater densities in this zone.</p> <p>The provisions respond to Council's obligation in the RMA (Section 31 (1)(aa)) for <i>"the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district"</i>.</p>
Policy 17A.7.3.1 Activities Within the Commercial, Wairakei Town Centre and Wairakei Neighbourhood Centre Zones. Policy 17A.7.4.1 Movement Networks. Policy 17A.7.4.2 Private Residential Amenity. Policy 17A.7.4.3 Safety and Security.	17A.14.18.3 Residential activities in Commercial Zone.	<p>Residential development should not compromise the purpose of the zone, which is to provide for commercial activities.</p> <p>Policy 17A.7.3.1 discourages residential activities at ground level in order to promote a well-functioning Commercial centre. The provisions promote well-functioning Commercial centres including residential activities in close proximity, to provide a customer base for economic and employment opportunities from the development and operation of commercial activities. By requiring residential activity to be located above ground floor level retains a continuous business, civic and community activity frontage at ground floor level.</p> <p>It also separates the pedestrian access from service areas associated with Commercial Zone at ground floor and contributes to achieving quality on site residential amenity.</p> <p>These provisions provide for communities' social, and cultural well-being and gives effect to Section 7(c) of the RMA - the maintenance and enhancement of amenity values.</p>

14. Conclusion

The Council proposes a change to the City Plan to enable a variety of housing choice across Tauranga City.

Tauranga has experienced strong population growth in recent years, and this is projected to continue for several decades. The existing rule frameworks within the City Plan for the Suburban Residential, Commercial and City Living zones are inconsistent with emerging land use strategies and are not achieving desired built form outcomes for existing urban and suburban areas, nor sufficiently providing for the city's ongoing high rate of population growth.

The proposed Plan Change seeks to:

- (a) Partially address residential development capacity constraints and contribute towards achieving the targets for housing development capacity as set out in the City Plan and the RPS;
- (b) Enable a variety of housing choice across the city;
- (c) Reduce pressure on urban expansion and associated infrastructure investment requirements by enabling more intensification of existing urban areas;
- (d) Creating quality built form outcomes;
- (e) Deliver on a more compact city as outlined in the FDS, TUS and UFTI; and
- (f) Give effect to higher order documents; in particular the NPS-UD and the RPS.

The evaluation of the effectiveness and efficiency of the options has concluded that intensification of the Suburban Residential Zone, City living Zone and within the Te Papa Housing Overlay provides the greatest opportunity in terms of residential development capacity, making it more likely that residential intensification will make a significant contribution towards achieving the target as set out in Section 2A.3 of the City Plan for housing development capacity medium to long term. This option also aligns with higher order documents, particularly the direction in the TUS and FDS and gives effect to the NPS-UD.

The evaluation of the effectiveness and efficiency of the options has also concluded that amendments to the residential provisions within the Commercial Zone are necessary to provide greater direction on design and amenity outcomes within the provisions and activity status to ensure high quality on-site amenity is achieved for future residents.

The proposed plan change has been evaluated under the requirements of Section 32 of the RMA and is the best available means to achieve the objectives and the sustainable management purpose of the RMA.

15. Appendices

1. Assessment for Natural hazards provisions (A11648790);
 - (a) Tauranga City-wide Natural Hazards Risk Assessment (Tonkin & Taylor 2020); (A11649603)
 - (b) Tauranga City-wide Natural Hazards Risk Assessment (Supplementary Assessment: Liquefaction Hazard and Lateral Spread for different Natural Hazard Zones) (Tonkin & Taylor 2020) (A11649609);
 - (c) Plan Change 26 Residential Intensification & Natural Hazard Risk Management (Boffa Miskell 2020) (A11675483);
 - (d) High Level Risk Assessment for lifelines Utilities under Land Instability Hazard. (WSP 2020) (A11676129);
 - (e) RPS Policy Implementation - Summary Table (A11621955);
 - (f) Correspondence with the Bay of Plenty Regional Council (A11674462);
 - (g) Plan Change 26 – Map of where Plan Change 26 Applies (based upon Councils GIS mapping) (A11649607).
2. Assessment against higher order documents;
 - (a) Assessment against NPS-UD (A10776774);
 - (b) Assessment against NZCPS (A11624813);
 - (c) Assessment against BOPRPS (A11557599).
3. Assessment against Iwi Management Plans (A11626720);
4. S.35 monitoring report (Beca Ltd 2019) (A11697856);
5. Development Capacity Report, August 2020, Market Economics (A11673609);
6. Residential Intensification Concept Designs and proposed Plan Change Testing (Veros and Designgroup Stapleton Elliot 2020) (A11411440);
7. Extent and location of the Te Papa Housing Overlay (A11640790);
8. Planning mechanisms to enable intensification in Te Papa (A11585636);
9. Infrastructure;
 - (a) Transport (A11782450);
 - (b) Water supply and Wastewater (A11597697);
10. Engagement;
 - (a) Record of engagement – Iwi and hapū (A10981183);
 - (b) Plan Change 26 Report – tangata whenua responses to PPC26;
 - (c) Plan Change 26 Report – Community and Key stakeholder engagement 2020 (A11615391).

11. Council resolutions (A10700651);
12. Secondary Independent Dwelling Units (A11677877);
13. Section 32 Evaluation approach: objectives assessment and options analysis (A10879184);
14. Architectural testing (Designgroup Stapleton Elliot 2020);
15. Residential Outcomes Framework (Beca Ltd 2020) (A11354536);

16. Resources

1. SmartGrowth: Housing and Business Development Capacity Assessment 2017;
2. SmartGrowth: Housing and Business Development Capacity Draft Assessment 2018;
3. SmartGrowth: Development Trends Technical Report 2018;
4. Smartgrowth: Housing Demand and Need in Tauranga and Western Bay of Plenty, Community Housing Solutions Ltd, November 2017;
5. Tauranga City Council: Tauranga Medium Density Housing – Residential Outcomes Framework, Beca Limited, June 2019;
6. Tauranga City Council: Tauranga City Plan – Section 35 reporting / gap analysis, Beca Limited, 20 August 2019;
7. Tauranga City Council: Tauranga City Population and Household Projection Review 2018 (Growth Allocations 2013-2063), 15 October 2018;
8. Tauranga City Council: Western Bay Sub-Region Residential Development Capacity Review, Veros Property Services, May 2019;
9. National Policy Statement on Urban Development Capacity: Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas. Wellington: Ministry for the Environment, 2018;
10. Beca: Enabling Growth – Urban Zones Research: Key Observations, Findings and Recommendations, 10 August 2018;
11. Tools for increasing social and affordable housing in the Western Bay of Plenty, Research for the Urban Form and Transport Initiative, March 2020.