



## DRAFT FEEDBACK

**On:** The Urban Form and Transport Initiative (UFTI) Interim Report

**By:** SmartGrowth Strategic Partners Forum

**Date:** 24 March 2020

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### 1. Introduction

Thank you for the opportunity to make a submission on the Interim Report. The Strategic Partners Forum (SPF) presents the following submission in accordance with its role to act as a knowledge pool to the SLG and to assist guiding decisions relating to (strategy) implementation as per its terms of reference

### 2. Submission points

- i. We believe UFTI needs to be placed within a wider spatial plan framework, **and that it is a key input into the development of a joint spatial plan** to enable its delivery on spatial planning obligations as well as its brief. Using this approach, it will then be possible to better connect UFTI with central government's wellbeing and joint spatial plans, the National Policy Statement on Urban Development Capacity and the Proposed FDS.
- ii. The framework of UFTI including its vision and outcomes needs to be broadened beyond its current transport focus to respond to the four well-beings, how they relate to each other and be guided by community development principles<sup>1</sup>. We believe Urban Form should be considered first after which, responding transport requirements can be planned.

In addition to the settlement pattern distribution, the inclusion of placemaking, environmental and social considerations would produce the required robust and holistic approach. We suggest the inclusion of a new chapter (or revised Introduction) in UFTI that clearly outlines the;

- a. Outcomes sought
- b. Strategic aims
- c. Context (connecting spatial planning, demographic and other trends, how it builds resilience of the city to respond and react to transport network disruption and climate change).

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<sup>1</sup> A considerable amount of this information has already been articulated in previous SmartGrowth documentation

d. Links to other government plans and strategies

- iii. In order to see UFTI as part of a wider spatial plan, additional work is required on the specific investment objectives. We consider the investment objectives to be unclear and inadequate as they are currently stated in the Interim Report and should be formulated to assist in the delivery of social and environmental justice in the long-term. For example, the heading “Economic Prosperity” should be amended to “Prosperity” and include reference to economic, social, environmental and cultural prosperities.

In a similar vein, the investment objectives measures need to be redefined. For example, under Economic Prosperity, the current focus on freight needs to be expanded to include people commuting to work, study etc.

- iv. Under the Investment Objective “Environmental Sustainability”, the sole focus on reducing emissions is too narrow. Measures should also include qualitative assessments of waterways, biodiversity, green space, waste management practices, soil quality, air quality and noise protection.
- v. We believe the planning horizons in the Interim Report spatial plans need to be more explicitly defined. We would like to see the programmes integrated with the spatial plans and then divided into 0 to 10-year, 10 to 30-year, and 30 to 50 or 80-year horizons (as per terms of reference). While planning for the medium to long-term future we should not lose sight of issues requiring immediate attention e.g. housing.
- vi. Greater consideration should be given to economic development e.g forestry, kiwifruit, as a driver for infrastructure/urban planning and we note that the economy includes the whole of the BOP not just Western Bay of Plenty. In relation to urban development along the eastern corridor the following need to be considered:
- a. Reversed sensitivity as a result of rezoning from rural to residential
  - b. The infrastructure required to support an additional urban centre:
    - i. Water: significant expenditure required to address limited water availability in the eastern area
    - ii. Transport: extension of the proposed passenger rail from Omokoroa to Paengaroa to service Katikati. Consideration of how to access the Port on congested city routes
    - iii. Land: the land required (for up to 10,000 houses) needs to avoid low lying land, coastal areas and highly productive land. Much of the eastern corridor is low lying land susceptible to flooding and liquefaction. Consideration under the National Policy Statement for Highly Productive Land needs to be a priority.
- vii. Regarding the four programmes outlined in the report, we recognise the good thinking behind the options presented but do not believe that any of the options are sufficiently adequate on their own. We also raise a note of caution of the need to manage expectations raised by the discussion of passenger rail, which could lead to conflict.

- viii. Specifically, we:
- a. Do not support the Dispersed Growth (base case) option as it is a continuation of the status quo.
  - b. Do support the development of hamlets, particularly as an intermediate stage before urban centre development and particularly where small existing communities are targeted for additional small scale growth e.g. Pyes Pa, Whakamarama and Paengaroa
  - c. Do support the principle of Transit Orientated Development (TOD) and as such support the principles of programme three with the integration of rail enabled growth principles contained in programme one
  - d. Would like to see opportunities for high intensity in other centres rather than central city only e.g. at Papamoa
  - e. Would like to see greater innovation in use of passenger rail recognising that this is a long term direction. However we need to do planning and thinking on the basis that it will be one of the modes to shape urban development going forward.
  - f. Would see in principle, urban form leading transport considerations