

# MEETING – AGENDA –

Ngā Take

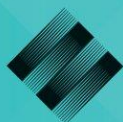


# POLICY COMMITTEE

Komiti Kaupapa Here

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**PP21-2**  
**Wednesday, 5 May 2021**  
**Council Chambers**  
**Barkes Corner, Tauranga**  
**1.00pm**



*Western Bay of Plenty  
District Council*

# Policy Committee

## Membership

<b>Chairperson</b>	Mayor Garry Webber
<b>Deputy Chairperson</b>	Cr Monique Gray
<b>Members</b>	Cr Grant Dally Cr Mark Dean Cr James Denyer Cr Murray Grainger Cr Anne Henry Cr Kevin Marsh Cr Margaret Murray-Benge Deputy Mayor John Scrimgeour Cr Don Thwaites
<b>Quorum</b>	6
<b>Frequency</b>	Six weekly

## Role:

- To develop and review strategies, policies, plans and bylaws to advance the strategic direction of Council and its communities.
- To ensure an integrated approach to land development (including land for housing), land use and transportation to enable, support and shape sustainable, vibrant and safe communities.
- To ensure there is sufficient and appropriate housing supply and choice in existing and new urban areas to meet current and future needs.

## Scope:

- Development and review of bylaws in accordance with legislation including determination of the nature and extent of community engagement approaches to be employed.
- Development, review and approval of strategies and plans in accordance with legislation including determination of the nature and extent of community engagement approaches to be employed.
- Subject to compliance with legislation and the Long Term Plan, to resolve all matters of strategic policy outside of the Long Term Plan process which does not require, under the Local Government Act 2002, a resolution of Council.
- Development of District Plan changes up to the point of public notification under the Resource Management Act 1991.
- Development of the Future Development Strategy and urban settlement plan.
- Consider and approve changes to service delivery arrangements arising from service delivery reviews required under the Local Government Act 2002 (provided that where a service delivery proposal requires an amendment to the Long Term Plan, it shall thereafter be progressed by the Annual Plan and Long Term Plan Committee).
- To report to Council on financial implications of policies and recommend any changes or variations to allocated budgets.
- Listen to and receive the presentation of views by people and engage in spoken interaction with people pursuant to section 83(1)(d) of the Local Government Act 2002 in relation to any processes Council undertakes to consult on under the special consultative procedure as required by the Local Government Act 2002 or any other Act.
- Oversee the development of strategies relating to sub-regional parks and sub-regional community facilities for the enhancement of the social and cultural wellbeing of the Western Bay of Plenty District communities, for recommendation to Tauranga City Council and Western Bay of Plenty District Council.

- Develop the draft Statement of Intent for any Council Council-Controlled organisation (CCO) and review, assess and make recommendations to Council on any modifications to CCO or other entities' accountability documents (i.e. Letter of Expectation, Statement of Intent) or governance arrangements.
- Approve Council submissions to central government, councils and other organisations, including submissions on proposed plan changes or policy statements.
- Receive and make decisions and recommendations to Council and its Committees, as appropriate, on reports, recommendations and minutes of the following:
  - SmartGrowth Leadership Group
  - Regional Land Transport Committee
  - Any other Joint Committee, Forum or Working Group, as directed by Council.
- Receive and make decisions on, as appropriate, any matters of a policy or planning nature from the following:
  - Waihi Beach, Katikati, Ōmokoroa, Te Puke and Maketu Community Boards,
  - Maketu-Te Puke Ward Forum
  - Kaimai Community Ward Forum
  - Katikati- Waihi Beach Ward Forum

## Power to Act:

- To make all decisions necessary to fulfil the role and scope of the Committee subject to the limitations imposed.

## Power to Recommend:

- To Council and/or any Committee as it deems appropriate.

## Power to sub-delegate:

- The Committee may delegate any of its functions, duties or powers to a subcommittee, working group or other subordinate decision-making body subject to the restrictions within its delegations and provided that any such sub-delegation includes a statement of purpose and specification of task.

Notice is hereby given that a Policy Committee Meeting will be held in the  
Council Chambers, Barks Corner, Tauranga on:  
Wednesday, 5 May 2021 at 1.00pm

## Order Of Business

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**1 PRESENT****2 IN ATTENDANCE****3 APOLOGIES****4 CONSIDERATION OF LATE ITEMS****5 DECLARATIONS OF INTEREST**

Members are reminded of the need to be vigilant and to stand aside from decision making when a conflict arises between their role as an elected representative and any private or other external interest that they may have.

**6 PUBLIC EXCLUDED ITEMS****7 PUBLIC FORUM**

A period of up to 30 minutes is set aside for a public forum. Members of the public may attend to address the Board for up to five minutes on items that fall within the delegations of the Board provided the matters are not subject to legal proceedings, or to a process providing for the hearing of submissions. Speakers may be questioned through the Chairperson by members, but questions must be confined to obtaining information or clarification on matters raised by the speaker. The Chairperson has discretion in regard to time extensions.

Such presentations do not form part of the formal business of the meeting, a brief record will be kept of matters raised during any public forum section of the meeting with matters for action to be referred through the customer contact centre request system, while those requiring further investigation will be referred to the Chief Executive.

**8 PRESENTATIONS**

## 9 REPORTS

### 9.1 MAYOR'S SUBMISSIONS ON BEHALF OF COUNCIL

**File Number:** A4049663

**Author:** Barbara Clarke, Senior Governance Advisor

**Authoriser:** Barbara Whitton, Customer Services and Governance Manager

#### EXECUTIVE SUMMARY



This report provides Mayor Webber's Submissions on the following matters for the information of the Policy Committee (all Councillors):

1. Submission on the Consultation Documents – Proposed Long Term Plan 2021-2031 (dated 18 March 2021);
2. Feedback on the Draft Bay of Plenty Regional Land Transport Plan 2021 (dated 25 March 2021);
3. Feedback on the SH2 Mangatarata to Katikati Speed Review (dated 20 April 2021).

#### RECOMMENDATION

1. That the Senior Governance Advisor's report dated 5 May 2021, titled 'Mayor's Submissions on Behalf of Council' be received.
2. That the following three Submissions, as attached, are received by the Policy Committee and the information is noted:
  - i. Submission on the Consultation Documents – Proposed Long Term Plan 2021-2031 submitted to the Bay of Plenty Regional Council (dated 18 March 2021);
  - ii. Feedback on the Draft Bay of Plenty Regional Land Transport Plan 2021 submitted to the Bay of Plenty Regional Council (dated 25 March 2021);
  - iii. Feedback on the SH2 Mangatarata to Katikati Speed Review submitted to Waka Kotahi NZ Transport Agency (dated 20 April 2021).

#### ATTACHMENTS

1. **Submission Consultation Documents - Proposed LTP 2021-2031 to BOPRC 18 March 2021** [!\[\]\(adb0331d22f78481623cc605df40612a\_img.jpg\)](#) 
2. **Submission Draft BOP Regional Land Transport Plan 2021 to BOPRC 25 March 2021** [!\[\]\(13ab9bea7a2b6465d20b6fafd4770e28\_img.jpg\)](#) 
3. **Submission - SH2 Mangatarata Katikati Speed - to NZTA 20 April 2021** [!\[\]\(8806d7205b0345b477642dd16156e48f\_img.jpg\)](#) 



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18 March 2021

Long Term Plan Submissions  
Bay of Plenty Regional Council  
PO Box 364  
WHAKATANE 3158

### **Office of the Mayor**

Name: His Worship The Mayor  
Organisation: Western Bay of Plenty District Council  
Postal Address: Private Bag 12803, TAURANGA 3143  
Daytime telephone: 0800 926 732  
Email address: matthew.leighton@westernbay.govt.nz

Dear Chairman Leeder

### **Submission on the Consultation Documents – Proposed Long Term Plan 2021-2031**

Thank you for the opportunity to submit on Bay of Plenty Regional Council's (BOPRC) Proposed Long term Plan (LTP) 2021-2031.

The Western Bay of Plenty District Council (WBOPDC) acknowledges the wide range of activities that BOPRC undertakes for communities in the Western Bay and the wider region. We appreciate the ongoing collaboration and cooperation between our Councils that deliver improved outcomes for our community, and look forward to working in partnership over the coming years.

We have reviewed BOPRC's Consultation Document. At a high level, we are disappointed to see that the preferred options in all topics (excluding topic seven) is to retain the status quo and do nothing. This is especially surprising given the magnitude of the proposed rate take increase. We expected a proactive commitment to action across these important topic areas from BOPRC was going to happen. The Consultation Document either speaks to a lack of willingness to act, a lack of willingness to be leaders and choose a preferred option, or a misunderstanding of the purpose of the LTP Consultation Document.

This has hindered any clear understanding of the actual cumulative rates implications of actually undertaking the work suggested.

We also wish to flag our concern at the level of inconsistency applied across the region with regards to water standards.

We also have concerns with how the public transport activity is to be funded with an apparent subsidy for Tauranga City.





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**Western Bay of Plenty District Council provides the following response to the topics set out in the Proposed LTP 2021-2031 Consultation Document:**

**Topic One – Climate Change Projects**

It is surprising that despite declaring a climate change emergency, BOPRC's preferred option is to not undertake any additional projects or increase investment in this area.

We support BOPRC taking an active role in the community and working on climate change responses.

**We support option 2** – Fund a subset of projects. Whilst we are comfortable with the financial effects of option 3, we do not necessarily agree with the potential projects identified.

Of the potential projects identified we support the facilitated co-ordination approach to climate change risk assessment and adaption plans; support the community conversations around adaption; and support education and engagement. We note that this was our preference in the BOPRC 2019 Annual Plan consultation, and we've seen little action since that time.

Collaborating with our communities to build resilience and work on the region's response to climate change is essential.

In the first instance, communities need consistent information and knowledge to support their decision making on actions to reduce emissions, and to adapt to the impacts of climate change.

BOPRC can show leadership in this area by working with other organisations to establish a one-stop central hub for information and knowledge sharing about climate change. This would bring together science, information and resources about climate change mitigation and adaptation, raising community understanding to support their decision making on taking action on climate change.

A specific budget for this work should be included across each of the 10 years, in the 2021-31 LTP.

We do not support the proposed project of running a one-off community Climate Change Forum. This is a duplication of work currently undertaken by the community, for example that of Envirohub BOP (such as the Sustainable Backyards events). Another example where partnership may avoid a duplication of effort is the Waiariki Park Region initiative. We request that the BOPRC carefully looks at its future work programme to avoid duplication and instead supports community partners.

We acknowledge the BOPRC's role in helping to restore/re-establish wetlands, and we wish to see this continued. These sites provide important carbon sinks, enhance local biodiversity and provide community spaces. We request that projects of this nature continue to be supported by BOPRC and that public access is enabled for these sites (whether they are on public or private land).







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We also seek to see more detailed thinking and recognition around how different land use in the Bay of Plenty can contribute to carbon sequestration and mitigate climate change impacts. In particular we point to the significant role of forestry and horticulture.

### Topic Two – Sustainability Funding

**We support option 4** – Introducing a combination of low interest loans, no interest loans and partial grants (for low income households) to support households to install sustainability improvements (e.g. solar panels, insulation, clean heating).

It pleasing to see the concepts and lessons of the 'Hot Swap' programme applied beyond Rotorua and to the rest of the region.

Such a programme has great potential to support real change. Capital financing is often the greatest hurdle for many to make these improvements. The improvements suggested, such as solar panels, insulation, clean heating, have the potential to contribute to efficient energy use, healthier homes and potentially lower power bills.

### Topics Three, Four, Five and Six – Public Transport Fares

Increasing public transport patronage is an important step to reduce congestion, encourage mode shift and reduce carbon emissions. We have previously supported BOPRC's initiatives.

We agree that current transport options may present a barrier to accessing tertiary education and job opportunities, because there is a lack of bus services, and because of the cost of the travel.

We note that we are actively committed to modal shift, with an increase in our walking and cycling budget proposed through our LTP, continued planning for park and ride facilities and commitment to the outcomes of the Urban Form and Transport Initiative findings. We look forward to continued work with BOPRC in this space.

We are disappointed that the excuse of Covid-19 has been used to justify not engaging with the community on the Regional Fare Review. Pre-consultation has been possible (WBOPDC has undertaken two rounds to inform our LTP, as well as significant consultation on the proposal to return Panepane Purakau to the hāpu of Matakana Island), and is beneficial for important community matters. There are a range of online tools that can be used in place of face-to-face endeavours. There were also many months in the latter part of 2020 where our sub-region has been in Level One.

Likewise, we are disappointed that the community is being asked to make a decision on matters with insufficient information. The Tauranga free school and tertiary education travel trials have been supported by us, but the lack of any analysis of their success (or otherwise) undermines the questions asked through the LTP. While we accept that the trial runs until December 2021, an interim evaluation would have been beneficial to make informed decisions. We request that an interim evaluation be conducted and the findings made public.





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We also request that BOPRC looks to explore alternative Public Transport methodology and evaluate the trial of the 'MyWay' service in Timaru. The provision of smaller vehicles and an on-demand service is innovative, makes the most out of technology, and could increase public transport patronage.

#### *Topic 3 – Free fares for school children*

**We support option 2** – free fares for school children during arrival/departure times.

Western Bay of Plenty District Council supports this on the basis that it is for travel to and from schools only and within school zone travel only. The fare-free bus travel for school students should assist with a modal shift from vehicles to public transport.

#### *Topic 4 – Free fares for tertiary students*

**We support option 2** – free fares for tertiary students at all times.

We support this on the basis that it is for travel to and from tertiary institutes only. The fare-free bus travel for tertiary students should assist with a modal shift and access to learning opportunities.

#### *Topic 5 – Free fares for community services card holders*

**We support option 2** – free fares for CSC card holders.

The fare-free bus travel improves access to work opportunities and should assist with a modal shift. We support fare-free travel within the region.

#### *Topic 6 – Flat fares for buses*

**We support option 2** – flat fares (intra-urban/intra-regional).

A simplified fare system should improve usage of public transport, aid in connecting communities and improve access to work opportunities. This will contribute to modal shift.

This support is however limited. We note that the fares for intra-region trips are still to be determined, which is of some concern. This raises questions around how the financial effects have been determined and what is actually being consulted on. There also needs to be clarity on how a flat structure is applied, i.e. how is 'intra-urban' defined and when does a trip become 'intra-region'.

#### *Tauranga Passenger Transport*

We do not support subsidisation of public fares in Tauranga.

Clarity is needed on where and when cross-subsidisation is being used. The Consultation Document states that reserve funding will be used for the Western Bay Transport Systems Plan (pg. 7 and 32), however the implications of this are not adequately discussed. The Revenue and Financing Policy sets out that up to 20% of funding of the Tauranga Passenger Transport sub activity is to come from reserves. We understand that this is from general region-wide reserves, not a specific transport or Tauranga-centric fund. Essentially this means that the rest of the region funds a







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service that directly benefits only Tauranga. This equates to a subsidisation for Tauranga ratepayers of \$18.50 in 2021 and of \$46.50 in year three. This is a significant level of subsidisation.

We support a beneficiary pays philosophy. We also support a consideration of socioeconomic deprivation profiles in policy setting and feel that the majority of Tauranga is capable of meeting the increased rating for their own services. Cross subsidisation cannot be justified in this instance. This is especially evident when compared to the profile of communities in the east of the region and the high levels of targeted rates levied for Rivers and Drainage Schemes there. There is a clear inconsistency of logic and outcomes.

We request that no reserve funding be used to subsidise Tauranga Passenger Transport.

### **Topic Seven – Regional Safety and Rescue Services**

#### **We support option 4.**

We fully support the introduction of a new targeted rate for regional safety and rescue services, where it delivers or exceeds the outcomes currently in our service level agreements with Surf Life Saving. However, additional clarity is needed to inform decision making.

The rate provides an effective and efficient means for regional safety and rescue service organisations (such as the Surf Life Saving New Zealand and Coastguard New Zealand) to have certainty of funding for their ongoing operations. These are vital safety and rescue services that benefit the Bay of Plenty's communities.

This is something that we have actively been recommending for the past three years and our support was noted when it was consulted on previously through BOPRC's 2019/2020 Annual Plan. BOPRC responded stating that 'Council agreed staff would work with key stakeholders, in particular territorial authorities and safety and rescue service providers, with the intention of implementing centralised funding approach for regional safety and rescue funding (option three) though the next Annual Plan or Long Term Plan.'

We are somewhat concerned regarding the actual mechanism and operation of the fund. The statement in the Consultation Document that 'Other Councils across the region may also provide funding to RSRS providers separate to this' undermines the intention to provide a centralised, efficient and secure funding source to the region's safety and rescue services. We have not been involved in any comprehensive conversations with BOPRC regarding this, as was promised through the response to BOPRC's 2019/20 Annual Plan.

There appears to be no detailed analysis to determine if the dollar figures proposed are sufficient for the purpose in the supporting documentation. WBOPDC alone funds Surf Lifesaving close to \$100,000 each year. We acknowledge that some communication with council staff has been made in February 2021, however this has been late in the piece and too late to inform either council's Consultation Documents





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in a meaningful way. There seems to be little analysis of actual current and future funding needs. We are not aware that any conversations have been had with relevant organisations, regarding future funding needs. We request that more detailed analysis be provided to the BOPRC councillors to inform their decision making. The option we therefore most closely align to is option 4, however noting that further analysis is needed before a decision can be made.

We also request that the method for calculating 'the extent of service provided by charitable regional safety and rescue services' in each district be made available. As this drives how much the rate for each district is calculated to be, understanding how this has been allocated would be beneficial.

We are disappointed that a project that has been worked on over the past three years by BOPRC, has failed to sufficiently address its initial stated aim or to sufficiently engage stakeholders. Increased detail is necessary for BOPRC to make an informed and positive decision for the community. Early communication with all councils in the region is also required around this, to avoid double rating of the community, as budgets maybe included to fund these organisations by both BOPRC and WBOPDC.

We support the introduction of a new rate and request that there is a commitment from BOPRC that Surf Life Saving be funded. We request a commitment that this funding will see the continued or increased levels of service for our area (patrols at Waihi Beach zones, Bowentown Beach zones, Maketu Beach zone and Pukehina Beach zone), as currently included in our service delivery contract with Surf Life Saving. We request to be informed immediately after a decision has been made on this topic in deliberations, in order to amend our LTP budgets. We request continued engagement from BOPRC on the application of this fund.

### Financial impacts

Further to the main submission topics, we largely support BOPRC's Financial Strategy approach.

We commend BOPRC's use of targeted rates and user fees and charges. This approach begins to provide a more equitable distribution of costs and acknowledges the variety of services provided and variety of stakeholders across the region. We would expect to see this approach expanded and taken further.

We are pleased to see that through on-lending BOPRC is encouraging Quayside to invest in the region.

We acknowledge that the Western Bay has relatively low overall average regional rates in comparison to other Territorial Local Authorities, however we note that the Western Bay of Plenty has relatively high land value than elsewhere in the Bay of Plenty and as a consequence property owners in the district pay a higher proportion of general rates than elsewhere. This does not necessarily reflect the level of benefit received, or the level of investment BOPRC makes in the district.

Accurately assessing the rates impact and being able to compare this across the region is difficult from the information provided in the Consultation Document. The land







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values and the average land sizes used to calculate the quartiles appear incredibly out of touch with current reality. The approach and values used also bear no resemblance to those used by either WBOPDC or Tauranga City Council (when focusing on Land Value). This is further compounded by the fact that not all properties in our district pay for drainage schemes. The whole district is over simplified hiding the real level of these rates through artificial averages and examples. As the basis of rating, we are concerned that this is confused and inaccurate.

We also wish to highlight that the labelling of the 'Rivers and Drainage Scheme' targeted rates (the correct name as per the Funding Impact Statement) as 'Urban River Scheme' is a significant misleading error. This clearly confuses the reader into thinking that BOPRC delivers Stormwater services in the towns (a District or City Council function) and suggests that the drainage schemes are solely for the benefit of urban areas (when in fact they primarily cover rural areas).

Reconsidering the presentation of this information would be beneficial. The misleading rates graphs should be addressed.

However, we would also like to acknowledge that the online rates calculator is a very useful tool and commend BOPRC on its use.

### **Additional points for comment**

#### *Rangiuru Business Park*

We are pleased to see progress with Rangiuru Business Park. This is an important project for the region and we encourage BOPRC to continue to urge on and enable the development through Quayside Holdings and to expedite delivery. We note that this has been an 'urgent' priority project since 2003. The sub-region is desperate for industrial land for development. The project will help focus planning and development for the sub-region. We look forward to working together to facilitate the new Business Park and continued planning for the future.

#### *Approach to water quality*

We wish to highlight the continuing inconsistent action and focus of BOPRC.

We note that BOPRC imposed significant requirements and costs on both the Council and our communities, to address concerns around harbour contamination from septic systems. Whilst we agree the intent of these changes, we do note the inconsistent approach with other areas and potential polluters. Several other councils in the region are operating systems that are either non-compliant or have an expired resource consent. Discharge from some farming operations does not appear to be sufficiently monitored or responsive action taken by BOPRC. Other areas with high levels of septic systems have not been addressed.

Waihi Estuary (Little Waihi, Pukehina) is in a serious state of decline, multiple presentations have been held on the evidence supporting this, however, we are yet to see any decisive action be undertaken by BOPRC. We are concerned that there is an inherent tendency to further research and analyse, watching the problem get worse, than a proactive response to deliver environmental improvements.





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We are also concerned at the possibility that one of the drains near Ford Road could discharge really poor quality water into the Kaituna system. This may negatively impact the Kaituna River system and Te Awa o Ngātoroirangi/Maketū Estuary, which has been an outstanding project to improve the water quality in our district. This issue is of further concern, as the possible discharge point for the poor quality water is in the vicinity of where a commercial crayfisherman keeps his daily catch into the water until it is ready to be sent off to market.

We seek a more consistent and proactive monitoring and enforcement approach from BOPRC. We also seek immediate monitoring of water quality around Katikati and analysis of the sources of contamination. We seek immediate investigation and action to address concerns about poor quality water entering the Kaituna system around Ford Road.

#### *Wairoa River*

We support Te Kauae a Roopu's request that the Wairoa River Catchment is made a priority/focus catchment by BOPRC and included in the programme of work dedicated to these catchments. The significant urbanisation around the catchment, both current and planned, is causing concern and risks creating greater impacts on the river. Monitoring and mitigation planning is a priority.

#### *River Scheme Sustainability Project*

We support the River Scheme Sustainability Project. Examining the catchments provided BOPRC flood management and assessing the levels of service, the economic value, the affordability of the schemes, assessing flood risk, the level of community acceptance of risk, and willingness to pay for flood protection is prudent.

We strongly request to be actively involved in the process and that iwi/hapū partners are actively included throughout.

We note that the Upper and Lower Kaituna Catchment Control Schemes are being considered separately (2021/22 and 2023/24 respectively). Whilst this may be how the schemes are currently organised and managed, we seek consideration if this is the best way going forward. The water body is one and the implications of decisions are interlinked, they flow-on or flow-up to the other. We request consideration of completing this review concurrently.

#### *Funds to support volunteers and community initiatives*

Having sought clarity from BOPRC staff, we understand from that the Regional Safety and Rescue Services fund does not replace the current Community Initiatives Fund. However, this was not clear in the Consultation Document. We are pleased to see this fund continue and support volunteer groups and local initiatives.

We note that an additional \$500,000 has also been 'tentatively allocated' to support work with the community and volunteers (pg. 9). We support this increase and wish to see it retained in the final budget. Through working with our communities and utilising volunteers wider benefits are often realised and greater value from the investment achieved.







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### *The Consultation Document*

Given BOPRC's public statements and 'promises it will try harder with communication', we are generally concerned at the quality of the Consultation Document and supporting materials. The document itself is confused and in some places misleading. The supporting material itself does not provide any additional clarity. This is a retrograde step considering previous good practice.

Some of the major errors and issues have been mentioned above. The main issue is the failure of BOPRC to justify why its preferred options are to do nothing, for the majority of the consultation topics, and the mismatch with the narrative provided.

The document does not appear to focus on the major matters and is full of vague, confusing or irrelevant statements. For example, the reader is told that 'We are very interested in getting community views on the right mix of funding sources, and what activities you would like to see greater investment in' (pg.5), yet there is no question around this and the 'comprehensive Financial Framework Review' referred to is not provided as a supporting document. The 'What you're getting' (pg.14) section further confuses the reader with irrelevant and meaningless targets and information on items that are not for consultation, such as 'We'll improve the quality of our policy reports from 80% to 90%'

There is no clear explanation of the cost drivers for the increase in rates in year one. There is some passing text on page 12, but this provides no real depth. This is more surprising given the generally low rating impacts of many of the options presented for feedback (99c and 11c in some cases). Whilst we have an understanding of some of the issues, the average reader in the community is potentially at a disadvantage. We request that an explanation of the cost drivers and their individual impacts on rates increases is provided as part of the final BOPRC LTP.

The supporting information is somewhat lacking. Additional supporting information to justify the topics and the options presented is not available. This undermines the ability of the public to make an informed decision. Furthermore, the key supporting document provided on the website is called 'Volume Two', and there is no explanation around what it is and where or what volume one may be! We are concerned that if the supporting information has been difficult to access and interpret for our staff, then it will be more difficult for members of the community, especially when they may not even be aware it exists.

Once again, thank you for the opportunity to submit our comments to the Long Term Plan 2021-2031. **We wish to speak to our submission** and look forward to seeing BOPRC respond to the points raised.

Please contact me if you have any questions.

Yours sincerely,

Garry Webber

**Mayor – Western Bay of Plenty District Council**





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## Office of the Mayor

25 March 2021

Bay of Plenty Regional Land Transport Plan Submissions  
Bay of Plenty Regional Council  
PO Box 364  
Whakatāne 3158

Name: His Worship The Mayor  
Organisation: Western Bay of Plenty District Council  
Postal Address: Private Bag 12803, TAURANGA 3143  
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Dear Cllr Thurston, Chair of the Draft RLTP Hearings Subcommittee,

### **Feedback on the Draft Bay of Plenty Regional Land Transport Plan 2021**

Thank you for the opportunity to provide feedback on the Draft Bay of Plenty Regional Land Transport Plan 2021 (RLTP). We would like to speak to our submission.

The Western Bay of Plenty District Council supports the collaboration with our neighbouring councils and taking a regional approach to transport planning. However, we also have some significant concerns with the draft RLTP.

We would like to emphasise that the purpose of the Land Transport Management Act 2003 is to "contribute to an effective, efficient, and safe land transport system in the public interest." This, and the Government Policy Statement on land transport, are the two key items that the Regional Transport Committee must be satisfied the RLTP contributes to and is consistent with.

The document as a whole appears to have been framed to meet the Bay of Plenty Regional Council's (BOPRC) focus areas, rather than reflect the actual needs of the land transport networks, those of the region's Road Controlling Authorities – i.e. District and City Councils, or the needs of all of the region's communities

We request that the prioritisation of projects and the weightings used to determine these be revisited, in order to align with the resolutions of the Regional Transport Committee of 7 August 2020. We request that the document be reconsidered with a regional lens, rather than what can be perceived as a level of bias towards BOPRC and urban centric projects.

We request that a number of additional projects be included and a number of minor changes be incorporated. A number of these projects qualify but are not funded, due to funding bands, by national land transport funding under Waka Kotahi funding







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requirements but are significant to the sub-region in supporting road safety, public health, economic development and new housing provision.

**Western Bay of Plenty District Council provides the following response to Draft RLTP 2021, additional detailed response is provided in the attached table.**

### Project prioritisation

At the 7 August 2020 Regional Transport Committee Meeting it was resolved that, for the Funding and Prioritisation Process, the Regional Transport Committee (the Committee):

*Adopts the nationally consistent approach developed by the Local Government NZ Transport Special Interest Group in conjunction with Waka Kotahi as the basis for prioritising significant activities in the draft RLTP 2021.*

This does not appear to have been fully carried through.

At the December Committee meeting, weightings based on this resolution were presented. These were:

- Climate change 20%
- Safety 30%
- Improving freight and regional resilience 35%; and
- Better travel options 15%.

After the December meeting and before the final draft was presented, these previously agreed weightings changed. In the draft RLTP, they are now:

- Climate change 25%
- Safety 30%
- Improving freight and regional resilience 10%; and
- Better travel options 35%.

We are highly concerned that these new weightings do not reflect the agreed direction and decisions of a Regional Land Transport Committee and do not "contribute to an effective, efficient, and safe land transport system in the public interest". These new weightings turn the focus away from transport and to climate change and emissions. It has skewed the project scores towards BOPRC's own public transport initiatives, rather than providing the project scores initially expected.

Whilst we acknowledge that some justification has been given in the draft RLTP, emphasising the importance of responding to climate change, we do not fully agree with the extent of the changes to meet this rationale. This is further discussed in the section below.

We request that the projects be reassessed and prioritised in line with the original weightings.





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### Climate change

We do not deny the urgency of responding to climate change. We support proactive evidence-based investment into both climate change adaption and mitigation. We acknowledge that Central Government have declared a climate change emergency. BOPRC are the only council in the region to have declared a climate change emergency. BOPRC's direction appears to have had undue influence in the draft RLTP, rather than formal Committee direction.

Alongside the change to the weightings, the narrative and questions in the RLTP summary document are overly weighted towards climate change.

Of the four consultation questions presented in the RLTP summary, three speak to climate change and alternative modes. The only one that does not, asks if the reader may have any 'other thoughts'. This is a disappointing and coloured consultation that essentially only asks one question. It appears the intent is to justify increased BOPRC investment into public transport, rather than to have a wider conversation around delivering reliable transportation networks, improving safety and building resilience, and addressing growth. This is paradoxically at odds with BOPRC's Long Term Plan 2021-2031 Consultation Document, in which BOPRC identify their preferred option as 'do nothing' for all four topics regarding public transport, and also for addressing climate change itself.

We would have preferred an approach based on the five key priorities, identified in the document and articulated well in the RLTP summary:

- Improving resilience within the transport system
- Supporting regional growth
- Improving multimodal access and choice
- Reducing road death and serious injuries
- Improving environmental sustainability.

This would have reflected the generally more balanced narrative in the draft RLTP itself. We would have expected this to have encouraged greater public input and more meaningful rounded feedback.

The recent Climate Change Commission's draft advice signals that one of the biggest contributors to reducing emissions is a change of the light fleet to electric vehicles. There is not a significant anticipated reduction in the overall motor vehicle fleet and only a minor reduction in distance travelled by private motor vehicle. Whilst public transport is an important element, the Climate Change Commission's draft advice recognises that "there are also areas where using public transport is not practical and ultimately some people want and need to use their own cars." This would suggest that the focus of the RLTP should be on enabling a transition and supporting an effective transport network for the whole region. The correct balance for investment must be struck.

Additional to amending the weightings, we request that the final RLTP and final RLTP summary documents ensure that a balanced narrative is achieved that recognises climate change, but as one of the five key priorities.







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### **RLTP narrative - Urban centric**

We are generally supportive of the narrative in the draft RLTP. The long-term objectives, and regional priorities identified and articulated in the document are considered sound.

Whilst we wish to see the large majority of this retained, we have some concern at an urban centric focus in the document.

There is a general lack of acknowledgement of the wider rural nature of the region and particularly our district. A consideration of the different effects of density and distance is lacking. Whilst there is some recognition of the lack of modal choice in the Eastern Bay of Plenty, this understanding is not applied further. The region is predominantly rural, and this is clearly evident in our district, with an approximate 50:50 split between those living in our towns and small urban communities and those living rurally. Travel between communities is essential for access to work, learning and play activities and the majority of our own transport network is in rural areas and will never be reliant on public transport. The Western Bay of Plenty sub-region is often referred to in the document when the action or issue described relates only to Tauranga City. We are a closely interlinked sub-region, but the failure to appreciate the rural population, high volumes of commuter traffic and the strong rural economy undermines the subsequent thinking and planning.

The draft RLTP appears to fail to address rural car dependency, or focus on the increased safety needs of road users in the rural areas (especially those using alternative modes to private car). We have proposed to invest significantly in our delivery of walking and cycling, through one of the key proposals in our LTP. The preferred option sees a total investment in walking and cycling of \$16.6 million over the next 10 years. We would like to see a wider recognition of the need for cycling and walking infrastructure and for safety beyond the urban centres, and recognition of its importance in connecting communities and contribution to liveable towns and communities.

### **Modal shift and the importance of rail**

We support work to achieve modal shift across our communities and for land transport broadly. A key factor in this is making better use of rail.

We are strongly supportive of any move to increase the proportion of freight using rail. The RLTP refers to the SH 1/29–East Coast Main Trunk Line Statement, and we are supportive of this integrated approach. We wish to see increased focus on making the most of the rail network.

We note that the RLTP fails to discuss rail freight efficiency in any detail beyond a superficial mention. Discussion regarding passenger rail is awarded far more space, despite significant hurdles in the short to medium term. Narrative and projects to enhance freight usage of the rail network should be reflected as a priority.

The rail network (and in particular the East Coast Main Trunk Line) has significant potential to alleviate pressure on the roading network and to encourage economic development through the region. We would like to express our support for the Kawerau Container Terminal, the recent funding provided by the Provincial Growth Fund is a





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significant positive move. Such a development could also benefit Rangiuru Business Park and allow better utilisation of the rail network generally.

Similarly, we wish to see inter-regional consideration of the rail network and how inland ports, similar to the Kawerau Container Terminal, in the Waikato may assist in reducing freight by road. This achieves better use of the rail network and reduces pressure on the roading network.

We are aware that the Rail Network Investment Programme is currently being developed and we wish to see further integration of this with the final RLTP, alongside a commitment to encourage freight onto the rail network and off roads.

### Project list

We specifically want to express our support for a number of projects and their inclusion in the project lists and details are provided in the attached table. However, several project descriptions, scope and timing need to be expanded to be clear that they cover implementation and to actually deliver works on the ground.

We support urgent investment into public transport and alternative modes early, particularly from TCC and BOPRC, as network improvements for the future sustainability of public transport to meet the growing population. Facilities need to be readily available when people move to a new area in order to encourage the forming of positive transport habits. With this in mind, park and ride facilities in the Western Bay of Plenty (or anywhere outside of Tauranga) appear to be missing from the project lists.

As identified in the draft RLTP and the Urban Form and Transport Initiative (UFTI), these park and ride facilities could significantly contribute to increased public transport use. References to Park and Ride in Omokoroa are made in the document, but it does not appear in the project lists. Again the Omokoroa and Te Puna park and rides are cited in reference to the WBOP Transport System Plan (TSP), but are missing in the RLTP. It is important to have these sites planned and delivered early for the growth areas in the district and are in place before the Takitimu Northern Link. We request that a new project be included in the list of projects.

We also seek to highlight the need to deliver projects on the ground. We are concerned that many projects in the TSP and subsequently in the draft RLTP have a long lead in time or are business cases only. We wish to see action taken and seek that project costs, scope and timings be adjusted suitably to deliver implementation.

### Minor edits necessary

A number of minor additions and amendments are needed throughout the document. These are set out in the attached table and form part of our submission.

Once again, thank you for the opportunity to submit our comments to the Draft RLTP 2021 and look forward to the subsequent changes and a RLTP that better contributes "to an effective, efficient, and safe land transport system in the public interest".







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We wish to speak to our submission.

Please contact me if you have any questions.

Yours sincerely,

A handwritten signature in black ink, reading "Garry Webber".

Garry Webber

**Mayor – Western Bay of Plenty District Council**





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Page	Topic	Position	Resolution sought	Comment
6 - 7	Foreword	Support	Retain	The Foreword is a good summary of the key issues affecting the region.
84 and subsequent project scores throughout	Prioritising significant activities	Oppose	Amend – Amend weightings and recalculate the priority scores using •Climate change 20% •Safety 30% •Improving freight and regional resilience 35%; and • Better travel options 15%.	As discussed above. This also aligns to the resolutions of the RTC.
10	Regional Land Transport Issues	Support in part	Amend- Under ' <i>Access and transport choice</i> ' – additional wording is requested to acknowledge that for many in the region the use of a private car is the only option, due to limited or no access to public transport and distance from services. Please amend to: <i>Access and transport choice - A changing demographic profile is giving rise to different transport needs in our communities (private vehicle use dominates mode share, 92% of trips to work are made in a car). Tauranga's aging and Rotorua's youthful population however, mean that for many people the use of a private car is not always an option for making everyday trips. Meanwhile access to alternative modes and physical distance from services and amenities means that many in the region are reliant on private vehicles.</i>	Whilst we generally support the issues identified, wording changes are necessary to better reflect the wider region.
10	Regional Land Transport Issues	Support in part	Amend – Under ' <i>Regional Growth</i> ' – additional examples of the impacts of growth in the region are necessary, as this goes beyond congestion. Increased traffic volumes from economic and population growth leads to the levels of service for road widths and road safety no longer being met and also increases maintenance needs. Please amend to read <i>Regional growth – Bay of Plenty is the third fastest growing region in New Zealand, and, between 2014 and 2019, experienced the largest percentage regional GDP increase in the country. Targeted investment is required to ensure adverse transport impacts of growth,</i>	Whilst we generally support the issues identified, wording changes are necessary to better reflect the wider region.



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			<i>such <del>and-as</del> traffic congestion <del>and</del>, pollution, and increased maintenance and reduced safety are avoided or mitigated.</i>	
16	Introduction	Support in part	Amend. Amend third bullet point to read: <i>Accessibility, within and between our urban centres, <u>between rural communities</u> and to and from our rural areas, by providing wider transport choices and services;</i>	Better recognition of rural communities is needed in the document.
26	Integrating land use and transport planning	Support in part	Amend. Additional sentences needed: <i>Integrating spatial and transport planning also includes retrofitting local walking and cycling networks into existing spaces, enabling modal shift for the existing population. Noting that creation of separate or off-road walking and cycling facilities means the location may not just be in the road corridor, but also in the rail corridor, reserves and other public land and private land by agreement.</i>	The document should reflect that intensification and enabling modal shift in existing areas is equally as important as planning for new areas.
38	Our communities	Support in part	Amend. An additional graph should be added to this section showing the main means of travel to school/education and relevant narrative discussion added to this section.	Infrastructure availability and safety can be a key barrier to multimodal travel for school pupils or tertiary students. Recognition of the scale of the issue and the need for targeted investment is needed here.
38	Our communities	Support in part	Amend. <i>Amend to read: Many of the smaller communities <u>in the region (particularly in the eastern and southern parts of the region)</u> have limited travel choices and rely heavily the roading network for safe and reliable access to social and economic opportunities. Those areas faced with static and declining populations present different challenges than for where the region is growing rapidly.</i>	Better recognition is needed that many residents and communities in the Western Bay also have the same issues. Rural car dependency is widespread, and public transport is not as regular as in Tauranga City.



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44	Our economy	Support in part	Amend. Additional text needed: <i>Beyond Rotorua, tourism is also a substantial economic contributor, however the profile (pre-Covid figures) has generally been significantly reliant on the domestic market (approximately 60% nationally and 80% for the Tourism BOP area).</i>	Recognition of the role of tourism to the regional economy outside of Rotorua is beneficial.
46	Our economy	Support in part	Amend. Additional text needed: <i>Cycleway tourism offers a significant opportunity. These routes are an economic stimulus and also benefit local connectivity.</i>	Further expansion on the importance of cycleway tourism is necessary.
48	Long term objectives, 10-year headline targets, and policies - Resilience and security - Objective 7	Support in part	Retain and add additional projects.	We strongly support this objective but would like to see it more explicitly translated into projects.  For example State Highway detour routes, as discussed further below.
49	Policies - Objective: Environmental sustainability	Correction	Correction to the numbering required.	Correction of a minor error where the '2' has been replaced with '1' for the numbering.
50	Policies - Objective: Environmental sustainability	Support in part	Amend. Policy 2.8 should be amended to: <i>Develop and expand inter-connected walking and cycling networks in urban and rural areas that prioritise direct connections to key destinations and that link communities and link marae to communities. (City and district councils, Waka Kotahi).</i>	The policy should recognise the wider region and rural areas.



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50	Policies - Objective: Environmental sustainability	Support in part	Amend. Policy 2.9 should be amended to: <i>Develop and expand inter and intra-regional walking and cycling networks for commuting, recreation and tourism that link to the national walking and cycling network. (City and district councils, Waka Kotahi, BOPRC, community groups, external funding).</i>	The policy should include reference to the role of other funders.
55	Regional transport priorities - Reducing road deaths and serious injuries	Support in part	Amend. Amend the text to read: <i>To improve road safety across the entire region, several safety initiatives within the RLTP programme are focused on improving high risk intersections, speed management interventions, local road width deficiencies, pavement surfaces and improving cycling facilities to provide safer access on the overall network.</i>	Increased recognition of the wider network is beneficial.
56	Regional transport priorities - Improving environmental sustainability	Support in part	Amend. Amend the text to read: <i>Park 'n' ride facilities at Papamoa, Wairakei, Te Tumu, <u>Te Puna</u>, and Omokoroa and elsewhere.</i>	Te Puna park and ride appears to have been missed. We also would like to see that park and ride facilities elsewhere are enabled.
56	Regional transport priorities - Improving environmental sustainability	Correction	Amend. Amend the text to read: <i>Implementing the Western Bay of Plenty Walking and Cycling <u>Action Plan</u> including the development of a cycleway along No.1 Road in Te Puke</i>	Minor correction of document title.
56	Regional transport priorities - Improving environmental sustainability	Support in part	Amend. Add a new bullet point: <i>Provide e-bike charging stations in co-ordination with the private sector.</i>	Recognition of e-bike charging alongside electric cars and buses would emphasise the multimodal opportunities of EV.
58	Improving multimodal access and choice	Support in part	Amend. Include an additional line:	We strongly support investment into multimodal access and





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			<i>Alignment between different planning regimes (e.g. RMA) is needed to better enable delivery to support modal shift.</i>	choice. We seek BOPRC commitment to look at how its current plans could better support and enable others' investment into this area.
59	Figure 20: Population accessibility by mode - Tauranga	Correction	Addition of a key to better understand the graphs.	Minor change to aid clarity.
61	Regional transport priorities - Improving multimodal access and choice	Correction	Please confirm the percentage for the below statement is correct: <i>An overwhelming majority (<b>191%</b>) of survey respondents said that Tauranga needs cycle paths that are physically separated</i>	Minor correction.
61	Regional transport priorities - Improving multimodal access and choice	Support in part	Amend. Addition of an additional bullet point under the section regarding key activities proposed in the RLTP: <i>Implement 60% of WBOPDC Walking and Cycling Action Plan in 10 years.</i>	This recognises the need to increase the access to and delivery of essential walking and cycling infrastructure. It also aligns with the UFTI findings.
63	Regional transport priorities - Improving multimodal access and choice - Rail – Freight and Passenger	Support in part	Amend. Addition of a detailed discussion regarding existing volume and capacity in the rail network for freight, the projected actual impacts of the Kawerau developments and inclusion of future initiatives regarding transitioning freight to rail (including inter-regionally).	We are disappointed that the opportunities to capitalise on existing rail capacity for freight are lost in the document, and instead over a page is committed to listing defunct and historic passenger rail services and substantial detail from the UFTI Programme Business Case. We wish to see a



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				considered analysis of rail freight capacity and future opportunities to increase this.
67	Regional transport priorities - Supporting regional growth	Support in part	Amend. Addition of an additional bullet point under the section regarding key activities proposed in the RLTP: <i>Omokoroa Structure Planning</i>	This recognises the additional project sought below. Planning is essential to enable growth in Omokoroa.
70	Regional transport priorities - Improving system resilience	Support in part	Amend. Additional text should be included in this section: <i>System resilience for the State Highway network often relies on local roading. Identified detour routes are necessary to enable the efficient response at a network scale. Funding of necessary upgrades to these detour routes would deliver more effective resilience with improved safety for the extraordinary traffic demands.</i>	System resilience should be better planned for and delivered. Funding to improve detour routes allows the increased traffic volumes to travel more efficiently. This enables the national network to better function without extensive delays due to closures.
75	Table 4: Strategic Interventions - Walkability	Support in part	Amend. Amend intervention title to: 'Walkability and cycle friendly'. Amend the first sentence to: <i>Walkable and cycle friendly neighbourhoods</i> Amend eight bullet point to: <i>Streets, walkways and off-road paths designed for pedestrians, cycles, micro-mobility and public transport</i>	Recognition that walkability and cycle friendly design is often closely interlinked.
89	Table 8: Public transport service improvements	Additional project	Add a new project – <i>Alternative public transport model trial, BOPRC, implementation, Evaluation and trial of alternative public transport provision using on demand services, Communities have access to an inclusive and reliable transport system that provides them with a range of travel choices to meet their social, economic, health and cultural needs. - 2021-2024</i>	We request that BOPRC looks to explore alternative Public Transport methodology and evaluate the trial of the 'MyWay' service in Timaru. The provision of appropriately sized



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				vehicles and an on-demand service is innovative, makes the most out of technology, and could increase public transport patronage.
91	Table 9: Public transport infrastructure	Additional project	Add a new project – <i>Park and ride sites northern corridor, e.g. Omokoroa and Te Puna – Indicative cost \$9.5 million per site – SSBC Light and implementation –2021-2024 and 2024-2027 (implementation).</i>	Park and ride facilities in the Western Bay of Plenty appear to be missing. This will align the RLTP with the TSP. Park and ride facilities can be delivered across the Western Bay to encourage public transport use. This delivers on objective 5 of the RLP, regarding access to travel choices.
91	Table 9: Public transport infrastructure	Additional project	Add a new project – <i>Te Puke to Rangiuru Business Park Cycleway, WBOPDC/Waka Kotahi, implementation, \$4 million, - 2021-2024</i>	This is a key project to connect communities with places of work and enables modal shift for commuting whilst also connecting communities.
91	Table 9: Public transport infrastructure	Additional project	Add a new project – <i>Maniatutu Road to Okere Falls - completion of Paengaroa to Okere Falls cycle trail, Waka Kotahi, implementation, \$1.5 million, - 2021-2024</i>	This is a key project to complete the cycle trail and link the network with that it Rotorua.
96	Table 10: Walking and cycling improvements	Additional project	Add a new project – <i>Existing SH2 (Omokoroa to Cameron Road) multimodal upgrade post Takitimu North Link completion, implementation, \$47.5 million, - 2025-2031</i>	This will align the RLTP with the TSP.
98	Table 10 : Walking and cycling	Support in part	Retain and amend - Amend to include the timing. 2021-2024 and 2024-2031	We strongly support the project, but wish to see





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	improvements - Western Bay of Plenty Walking and Cycling Implementation Plan			the timings included in the document.
99	Table 10 : Walking and cycling improvements - No.1 Road Te Puke	Support in part	Retain and amend - Amend the 'Phase' column to read, 'SSBC, implementation'	We strongly support this project and are planning for delivery.
99	Table 10 : Walking and cycling improvements	Additional project	Add a new project – <i>Waihi Beach to Athenree Cycleway, implementation, \$1.5 million, - 2021-2024</i>	This delivers an important link for the inter/intra-regional cycleway network.
99	Table 11: Local Road Improvements	Additional project	Add a new project - <i>Local road connections to the TNL and SH2, WBOPDC, implementation, \$5 million - 2024-2027</i>	This will align the RLTP with the TSP. We would anticipate this be funded through the NZUP. This delivers on objective 7 of the RLTP, The transport system enables people and goods to move efficiently and reliably to, from and throughout the region.
99	Table 11: Local Road Improvements	Additional project	Add a new project - <i>Omokoroa roading, WBOPDC, Implementation, \$43 million - 2021-2024</i>	Project necessary to deliver upgrades to Omokoroa roading to support growth. This delivers on objective 6 of the RLTP by enabling the efficient movement of



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				<p>people and goods. This includes \$14 million of CIP funding.</p> <p>The project is important for delivering, economic development and multi modal opportunities to enhance public health and environmental benefits.</p>
99	Table 11: Local Road Improvements	Additional project	Add a new project - <i>Omokoroa Structure Plan Stage 3, WBOPDC, Implementation, \$64 million - 2021-2031</i>	<p>This is to deliver planning for the Omokoroa Stage 3 Structure Plan roading. This is necessary to ensure a well planned roading component. This delivers on object 6 of the RLTP by enabling the efficient movement of people and goods.</p> <p>The project is important for delivering, economic development and multi modal opportunities to enhance public health and environmental benefits.</p>
99	Table 11: Local Road Improvements	Additional project	Add a new project - <i>'Revoked SH2 operations and maintenance', WBOPDC, implementation, \$1 million p.a. - 2024-2027, and \$1.5 million p.a. - 2027-2031.</i>	<p>With the planned revocation of the current State Highway 2 as part of the commissioning of the TNL, WBOPDC will be vested with a significant new portion of road with a</p>



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				corresponding increase in costs. This delivers on objective 7 of the RLTP. The transport system enables people and goods to move efficiently and reliably to, from and throughout the region.
103	Table 11: Local Road Improvements - Welcome Bay Road RP 7.5-8.2 km	Support	Retain	This is an important project for our district.
103	Table 11: Local Road Improvements - Welcome Bay Road RP 1.8-3.4 km	Support	Retain	This is an important project for our district.
103	Table 11: Local Road Improvements - Waihi Beach Road RP 0.8 km-2.4 km	Oppose	Delete.	This project is no longer included due to change in Low Cost Low-Risk funding limit increase.
104	Table 11: Local Road Improvements - Rangiuru Business Estate Interchange	Support in part	Retain and amend. 'Activity' title to be amended to 'Rangiuru Business Estate'. 'Description' column to be amended to include structure plan implementation (the urbanisation and development of roads in the area). Interchange costs \$36 million; structure plan roads \$15 million. Project involvement from Quayside Holdings. 'Timing' column to read 2021-2024.	The development of Rangiuru Business Park is an urgent priority for the region. This includes the delivery of the structure plan and improvements to the existing internal roads,



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				not just the interchange access to the Business Park.
106	Table 12: State Highway improvements - Katikati Urban	Support in part	Retain and amend. Timing should be 2021-2024 rather than 2027-2031.	This project is expected to be delivered within the next three years to address major ongoing issues. It delivers on multiple objectives of the RLTP and is consistent with the Upper North Island Freight Story and the One Network Framework (ONF) for State Highways passing through urban centres.
108	Table 12: State Highway improvements - SH 2 Katikati bypass	Support in part	Retain and amend. The 'Organisation' column should be amended to Waka Kotahi only. The 'Phase' column should be pre-implementation and land purchase. Primary 'RLTP Objective' should be objective 2 - 'The health damaging effects of transport are minimised, such as noise, air pollution and stormwater run-off.' The 'Timing' should be 2021-2031. Cost \$20 million.	This has project has been identified in the region as a priority in the past two RLTPs. The fact that it has not been sufficiently recognised here is a serious concern. The project delivers on several of the RLTP's objectives. It reduces the health impacts of transport on the Katikati community, including safety of side road access (objective 2); it enables the community to feel safer when travelling



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				around Katikati and makes walking and cycling more attractive in the town, thereby encourages healthier transport choices (objective 3); it provides a more efficient route delivering (objective 6); and aids resilience and security through the existing SH2 alignment providing a suitable detour route (objective 7).
108	Table 13: Proposed investment management activities - Activity Management Plan Development	Support	Retain.	We wish to see continual improvement in asset and activity planning.
109	Table 14: Low-cost low risk programmes - Western Bay of Plenty	Support	Retain.	This is an essential programme that delivers tangible benefits to road users.
111	Table 15: Activities the RTC requested be included in the Waka Kotahi Investment Proposal	Additional projects	Amend. Add new projects –  State Highway 29 detour route upgrades - Poripori Road, Crawford Road, Wairoa Road route – timing 2021-2027.	As mentioned above in our comments to Objective 7, Waka Kotahi investment into State Highway detour routes should be prioritised.



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			<p>State Highway 2 detour route upgrades – Esdaile Road, Old Highway, Barrett Road route – timing 2024-2031.</p> <p>State Highway 2 detour route upgrades - Old Coach Road route – timing 2024-2031.</p>	<p>These deliver on the need to build resilience in the network and assist in enabling strategic routes to remain open (target 24) albeit with a detour. These projects would upgrade roads to a suitable standard to function as a bypass when traffic is required to be diverted from State Highway through the local roads. We would expect this to be funded by Waka Kotahi, as it is to meet the national network's resilience, not to benefit local road users. We would expect investigations/business case in year one and implementation in years two to six.</p>
113	Table 16: Significant expenditure on activities not funded from the NLTF	Support	Retain funding for 'Takitimu North Link Stage One: between SH 29 and SH 2 near Te Puna' and 'Takitimu North Link Stage Two: Ōmokoroa to Te Puna'.	These are essential projects to the sub-region and have been expected for sometime. We are pleased to see progress and look forward to their full delivery.
114	Table 16: Significant expenditure on	Support in part	Amend. Amend the description:	This recognises the mixed funding for this project. Financial Contributions





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	activities not funded from the NLTF		<i>Implementation of urbanisation programme Construction of 1100m of new roadway including shared path and new public transport infrastructure to support housing supply.</i> Amend the 'Omokoroa Road Safety Upgrades and Urbanisation sites' line item total expenditure from \$14m to \$43m.	and rates funding is used alongside the \$14m CIP funding.
115	Table 17: Activities of inter-regional significance -SH 29 Piarere to Tauriko	Support in part	Amend. Further clarity is needed in the document regarding the 'SH 29 corridor improvements', and what is actually intended to be delivered. We suggest the text be amended to include: <i>including median safety barriers and sideroad roundabouts to achieve the full safety benefits of the project.</i>  Retain. 'SH 2 Waihi to Tauranga Corridor Programme' package of work.	We support any improvements on these routes, but seek further clarity around what is intended and the actual packages of works.
115	Table 17: Activities of inter-regional significance -SH 2 Waihi to Tauranga Corridor Programme	Support	Retain.	This is an essential project for the safety of our communities and those that travel through our district.
115	Table 17: Activities of inter-regional significance -Waihi to Waihi Beach Cycle Trail	Support	Retain.	This is strongly supported. Such a project will deliver multiple benefits and help link the Bay of Plenty cycling network with that in the Waikato region.
120	Other funding	Support in part	Amend. Crown Infrastructure Partners, Provincial Growth Fund and New Zealand Upgrade Programme funding to be included in the list.	Additional funding sources may have been missed off this list and are suggested for inclusion.
142	Figure 35: Bay of Plenty cycle network	Corrections required	Amend. Add the completed sections and proposed (to be completed) sections of the Paengaroa to Okere Falls Tourism/Recreation Route.	Several routes are missing from the diagram. This should be corrected.



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			Amend the Omokoroa to Tauranga Regional Strategic Route to be shown as completed. Add the Te Puke to Rangiuru Business Park route as a 'proposed regional strategic' route.	
144 (and relevant pages that reference these indicators)	Appendix 3 – Key Performance Indicators - Inclusive Access	Oppose in part	Amend. Additional target be added to measure the percentage of jobs and schools that can be reached by a 45 minute pedestrian journey, cycle trip, e-bike trip or e-scooter trip.	It appears that most of indicators under the objective of inclusive access do not necessarily recognise the limitations of access. Increasing walking and cycling is beneficial but may not increase access. We suggest the addition of a new measure to capture additional information and indicate inclusive access.
144 (and relevant pages that reference these indicators)	Appendix 3 – Key Performance Indicators - Inclusive Access	Oppose in part	Amend. In key performance indicator 15, consideration should be given to separating and specifying the targets for public transport and active modes, rather than bundling together as 20%.	The aggregation of these two separate modes of transport confuses investment priorities and assessment of trends.





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20 April 2021

Waka Kotahi  
PO Box 973  
Waikato Mail Centre  
HAMILTON 3240

ATTENTION: MANGATARATA TO KATIKATI SPEED REVIEW CONSULTATION

Name: Mayor Webber  
Organisation: Western Bay of Plenty District Council  
Postal Address: Private Bag 12803, Tauranga Mail Centre, TAURANGA 3143  
Daytime telephone: 0800 926 732  
Email address: [matthew.leighton@westernbay.govt.nz](mailto:matthew.leighton@westernbay.govt.nz)

Dear Sir / Madam

### **Feedback on the SH2 Mangatarata to Katikati Speed Review**

Thank you for the opportunity to provide feedback on the proposed speed limit changes to State Highway 2 (SH2) Mangatarata to Katikati. Our submission primarily focuses on the length of SH2 in our District.

We are supportive of interim safety and harm reduction projects in this corridor to address and reduce deaths and serious injuries on SH2, of which the speed review is just part. However, we seek to emphasise that reducing speed limits is not a replacement for continued investment in safety improvements, intersection improvements and a bypass for Katikati.

Taking SH2 North from Katikati is the only feasible route for access to the Waikato, Auckland and wider New Zealand for approximately half of our District. It is also a key entry point to the Bay of Plenty for freight, particularly that accessing the Port of Tauranga, and for visitors. A safe and efficient route is an absolute necessity for economic and social wellbeing and should be a matter of national importance.

We are pleased to see action being taken on SH2. The major safety concerns on this route have been an urgent issue for some time and have consistently been raised with Waka Kotahi and the Ministry for Transport. This section of the state highway has suffered from an unacceptably high crash rate which is exacerbated by the lack of capacity and degrading levels of service along approximately half the length. This has had a significant impact on our communities. Death, grief, life changing injuries and fear have afflicted our people.

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There have been 565 crashes on the stretch of SH2 between Old Tauranga Road and Tetley Road, between 2000 and 2020. This does not include those on local roads intersecting with SH2. Nine of these have been fatal and 49 serious. This is a serious toll.

We are supportive of a revision of the speed limits and recommend the below speed limits:

- Katikati urban 50km/hr (as per the current limit);
- Katikati township to Mathers Road 100km/hr (as per the current limit);
- Mathers Road to Kelly Road 90km/hr
- Kelly Road to Waihi Township 100km/hr (as per the current limit);
- Waihi Township north – retain existing 100km/hr sections (as per the current limit).

The section of road between Mathers Road to Kelly Road is particularly out of context with the rest of this stretch, with steeper gradients and tighter curves. We are therefore suggesting that this section be reduced to 90km/hr.

Amending the speed limits is only an interim measure and it will not address the underlying issues. It will not future proof the transport network. There will be continuing growth of vehicle movements and the need to address resilience and safety issues. This may be further exacerbated by any changes to the Ports of Auckland, as increased freight would be expected to use the Port of Tauranga, adding further transport movements beyond the high growth already projected. We seek that the speed limits be reviewed once the safety works are completed and safe speeds reassessed.

The primary underlying issue for this stretch of SH2 is capacity and safety improvements. Speed limit reviews do little to address this. There is a clear need to deliver a bypass for Katikati and, in the short term, a need for intersection improvements. We are pleased to see the Katikati Urban State Highway Improvements planned for and we expect these to be delivered urgently. It delivers on multiple objectives and is consistent with the Upper North Island Freight Story and the One Network Framework (ONF) for State Highways passing through urban centres.

The Katikati Bypass will deliver much needed safety, journey reliability and support for our growing communities. It enables the Katikati community to reclaim the town and enjoy a safer community. It builds resilience into the national transport network and it enables more efficient transport of goods to and from the Port of Tauranga and the Tauranga City generally.

We request that Waka Kotahi staff reiterate to the Waka Kotahi Board how improvements to this section of SH2 will provide multiple benefits expected to be provided from the government's transportation policy statement (GPS) and to emphasise the need for a bypass for Katikati.

We support the review and feel that changes to the current speed limits are required. It should also be emphasised that this is only an interim part of the solution for SH2. We are pleased to see continued safety improvements, but further intersection works, roundabouts and centre median barriers on the Waihi / Ōmokoroa section are needed. Improvements to the urban section of SH2 through Katikati and a bypass for Katikati should also be progressed with haste.

We acknowledge that the outcome of these proposals will influence the local road network. The local roads may need to match the speeds on SH2 and this could result in greater signage costs. We will need to consider this either through a bylaw process or a speed management plan. We would expect to see a full summary of the submissions received, as this will assist with our own review process. We note that the legislation to set out the process for developing and adopting speed management plans appears to have stalled, effectively placing councils in limbo between further bylaw reviews and waiting to develop a speed management plan as contemplated by these proposed changes.

We are more than happy to work with Waka Kotahi on any future proposals and look forward to seeing improvements in this corridor.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'G. Webber', is positioned above the printed name.

Garry Webber  
Mayor, Western Bay of Plenty District Council

**10      INFORMATION FOR RECEIPT**