

Draft Rotorua Future Development Strategy 2023 – 2053

Submissions & Feedback Summary Report



August 2023

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Appendix: FDS Growth Locations A3 Map (separate attachment)

1.0 Introduction and Purpose

The Future Development Strategy (FDS) is the long-term strategy for the development of Rotorua that provides for the social, economic and cultural wellbeing of its people. This replaces the 2018 Rotorua Spatial Plan and provides direction on how and where growth will happen over the next 30 years.

The FDS will promote long-term strategic planning by setting out how to achieve a well-functioning urban environment and provide sufficient development capacity to meet expected demand. The requirements for a FDS are set out in detail in Part 3 of the National Policy Statement on Urban Development (NPS-UD) 2020 under the Resource Management Act 1991 (RMA).

The NPS-UD states that every tier 1 and 2 local authority must prepare and make publicly available a FDS for the Tier 1 and 2 urban environment. Rotorua Lakes Council (RLC or Council) and Bay of Plenty Regional Council (BOPRC) are tier 2 local authorities 'jointly responsible'¹ for the FDS. A Joint Committee comprising elected members from both Councils and chaired by an Independent Commissioner has been established to focus on meeting these requirements for the process of preparing an FDS for the Rotorua. The primary purpose of the Joint Committee is, having heard submissions and deliberated on the matters raised, to recommend to RLC and BOPRC:

- any changes to the Draft FDS; and
- approval of a Final version of the FDS by both local authorities based on the recommendations of the Joint Committee.

The draft FDS was publically notified on 1 June and following the Special Consultative Procedure¹ (in accordance section 83 of the LGA) the public engagement period on the draft FDS was between 1 June and 17 July. The purpose of this report is to provide a comprehensive summary of all the submissions and feedback received.

The report has a separate A3 Pdf Map attachment to be used in conjunction with section 13 of the report

¹ Section 3.15 of the NPS-UD sets out minimum consultation requirements for developing FDSs. It is important to note that the Rotorua FDS will follow the Special Consultative Procedure (s83) under the Local Government Act (LGA). As it is not under the Resource Management Act (RMA) there is no appeals to the Environment Court; but appeals would be limited to High Court judicial review.

2.0 Overview of Submissions and Feedback

This report was informed by both submissions and feedback on the draft FDS.

In total there were 108 submissions received. The submissions consisted of:

- Online Survey Submissions 1-73
- Comprehensive individual submissions 74-108

The feedback was from:

- Iwi and Hapū Aspirations Pre-Engagement FDS Workshops/ Huis:
 - Central Area (Ngongotahā to the Puarenga Stream)
 - Eastern Area- (Tikitere to Ngāpuna)
 - Rural Area- (Otaramarae south to Rotomā)
 - Southern Area- (Whakarewarewa to Reporoa)
- FDS Public Engagement- Community Drop-in Sessions:
 - Central Area- Rotorua Library, Te Aka Mauri
 - Ngongotahā Area- Ngongotahā Community Hall
 - Eastside Area 1- Mokoia Community Association
 - Eastside Area 2- Rotorua Lakes High School
 - Westside- Linton Park Community Centre
- FDS Student Workshops with Students
 - Rotorua Boys High School- (15 year 12 and 13 students)
 - Rotorua Intermediate School- (25 year 7 and 8 students)
 - John Paul College- (40 year 12 and 13 students)
 - Toi Ohomai, Mokoia Campus, Rotorua- (20 carpentry and electrical students)
- Online Facebook Posts
- Rotorua Airport Meeting

3.0 FDS Outcomes & Themes

The Outcomes for the draft FDS sets out broadly what the FDS is aiming to achieve. This is informed by our understanding of national policy direction, iwi and hapū development aspirations, and community and stakeholder views. Achieving these outcomes as a whole across Rotorua, will require us to take a balanced approach. The outcomes are as follows:

<p>Culture</p> <p><i>Te Arawa reo, tikanga and values are woven into our communities and influence how our communities grow</i></p>
<p>Choice</p> <p><i>We have a range of housing choices to meet the diverse needs of our existing and future community</i></p>
<p>Access</p> <p><i>Our people live in a compact city where they can easily access jobs, services, education and quality open spaces</i></p>
<p>Connection</p> <p><i>Our thriving city centre is our social and economic hub – supported by local centres that meet local needs</i></p>
<p>Prosperity</p> <p><i>A strong economy will provide opportunities for our people to thrive. We enable businesses to grow in locations that meet their needs, and the needs of our growing population</i></p>
<p>Environment</p> <p><i>The wellbeing of our taiao is connected to the wellbeing of our communities. We are committed to protecting and enhancing our environment</i></p>
<p>Resilient</p> <p><i>We actively look for opportunities to reduce our environmental impact. Our communities are resilient to the effects of climate change and significant natural hazards</i></p>
<p>Investment</p> <p><i>We prioritise smart investment in safe and reliable infrastructure to enable and support growth, where and when it is needed</i></p>

The report below is structured broadly in relation to the above outcomes which has informed how the feedback and submission content has been themed i.e. ‘outcome related themes’. The approach to structure the report outputs this way, was taken to make it easier to focus any amendments to the draft FDS, following the hearings and deliberations, as the FDS chapters align to these outcomes.

Within the ‘outcome related themes’ this report, there are a number of sub-themes. These have been informed both by the sections within the draft FDS and the content of the feedback and submissions.

Beyond the 'outcome related themes' the submissions and feedback were also considered in relation to:

- The strategic approach underpinning the strategy
- Additional growth locations proposed through the submissions and feedback (to be considered with the map attachment)
- The implementation and monitoring of the FDS
- Proposed changes the FDS that are primarily editorial in nature

All references to submissions in this document are reflected in bold. In the case of organisations the organisation's name is used rather than individual who made the submission. If reference is made to an individual who has made a submission (in cases where the submitter is not submitting on behalf of an organisation), then the surname of the individual is used

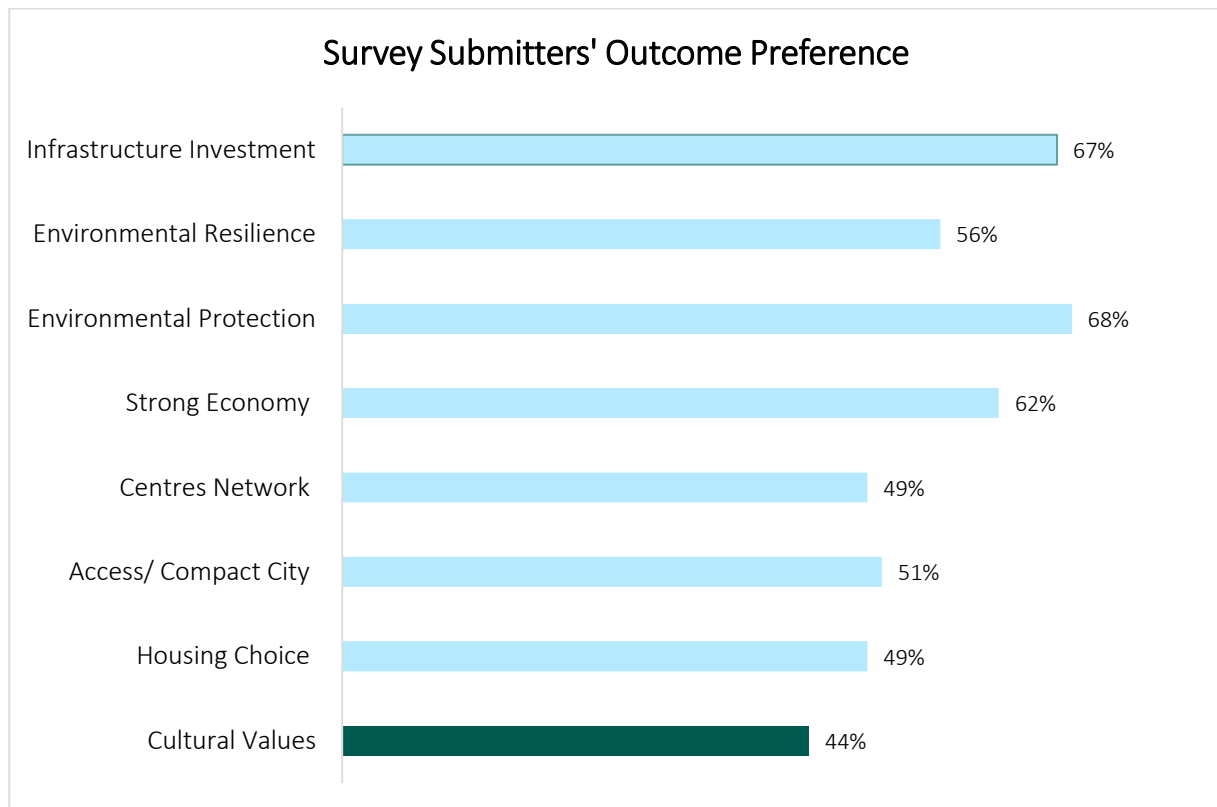
The relevant submission number, for ease of reference, is in brackets after the name of the individual or organisation e.g. **Rotorua Business Chamber (76)** or **Wylie (21)**. In relation to feedback the nature of the feedback is referenced, with more details provided in a footnote e.g. **Iwi² Aspirations Hui Feedback** or **Student³ Workshop Feedback**.

² Rural Area- (Otagamarae south to Rotomā) Pre-engagement

³ Toi Ohomai Mokoia Campus, Rotorua (carpentry and electrical students)

4.0 Culture – Te Arawa Reo, Tikanga and Values

4.1 Support for Outcome



A total of 44% of the online survey submitters⁴ indicated their support for this outcome.

4.2 Guiding Frameworks

4.2.1 Te Arawa Cultural Values Framework

Bennett (96) and **Te Arawa Climate Change Working Group (105)** supported the inclusion of Te Tūāpapa o ngā Wai o Te Arawa: Te Arawa Cultural Values Framework⁵ and the Te Matakiteanga a Te Arawa: Te Arawa 2050 Vision as a guiding document which expresses Te Arawa iwi and hapū aspirations for our communities.

The **Rotorua Business Chamber (76)** supported the cultural values framework drawn from the Te Arawa 2050 Vision as a valuable framework that needs to be integrated with a business perspective of the major issues (at a high level). **Ōwhata Kōhanga Rākau Housing Limited Partnership (84)** supported the importance of the Te Matakiteanga a Te Arawa, Te Arawa 2050 Vision.

⁴ Two-thirds of the submitters completed the online survey submission

⁵ Arawa Climate Change Working Group (105) indicated that by implication this puts Te Mana o te Wai as the priority in all decision making- which has been missing within RLC urban and district development planning and implementation up to this point

4.2.2 The Wellbeing Compass

The **Te Arawa Climate Change Working Group (105)** supported the recognition of the Mauri Ora Housing Development Wellbeing Compass (The Wellbeing Compass) as a good framework to consider as RLC implements the actions from the FDS. They indicated that to meet the aspirations of mana whenua for our communities and wider rohe, RLC must ensure the Wellbeing Compass⁶ is utilised as the framework and is integrated alongside Te Tūāpapa o ngā Wai o Te Arawa and Te Mana o te Wai (as part of the National Policy Statement for Freshwater Management 2020) into all policy, systems and processes developed as part of the Implementation Plan that will sit alongside the FDS. Utilising the Wellbeing Compass as a framework to implement the actions from the FDS is also the best practical approach to ensuring “Te Arawa reo, tikanga and values are woven into our communities and influence how our communities grow.”

4.3 Iwi and hapū values and aspirations

Rotorua Business Chamber (76) supported the culture statement Section 9.1 in the FDS. **Bennett (96)** commends RLC for its consultation with mana whenua.

Ōwhata Kōhanga Rākau Housing Limited Partnership (84) supported the Iwi and hapu values expressed in the FDS. **Waka Kotahi (77)** supported the Iwi and hapū values and aspirations being embedded into the FDS and the alignment with community values, housing and business needs and national policy direction.

The **Te Arawa Climate Change Working Group (105)** asked that ‘Rahui’ a Te Arawa value is incorporated into the FDS with finite projections for housing to ensure that “our rohe will not become overpopulated, our natural resources depleted, or our environment polluted.”

Facebook⁷ Feedback was that honouring the ‘legal agreement with iwi’ and supporting their aspirations for use of their land makes absolute sense. **Iwi⁸ Aspirations Hui Feedback** was that the community would like the mokopuna of today – by 2050 “to be healthy, happy, well adjusted, productive, safe (shelter) – ensuring children have good health, work, and self-esteem, safe and wholesome homes (a lot of people in this town do not have this)”. It was further expressed that aspirations for the communities in Ngongotahā, and Ōhinemutu are that they are ultimately places where mokopuna can be healthy, happy, well-adjusted and safe; where there are wholesome homes; where they are part of the decision making and where they are custodians of the land.

4.4 Decision Making and Relationships

4.4.1 Working in Partnership to achieve a more Integrated and Holistic Approach to Decision Making

Iwi⁹ Aspirations Hui Feedback was that those present at the hui wanted to see a holistic approach to future development. **Te Arawa Climate Change Working Group (105)** supported the consideration of ‘Relationships’

⁶ The submitter argues that RLC has obligations under the Local Government (Community Wellbeing) Amendment Bill to promote the social, economic, environmental and cultural wellbeing of communities. The Mauri Ora Housing Development Wellbeing Compass (The Wellbeing Compass) places the wellbeing of people, culture and te taiao at the core of Rotorua’s future housing provision and urban development at a range of scales from the city through to an individual site

⁷ James

⁸ Central Area (Ngongotahā to the Puarenga Stream) Pre-engagement

⁹ Southern Area (Whakarewarewa to Reporoa) Pre-Engagement

(Page 7 of draft FDS) captured as follows: ‘Better coordination and integration amongst council and government agencies to recognise, provide for and support hapū and iwi development aspirations; remove barriers; and strengthen hapū and iwi participation in central and local government decision-making.

Facebook¹⁰ Feedback was that we “don’t want World Economic Forum ideas for Te Arawa” and that Te Arawa should make their own plans. **Iwi¹¹ Aspirations Hui Feedback** was that “Māori know what’s best for Māori” and that the community knows what they want and how to manage it. They went on to state that it is only them who can provide appropriate support and solutions. The community elaborated that they have the expertise and knowledge of land and how it should best be used. They outlined that the wisdom and knowledge of the whenua in ‘this area’ is not being drawn upon when decisions are being made, which has come at the detriment of the community. They also noted concerns about the general lack of understanding about the history and the land in this area and future considerations for infrastructure.

4.4.2 The Retention and Enhancement of the Taiao

“A strong desire to protect and enhance the natural environment as change and growth happens, including through the use of green infrastructure, in both rural and urban areas”

Iwi¹² Aspirations Hui Feedback was that the environment has been “totally degraded” and there are aspirations for a healthy environment. The community expressed that they want a future where everything is ‘clean.’ The community expressed their concern about the implications in relation to the spiritual kaitiaki – the environment and its connection to the spiritual realm. The community further outlined that the natural environment needs to be healthy if the community want to live as their tūpuna had lived. For example, **Iwi¹³ Aspirations Hui Feedback** was that there needs to be a more sensitive, balanced and creative way of dealing with the geothermal resource for the residents.

Iwi¹⁴ Aspirations Hui Feedback was that more needed to be done to draw upon traditional processes and practices and that green infrastructure needs to be an important consideration to support any future development. **Iwi¹⁵ Aspirations Hui Feedback** to Council was that Council needs to be more innovative and not be content with the the status quo with respect to its impact on the natural environment. In this regard ‘green infrastructure’ needs to be enabled and promoted and traditional processes (that have been lost) need to be considered as potential ‘mainstream’ solutions.

4.4.3 Flourishing Mana Whenua Communities

The future development of the Rotorua district must support iwi and hapū communities to flourish and thrive.

Student¹⁶ Workshop Feedback was that one of the aspects that makes Rotorua a great place to live is the Māori culture. **Dillon (90)** indicated that with respect to ‘Culture – Te Arawa Reo, Tikanga and Values’ more effort needs to go into the draft FDS in determining how Māori can retain ownership of their land while deriving sufficient returns through, for example, leasehold arrangements. He stated further that it is an imperative that these lands remain in Māori ownership but still deliver higher value back.

¹⁰ Royal

¹¹ Central Area (Ngongotahā to the Puarenga Stream) Pre-engagement

¹² Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

¹³ Central Area (Ngongotahā to the Puarenga Stream) Pre-engagement

¹⁴ Rural Area- (Otaramarae south to Rotomā) Pre-engagement

¹⁵ Southern Area (Whakarewarewa to Reporoa) Pre-engagement

¹⁶ Rotorua Boys High School (Year 12 and 13 students)

The **Te Arawa Climate Change Working Group (105)** supported the consideration of ‘Flourishing Mana Whenua Communities’ in the FDS, while recognising the need for RLC to undertake careful planning to ensure future development supports the ‘first nation rights of Te Arawa hapū’ to flourish and thrive collectively within their traditional residential areas surrounding their marae and that future development does not continue to displace and exclude Te Arawa people. Further support was expressed for the iwi and hapū aspirations concerning the City Centre as Ngāti Whakaue have significant landholdings and investments in the city centre and they are important partners in developing and revitalising it.

Te Arawa Climate Change Working Group (105) also stated that the FDS must support Te Arawa energy security aspirations¹⁷ by recognising their rights to utilise their own dry wood in modern burners, traditional outdoor fires for traditional events, and their geothermal resources for heating, cooking and bathing.

Iwi¹⁸ Aspirations Hui Feedback was also provided in relation to the desired relocation of incompatible industry from Ngāpuna (supported by the draft FDS). **Iwi¹⁹ Aspirations Hui Feedback** was that the future re-zoning of land however, as proposed in the FDS, from industrial to commercial is not the community’s aspiration. The aspiration is for this area to be “a kāinga and for it to grow.” The community therefore do not want to be surrounded by commercial land uses either. They also communicated that it would be important to hold primary actors that have had a negative impact on the community to account i.e. so they take responsibility for their actions as they have had a negative impact on the on health of the community. **Iwi²⁰ Aspirations Hui Feedback** was also in the form of questioning whether the ground would likely be contaminated once the industry had relocated and how long it would we then take before/ if the land could be used again.

4.4.4 Whenua Māori and Papakāinga Development

“Celebrate and provide for the ongoing, lived expression of traditional patterns of settlement.”

Iwi²¹ Aspirations Hui Feedback was that the character of buildings are important in the cultural villages and that this should be managed at a hapū level. **Te Arawa Climate Change Working Group (105)** noted that RLC policy must recognise the ‘first nation rights of Te Arawa hapū’ to live collectively within their traditional residential areas surrounding their marae with their unique values, worldviews, taonga tuku iho (including their restored natural environment and indigenous taonga species)”.

Iwi²² Aspirations Hui Feedback was that the community don’t feel as though the proposed papakāinga rules through PC9 are enabling enough. **Ōwhata Kōhanga Rākau Housing Limited Partnership (84)** recognise the potential for whenua Maori to be developed to meet the housing needs²³ of Rotorua. **Iwi²⁴ Aspirations Hui Feedback** was that the long term aspiration (30 years into the future) is to have land returned through the Treaty settlement processes. Further **Iwi²⁵ Aspirations Hui Feedback** was that the underlying zoning is preventing people from building on their own land. The current rural zoning is restricting the community from

¹⁷ According to the submitter: over the past 15 years, council regulation has meant that old, inefficient solid fuel burners have been phased out, which has further impacted on the energy security and sovereignty of Te Arawa whānau and hapū. Te Arawa has a significant share of our lands in forestry and our whānau and hapū have used wood burners for generations as an extension of our traditional fires for heating, because of our access to free wood.

¹⁸ Southern Area (Whakarewarewa to Reporoa) Pre-engagement

¹⁹ Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

²⁰ Central Area (Ngongotahā to the Puarenga Stream) Pre-engagement

²¹ Central Area (Ngongotahā to the Puarenga Stream) Pre-engagement

²² Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

²³ According to the submitter: other developers have been supported by Council and given ‘the Partnership’ is an iwi led housing development, ‘the Partnership’ should be given a high level priority by Council to get the stormwater resolved.

²⁴ Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

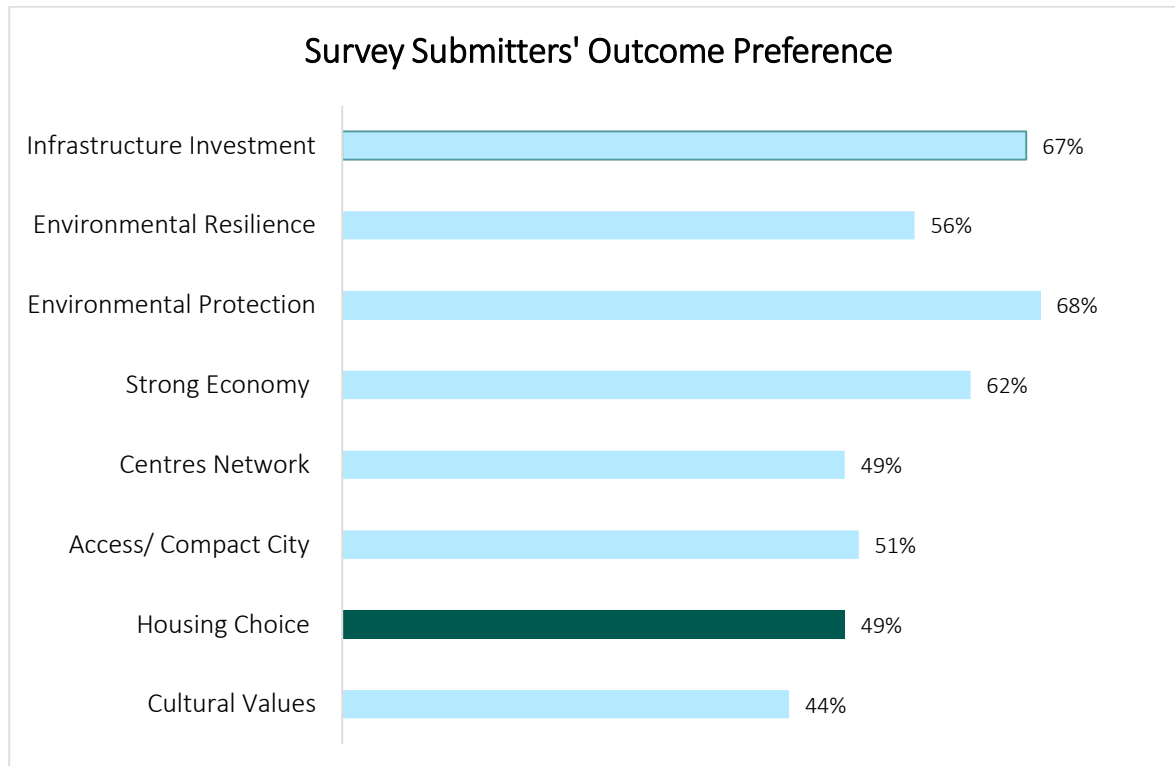
²⁵ Rural Area (Otaramarae south to Rotomā) Pre-engagement

developing on their whenua. In relation to Papakāinga the community has a lot of intergenerational homes and would like to build more whare to accommodate this living.

Te Arawa Climate Change Working Group (105) stated that if rural papakāinga communities are going to grow, it needs to be “on their own” terms. Additional growth would require a potential reconfiguration of the school network so these communities are supported. In this regard Te Arawa needs to contribute to decision-making to highlight and address the specific needs of our rangatahi, tamariki, mokopuna, and kohanga/puna reo and kura kaupapa Māori

5.0 Choice – Housing Choices Meet Diverse Needs

5.1 Support for Outcome



A total of 49% of the online survey submitters²⁶ indicated their support for this outcome.

5.2 Housing Choice

Student²⁷ Workshop Feedback in relation to the question “What is important to you in a future Rotorua?” was that they would like to see more houses. Further **Student²⁸ Workshop Feedback** was that they were interested in greater housing choice in the future. They expressed interest in homes of different sizes and in this regard listed the following typologies: multi-level homes, apartments²⁹, cabins, ‘family’ homes and ‘smaller’ homes.

Rotorua Business Chamber (76) supported Council enabling medium density housing- given Rotorua’s limited land supply, housing shortage and growing population. They further support FDS’s approach to diverse housing needs. **Ōwhata Kōhanga Rākau Housing Limited Partnership (84)** expressed the need for intensification of development across all parts of Rotorua to meet the housing needs of the Rotorua community. **Odim (89)** stated that greenfield developments should allow for a mix of housing types and sizes.

Whilst the **Ministry of Education (78)** supported this outcome, they indicated that they do have some concerns about how the draft FDS when implemented will achieve this outcome. While they acknowledged that

²⁶ Two-thirds of the submitters completed the online survey submission

²⁷ Rotorua Boys High School (Year 12 and 13 students)

²⁸ Rotorua Intermediate (Year 7 and 8 students)

²⁹ Big buildings with a penthouse, apartments overlooking the lake were communicated as examples

providing significantly more development capacity than is required to meet demand will provide the market with choice, they indicated that it will be difficult for providers of infrastructure (including additional infrastructure) such as themselves, to understand the likely timing and locations of growth.

5.3 Housing Need (Access to Homes/ Affordability)

Iwi³⁰ Aspirations Hui Feedback was that a lot of people are living in one house with rent being so expensive and the younger generation not being able to afford to buy a home. **Iwi³¹ Aspirations Hui Feedback** was that housing rates are high and that the community are struggling to pay rates. Further **Iwi³² Aspirations Hui Feedback** was that housing also needs to cater for an increase in families with children and not just retirement homes or papakāinga. **Student³³ Workshop Feedback** was that owning a house was important to them in the future. Further **Student³⁴ Workshop Feedback** was that cost of living needs to improve in the future. Students indicated that a positive future would consist of more affordable housing and better housing for the homeless.

Bennett (96) indicated that consideration needed to also be given to the overall design of the urban areas as this will have a particular impact on those that experience inequity. This includes children, those on low incomes, and those with limited mobility. **Bennett (96)** further indicated that there should be a mix of housing types, and urged that there should be a focus on the provision of an adequate supply of affordable housing, especially for families. **Wineera (40)** outlined 'multi-owned sections should be freed-up and small houses or 'flats' built for those landowners who are homeless. **Liz (37)** on the other hand questioned the rationale of adding more homes as there so many homes that need improvement. The submitter indicated houses are run down and that people can't afford to 'do-up' their homes.

Hampson (4) and **Eckersley (31)** said that Council needs to consider that a large number of homes are being used for tourist accommodation in the form of 'Air Bed and Breakfasts' (B&Bs) instead of residential. They feel if this was regulated better that there would be a number of residential homes available to address need. **Bennett (96)** argues that Council needs to take more of an active role in the housing market by for example requiring that developers include a proportion of affordable housing in housing developments. **Austin (18)** noted that we need more housing developments for residential home owners in Rotorua and not just Kāinga Ora houses or for first home buyers. The submitter further stated that the empty spaces and buildings within town needs to be utilised which may mean the development of town houses or more apartments

5.4 Social Housing and Emergency Housing Issues

Meza (99) outlined that addressing the housing issue which is paramount for Rotorua, needs to improve the city rather than impacting negatively³⁵ on the current lifestyle that is offered. The submitter pointed out that social housing has had a negative impact on Rotorua resulting in many people leaving Rotorua, because of the Government Policy to house people during Covid 19. The submitter noted that the levels of criminality are higher than ever. **Wylie (21)** argues that social housing has resulted in an increase in anti-social behaviours and also burglaries in the neighbourhood.

³⁰ Rural Area (Otaramarae south to Rotomā) Pre-engagement

³¹ Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

³² Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

³³ Rotorua Boys High School (Year 12 and 13 students)

³⁴ Rotorua Intermediate (Year 7 and 8 students)

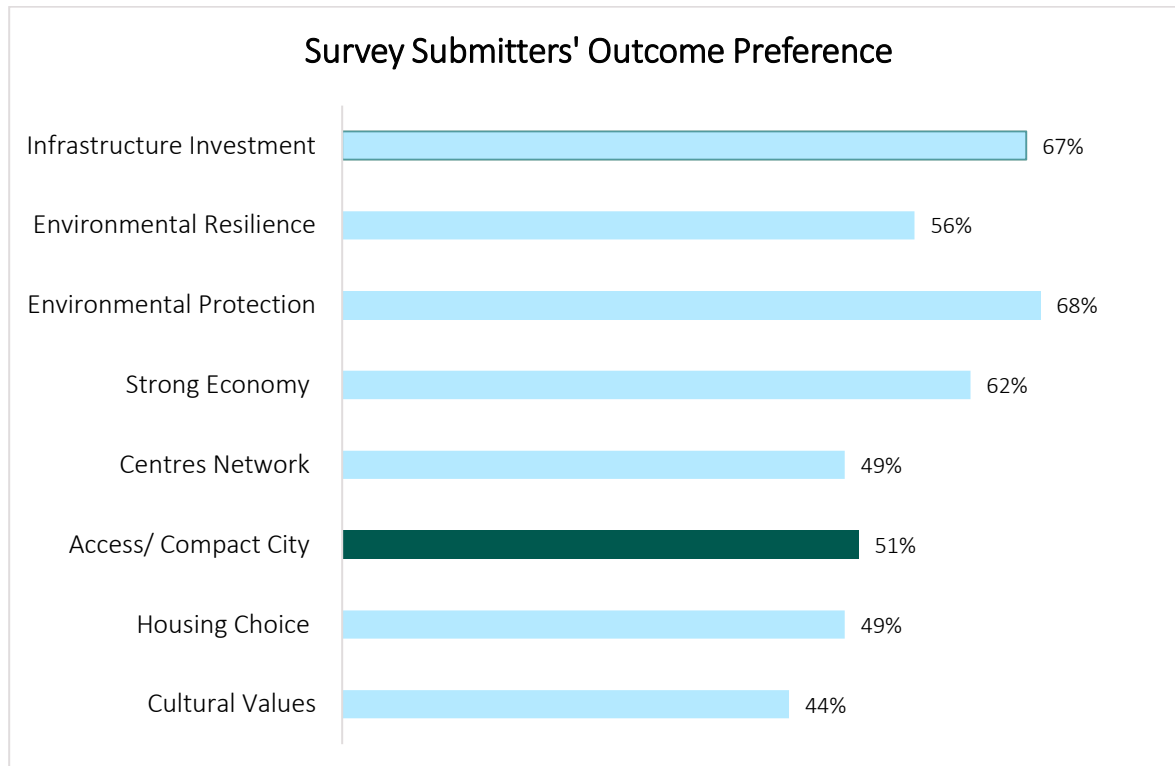
³⁵ According to the submitter: "It is difficult to plan without knowing first-hand the impact that any development would have on the areas and the people living there."

Cole (48), who has lived in Rotorua for 45 years, stated that he didn't think Rotorua is a thriving and growing community as emergency housing and other poor council decisions has been destroying the Rotorua. **Robertson (107)** outlined that eight years ago his neighbourhood was safe and walkable and that social housing has resulted in an increase in crime and that planning for high density will make matters worse. **Iwasaki (44)** stated that no more homes should be provided for the homeless and that Rotorua needs to be "made into a safe city."

Skilling (39) argues that Rotorua does not need any more central city housing as Glenholme has a lot of retired residents that are now living in an unsafe area with high levels of crime because of all the homeless that have been accommodated. For this reason **Save Glenholme (50)** stated that they do not support intensification anywhere in the Glenholme suburb. They stated that they believe that the well-being of people depends on them living in a safe and secure neighbourhood and do not believe that high density intensification will contribute positivity to this. **Finch (14)** indicate that it would not be desirable to have homeless in six storey buildings in Glenhome, as we already have homeless in motels. The submitter believes the homeless should rather be located on the outskirts of the urban area.

6.0 Access – A Compact City

6.1 Support for Outcome



A total of 51% of the online survey submitters³⁶ indicated their support for this outcome.

6.2 Compact City Approach vs Greenfield Expansion

6.2.1 Compact City

Stace (100) argued that it should be a basic requirement of any urban development strategy to promote development within the existing urban area and in priority areas on the fringes of it. The submitter noted that there were references in the consultation document to promoting a compact city and growth within existing neighbourhoods, so that development occurs where infrastructure already exists, and in areas close to existing public transport, shops and community facilities.

Kāinga Ora (75) and **Rotorua Business Chamber (76)** supported the compact city with intensification approach outlined in the FDS. **Waka Kotahi (77)** supported the stated intent of the draft Strategy to focus on growth through intensification³⁷, and the stated aspirational split of intensification versus greenfields growth. **Odim (89)** also supported the proposed mix of intensification and greenfield development for housing. **Toi Te Ora**

³⁶ Two-thirds of the submitters completed the online survey submission

³⁷ Waka Kotahi strongly favours growth through intensification, due to the transport, and other, benefits of this form of growth and the alignment of it with our investment priorities. They however acknowledge though that intensification is unlikely to be able to meet all future demand for housing and support some managed greenfield expansion around the existing urban area

Public Health (108) indicated that RLC are targeting the best locations for city development because they are an extension of existing development (urban environment), which is encouraging to see.

Rotorua/ Taupō Federated Farmers of New Zealand (82) also supported the prioritisation of compact growth in existing urban areas. The submitter emphasised that promoting³⁸ a compact city is best achieved in a managed way, within existing neighbourhoods. It was further argued that accommodating growth in existing urban areas is an efficient use of infrastructure, creates vibrant cities, reduces emissions, and limits urban encroachment and fragmentation of rural land. Council's proposal for 57% of total growth to be delivered³⁹ through intensification in the existing urban areas was therefore supported by this submitter.

The **Ministry of Education (78)** also supported the compact city outcome as it facilitates easy access to jobs, services, education and quality open space, in a way which protects and enhances the taiao. The Ministry does however have some concerns about how the draft FDS will be able to achieve this outcome by prioritising intensification whilst also prioritising immediate release of additional greenfield land- (at a time when there is still a supply of existing zoned greenfield land). The Ministry went on to state that the Rotorua Housing and Business Development Capacity Assessment 2021 (HBA) noted that more greenfield opportunities will have a dampening effect on infill activity and that these tensions and the potential impact on the FDS outcomes require careful consideration.

Goodwin (51) also indicated that there should not be too much greenfield and that Council should be looking for opportunities for residential growth within current foot print of the city. The submitter stated that this has been New Zealand's problem for well over the last 40 years and that some people are just too NIMBY (Not in My Back Yard) and stated "we need to change our thinking!" **Anonymous⁴⁰ Feedback 1** outlined that the Central area has the greatest amount of infrastructure already accessible here, notable with several different road access options. The submitter indicated that other growth options would add congestion to the already limited road options for getting across town and that it was therefore important to minimise urban sprawl. **Pickering (33)** stated that there should be no residential growth on any farmland, reserve land or any currently undeveloped land irrespective of who owns it.

6.2.2 Greenfield Expansion

A number of submitters did not support the notion of a compact city primarily because they were not in favour of intensification in the central part of the City. **Bunker (59)** stated that the central area is already a compact area and **Skilling (39)** indicated that Rotorua does not need any more central city housing. The submitter stated that there is plenty of room in the suburban areas and that work has already begun on some of the housing projects noting that the suburbs have shops and bus services. **Lewis (57)** outlined that Rotorua does not need to be a compact city, full of high density residences and felt that this would tarnish Rotorua's image. **Cantel (41)** stated that proposing the development in well populated where infrastructure is struggling to service the population in these areas is a concern. The submitter highlighted that the addition of "six storey buildings" would add additional pressure on what is already "stretched". The submitter stated that Ngongotahā would be better placed to support growth as it has the land available and new infrastructure can be built to support the additional housing needed to service the growth. **Quinn (38)** also argued that there are suitable "greenfield" options where high density housing can be built in the suburbs with minimal impact on these

³⁸ According to the submitter: Council has a role to facilitate and manage growth to achieve a well-functioning urban environment

³⁹ According to the submitter: promoting and prioritising compact growth balances housing with land available for primary production

⁴⁰ Anonymous Survey Submission

areas. The submitter stated that the provision of an adequate bus service will facilitate easy access to supermarkets and other services located in the city centre.

Cameron (49) stated that the well-being of the communities will not be enhanced by intensifying the inner city and surrounding suburbs. The submitter stated that people need space to be able to live harmoniously and objects to the concept of a compact city. The submitter argued that Council is already supporting Kāinga Ora developments within a five minute walking distance of town and that this is not a good look for Rotorua as a tourist town. The submitter went on to state that the problems associated with some Kāinga Ora tenants are well documented and so “most residents do not want this.” The submitter indicated that the well-being of communities will not be enhanced by intensifying the inner city and surrounding suburbs. The submitter then claimed the development should occur on the outskirts of the city. The submitter stated that the majority of people have cars so Council does not need to “make the excuse that people need to be within five minutes of their workplace, school etc.” The submitter stated that even when people do live close to the school in their catchment area, “they still drive their children there,” so their behaviour does not change.

Liz (37) also supported the view that city growth should be on the outskirts of the city as there is a large amount of farm land in this location. The submitter stated that there are already developers buying up single properties and adding four units in it to make it compact living like Auckland and Hamilton. **Sinclair (54)** said new residential properties should be located out of Central Rotorua on land leading out of Ngongotaha and out Eastside. **66 McFetridge Drive (92)** stated that the FDS should (similar, to Papakāinga development opportunities) enable/support farming land use change within the urban environments (especially given modern trends of working from home, electric vehicles, solar energy, etc.) where there is high demand for lifestyle lots, capacity, improved environmental outcomes, and the ability to connect to and provide first world services. The submitter stated that well thought out land use change should be accommodated in Rotorua’s FDS to achieve the requirements of the NPS-UD principles and/or objectives. **Scholte (12)** argued that to support development ‘development restrictions’ on rural land should be removed, i.e. The Rural One Zone with a minimum lot size of 10 acres and no ability for the land owner to subdivide to allow more housing.

6.3 Heights and Densities

It is important to note, before considering this section, that Rotorua is enabling higher densities through its Housing for Everyone – Plan Change 9 (PC9), which is a change we are making to our District Plan to encourage greater development and housing choice, and it forms part of a series of actions the Government has developed to address housing in New Zealand. Specifically, PC9 proposes changes to better support intensification through enabling medium density living across most of our urban area, and high density living close to and in the city centre and in our commercial centres. The statutory hearings for PC9 were held between 14 August to 22 August 2023. As a “specified territorial authority” RLC introduced Medium Density Residential Zone Standards (MDRS) to the District Plan on 20 August 2022 (i.e. now operative). The MDRS⁴¹ essentially introduces a package of mandatory provisions that will enable landowners to build up to three houses of up to three storeys on their site as of right (i.e. no resource consent under the RMA- with these houses proceed straight to applying for building consents under the Building Act), on most sites, unless resource consent is required for another reason.

⁴¹Mfe MDRS Guide- [Medium Density Residential Standards: A guide for territorial authorities | Ministry for the Environment](#)

6.3.1 Support for Higher Densities

Ōwhata Kōhanga Rākau Housing Limited Partnership (84) supported the promotion of housing intensification in all areas of Rotorua. The submitter outlined that higher density development will provide much needed housing for Rotorua, creating housing options and more cost effective housing in more communities. The submitter felt that the draft FDS should be amended to reflect an objective in relation to this. **Rotorua/ Taupō Federated Farmers of New Zealand (82)** indicated that growth should be accommodated with higher density housing to create vibrant towns and lower carbon and physical footprints. **Sigma Consultants Ltd (94)** stated that the FDS anticipates a significant shift in housing typology towards terraced and apartment typologies and that this is supported and critical from a climate change perspective. The submitter added that other mechanisms to change people's expectations and investment preferences are needed to achieve this change on the ground. **Kāinga Ora (75)** argued that additional⁴² land (to the extent proposed in the FDS) should be provided for high density housing (i.e. all of the residential land south of city centre, east of SH5, west of Fenton Street, and north of SH30).

6.3.2 Concerns with Higher Density

A number of submitters expressed concerns with Council enabling any higher densities. Most of the concerns were associated with enabling higher density in the Glenhome area. In this regard **Dillon (90)** stated that with respect to "the second bullet point of section 8.0 of the FDS," change as it is described in that point is opposed by many residents of Glenholme, as evidenced through submissions against PC9 and the draft FDS. **Cleland (102)** and **Perez (13)** stated that 'high-rise development' should not be part of the strategy, regardless of timing but offered no reasons for this. The responses from submitters opposing high density are briefly provided in relation to common themes below:

Concerns about Shading

Bentley (16) indicated that 6 or even 3 storey buildings should be not allowed as of right. They should be monitored and only allowed in appropriate places. The submitter stated that the same rules re sunlight etc. as in the District plan must be taken into account as must the neighbours support be obtained. **Leonard (24)** also does not support the building of multi-storied houses if they over shadow existing single storied homes, reducing the light (and heat) for those occupants. The submitter outlined that if these properties need to be incorporated into existing neighbourhoods, this should be done in a way where this effect doesn't happen. **Sinclair (54)** stated that building these multi-story apartment typologies in central Rotorua, which is home to many of our elderly, will create considerable issues such as reducing sunlight in back yards, and on vegetable gardens and for drying washing on washing lines.

Geothermal Issues and Soft Ground

Lewis (57) stated that Glenholme is geothermally hazardous and therefore not ideal for multiple storied buildings. **Cameron (67, 69)** and **Save Glenholme (50)** indicated that they do not support intensification and high density residential development in Glenholme and other areas where there is a known high geothermal risk. **Matthews (15)** felt the ground would not support higher density developments in this area.

⁴² According to the submitter: they are willing to work with Council's advisors to broaden its evidence in this regard

Character/ Amenity

Although **McCabe (101)** supported housing choice the submitter indicated that housing should not be ‘crammed’ into developed areas unsuitably/ inappropriately, such as high-rise buildings among single story dwellings. The submitter indicated that it would be important to ensure that citizens live in homes and situations where they can prosper. **Page (45)** added that it would be great if construction was ‘mindful of existing housing’ and didn't try and “cram extremely high-density buildings” onto sites that would be better suited to typologies in line with the character for the area (although still providing for more people).

Wylie (21) outlined that living next door to apartment blocks would not be desirable and rather supported residential growth in areas such as the city centre itself, where there is little to no impact on established residential neighbourhoods. **Searancke (11)** also argued that high density should be in the CBD stating that six storey buildings would destroy the character of Glenholme. **Buchan (6)** stated that this type of high density development would destroy the existing street landscapes and would offer no protection to existing property owners who could be adversely affected by shading by this type of development.

Quality of Life (Safety, Noise, Privacy)

Quinn (38) and **Cleland (102)** stated that there would be a negative impact on the quality of life of Glenholme residents if high-intensity housing (three to six storey) was to be built in this suburb. **Cleland (102)** and **Lewis (57)** emphasised that Glenholme is home to many elderly people that need to feel safe as they ‘age in place.’ **Matthews (15)** felt that the impact of high density on the retired community of Glenholme would be detrimental (which includes a negative impact on their investment i.e. decrease in property values). **Cameron (67)** and **Cameron (69)** also do not support intensification anywhere in the Glenholme suburb indicating the wellbeing of people depends on being in a safe and secure neighbourhood and that intensification does not enable this. In this regard **Cameron (67)** and **Save Glenholme (50)** opposes any further Kāinga Ora development within Glenholme suburb. **Sinclair (54)** also stated that privacy as concern associated with high density (multi-storey) as properties will be looked into, and with multiple families quiet enjoyment of a backyard will disappear

6.3.3 Medium Density

Iwi⁴³Aspirations Hui Feedback was explicit in terms of support for the medium density residential standards enabled through PC9. **Dillon (90)** however pointed out that medium density across the Rotorua residential urban area is strongly opposed by many residents, and is inappropriate in “a provincial city like Rotorua.” The submitter went on to state that the reasoning behind inviting such dramatic changes in urban form are unclear, particularly when many other actual Tier 1⁴⁴ cities around New Zealand are strongly opposed to blanket application of medium density, particularly Christchurch which is six times as large as Rotorua. The submitter outlined that the political sustainability of the medium density that has now been applied to most of the residential zones and promoted through the FDS is highly questionable. The submitter argued that National has campaigned on “scrapping the Act behind the provisions” and that given the degree of uncertainty around the longevity of such provisions and the potential impact of their removal on the draft FDS, it would be better to at least include an alternative scenario that does not consider these provisions. **Rotorua Business Chamber**

⁴³ Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

⁴⁴ Rotorua being classified as a Tier 2 urban environment. On 14 March 2022 an Order in Council (“OIC”) was made to incorporate RLC in the requirements of the Amendment Act, after RLC requested to be included, based on its acute housing need. Rotorua’s inclusion means that it is now a “specified territorial authority” under the Amendment Act but still remains a Tier 2 urban environment.

(76) stated that care needs to be taken when ‘implementing’ medium density along main access routes (such as SH5) into the city (for ‘safety, tourism, lifestyle and aesthetic’ purposes).

Hidden Name H (98) and **Wylie (21)** indicated that Council should not allow three-storey and multi-storey housing in the current residential areas. **Hidden Name H (98)** argued that this would devalue the only real asset for most citizens and potentially take away their peace, privacy, light and security (with lots of additional people and visitors in their streets). **Lincoln (29)** stated the idea of 3-storey apartment style buildings in central and residential areas is a generic solution to the housing issue creating more problems than it attempts to resolve, as in the case of Auckland. The submitter stated that would be inadequate parking for multi-level apartment complexes siting that most families have two or more vehicles. The submitter elaborated that if there is only one carpark allocated, the other would be parked on the street which would result in a number of cars on the street if there are apartments.

Haley (70) does not support being part of PC9 stating that it will negatively alter the landscape of Rotorua **Facebook⁴⁵ Feedback was** that PC9 should be reversed as there was no consultation with Rotorua citizens when this decision was made on their behalf. **Drop-in⁴⁶ Session Feedback** was that the implications of Plan Change 9 (PC9) and the Medium Density Residential Standards with respect of the Future Development Strategy needs to be considered and clarified.

6.4 Transport Network

Odim (89) supported the “kaupapa of connectivity” outlined in the FDS and **Kāinga Ora (75)** supported the promotion of transit oriented development and connected centres, and the Integration of landuse and transport planning.

6.4.1 Sub-regional Transport and Corridors

Kāinga Ora (75) argues the FDS should include reference and direction to increasing regional public transport options beyond Rotorua’s urban areas. **Dillion (90)** however stated that in terms of the regional context SH 36 needs major upgrades to sustainably carry existing traffic volumes, ‘let alone’ future traffic volumes triggered by development in Tauriko West (Tauranga). The submitter stated that NZTA/Waka Kotahi preference is for growth along the eastern corridor and SH33 (that is where the upgrades and funding has been directed). In this regard **Waka Kotahi (77)** argues for a reduction in the extent of greenfields growth areas identified around Ngongotahā, and/or a delay in the timing of the release of land from that identified in the FDS as growing Ngongotahā as a commuter suburb of Tauranga/Tauriko Business Estate will necessitate lengthy trips along SH36 which has existing safety issues and there are no current plans for significant improvements.

SmartGrowth (79) outlined that routine commuting between Rotorua and Tauranga⁴⁷ for work should not be encouraged. The submitter would like Council to assess how much and when commuter traffic might be generated, to inform a discussion on the potential management of this impact. The submitter advocates for a shared strategy⁴⁸ for multimodal interregional transport noting that the outcomes sought from this include

⁴⁵ Vegas

⁴⁶ Central Area

⁴⁷ The FDS acknowledges that “[Tauriko] will create a significant employment draw for future residents on the western side of Rotorua.”

⁴⁸ SmartGrowth 2023 will likely promote a transformational shift toward better planning of intra and inter-regional linkages into the Eastern Bay of Plenty, Rotorua and the Waikato. SmartGrowth recently began working with Waikato Futureproof on a shared strategy for multimodal interregional transport.

improved route security, resilience and safety, and reduced congestion, greenhouse gas emissions, and maintenance costs.

6.4.2 Public Transport

Goodwin (51) stated that people need to be able to reach work places via public transport which should be more preferable than using personal vehicles. **Henry (2)** stated that more dense housing needs to be supported by excellent public transport. The **Drop-in⁴⁹ Session Feedback** was that public transport needs to be upgraded and encouraged.

Waka Kotahi (77) supported the intention stated throughout the draft FDS to improve public transport frequency levels. Waka Kotahi however considers that the integration between public transport and urban intensification could come through stronger in the FDS. The Regional Public Transport Plan for instance identifies as a priority action to “Work with partners to ensure public transport is integrated with land use in the Rotorua Future Development Strategy” but spatially there doesn’t appear to be alignment between the FDS and this plan. **Toi Te Ora Public Health (108)** supported the need to develop public transport infrastructure and active modes of transport. The submitter agrees that there should be priority to progress the efficient and effective connection to key routes and centres, as well as iconic and key environmental areas such as Lake Rotorua and the Redwoods. **Student⁵⁰ Workshop Feedback** was that better public transport should be provided with alternative public transport different options considered other than bus

Rotorua Business Chamber (76) in relation to Central Priority Area supported an approach to connect tourism attractions through public transport to entice⁵¹ tourists to stay longer. **Sigma Consultants Ltd (94)** indicated that consideration should be given to mechanisms to provide stronger linkages between the main urban area and the lakes. The submitter outlined that this could include the strengthening of the role of the Redwood Centre in supporting tourist activities and the upgrade of Tarawera Road with consideration of public transport.

6.4.3 Active Transport

Te Arawa Climate Change Working Group (105) supported a transport network specifically in relation to how people can be supported through encouraging active modes such as walking and cycling. The **Drop-in⁵² Session Feedback** was that the notion of a walkable city would be supported. **Sport Bay of Plenty (80)** stated that currently, improving the safety and quality of pedestrian and cycling infrastructure across the network is seen as a key pillar in creating better active transportation options across Rotorua. The submitter also noted that providing safe⁵³ and accessible networks of travel is a key way to ensure more people are active in their transportation. **Odim (89)** stated that new developments and brownfield developments (where possible) should include non-motorised connectivity ‘over and above’ the main road network - i.e. walkways and alleyways between cul-de-sacs and circuitous detours. **Waka Kotahi (77)** argued that historic subdivision

⁴⁹ Eastside Area 2 at Rotorua Lakes High School

⁵⁰ Rotorua Intermediate (Year 7 and 8 students)

⁵¹ According to the submitter: One such example is the Gold Coast of Australia, where a simple North/South tram service connecting to the bus runs with a tap on tap off card payment service has been installed. It has of itself become something of a blueprint for the location of investment and development. The malls, hotels, apartments, tourism promoters, and hospitality business have located themselves adjacent to the tram stops.

⁵² Eastside Area 2 at Rotorua Lakes High School

⁵³ The submitter states that according to a 2021 report from Waka Kotahi New Zealand Transport Agency, just 33% of non-riders say they feel safe cycling on public roads with no cycle lanes. This figure jumps to 60% on public roads with painted cycle lanes, 62% on a shared path or cycle path and 64% on public roads with separated cycle lanes. The latter figure is higher for those who are currently recreational riders (75%) or more committed urban riders (86%).

patterns in Ngongotahā has resulted in development that has limited pedestrian and cycling connectivity, which may be difficult to serve with a highly attractive public transport service. The submitter noted that without quality integrated land use and transport planning, development in this area risks remaining poorly connected and largely car dependent.

6.4.4 Parking

Waka Kotahi (77) supported the development of a Rotorua parking strategy⁵⁴, as described in the draft FDS. The submitter outlined that “Parking management is a vital tool to help our organisations achieve the objectives of the Government Policy Statement on Land Transport, and to enable their organisation’s to realise their urban form, mode shift, and transport emissions reduction goals.”

6.5 Open Space Network (Incl. Sports & Recreation)

Odim (89) stated that green spaces need to be preserved in all suburban areas which doesn't mean all green spaces must remain but a considered approach (as per the recent reserve reallocation) should preserve access to green spaces for everyone. The submitter indicated that although hard to determine from the map, the low lying area on Morey Street is flood prone and therefore could provide a green corridor for the new developments in that area - similar to the Mangakakahi stream reserve, which is an excellent use of low lying land and watershed. The submitter said that the same could be said for any other areas like this. In relation to this point **Te Arawa Climate Change Working Group (105)** emphasised that there is a need to ensure the public open space network aligns with climate change mitigation strategies i.e. using open green spaces to hold water during times of flooding.

Toi Te Ora Public Health (108) stated that it will be advantageous to further reduce car emissions and congestion within the CBD by having additional open/green spaces, pedestrian focused areas rather than only between Eat Street and the Lake. **Sport Bay of Plenty (80)** outlined that currently, 11 fields are deemed as being deficient and the development of Westbrook Sport and Recreation District as well as those at Westbrook Reserve, Ray Boord Park, Smallbone Park, Rotorua International Stadium and Springfield Golf Course have all been identified as potential ways of addressing this identified shortfall. The submitter argues that solutions need to be outlined to address the ongoing growth for both housing and businesses in the context of Play, Active Recreation and Sport (PARS) opportunities. In this regard the submitter stated that there is a need to upgrade and maintain reserve and open space for PARS opportunities and stated that growth across the Westside, Ngongotahā and Eastside districts necessitates upgrades to existing open spaces.

6.6. Health and Wellbeing

Bennett (96) stated that health should be made a consideration in the further development and implementation of the FDS. The submitter supported the concept of a compact city promoted by the FDS rather than lower density sprawling development which has a number of public health risks including lower levels of physical activity, obesity, social isolation and increased car usage - with associated air pollution, climate emissions, and traffic accidents. The submitter argues that Council should consider ‘Healthy Streets’ indicators when designing streets and public spaces. This approach was an initiative by the city of London that aimed to put people and health at the centre of decisions about how public spaces are designed. The submitter emphasised that Council should work with other agencies, and use available levers, to ensure a healthy food

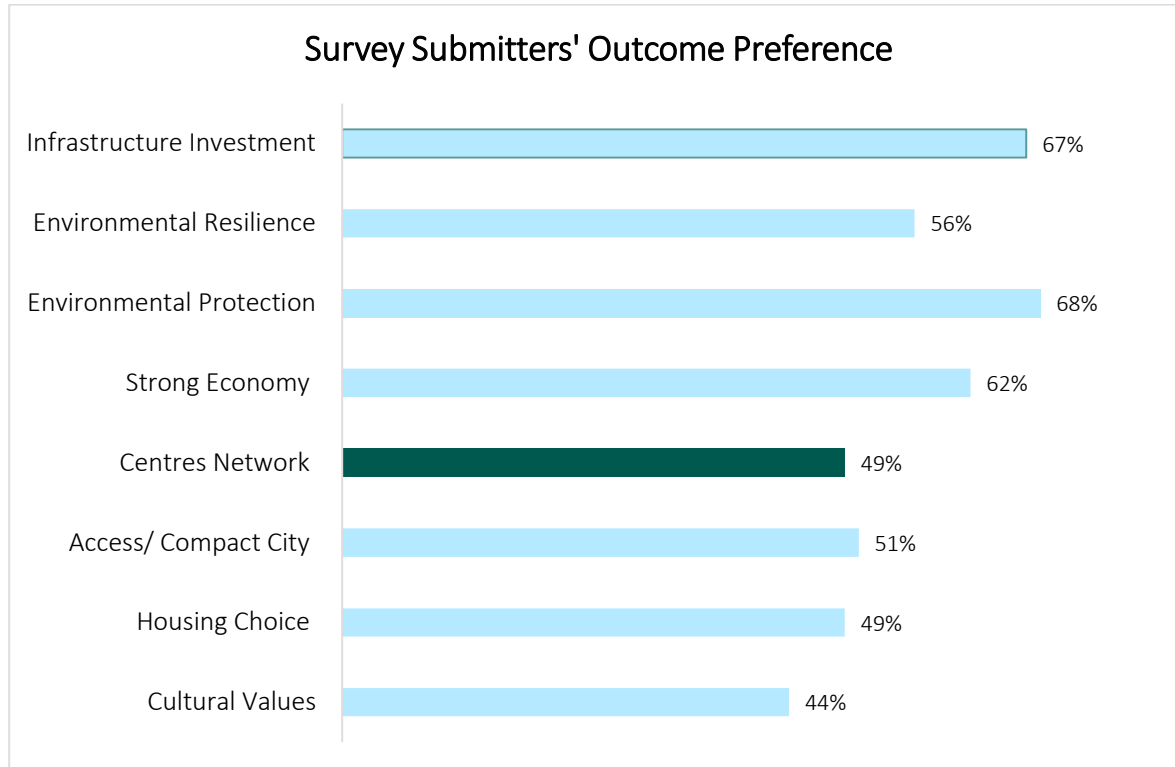
⁵⁴ Waka Kotahi prepared ‘National parking management guidance’ in 2021 and recommends the Council use this to inform the development of the strategy.

environment. **Student⁵⁵ Workshop Feedback was** that exercise machines/facilities should be considered at existing parks to help with both physical and mental health.

⁵⁵ Toi Ohomai Mokoia Campus, Rotorua (carpentry and electrical students)

7.0 Connection – Thriving City Centre Supported By Local Centres

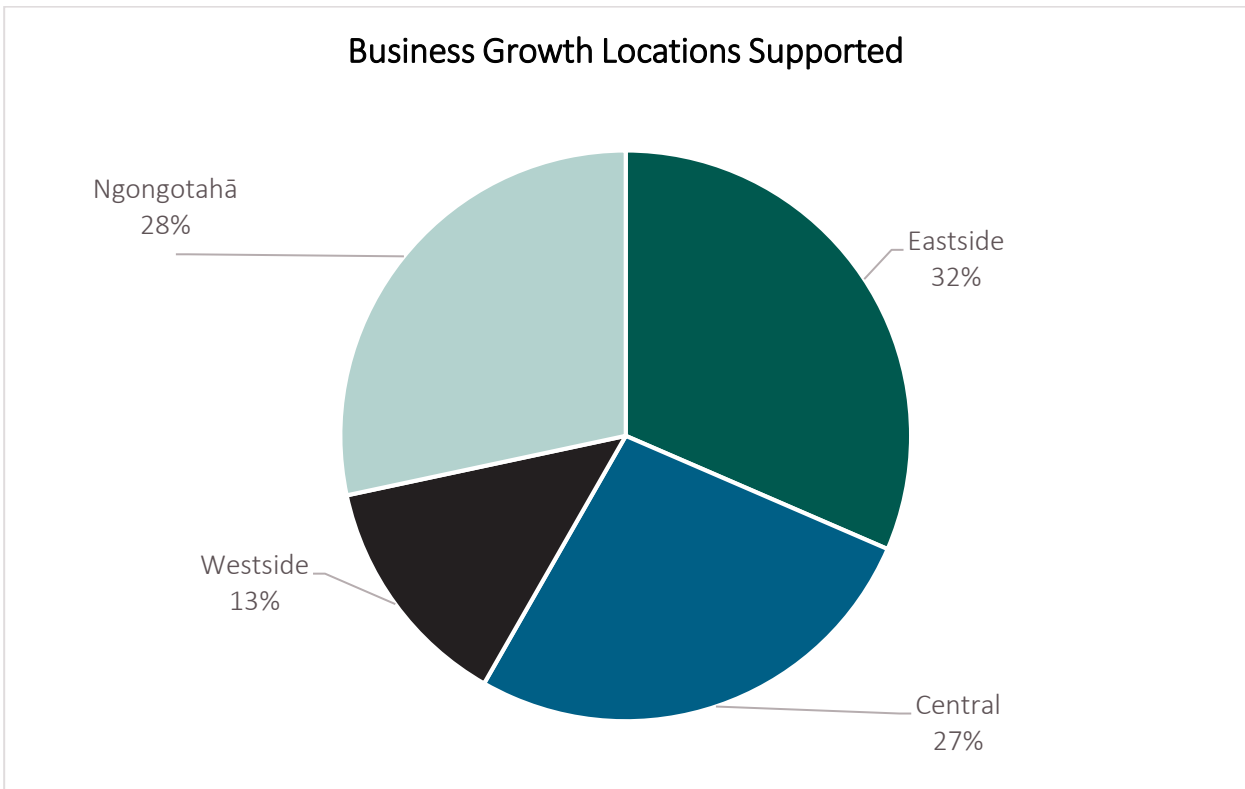
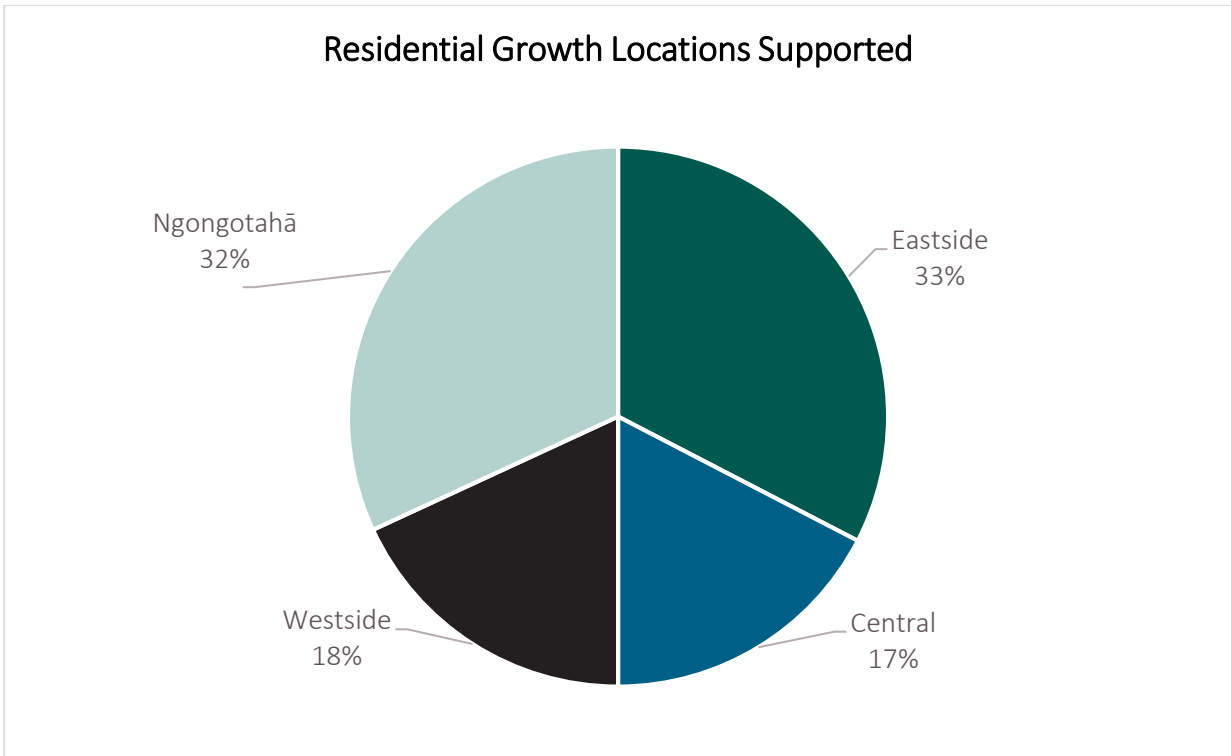
7.1 Support for Outcome



A total of 49% of the online survey submitters⁵⁶ indicated their support for this outcome.

Submitters that completed the online survey submission indicated their support for locations both for residential and business growth. The results are reflected in the following pie charts:

⁵⁶ Two-thirds of the submitters completed the online survey submission



7.2. Response to a Centres-based Approach

The Rotorua Business Chamber (76) and Te Arawa Climate Change Working Group (105) both support the consideration of 'Connection - Thriving City Centre supported by Local Centres.' Sinclair (54) supported residential building alongside areas of Business growth, for ease of access to employment opportunities for our younger people. Odim (89) alternatively advocates for the spreading of development around existing urban and suburban centres. Cleland (102) argues for a focus on Eastside and Ngongotahā to build new houses rather than 'overcrowding' the city centre.

7.3 City Centre and Central Area Growth Considerations

"The city centre is the commercial, retail and cultural heart of Rotorua and will continue to grow and thrive in the future."

7.3.1 City Centre

Nepia (25) asks to "bring back our busy bustling inner city!" indicating that businesses need to be attracted back into town make it a great place to shop and work. Nelson (42) supported the focus of offices in CBD. Odim (89) takes this a step further stating that there should be no new consented retail until "we fill-up the CBD" and other suburban retail areas that are languishing under pressure from all the new big box retail developments, which incidentally appear to be the opposite outcome to 'mode shift and liveable city principles.' Sigma Consultants Ltd (94) argues that there should be a greater focus on measures to revitalize the CBD, and understanding the importance of relationship between the CBD and the adjoining large format retail. Hidden Name H (98) stated land allocated for high density housing must be near services and the town centre.

Sigma Consultants Ltd (94) stated that there appears to be limited emphasis placed on addressing issues in the CBD, specifically struggling retail and how this can be addressed (and recognizing that Council has done some 'fantastic' work in the past, e.g. Eat Street, night markets, SHMPAC. Lakefront etc.), aimed at revitalization. The submitter states that reducing the footprint of the CBD has previously been identified as an important step in creating a vibrant CBD. Mechanisms to achieve this such as rezoning to high density along edges/high amenity areas, could be considered. Equally, the FDS identifies significant areas of business and commercial growth. It is critical that these do not undermine the function of the CBD as the primary retail location.

Turner (17) stated that the City Centre desperately needs a new strategy in order to make it functional. There is a chronic backlog of unoccupied space, particularly on the upper levels. According to the submitter this is a sensible place to incubate new enterprise. Lewis (57) indicated that Rotorua needs to be vibrant with quality businesses in the CBD attracting quality business owners who want to live in Rotorua because of its unique attractions and natural environment. Student⁵⁷ Workshop Feedback was that there is a need to fix the city centre and there was general agreement with the city centre enhancements in the FDS. Iwi⁵⁸ Aspirations Hui Feedback was that there is plenty of business space (vacancies) in the city centre so Council must "stop building more housing until we can support housing with services."

Anonymous⁵⁹ Feedback 1 was that businesses should alternatively be located close to existing business areas in Eastside and Westside. Te Kotahi a Pikiao (3) disagrees that the inner city is 'our' social and economic hub. The submitter stated that his doesn't resonate for rural hapū/ iwi and communities and that from a Ngāti

⁵⁷ John Paul College (Year 11 and 12 students)

⁵⁸ Rural Area (Otaramarae south to Rotomā) Pre-engagement

⁵⁹ Anonymous Survey Submission

Pikiao perspective our marae/ community recreational clubs and the land are their central social and economic hubs.

7.3.2 Broader Central Area

Comments on the approach the broader central area in the context of future growth, are as follows:

Rotorua Business Chamber (76) stated that in relation to the Central Area there should be a ‘simple formulae’ to create connectivity within the central area and lead investment. The submitter stated that there needs to be a ‘blueprint’ or even a schematic plan in the public arena that can guide private investment, to redress the current situation. The submitter noted that there should be an established approach to connect tourism attractions to entice⁶⁰ tourists to stay longer and noted that night entertainment needs to be included in the Central Area’s portfolio of attractions. The submitter outlined that the Central Area needs a plan and that the Chamber is willing to champion⁶¹ the discussion and create a solutions-based approach. The submitter outlined that proposals in the FDS require significant inflows of private investment and that the FDS needs to acknowledge this and that it will come from business people.

Cleave (72) stated that we need more people living in the central city and this will improve inner city opportunities for everyone (shop owners, tourists, locals). **Moore (103)** supported residential growth in the area but only if transport corridors are addressed. **Student⁶² Workshop Feedback** was that there should be high density housing in the central area and the Malfroy Road area should be redeveloped to accommodate higher density housing. **Odim (89)** supported the development of the racecourse for housing and mixed development and **Nelson (42)** indicated that Council should proceed with a sports hub on Springfield golf course.

Lincoln (29) alternatively noted that there should be no growth enabled in the central part of the city, because there are already infrastructure problems like drainage, high traffic volumes at peak hours and much roadside parking outside residential addresses here. The submitter stated that as in the case of Auckland there is too much concrete and not enough pervious surfaces to absorb run off from rain. The submitter advocates for the creation of more new subdivisions as in the case of Hamilton, Tauranga and South Auckland on the periphery rather than intensifying the central areas and overload infrastructure.

7.3 Ōwhata and Eastside

“The Te Ngae Shopping Centre and its surrounds in Ōwhata will need to grow and diversify over time to support a growing residential population and employment base on the Eastside “

⁶⁰ According to the submitter: One such example is the Gold Coast of Australia, where a simple North/South tram service connecting to the bus runs with a tap on tap card payment service has been installed. It has of itself become something of a blueprint for the location of investment and development. The malls, hotels, apartments, tourism promoters, and hospitality business have located themselves adjacent to the tram stops.

⁶¹ The Chamber represents over 90% of the ‘business mass’ in Rotorua as measured by employment.

⁶² Toi Ohomai Mokoia Campus, Rotorua (carpentry and electrical students)

7.3.1 Ōwhata and the Te Ngae Shopping Centre

The **Rotorua Business Chamber (76)** supported the positioning of Eastside as evolving into a ‘satellite’ centre. **Student⁶³ Workshop Feedback** was that the FDS proposed centre enhancements proposed in the FDS is supported due to the accessibility of the location “to everything they need.” **Nelson (42)** however indicated that there needs to be some pragmatism in relation to growth nodes around the existing centres. The submitter goes on to state that the Eastside node (around Te Ngae Shopping Centre) is probably the weakest in terms of a shopping hub to build around. **Sigma Consultants Ltd (94)** takes a stronger view and in relation to secondary centres indicated that the identification of the Te Ngae Shopping Centre as a secondary centre should be delayed to coincide with longer term rezoning of residential and business land in the vicinity. The submitter stated that this would provide the opportunity to consider the redevelopment of the site in terms public transport linkages, and the integration of residential and retail activities. The submitter outlined that there should be a focus on measures to strengthen linkages between the main urban area and the Lakes.

7.3.2 The Broader Eastside Area

Comments on the approach to Eastside in the context of future growth, are as follows:

Ōwhata Kōhanga Rākau Housing Limited Partnership (84) supported the identification of Eastside as a priority growth area for future housing in Rotorua. The submitter stated that the recognition of Eastside as a priority development area is in relation to its potential for supporting new mixed use residential communities; provision for urban development opportunities on whenua Māori, including in Eastside, for new and intensified housing and business activities, as a means to achieve the outcomes of the draft FDS and support economic development for iwi and hapū. The submitter stated that further recognition is in relation to providing housing choices to meet the diverse needs of the existing and future community, by enabling greater opportunities for intensification to occur in the urban area and identifying a range of opportunities for large scale future greenfield development in Eastside.

Student⁶⁴ Workshop Feedback on providing for growth in Eastside was as follows: provision should be made for apartments around Fairbank/Gee road; rural homes should be provided for out towards the airport and Wharenui Rise is supported as a growth area. **Rotorua Business Chamber (76)** supported further Greenfield development at Wharenui. **Kāinga Ora (75)** stated that while they support growth in Ōwhata (Map 11 of the FDS) there are current zoning and planning constraints limiting growth and residential development enablement- with part of the land zoned for rural residential. The submitter highlighted that zoning of the land, and infrastructure delivery will need to be coordinated in the short term to avoid adhoc subdivision/ housing development in this area.

7.3 The Ngongotahā Centre and Ngongotahā

“the centre will need to grow and diversify over time to support a growing population”

7.3.1 Ngongotahā Centre

Rotorua Business Chamber (76) supported the positioning Ngongotahā as a ‘future development centre.’ **The Good Grocer (87)** supported the provision of business land for future growth and/or a re-imagining of the town

⁶³ Toi Ohomai Mokoia Campus, Rotorua (carpentry and electrical students)

⁶⁴ Toi Ohomai Mokoia Campus, Rotorua (carpentry and electrical students)

centre. **Cleave (72)** stated that Ngongotahā's "old industry" is better suited to business growth than to residential growth. **Iwi⁶⁵ Aspirations Hui Feedback** was that Ngongotahā has the potential to be "an amazing little town." It was stated by the community that it is an attractive town but qualitative changes are needed to enhance the town. It was further emphasised that there were more places for community to meet in the past and that car culture has affected the environment in a negative way. **Drop-in⁶⁶ Session Feedback** was that ensuring vibrancy of 'the Village,' as growth is experienced, is an important consideration. **Sigma Consultants Ltd (94)** emphasised that maximizing lake views and access to the lake is important for Ngongotahā. **Wharekura (66)** argues that Ngongotahā hasn't had the investment that has been observed out at Eastside, Westside and all the lakes in recent years.

7.3.2 Broader Ngongotahā Area

Comments on the approach to the broader Ngongotahā are in the context of future growth, are as follows:

Student⁶⁷ Workshop Feedback was that there is support for the potential new rural lifestyle development are proposed in the FDS as more houses are needed in this area of Ngongotahā. It was emphasised that additional housing in general is needed in Ngongotahā. The proposed new residential areas in proximity to Leonard road was also supported. The students also supported the development of apartments and small businesses (like a dairy) near Hamurana Road. **Moore (103)** supported residential growth in Ngongotahā but only if transport corridors are addressed.

Drop-in⁶⁸ Session Feedback was that the need for a sport/recreation reserve somewhere within Ngongotahā is supported but would need community input as to where this should be located. **Iwi⁶⁹ Aspirations Hui Feedback** was that there is a concern as to whether the Ngongotahā a medical centre and schools can cope with growth of additional households proposed through the FDS. **Drop-in⁷⁰ Session Feedback** was that the up-zoning of Brake Road future development areas to rural residential and residential was a concern in relation to its feasibility for development given landscape constraints. There was also discussion amongst the attendees about the proposed flood mitigation works with respect to the Stemberge Road growth area proposed in the FDS. They attendees noted that the proposed works will likely limit the level of future development.

Tura Ngakau me Ngāti Whakaue ki Ngongotahā (95) stated that additional housing needs to go hand-in-hand with providing employment land. The submitter indicated that additional industrial and commercial land needs to be provided to allow for businesses to grow or new businesses to establish in Rotorua in the short to medium term. **Hampson (4)** however outlined that Ngongotahā is not an ideal growth area as it is too far out of town for residents that don't have transport to town and supermarkets. The submitter stated that traveling into town now is currently an issue "so how will they cope with all the additional houses." **Cole (48)** further stated that there isn't the infrastructure to support an influx of people to Ngongotahā e.g. lack of schooling, medical facilities and traffic is already congested leading in and out of Ngongotahā.

⁶⁵ Central Area (Ngongotahā to the Puarenga Stream) Pre-engagement

⁶⁶ Ngongotahā

⁶⁷ Toi Ohomai Mokoia Campus, Rotorua (carpentry and electrical students)

⁶⁸ Ngongotahā

⁶⁹ Central Area (Ngongotahā to the Puarenga Stream) Pre-engagement

⁷⁰ Ngongotahā

7.4 Westside

Comments on the approach to Westside are in the context of future growth, are as follows:

Summerset Group Holdings Limited (88) stated that the draft FDS appropriately identifies Westside as both a priority development and new growth area to realise further residential capacity in the form of medium-density neighbourhoods in the short to medium term. **Student⁷¹ Workshop Feedback** was that they support more houses in Westside. **Moore (103)** supported residential growth but only if transport corridors are addressed. **Sigma Consultants (94)** questioned if the ground conditions and flood risk had been assessed for the Bonnington Farm (land north of Aquarius Drive). **Drop-in⁷² Session Feedback** was whether infrastructure upgrades were proposed for Fairy Springs to support more housing?

7.5 High Density Corridors (to support residential development)

Student⁷³ Workshop Feedback was that the hotels on Fenton should be converted into apartments. The students expressed their support for high density residential development on Fenton Street. Some students however felt that the hotels and motels should remain so that the corridor retains its holiday town feel. **Stewart (26)** indicated that it is important to tidy Fenton Street now and noted that landscaping would go a long way to make the foot paths more attractive.

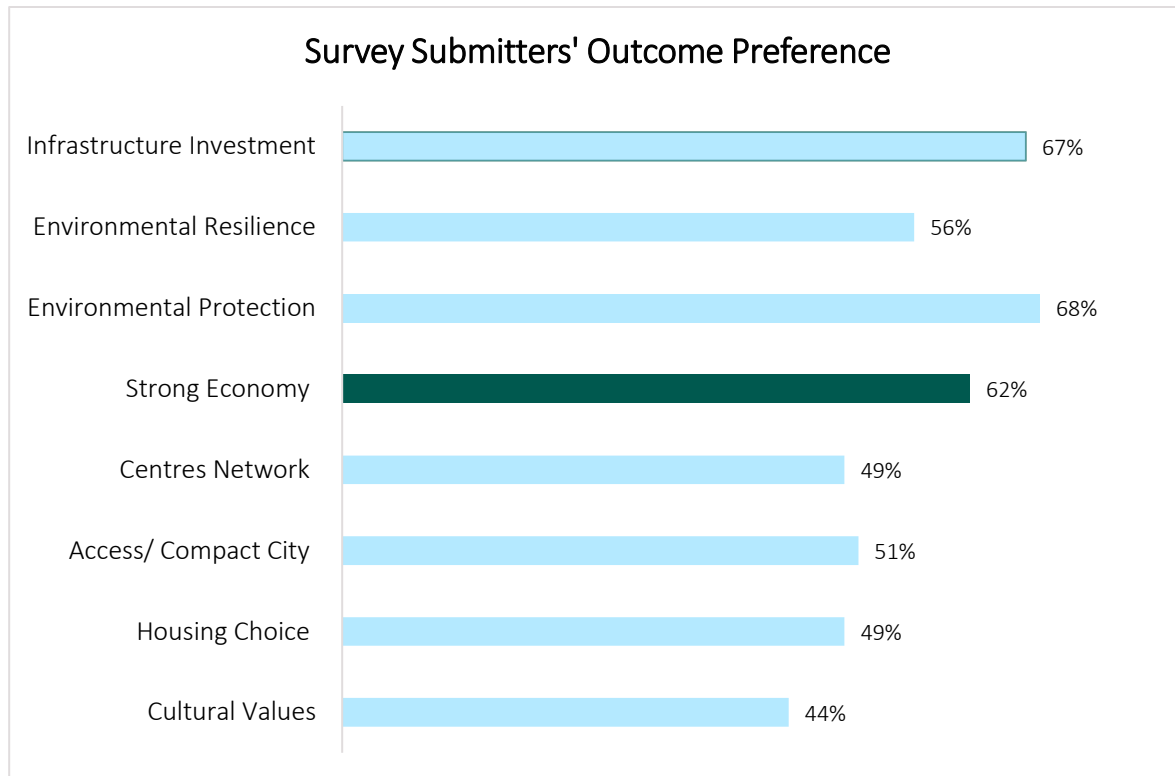
⁷¹ Toi Ohomai Mokoia Campus, Rotorua (carpentry and electrical students)

⁷² Central Area

⁷³ Toi Ohomai Mokoia Campus, Rotorua (carpentry and electrical students)

8.0 Prosperity – A Strong Economy

8.1 Support for Outcome



A total of 62% of the online survey submitters⁷⁴ indicated their support for this outcome

8.2 Providing Certainty to Business and for a Strong Economy

The Good Grocer (87) indicated that the certainty provided by the FDS is essential to the long term planning required for business and is an absolute necessity when considering such things as asset management (influencing maintenance/renewal plans). The submitter goes on to note that it influences decision making with regards to such things as “the retailer’s provision of food and other consumer goods, the employment, training and upskilling of community members, its contribution to charity and philanthropy and the growth of its products and services.”

8.3 The Youth on Rotorua’s Economic Future

A cross section of Rotorua’s youth provided a perspective on what is important to them in relation to Rotorua’s economic future in a series of workshops concerning the FDS. A high-level summary of their Feedback is provided below:

⁷⁴ Two-thirds of the submitters completed the online survey submission

Student⁷⁵ Workshop Feedback was provided in relation to what makes Rotorua a great place to live? The students indicated that culture, friendly people, the welcoming community, lakes in the summer and its tourist attractions makes Rotorua a great place. Further **Student⁷⁶ Workshop Feedback** was that the central location makes Rotorua a great place to be located. Tourism is therefore envisaged as a key sector for Rotorua's future according to the students.

Further **Student⁷⁷ Workshop Feedback** on what is important to them in a future Rotorua was that they hope that there is: enough jobs (especially for locals), a bigger international airport, a bigger central mall and shops; mini mall in Ngongotahā; hotels and motels, more food places and more festivals. Further **Student⁷⁸ Workshop Feedback** was to retain the tourist attractions, provide more shops in Ngongotahā (e.g. clothing and food stores, a supermarket and McDonalds). Some more **Student⁷⁹ Workshop Feedback** was the need for more fast food restaurants and service stations.

8.4 Business and Corridors

SmartGrowth (79) Recognises the wider regional context in which growth occurs, including the inter-connection of Rotorua with Tauranga and the western Bay of Plenty (including SH33 being the main freight route from Rotorua to the Port of Tauranga, and the proximity of current and planned business areas creating a potential employment draw for Rotorua residents). **Kāinga Ora (75)** requests that references to State Highway (SH)36- an important freight route for the Port of Tauranga and SH5- a key route for supporting Waikato industries (not only tourism) are included in the 'Regional Context Section.' **Lewis (57)** supported industrial businesses being relocated to the corridors out of the city, and also to the south. **Dillion (90)** argues that industrial expansion should be focused on the SH5 on route to Hamilton, to benefit from the improved travel times and 'greater accessibility' provided by the Waikato Expressway.

Rotorua Business Chamber (76) noted that **heavy traffic** to the Port will be in conflict with medium density residential proposals along SH30/Te Ngae Road. **Red Stag (85)** requests that the logistics of the Waipā Mill and access to tourism and commercial infrastructure, is the maintained access from SH5 for Waipā State Mill Road. This submitter argues that access way needs to be maintained (or improved) as traffic flows increase. The "Tourism Gateway" and "Key Freight" Corridor is becoming more developed and industry is moving to the Peka Block Industrial Park.

Iwi⁸⁰ Aspirations Hui Feedback was that SH30 (from the east) is a key gateway to Rotorua and that there is a need to improve this entrance, so it is attractive. Instead, the community feel that it has become a 'dumping ground' for those passing through the community. The community have great aspirations for Mourea and amongst other things would like to see it as a beautiful gateway to Rotorua; for the community to reflect the people and for the culture to be celebrated and showcased.

⁷⁵ Rotorua Boys High School (Year 12 and 13 students)

⁷⁶ Rotorua Intermediate (Year 7 and 8 students)

⁷⁷ Rotorua Boys High School (Year 12 and 13 students)

⁷⁸ Rotorua Intermediate (Year 7 and 8 students)

⁷⁹ John Paul College (Year 11 and 12 students)

⁸⁰ Rural Area (Otaramarae south to Rotomā) Pre-engagement

8.5 Proposed Business Opportunities

8.5.1 Ngongotahā

Quinn (38) stated that Ngongotahā has excellent road access, established light to heavy industrial businesses with minimal impact on residential properties. **Rotorua Business Chamber (76)** indicated that to achieve the level of growth (proposed in the FDS) for Ngongotahā the following will require:

- Provision for a modern shopping mall at Ngongotahā.
- Careful location of business, industrial, and tourism activities along the main access thoroughfare that flows toward the city's North/West entrance.
- Finding a solution to the contaminated land at the old mill site.

The submitter adds that as a semi-rural 'satellite' centre, Ngongotahā is ideally located for tourism (focused on the agriculture/outdoors type of activities)

Student⁸¹ Workshop Feedback was to enhance the commercial shopping area in Ngongotahā. The students indicated that old stores should be replaced with a new plaza with more shops, food outlets, healthcare facilities, more car parks and more accommodation (backpackers). **Wharekura (66)** stated that it is important to enable businesses that support and enhance the local community. In this regard it was asked "how did the wreckers on Tauī St get consent to operate less than 400m from the lake?" The submitter further stated that whole of the ex Fletchers block "is an 'eye-sore.'"

8.5.2 Southern extent of Ngongotahā (intersection of State Highway 5 and 36)

The Good Grocer (87) supported the additional business development land proposed for at the corner of Stenbridge and Ngongotahā Roads. **Sigma Consultants Ltd (94)** noted that the overall concept for the future development of Ngongotahā is broadly supported, however, a key component of this appears to be moving Industrial on the western side of Wikaraka Street south towards SH5. The submitter stated that the maps were unclear on where this would exactly be as they refer generally to business areas but there is a lack of clarity about the intention. The submitter went on to state that historical uses of the industrial land along Wikaraka Street may have resulted in soil contamination. Investigations into the feasibility of conversion would be an important early assessment as this land as it is close to the centre of Ngongotahā and would contribute positively to the future amenity of the community. The submitter also noted that the location of new Industrial zoning is important in terms of the entranceway concept, along with controls around appearance.

8.5.3 Expansion of recreational and tourist activities (south-western side of State Highway 5)

Waka Kotahi (77) supported the use of the tourism focussed business land on SH5, in keeping with the uses already operating in that area **Wylie (21)** indicated that business is positive for the economy as long as it complements the surrounding area. The submitter mentioned that where she lives are a few tourist attractions, so it makes sense to enable businesses to locate there that would complement the surrounding businesses. **Rotorua Business Chamber (76)** supports business, industrial, and tourism activities along the main access thoroughfare (SH5) that flows toward the city's North/West entrance, but it needs to be carefully located.

⁸¹ Toi Ohomai Mokoia Campus, Rotorua (carpentry and electrical students)

8.5.4 Eastside

Skilling (39) stated that Eastside already has well used business growth areas and is close to the airport and offers easy access to the airport and to the port in Tauranga. **Save Glenholme (50)** and **Nelson (42)** indicated support for an industrial hub in the outskirts of the city close to Rotorua Airport. **Quinn (38)** noted that Eastside has excellent road access, established light to heavy industrial industry with minimal impact on residential properties. The **Student⁸² Workshop Feedback** was that industrial businesses should be around Wharenui rise to provide an employment base for the proposed residential growth and to create less traffic along Te Ngae road.

8.5.5 Business land on the Eastside close to the Rotorua Airport and Eastgate Business Park

The **Rotorua Business Chamber (76)** supported light industrial development opposite the airport and north east toward Tikitere. **Dillion (90)** cautioned that in terms of business and capacity- The National Policy Statement-Highly Productive Land (NPS-HPL) potentially renders this area off limits, therefore requiring the identification of additional areas of business land. **Carr (52)** outlined that Eastside already has an industrial area and that it has taken 20 years for it to fill. The submitter disagrees with the area proposed through the FDS and asks what was wrong with the Eastern Basin Plan⁸³ (EBP). **Turner (17)** and **Birt (36)** are also opposed to the potential new business land identified to the East of SH30 for the long term. **Turner (17)** states that if the Proposed EBP were adopted instead, the long-term commercial development needs of the area would be met, in addition to the servicing the Rotorua Airport's needs.

8.5.6 Westside

Quinn (38) states that Westside has excellent road access, established light to heavy industrial industry with minimal impact on residential properties.

8.6 Incentivising Business (Industrial) Relocation

Waka Kotahi (77) supported the plans for business land/employment uses, including the relocation of some existing business areas to new locations. The submitter pointed out that generally, these changing land use patterns will be beneficial from a transport and land use perspective. **Pene (20)**, as an associate to the Ngāpuna community via Hinemihi Marae, applauds the intention of encouraging industries to leave the area and re-establish elsewhere. **Drop-in⁸⁴ Session Feedback** was that there was general support and consensus for incentivising the relocation of industrial activities out of Ngongotahā. **Iwi⁸⁵ Aspirations Hui Feedback** was that the proposed future re-zoning of the land in this location from industrial to commercial is not the community's aspiration. The aspiration is for this area would be for to be zoned residential and that contamination issues concerning the land would be looked into.

⁸² Toi Ohomai Mokoia Campus, Rotorua (carpentry and electrical students)

⁸³ [Rotorua Basin Structure Plan - REPORT - VOLUME 2, TECHNICAL INFORMATION Prepared for Rotorua District Council \(readkong.com\)](#)

⁸⁴ Ngongotahā

⁸⁵ Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

Rotorua Business Chamber (76) stated that incentivising the relocation of industrial activity from Fairy Springs Road to SH30 Peka area, has merit and is supported. **Red Stag (85)** noted that the ‘corridor planning detail’ in the Stantec “Peka Block and Red Stag Timber Access Optioneering Assessment” 2022 to be accepted into the FDS to provide a clear Plan for the “Tourism Gateway”⁸⁶, securing ongoing safe access for road users, without disruption to industrial operations. The study identified a preferred strategic access agreement for the new Peka Block Industrial Estate (made up of relocating industry from Fairy Springs and Ngāpuna) and Waipā State Mill Road.

8.7 Consideration of Economic Sectors

Rotorua Business Chamber (76) outlined that there should be a clear relationship between the FDS and the primary drivers⁸⁶ that “feed and fund the city” (particularly considering the challenges they face and the support they need). **Rotorua/ Taupō Federated Farmers of New Zealand (82)** stated that there needs to be recognition of farming in the FDS and its key role in Rotorua’s economy. The submitter stated that farming⁸⁷ plays a significant⁸⁸ role in shaping the economic environment of the District. According to the submitter Council must strategise growth in a way that recognises the impact of urban development on rural land. The submitter outlines that the FDS does not provide an equal analysis⁸⁹ of the constraints and opportunities for the farming sector and there needs to be sufficient recognition for the interests of the rural sector recognising its prominent place in Rotorua’s economy.

Sigma Consultants Ltd (94) stated that greater recognition needs to be given to the importance of tourism to the Rotorua economy, and ensuring this is integrated with future planning. The submitter noted that the maps for Central, Eastside, Western and Ngongotahā should include key tourist routes, both into and out of the city, and also through the city out to the Lakes and the tourist gateways. The submitter noted that the location of future tourist accommodation should be actively managed as it is essential to ensure it is occurring in the right locations with respect to appropriate amenity (in this regard the redevelopment of Fenton Street as a tourist entranceway needs to be incentivised). The submitter further noted that in the Rotorua context a well-functioning urban environments must recognise and provide for tourism given its impact on the economy.

8.8 Impact on Business and Employment

Pickering (33) advocated for no residential growth on any farmland, reserve land or any currently undeveloped land irrespective of who owns it. **Rotorua/ Taupō Federated Farmers of New Zealand (82)** outlined that farmland needs to be protected from reverse sensitivity effects of urban development to ensure routine work on farms can continue unimpeded. The submitter emphasised that new residential and commercial growth may be incompatible with existing land use activities, effects, and perceptions of the natural character of the rural area. This incompatibility in or near rural areas is a concern, as existing land uses for primary production are vulnerable to complaints from newly established activities resulting in negative consequences for the existing land use. The submitter therefore noted that there is a need to minimise the potential for reverse sensitivity effects so farmers can have certainty that their farms can continue to operate with minimal interference from other activities.

⁸⁶ According to the submitter: Forestry (and forest feeder industries), Tourism (and tourism related businesses) and Farming (and land-based feeder industries)

⁸⁷ According to the submitter: Most agricultural land in Rotorua is used for dairy, sheep, beef, and deer farming.

⁸⁸ According to the submitter: This is recognised after all in the fact that farmland makes a contribution to Council’s targeted rate for Business and Economic Development. For our farms to operate, develop and innovate, land and resources need to be both available and free from unreasonable restrictions.

⁸⁹ According to the submitter: The FDS identifies opportunities and constraints for residential and commercial business because these are needed to grow Rotorua.

The submitter also stated the rating impacts⁹⁰ of urban development needs to be recognised, emphasising that the rating system should be based on the actual use of the land rather than the potential use of land. According to the submitter it should reflect the services including the levels of those services that are reasonably available to rural ratepayers. As Council prepares their LTP, Federated Farmers encourages Council to mitigate the rating impacts on rural land arising from urban development.

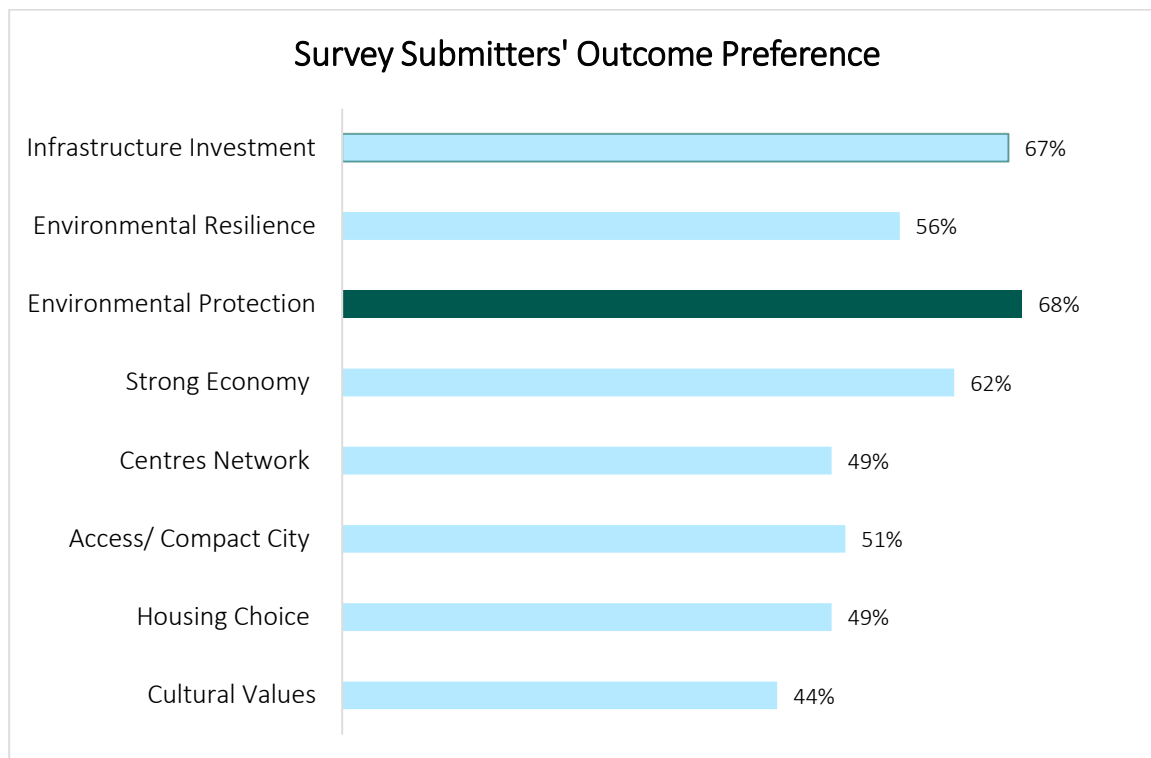
Cordero (61) stated that he hopes “we can make Rotorua safer so we could attract more business and more tourism.” **Wharekura (66)** on however argued that Rotorua needs ‘other industry’ to create jobs and that we should not have such a huge reliance on tourism. The submitter stated that when Covid came the tourism industry shut down, but the forestry and agriculture industries continued. **Rotorua Business Chamber (76)** outlined that there should be a clear direction on work to address unemployment and the ability for businesses to secure ‘good’ staff. **Iwi⁹¹ Aspirations Hui Feedback** was that the community would like a good understanding of future employment opportunities so they are able to guide their mokopuna, so they can be both educated and ready for change.

⁹⁰ According to the submitter: The issue arises due to the significant cost based on the substantial increase in rates due to the subdivision potential of the land. This produces tension as it affects the viability of the farm potentially driving farmers out of the business.

⁹¹ Southern Area (Whakarewarewa to Reporoa) Pre-Engagement

9.0 Environment – Protection and Enhancement

9.1 Support for Outcome



A total of 68% of the online survey submitters⁹² indicated their support for this outcome.

9.2 The Natural Environment

Iwi⁹³ Aspirations Hui Feedback was that the natural environment should be a top priority for Council. **Goodwin (51)** emphasised that the natural environment, parks, gardens, natural bush and wetlands are important for everyone's wellbeing. **Te Arawa Climate Change Working Group (105)** supports the consideration of 'Protect the Taiao' which involves the prioritising of the protection and enhancement of our natural environment as development occurs through the use of green infrastructure to restore the mauri of our lands, wai, taonga species, indigenous ecosystems and protect our mahinga kai, rauemi and cultural landscapes within RLC urban and district development planning and RLC policy documents. The submitter outlined that careful consideration needs to be given to what te taiao can sustain. For example, developments must not occur in areas that will create further flooding through overburdening of stormwater systems or impact further on wetlands and riparian zones etc.

Wylie (21) expressed concern that "we are going to overcrowd our city" and have a burden on our environment (lakes, forests) etc. **Gielen (7)** stated that "the wellbeing of our local Natural Earth world is connected to the wellbeing of the people whom dwell there." The submitter then stressed that the community's ability to sustain a healthy connection to their world will be detrimentally affected by crowding in multi-storey spaces.

⁹² Two-thirds of the submitters completed the online survey submission

⁹³ Rural Area (Otaramarae south to Rotomā) Pre-engagement

Lamb (22) outlined that the health of our natural environment is strongly linked to a thriving economy and stressed that action is taken so that we can have not only a resilient economy, but also so the health of our people is resilient and strong.

Student⁹⁴ Workshop Feedback in relation to “What makes Rotorua a great place to live?” was views of the lakes and swimming spots and in relation to “What is important to you in a future Rotorua?” the students indicated nature, ensuring the awa is clean and that there were tidy waterways. Further **Student⁹⁵ Workshop Feedback** was that the lakes, Redwoods and views are important. Students indicated that they value the environment and the ‘we need more trees’ (and should hence not cut them down). **Student⁹⁶ Workshop Feedback** was also that although the city will be expanded through the FDS they hope we ensure that ‘nature’ remains untouched.

9.3 Pest and Weed Management

Smith (56) noted that on the Eastside more thought needs be given to the negative effects of development on bird life connecting for example to mokoia i.e. Lee Road Reserve could receive native planting to support bird populations. **Goodwin (51)** outlined that animal and weed pest control also needs to happen and that Council needs to be prepared to support groups in this kaupapa. The submitter further noted that the natural environment, parks, gardens, natural bush and wetlands are also important for everyone’s wellbeing. **Facebook⁹⁷ Feedback was that Council** was that Council must not forget about the natural green environment along with weed and animal pest control. Council must also not leave this to volunteer groups (with limited support) and Bay of Plenty Regional Council only.

9. 4 Impact of Development

Smith (56) claimed that business growth needs to be done in an environmentally friendly/ sensitive and visually appealing way. **Iwi⁹⁸ Aspirations Hui Feedback** also emphasised that the future location of industry needs to be very carefully considered and priority needs to be given to protecting both the local communities and the environment. **Ngapapa (19)** argued that commercial businesses need to focus on areas out of urban suburbs due to the damage they are causing the environment. For example pollution leaching into the natural thermal springs. **Iwi⁹⁹ Aspirations Hui Feedback** was that the people and the environment are suffering greatly due to the long history of industry in their community (Ngāpuna) that has played out in a negative way. The community have been giving feedback on these issues for decades but nothing seems to have happened and they want to express that they are at a point where this is becoming ‘psychologically damaging’ to them. **Smith (56)** emphasised that the reserves needed to not only be kept but also enhanced with native planting. The submitter stated that housing intensification needs to be done in a way that maintains the natural environment spaces and sunlight and that consideration needs to be given to the impacts on natural spaces i.e. lakes, streams

⁹⁴ Rotorua Boys High School (Year 12 and 13 students)

⁹⁵ Rotorua Intermediate (Year 7 and 8 students)

⁹⁶ John Paul College (Year 11 and 12 students)

⁹⁷ Goodwin

⁹⁸ Rural Area (Otaramarae south to Rotomā) Pre-engagement

⁹⁹ Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

9.5 Water

9.5.1 Water Resource and Catchment Implications

Iwi¹⁰⁰ Aspirations Hui Feedback was that “if we are anticipating another 10,000 jobs and homes how are we planning for this and its impact on the Lakes/ freshwater?” **Dillion (90)** noted that the effect of the proposed urbanisation and intensification within the Lake Rotorua catchment needs to be much better understood before the finalisation of the FDS. The submitter notes that it could be the case that the effects of such changes are so significant and cannot be mitigated that an alternative and a more benign pattern of development is pursued. The submitter stressed that the health of Lake Rotorua should be the starting point and ‘lodestar’ for examining future urban development for Rotorua.

Lakes Water Quality Society (LWQS) (81) urged that greater consideration needs to be given to the management of water resources and biodiversity. The submitter pointed out that this relates to considerable concern that any future development, expansion, and intensification in urban, commercial, and industrial areas will have significant impacts on Lake Rotorua and its associated stream water quality and quantity. The submitter indicated that it would be important to consider the surrounding catchments and the interrelationship between the catchments and the type and level of future development. The submitter then emphasised that the strategy must provide more in-depth assessment of how the proposed increase in 14,400 people along with increases in business and industrial activity are going to be managed to ensure that the restoration¹⁰¹ of the lakes will continue and be further enhanced.

Te Arawa Climate Change Working Group (105) emphasised that the FDS needs to ensure existing and future residential, commercial and industrial development is located away from all water sources and water ways to protect¹⁰² Te Mauri me te Mana o Te Wai. The submitter stated further that this needs to include a long-term strategy of managed retreat to buy back residential, commercial and industrial land that borders waterways to convert back to planted cover. The submitter argued that the FDS must also prioritise Te Mauri me te Mana o Te Wai and the intergenerational wellbeing of communities in all decision-making to ensure the protection and restoration of our water and kaimoana sources including our puna, rivers, lakes and tributaries.

9.5.2 Water Quality (and Nutrient Management)

Sigma Consultants Ltd (94) noted that Lake Water Quality was identified through the document but given the importance of the issue does not appear to have sufficient focus. **Moore (103)** outlined that consideration must be given to the diversion of streams (with small trout friendly weirs) to reduce nutrients following into the Lake. The submitter noted that modern technology can result in very low nutrient levels in the water. **Iwi¹⁰³ Aspirations Hui Feedback** was that the Lake is extremely polluted with waste from industry. The community stated that the area is so polluted, that the land cannot sustain the people, to collect kai, drink water and safely

¹⁰⁰ Southern Area (Whakarewarewa to Reporoa) Pre-engagement

¹⁰¹ According to the submitter: This is a fundamental commitment to the community and this outcome has received substantial locally sourced funding over the last 20 years.

¹⁰² According to the submitter: Te Arawa collective aspirations are for a biophyllic, water-sensitive Rotorua city and surrounds as identified and prioritised within Te Ara ki Kōpū: Te Arawa Climate Change Strategy. The Rotorua lakes catchment and Te Arawa ki Tai region (central north island – Waiariki and Taupō/ Turangi) generally is one of the highest concentration of ture whenua Māori land of any area within Aotearoa.

¹⁰³ Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

swim. **Facebook¹⁰⁴ Feedback** was that the pollution of the Puarenga stream and Te Arikioa the Ngāpuna side of Lake Rotorua still hasn't been addressed.

Rotorua/ Taupō Federated Farmers of New Zealand (82) stated that consideration must be given to the impact of urban development on farmers and strategies need to be developed to balance urban growth with the viability of farming. The submitter emphasises that careful planning that recognises and provides for agriculture's dependence on the availability of natural resources¹⁰⁵ needs to be undertaken. The submitter urged that Council consult with landowners when offsetting measures for urban development are explored. The submitter pointed out that territorial authorities are limited by resource consents they hold for resources such as water takes and discharges. They argue that Council needs put more emphasis on ensuring that growth occurs in the right place at the right time to minimise restrictions on existing and future farming practices.

Iwi¹⁰⁶ Aspirations Hui Feedback was that the odour produced from the wastewater treatment plant indicates that there may be environmental issues associated with it. **Iwi¹⁰⁷ Aspirations Hui Feedback** was that alternative methods for wastewater treatment needs to be considered going into the future, considering the capacity issues associated with the waste water treatment plant. **Te Arawa Climate Change Working Group (105)** stated that the FDS must also prioritise the upgrade to the Rotorua wastewater treatment plant that is currently underway and prioritise the exploration, costing and funding of off-setting measures to address anticipated issues in the future of the wastewater treatment plant.

9.5.4 Water Quantity

Te Arawa Climate Change Working Group (105) noted that waterways and wetlands are prioritised¹⁰⁸ in the planning associated with the FDS, considering that there will be thousands of new homes. **Te Arawa Climate Change Working Group (105)** outlined that the FDS prioritise policy requiring biophilic, water-sensitive design including on-site water reuse across all new developments; and the staged retrofitting of biophilic, water-sensitive design including on-site water reuse across existing buildings within the Rotorua district.

9.6 Impact on Human Health

Iwi¹⁰⁹ Aspirations Hui Feedback was that there is a cost that comes with growth and this cost is associated with people's health. **Toi Te Ora Public Health (108)** emphasised that they are supportive of the FDS recognising the importance of water quality as it is a key issue that relates to many health outcomes. **Iwi¹¹⁰ Aspirations Hui Feedback** was that pollution in relation to smell, dust, noise, vibration from trucks is something that community has to live with every day. The community emphasised that this is not healthy for future generations. The community indicated that they are getting sick and stated that 'The Mill' produces an odour, causes damage to the environment and the health of the people is deteriorating.

¹⁰⁴ Mutu

¹⁰⁵ According to the submitter: Natural resources are limited. Land and water are of particular importance to the farming community.

¹⁰⁶ Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

¹⁰⁷ Southern Area (Whakarewarewa to Reporoa) Pre-engagement

¹⁰⁸ According to the submitter: "How is RLC going to protect our lake Te Rotorua-nui-ā-Kahumatamomoe our roto has been treated like a septic tank for too long? Te Arawa will no longer stand by and allow our wai to be sacrificed to development"

¹⁰⁹ Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

¹¹⁰ Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

9.7 Land

Te Arawa Climate Change Working Group (105) supports the consideration of ‘Land’ captured as follows: ‘Any future proposal to use highly productive land (Land Use Capability Class 2 and 3 that is versatile and classed as being best suited to food and fibre production). Council will need to carefully consider whether the land is needed to meet demand, in these locations. The submitter also stated that the FDS must ensure adequate land is identified for food¹¹¹ growing to enable localised food and resource circular economies, and to support locally grown foods for the health, wellbeing and employment of local food growers and communities. The submitter further stated that integrated land uses¹¹² incorporate food and fibre production with meaningful, significant and even primarily environmental restoration. **Bennett (96)** noted that the security of land be carefully considered if residential development spreads into industrial, agricultural or horticultural areas. **Meza (99)** outlined that sufficient provision needs to be made for the production of basic food like fruit and vegetables so the people are less vulnerable to the fluctuating markets. According to the submitter the abundance of farmland and forestry¹¹³ land should be considered for the purpose.

Rotorua/ Taupō Federated Farmers of New Zealand (82) stated that it is important to ensure:

- Highly productive soils are protected from inappropriate use or development as directed by the National Policy Statement for Highly Productive Land 2022 (NPS-HPL)
- Further urban encroachment on and fragmentation of productive land is prevented
- Information for Federated Farmers to better understand how the FDS will link the requirements of the NPS-HPL in protecting the productive capacity of highly productive land¹¹⁴. It is important that other alternatives are thoroughly explored when considering development into rural areas. It is important that Council break down barriers to incentivise development in existing urban areas.

Dillion (90) asked how the NPS-HPL has been reflected in the constraints map. The submitter notes that much of the east side of the city is not urbanised and has high quality soil, which has been granted extra protection through the NPS-HPL, potentially significantly limiting the ability to urbanise such areas. **Toi Te Ora Public Health (108)** indicated that in relation to the development of land within each of the major centres, it could be advantageous to locate and reserve land that is dedicated for diverse and innovative horticulture procurement and food systems. **Iwi¹¹⁵ Aspirations Hui Feedback** was that the community wanted to know how the environment can be protected. For example food gardens for more sustainable living.

9.8 Biodiversity

Te Arawa Climate Change Working Group (105) supports the consideration of ‘Biodiversity’ in the FDS captured as follows: ‘Future development areas must protect existing areas of indigenous biodiversity and look for opportunities to enhance this, including by restoring wetland and riparian margins.’ The submitter states that

¹¹¹ According to the submitter: Te Ara ki Kōpū: Te Arawa Climate Change Strategy identified that having access to abundant mahinga kai is a priority for our whānau and hapū. In this time of climate change, with increasingly vulnerable national and international food systems

¹¹² According to the submitter: Environmental restoration is a higher priority than food and fibre as a singular exclusive land use. The loss of wetlands is almost entirely due to the assumption that lower flat lands are suited to dairy farming as one example.

¹¹³ According to the submitter: “Does the benefit of having an extensive forestry industry in our area outweigh the need for land for housing?”

¹¹⁴ According to the submitter: It is acknowledged that Council has recognised that any future proposal to use this land for business will need to carefully consider whether this land is needed to meet demand in the context of alternatives available at the time, as required by the NPS-HPL

¹¹⁵ Rural Area (Otaramarae south to Rotomā) Pre-engagement

other opportunities to increase biodiversity can include: exploring the setting of targets to increase vegetation cover within the urban area particularly in our streets, open spaces and on the edges of our rivers and streams and combing off-setting measures to reduce nitrogen entering Lake Rotorua, by exploring opportunities to convert agricultural land to native bush and public open space. The submitter notes that future development areas must ensure no further degradation of existing areas of indigenous biodiversity and urgently implement enhancement¹¹⁶ and restoration¹¹⁷ “as close as possible to pre-European characteristics and quality.”

9.9 Air Quality

Toi Te Ora Public Health (108) noted that wild fire smoke is a recognised hazard for the Rotorua community due to its proximity to the Kaimanawa forest. The submitter stated that reducing heat¹¹⁸ in urban areas will go a long way to reducing the likelihood of the Rotorua residents from being exposed to smoke and reduced air quality. **Iwi¹¹⁹ Aspirations Hui Feedback** was that the only time when air seems to be clear in Ngāpuna and there is no noise in this area, is the three weeks when ‘the mill’ closes during the year, **Te Arawa Climate Change Working Group (105)** supported the consideration of ‘Air Quality’ as captured in the FDS as follows: ‘Encouraging heavy industry operators to relocate, which provides the opportunity to implement cleaner technologies’

¹¹⁶ According to the submitter: Te Arawa must lead in vegetation design and composition relative to traditional land cover and be supported to utilise specialised exotic plants for an interim period to heal land and birdlife until native cover can be restored as closely as possible.

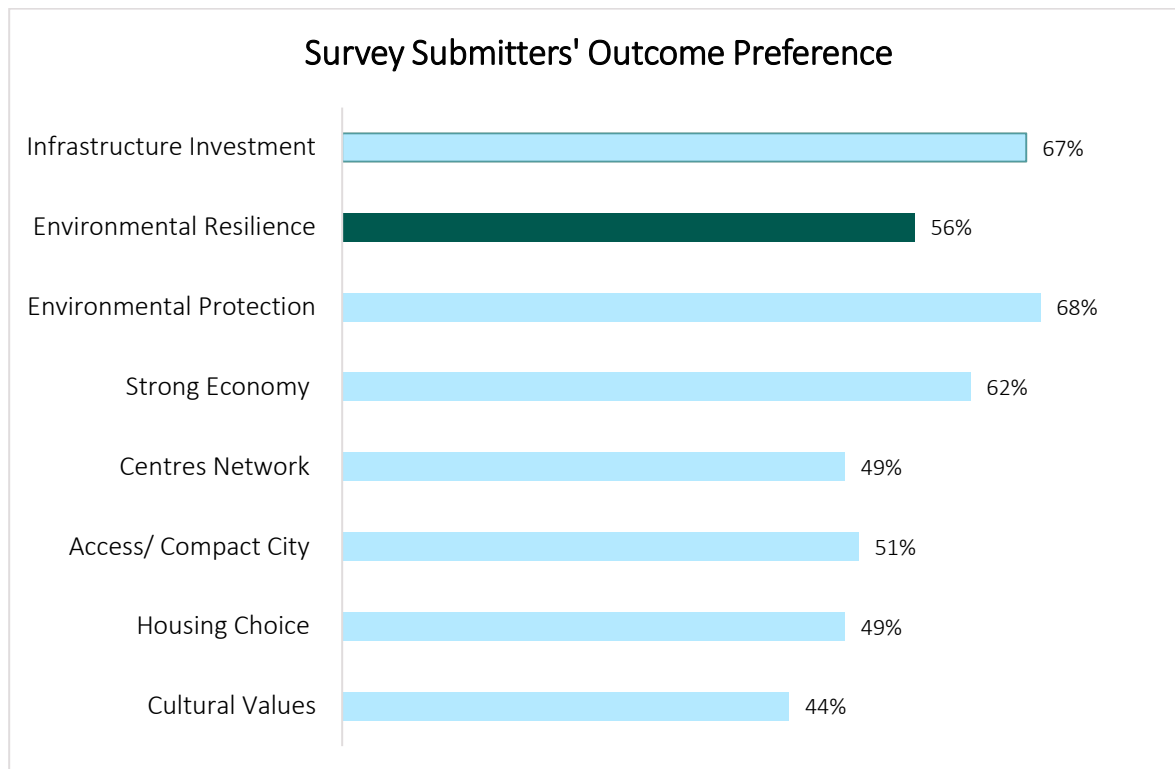
¹¹⁷ According to the submitter: Reforesting of the Rotorua district and restoration of wetlands and indigenous ecosystems will aid in mitigating climate change impacts, restoring our natural environment, and ultimately supporting the health and wellbeing of our communities.

¹¹⁸ The submitter indicated that further information is available to the public and local authorities on their ‘extreme heat website page’, and any questions about heat health plans can be directed to Annaka Davis at Toi Te Ora in the first instance

¹¹⁹ Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

10.0 Resilient – Effects of Climate Change and Natural Hazards

10.1 Support for Outcome



A total of 56% of the online survey submitters¹²⁰ indicated their support for this outcome.

10.2 Climate Change Mitigation

“Climate change mitigation is about lowering human induced greenhouse gas (GHG) emissions and taking steps to remove GHG emissions from the atmosphere.”

Iwi¹²¹ Aspirations Hui Feedback was that there are concerns that current industries of Rotorua “Will we continue to rely on forestry and agriculture when the country is considering other options?” as this impacts on climate change. **66 McFetridge Drive (92)** stated that the draft FDS does not give due consideration to the reduction of greenhouse gas emissions by way of livestock reduction or the positive impact that livestock reduction would have on our waterways and lakes. Not having allowance for greenfield developments that reduce livestock farming seems to be a big gap in this draft FDS and not consistent with the environmental objectives of Rotorua Lakes catchment, as reflected in the current District Plan¹²². The submitter went on to note support of this approach, while acknowledging transport reduction is also important, according to the

¹²⁰ Two-thirds of the submitters completed the online survey submission

¹²¹ Central Area (Ngongotahā to the Puarenga Stream) Pre-engagement

¹²² According to the submitter: The District Plan allows for additional rural lifestyle lots for reductions in intensive farming. In addition, the BOPRC has recently changed the Regional Natural Resources Plan to require nutrient reduction to support initiatives to improve the lake water quality in Lake Rotorua. It is surprising that these factors were not evaluated in assessing potential sites for rural residential development.

Ministry for the Environment reducing livestock, especially the dairy herd, is a key objective¹²³ for carbon emission reduction in New Zealand. For Rotorua's FDS not to explicitly support land use change on farms, especially dairy farms, to housing development, through rural residential subdivisions, could be considered contradictory to stated carbon emission reduction goals and the existing improving water quality objectives.

Rotorua Business Chamber (76) emphasised that consideration could be given to establishing multi-purpose, scale-able permanent carbon farm forestry in Ngongotahā (achieved in association with carbon offset investments for local businesses). It would positively impact lake water quality (retirement of grazing) and provide another option for recreational tourism similar to the Whakarewarewa forest model.

Waka Kotahi (77) motivated for a reduction in the extent of greenfields growth areas identified around Ngongotahā, and/or a delay in the timing of the release of land from that identified in the draft Strategy noting that emissions from these trips will also likely offset¹²⁴ some, if not all, of the reductions in Vehicle Kilometres Travelled (VKT) and emissions achieved through other actions in the strategy. The submitter highlights that the majority of employment opportunities in Rotorua lie outside the average Rotorua commute distance from Ngongotahā, suggesting that these trips will on average contribute to increases in VKT. **Rotorua/ Taupō Federated Farmers of New Zealand (82)** stated that there needs to be clear how the FDS is fit to achieve a well-functioning urban environment in the existing and future urban areas while supporting reductions in greenhouse gas emissions and resilience to climate change.

Te Arawa Climate Change Working Group (105) supported the consideration of 'Climate Change Mitigation' in the FDS as captured as follows: 'Working towards increasing native and exotic biodiversity cover within the urban area in streets, public open spaces riparian margins and wetlands.' The submitter supports specifically working towards increasing native and exotic biodiversity cover in publicly owned lands in rural areas, including any sites acquired in the future for the purpose of nitrogen off-setting. The submitter also supports promoting an urban form that encourages walking and cycling as the primary mode of transport rather than driving. The submitter however is of the view that the fails to consider the rights of Te Arawa to make decisions about their communities and in particular decide for themselves the mitigation and/or adaptation actions they wish to undertake within their papakāinga communities to ensure the health and wellbeing of their communities and future generations. The submitter also outlined that the Rotorua FDS must include careful planning to ensure prioritised investment in climate safe and sustainable infrastructure to enable 'degrowth'¹²⁵ where and when it is needed.

Iwi¹²⁶ Aspirations Hui Feedback was that rural communities need the infrastructure for a sustainable future for their children and that there is a need to prepare for this. For example by providing: solar power, fibre and electrical vehicle charging stations. The **Te Arawa Climate Change Working Group (105)** stated that the demand for heavy industry-sourced products and services needs to be reduced through infrastructure and spending allocation that supports more natural¹²⁷ modes of transport and community life.

¹²³ see: <https://environment.govt.nz/publications/new-zealands-greenhouse-gas-inventory-1990-2020-snapshot/> and [Aotearoa New Zealand's first emissions reduction plan Ministry for the Environment](#)

¹²⁴ According to the submitter: The distance between Ngongotahā and Tauriko business estate is 7.5 times the existing average Rotorua commuting trip suggesting the strategy could lead to an increase in vehicle kilometres travelled (VKT).

¹²⁵ According to the submitter: The scope of the FDS is limited to Pākehā worldviews. Growth is a strain on our systems. As Te Arawa we are forced to ask, "Who is this growth for?" Based on past performance, growth has never benefitted Te Arawa. The FDS is following very Western assumptions about what a future world might look like. The philosophy and opinion that is underpinning the FDS does not incorporate Te Arawa mātauranga and is based on both hidden and outright biases.

¹²⁶ Rural Area- (Otaramarae south to Rotomā) Pre-engagement

¹²⁷ According to the submitter: Te Arawa is pivotal to influencing the evolution of this thinking because this is a mirror of traditional values and approaches to life and resource management.

Toi Te Ora Public Health (108) indicated that they are supportive and would like to recognise the work by RLC to build on the Climate Action Plan and the understanding that there are imminent risks associated with Rotorua, such as heavy rainfall and extreme heat. The submitter stated that it is positive to see that the FDS is also aligning and building off of the RLC Climate Action Plan. As it is recognised in the FDS the submitter considers that it is important for shaping development and investment in infrastructure that will influence behaviour change and health outcomes. The submitter emphasises that they would like to see further development of the Climate Action Plan to include ‘science-based targets’ in conjunction with emission reduction targets. The submitter further noted that extreme heat as mentioned in the FDS and Climate action plan is a significant impact and a concern for public health. The submitter indicated that they would support RLC, in conjunction with other governmental organisations, to develop solutions to reduce and mitigate the impacts of extreme heat and other climate change public health impacts. This includes supporting RLC to develop a Heat Health Plan.

Te Arawa Climate Change Working Group (105) requested that the FDS prioritises the resourcing of the Rotorua Climate Action Plan 2021 (which currently only has 0.1FTE dedicated to it). RLC has an obligation to:

- The Rotorua community to get serious about climate change adaptation planning and resilience building by resourcing climate action appropriately.
- work with Te Arawa to enable and support our hapū and papakāinga communities to achieve their own prioritised climate actions as outlined within Te Ara ki Kōpū: Te Arawa Climate Change Strategy

10.3 Climate Change Adaptation

“We also need to adapt to the effects of climate change. Of particular relevance to urban development and land use planning are the effects of increased rainfall, including an increase in the frequency and severity of flooding.”

Rotorua Business Chamber (76) supported section in the FDS noting that it is a considerable subject area that requires ‘special/ unique’ treatment due to the significant impact of climate change (that we are currently experiencing). The submitter proposed that a new approach to this topic is considered- “shifting from future ideals” which addressed how the effects of climate change are dealt with.” The submitter stated further that consideration needs to be given to infrastructure implications which according to the submitter is a concern for rural land users in particular. **Eckersley (31)** emphasised that medium density housing in current suburbs increases flood risks and ruins neighbourhoods, so we should rather focus on new areas. **Iwi¹²⁸ Aspirations Hui Feedback** was that in relation to papakāinga, there is a concern about developing on some of their whenua, particularly within Ngāpuna, due to natural hazards.

10.3.1 Flood Hazard Management

Drop-in¹²⁹ Session Feedback was that there are general concerns in respect of climate change and increased rainfall. **Rotorua Business Chamber** noted that achieving ‘this level’ of growth (proposed in the FDS) for Ngongotahā will require addressing and resolving flooding of the Ngongotahā stream. **Te Arawa Climate Change Working Group (105)** supported the focus on Climate Change Adaptation in the FDS, specifically with respect to the overall objective for flood hazard management being to reduce risk in the medium and high flood hazard areas. The submitter however highlighted that the Rotorua FDS suggests that around 750 new houses could be provided in the recently rezoned Pukehangi Height’s existing green field area. The submitter stated that despite iwi objecting outright to the development due to its potential downstream effects on papakāinga communities that include Ōhinemutu, Te Koutu and Kawaha Point that are prone to flooding the

¹²⁸ Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

¹²⁹ Ngongotahā

development of the area went ahead. The submitter went on to state that in terms of the approach to flood mitigation and stormwater management, the FDS:

- Needs to include reference to a policy to ensure hazard risks are not increased for Te Arawa papakāinga communities with medium and high flooding¹³⁰ risks.
- Include reference to green infrastructure. The submitter noted that this is missing from the key initiatives listed within the FDS (Page 63 of the draft FDS) and must be included to support flood mitigation and Te Mauri me te Mana o te Wai obligations.

Iwi¹³¹ Aspirations Hui Feedback was that the Mourea community is concerned about the effects of climate change and the damage that is being done to the environment. The submitter noted that there are great concerns expressed with the use of the Ōhau Channel for boating, the high lake level and the associated inundation effects on the land because of this. **Dillon (90)** stated, with respect to the Central Priority Area that the Utuhina stream has a significant existing flooding risk, which will be exacerbated by further urban development in its catchment. The submitter further noted that the costs of mitigating the risk are potentially significant, and need to be quantified and factored into determining development options through an iterative process. The submitter stated that a potential outcome is that intensification and required flood risk mitigation are simply too expensive for ratepayers, and that alternative, less risky and cheaper locations are sought. The submitter argues that analysis of this iterative assessment needs to be demonstrated.

Sigma Consultants Ltd (94) stated that stormwater mitigation is critical from a natural hazards perspective and noted that there is an opportunity to address water quality. The submitter then outlined that greater emphasis here would be useful for guiding Infrastructure Strategies. **Iwi¹³² Aspirations Hui Feedback** was that number of their papakāinga and neighbourhoods are vulnerable (prone to flooding). The community indicated that it is important to ensure that there is safe development and there is a need to engage with technologies that protect residents from flooding. **Leonard (24)** outlined that Council should build a suburb like Sunfield? An innovative¹³³ development proposed near Papakura, Auckland

¹³⁰ According to the submitter: RLC has an obligation to ensure Te Arawa papakāinga communities are not displaced by the development of housing in areas that will exacerbate flood risks for our communities.

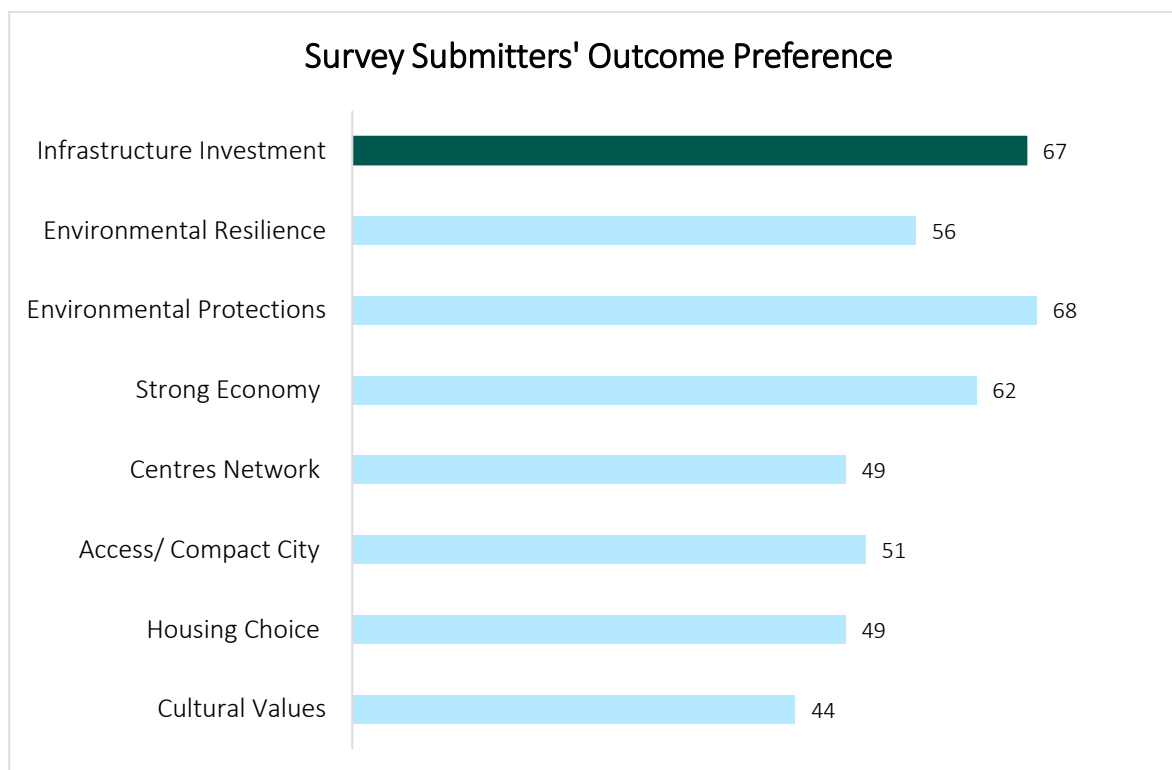
¹³¹ Rural Area (Otaramarae south to Rotomā) Pre-engagement

¹³² Central Area (Ngongotahā to the Puarenga Stream) Pre-engagement

¹³³ <https://winton.nz/our-neighbourhoods/sunfield/>, or implement urban planning and infrastructure that is smarter, to mitigate severe flooding. <https://www.scoop.co.nz/stories/AK2302/S00069/landscape-based-solutions-key-in-wake-of-flooding-emergency.htm>. <https://www.auckland.ac.nz/en/news/2023/01/31/smarter-design-to-mitigate-auckland-floods.html>

11.0 Investment – Smart, Safe and Reliable Infrastructure

11.1 Support for Outcome



A total of 67% of the online survey submitters¹³⁴ indicated their support for this outcome.

11.2 Infrastructure Investment

Iwi¹³⁵ Aspirations Hui Feedback was a concern as to whether there would be sufficient infrastructure to support all the new development? **Wylie (21)** stated that she would not like to see housing rushed and then find there are a lot of infrastructure issues. **Ōwhata Kōhanga Rākau Housing Limited Partnership (84)** indicated that infrastructure development to enable housing is desperately needed in the Eastside and Ōwhata area.

Toi Te Ora Public Health (108) supports the aim to develop diverse but focused infrastructure that will service the community, by connecting them to work, living, and the natural environment, also in keeping with healthy urban development. **Rotorua/ Taupō Federated Farmers of New Zealand (82)** supported smart investment as an outcome of the FDS, to accommodate compact growth. The submitter indicated that there is a need to ensure public infrastructure can cope with further urban development pressures and costs of any new infrastructure are recovered fairly and equitably, based on who uses and benefits from the services. **Summerset Group Holdings Limited (88)** strongly supported maximising the enablement of housing supply in critical growth areas that are well serviced by existing infrastructure.

¹³⁴ Two-thirds of the submitters completed the online survey submission

¹³⁵ Central Area (Ngongotahā to the Puarenga Stream) Pre-engagement

Ministry of Education (78) noted that the proposals for medium and higher density residential opportunities in the central area would need to be supported by a number of infrastructure improvements. It was further acknowledged that the Infrastructure Acceleration Fund (IAF) and shovel-ready funding has been provided for the central, west and eastern growth areas. The submitter stated that at present, there is the potential that this investment would be diluted through the development of multiple greenfield growth areas at once. The submitter went on to emphasise that this provides a lack of certainty as to where development will ultimately occur and what the timing would be. The submitter also noted that the very broad nature of the four Priority Development Areas which makes it difficult to understand where investment will be prioritised and consequently where uptake is likely to occur. The submitter requests that FDS therefore provides greater focus for both urban development and infrastructure providers which is essential in order to be able to deliver on the outcomes identified.

Bennett (96) indicated that the plans in each area to upgrade waste, drinking water, and stormwater infrastructure are important as they are key 'platforms for public health'. **Bentley (16)** stated that investments should only be spent on Council owned property not on property owned by others. **Dillion (90)** argued that much more needs to be demonstrated in the draft FDS on how infrastructure and its cost has been factored into the various scenarios examined and in determining the urban pattern proposed through the draft FDS. The submitter states that from the discussion presented, there remains considerable uncertainty about the ability of infrastructure to service the urban form proposed. For example under 'Wastewater and Nutrient discharge' it is stated: "A key issue for wastewater in the future, however, will be operating within the nitrogen discharge allowance as the population grows."

11.3 Infrastructure and Development Constraints

Dillon (90) stated that there is a mismatch between the constraints and opportunities shown on the heat map in the FDS, and what is 'happening on the ground' through proposed Plan Change 9 (PC9). Many areas of the city are heavily constrained by among other things stormwater, geothermal and soil stability issues, which is not fully reflected in the constraints heat map. The submitter then noted that Rotorua's soft ground is a major constraint on the feasibility of the construction of higher density and higher buildings around the city centre. He further stated that as acknowledged, flooding is a constraint in the west of the city. He however noted that PC9 rezones many of these areas to higher density with limited acknowledgement of their constraints reflected through the limited use of qualifying matters, and is at odds with the constraints sections of the draft FDS. The submitter highlights that PC9 is also pre-emptive of the draft FDS as decisions about where growth is going to go have largely been made through that plan change, and will be difficult to reverse.

Kāinga Ora (75) argued that clarity needs to be provided on: i) How much land is constrained in and around the City Centre (in relation to ground conditions, geothermal activity and financial feasibility- high density housing/ multi-storey typologies) and ii) How these concerns will be managed as these constraints will inform the uptake of intensification and reliance on high density. **McCabe (101)** stated that the current ground and soil conditions of the Rotorua urban area and the ability to be able to develop high density/high rise apartments is a concern. **Watson (27)** indicated that council has made it extremely difficult to build a two story building in the past so questions how the development of six story building will be facilitated. **Iwi¹³⁶ Aspirations Hui Feedback** was that there are current issues with building houses in the area due to the amount of requirements such as onerous geotechnical requirements etc. which makes development very cost prohibitive. **Sigma Consultants Ltd (94)** indicated that there are limitations relating to soft ground near lake edge should also be acknowledged given the previous issues, and to ensure funding is available for

¹³⁶ Rural Area (Otaramarae south to Rotomā) Pre-engagement

investigations going forward. **Student¹³⁷ Workshop Feedback** was that there should be no new residential development in Owhata road due to land stability issues.

11.4 Roding, Transport and Parking

11.4.1 Traffic

Carr (52) stated that we need to be careful how many houses are built to make sure that there is enough facilities and infrastructure to accommodate the extra traffic. **Facebook¹³⁸ Feedback** was that we need to consider the transport infrastructure before building houses, ideally future proofing the network and then constructing houses. **Facebook¹³⁹ Feedback** was “Anyone up for Auckland traffic congestion?” It was then stated that we need a city that's easy to get around and that a better roading network is required if Rotorua going to grow.

Ngongotahā

Drop-in¹⁴⁰ Session Feedback was “What discussions have been had with Waka Kotahi (NZTA)?” as current traffic through the Ngongotahā town is an issue. **Simmonds (97)** appealed to Council to consider how the proposals in the FDS will directly impact¹⁴¹ the traffic flow through Ngongotahā. She indicated that serious consideration needs to be given to what roading infrastructure¹⁴² will be required to cope with this as what used to be a 17 minute commute is now usually half an hour (or more). The submitter stated further that if Ngongotahā Village is turned into a 30km pedestrian friendly zone (currently being considered), will create a significant backlog¹⁴³ of traffic. **Moore (103)** and **Simmonds (97)** proposed that a bypass is constructed alongside the cycle path into the city from Parawai Road and at least as far north as the Tauranga Direct Road), because of traffic issues. **Rotorua Business Chamber (76)** stated that achieving the level of growth proposed in the FDS for Ngongotahā will require four laning of SH 5 from the Ngongotahā roundabout to the Mitai Maori Village. **Facebook¹⁴⁴ Feedback** was that Ngongotahā Road needs to be double laned before any building takes place as this area is congested already.

Eastside

Student¹⁴⁵ Workshop Feedback was that more available roads around Te Ngae road would help to ease traffic. **Ngapapa (19)** indicated that they have an issue regarding the exiting their suburb along Vaughn Road, due to traffic congestion caused by the new housing developments. **Rotorua Business Chamber (76)** indicated that considerations needs to be given to the full four laning beyond the airport extending to the new roundabout at SH30/33.

¹³⁷ Toi Ohomai Mokoia Campus, Rotorua (carpentry and electrical students)

¹³⁸ Gaylor

¹³⁹ Simmonds

¹⁴⁰ Ngongotahā

¹⁴¹ “My husband and I live in Hamurana and already experience congestion in Ngongotahā almost on a daily basis on our way to work.”

¹⁴² According to the submitter: “We have lived in Hamurana for over 20 years and the increase in housing and accordingly traffic has been marked. However, there has been no change in the roads and if Council wants to build more houses, increase subdivisions and expand Ngongotahā, then it must come with better roading to deal with more people.”

¹⁴³ According to the submitter: not only for the regular car users but the large trucks that regularly drive through from the Tauranga Direct Road, or going around the back of the lake to avoid *Te Ngae* Road

¹⁴⁴ Lynda Walsh

¹⁴⁵ Toi Ohomai Mokoia Campus, Rotorua (carpentry and electrical students)

Central and Westside

Rotorua Business Chamber (76) stated that ‘through-traffic’ travelling along SH5 needs careful consideration from both a flow and safety perspective. **Student¹⁴⁶ Workshop Feedback** was that roading infrastructure around central schools requires significant improvement as there are traffic jams at school times.

Safety and Management

Student¹⁴⁷ Workshop Feedback was that in general better traffic control is needed. Further **Student¹⁴⁸ Workshop Feedback** was that Ngongotahā requires better traffic management in particular. **Iwi¹⁴⁹ Aspirations Hui Feedback** was that the community were concerned about the traffic particularly as it relates to safety. **Bennett (96)** noted that Council needs to consider safe roading infrastructure, including measures to slow and calm traffic (e.g. Roundabouts, speed bumps). The submitter claimed that research suggests that traffic calming measures can lead to a reduction in collisions, injuries and deaths. **Odim (89)** indicated that Te Ngae Road or any of the multilane roads are “hostile to humans.” The submitter then stated that a main corridor through Eastside is better than SH5 and SH30A west of the town, which is ‘terrifying’ in some locations.

11.4.2 Roads

Facebook¹⁵⁰ Feedback was that there is more housing, more people and more cars but same “old unfit for purpose roads.” **Facebook¹⁵¹ Feedback** and **Student¹⁵² Workshop Feedback** was that better roads are needed in Rotorua. **Iwi¹⁵³ Aspirations Hui Feedback** was that roads in the area (Otaramarae south to Rotomā) have not been maintained and there is also concern that roads based on their location will become flooded. **Facebook¹⁵⁴ Feedback** was that Pongakawa Valley Road needs tar sealing urgently. **Student¹⁵⁵ Workshop Feedback** was that road widths are generally too narrow and further **Student¹⁵⁶ Workshop Feedback** was that the potholes need to be fixed.

Sigma Consultants Ltd (94) stated that tourism is a critical component of Rotorua’s economy and identity and that currently the linkages between the main urban areas of Rotorua and the Lakes are disjointed. The submitter however stated that recent works have helped to improve this: Tarawera Road/SH30 upgrades, Titokorangi Drive (Long Mile) (landscape treatment, increased tourism focus/ sculptures) and the relatively new mountain biking hub – Te Pūtaka o Tawa further up Tarawera Road have helped consolidate the route. The submitter further outlined that given the importance of tourism to the economy as well as the importance of the Okareka settlement in particular in contributing to housing options, the use of the document in guiding future investment, consideration should be given to including the Lakes within the extent of the FDS. Most notably the FDS should expand its focus in relation to Tarawera Road and other key roads.

¹⁴⁶ Toi Ohomai Mokoia Campus, Rotorua (carpentry and electrical students)

¹⁴⁷ John Paul College (Year 11 and 12 students)

¹⁴⁸ Rotorua Intermediate (Year 7 and 8 students)

¹⁴⁹ Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

¹⁵⁰ Simmonds

¹⁵¹ Douglas

¹⁵² John Paul College (Year 11 and 12 students)

¹⁵³ Rural Area (Otaramarae south to Rotomā) Pre-engagement

¹⁵⁴ Rutherford

¹⁵⁵ Toi Ohomai Mokoia Campus, Rotorua (carpentry and electrical students)

¹⁵⁶ Rotorua Intermediate (Year 7 and 8 students)

11.4.3 Transport

Public Transport

Student¹⁵⁷ Workshop Feedback was that Public transport is important and **Jaffer (55)** indicated that an Improvement in bus trip frequencies and street crossings is needed. **Waka Kotahi (77)** outlined that Council needs to consider whether other physical investments are required to support more frequent services and the delivery of the outcomes sought in the FDS- such as a public transport hub (or hubs), park and ride facilities, and/or on road bus priority infrastructure. **Moore (103)** stated that Rotorua should not enable growth areas until transport corridors are addressed.

Student¹⁵⁸ Workshop Feedback was that Rotorua should also consider rail transport. **Student¹⁵⁹ Workshop Feedback** was that trams and a ferry across Lake Rotorua should also be considered. **Student¹⁶⁰ Workshop Feedback** was that Rotorua establishes an International airport. **Drop-in¹⁶¹ Session Feedback** was “What are the plans for the airport, how are we encouraging other carriers?”

Active Transport

Te Arawa Climate Change Working Group (105) stated that with respect to transport infrastructure the FDS must ensure:

- The development of appropriate infrastructure that drives safe climate-friendly transport options including walking, cycling, e-bikes and scooters; as well as efficient public transport as the primary mode of transport rather than driving for the Rotorua central city.
- The provision of bike lanes to rural marae such as Horohoro to support whānau to transition to other transport modes.
- Development of the transport network does not impact on Te Mauri me te Mana o te Wai thru the designing of cycleways within the riparian zones of waterways, rivers and lakes vulnerable to erosion.
- Te Mauri me te Mana o te Wai is prioritised within all decision making and improvements in transport infrastructure includes the staged removal of existing paths out of the riparian zones of waterways, rivers and lakes prone to erosion such as the Utuhina stream.

Bennett (96) supports the plans for improvements in public transport, walking and cycling infrastructure in the development areas. **Odin (89)** indicated that the east is ‘sliced-up’ by traffic corridors with no space for ‘active’ transport modes. **Sigma Consultants Ltd (94)** supported network-wide upgrades to pedestrian and cycle facilities in the central area.’ **Jaffer (55)** stated that Rotorua needs to be more pedestrian friendly and the **Student¹⁶² Workshop Feedback** was that more paths are required. The **Student¹⁶³ Workshop Feedback** was along with other modes they would like “to get around” using ‘Lime scooters’ and ‘E-bikes’. Further **Student¹⁶⁴ Workshop Feedback** was that they would also like to “get around Rotorua” via cheap electric cars and have electric wheel chairs available.

¹⁵⁷ John Paul College (Year 11 and 12 students)

¹⁵⁸ Rotorua Boys High School (Year 12 and 13 students)

¹⁵⁹ Rotorua Intermediate (Year 7 and 8 students)

¹⁶⁰ Rotorua Intermediate (Year 7 and 8 students)

¹⁶¹ Central Area

¹⁶² John Paul College (Year 11 and 12 students)

¹⁶³ Rotorua Boys High School (Year 12 and 13 students)

¹⁶⁴ Rotorua Intermediate (Year 7 and 8 students)

11.4.4 Parking Management

Prichard (30) indicated that parking for workers in town can be a problem and that paying for an eight hour day doesn't work for most workers in town (who are experiencing financial issues). **Sinclair (54)** stated that there is insufficient parking for the people who live in Rotorua, with multiple vehicles parked on the road, footpaths and grass spaces. For example the corner Lytton and Malfoy Road.

11.4.5 Stormwater

Ōwhata Kōhanga Rākau Housing Limited Partnership (84) stated that there is a need for the improvements to the stormwater network in Eastside to support future housing in that area. The submitter urged that Council prioritises and addresses the stormwater issues¹⁶⁵ in Eastside as part of enabling development in that area. The submitter highlighted that the shortfalls in the stormwater network has resulted in their housing project facing significant cost and difficulties to engineer stormwater solutions, to manage the impacts of earlier development surrounding the project's site¹⁶⁶. According to the submitter it is appropriate that Council provide a wholesale stormwater solution that factors in all future growth planned for Eastside rather than on a piece meal basis in response to individual developments.

Iwi¹⁶⁷ Aspirations Hui Feedback was that stormwater is an issue in Koutu and Ōhinemutu. **Wylie (21)** stated that her area is prone to flooding as she lives next door to Waiowhiro Stream. The submitter therefore expressed concern with the potential of additional intensified housing is adding pressure to on stormwater infrastructure such as drains etc. **Sinclair (54)** notes that recent new builds have already caused flooding, and rain water run off issues, in this area. The submitter argued that drainage in this area will be insufficient to deal with multi-storey buildings. **Student¹⁶⁸ Workshop Feedback** was that more drains are needed in the future.

11.4.6 Water Supply

Te Arawa Climate Change Working Group (105) supported the consideration on water supply as an infrastructure constraint in the FDS as captured by the following statement: "using water more efficiently by managing future demand, providing for on-site water reuse, and minimising loses in the network will be a key first step in providing for growth within current limits."

11.4.7 Waste Management

Iwi¹⁶⁹ Aspirations Hui Feedback was that there are a lot of problems with sewerage. The community members indicated that the sewerage pipes used to work and the new pipes that have been installed currently do not. **Ngapapa (19)** indicated that there is pressure on their sewage pump in Ngapuna. **Smith (56)** stated that growth is supported if roading, sewage upgrades etc. are completed first. **Facebook¹⁷⁰ Feedback** was that Council needs to make sure the waste and storm water pipes are "big enough and new enough, to handle the extra

¹⁶⁵According to the submitter: It is well acknowledged in Council's planning and policy documents that the stormwater network in Eastside is undersized in capacity and needs improvement.

¹⁶⁶ 21-31 Ōwhata Road

¹⁶⁷ Rural Area (Otaramarae south to Rotomā) Pre-engagement

¹⁶⁸ Rotorua Boys High School (Year 12 and 13 students)

¹⁶⁹ Central Area (Ngongotahā to the Puarenga Stream) Pre-engagement

¹⁷⁰ Harris

flow pressure, so we don't end up like Auckland and other areas did.” **Facebook¹⁷¹ Feedback** was that a bigger waste treatment plant is needed as the current one is struggling. **Iwi¹⁷² Aspirations Hui Feedback** was that the community is not confident that the upgrade of the wastewater treatment plant will accommodate the increased demand from growth.

Student¹⁷³ Workshop Feedback was that the students would like safe and clean environment in the future. **Wineera (40)** stated that more coloured rubbish bins are needed and more community funding is required to educate households on gardens, composting and to “lay the foundation down to set up a community recycling centre run by the community.” **Student¹⁷⁴ Workshop Feedback** was that the students would like a safe and clean environment in the future. **Iwi¹⁷⁵ Aspirations Hui Feedback** was that Council needs to think ahead / “outside of the box” in terms of infrastructure and service provision. The community stated further that rubbish is being carried down the Utuhina stream and being deposited in the bay at the mouth of the Utuhina stream. The community acknowledged that mana whenua also need to come together to find solutions to these issues.

11.5.8 Utilities

Spark, Chorus, One NZ (formerly Vodafone), Connexa and FortySouth (83) stated that the FDS needs to identify how it will support and enable infrastructure, which includes telecommunications. The submitter noted that the FDS stated on page 62 that “*The FDS provides a framework for the Councils and infrastructure providers to undertake more detailed infrastructure planning and explore the range of funding options available. This will happen on a staged basis over time.*” The submitter went on to state that it is not clear what the framework or opportunity for discussion and future infrastructure planning is and that there needs to be greater clarity in this regard. The submitter then stated that the FDS needs to recognise the critical importance of telecommunications to Rotorua and indicated that the spatial scenarios used to develop the FDS are going to need new¹⁷⁶ telecommunications networks. **Transpower (104)** supported Reference to “power supply” as a constraint within the draft FDS and Technical Report. The submitter supported the FDS’S approach of identifying the National Grid as a constraint on development and the application of a “go carefully” constraint classification applying to sites or areas traversed by the National Grid.

11.5.9 Schools

Student¹⁷⁷ Workshop Feedback was that schools and universities are important to their future. **Student¹⁷⁸ Workshop Feedback** was that better schools and more schools are required. **Liz (37)** stated that there’s going to be pressure on the schools (including currently full schools) and questioned whether government will be able to support schools in the context of new builds and the large increase of students. **Eckersley (31)** stated that it is important to ensure sufficient schooling is planned for to complement new housing. **Ministry of Education (78)** supported the statement in the FDS that RLC will need to continue to work with the Ministry to assess the capacity of Western Heights High School as growth occurs in the Westside and in Ngongotahā. The submitter noted that there may be other educational requirements that result from the additional development in the Western Priority Development Area, due to tight capacity in some other schools in the

¹⁷¹ Curtis

¹⁷² Eastern Area (Tikitere to Ngāpuna) Pre Engagement

¹⁷³ Rotorua Intermediate (Year 7 and 8 students)

¹⁷⁴ Rotorua Intermediate (Year 7 and 8 students)

¹⁷⁵ Rural Area (Otaramarae south to Rotomā) Pre-engagement

¹⁷⁶ According to the submitter: The existing areas that will be densified also will require additional cell-sites and upgrading of the networks.

¹⁷⁷ Rotorua Intermediate (Year 7 and 8 students)

¹⁷⁸ John Paul College (Year 11 and 12 students)

area. **Student¹⁷⁹ Workshop Feedback** was that Lynmore primary school capacity needs are to be addressed now. **Bunker (59)** indicated that Glenholme, Malfroy and Rotorua Primary Schools are already at capacity and have enrolment schemes. **Ministry of Education (78)** stated that the growth provided for in Ngongotahā is significant and will require careful planning and investment particularly around staging and options to expand or provide new educational assets in this location. The submitter noted that the staging and timing of development in Ngongotahā will need to be carefully understood to inform Ministry decision-making on future educational requirements.

11.5.10 Hospital/ Medical Facilities

Wylie (21) noted that a concern is that “we are going to overcrowd our city and have a burden on facilities such as hospitals.” **Morrow (34)** stated that the Rotorua Hospital is already struggling with bed numbers. The submitter further stated that at times the elderly are unable to be discharged home due to lack of carer supports which creates a grid lock in the hospital. The submitter stated that there is a lack of residential and nursing home beds available and that more retirement and nursing care homes need to be built. **Iwi¹⁸⁰ Aspirations Hui Feedback** was that hospital/medical consideration need to be included in the strategy. They indicated that there is no point in providing additional capacity for housing if there is inadequate infrastructure to support it. This is affirmed with **Facebook¹⁸¹ Feedback** as follows: “Hope you’ll be expanding the hospital and putting in more schools ...that should be the priority if you plan that many more households....” Further **Facebook¹⁸² Feedback** was that the hospital is struggling with demand for beds and increasing need for Rest home/ retirement homes. **Student¹⁸³ Workshop Feedback** was that more doctors’ offices, hospitals and healthcare is needed for the future. **Student¹⁸⁴ Workshop Feedback** was that there is a need for a hospital in Owhata, a hospital in Eastside and more medical care needed in the new development areas. **Iwi¹⁸⁵ Aspirations Hui Feedback** was there is a need for a social hub within the Eastside for medical and social service-(signalled in the Eastside Wellness Plan¹⁸⁶). **Wharekura (66)** stated that in Ngongotahā “Our kura and medical centre are at capacity now.”

11.5.11 Open Space

Student¹⁸⁷ Workshop Feedback was that they would like more ‘green’ open space in the future. **Student¹⁸⁸ Workshop Feedback** was that more parks and reserves will be required. **Facebook¹⁸⁹ Feedback** was that more homes and higher density should “equal more public space” and Council needs think outside of the box in this regard. **Eckersley (31)** stressed that Council must not build on reserves. **Te Arawa Climate Change Working Group (105)** supports increasing access to a public Open Space Network (Page 48 of the draft FDS), improving the quality of the open spaces and finding room for new open spaces. **Bennett (96)** supported upgrades to open space and focusing on those areas most in need of open space improvements such as more deprived communities, and areas with existing poor quality open space. **Dillion (90)** stated that in terms of the Westside Priority Area better and additional open space are acknowledged as necessary when intensification of

¹⁷⁹ Toi Ohomai Mokoia Campus, Rotorua (carpentry and electrical students)

¹⁸⁰ Rural Area- (Otaramarae south to Rotomā) Pre-engagement

¹⁸¹ Zanne

¹⁸² Morrow

¹⁸³ John Paul College (Year 11 and 12 students)

¹⁸⁴ Toi Ohomai Mokoia Campus, Rotorua (carpentry and electrical students)

¹⁸⁵ Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

¹⁸⁶ [41036fcabe426dd36dc81ebd3a097dbf_210923_RLC_Final_Eastside_Wellness_Plan_Web.pdf](#)

¹⁸⁷ Rotorua Boys High School (Year 12 and 13 students)

¹⁸⁸ John Paul College (Year 11 and 12 students)

¹⁸⁹ Wootten

residential areas is proposed. This submitter indicated that this is however contradictory to the approach of the previous council, which advocated for intensification alongside a reduction in open space provision. The submitter stated that this change in approach needs to be justified.

11.5.12 Sports Facilities/ Recreation

Facebook¹⁹⁰ Feedback was “so where are the sports fields for all our local community sports clubs, places that provide a hub for all of the community to come and be a part of...” and “Sport has become a profession in a lot of different codes so perhaps equally, there’s economic growth and opportunity for our city to thrive through this pathway as well...” **Page (45)** stressed that the community needs more sports facilities that are affordable and available, indoor and outdoor. The submitter indicated that we need to include facilities in Council’s plans. **Pene (8)** stated that an audit of our sporting facilities is in order. For example, the Sportsdrome is now over 60 years old and no longer fit-for-purpose and the neighbouring Energy Events Centre is primarily a conference, show, and exhibition centre. **Sport Bay of Plenty (80)** urged Council to consider the above insights from the Neighbourhood Play Systems:¹⁹¹ assessment in its decision-making process. These submitter stated that insights from the study support the retention of these reserves in whole for the purposes of nurturing and improving play opportunities for the local community. The study also indicates the loss of open space in this community would compound the limited play and recreation opportunities in this area¹⁹².

McFarlane (32) stated “as someone who works in the sports field trying to get more of our communities engaged in healthy activities and belonging to clubs with positive environments and values that enhance lives, it is wonderful to see sporting hubs included in this plan.” **Sport Bay of Plenty (80)** stated that a potential sport and recreation hub in Ngongotahā with final locations for new and upgraded facilities still warranting further investigation and discussion. **Student¹⁹³ Workshop Feedback** was that the provision of a motocross track and stadium would be important for their future. Further **Student¹⁹⁴ Workshop Feedback** was that a bike jump park, theme parks, gyms, waterparks, skate parks, basketball courts and playgrounds and an art gallery in the central area would be desirable for the future.

11.5.13 Safety and Policing

Iwi¹⁹⁵ Aspirations Hui Feedback was that Council should be considering the capacity of policing. **Liz (37)** asked if the government will provide more police and safety measures to cater for the growth. **Student¹⁹⁶ Workshop Feedback** was that it is important for them to have a safe environment in the future and further **Student¹⁹⁷ Workshop Feedback** was that Fenton Street should be made less dangerous. **Sinclair (54)** stated that safety is an increasing issue for residents as petty crime, harassment, and social behaviour has already led to discontent across the Glenholme area.

¹⁹⁰ Savage

¹⁹¹ According to the submitter: In 2021, Sport Bay of Plenty supported a comprehensive play assessment of Western Heights and Aorangi Primary Schools and the surrounding community. The purpose of the study (known as the Neighbourhood Play Systems project) was to help determine how local organisations, schools and community groups could work together to co-design play projects that will suit and benefit the needs and aspirations of the local school community.

¹⁹² According to the submitter: There are limited place spaces- Three of the identified reserves (Turner Drive, Park Road and Steeles Lane) fall into an area in Western Heights surrounded by three primary schools, three early childhood facilities, an intermediate school and a college. Each of these school grounds is currently closed for community use out of school hours, which limits access to open space for tamariki and whānau who live in the area.

¹⁹³ Rotorua Boys High School (Year 12 and 13 students)

¹⁹⁴ Rotorua Intermediate (Year 7 and 8 students)

¹⁹⁵ Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

¹⁹⁶ Rotorua Intermediate (Year 7 and 8 students)

¹⁹⁷ John Paul College (Year 11 and 12 students)

11.5.14 Other Facilities

Iwi¹⁹⁸ Aspirations Hui Feedback was that the urupā (Cemetery/burial site) is currently at capacity and this is a concern in the context of growth.

¹⁹⁸ Central Area (Ngongotahā to the Puarenga Stream) Pre-engagement

12.0 Strategic Approach

12.1 General Support for the Approach

Ministry of Housing and Urban Development (74) stated that FDS follows a logical, well thought out, thorough approach¹⁹⁹. It was further stated that they support how the FDS directs spatial growth and sets the conditions for the longer term in terms of enabling new housing and providing for the supply thereof. The submitter also indicated support for the flexibility of the FDS to respond to different needs, including allowing for a phased approach to growth. **Waka Kotahi (77)** stated that the FDS is a solid framework for Rotorua to grow in a way that supports the Council's strategic goals. The submitter also supports alignment with the strategic priorities of Government's Policy Statement on Land Transport, and in particular the focus placed on improving safety, reducing emissions, increasing mode shift, and improving journeys for freight.

Kāinga Ora (75) stated that it is generally supportive of the approach taken by the FDS. **Rotorua Business Chamber (76)** supported the long-term visionary perspective of the future. **Rotorua/ Taupō Federated Farmers of New Zealand (82)** outlined that it is "a comprehensive FDS for consultation" and that the FDS is a valuable tool to direct growth while balancing economic and environmental considerations. **Toi Te Ora Public Health (108)** stated that from a public health perspective they consider that the FDS is heading in the right direction. **Lake Okareka Community Association (LOCA) (86)** stated that the change in development proposed here is both evidence based and better considered in the planning process (i.e. less surprises). **Sigma Consultants Ltd (94)** indicated that the overall the approach of the FDS is supported. **Summerset Group Holdings Limited (88)** supports, through the FDS, the planning for future growth and investment in Rotorua's urban areas to enable the delivery of high quality and affordable housing, in an efficient and effective manner that contributes to a well-functioning urban environment, while promoting the social, economic, and cultural wellbeing of its communities now and into the future.

The Good Grocer (87) supported the direction and guidance that the Council is providing through the FDS specifically in relation to the growth aspirations for Ngongotahā but also in the spatial planning for the town centre with respect to such things as connectivity, environmental factors and recreation opportunities. All of these things are integral to a well-functioning community.

12.2 Alternative Approaches

Kāinga Ora (75) was supportive of the mapping of opportunities and constraints and further supportive of focus on intensification of existing urban areas (through PC9), however states that while the need for greenfield is understood, high density areas should be staged around the City Centre and surrounding urban areas before providing for greenfield growth in Ngongotahā and Ōwhata (in line with NPS-UD 2020 regarding accessibility). **Dillon (90)** alternatively indicated that the economic viability of apartments around the city centre has not been demonstrated through the draft FDS, nor through PC9 on which the draft FDS is based. The submitter stated that economic reports supporting PC9 themselves question the validity of such higher densities in Rotorua. The submitter then noted that in a case like Rotorua, it is very likely that development will instead disperse to the outer suburbs where land and building costs are lower. He indicated that it is further likely that only government entities such as Kāinga Ora will have the particular funding available to make this form of development work in close proximity to the city centre. The submitter claims that much of the existing greenfield has been available for some time but is unlikely to be realised because of infrastructure constraints

¹⁹⁹ According to the submitter: MHUD has been engaged in the process to develop and test the scenarios for Rotorua's and "feels it has been a positive experience"

or landowner inertia. The submitter then stated that additional new greenfield land needs to be identified to compensate.

Grace (106) stated that growth/ future development in Rotorua should not be supported at all. The submitter noted that Rotorua is situated in an active geological area with the potential for future volcanic eruptions. The submitter highlighted that a larger population would put more people at risk. In this regard she stated “consider the furore over the White Island eruption”. The submitter further outlined that the city is also getting too congested and any further growth will make the situation worse. The submitter stated that Rotorua would also lose its small town feel and went on to state that there needs to be a country-wide plan for where future development should take place. The submitter indicated that there are a number of smaller towns in New Zealand with declining populations that are located away from geologically active areas that would benefit from being rejuvenated.

Dillon (90) stated that it would have been preferable to have referred to the health of Lake Rotorua as ‘front and centre’ of how Rotorua city develops, and work back from that. **Lakes Water Quality Society (LWQS) (81)** urged RLC to consider the fundamental importance of the lakes (the economic, social environmental and cultural benefits) they provide (rather than overly emphasise the HBA 2021). **Te Arawa Climate Change Working Group (105)** stated that consideration must be given to the fact that Rotorua’s FDS is a ‘growth’ strategy in a time of climate change requiring ‘degrowth’ to ensure the survival of future generations, the prevention of biodiversity collapse, and the sustainability of our natural resources. **Te Kotahi a Pikiao (3)** stated that they appreciate the FDS exercise was urban focused but would like to encourage RLC to engage with Ngāti Pikiao to undertake a similar exercise across their rohe. Papakāinga, environmental protection/ enhancement, enhancement/ protection of sites of cultural significance and economic development opportunities would be their initial interest.

12.3 Outcomes

Toi Te Ora Public Health (108) stated that they recognise that many of the FDS’s outcomes relate to health and well-being outcomes- more specifically the recognition of the environmental well-being and community well-being. The submitter states that they consider it progressive of RLC to also aim to have the general health and wellbeing of their community addressed as a focused outcome alongside the key fundamentals that lead to it. **Bennett (96)** stated that equity should be added as an outcome, noting that Rotorua has significant socio-economic inequities with some communities doing well, and others experiencing significant deprivation. Children, young people and Māori are overrepresented in groups that are struggling. The submitter emphasised that socio-economic deprivation is strongly linked to poorer health outcomes. The submitter also indicated that the outcome of partnership should be included in the FDS outcomes. According to the submitter this is an important principle arising from Te Tiriti o Waitangi. The submitter stated further that including ‘partnership’ in the outcomes will ensure that collaboration with Te Arawa continues in the governance, delivery, and monitoring of the FDS. The submitter finally requested that health perspectives be kept in consideration alongside economic, environmental, and social concerns in the FDS.

Te Arawa Climate Change Working Group (105) expressed specific support for the outcome focussed on the protection and enhancement - The *‘wellbeing of our taiao is connected to the wellbeing of our communities. We are committed to protecting and enhancing our environment.’* However the submitter indicates that Te Arawa oppose the use of a “protection assumed framework” for the current Taiao because the environment is not yet restored and this should be initial focus.

Te Kotahi a Pikiao (3) disagrees the outcome statement “a strong economy provides opportunities for our people to thrive.” The submitter would prefer revised statements like a sustainable and holistically conscious economy provides opportunities for people to thrive. The submitter states that this comment is made because

it is their experience over the past 150 years that economic growth does not necessarily translate to thriving, meaningful and holistic lives. The submitter further noted that economic growth has been both a driver and exasperator of environmental decline hence the eagerness to shift thinking about what type of economy truly provides for thriving, meaningful and holistic lives.

Searancke (11) recommended the inclusion of an overarching statement that speaks to how the inevitable tension and conflict between the /outcomes will be resolved? The submitter noted that this requires confirmation of "the common good", and perhaps a statement concerning the hierarchy of the outcomes. The submitter indicated that this may be best captured in a vision or purpose statement- "the simpler the better!" For example: "To facilitate human prosperity via belonging in Rotorua (home ranges, home bases, paths and places etc.)"

12.4 Demand and Capacity

Ministry of Education (78) stated that it is acknowledged that provision is made for significantly more development capacity than is required to meet demand and to provide greater market with choice. The submitter however, as previously mentioned, noted that it is likely that by providing for such significant amounts of greenfield growth (which includes rural-residential growth), there will be little incentive for infill/intensification to occur in the short-to-medium term. The submitter then cautioned that this would ultimately undermine the compact city outcome the FDS is trying to achieve. **Wylie (21)** stated that it would be good to plan just for demand (i.e. where supply meets demand). The submitter noted that we should "not build and then fill these homes with people from other towns/ countries, just because we have the availability." **Facebook²⁰⁰** Feedback alternatively was that the City isn't growing at all. **Skilling (39)** reasoned that the Rotorua population is decreasing so according to the submitter there is no need to build houses for the homeless.

Dillon (90) noted that in terms of the 'Growth Picture' growth is over-estimated in at least the short term, as it is based on near recent growth, which is considerable in contrast to the long run growth for the District. In terms of industrial capacity he stated that the 'Peka Block Industrial Area' has been zoned industrial for some time, but the leasehold status and significant development costs have limited any realisation to date. The submitter pointed out that at least part of this area should be subtracted from the available industrial land. **Sigma Consultants Ltd (94)** pointed out that the HBA includes a 'latent demand' figure of 1500 additional homes. The submitter notes that this figure identifies the current unmet demand for housing but is difficult to quantify. The submitter indicated that to their understanding few if any other Councils have used this figure in their initial HBAs. The submitter mentioned further that the collective impact of these assumptions on the overall figures quoted should be acknowledged clearly.

Dillon (90) stated that to enhance the robustness of the draft FDS, the spatial scenarios examined need to be included upfront in this document. He stated further that in terms of residential capacity- This should be recalibrated under at least an additional scenario for the potential removal of such high levels of infill.

Drop-in²⁰¹ Session Feedback was that the statistics and the figures used as the evidence base for the HBA and FDS are questionable. **Quinn (38)** states the FDS document is confusing and lacks clarity. According to the submitter it does not align with Government statistics with respect to population growth. **Save Glenholme (50)** and **Cameron (67, 69)** questioned the statistics used in the FDS that predict future growth. The submitter believes that there needs to be clear evidence of job growth before any further residential intensification takes place. **Haley (70)** claims that Council has used figures to address housing needs in the future that have been obtained from consultant's reports and that these figures used appear to be highly inflated. The submitter

²⁰⁰ Renata Ward

²⁰¹ Westside

believes Council has ignored the figures of Statistics New Zealand that show the Rotorua population has decreased and is more than likely to decrease further, or at the very least remain static.

13.0 Growth Locations from Submissions/ Feedback

This section addresses additional FDS growth locations/ site considerations raised either through feedback or submissions. Consider the separate pdf A3 map attachment for this section.

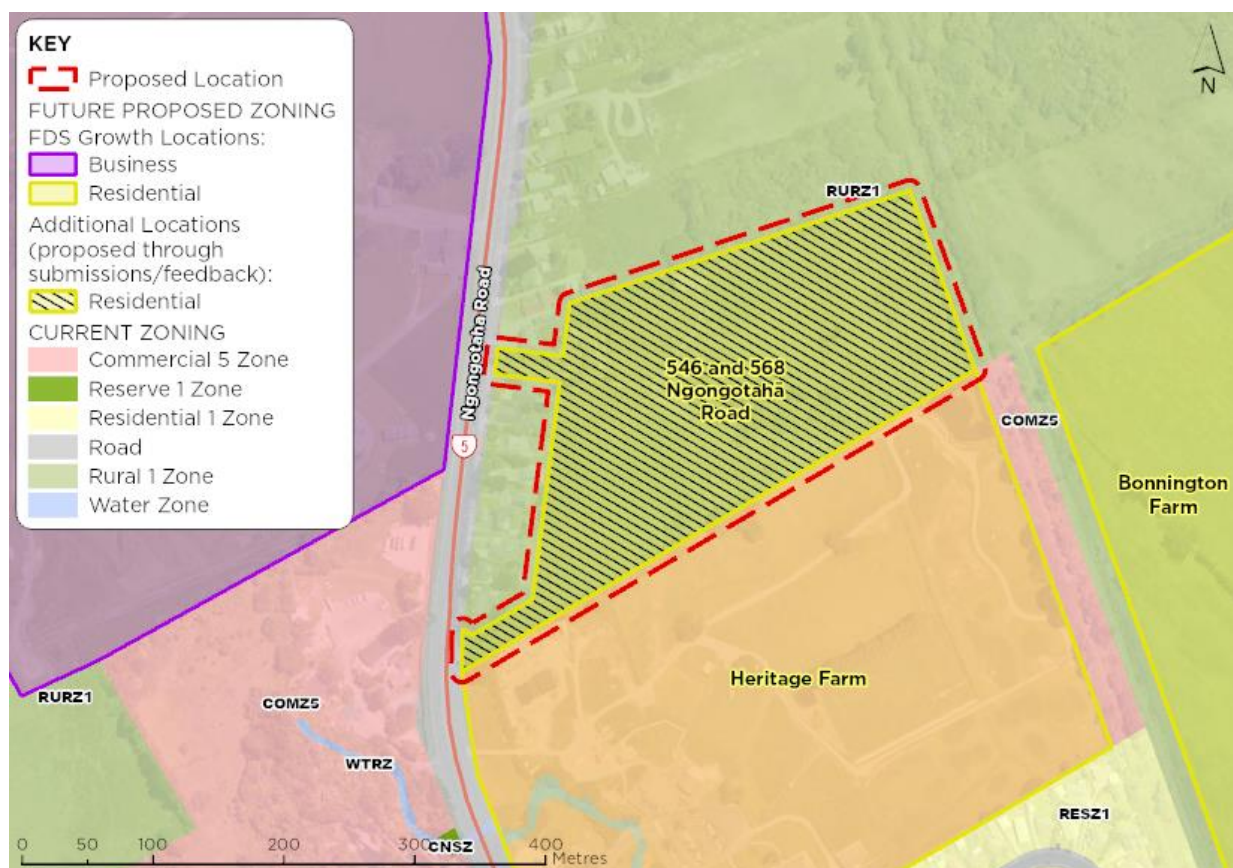
13.1 New Proposed Residential (Res. 1/ Medium Density)

13.1.1 546 and 568 Ngongotahā Road (91)

(Proposed through submission - See '546 and 568 Ngongotahā Road' on map below (hatched site) and the attached map)

546 and 568 Ngongotahā Road (91) seeks that the site at 546 and 568 Ngongotahā Road is included in the FDS. The site is 6.2ha in size and is zoned Rural 1 under the Operative Rotorua District Plan. The submission seeks that the Committee include the site as a potential new residential area (short to medium term) for greenfield residential development, within the Westside priority area of the FDS.

The submission includes a high level assessment as to how the site in question is able to achieve a number of the key outcomes sought in the FDS. The submitter believes that the site does not appear to have any significant growth constraints however there are some potential “go carefully” constraints such as natural hazards, biodiversity and highly productive land that will need to be considered.



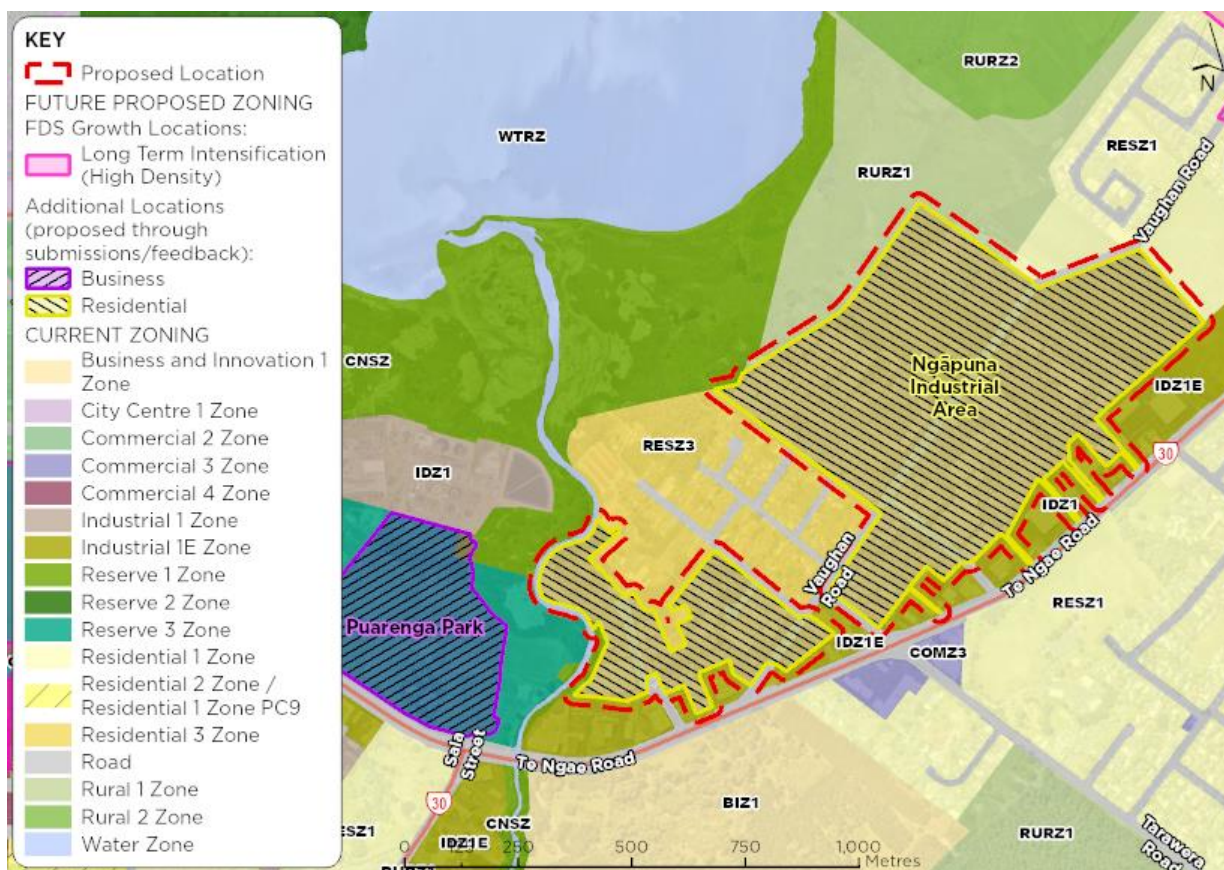
Map showing the 546 and 568 Ngongotahā Road Site as future residential

13.1.2 Ngāpuna

(Proposed through feedback²⁰² - See 'Ngāpuna Industrial Area' on map below and the attached map)

The FDS proposes to encourage “the relocation of existing industrial processing activities in Ngāpuna and Fairy Springs and transitioning to a mix of more compatible commercial and mixed-use activities over time”. Although they were supportive of Council’s intention to encouraging the relocation of industry, the community at the Eastern Area (Tikitere to Ngāpuna) FDS Pre-Engagement- Iwi Aspirations Hui did not support the envisaged transition of the Ngāpuna Industrial Area to commercial uses even if this deemed a more compatible use.

Iwi²⁰³ Aspirations Hui Feedback was that the community would like landuse to transition from industrial to residential for Ngāpuna Industrial Area. The community do not want their residential growth to be limited and ‘boxed-in’ by commercial activity (i.e. they don’t want the current residential area- the cultural village, to be surrounded by commercial landuse, as proposed in the FDS). The community therefore requested that the proposed future zoning for the current industrial area be long-term residential (medium density). The community did however express concern about the implications of potential contamination of sites in the Ngāpuna Industrial Area if the transition were to occur.



Map showing the Ngāpuna Industrial Area as future residential

²⁰² Eastern Area (Tikitere to Ngāpuna) Pre-Engagement- Iwi Aspirations Hui

²⁰³ Eastern Area (Tikitere to Ngāpuna) Pre-Engagement- Iwi Aspirations Hui

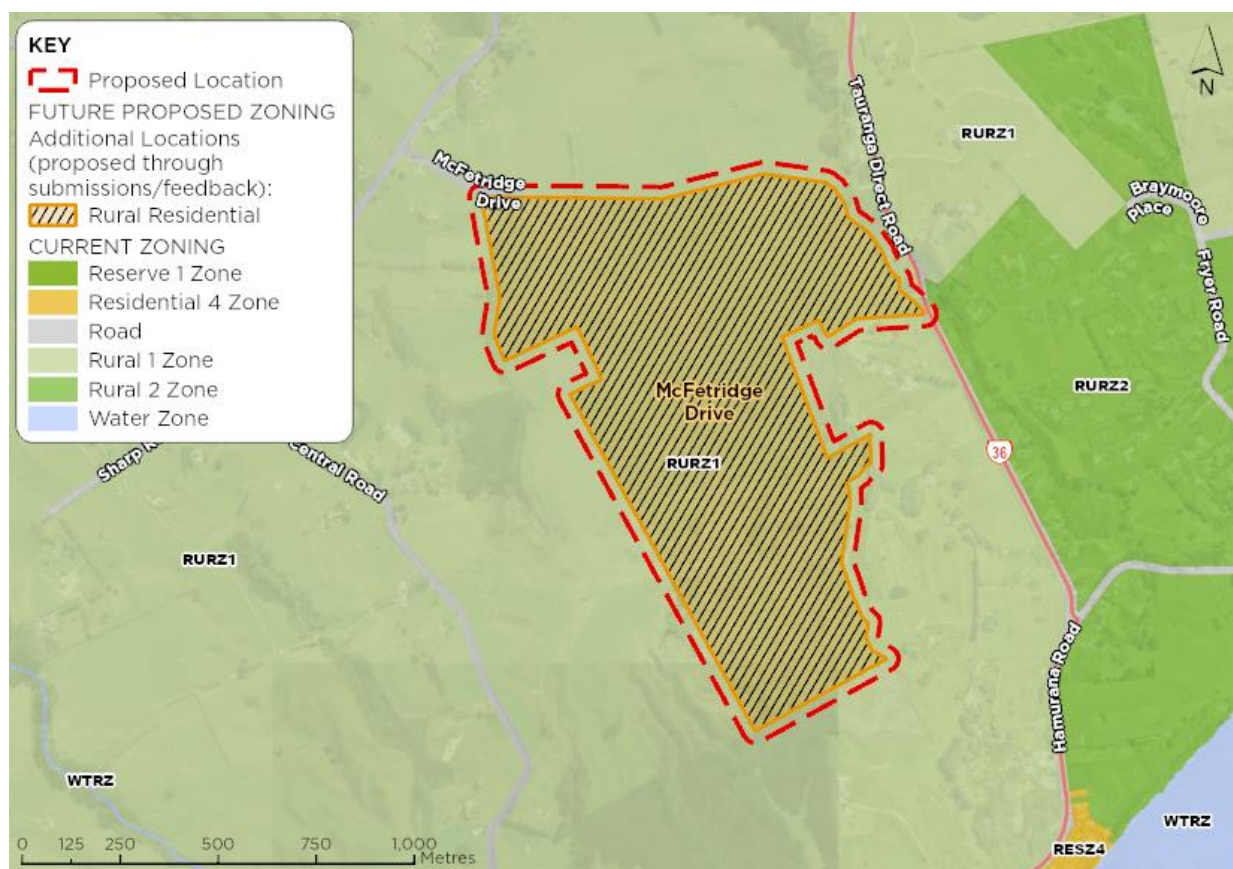
13.2 New Proposed Rural Residential

13.2.1 McFetridge Drive

(Proposed through submission - See 66 McFetridge Drive on map below and the attached map)

66 McFetridge Drive (92) requested that the properties located at 66 McFetridge Drive and 89 Tauranga Direct Road be included in the Rotorua Lakes Council's FDS as a rural residential development area. The submitter requested the adjustment of various 'growth area technical assessment' scores pertaining to these properties²⁰⁴, and that regard is given to the additional information, provided in the submission so these properties are included in the FDS, as a greenfield rural residential development area.

The submitter has therefore requested the reassessment of the properties²⁰⁵ taking in to account the work that has already been undertaken to create 88 additional lots, a total of 91 lots.



Map showing the 66 McFetridge Drive Site as future rural residential

²⁰⁴ 66 McFetridge Drive and 89 Tauranga Direct Road

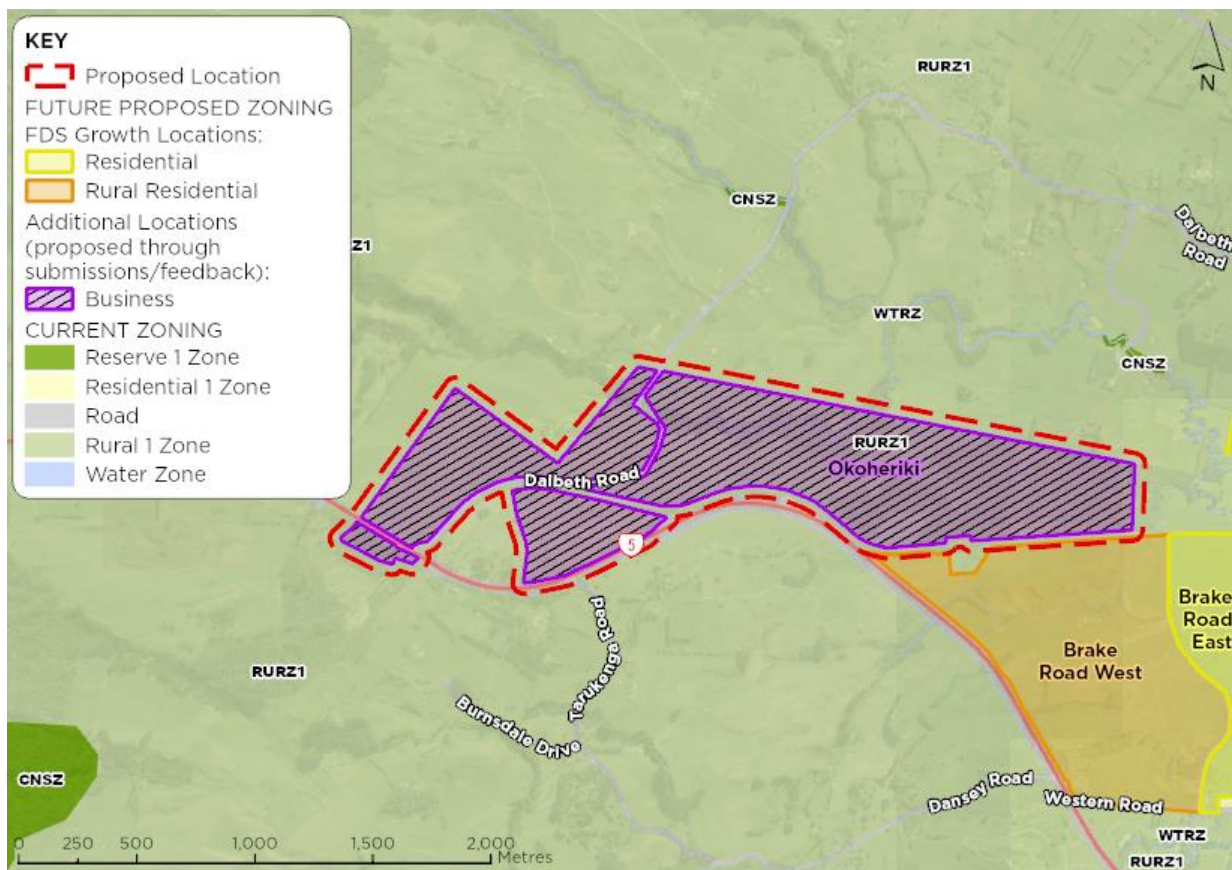
²⁰⁵ According to the submitter: This submission pertains specifically to the property assessed on McFetridge Drive (noted as Road in the technical report), north of Ngongotahā, on the SH36 corridor - 66 McFetridge Drive & 89 Tauranga Direct Road. The land referred to is legally described as Lots 7 & 8 DP 392696 and Lot 2 DP 558193 and comprises an area of 83.2572ha.

13.2 New Proposed Business

13.2.1 Tura Ngakau me Ngati Whakaue ki Ngongotahā (95)

(Proposed through submission - See 'Okoheriki' on map below and the attached map)

Tura Ngakau me Ngati Whakaue ki Ngongotahā (95) supported the FDS where it is proposing to encourage the relocation of industrial development from the Ngongotahā Village and convert potentially zone it to high-density residential in the long-term. However, the vision²⁰⁶ by submitter is to have this as a short-to-medium term outcome rather than a long-term outcome- as indicated in the FDS. The submitter recommends the site shown in the map to be an appropriate location for heavier industrial development (and relocation from Ngongotahā) as it is further up State Highway 5 near the intersection with Dalbeth Road. The submitter highlights that there are a number of "Okoheriki" blocks of land that would be more suitable for industrial development. The submitter states further that this land has easy access to State Highway 5 from Hamilton; easy access to rail (if ever re-started); and that the Tarukenga substation is nearby, so it has access to significant power. It is also located less than five minutes out of the Ngongotahā Village for easy employment opportunities and accessibility. The submitter states further that the land is easily able to be screened from State Highway 5 and neighbouring rural property owners to ensure it does not visually dominant this area, or become visually unappealing.



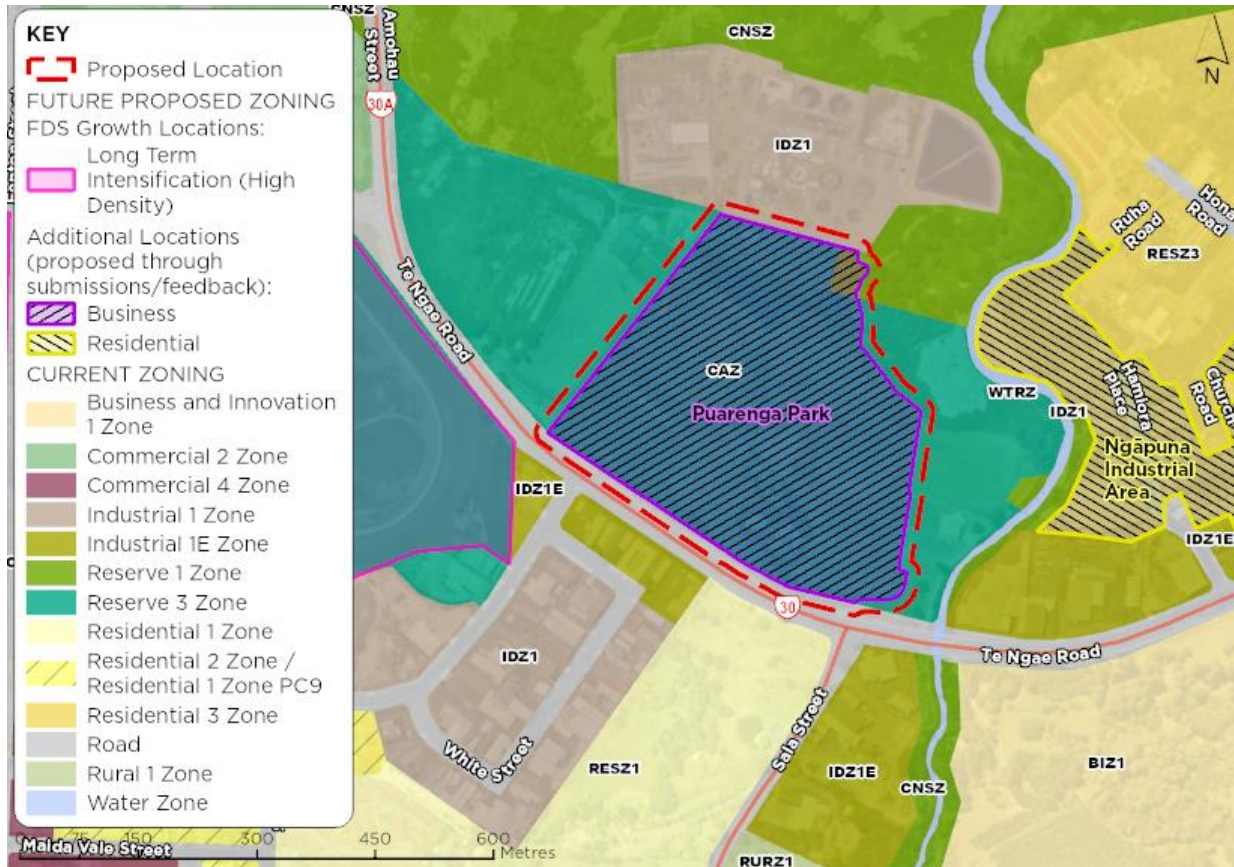
Map showing the 'Okoheriki' Site as future business

²⁰⁶ According to the submitter: The vision by the submitter is to have this as a short-to-medium term outcome, rather than a long-term outcome as indicated in the FDS. It is the long term vision of the submitter to revitalise the Ngongotahā village. One of the key objectives of the submitter is the removal of the heavy industrial activity located within in the centre of the village along Tauhi and Wikaraka Streets. This industrial zoned land and its industrial businesses is surrounded by residential development to the north, south and west. Their vision also includes a supermarket and shops to service the wider Ngongotahā community, rather than having to rely on Rotorua city itself. The rail land and land west of the rail land (north of Tauhi Street) has been identified for this commercial development

13.2.2 Puarenga Park- Nelson 42)

(Proposed through submission - See 'Puarenga Park' on map below and the attached map)

Nelson 42 recommended that the Puarenga playing fields are converted into light industrial. No rationale for choosing this site was provided in the submission.



Map showing the Puarenga Park as future business

13.2.3 Charles Road

(Proposed through feedback²⁰⁷ - See 'Charles Road' on map below and the attached map)

The Rotorua Airport²⁰⁸ has asked that the area reflected in the map below (northern corner of Lee Road and Te Ngae Road, including Alfred and Charles Roads) be considered as a future long-term business (industrial) growth area in the FDS. This area is currently zoned and used for residential purposes. Due to its strategic location between SH30, the airport and the planned Airport Business Park the Rotorua Airport recommends that this area is identified as long term business in the FDS.



Map showing the Charles Road Site as future business

13.3 General Reference in Submissions to Potential Growth Locations

Stace (100) stated that there is a large area of undeveloped land between Ngāpuna and Owhata, and between SH30 and the lake, which has no proposed development zoning, and is even excluded from the urban zone. The submitter indicated that area should be zoned for medium to long term new residential and reserves (including Owhatiura Hill), and brought within the city limits. The submitter stated that another area to consider is the undeveloped area lies between Kawaha Point and Ngongotahā, between SH 5 and the lake, which has no proposed development zoning and is outside the urban zone.

Moore (103) stated that lifestyle development (of smaller lots 2-8 hectares) could be considered around residential and industrial zones i.e. Keith, lower Dansey, Darbeth and Oturoa Roads- that can be serviced by a ride on mower.

²⁰⁷ Feedback from the Rotorua Airport

²⁰⁸ [Gateway to the Bay of Plenty and central North Island. | Rotorua Airport \(rotorua-airport.co.nz\)](https://rotorua-airport.co.nz)

Te Kotahi a Pikiāo (3) stated that Mourea is a settlement on the Rotorua Lakes on a thin strip of land between Lake Rotorua and Lake Rotoiti, on State Highway 33. The submitter stated that it should be considered as the gateway between the coast (Tauranga) and the country i.e. Rotorua and its thermal attractions. The submitter stated that Mourea is zoned Rural A and therefore the number of buildings on a 1000 m² of land is limited to one. This is problematic for those intergenerational Maori homeowners who have lots of land but can only live in one consented dwelling.

Leonard (24) indicated that Mamaku should be considered for growth and cheaper housing due to the fact that it is a high lying area. The submitter stated this area should be a viable option for growth and cheaper housing.

Pene (20) stated that they have land surrounding the Hinemihi Marae that is suitable for housing but that the marginalized community have never been able to afford the infrastructure i.e. roading, water, sewerage, and electricity

Lincoln (29) stated that there are areas along the main arterial routes in and out of Rotorua, where land is not being used for anything productive. The submitter stated that Vaughan's Road still has areas that could be flood proofed and used for more new residential areas. The submitter indicated that Fairy Springs Road has a large amount of land opposite the Kauae cemetery. The submitter also noted that Holden's Bay and Hannah's Bay have room for new homes to be built and the area between Holden's Bay and Owhata on the Lake side has a large area of unused land.

Dillion (90) stated that industry needs to be separated into dry and wet industry, and locations dictated dependent on infrastructure and available water. He then indicated that industrial expansion should be focused on SH5 on route to Hamilton, to benefit from the improved travel times and 'greater accessibility' provided by the Waikato Expressway

Keyworth (1) stated that business should be located South near Horohoro

Lincoln (29) indicated that just past the Hemo Gorge should be considered for an industrial area (where the old Waipa village used to be located)

14.0 Implementation and Monitoring

14.1 Partnership and Decision Making

Rotorua Business Chamber (76) stated that section 10 needs to include business people in the 'partners' list. **Ministry of Education (78)** highlighted that they wish to work with RLC on planning in Ngongotahā and the Eastside. They further indicated that there may also be other educational requirements that result from the additional development, such as in the Westside, and this will be understood in more detail as Structure Planning is undertaken. **SmartGrowth (79)** noted that the governance groups of SmartGrowth and Futureproof have formally resolved to work together to have an agreed transport package of priority works that require funding and engagement with relevant Ministers. The submitter stated further that SmartGrowth 2023 will likely seek a similar approach, to work with Rotorua and Eastern Bay of Plenty, and suggest that this action be included in the FDS's Implementation Plan. The submitter requested that RLC participates in engagement concerning the finer grained investigation and feasibility assessment associated with the SmartGrowth Industrial Land Study and that there is regular dialogue between Rotorua District and SmartGrowth be included in the Implementation Plan. **Toi Te Ora Public Health (108)** stated that going forward they see scope for Toi Te Ora Public Health to play a pivotal role in collaborating with RLC and other stakeholders in and around further implementation of infrastructure and planning.

Bennett (96) asked that a partnership²⁰⁹ with Te Arawa be instituted for the design, implementation, monitoring and governance of the Rotorua FDS. A partnership would encourage co-creation; visibility of whakapapa and identity; expression of values; and for traditional roles and practices in relation to the environment to be upheld. **Te Arawa Climate Change Working Group (105)** emphasised that under the Local Government Act 2002, RLC must have processes specifically providing for Te Arawa hapū to contribute²¹⁰ to decision-making; and must plan for how to support Māori capacity to contribute. The submitter emphasised that in terms of implementation of the FDS the obligations of RLC to Te Arawa under the Local Government Act 2002 must be fulfilled by RLC enabling and resourcing²¹¹ processes specifically providing for Te Arawa hapū to contribute to decision-making in preparing and actioning the supporting Implementation Plan that will sit alongside the FDS. **Drop-in²¹² Session Feedback** was that mokopuna need to be engaged and involved in the decision making and that involving the community ensures a sense of ownership and responsibility. Further feedback was that Progress Ngongotahā are keen to establish a collective to assist the development and implementation- this was supported by those in attendance. **Putaranui (68)** requests that the Executive Committee of Ngongotahā Sports and Community Association Inc. formally request that a representative be present at all development strategy meetings for the Ngongotahā area.

²⁰⁹ According to the submitter: Much of the city is built on land of ancestral significance to Te Arawa

²¹⁰ According to the submitter: When RLC is making significant decisions, it must take into account the relationship of Te Arawa, our culture and traditions with our ancestral lands, water, sites, wāhi tapū, taonga species and rauemi. Despite these obligations under the Act, RLC worked with other councils in the Bay of Plenty yet failed to work with Te Arawa hapū and iwi in the development and drafting of the FDS. Consultation involving council asking iwi for feedback on council plans and actions is not a process providing for iwi to contribute to decision-making! Implementation Plan (Page 64 of the draft FDS)

²¹¹ This must include a specialised audit and external advice project that would identify the current leanings and biases that RLC does not realise it complies with regard to only partially understanding and engaging te ao Māori and leaning to engagements of convenience.

²¹² Ngongotahā

14.2 Growth Management- Timing/ Staging of Development

Just over half (52%) of the online survey submitters support the timing/ staging of the growth areas outlined in the FDS.

Sigma Consultants Ltd (94) supported the inclusion of information outlining timing, but noted that Plan Change 9 appears to be out-of-sync with this. The submitter outlined that it would be preferable for the FDS to be confirmed in order to inform the staged implementation of changes to the District Plan to provide more realistically to achieve progressive intensification over the 10 to 30 year timeframe. **Ministry of Education (78)** requested that the staging/ phasing of development to be more conducive to facilitating a wide range of housing options and consider prioritising existing greenfield, as well as infill/intensification options, before releasing new greenfield areas beyond the existing zoned greenfield areas. **Waka Kotahi (77)** requested that RLC reconsider the release²¹³ of the extent of land for greenfield growth, especially in early years, as it will likely reduce the demand for growth through intensification. The submitter emphasises that less land needs to be considered for development in the short-medium term for Ngongotahā. Waka Kotahi has in recent years invested in improvements to SH30 to support growth and freight movements along this corridor.

Sport Bay of Plenty (80) stated that the extent and timing of growth in Ngongotahā is questioned: a. The Housing and business development capacity assessment (HBA), identifies growth in Ngongotahā of around 780 dwellings over the 30-year period of the strategy. Yet the draft Strategy identifies enough greenfields land for approximately this amount of development in the first development period (the short-medium term), with additional greenfields land identified in later²¹⁴ stages. The FDS Economic Assessment found that there was sufficient rural lifestyle land for the 30-year period of the strategy. Yet the draft Strategy identifies new land for rural lifestyle development along the western edge of Ngongotahā. Even if further land is required for rural lifestyle development, this is not needed in the short-medium term identified in the draft Strategy, and should be pushed back. **Wharekura (66)** however stated that there is a mismatch on timing between business and residential growth. The submitter stated further that you need the business first to encourage the people to relocate to the residential. There are great examples in Western Bay and Waikato where infrastructure and industrial go first, “seemingly miles from anywhere and then slowly the infill housing sets in.”

Ministry of Education (78) pointed out that a clearer indication of staging and priorities on Map 19 will assist to understand the timing and quantum of growth in Ngongotahā. The growth indicated in the draft FDS will place additional pressure on schools in the Eastside, which will require further investigation and planning. The staging and timing of development will need to be carefully understood to inform Ministry decision-making on future educational requirements. **Waka Kotahi (77)** urged that Council investigate not just how greenfields growth should be controlled, but also how intensification can be encouraged (i.e. incentives for intensification, especially in or near the city centre). **Kāinga Ora (75)** requested that RLC articulate how growth will be supported over the next 10 or 20 years (most likely scenarios) and indicate what the implications on Council infrastructure is (if growth is delayed or brought forward). **Toi Te Ora Public Health (108)** noted that within the timing and staging of development, it would be advantageous for the council to identify how it can create short and effective timeframes so that access to parks/green space, the natural environment and healthcare services are not impeded or reduced for newly developed community and its residents. This is particularly, and more importantly for the people most vulnerable in our community, such as elderly, new-borns and parents, and disabled persons. We suggest that this should also be a key priority within the Public Open Space Network.

²¹³ According to the submitter: Given the need to review the FDS every three years and prepare a new one every six years, there is the ability to monitor greenfields land uptake and bring forward the release of areas if required.

²¹⁴ According to the submitter: This is on top of any additional development that occurs within the existing Ngongotahā urban area.

14.3 Responsive Planning

Ministry of Education (78) stated that the current approach to responsive planning as set out in the draft FDS is unclear. The submitter notes that given the significant amount of development capacity already provided for above the required development capacity to meet demand and a margin, being responsive to even more capacity will need to be carefully scrutinised to ensure the outcomes of the draft FDS can be met. It can be difficult for providers of additional infrastructure to plan or respond to out-of-sequence or unanticipated development so a robust process for consideration of such proposals would be helpful. The submitter proposed that the Council develop a stronger policy approach to address of out-of-sequence or unanticipated development, potentially with reference the Bay of Plenty Regional Policy Statement Proposed Plan Change 6 criteria (Policy UG7A), to provide more certainty as to how some development areas may come forward or be prioritised above others. The submitter stated that the impact on additional infrastructure needs to be carefully considered when reviewing out-of-sequence or unanticipated development proposals

14.4 Implementation Plan for Delivering Development

Te Arawa Climate Change Working Group (105) stated that Te Tūāpapa o ngā Wai o Te Arawa and Te Mana o te Wai (as part of the National Policy Statement for Freshwater Management 2020) must be integrated into the framework, policies, systems and processes developed as part of the Implementation Plan that will sit alongside the FDS.

14.5 Priority Development Areas and Projects

Rotorua Business Chamber (76) supported the 'concentration' of the strategy into four sub-areas. **Waka Kotahi (77)** stated that Priority Development Areas should be renamed – Waka Kotahi does not disagree with the approach taken to include a more detailed perspective of each area but disagrees with the terminology being used describing them as being priority areas. The submitter pointed out that the areas cover the entire existing and future urban area which therefore according to the submitter, cannot all be priority areas. The submitter further recommended that the Council give consideration to showing these areas, or elements, differently based on the level of certainty around necessity and funding/delivery. For instance, the draft Strategy noted that plans have recently been progressed for the Eastside and that the draft Strategy implements and builds on this work, but that such level of work has not been undertaken for Ngongotahā. **Kāinga Ora (75)** stated that clarity is provided on how the projects in the proposed Priority Development Areas link to the funding in the Long Term Plan (LTP) and future funding requirements for infrastructure; and how they will be incorporated into funding cycles, plans and processes. **Ministry of Education (78)** noted that it would be preferable if short-term growth cells were identified so as to provide a clear picture of where immediate development opportunities exist. For example existing greenfield areas currently zoned and under development, and the Housing Accord Areas. The submitter stated that as part of implementation, further evaluations to prioritise the PDAs would be helpful

14.5 Structure Planning and Plan Changes

Ministry of Education (78) outlined that there may also be other educational requirements that result from the additional development, such as in the Westside, and this will be understood in more detail as Structure Planning is undertaken. The submitter stated further that the proposed development pathway, which would require structure planning before re-zoning and this approach should be retained. The submitter supports the use of structure planning to provide for integrated land use and infrastructure planning prior to rezoning. The submitter emphasises that rezoning for growth should not take place before the business cases for other infrastructure investment has been approved and funded to ensure integrated planning.

14.6 Monitoring

Sigma Consultants Ltd (94) outlined that ongoing review of the FDS and HBA will be important to understand the uptake of different typologies. Understanding geotechnical constraints will also support this. **Te Arawa Climate Change Working Group (105)** stated that Under the Local Government Act 2002, RLC must plan for how to support Te Arawa capacity to contribute to the collection, collation and sharing (or not) of data²¹⁵ relating to our hapū and papakāinga communities to inform decision-making. **Iwi²¹⁶ Aspirations Hui Feedback** was that for Ngāpuna to ‘move forward’, it is important to collate statistics of this area in order to develop a profile of the population demographics and housing ownership. This community indicated that the detail is needed in order to understand the current and future picture.

²¹⁵ According to the submitter: For example, while overall the Rotorua and New Zealand population may be aging, the local Māori population may look very different. With Māori making up 75% of the Rotorua community, it is difficult to understand RLC’s predictions that 75% of household growth will be in one person and couple households. Māori and Pacific Island whānau, who make up the majority of the homeless in Rotorua, require 4+ bedroom homes to cater for intergenerational and communal living. As it stands, the future development outlined within the FDS is happening to us, not with us.

²¹⁶ Eastern Area (Tikitere to Ngāpuna) Pre-Engagement

15.0 Proposed Editorial Changes

Editorial amendments to the FDS proposed through submissions and feedback are listed below²¹⁷:

Dillon (90)

- Provide Clarity on what is a FDS is. There should be discussion of how the 2018 Spatial Plan has been superseded and not been given effect to. In this regard it would be good to understand what has worked and has not, and how those learnings informed the FDS process
- Provide greater clarity on the steps in the FDS development process. No evidence was provided on the testing of the spatial scenarios with the community.

Kāinga Ora (75)

- Include references in the 'Regional Context Section' to SH36- an important freight route for the Port of Tauranga and SH5- a key route for supporting Waikato industries (not only tourism)
- Housing numbers referred to in the 'Growth Picture' need to be rounded (as they are likely to evolve and be reproduced in media outlets)
- Provide infographics or a range of housing scenarios to help the public understand how Council envisages 'high-density housing (Pg. 19- Rotorua Context).
- Define the word 'accessibility' as there is some ambiguity in its use (i.e. is it referring to access to the private and public transport network or referring to those with physical disabilities accessing services).

Waka Kotahi (77)

- We suggest this be amended as follows "providing for affordable and efficient transport between our centres and neighbourhoods" (Pg. 8)
- "At about 30 minutes from Ngongotahā " – This is inaccurate, a more accurate travel time is 40 minutes (Pg. 14)
- Currently the identification of bus routes on the transport map provides little context as to how the network operates. We consider that one improvement could be to differentiate corridors based on frequency so that stretches of routes where 2 or more services combine to create greater frequencies, such through the CBD, are thicker. (Pg. 47)
- The State Highway improvements shown on the transport map do not exactly match the 'key road upgrades/enhancements' shown on the Priority Development Area maps, primarily at the southern extent of SH5 (Pg. 47)
- "These smaller centres will serve an important local function and ensure that people can access their daily needs within walking distance, which will support our wider actions to reduce vehicle kilometres travelled." – The reference to "vehicle kilometres travelled in this sentence appears unnecessarily technical and could be replaced by something like the following: "which will support our wider actions to reduce vehicle kilometres travelled the amount people drive" (Pg. 52)
- The draft Strategy identifies the rail corridor quite prominently on most plans; however, this is not a functioning rail route, and there are no plans to reactivate it in future. As such it seems to have little relevance to the growth plans and the maps would probably benefit from either the removal, or the downplaying of this feature

²¹⁷ As it has been provided to RLC

Ministry of Education (78)

- The timeframes shown on Map 19 are also unclear. The NPS-UD defines short term as 0-3 years, medium term as 3-10 and long term as 10-30 years. Here however short-medium is defined as being within the next 10 years. Map 19 also includes a category for medium-long term development, which isn't defined in the NPS-UD.
- Where there is a pipeline of development already underway – for example in the existing greenfield areas under development, in the Housing Accord Areas, and areas where the IAF/shovel-ready funding is available, these could be indicated as being immediate priority areas and could be identified on Map 19 as such. The timing on Map 19 should be clarified to align with the NPS-UD definitions and to provide more clarity for infrastructure providers as to the relative priority of the various growth cells.
- Clarification of what 'medium-long' term development means would also be helpful.

Spark, Chorus, One NZ (formerly Vodafone), Connexa and FortySouth (83)

- Edit the FDS to recognise that the telecommunication sector was not consulted during the development of the FDS.

Sigma Consultants Ltd (94)

- A clear statement within the document is needed that sets out the main assumptions behind the demand figures to ensure this is clear to future users of the document.
- Amend- Section 5 as it identifies that a 'high growth' scenario has been used to predict demand for additional housing.
- This document will presumably be used to inform Council and external stakeholders' decisions, for example, funding decisions by Waka Kotahi, where there will be comparisons made between the likely future growth and demand, in different towns and cities- Ensuring that the assumptions made in growth projections are clear and located in one place is important.
- *Maps* - The colours on a number of the maps are difficult to differentiate from one another.

Transpower (104)

- National Grid lines need to be shown on specific maps in the FDS to ensure that the development capacity is correctly informed by the National Grid corridor rules in the Rotorua District Plan. See further detailed comments in relation to the "constraints on development" core content requirement in Appendix A to this document.
- A number of the assumptions regarding electricity supply (both transmission and distribution) need to be clarified²¹⁸ within the FDS before it is adopted. The FDS generally identifies the National Grid corridor that applies to existing lines but does not however map future lines. Transpower has no specific plans for new lines in the district, however they note that new connections are likely to be required within the life of the FDS and significant upgrades are required for the Western Bay of Plenty.
- The FDS needs to include policy support for electricity infrastructure that may occur within or beyond Rotorua to support load growth and electrification.
- The National Grid needs to be added to a number of the maps within the draft FDS alongside state highways and rail to ensure that its national and regional significance is appropriately recognised and taken in to account.

²¹⁸ According to the submitter: Transpower are happy to facilitate further consultation between Council, Unison and Transpower to enable the details to be discussed and recorded accurately, including any potential upgrade works necessary to support anticipated growth.

Rotorua Airport Feedback

- The residential/brown area around Williton Road, eastern side of Wyndham Road and northern side of Lee Road (properties near the runway) is actually zoned light industrial due to the airport noise contours. Could this please be changed to reflect current zoning as it is important that the FDS supports the Air Noise contours that are in the District Plan? Please see red line in the map below.
- Could the potential new open park on Lee Road be extended or moved closer to the lake so that it abuts the existing Lee Road reserve (which I suggest should be added to the plan below). The corner of Lee Road Reserve and the land between it and the proposed park, is inside the Air Noise area and cannot have houses built on it under current District Plan rules.
- Could the explanation for the grey land (Reserves, open spaces and conservation areas) be clarified to include existing business areas?



From General Feedback

- Tupapakuraa stream needs to be amended to Waiteti Stream on the Ngongotahā Priority Area Map
- Under “How many houses will we need?” – First line – correction to typing error for expected household increase from 7,850 to 7,800. (Pg. 16)
- Under “How many houses will we need?” – Correction of typing error from high growth to medium growth. (Pg. 16)
- Long term potential high density shading to be centred around Te Ngae Shopping Centre and not around Morey Street
- Potential new business areas (purple areas) removed from lakeside of State Highway 30. Colours added in error - these areas are already zoned for this purpose in the current District Plan. (Pg. 39)
- Under “Key projects are:” – point 8 – correction of spelling to Mountview Green (Pg. 67)
- Map 19: Indicative Timing for Development for New Growth Areas – reduce ‘Long Term – Intensification’ in Central area up to Rimu Street to be consistent with other Central maps. (Pg. 69)

16.0 Conclusion

This report has attempted to thematically capture the feedback and submissions received on the Rotorua Future Development Strategy. A diverse range of feedback was received on a range of themes that covered the full spread of the FDS outcomes. There was also some good perspectives on how the strategy can potentially be improved to ensure outcomes of the FDS can be delivered effectively in an integrated manner. Useful feedback/ considerations was also received on the implementation of the FDS, referring specifically to the timing/ staging of greenfield land release and how intensification can be further enabled and incentivised, so that Rotorua can ensure the development of a well-functioning urban environment, but still provide sufficient development capacity (that can ideally be fully realised).



KEY

FDS Growth Locations:

- Business
- Residential
- Rural Residential
- Long Term Intensification (High Density)

Additional Locations (proposed through submissions/feedback):

- Business
- Residential
- Rural Residential

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