

25 July 2025



Name of Submitter: SmartGrowth

c/- Mayor James Denyer: SmartGrowth Leadership Group Chair

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Via email: ndprogramme@mfe.govt.nz

National Direction Programme - Submission

Thank you for the opportunity to make a submission on proposed changes to the resource management framework – Phase 2 – National Direction Programme.

This submission is made on behalf of the SmartGrowth urban growth partnership. It does not include or reflect the views of SmartGrowth central government partners. Individual SmartGrowth partners may also make their own submissions.

Overall, SmartGrowth is supportive of the general direction of the proposed changes to introduce new national direction, and to streamline existing national direction provisions to ensure they are fit for purpose. Notwithstanding this, careful consideration needs to be given to the effect of the proposed changes on the natural and built environment, including planned future growth areas.

If you have any questions regarding this submission, please contact our SmartGrowth Advisors: Craig Batchelar craig@cogitoconsulting.nz or Nichola Lennard nichola@gmdconsultants.co.nz

Thank you for the opportunity to submit on the resource management reform programme. We look forward to reviewing the outcomes of the consultation process in due course.

Signed:

A handwritten signature in black ink that reads 'James Denyer'. The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

Mayor James Denyer

Chair - SmartGrowth Leadership Group

1.0 Introduction

This submission is made by the SmartGrowth Leadership Group (“SmartGrowth”), a joint committee of the Bay of Plenty Regional Council, Tauranga City Council, the Western Bay of Plenty District Council and Tāngata Whenua. The joint committee also includes central government. However, this submission does not include nor reflect the views of central government.

SmartGrowth is responsible for overseeing the implementation of the SmartGrowth Strategy, a spatial plan and future development strategy for the western Bay of Plenty sub-region.¹

2.0 The SmartGrowth Strategy

2.1 Overview of the Strategy

The SmartGrowth Strategy 2024 – 2074 (including Future Development Strategy) was adopted by the partners in August 2024.² The Strategy sets the strategic vision and direction for the growth and development of the sub-region. The Strategy provides a framework to manage growth in an integrated and collaborative way in order to address complex planning issues, especially matters that cross over council boundaries.

The Strategy contains six transformational shifts for change supported by growth directives:

1. Homes for Everyone
2. Marae as Centres and Opportunities for Whenua Māori
3. Emissions Reduction through Connected Centres
4. Strong economic corridors linking the East and West to the City and the Port
5. Restore and enhance eco-systems for future generations
6. Radical change to the delivery, funding and financing model for growth

SmartGrowth is based on an envisioned population scenario of 400,000 people over the next 50 plus years. It has a particular focus on the next 30 years but does consider growth over a 50-year period. The Strategy is underpinned by the “Connected Centres” approach, which has a land use settlement pattern and multimodal transport system that enables people now, and in the future, to continue living, learning, working, playing, and moving in the western Bay of Plenty in a way that is both desirable and sustainable.

¹ The western Bay of Plenty sub-region covers the territorial areas of the Western Bay of Plenty District Council and Tauranga City Council.

² The Strategy can be found here: <https://www.smartgrowthbop.org.nz/smartgrowth-strategy-2024>

Over time, this programme will deliver greater housing and transport choices, improve and enable safe access to the sub-region's many social and economic opportunities, move goods efficiently and reliably, contribute to more social and affordable housing choices, and manage environmental and cultural impacts often associated with unplanned growth and help reduce transport-related greenhouse gas emissions.

2.2 SmartGrowth Interest in the Resource Management Reform

SmartGrowth is the administrator and implementor of the subregion's spatial plan and future development strategy and therefore has a strong interest in any changes to the resource management system that could affect the planning and provision of infrastructure, housing and business supply, meeting of tāngata whenua aspirations and goals, the creation of well-functioning urban environments and responses to climate change. In general, SmartGrowth seeks to enable growth and development in the subregion, while also recognising environmental constraints and protecting environmental values.

The SmartGrowth Future Development Strategy identifies that the subregion has a significant shortfall in development capacity over the next 30 years. This demand is set within a context of a highly constrained and sensitive environment. To unlock greenfield urban growth areas and support the redevelopment and intensification of existing urban areas, significant investment is required in infrastructure. The funding and financing of infrastructure to support growth is one of the biggest challenges facing the subregion.

3.0 Submission

3.1 Overview

SmartGrowth has reviewed the proposed changes to national direction under the Resource Management Act 1991 (RMA).

Detailed comments and changes sought are outlined in **Table 1** attached to the submission, with a summary following below.

3.2 Submission Summary

SmartGrowth is **supportive of the general direction** of the proposed changes to introduce new national direction, and to streamline existing national direction provisions to ensure they are fit for purpose. Careful consideration needs to be given to the effect of the proposed changes on the natural and built environment, including future growth areas.

SmartGrowth submissions are summarised below, with detailed submission points included in an appended table.

New National Policy Statement for Infrastructure

For the National Policy Statement for Infrastructure (NPS-I), SmartGrowth:

- **Strongly supports** the proposal to require decision-makers to have regard to spatial plans – including future development strategies and other strategic plans for infrastructure.
- **Supports the general intent** of the new NPS-I, in that it provides a clear direction for decision-makers on taking into account the benefits of infrastructure when making decisions. However, the need for infrastructure projects should not override the management of localised adverse effects in all circumstances.
- **Supports** references in Policy 1 to providing for the benefits of infrastructure to well-functioning urban environments and providing sufficient development capacity to meet demand for housing and business land.
- **Seeks further consideration of** how Māori interests are addressed in the proposal. This includes stronger wording for protecting wāhi tapū or other sites of significance. In terms of Policy 5(1)(c) the submission seeks either the removal of the words ‘in appropriate circumstances’ or that the circumstances where it would not be appropriate for tāngata whenua to not be involved in relation to sites of cultural significance be specifically listed. The references to section 58L of the RMA is unclear given that these provisions only relate to Mana Whakahono a Rohe which are not universally in place. Iwi participation should be in line with relevant legislation, policy and any existing agreements.
- **Seeks revision** of Policy 8 which requires applicants to avoid, remedy or mitigate adverse effects on environmental values (not covered by section 6 or other national direction) ‘where practicable’. This terminology does not provide enough certainty for decision-makers, nor does it appropriately balance the enablement of new infrastructure against protection of environmental values.

There is also the potential to affect sites, areas, landscapes, and taonga of cultural significance where protections are not formally established or mapped. As a result, Māori values like kaitiakitanga may be subordinated to nationally significant infrastructure priorities.

- **Seeks amendment** of the proposed definition for additional infrastructure. The proposed definition is supported as it recognises the broad range of infrastructure that supports the wellbeing of people and communities and their health and safety, however community infrastructure (as defined in the Local Government Act 2002) and public flood control, flood protection and drainage should also be included. The submission also **seeks extension** of the definition of sensitive activities to include papakāinga.

Amendments to the NPS for Renewable Electricity Generation

For the NPS-REG, SmartGrowth:

- **Supports the general intent** of the amendments, subject to minor alterations
- **Seeks revision** of NPS-REG policies to ensure that residential intensification opportunities are not reduced by protecting small-scale (individual on-site use) assets such as a solar panel on a residential roof.

National Policy Statement on Electricity Transmission (change title to the National Policy Statement for Electricity Networks)

For the NPS-EN, SmartGrowth:

- **Supports the general intent** of the proposed changes, subject to minor alterations
- **Seeks revision** of Policy 1 to ensure that the adverse effects of electricity networks are appropriately considered.
- **Seeks revision** of Policy 11 to require utility providers to engage with local authorities and consider any relevant spatial plan or future development strategy when undertaking long-term strategic planning.

New National Environmental Standards for Papakāinga

For the NES-P, SmartGrowth:

- **Supports the intent** of the proposed NES for Papakāinga and the recognition of the role of Papakāinga housing in addressing supply shortfalls and enabling whenua Māori to achieve Māori aspirations.

New National Policy Statement for Natural Hazards

For the NPS-NH, SmartGrowth:

- Supports **the general intent** of the proposed NPS-NH as a consistent framework for identifying significant risk from natural hazards but **seeks that further guidance is provided** in order to understand the application of the framework in different circumstances and to assist with identifying gaps. As currently proposed, the NPS-NH is likely to have variable outcomes until national guidance and standards on acceptable risk thresholds are established.

Amendments to the National Policy Statement for Highly Productive Land

For the proposed amendments to the NPS-HPL, SmartGrowth:

- **Supports the intent** of the proposed changes to enable urban growth in greenfield areas. The SmartGrowth Strategy has a particular focus on provision of land and infrastructure sufficient to address any shortfalls in housing and business capacity. At the same time, the Strategy identifies HPL and versatile soils losses as a challenge. SmartGrowth has an interest in ensuring that urban development areas that are identified in the SmartGrowth Strategy can continue as planned.
- **Supports** the removal of LUC3 on land that is needed for urban development. SmartGrowth requests some amendments to ensure that this is provided for. The identification of future urban development areas and HPL should also be part of the development of regional spatial plans under the new system.
- **Seeks retention of** protection of LUC3 for all other land.

- **Supports** the amendment to timeframes to notify Regional Policy Statement HPL maps given that there will no longer be regional policy statements under in the new planning system. SmartGrowth recommends that HPL mapping is delivered through the Regional Spatial Plan under the new system.
- **Supports** the concept of 'special agriculture areas' (SAA)

Table 1 SmartGrowth Detailed Submission

Proposal	SmartGrowth Comments	Relief Sought
Package 1 Infrastructure and Development		
New National Policy Statement for Infrastructure		
General	<p>The discussion document sets out that the proposed National Policy Statement for Infrastructure seeks to address a range of existing issues relating to infrastructure consenting and development, including providing for adequate recognition of the benefits of infrastructure and addressing a lack of national direction. The SmartGrowth Strategy recognises the challenges associated with the provision of infrastructure in the subregion, including keeping pace with population growth and ensuring that infrastructure is resilient to the effects of climate change.</p> <p>SmartGrowth supports the general intent of the new National Policy Statement for Infrastructure, in that it provides a clear direction for decision-makers on taking into account the benefits of infrastructure when making decisions.</p>	Retain the direction for decision-makers on taking into account the benefits of infrastructure when making decisions.
Definitions: D1 & D19	<p>SmartGrowth seeks some changes to the definitions of infrastructure to ensure that there is greater clarity around what is included and to provide sufficient coverage for key activities.</p> <p>We seek that the proposed definition for additional infrastructure be amended. The proposed definition is supported as it recognises the broad range of infrastructure that supports the wellbeing of people and communities and their health and safety, however community infrastructure (as defined in the Local Government Act 2002) should also be included. This would then cover community infrastructure such as parks and reserves, and public facilities like pools, sports and</p>	<p>The amendments sought are as follows:</p> <p><i>D1 Additional infrastructure</i></p> <p><i>a) a relevant school or institution as defined in the Education and Training Act 2020;</i></p> <p>...</p> <p><i><u>h) community facilities as defined in the Local Government Act 2002; and</u></i></p> <p><i><u>i) any public flood control, flood protection or drainage works carried out</u></i></p>

Proposal	SmartGrowth Comments	Relief Sought
	<p>community centres. Public flood control, flood protection and drainage should also be included.</p>	<p><i><u>(i) by or on behalf of a local authority, including works carried out for the purposes set out in section 133 of the Soil Conservation and Rivers Control Act 1941; or</u></i></p> <p><i><u>(ii) for the purpose of drainage by drainage districts under the Land Drainage Act 1908.</u></i></p> <p>Extend the definition of sensitive activities to include papakāinga:</p> <p><i>D19 Sensitive activities - residential activity (including visitor accommodation and retirement accommodation), care facilities, childcare facilities, schools, hospitals, custodial or supervised accommodation where residents are detained on site, <u>papakāinga</u>, marae, or place of worship.</i></p>
Policy 1	<p>Support for references in Policy 1 - Providing for the benefits of infrastructure to well-functioning urban environments and providing sufficient development capacity to meet demand for housing and business land.</p>	<p>Retain Policy 1.</p>
Policy 3	<p>SmartGrowth strongly supports the proposal to require decision-makers to have regard to spatial plans – including future development strategies and other strategic plans for infrastructure. This helps to enable integrated planning.</p> <p>Future Development Strategies and spatial planning play a critical role in ensuring that infrastructure is enabled at the right time and in the right location. They also promote the integration of land use and infrastructure and investment confidence.</p>	<p>Retain Policy 3.</p>

Proposal	SmartGrowth Comments	Relief Sought
<p>Policy 5</p>	<p>The needs of infrastructure projects should not override the management of localised adverse effects in all circumstances.</p> <p>This is especially important to the cultural values that tāngata whenua hold regarding the natural environment and its resources, as articulated in Article Two of Te Tiriti o Waitangi, which affirms the protection of Māori taonga and tino rangatiratanga over land, water, and other important resources. The NPS should allow for an appropriate weighting of effects on a case-by-case basis.</p> <p>The provisions as currently proposed have the potential to result in adverse effects on sites, areas, landscapes, and other taonga of cultural significance to tāngata whenua, particularly where protections are not formally established or mapped. Without genuine consideration of Māori rights and interests, Māori values such as kaitiakitanga may be subordinated to infrastructure priorities deemed nationally significant.</p> <p>The reference to section 58L of the RMA is unclear given that these provisions only relate to Mana Whakahono a Rohe which are not universally in place. Iwi participation should be in line with relevant legislation, policy and any existing agreements.</p> <p>We request stronger, clearer language to ensure genuine and consistent consideration of Māori rights and interests, as the proposal suggests enabling infrastructure “even if there are adverse effects on environmental values not listed in section 6 of the RMA” – many Treaty settlement values fall outside that narrow definition.</p> <p>We seek amendments to the phrase (and its intent) “in appropriate circumstances...”, as this is seen as limiting and conditional rather than ensuring full and consistent participation by tāngata whenua.</p> <p>Using terms like “opportunities” and “appropriate circumstances” may mean tāngata whenua involvement is only considered when it</p>	<p>Further consider Māori interests in the proposal. This includes stronger wording for protecting wāhi tapū or other sites of significance.</p> <p>For Policy 5(1)(c) either remove the words ‘in appropriate circumstances’, or identify the circumstances where it would not be appropriate for tāngata whenua to not be involved in relation to sites of cultural significance to be specifically listed.</p> <p><i>P5 Recognising and providing for Māori rights and interests</i></p> <p><i>Decision-makers must recognise and provide for Māori interests in relation to infrastructure activities and infrastructure supporting activities, including by:</i></p> <p>...</p> <p><i>c) providing opportunities in appropriate circumstances for tangata whenua involvement in relation to sites of significance to Māori and issues of cultural significance; and</i></p> <p><i>d) operating in a way that is consistent with <u>relevant legislation, policy and agreements</u> that provides for iwi participation (as defined in section 58L of the RMA).</i></p>

Proposal	SmartGrowth Comments	Relief Sought
	suits the decision-makers, rather than being a guaranteed right or requirement for engagement and participation. If the words “in appropriate circumstances” are to remain then guidance is requested on how this should be interpreted.	
Policy 8	<p>We seek that Policy 8 be revised as ‘where practicable’ does not provide enough certainty for decision-makers, nor does it appropriately balance the enablement of new infrastructure against protection of environmental values.</p> <p>We have recommended these words be removed. If they are to remain then guidance is requested on how this should be interpreted.</p>	<p>Proposed Policy 8 which requires applicants to avoid, remedy or mitigate adverse effects on environmental values (not covered by section 6 or other national direction) ‘where practicable’ be revised.</p> <p>We seek the following changes:</p> <p><i>P8 Managing the effects of new infrastructure and major upgrades on environmental values</i></p> <p><i>Planning decisions must enable new infrastructure or major upgrades of existing infrastructure, provided that adverse effects on environmental values (not in section 6 or covered by national direction) are avoided where practicable, remedied where practicable, or mitigated where practicable.</i></p>
Amendments to the NPS for Renewable Electricity Generation		
General	<p>The discussion document outlines a number of changes proposed to the NPS-REG. These changes are intended to ensure adequate recognition of the role of renewable energy in society and the economy as well as to enable the development of renewable energy to achieve climate change emission reductions.</p> <p>The SmartGrowth Strategy recognises that there is an ongoing need to address reliable power supply issues in light of increased power demand driven both by population growth and electrification and decarbonisation of transport and industry. It sets out that electricity transmission/distribution companies will play a major role enabling</p>	Retain the general direction to ensure adequate recognition of renewable energy.

Proposal	SmartGrowth Comments	Relief Sought
	reduction of greenhouse gas emissions and increasing renewable energy sources to address the effects of climate change ³ .	
Policy B	SmartGrowth supports the general intent of the amendments proposed in the discussion document. However, it is important to ensure that the benefits of small-scale renewable energy (such as solar panels on a residential roof) are not given preference above benefits of intensification and/or urban development. That is, the existence of small-scale renewable energy should not preclude future intensification or development of an area.	<p>Amend policy B as follows:</p> <p><i>1) Decision-makers on REG activities must recognise and provide for the importance of:</i></p> <p><i>a) enabling cumulative increases of REG output at any scale and any location, including small-scale and community-scale REG activities; and</i></p> <p><i>b) avoiding, where practicable, any loss of REG output from a region, district or existing REG assets.</i></p> <p><i>2) When making decisions on policy statements and plans, decision-makers must have regard to a reduction in the potential utilisation of renewable electricity resources from inappropriate subdivision, use and development.</i></p> <p><u><i>3) This policy does not override NPS-UD objectives and policies relating to development and should not compromise identified growth areas within a strategic planning document, including future development strategies.</i></u></p>
National Policy Statement on Electricity Transmission (change title to the National Policy Statement for Electricity Networks)		
General	The proposed changes to the NPS-ETA seek to recognise the national significance and benefits of the electricity network, to streamline and update regulations. As above, SmartGrowth acknowledges the critical role of electricity transmission and distribution in contributing to the wellbeing and safety of communities in the subregion.	That the NPS objective and policies are revised to ensure that the adverse effects of electricity networks are appropriately considered. For example, that consents consider the effects on outstanding natural features and landscapes, and indigenous biodiversity.

³ SmartGrowth Strategy p. 133

Proposal	SmartGrowth Comments	Relief Sought
Policy 1	<p>SmartGrowth supports the general intent of the proposed changes but seeks to ensure that the benefits of this infrastructure do not override localised adverse effects in all circumstances.</p> <p>SmartGrowth recommends amendments to Policy 1 to ensure that adverse effects on the environment are avoided, remedied or mitigated.</p>	<p>Amend Policy 1 to include that decision makers must also recognise adverse effects:</p> <p><i>P1 National significance and benefits of the electricity network</i></p> <p><i>1) Decision-makers on EN activities must recognise and provide for the national significance and benefits of the EN to be realised at national, regional and local scale <u>while avoiding, remedying or mitigating any adverse effects of activities on the environment.</u></i></p>
Policy 11	<p>Electricity Network operators should consider future development strategies and other spatial plans when making strategic planning decisions.</p> <p>This reflects an integrated approach with respect to infrastructure provision and ensures that the long-term vision for districts/regions and other infrastructure plans can be factored into route selection and design.</p>	<p>That proposed Policy 11 be revised to require utility providers to engage with local authorities and consider any relevant spatial plan or future development strategy when undertaking long-term strategic planning. The amendment sought is as follows:</p> <p><i>1) Local authorities must:</i></p> <p><i>a) engage with the operators of the EN to facilitate the medium to long-term strategic planning for the construction, operation, maintenance, and upgrade of the EN; and</i></p> <p><i>b) recognise that the designation process can facilitate long-term planning for construction, operation, maintenance, and upgrade and development of the EN.</i></p> <p><u><i>EN operators must:</i></u></p> <p><u><i>Consider future development strategies and other spatial planning documents when making strategic planning decisions for the EN.</i></u></p>
New National Environmental Standards for Papakāinga		

Proposal	SmartGrowth Comments	Relief Sought
<p>General</p>	<p>The discussion document sets out the specific provisions needed to unlock opportunities for Māori landowners to live on ancestral land and enable papakāinga more efficiently and quickly. Standardised requirements would increase the supply of affordable housing, better enable the development of whenua Māori and support positive social and economic outcomes for Māori.</p> <p>SmartGrowth supports the intent of the proposed NES for Papakāinga and the recognition of the role of Papakāinga housing in addressing supply shortfalls and enabling whenua Māori to achieve Māori aspirations.</p> <p>The SmartGrowth Strategy identifies “Marae as centres and opportunities for Whenua Māori” as one of six key transformational shifts to drive change for the western Bay of plenty sub-region. This includes empowering housing delivery on whenua Māori and enabling opportunities for papakāinga, which the Strategy recognises as integrated facilities encompassing housing, education, social services, and hauora.</p> <p>Papakāinga development is already largely enabled in planning provisions within the sub-region.</p> <p>Infrastructure and funding remain the most significant barriers for Māori in the sub-region wanting to develop their whenua Māori due to the high costs of connecting to essential services. Many Māori land blocks in the sub-region are located in rural areas where infrastructure is limited or non-existent, making development prohibitively expensive.</p> <p>Additionally, funding access is constrained by the complex legal status of Māori land, which often prevents its use as collateral for loans. Without targeted funding support and investment in enabling infrastructure, Māori landowners face ongoing difficulties in</p>	<p>Retain. No specific changes requested.</p> <p>Ensure there is clarity and guidance on how the NES will interact with existing plans and provisions to ensure practical implementation that genuinely supports papakāinga development.</p>

Proposal	SmartGrowth Comments	Relief Sought
	<p>unlocking the potential of their whenua for housing and community development.</p> <p>Across the sub-region, there is unified support for the intent of the proposed NES for Papakāinga to enable housing on whenua Māori and recognise the aspirations of Māori communities. The councils collectively support a more permissive national planning framework, provided there is flexibility to retain or develop more enabling local provisions. There is shared recognition that while national direction can unlock opportunities, significant challenges remain—particularly around infrastructure, wastewater management, and funding access. All partners seek clarity on how the NES will interact with existing plans and provisions to ensure practical implementation that genuinely supports papakāinga development.</p> <p>There is some concern that the proposed NES-P may override existing city and district plan rules where there is duplication or conflict — including provisions that have been carefully and meaningfully developed in partnership with tāngata whenua. While the NES-P aims to standardise and streamline papakāinga development, it limits the ability for councils to retain more enabling or culturally responsive provisions unless explicitly allowed. This risks undermining localised approaches that reflect tikanga Māori, community aspirations, and co-designed planning frameworks.</p> <p>By standardising planning and restricting local discretion, the NES-P may inadvertently reduce the influence of tāngata whenua in decision-making processes, especially where provisions in city and district plan rules have been established in partnership with local tāngata whenua. As a result, the NES-P may introduce uncertainty and added complexity into consenting processes, particularly where existing provisions already provide greater flexibility and alignment with tikanga Māori, mātauranga Māori, and Māori values.</p>	

Proposal	SmartGrowth Comments	Relief Sought
New National Policy Statement for Natural Hazards		
General	<p>The creation of an NPS for Natural Hazard seeks to address the current lack of national direction in relation to the management of risk of natural hazards in the resource management framework. The NPS is premised on the basis that local authorities must take a risk-based approach to natural hazards, take a proportionate approach and use best available information.</p> <p>SmartGrowth supports the general intent of the proposed NPS for Natural Hazards as a consistent framework for identifying significant risk from natural hazards but seeks that further guidance is provided in order to understand the application of the framework in different circumstances and to assist with identifying gaps. It is considered that the proposed NPS-NH is likely to have highly variable outcomes until national guidance and standards on acceptable risk thresholds are established.</p> <p>The SmartGrowth Strategy identifies the management of natural hazards as a key challenge for the subregion. The western Bay of Plenty is vulnerable to coastal erosion and inundation hazards and exposed to other natural hazards including flooding, tsunamis, liquefaction, and landslides.</p> <p>Natural hazards are a significant issue when planning for growth, especially where there is pressure to increase development capacity due to an acute shortage of housing⁴. It further acknowledges that natural hazards will be exacerbated by climate change.</p>	<p>Retain. No specific changes requested.</p> <p>That further guidance is provided in order to understand the application of the framework in different circumstances and to assist with identifying gaps.</p>
Package 2: Primary Sector		

⁴ SmartGrowth Strategy 2024-2074, p. 50

Proposal	SmartGrowth Comments	Relief Sought
Amendments to the National Policy Statement for Highly Productive Land		
General	<p>Package 2 sets out changes to the NPS-HPL to address concerns that have been raised around the impact on land availability for development. In particular, the changes seek to remove the NPS-HPL restrictions on LUC3 land, while retaining it on LUC1 and LUC2. Other changes are also proposed, including extension of timeframes for the mapping of HPL.</p> <p>SmartGrowth supports the intent of the proposed changes to enable urban growth in greenfield areas. The SmartGrowth Strategy has a particular focus on provision of land and infrastructure sufficient to address any shortfalls in housing and business capacity. At the same time, the Strategy identifies Highly Productive Land and versatile soils losses as a challenge. The subregion does not have LUC1 land but has large amounts of LUC2 and 3. These highly productive soils and associated microclimate support a horticultural industry that is a key part of the regional and national economy. The concept of 'special agriculture areas' (SAA) is also generally supported for these reasons.</p> <p>The Strategy takes an integrated approach which acknowledges that development may not be appropriate in some areas. It is therefore critical to ensure that areas warranting protection are appropriately identified when planning for growth.</p> <p>SmartGrowth has an interest in ensuring that urban development that is identified in the SmartGrowth Strategy (or a future Regional Spatial Plan) can be delivered as planned. The 10 year limit that is currently in place in the NPS will undermine this outcome and must be removed.</p> <p>We also wish to ensure that rural land that is needed for future urban development is not compromised by rural residential development</p>	<p>Support for the removal of LUC3 on land that is needed for urban development.</p> <p>Make the following amendments to the definition of <i>"identified for future urban development"</i>:</p> <p><i>identified for future urban development means:</i></p> <p><i>(a) identified in a published Future Development Strategy as land suitable for commencing urban development over the next 10 years; or</i></p> <p><i>(b) identified:</i></p> <p><i>(i) in a strategic planning document as an area suitable for commencing urban development over the next 10 years; and</i></p> <p><i>(ii) at a level of detail that makes the boundaries of the area identifiable in practice</i></p> <p>In clause 3.5(7) of the current NPS-HPL, the timeframe for identifying future urban development is set at the commencement date of the NPS-HPL which is 2022. This should now be set to the commencement date of the amended NPS-HPL.</p> <p>Retain LUC3 for all other land.</p> <p>Support amending timeframe to notify Regional Policy Statement HPL maps given that there will no longer be regional policy statement in the new planning system. SmartGrowth recommends that HPL mapping is delivered through the Regional Spatial Plan under the new system.</p>

Proposal	SmartGrowth Comments	Relief Sought
	<p>in the interim. This has been a significant impediment to the effective and efficient delivery of growth in the subregion as result of land fragmentation, over capitalisation, and land use conflict.</p> <p>Identification of future urban development areas and HPL and any necessary trade-offs should be addressed as part of regional spatial plans under the new system (as informed by existing spatial plans and future development strategies).</p> <p>The 30 year indicative zoning requirements under the proposed Going for Housing Growth package, should assist in protecting land that is needed for future urban development.</p>	