

Full details of submissions of consultation carried out relating to the FDS carried out via Special Consultative Process under the Local Government Act 2002 from 20 November 2023 to 31 January 2024.

Questions from online form, proposal 1 2 and 3 as stated on GDC website					
Number	Name	Agree the framework of objectives	Agree preferred growth strategy?	Agree with intensification approach?	Details of submission, further comments.
1	Graeme Card	Y	Y	Y	-
2	Sean Scanlen	Y	Y	Y	<p>A large part of what makes Gisborne a nice town is that it is compact and not hard to get from one part to another. A focus on intensification rather than sprawl means that the town is likely to retain its charm. New developments should take into consideration the likely effects of climate change and the council will need to consider what mitigation strategies will be required, if possible.</p> <p>It is good that the council is considering bus routes. I encourage it to ensure that good walking and cycling facilities are available, including off-road paths where possible. The council should consider adding better protections for pedestrians and cyclists near schools and the hospital, which are already busy places and are sure to become busier.</p> <p>For example, Lytton Road does not even have footpaths along both sides approaching Lytton High School, and is difficult for pedestrians to cross — despite the fact that it must be one of the busier pedestrian roads in the city! I regularly see students walking on the road where there is no footpath and crossing in dangerous ways, and feel sure that one day there will be an accident.</p>
3	Ian Allan	Y	Y	Y	Go for it, please don't listen to too many noisy nimbies! Gisborne will be so richer for quality dense housing growth, especially in the central suburbs. More intensification in the central city will revitalise shopping and dining too.
4	Peter Steven	Y	Y	Y	It's more environmentally friendly and will result in a nicer and more people-friendly city.
5	Tessa Peach	Y	Y	Y	I would be more likely to visit a city that had this type of life in the city centre. I also like that the surrounding countryside would be better preserved with less urban sprawl.
6	Jack Marshall	Y	Y	Y	Thank you for all the work that has gone into this document. It's obvious many hands and hours have gone into producing this work. Overall, I'm very impressed with the direction the GDC has taken, along with taking onboard feedback from the public. There are three main areas I'd like to give comments on and feedback on. First, to revitalise the city it will be

					<p>important to allow life to live there. I'd like to repeat what stakeholders have already said in the document, "there are a number of older buildings in the CBD that are not fit for purpose and could be redeveloped into high-density housing." The council should allow and even promote the retrofit of older buildings in the city.</p> <p>Second, I propose the GDC coordinate future infrastructure development by implementing shared paths for cyclists and walkers. I would like future planning to explore the option of installing a shared path whenever an infrastructure project is undertaken on land which has been identified as a potential shared pathway, walkway or cycleway. An example of this would be simultaneous upgrades to water infrastructure and the installation of a cycleway along Rutene Road. Referring to Table 3: FDS Key Actions on page 28, it is evident that new infrastructure is essential for supporting growth in Kaiti. If the expansion requires the installation of new stormwater pipes along Rutene Road, it would be practical to install a cycleway concurrently. This approach achieves two goals simultaneously and may also minimise complaints from residents by showcasing a visible upgrade to the infrastructure above the ground.</p> <p>Third, I want to touch on the importance of separated shared paths. The document discusses "potential on-road cycle paths." I argue all cycle paths should be named as protected lanes going forward, distinctly separated from vehicular traffic by a barrier. In my eyes, any on-road cycle paths installed going forward must be protected. Painted-on lines are not worth the paint.</p> <p>Cycling infrastructure design should prioritise inclusivity, considering the needs of everyone. Research consistently indicates that women, children, and individuals with disabilities are more inclined to cycle when provided with protected cycle paths as opposed to non-protected alternatives. While it might be more cost-effective to paint lines on the road simply, this approach fails to cater to the diverse needs of our entire population. In this proposed plan, I would like the documentation to explicitly specify the implementation of protected cycleways in all future developments.</p>
7	Peter Jones	N	N	N	<p>It will ruin the tone of the city and turn it into a ghetto of welfare beneficiaries. Because there are no jobs for the projected growth.</p> <p>Because the future development plan is a ponzi scheme designed to suit the needs of new immigrants who aren't even here yet.</p> <p>The council staff are all schooled in net-zero bullshit.</p>

					They only think that they know what they are doing. The reality will be an open air prison. It all sounds fine and dandy but we the locals will not thank them. The growth strategy will increase poverty and social inequity. Tangata whenua of all races will be poor beyond present imagination and a new class of foreigners will supplant the locals who will be priced out of their own town. The economy will crash long before the plan is fulfilled and we will be left mired in unrepayable debt. Locals won't even be able to afford push bikes.
8	Sarah Rush	N	N	Y	This is the recommended approach to climate change and means less money spreading infrastructure, and more focus on upgrading current infrastructure. I would love to see a rent to own system in Gisborne, as most renters are already paying the equal amount to a mortgage, but paying off an investment for someone else instead of building their own security. If someone has a clear history of always paying their rent on time, and that rent is over \$600 pw, it would be awesome for them to have an opportunity that doesn't include the impossible road of applying for a mortgage. I am currently paying \$30,000 a year in rent on my own! A tight contract whereby missed payments can see the full amount already paid being retracted would protect the investment. This would build a stronger Tairāwhiti for future generations.
9	Te Runanganu i o Ngati Parou				See below

Te Runanganu i o Ngati Porou is the trustee company that will manage its collective affairs for the benefit of "ngā uri o Ngā hapū o Ngati Porou mai i a Potikirua ki te Toka a Taiau". TRONP is the post-settlement-governance-entity for Ngati Porou.

Post the severe weather events of early 2023 Te Runanga o Ngati Porou Tima Taiao (NPTT) have moved to take a more Ngati Porou centric approach to our mahi that is consistent and in-keeping with the following principles that support Ngati Porou tino rangatiratanga, Ngati Porou mana motuhake Ngati Porou kaitiakitanga:

Toitu te Mana Atua – It is acknowledged that Nga hapu o Ngati Porou have, in accordance with their tikanga, an unbroken, inalienable, and enduring relationship with their rohe. This principle is how whanau-hapu regulate and undertake activities on, over or within their rohe.

Toitu te Mana Whenua (me te Mana Moana) – recognising the unbroken, inalienable, and enduring mana of whanau-hapu.

Toitu te Mana Tangata – recognising the right and role of whānau-hapū to exercise and have influence over activities impacting their rohe.

Toitu te Mana Tiriti – acknowledges the partnerships between Ngati Porou PSGE and Ngā Hapū o Ngati Porou and the Crown will be based on honour and integrity.

These principles guide the way we are undertaking all our mahi and include Ngati Porou-centric approaches to housing development, economic development and increased housing developments that support increased presence of Ngati Porou whanau on their whenua. All this mahi is based on Ngati Porou perspective that best meets the needs of our people.

Our interests are clear – we should be allowed the opportunity to assert our Ngati Poroutanga positively, and for our own purposes.

Our uniqueness should not position us outside the system.

A TATAU NEI KORERO

We provide the following comments about the draft Future Development Strategy (FDS) as prepared by Gisborne District Council (GDC).

Given that the National Policy Statement on Urban Development (NPSUD) encourages regions to "promote long-term-planning to achieve well-functioning urban development environments" and GDC states "the FDS influences where growth occurs, but it doesn't build the homes".

TRONP agrees and would assert that this statement in itself directly aids our argument that it absolutely is *OUR* job to build homes.

GDC states, "Tairāwhiti has a housing crisis..."

TRONP agrees and would assert that GDC, through the FDS, restricts our ability to contribute to remedying this crisis by unduly "influencing" the FDS.

GDC states, "[a]lmost half of Tairāwhiti's population doesn't earn enough money to buy or rent a house."

TRONP agrees with this. We would further argue that GDCs proposed housing intensification through the FDS, will perpetuate these inequities by

- a) promoting intensification in areas where homeownership is already present and;
- b) failing to invest in the capacity of municipal infrastructure in Kaiti – where homeowner-occupiers are much lower.

GDC states, "we need to identify more land suitable for housing (known as future growth areas)..."

TRONP agrees and has, on a number of occasions, over the last seven months identified areas where we want to develop housing in our Ngāti Porou takiwa. This is not limited to Gisborne City limits but our rural townships as well. To imply (in the FDS) that Ngāti Porou interests are 'aspirations' when we have told you in concrete terms that this is our want, is inconsistent with our view of how GDC should be supporting us.

GDCs identification of iwi and hapu values.

TRONP takes the position that how GDC accounts for iwi and hapu values, through "korero and engagement" in the FDS undermines our role as tangata whenua and as the Te Tiriti o Waitangi partner for Ngāti Porou whenua, wai and whanau.

GDCs ascribing of overarching Aspirations and Values (4.1).

TRONP do not support the incorporation of kaupapa-maori values in the FDS. It is our position that GDCs use of these values camouflages GDCs lack of support for Ngāti Porou itself to design, develop and build housing on Ngāti Porou whenua in the Ngāti Porou takiwa.

FDS Objectives (6.0) Growth and development must revitalise and enhance Te Oranga o te Taiao and growth and development occurs in accordance with te Mana o te wai.

TRONP asserts that this mahi is absolutely the mahi of the PSGE *not* GDCs- *in isolation* of us - in our takiwa.

RURAL TOWNSHIPS

We note the last-minute inclusion of Ngāti Porou coastal townships in the FDS and the accompanying statement that housing potential in those locations has a 'cap'. Again, this approach is not in keeping with our expectations of being afforded the opportunity to assert our Ngāti Porou tangata positively.

Other than roads, there are no municipal services in any of these locations. There are also no papakainga provisions relating to housing in the TRMP. So, to attempt to frame the analysis in the FDS as supporting the future development of these remote Ngāti Porou communities feels at best, disingenuous.

The same is true for the inclusion of the NPS Indigenous Biodiversity in the FDS. Within Tairāwhiti, the NPSIB applies only to those areas – predominantly on Te Ture Whenua Maori – that have been determined to have existing indigenous biodiversity values. None of which exist in the urban areas.

Our experience with the Erosion Control Forestry Project, that while it was set up to incentivise and encourage planting to arrest the development of erosion, the highly erosion prone Maori land that was identified has still not been developed.

OPPORTUNITIES

A quantum leap is required – the same old thinking that got us here is not going to lift us up for the collective benefit.

The opportunity presented by the FDS is one where clear-eyed thinking about how the form of the urban area can transition to much better suit the needs of now, and of future generations.

It is disappointing that the FDS hasn't taken the opportunity to signal Kaiti as a prime location for intensification. Which might in other ways could be the chance to transition to an urban form where seemingly intractable issues-like wastewater overflows- no longer exist.

NPTT asserts that we should be given the opportunity to contribute by writing directly to the FDS so that the wicked problems, that we agree on, are **not** recast again in future strategies.

Opportunities to improve readiness within Ngāti Porou takiwa

Kaiti is one of only two 'island refuges' in Turanga in the event of a magnitude 9 quake in the Hikurangi Trench and subsequent anticipated tsunami. This fact only adds to the rationale that the conditions for radically redeveloping Kaiti should be introduced to the TRMP. And that the regulatory authority also assumes the role of championing quality.

It is through the lens of disaster reduction and readiness that we also view the absence of any whakaaro in the FDS about additional or alternative sources and treatment of municipal drinking water within the Ngāti Porou takiwa as a glaring omission. Particularly considering the lived experience in February 2023 where the only sources of municipal drinking water for the urban area - being located on the Turanga/southwestern side of nga awa Waimata me Turanganui – were severely compromised by cyclone Gabrielle. The result being 40,000 people living with water restrictions for 84 days.

Ministerial Inquiry into Land Use, May 2023

As many have already observed –the Ministerial Inquiry into Land Use, consequent report *Outrage to Optimism* (May 2023) and Cabinet's response to the Inquiry's findings, will be important to protect our people and our whenua. Especially as we collectively work to plan for, react and adapt urgently to the dual crises of global warming driven climate change and biodiversity loss.

With that in mind, we are keen to understand from the Council's perspective how the FDS and other reports produced by the GDC as part of the TRMP planning review will sit alongside the quickly evolving work of the two Ministerial Advisors (the RMA Advisor and the Facilitator) appointed in mid-late September 2023. For example, the RMA Advisor will among other things "review the GDC's capacity and resources to implement the TRMP review

..."

In one version of events, that could raise questions as to whether the Council should formally launch the review so soon and right now at risk of ending up duplicating or needing to go back on work done.

The pathway forward - TRONP directives to GDC:

In conclusion, "we should not forget that our small size and unitary system can lend itself to radical and innovative solutions when required. Things can change fast." The Hon. Christopher Finlayson, Attorney General and Minister for Treaty Negotiations (2008-2017). TRONP TT are determined and ambitious about enabling new ways of achieving consensus and finding solutions to entrenched challenges faced by our people.

We urge GDC to seriously contemplate the following TRONP directives, holding in mind Professor Dominic O'Sullivan's whakaaro "...that not all local government functions must be conducted by councils. Some functions could be more justly conducted by iwi...or other Maori political communities and managed to reflect rangatiratanga."

To this end, we provide the following directives:

The system to needs to do better and more for Ngati Porou whanau to be able to move beyond "surviving on our whenua" to "thriving on our whenua".

In our takiwa, Te Runanganui o Ngati Porou are absolutely the vehicle to support increased whanau presence and their permanence on their whenua.

Our uniqueness should not position us outside the system and should allow us the opportunity to assert our Ngati Poroutanga positively, and for our own purposes.

Tiriti-led creates an obligation by the Crown and its representative agencies to actively protect Ngati Porou rights and interests in the Ngati Porou takiwa.

It is not unreasonable for TRONP to expect as the PSGE that we define those interests.

10	Te Runanga o Turanganui a Kiwa				Receipt of consult
11	Thane Houston-Stevens	Y	Y	Y	It is fundamental that any future development within Tairāwhiti is sympathetic and beneficial to the environment. Development should seek to enhance the environment while also support growth and communities. The preferred option strikes a careful and considered balance between intensification of the existing urban environment and some additional growth opportunities in under-utilised greenfield areas at the edge of the city boundaries. The preferred option will allow for densification that creates good urban design principles and considered outcomes. Congratulations to everyone involved in the establishment of the FDS. This planning is vital to ensure a good urban environment for the future residents and visitors of Tairāwhiti. Development needs to be supported by well-planned and functional infrastructure that enhances the existing environment and creates a connected/cohesive city.
12	Christine Brunner	I don't know	I don't know	I don't know	In the housing and business capacity assessment, it states: "The share of smaller households, specifically one person and couple households, increases from 52% currently to 56% by 2050. Within these households there is a greater share living in attached types over time, signaling a change in typology preferences. Importantly, these household types include both young and aged individuals. Households are more likely to adjust their housing choices based on need and life stage." I think it is not necessarily correct to assume a single person or couple (eg parents whose kids have moved out) will move from detached into attached housing. In my experience there are a lot of elderly parent couples and single persons who prefer to stay in a detached house. My overall feedback on the future projection of the population is:

					<p>Gisborne is increasingly becoming a "lifestyle destination" and increasingly popular with high-income remote workers.</p> <p>In the past there has been a constraint to influx of high income earners because there are limited jobs with high wages in Gisborne.</p> <p>With a significant proportion of high-income earners now being able to work 100% remotely this constraint is suddenly removed. I see a drastic gentrification happening in Gisborne over the next 10 years or so with families and single people moving here because of the beaches, nature and lifestyle - both immigrants and New Zealanders.</p> <p>These people can easily pay higher rents and higher house prices than locals.</p> <p>This will most likely force the low income earners to leave the city due to the rise in cost for housing.</p> <p>I observe rentals being bought up by people who move into the house and renovate.</p> <p>Hence the number of rentals has decreased drastically over the last couple of years.</p> <p>I have moved from Auckland to Gisborne and have been living in Gisborne in my own house since 2015 working 100% remotely for NZ and overseas employers.</p> <p>The location of work does not determine the location of residence anymore.</p> <p>This could lead to unexpected effects.</p> <p>2nd submission</p> <p>I do not support intensification of density of houses in established suburbs like Te Hapara or Lytton West as existing home owners (living quality, house values) are negatively affected.</p> <p>There is plenty of prime land available within the city which is currently used for commercial or industrial purposes and could easily be repurposed for new residential developments.</p> <p>It makes no sense to have heavy industry, car repair shops, scrap metal storage, and similar "heavy" industrial businesses in the city center.</p> <p>In my opinion these should really be relocated to the outskirts of the city to make room for new residential developments.</p> <p>Eg The giant industrial area between Waikanae Creek and Awapuni Rd could be rezoned as a residential area.</p> <p>This is potentially attractive prime residential land near the beach, in walking distance to the city center and to the Kiwa pool. The industrial area along the southern end of Stanley Rd could also be rezoned as a residential area.</p> <p>Even inside the City centre are plenty of businesses that could be considered "industrial land usage" eg the car repair shops and car wash place in the area Childers Rd Corner Carnavon St. Or there also is a lot of commercial use of land on Palmerston Rd (car repair shops or the Panel and Paint shop at 84 Derby St).</p> <p>These are businesses that need a lot of space and it makes no sense to have them in the city centre.</p> <p>It would be common sense to use this commercial land in the city centre to build new houses rather than lowering the living quality in existing suburbs by squeezing more houses into there</p>
13	Oliver Vetter	Y	Y	Y	<p>This just makes sense in the context of the constraints - I'd like to see further intensification options in Awapuni I agree emphasizing the importance of the environment on our urban spaces and future generations Seems like a measured and logical approach</p>
14	Bodeane Kingi	N	N	N	<p>Intensification to the degree that council is proposing is similar to Indian and African over populated countries, intensification to that</p>

					<p>degree will be akin to slum like areas, encouraging further wealth disparity and classism within the region.</p> <p>Suburbs outside of the city need to be developed, like makaraka and Ormond into more urban areas than rural, things that will help with this is moving shops from town closer to the hospital and developing town (Gladstone/Childers/Palmers into accomodation</p> <p>This outcome will force the city into slum like proximity and encourage wealth disparity and classism.</p> <p>Gisborne is at a point where a huge change could drive the city to new heights, shifting the business area on the city centre out towards Makaraka or Ormond with a hub like structure similar to Whakatane has towards the Tauranga turn off will solve two issues with one stone, businesses will be able to lease the hub off council bringing money into the region instead of into private owners and town buildings can be purchased to be changed into residential areas or apartments and finally repaired from the 2006 earthquake damage that plagues the entire town to this day.</p> <p>Development of a business sector out rurally will encourage property development around them, similar to how Hawke's bay has developed multiple cities and townships to congregate into an amalgamation of almost one city together in practice. If we were to develop inland into business appropriate buildings and encourage builds out that way, we would be better off in the long term while still keeping the cities identity and peoples space to not live in slum like areas. Agriculture in the area isn't bringing money into our town anymore, private owners now have direct connections to suppliers or buyers for everything and the city misses out on that money being spent here. We need to look towards the future.</p> <p>Also a university in this city is sorely needed to inject some youth into the area or at least give ours a reason to stay, Gisborne has a real opportunity to keep our graduates here and encourage high income earners to stay because of it's beauty (when maintained correctly, one look at the alleyways in town and you can see it's not), Beaches and space it allows for people to breathe. Intensification kills the beauty and space conditions</p>
15	Ingrid Derbyshire	Y	Y	Y	<p>We need to use all the empty buildings in the town centre</p> <p>We need to keep our productive land. Save land</p>
16	Ariel Chew	Y	Y	Y	<p>The objectives set out the direction needed for Gisborne</p> <p>At the moment, supporting infrastructure are found mainly in urban areas. By focusing on existing areas that have well supported infrastructure (or perhaps only requiring upgrades to facilitate growth) is more preferable than managing many areas at once.</p> <p>Same reason as above, allows focused efforts on one main area first instead of trying to manage multiple growth areas that may lead to poor or slow benefits.</p> <p>Looking forward to see how it unfolds and interacts with other strategies and the TRMP. Might be a tough question to answer when it comes down to environment vs economic/people benefits though in options.</p>

17	Aruna Wickramasinghe	Y	Y	Y	
18	Jesyca X	I don't know	I don't know	No	Stop putting houses where there already is housing but making two houses turn into 8 or more. Stop letting it happen in established areas that are quiet and have two houses, Only to tear them down and make them into more than two. No body wants the extra noise and traffic when two houses on a property is already enough.
19	Carolin Deutch	Y	Y	Y	1. Please consider public transport extending out to Makauri/ Makaraka/Ormond/Patutahi etc., I. E. Into areas where more houses are planned. That could be hourly /every couple of hours. the light of climate change it is important to ensure that when new developments are build that people have reliable transport options to get to mahi in town without resorting to cars. 2. Intensification in the city is a great idea, as this will drive foot traffic for city shops if people live in walking distance to their mahi.
20	Lee Clake	I don't know	I don't know	I don't know	Not interested in agenda 2030
21	Becky X	I don't know	I don't know	I don't know	I do believe the city centre needs massive improvements It's terribly sad the enormity of our run our centre looks. Why would people want to visit and continue to stay in Gisborne I truly believe a focus needs to be placed on providing family friendly activities that can be done rain or shine especially in our current climate. Quality hospitality and night life for all ages there is not a lot to do to be honest I think Gisborne has amazing potential but we really do utilise what we have Why plan for all the extra housing when it's struggling to keep people wanting to visit or even stay when there's no a lot to do
22	Luca Barone	I don't know	I don't know	I don't know	I recently had an issue with the RMA as not protecting me for loud noises under home occupation. I believe we should have a robust discussion around the environmental and noise protection before agreeing in increasing housing density. Also we should address the historical lack of facilities for the community. More density signify more potential noises from activities and neighborhood. The current RMA does not protect the citizen enough - I need yo fully understand what is proposed before buying it. What environmental and noise protection will be guaranteed?
23	Blondell Samuels	Y	Y	Y	less worry yes, because less grounds more growth Fresh, new and future prepared I think Gisborne can do more strong sustainably
24	Michael Rennie	N	I don't know	Y	Prioritising the environment above all else is in direct opposition to adding

					<p>more houses and people. It should be a balance between Te Taiao and He Tangata, not one over the other.</p> <p>Intensification will only work if there are other regulatory changes that allow and promote it (dwelling size restrictions, height requirements etc).</p> <p>Fundamentally, it will also require a cultural change to move away from single, detached family homes. If either of the proceeding conditions don't happen, then the key drive of intensification will fail and it'll be back to the drawing board to revisit greenfield development. There are plenty of execution risks. Good luck!!</p>
25	Alan Gaynor	Y	Y	Y	<p>Giving reasoning allows understanding of why the thing is happening. I also agree with protecting our environment to minimise damage from the increasing adverse weather events</p> <p>Not doing the "Auckland urban sprawl" seems a good idea to me</p> <p>Linking surrounding areas to the Inner City intensification and providing easy access sounds good to me.</p> <p>Just look at what Auckland did, and do the opposite.</p>
26	Pratik Jethwa	Y	Y	Y	<p>It makes sense to intensify and build upwards once you consider climate change. Easier and cheaper to build resilience into a smaller area rather than a sprawl. My main concern continues to be infrastructure growth keeping up with population growth and increase in homes. We already see so many issues now! And we have so many families struggling to find homes now, and none of this addresses that in the shorter term, I feel. We need apartments quicker, preferably rent to own style etc.</p>
27	C. Gilbert	Y	Y	Y	<p>Guidelines have to be set to avoid urban spread - there is such a limited amount of arable land in our district which must be protected for economic and employment. The environment is a key consideration.</p> <p>Weather events are becoming more extreme and council does little to nothing for those living outside of the city.</p> <p>People have to accept that the 'house and quarter acre section' is now an impossibility. We seem to have a population of 'homeless tourists' coming in to Gisborne to live in the hotels. Apartment living is one way to house these and low income families</p> <p>Council needs to look at what they are doing for the current population and their needs first - not just the urban dwellers. There is a very much a 'left hand doesn't know what the right hand is doing' approach. To protect urban areas they have increased the flooding in the flats. Some areas have had stop banks increased in height, while others have had the roads raised several times, exacerbating the flooding. No resilience preparation is being done by Council. There seems to be little appreciation for those who live rurally despite the positive contribution they make to the economy. Expanding the city limits would be disastrous (though it might get some flood prevention/drain and creek cleanup finally taken seriously) as these areas employ many people. Council also needs to be reminded of the rural populations rates contributions - many of the facilities paid for by the rural population</p>

					are not used by them. Building up, rather than out would ensure some usage.
28	Kerry Haraki	Y	I don't know	Y	Taiao first, all else follows from that Huge scope for city centre intensification of housing
30	Leo Garcia	Y	Y	Y	I like the idea of intensifying the city and more cycleways. Good areas to intensify. Would love to see the trainline reconnecting Napier. Also, will the path of the logging trucks change if we intensify some part of the city and have more residents on their current roads??
31	Sharon Cornwall	Y	Y	Y	
32	Jan Koia	No	No	No	We need to ensure infrastructure within the city is fixed before implementing any growth strategy. The inner city has some original homes from the beginning of last century these should be looked after and kept how they are. Intensification in a city like ours unless I would like to know how many people voted for and against intensification. We should be encouraging safe places to play that are free and walkable. It comes with a requirement for plenty of greenspace for families to use.
33	Gillian Ward	Yes	Yes	Yes	<p>The intensification approach is compatible with 15 minute city planning, ensuring that facilities, schools, shops, etc are all accessible within a 15 minute walk or cycle.</p> <p>I am aware that the Active Travel Strategy is being developed concurrently with the FDS, but the FDS Access and Mobility Infrastructure plan should match the plans in the Active Travel Strategy.</p> <p>The importance of retaining and reinstating active travel infrastructure, such as pedestrian bridges and rights of way, should be noted in the FDS. These links are important for a connected active travel network, making it practical to access recreational facilities, shops, schools, work places, and all the community facilities easily by walking and other active travel means. At least three pedestrian bridges have been removed or have had access stopped in recent years - over Kopuawhakapata Stream (Parau Street to Crawford Road), Waikanae Stream (Banks Street), and Taruheru River (Makaraka Cemetery to Taruheru Cemetery). Opportunities for active travel links to be formalised have been lost with subdivisions and resumed unformed legal roads. Once lost, these links are difficult to reinstate. In future, private car ownership will be less commonplace and active travel will become more normal, so planning useful links and maintaining existing connections is important. Developing safe active travel infrastructure is relatively inexpensive compared to infrastructure for vehicles on the road, and this should be a priority for the FDS. This is an equitable goal because active travel is generally not expensive for residents, and shared paths provide safe access for people using mobility scooters as well. Active travel is healthy and a low CO2 emissions option as well, all appropriate goals for the FDS</p>

34	Brian Eddy				Housing and Forestry. No comments made on the FDS
35	Karen Eddy				Housing and Forestry. No comments made on the FDS
36	Jodie Clarke	No	No	No	<p>If this is land to be developed for sale to the public then yes. If it is land for Kainga Ora , state housing or other government housing then no Thankyou</p> <p>Your objective is not clear. I would like reassurance that this land development is for the public to purchase and develop not New Zealand Government to put more state housing everywhere</p> <p>After looking at "Special scenarios" I notice you have the Riffle range" out Sponge bay as Māori led development. Can you clarify for me if this is a scenario or really is being developed privately from some Māori iwi/ development trust. I am not sure if you are hypothetically saying you want this to happen one day or it is already happening.</p> <p>If so ild love to sell my property before multiple state homes pop up. This will affect the value of my home and every other home in sponge bay</p>
37	Lillian Ward	Yes	No	No	<p>Infrastructure upgrades are needed first & foremost to cater for not only what we have now but also future growth. We must stop polluting our waterways & moana with sewage waste when we have extreme weather events because our infrastructure can't cope.</p> <p>Is not Taiao friendly. If we are planning for the future is it wise to encourage growth centrally given tsunami inundation mapping?</p> <p>We all must do better with our Taiao. I reccomend that new properties have their own water & sewage tanks & if possible support current property owners to also invest in their own sewage system & water tanks inclusive of rural property owners that already have these but are likely to be upgraded. Perhaps a personal sewage system that generates gas to cook with? A move to more te taiao friendly & sustainable way of doing things is definately needed.</p>
38	Angela Stuart	Yes	Yes	Yes	<p>Having an overarching framework of objectives sets the expectation and approach to change</p> <p>I don't think it is a good idea to move into the coastal areas given climate change. I do support in filling so long as it is a considered and controlled approach with services keeping pace with development</p> <p>As mentioned I support more intensification in the city and existing suburbs so long as the services including public transport are upgraded in line with developments</p>
39	Mr Meng Foon	Don't know	Don't Know	Yes	Zone Tatapouri camp and Dive Tatapouri residential
40	Diane Taylor Survey Gisborne Limited	Yes	Yes	Yes	<p>On the whole. The main focus is on urban and the Future Development Strategy dates back to 2015. As a food productive region appropriate provisions for new housing / accommodation on land zoned interim highly productive land needs to be provided for. The urban strategy on the whole is great. Providing that the infrastructure to support intensification is or will be affordable. If not - how.</p>

41	Lois Easton	Yes	Yes	Yes	I support intensification including of lifestyle areas. I support protection of HPL. love that no growth at Wainui is provided. Will support the city centre. Creates a more climate resilient community.
42	Rain X	Don't know	Yes	Yes	
43	David Skelton	No	No	No	growth will never in any place in the world until everything is ruined - stop growth stop growth no growth- causes fights unemployment is on the rise, why you want to bring people - everywhere in the world has turned shit when you add more people - you cant even satisfy the people that here, you are open sewage into the river and the roads are stuffed
44	Ingrid Derbyshire	Yes	Yes	Yes	We need to save our productive land to feed our people. We desperately need more homes for our own people. We need to get some life into the centre, as it's unkempt; dirty & unloved. Doing something about all the empty shops. Having tenants living upstairs above the shops improves security and pride in our town. GDC needs to do more than advertising on television about how deprived we are; do we need to tell the entire nation? They'll probably tell us to pull our socks up. Charity begins at home, please shop local instead of Auckland; Australia and any else outside of Tai Ra Whiti. Could we have a target date to empty all the motels of people in emergency housing please? Why doesn't Gisborne have any proper emergency housing?
45	Brad Ledger	No	No	No	Ruining our housing price Ruining our neighbourhood Ruin our safe community No thank you, you will devalue the housing prices in Spongebay and make it more of a target for robberies which have already increased lately
46	Nikki Clarke	No	No	No	Redevelopment of Airport land will hinder Gisbornes future growth for the Airport itself. Also developing the airport land and selling to Kianga Ora/housing NZ makes an already low income area of Elgin worse- leading to higher crime rates. No to airport development. No to sponge bay development as it will worsen the waterways and its a water catchment area Intensify a little bit in all areas, but not on large emptee land areas as those areas end up being sold to NZhousing and this creates areas of higher crime, and less integration Once again No to sponge bay development. No to airport development.
47	Susann Leslie	No	Yes	Yes	We need to consider the environment first, especially after all the bad weather in the past year Environment first The city needs more people. At the moment, it is too sprawling and few people live in the city centre
48	Janine Koia	Yes	No	No	Do we need to be a high rise beach city? No we dont. We talk about being a place that is unique intensification just makes us like the other beachside cities Gisborne needs to look at how we want our community to be and interact and thst is not through intensification. Dispersed growth is not ideal but a much beyter option than intensification. Look at all the businesses on Awapuni Road and the industrial subdivision no foresight with that decision. New industries need to be reallocated outbof vity boundaries.

49	Xinen He	Yes	I don't know	Yes	Population is growing a lot More houses needed for our region, so the house price is affordable for everyone
50	Patricia Maclean	No	No	No	I can see cheap housing going up around inner Gisborne and I think with so much vacant land around Gisborne-excluding Poverty Bay flats we could utilize outlying areas and keep a higher quality of well built housing that lasts and doesnt turn into ugly y I think it needs to be slowed down and really planned and so that in 100 years it was well placed still workks and people are not living on top of each other. No as above why would we want this city squashed into a small area creating a whole set of new problems-definitely not how most people want to live I am most opposed to intensification-this is what has happened in China and it's a sad miserable way for people to live-we need to plan a city with spaces and NOT cramp our living situation into a small space! As far as growing upward, not one person I have spoken to about this is keen on this happening, so surprising you would say that was your feedback.
51	Mel McIntyre	Yes	Yes	Yes	Keep our fertile soil safe for growing Gives different options for where people want to live
52	Toby Parker	Yes	Yes	Yes	We need more housing to support growth. It's more cost effective v to intensify where possible. I think it's important to also keep larger sections for kids to play outside. It's a fast and cheaper way to get more housing and improve on what we have. I think lots of large and spacious appartments would be great way to accomodate large amounts of workers for businesses. Creating much more accomodation within the city will generate more rates within the existing infrastructure. More people and culture in the city will make restaurants more sustainable and the city more social making it more attractive to live here.
53	Rangimarie	No	No	No	Tower blocks are awful for our whanau sad places to live. It will turn into slums like the UK, tenement buildings, dark alleys, dingy staircases and broken lifts..dont do this to Gizzy Dont go up, tower blocks are miserable places, we have plenty of land not suited for growing, this can be used for decent housing. Dont put our people in these boxes thats not life. They turn into sad places reallly quickly..dont be like the UK, be like Scandinavia build decent homes with gardens. Not hell hole tower blocks. Be sad to see this happen to our lovely town, dont turn us into slumtown
54	Dan Shenton Te Tūāpapa Kura Kāinga - HUD	Yes	Yes	Yes	We would like to acknowledge the Council, iwi partners and the contributors in preparing the Future Development Strategy. We also acknowledge the ongoing engagement with iwi in developing the draft Tairāwhiti Future Development Strategy 2024 -2054 (Tairāwhiti FDS); and in particular the development of the overarching objectives guiding the strategy, and the Tangata whenua overarching aspirations and values framework. We can see that there has been a robust process to produce a growth strategy that aligns well with the policies in the National Policy Statement on Urban Development, and is a similar level of intensification that Tier 1 & 2 councils have had to implement in response to the Medium Density Residential Standard (MDRS), i.e. enable 3 storeys in most locations. But within the Tairāwhiti FDS the Council is

				<p>being more selective and focusing on infill around key centres and main transport routes, which we consider sensible and most likely to be realised over long term.</p> <p>Current Māori housing projects</p> <p>We consider that the Tairāwhiti FDS will not impede on current programmes of housing investment from Te Tūāpapa Kura Kāinga and Te Puni Kōkiri in the region, particularly in relation to the Tairāwhiti Whai Kāinga Whai Oranga prototype with Toitū Tairāwhiti Housing Limited. The FDS focusses on greenfield and urban growth within the Gisborne township area (as outlined in the map on page 9). The urban settlements and coastal and rural areas section of the FDS (p.17) also undertakes that – “Most new homes developed are anticipated to be stand- alone dwellings, with attached dwelling types not typical of smaller settlements such as these. The TRMP will continue to enable and support housing choice.”</p> <p>Potential areas within the FDS that should be strengthened</p> <p>There are however some areas that that we consider should be strengthened within the FDS, as outlined below -</p> <ul style="list-style-type: none"> • Housing Affordability – generally appears to be missing from the narrative in the Tairāwhiti FDS. Its only referred to in a couple of places. It would have been good for the Tairāwhiti FDS to include more discussion on housing affordability and how the Tairāwhiti FDS could support it. The main way an FDS can improve affordability is by supporting an abundance of housing supply, while at the same time encouraging diversity of housing types across all locations. Although the Tairāwhiti FDS will support this through the intensification strategy (which should support smaller housing typologies) stronger reference could be made with more intentional signals and direction on housing affordability in the document. • Infrastructure capacity – like most urban areas across NZ, infrastructure is the main constraint to growth. You have done a good job at assessing infrastructure capacity with a lot of detail about the funding and sequencing of the infrastructure upgrades needed. But there is a significant reliance on infrastructure to support growth that is not funded yet. It would have been good to see the infrastructure and growth strategy more integrated; are there any priority areas where investment in growth and infrastructure could be coordinated? Identifying priority areas or a sequenced approach would give developers more certainty and enable infrastructure upgrades to be more aligned with the areas they anticipate to growth first. • Future Māori housing developments: We acknowledge the outlining of three specific Māori housing development opportunities (on p.10), which if realised will provide substantial housing opportunities within or close to the Gisborne central business district. This was good to see. However, the Tairāwhiti FDS was short on the relationship between these identified developments and whether they will be enabled and included within identified growth areas – outlined on page 6. All three sites appear to be outside of the greenfield expansion or intensification areas. It would be useful if the FDS either includes them within those areas or provides justifications as to why they are not. • Impacts from climate – and erosion issues are outlined on page 25 and other parts of the FDS – but are somewhat underplayed in terms of the current and ongoing impacts on housing growth, and need to be better linked
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					<p>to resilience and mitigation planning being planned or occurring in the district. There is recent evidence (gathered by NIWA and local scientists here - In the wake of Gabrielle NIWA) and learnings from the past year following Cyclone Gabrielle that could also be better reflected within the Strategy.</p> <p>There is also little mention about the growing need for managed retreat in areas often hit by flooding and new areas that have been impacted – Te Karaka etc. It would be good to link this to discussions that local communities are currently having about managed retreat, within the context of the implementation of the Land Categorisation - Future of Severely Impacted Land (FOSAL), in Te Tairāwhiti.</p> <p>In closing, we consider that further thought be given to strengthen the response and impacts on housing from climate change within the FDS, in-line with our feedback above.</p>
55	Joanne Schwenke	Don't know	Don't Know	Don't know	<p>I haven't got time to read 49 pages and absorb everything. All I know is KO are popping up everywhere in Gisborne. Is Gisborne going to be a KO city???? Why weren't any KO houses built down by the Flying Nun, before the lab was built there???? There could of been streets of houses built there. Like suburbs in Auckland. Papakura being just one area, where Ardmore was once upon a time</p> <p>Going by address, KO is building a 10 unit complex. We were initially told the building was for Government employees. Now there is a big sign advertising KO housing. Very dangerous for children that will be living there, right on a main Rd/corner. 10 units @ 2-4 bedrooms. Only space for 6 car parks. The other 4 units have to park on the road. And only planned for one car park for 6 homes, didn't take into consideration, some households will have more than one car. The GDC are the only winners here. Why???? GDC will get a lot of revenue from tickets they will be issuing to those that live there and will have to find an alternative parking closer to their unit. It's happening all over with these hi density housing complexes. Developers, have no provisions for the parking situations. Maybe a underground parking would of been good. But NO!!!! That would be too expensive and GDC will have to find revenue elsewhere. That's all part of the long term plan</p>
56	Karen Mackill	Yes	No	No	<p>Most of the areas chosen for development are near waterways and a high risk of flooding Most of the areas selected for development are on or near waterways and will be flooded in the future.</p> <p>Given the events of 2023 it is clear that major flooding events will occur in the near future. The GDC building was very close to being flooded. The Council should be planning for staged retreats of the Gisborne CBD and all coastal communities to higher ground. Prime agricultural land should be protected from residential and industrial development. Sea levels are rising and we have already seen how climate change is affecting the weather patterns in this country and the world. The next large flooding event will probably happen in the next decade as water tables and sea level rise and erosion increases. Raising stopbanks will not prevent a major flooding event. A staged retreat needs to be planned now to start within the next 30 years and not wait for total devastation to force a move.</p>
57	Peter Crawford	I don't know	I don't know	I don't know	<p>It seems to benefit property developers who would have already invested. Just not sure our infrastructure proposal.</p>
58	Lisa Christensen	Yes	No	I don't know	<p>I agree that te ora nga o te taiao is imperative. I am happy to see that protecting the</p>

					<p>environment first, before considering growth and development, is the intention set out at the beginning of this document.</p> <p>I prefer option four: western greenfield growth and intensification. Kaiti requires massive infrastructure improvements (water, sewage) before intensification can occur there.</p> <p>I agree in principal. Intensification is necessary. I am concerned about the consultation processes and am not confident a "nuanced approach" will be achieved.</p> <p>Tuatahi, me mihi ka tika ki a koutou kua pukumahi i runga i tēnei kaupapa. I acknowledge those who had input into this draft document. It is comprehensive and has some strong visions for positive outcomes, for both te taiao and the people of Te Tairāwhiti. I am interested to see how te oranga o te taiao, as the overarching framework of objectives, will be embodied in the intensification and new builds that are necessary to achieve the housing we need here in Tairāwhiti. It is a lofty goal that we humans are very good at not achieving. I am also concerned about how the new government's potential changes/repeal of the RMA will affect the decisions made here at council level.</p> <p>I remain hopeful that GDC will engage with the communities and tangata whenua where the planned intensifications and new builds take place, taking care to hear their concerns and visions for how their neighbourhoods are best designed and planned. Councils often forget there is a wealth of expertise in the people, sometimes generations of lived experience, who call these neighbourhoods home.</p> <p>Tēnā koutou katoa. Thank you for your important mahi and for the opportunity to provide feedback.</p>
59	Daniel Robinson	Yes	Yes	Yes	Yes, infrastructure needs to be updated and improved, especially around the kaiti, cbd areas.
60	Kelsey Goldsmith	Yes	No	Yes	<p>Gisborne has limited green spaces already so it is important that these areas are protected first, before considering any new property development. Cities need green spaces in order for the community to thrive.</p> <p>Option 3 sounds better. Keep a mix of intensification in urban areas as outlined in option 1, however, more houses should be built from Kaiti towards wainui to give people more housing options if they don't want to live in and apartment in the cbd.</p> <p>It is important for the council to have clear boundaries and principles for intensification to ensure it is well planned and that we do not over-intensify the city.</p>
61	Brendon Liggett Kāinga Ora – Homes and Communities	Yes	Yes	Yes	See below
<p>Executive Summary</p> <p>1. Kāinga Ora- Homes and Communities ("Kāinga Ora") welcomes the opportunity to provide feedback to the draft Tairāwhiti Future Development Strategy ("FDS").</p> <p>1. Kāinga Ora is supportive of this FDS and the Gisborne District Council's ("the Council") work to date to produce the FDS.</p>					

1. The strategic approach of focusing most development in Intensification Areas is supported and will be a key part of Tairāwhiti adapting to a more resilient future and delivering housing choice for local people.
1. Kāinga Ora is also aware of the significant and ongoing challenges Tairāwhiti faces as a result of Cyclone Gabrielle. While the recovery work and planning is of most importance right now, the FDS provides a long-term roadmap for the growth and change of Tairāwhiti/Gisborne over 30 years beyond the current recovery phase.

As such, Kāinga Ora look to provide constructive feedback on the draft document. This feedback covers six main topics: Strategic Objectives

Future greenfield allocation
 Staging of growth and infrastructure delivery
 Affordability
 Outcomes for Māori
 Business land and structure of centres

Background to Kāinga Ora and its interests

1. Kāinga Ora was formed in 2019 as a statutory entity established under the Kāinga Ora Homes and Communities Act ("the KOHC" Act"). As a Crown Entity, Kāinga Ora is required to give effect to Government policies. Kāinga Ora has two key roles:

- . Being a world class public housing landlord; and
- . Leading and co-ordinating urban development projects.

Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:

- . Provide people with good quality, affordable housing choices that meet diverse needs; and
- . Support good access to jobs, amenities, and services; and
- . Otherwise sustain or enhance the overall economic, social, environmental, and cultural well-being of current and future generations.

Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land within Tairāwhiti/Gisborne District.

The public housing portfolio managed by Kāinga Ora comprises approximately 1309 properties (as at 31 December 2023). There are 629 people on the public housing waitlist for Gisborne District (including 129 for the East Coast and surrounding area). The public housing waitlist for this area has grown significantly in the last five years.

Kāinga Ora is interested in all aspects of the FDS that may affect the supply and range of housing in the market, including affordable housing, and the creation of thriving communities within an urban form. These include:

- . Minimising regulatory barriers that constrain the ability to deliver housing development (particularly for resource consenting and infrastructure),
 - . The provision of public housing to persons who are unable to be sustainably housed in private sector accommodation,
 - . Supporting and enabling greater housing choice through a range of tenure options for the growing population who find themselves needing additional assistance,
 - . Supporting and enabling the aspirations of Māori in relation to housing and urban development,
 - . Leading and co-ordinating inclusive and integrated residential and urban development projects,
 - . The funded and programmed provision of services and infrastructure and how this may impact on all housing delivery,
 - . Working with local authorities to ensure that appropriate services and infrastructure are delivered for its developments;
- and
- . Ensuring all residents have safe, flexible and convenient access to an array of opportunities, including employment, services, recreation and education.

Summary of Feedback

The purpose of this submission is to outline support for the FDS, and provide feedback on six key aspects of the draft Future Development Strategy that Kāinga Ora consider need further consideration.

Kāinga Ora recommend further work is undertaken to:

- . consider rephrasing the Overarching Objective,
- . consider removing the Reserve Greenfield Expansion Areas (Long-term),
- . align the growth expected in the growth areas with necessary infrastructure investments,
- . address how intensification can deliver relatively more affordable housing in Tairāwhiti,
- . address outcomes for Māori within Tairāwhiti, and
- . include centres and business land as an integral part of the growth strategy.

The following sections of the submission will provide further explanation of these key points.

• Support for the draft Future Development Strategy ("FDS")

Kāinga Ora is supportive of the work undertaken by the Council for this FDS acknowledging that Tairāwhiti/Gisborne is a Tier 3 Authority under the NPS-UD, and that developing a HBA and FDS are optional activities. As such, Kāinga Ora commends the Council on completing a draft FDS, and the strategy direction that has been developed.

Kāinga Ora also recognises that the Council's operating environment is very challenging in terms of managing the recovery from a number of extreme weather events, including Cyclone Hale and Cyclone Gabrielle in January and February 2023. The Council and the region are still involved in recovery phases of work, and this includes non-standard Long-Term Plan (LTP) processes.

In general, an FDS is prepared in advance, or alongside, a LTP to inform the funding decisions to manage growth. With the Council preparing "Our Three Year Plan 2024-27", Kāinga Ora appreciates the opportunity to submit on the draft FDS, while recognising that the process will revert to general LTP processes in due course. As such, this FDS is well-placed to provide direction to growth and investment planning in both the recovery and post-recovery phases.

Kāinga Ora would also like to highlight the Implementation Plan as a key next piece of work. Given some of the challenges that are understood, and also some raised within this submission, an Implementation Plan will be critical. Kāinga Ora is keen to stay connected with the Council as this work progresses.

- **Strategic Objectives**

Kāinga Ora is supportive of the FDS establishing a clear strategic structure for future development. These structures are able to provide direction to RMA processes, but also other city and region shaping planning processes. An overarching objective can be appropriate, and the FDS makes good use of Te Taiao, He Tangata, and Development as the sub-headings to the objectives.

Kāinga Ora does however highlight a potential issue with the Overarching Objective. In the current format, this objective reads as a bottom line, and conveys a significant expectation that all development will positively impact Te Oranga o te Taiao. While Kāinga Ora recognises the importance of Te Oranga o te Taiao, and working towards ensuring development does not deteriorate the environment; especially after Cyclone events, in practice the wording of the Overarching Objective is likely an unrealistic and difficult outcome to achieve for every land use activity, development or resource consent process. These processes often involve balancing competing outcomes.

Furthermore, Kāinga Ora notes that the Objective as written does not align with how it is defined under "Achieving the objectives" on Page 25, which states the Overarching Objective is achieved by "working towards the other objectives as a whole". Kāinga Ora suggest that this more holistic view is likely to be a more practicable solution.

Kāinga Ora also note the phrasing of the Overarching Aspiration from Figure 3: Tangata whenua overarching aspirations and values framework which refers to a "harmonious coexistence of vibrant communities and a thriving environment".

Kāinga Ora can lend support to any revision processes the Council embarks on, to finalise the FDS.

- Future greenfield allocation

1. Kāinga Ora understands the projected growth and development areas identified within the FDS to be as follows:

Area for development in the FDS	Growth (supply of dwellings)
Intensification	4,300
Current Greenfield areas (Total of Existing zoned and Rural Lifestyle)	1,350
Existing zoned	780
Rural Lifestyle	570
Total	5,650

Kāinga Ora is generally supportive of this approach with approximately 75% of all growth expected within the existing urban area. Kāinga Ora considers this to be an appropriate way to deliver and contribute towards vibrant and supportive communities.

Kāinga Ora highlights the Reserve Greenfield Expansion Areas (Long-term) as a potential issue. These areas provide surplus housing beyond what is required to meet demand in the 30 year period (including competitiveness margin) and are in addition to those identified growth areas listed in the table above. These areas are shown on the maps, and explicitly outlined on Page 15. The potential growth reported for these areas is up to another 1,600 dwellings.

Kāinga Ora does not consider that these Reserve Greenfield Expansion Areas (Long-term) parcels need to be included within the FDS at this time. The FDS lays out a sufficient growth approach that is able to provide for a range of housing options, aligns with existing urban areas and is able to best utilise investment in existing infrastructure. An expansion of the urban area to include these land parcels – even over the long-term – would likely be to the detriment of the existing area and the proposed strategy in the FDS. There is a strong possibility that future greenfield growth areas would draw resource and funding, particularly for infrastructure, away from those other areas identified for growth – both intensification areas and existing greenfield areas.

Furthermore, these areas are not well serviced currently by transport options or local services and amenities to support future communities and emission reduction outcomes. In order to promote well-functioning urban environments these areas would require a significant level of investment into public infrastructure. If Council were to advance these areas, Kāinga Ora would like further clarification on Council's planning for these additional services.

- **Staging of growth and infrastructure delivery**

Kāinga Ora is aware and acknowledges the challenge of recovery planning, including the process around "Our Three Year Plan". However, the FDS is most useful to developers, partners and the communities, when it is able to set a clear direction of when and how growth will happen. Kāinga Ora supports the enablement of the zoning framework as quickly as possible to allow for any existing capacity to be utilised to its fullest extent.

As such, staging and timing of the required infrastructure investment to support growth areas is critical and should be completed as part of this FDS. While there are some implementation timeframes associated with the infrastructure portions of the FDS, these are not well connected to the growth areas. It is also noted that not all sections are complete with costs or timing.

The additional challenge of the infrastructure components in the FDS is that many required investments are not funded, and therefore the growth is not currently supported by the required infrastructure.

Kāinga Ora encourages the Council to do further work in aligning the growth expected in the Intensification Areas with the necessary infrastructure investments. This would provide clarification to the maps as to which areas are prioritised for initial investment.

By establishing clear commitments and timing, Kāinga Ora, and other partners, would then be able to align and time their investment to these locations. This would stretch beyond just investment in housing, but also other infrastructure and services.

- Affordability

Kāinga Ora views the FDS to be lacking significant commentary regarding affordability, and in particular, how the strategy of intensification can deliver relatively more affordable housing in Tairāwhiti/Gisborne.

Kāinga Ora views this as particularly relevant given the affordability challenges expected in Tairāwhiti/Gisborne. This is most acutely shown via Tables 2-6 and 2-7 of the HBA that detail large increases in small, single and couple only households, and households that earn under \$30,000 and \$50,000 per year.

At a high level, higher density housing options are generally able to:

- deliver greater housing choice and more affordable housing in comparison to less dense options, due to smaller size dwellings and more efficient use of land;
- utilise existing infrastructure and services, including pipe network infrastructure but also schools, parks, health facilities and supportive services; and

support residents to have greater transport choice. This manifests as improved public transport viability by increasing the potential catchment of those services, as well as greater walkability or use of active modes. This in turn reduces the expense required to travel by private vehicle.

There are other benefits of higher density housing and intensification that are not detailed that would also be relevant but not listed here.

Kāinga Ora considers the affordability challenges for Tairāwhiti/Gisborne will continue, as highlighted by the information as part of the FDS. As noted above, infrastructure supply is not confirmed or funded in full, and as such, if this cost is passed in full to the developer, cost of housing will continue to increase. This issue is particularly acute in delivering greenfield developments.

There is also an issue of ensuring that the housing envisaged to be delivered under the FDS, is appropriate to the growing demand of the households, especially those smaller and lower income households. Kāinga Ora is experienced in this challenge and can engage directly with the Council to further discuss this issue.

Kāinga Ora suggest that the FDS is more explicit in explaining the benefits of higher density housing options and therefore the improved relative affordability of undertaking an approach based primarily on intensification in appropriate, well serviced locations.

• **Outcomes for Māori**

Kāinga Ora recognises the work that the Council has put in to developing the FDS with Māori partners, particularly the Ngā uara me ngā wawata o ngā iwi me ngā hapū. Kāinga Ora remains a committed partner to delivering for and with Māori. As such, Kāinga Ora wish to highlight two aspects.

Firstly, Kāinga Ora supports the Māori-led development section on Page 10. This highlights the three key growth areas that involve Māori. Kāinga Ora suggests the FDS include further commentary as to outcomes for Māori within Tairāwhiti, rather than just a focus on Māori-led development. This would be particularly useful for the discussion around intensification, and what improved infrastructure would mean for achieving local Māori aspirations.

Secondly, Kāinga Ora is aware that there are different views held within the Māori community regarding intensification. Kāinga Ora suggest that the Council recognise this and look to undertake further work to establish the benefits of the proposed growth strategy in the FDS. Kāinga Ora can also assist the Council when undertaking this work.

• **Business land and structure of centres**

Kāinga Ora understands that the FDS does not currently address business land considerations as the existing supply of business land will meet the needs of Tairāwhiti. However, while this is appropriate from a strategic land perspective in responding to the sufficiency within the HBA, Kāinga Ora views that the FDS is weakened by not further exploring the role of centres, and associated business land.

Kāinga Ora note and supports the intensification principle on page 13, to "Strengthen neighbourhood commercial centres through improved density and a mix of land uses". However, despite being an intensification principle, the centres and the role of a centre to support growth are not acknowledged in the strategy.

As such, Kāinga Ora suggests that centres are identified and included in key maps, such as Figure 6: The Strategy – Growth Areas, to show how they are supportive of such growth. This should then be accompanied by the role and function of particular centres, and any change that is necessary to support the growth. As an example, the supporting text for principle 2 on page 13 refers to future growth in Elgin and surrounding areas being supported by a potential expansion of commercial or mixed-use zoning. This is not shown on a map and is not connected to the strategy of the FDS.

Kāinga Ora suggests that incorporating 'centres' into the structure of the growth areas will strengthen and enhance the overall approach to intensification. Additionally, this can then be further explored as to what the expected lifestyle of people in these areas will be – rather than just the exploration of changing block patterns shown in Figure 7 and Figure 8.

Conclusion

Kāinga Ora will be available to discuss its submission and to address the matters raised above. Kāinga Ora is committed to working collaboratively with the Council on the development of the FDS.

62	Carolyn McAlley Heritage New Zealand Pouhere Taonga				See below
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Submission points of Heritage New Zealand Pouhere Taonga to the Gisborne District Council Proposed Future Development Strategy (draft Plan)

Draft Plan- Support or Oppose
Provision number
Draft Tairāwhiti Future Development Strategy

Relief sought

<p>How does the FDS influence the TRMP? Page 6</p>	<p>Support</p>	<p>HNZPT notes the statement on page 6: <i>"The FDS signals changes needed to the Regional Policy Statement and District Plan to support urban growth and development in Tairāwhiti."</i> that identifies the connection between the development of this Plan and the Tairāwhiti Resource Management Plan (TRMP) that contains the objectives, policies, rules and zonings required to achieve the required growth and development.</p> <p>HNZPT therefore considers that it is important that the FDS contains an appropriate level of information and guidance regarding the matters that have to be considered at the time of the review of the TRMP. This submission will raise a number of matters related to historic heritage that HNZPT considers should be given a greater level of regard in the FDS, to ensure an appropriate level of protection is achieved into the future.</p> <p>HNZPT does have concerns that this Plan has chosen to not give sufficient regard to the nuanced nature of the range of historic heritage in so far as it may be a constraint to the location of growth and development. HNZPT considers that a greater range of historic heritage could be included in Appendix 1 of the Plan, as a constraint to growth and development, for example. This would assist to give greater direction at the time of the amendments to the TRMP and the development of the policy and rule framework.</p>	<p>That the statement is retained.</p>
<p>HNZPT is aware that currently there is investigation and research being undertaken with regard historic heritage and this work is still to completed, to contribute to the upcoming review of the TRMP. HNZPT considers that there would have been greater benefit in this work being completed prior to the notification of this Plan to better inform the development of this plan and the consideration of constraints.</p>	<p>Support</p>	<p>HNZPT supports the FDS being prepared on collaboration with Iwi and hapu who have expressed an interest in the process. HNZPT also supports the use of the Iwi technicians' group¹ and notes that the associated technical report states that the Iwi technicians group advises² that further consultation is required regarding the nature of some of the proposed growth areas.</p> <p>HNZPT supports that the group will be retained in their review and development role for the upcoming district plan process.</p>	<p>That the statement relating to the continued consultation with Iwi technicians' group is retained</p>
<p>Iwi and hapu values and aspirations, Page 5 FDS, (also see technical report - section 5) Constraints and opportunities Page 6</p>	<p>Support in part</p>	<p>HNZPT welcomes the general discussion at page 6 of the FDS relating to constraints and opportunities that are to be considered at the time of development. HNZPT appreciates that this page is a high-level discussion, however, is concerned that there is no inclusion or mention of "cultural" constraints that are also included as discussed in Appendix 1 to the document. These types of constraints will be complex to deal with and should be highlighted in this early discussion section of the Plan as an alert to the users of the FDS of an additional matter they may have to consider at the time of development, including allowing time for consultation as appropriate.</p>	<p>That the discussion is amended to better reflect the full range of constraints that are identified in Appendix 1- Strategic Opportunity and Constraints Sieve maps, in particular the consideration of cultural matters, including the amendments sought later in this submission regarding the content of the cultural matters' discussion.</p>
<p>Overarching Objective / Other objectives Page 7</p>	<p></p>	<p>HNZPT is supportive of the overarching and other objectives, which will guide the growth and development of Tairāwhiti into the future. However, in the context of its interest in conserving historic heritage HNZPT considers that greater emphasis should be given within the objectives to the use of the existing built resource.</p>	<p></p>

The Strategy Page 8	Support in part	<p>The retention of the existing building resource through adaptive reuse has been successfully undertaken in many instances in the City Centre to date and HNZPT this approach continues, as the retention of the heritage buildings in the city centre will ensure its ongoing unique character. Such an approach would assist to ensure the retention of the historic heritage resource, in addition to lessening the need for ground disturbance in what may be sensitive locations in the central areas of Gisborne.</p> <p>To reflect this discussion, HNZPT considers that the first part of the "he tangata" objectives should be amended as should the last part of the "Development" objective.</p>	<p>That the discussion on the "strategy" is retained and amended as follows; <i>"Apartments and more intensive urban form of housing, including reuse of existing buildings, to be concentrated within and around the City Centre."</i></p>
Growth areas- Adaptive reuse Page 11	Support in part	<p>HNZPT appreciates that it makes sense to intensify within and around the city centre"3 as this location contains numerous services, employment opportunities and access to transport. However, this is also the location of numerous GDC scheduled and HNZPT listed buildings, and other historic heritage sites including a range of archaeological sites. HNZPT considers that the existing heritage buildings can be adaptively reused to assist to accommodate some of the required growth, indeed there could also be other buildings that could be repurposed or adapted.</p> <p>Therefore, HNZPT seeks that the FDS is amended to recognise the contribution that reuse of buildings could contribute to accommodating future growth in the population.</p> <p>HNZPT considers that adaptive reuse of heritage buildings is a sustainable method of managing the heritage building stock, while providing additional dwelling units for the growing population.</p> <p>For historic heritage buildings HNZPT could support adaptive reuse, with the intent to intensify an historic place into two dwelling units. However, because HNZPT regard the interiors as an important part of a heritage place, we consider that special attention would have to be utilised to preserve the interior, fabric, features and spatial integrity. Consideration would have to be given to the internal logic of the heritage place and the exterior requirements such as access and parking should be given care and attention so as to maintain the spaciousness of the original large site as much as possible.</p> <p>HNZPT considers that the development of design guidelines that reflect the information above, would assist in achieving the best possible outcomes at the time of adaptive of an existing building into two or multiple dwelling units.</p>	<p>That the objectives are amended as follows; <i>Te Tangata "Growth and Development encourages and where possible, facilitates the delivery of houses of a size and form, including adaptively reusing existing housing stock or buildings, that meet the diverse requirements of the people of Tairāwhiti."</i> <i>Development Growth does not occur on highly productive land or other finite resource such as identified cultural sites of significance historic heritage</i> That the FDS is amended to include an indication of proposed lot sizes, using either Figure 7: Types of Intensification on page 11, or Table 1: Anticipated</p>
Growth Areas Zoning and size of lots Pages 11-12	Oppose	<p>HNZPT is concerned that while the FDS makes considerable mention of "intensification" it does not define this term and provide any specific detail with regard proposed site sizes, leaving that detail to the review of the TRMP. HNZPT considers that there must be some awareness of the potential size of sites required for the provision of the projected growth, as these figures are required to understand the nature of infrastructure provision and so on.</p>	<p>That the FDS is amended to include an indication of proposed lot sizes, using either Figure 7: Types of Intensification on page 11, or Table 1: Anticipated</p>

<p>Table 3- FDS Key Actions Pages 27 & 28 Prepare urban residential guidelines .</p>	<p>Support in part</p>	<p>Without the inclusion of information pertaining to proposed or likely lot sizes it is difficult for HNZPT to be able to understand and advise on the likely impacts that "intensification" will have on historic heritage and if there are any possible ways to mitigate the impacts of the proposed intensification. HNZPT is concerned that any proposed zoning may not include sufficient consideration of both the historic heritage structure and its setting and surrounds. HNZPT considers that sufficient research needs to be undertaken to understand the nature of the resource and the possible impacts of intensification on historic heritage values. HNZPT considers that the FDS should "complete" the picture by advising likely proposed lot sizes to better enable all readers to understand the look and feel of the proposed intensification promoted by the FDS and the possible effects on the existing environment. HNZPT would welcome the inclusion of additional guidelines to those mentioned 4, including guidelines relating to the appropriate conversion of existing buildings, including heritage buildings, to accommodate additional growth or business opportunities. The use of an architect experienced in the conversion of historic heritage buildings to develop a set of guidelines for such conversions would be of considerable benefit in the retention of historic heritage values and as a cost saving measure for applicants considering adopting this type of approach. Additional guidelines should also include guidance on how to treat the heritage surrounds at the time of placement of other buildings or splitting an existing house/site in two. HNZPT seeks a small amendment to the table to acknowledge this additional type of guideline.</p>	<p>intensification provision on page 12</p> <p>That the Fig 3 Table is amended as follows; <i>Action Prepare urban residential guidelines, including for the adaptive reuse and conversion of historic heritage and placement of additional buildings on an historic heritage site.</i></p>		
<p>Appendix 1- Strategic Opportunity and Constraints Sieve maps- Cultural Proposed Appendix 1- Strategic Opportunity and Constraints Sieve maps-</p>	<p>Support</p>	<p>HNZPT supports the recognition in this "Cultural" map of the following constraints that are "potentially sensitive to the impacts of new urban development"⁵ that includes Marae, areas of waahi tapu, as well as area with extensive archaeological evidence of Māori occupation and whenua Māori.</p>	<p>That the Cultural Constraints & Opportunities map is retained.</p>		
<p>Appendix 1- Strategic Opportunity and Constraints Sieve maps-</p>		<p>HNZPT is concerned that the Appendix 1 constraints 6 map suites do not include all sites of cultural heritage value 7 reflected in the schedules of the current TRMP. HNZPT considers that all historic heritage matters should be considered with regard the retention of their values at the time of intensification. This consideration should be identified as part of the FDS as the FDS is one of the key documents to inform the development of the TRMP.</p>	<p>That an additional map is included into this suite of maps to recognise that historic heritage including built heritage and all archaeology may be a constraint to intensification.</p>		
<p>4.3.1- What the NPSUD requires & 4.3.2- Development constraints</p>	<p>Support in part</p>	<p>HNZPT observes that the technical support document for the FDS acknowledges the indirect guidance that the NPSUD makes in relation to the "types of matters that may be relevant when identifying constraints on development for the purposes of developing an FDS."⁸ The technical report lists the matters under sections 6 (e) and (f) from the Matters of National importance⁹ which includes Historic Heritage. These similar matters were considered as part of the Enabling Housing Supply Act, as qualifying matters-a reason for a reduction in the density requirements at the time of development under this piece of legislation. It is of concern therefore that the matters complied at pages 20/21/22</p>			
<p>63</p>	<p>Nikki Searancke</p>	<p>Yes</p>	<p>Yes</p>	<p>Yes</p>	<p>I agree with excluding Wainui. The Wainui Stream is at its capacity to support current storm water from Lloyd George Road with new</p>

					<p>storm water drainage through 41 and 51 Lloyd George road at its capacity under Rural Lifestyle zoning.</p> <p>I oppose all and any new residential housing in Sponge Bay, west of the current Sponge Bay Housing Estate. I oppose any proposed residential housing in the Rifle Range (Papawhariki-Tamarau), as all storm water drains to Wainui Stream which cannot carry excess storm water over and above the current levels. I am domiciled at 41 Lloyd George road and will be flooded by any increase to the current levels in Wainui Stream. I live on my tipuna Hinehaeretaua lands (from 1700AD). I will not relocate and recognise the increasing flood threat currently increasing. In 1976/77 Lloyd George Road and Sponge Bay including SH35 was impacted by a major flood. Peacock Report 2004? designated Lloyd George Road flood overlay/hazard zone.</p>
64	Todd Scrafton Iconiq Group			Yes	See below

Iconiq Group is a construction & development company that specialises in residential development, particularly terraced housing, and walk-up apartments, and has a strong presence in the Tairāwhiti region. Iconiq is committed to providing housing in Gisborne and has partnered with Kāinga Ora & iwi partners to address the critical housing shortage by providing higher-density housing than traditionally seen in Gisborne.

Iconiq Group is very proud of its track record in supporting employment and apprenticeship in the building sector in Gisborne. Whilst Iconiq welcomes the intensification focus taken by the FDS and the acknowledgement that Gisborne is faced with a significant housing shortage, Iconiq considers that the FDS could do more to provide for housing growth and have a greater focus on enabling greater density within the existing urban area, these aspects are discussed in further detail below.

Extent of intensification areas

Whilst the intensification areas identified by the FDS do align with a compact city approach and include key areas, such as the city centre and surrounding inner suburbs, it is considered that the intensification areas could be further expanded to safeguard a greater area for future growth.

Areas along arterial roads or within close proximity to everyday service and amenities should be included within the intensification areas. As an example, shown by the red circles in Figure 1 below, expanding the intensification areas along Gladstone Road and in Kaiti is considered a logical expansion of the already identified intensification areas and should be include as part of the growth strategy for Gisborne.

As a general comment, Gisborne has a relevantly small spatial footprint and even at the outer urban areas, homes are a relatively short distance from a wide range of amenities. The overarching objective of the NPS-UD (Objective 1) to ensure 'Well functioning urban environments'.

The NPS-UD also seeks to ensure that planning decisions improve housing affordability by supporting competitive land and development markets (Objective 2), and focuses on the identification and promotion of the future character/amenity of urban environments and their evolution over time (Policy 6), rather than protection and preservation of existing amenity, by promoting and enabling compact/efficient urban form and management of effects through good urban design (Objectives 1 and 4).

Iconiq considers that the NPS-UD requires a long-term approach to the provision of development capacity with urgency. This necessarily means in some cases, planning for growth spatially in-advance of definitive infrastructure provision and capacity in the short term in order to provide a clear spatial 'road map' for future development, intensification and infrastructure provision/investment. Such spatial planning should be 'forward looking' and not be unduly influenced by existing infrastructure constraints, which paradoxically can be alleviated and partially funded through the contributions and revenue that 'enabled' development will generate.

When such an approach is not taken, opportunities for meaningful redevelopment and intensification are lost, either through adherence to a less intensive form of development, or in favour of greenfield development that merely exacerbates the adverse effects of urban sprawl.

Iconiq considers that enabling intensification as-sought by the NPS-UD in a 'compact' manner, assists in giving effect to Policy 1(d) of the NPS-UD which seeks to: 'support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets' by ensuring that typically lower-density greenfield development does not remain a strongly preferred choice for the housing sector, by delivering a competitive advantage to intensification through encouraging development in strategic locations.

These areas include key arterial routes that provide direct access to the city centre and are located on local bus routes to provide alternative modes of transport. These key transport connections provide people with direct access to everyday needs and amenities within the city centre. Furthermore, Kaiti is considered to be well-supported by existing services and amenities located within Kaiti Hub, providing a range of shops, medical and community facilities within walking distance of the majority of the suburb. In addition, under previous consultation for the approach to growth under the FDS, a greater area of the highlighted examples were included as potential areas for higher-intensity housing. It is considered that the intensification areas should be expanded to include a greater area where the discussed aspects are present, being key transport links and easy access to everyday services and amenities.

Expanding the intensification areas to include areas such as the ones highlighted will ensure that when future plan changes occur to enable a greater level of development, that they are not pushed to the side and disregarded as areas where further growth could occur.

Hierarchy of growth areas

As shown by Figure 1, no distinction is made on the level of density that would be enabled in the intensification areas and a blanket term has been adopted. Further detail should be given on the level of density within the intensification areas, such as 'medium density residential' or 'high density residential' Examples of this were evident in previous consultation on the FDS, as shown by Figure 2 below.

Figure 2 - Density/Zoning distinctions

It is considered that this should be carried over to the proposed FDS and it should more clearly identify and define the level of density for the intensification areas as certain areas will be able to accommodate greater levels of intensity compared to other parts of the Gisborne urban area.

Of most importance to Iconiq is defining the intensity of future residential growth. The city centre and areas along arterial routes and within close proximity to local services and amenities should be identified as 'high density residential' and the remainder of the intensification areas should be defined as 'medium density residential' or similar terminology. This distinction is considered crucial in ensuring Gisborne's future growth does acknowledge the areas where higher density development can be supported and doesn't just apply a blanket approach to intensification across the identified areas within the urban Gisborne area.

Furthermore, the proposed FDS defining areas that are suited to 'Mixed-Use' or a more general 'Centre Intensification' would also further benefit the future growth of Gisborne and provide clearer guidance on how the central areas of Gisborne should grow and be developed. It is considered that this additional layer of detail will greatly benefit future plan changes that will enable the outlined growth to occur and will avoid areas being underutilised in the future.

The zoning of land is the fundamental mechanism within the District/Unitary Plan to identify the geographical areas of Gisborne which are best suited to providing for differing levels of change and growth over time. It is important to consider that zoning is not intended as an expression of an existing situation. Zoning should not simply consider the future use of land in the context of that land's existing use, or development form. Rather, it sets a pattern of land use to provide for the social, economic, cultural and environmental wellbeing of the community, both now but more importantly for future generations. 3

Where zoning and/or enabled development within zones places heavy emphasis on preservation of existing intensities of development in reference to historic development patterns, long term strategic objectives of new District Planning (in response to national direction such as that of the NPS-UD) can be compromised. This also fails to realise the opportunity cost of taking a short-medium rather than long-term approach to spatial planning (i.e., over a present District Planning cycle). Development opportunities for infill or comprehensive redevelopment can be compromised where the zoning and/or provisions do not enable or support such objectives.

Iconiq considers that it is therefore important to consider the application of zoning (and associated provisions), is not just to provide for the expected or anticipated realisation of change simply within the lifetime of the Plan itself (e.g., the next 10-15 years), but also the pattern of zoning applied across Gisborne over a longer-term horizon.

Short term vision

The proposed FDS acknowledges that there is a housing shortage in Gisborne, however, the proposed FDS does place a focus on development in the short to medium term being similar to existing patterns of development, as highlighted by the below from pg. 14 of the proposed FDS:

"It is likely that the scale of intensification in the short-to medium term will remain relatively modest with a lot of new houses being built in smaller-scale infill development at the rear of existing dwellings. Some more comprehensively designed schemes at heights of multiple storeys."

Through Iconiq's partnership with Kāinga Ora and their other developments in Gisborne, it is clear that a greater level of housing is needed now and retaining 'modest' development in the short-to-medium term will not resolve the housing shortage faced in Gisborne. Development in the short-to-medium term should not be focused towards small scale infill development and a limited amount of development at multiple stories, this should be acknowledged as being needed now.

Iconiq's experience and completed projects in Gisborne have shown that higher intensity developments are extremely successful and well-responded to by the tenants who occupy these homes. A recently completed development at 440 Palmerston Road highlights how medium density developments can achieve high-quality housing that is located in areas within close proximity to services and amenities, whilst still meeting the everyday needs of residents.

In addition, the recently approved 770 Gladstone Road development (9 terraced dwellings and 6 apartments) further shows that medium density housing is already being provided for now and a greater focus should be given to enabling a higher level of development in the short-to-medium term, not just the long term.

It is considered that the FDS could more clearly convey that one of the key ways to respond to Gisborne's housing shortage is to ensure a greater level of development capacity is enabled so positive housing intensification can occur in the short-to-medium term and that a shift away from traditional forms of housing will be needed.

Next steps

It is strongly recommended that the above comments be considered for inclusion in the FDS to ensure the opportunities enabled by more intensive housing are provided for. Iconiq has a strong desire to continue their work in Gisborne and continue to provide high-quality housing that greatly helps in addressing Gisborne's housing shortage.

Furthermore, it is noted that for a greater level of intensification to occur, future plan changes will be required to the Tairāwhiti Resource Management Plan (TRMP) and this is referenced throughout the proposed FDS. To our knowledge, no timeframes have been outlined for when these plan changes will occur, and it is requested that Iconiq is kept informed on when these plan changes will be undertaken by Council. Iconiq has a particular interest in ensuring these plan change not only enable the greater level of intensification outlined by the proposed FDS to occur but also addresses other key aspects that may hinder future residential development. One key aspect is notification requirements and clearly defining what type of developments would not be subject to notification.

65	Tony Horton. Waka Kotahi NZ Transport Agency				See below
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NZ Transport Agency / Waka Kotahi Feedback to the Draft Tairāwhiti Future Development Strategy

NZTA/Waka Kotahi welcomes the opportunity to provide feedback on the Draft Tairāwhiti Future Development Strategy (FDS). Waka Kotahi supports the FDS process as an important tool to integrate land use and infrastructure planning for Tairāwhiti.

Executive summary

This feedback relates to the outcomes sought by the following strategic transport and planning documents:

- Transport Outcomes Framework
- Government Policy Statement on Land Transport (GPS)
- Arataki
- Toitū Te Taiao
- Emissions Reduction Plan
- National Adaptation Plan
- National Policy Statement on Urban Development

In summary our submission identifies the following key points:

- Support for development of the FDS, acknowledging that it was not a requirement for Gisborne District Council
- General support for the objectives of the FDS.
- Strengthen the FDS and its implementation which a stronger focus on integration between land use and infrastructure interventions.
- More information should be provided on the transport assumptions needed to support future growth.
- Reference the transport investment process and ensure alignment with future Regional Land Transport Plans
- Greater clarity needed on the business and industrial land demand and capacity as well as the role of the centres within the District.
- Provide detail on the staging and sequencing of future development. Further justification for the large areas of greenfield development.
- Strengthen the consider of resilience, particularly in regards to future transport investment.

Strategic context

To provide context to our feedback, this section provides an overview of the key transport strategic planning drivers:

Transport Outcomes Framework / Te Anga Whakatakoto Hua mō ngā Waka

The Ministry of Transport (MoT) have developed a Transport Outcomes Framework. The purpose of the transport system is to improve people's wellbeing, and the liveability of places. It does this by contributing to five key outcomes, summarised in the diagram below.

All these outcomes are inter-related and need to be met as a whole to improve intergenerational wellbeing and the quality of life.

Government Policy Statement on Land Transport (GPS) / Te Tauāki Kaupapa Here a te Kāwanatanga mō ngā waka whenua

NZTA/Waka Kotahi must give effect to the strategic outcomes set by the Government through the Government Policy Statement on Land Transport (GPS). This sets out four strategic priorities, which are relevant to this plan:

Safety: Developing a transport system where no one is killed or seriously injured

Better Travel Options: Providing people with better transport options to access social and economic opportunities

Climate Change: Developing a low carbon transport system that supports emissions reductions, while improving safety and inclusive access

Improving freight connections: Improving freight connections for economic development

To deliver on the outcomes set by the GPS, NZTA/Waka Kotahi have developed several strategies. A summary below is provided of those strategies relevant to the Tairāwhiti Spatial Plan.

The GPS will be refreshed for 2024. A draft GPS 2024 have been released by The Ministry of Transport. This draft may change further through the new government.

Arataki

NZTA/Waka Kotahi's 30-year view on strategic changes and actions needed to deliver the long-term outcomes for the land transport system. It includes a national view as well as a regional view for Tairāwhiti – Gisborne, which includes the following focus areas:

Rebuild the network destroyed by Cyclone Gabrielle and improve resilience.

Enable and support the region's transition to a low-carbon economy.

Maintain and improve the resilience and efficiency of key connections to the west and south.

Improve access to social and economic opportunities, especially by public transport, walking, and cycling.

Begin to reduce vehicle kilometres travelled in a way that's equitable and improves people's quality of life.

Significantly reduce the harm caused by the region's transport system, especially through improved road safety and reduced pollutants dangerous to health.

Actively support, enable, and encourage growth and development in areas that already have good travel choices and shorter trip lengths.

Rapidly accelerate the delivery of walking and cycling networks, predominantly through reshaping existing streets, to make these options safe and attractive.

Explore new and emerging technologies, such as on-demand services, to improve access to social and economic opportunities.

Better understand the impact of future economic transformation on travel patterns and freight volumes.

Explore opportunities to move to a more multimodal freight system with greater use of rail and coastal shipping.

Confirm how key resilience risks will be addressed over time, and work with communities to identify plans for when to defend, accommodate, or retreat.

Continue to implement road safety plans and programmes including those focused on iwi Māori.

Reduce financial and other barriers to iwi Māori getting a driver's licence in areas not well served by public transport.

Improve or maintain, as appropriate, physical access to marae, papakāinga, wāhi tapu, and wāhi taonga.

Toitū Te Taiao

This is NZTA/Waka Kotahi sustainability action plan. This seeks to address the strategic challenge of reducing greenhouse gas emissions and improve public health. This strategy identifies an "Avoid Shift Improve" framework which includes:

- **Avoid:** reducing the need to travel and/or the time or distance travelled by car, while improving or maintaining accessibility,

- **Shift:** changing how we move; e.g. shifting from cars to lower-emission types of travel (e.g. public transport, cycling and walking,
- **Improve:** improving the emissions efficiency and the use of low-carbon fuels

Emissions Reduction Plan / Te hau mārohi ki anamata

The Emission Reduction Plan (ERP) was finalised May 2022. The ERP sets out wide ranging policies and targets to reduce greenhouse gas emissions. The plan calls for a 41% reduction in emissions from the transport sector by 2035 (from 2019 levels). The transport section of the ERP includes the following focus areas:

1. reduce reliance on cars and support people to walk, cycle and use public transport
2. rapidly adopt low-emissions vehicles
3. begin work now to decarbonise heavy transport and freight.

National Policy Statement on Urban Development

The National Policy Statement on Urban Development (NPS-UD) provides a framework which supports the strategic transport outcomes through the integration of land-use planning and infrastructure provision. Policy 1 (iii) is of particular relevance from a transport / land use integration perspective (highlighted bold for emphasis):

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

1. *have or enable a variety of homes that: a. meet the needs, in terms of type, price, and location, of different households; and b. enable Māori to express their cultural traditions and norms; and*
2. *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
3. **have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and**
4. *support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
5. *support reductions in greenhouse gas emissions; and are resilient to the likely current and future effects of climate change.*

National Adaptation Plan

This plan sets out New Zealand's long-term strategy for climate adaptation and sets out the Government's approach to adaptation. The first national adaptation plan contains Government-led strategies, policies and proposals that will help New Zealanders adapt to the changing climate and its effects to reduce the potential harm of climate change, as well as seize the opportunities that arise. The following goals underpin the adaptation strategy:

- reduce vulnerability to the impacts of climate change
- enhance adaptive capacity and consider climate change in decisions at all levels
- strengthen resilience.

The issues relating to adaptation to built environment and infrastructure should be a key element of an FDS.

NZTA Waka Kotahi Feedback

NZTA/Waka Kotahi feedback on the Gisborne Future Development Strategy is outlined below:

1. NZTA/Waka Kotahi acknowledges that Gisborne District Council was not required to produce a Future Development Strategy, but we strongly support that this has been developed on a voluntary basis. The FDS process is an effective tool to support the integration and alignment of land use planning and transport infrastructure and services.
2. NZTA Waka Kotahi supports the development of an up-to-date Housing and Business Land Demand and Capacity Assessment, which provides a robust understanding of future growth drivers in the District.
3. The proposed overarching objectives for the FDS are supported. However, they could be strengthened by a clearer acknowledgement that resilience is a significant issue for transport infrastructure and services.
4. To better understand the potential impacts on the transport system further information is required on the transport assumptions for each scenario. This information is important to enable that understanding of the nature of any transport investment required to enable growth. This also helps to ensure that the preferred scenario delivers growth that is

achievable and affordable from a transport perspective. Consideration should be given to the following:

- transport assumptions for each scenario
- infrastructure requirements for new growth
- affordability / deliverability of the required infrastructure

5. The scenarios could be improved by providing more information on the staging/sequencing of growth. This is important information to determine when and where infrastructure investment is required. From the information provided Waka Kotahi has assumed that urban development will be sequenced before large scale Greenfield development however the FDS should identify when each new growth area is intended for development.

6. Where State Highway transport improvements have been signalled, they will need to follow the business case process. This process should be identified as part of the implementation plan. To assist NZTA/Waka Kotahi to gain a complete picture of the integration of the FDS outcomes on the transport network any short to medium term improvements to either local roads or state highways should be entered into the Regional Land Transport Plan (RLTP). There are significant funding constraints for transport investment. No guarantees can be given at this time that improvement signalled in the FDS will secure necessary funding.

7. An area which could be strengthened is the relationship between the growth outlined and the FDS and the existing and future freight network. This should acknowledge the role of the port and the state highway network as key corridors for freight movement. In particular whether there are whether there is any potential conflict between future development including intensification and the role and function of the State Highway network for freight. The network operating plan for freight should be a key document to inform this analysis.

8. Linked to the point noted above the FDS could be strengthened with further detail around business and industrial gross including land demand for various sectors and how that demand will be achieved over the 30 years.

9. There appears to be a relatively large amount of greenfield growth areas identified in the FDS. It would be useful to understand the amount of development that each of these Greenfield areas are anticipated to deliver and how that relates to the housing demand established through the Gisborne HBA. Consideration should be given to the infrastructure costs and timing to enable development to occur in these Greenfield sites.

10. NZTA/Waka Kotahi acknowledges the significant resilience challenges for Gisborne and the work currently underway to address the impacts of recent severe weather events. Resilience is an important issue to consider not just for where growth goes but also the transport infrastructure that's needed to serve that growth. While the FDS does include outcomes relating to resilience, it could be strengthened with further discussion around ensuring that future communities are resilient to the impacts of severe weather events and climate change. Resilience/adaptation outcomes should be factored into the infrastructure the development infrastructure required to serve new growth.

Please note that this feedback does not predetermine any submission on any future plan changes or investment requests needed to implement the Future Development Strategy. This feedback expresses Waka Kotahi's current view based on the information available. If the FDS is put on hold for any length of time or new information is made available, then Waka Kotahi may need to review its comments in light of any change to traffic, safety, planning or policy considerations. NZTA/Waka Kotahi welcome the opportunity to continue to support Gisborne District Council in finalising the FDS and would be happy to discuss further any points raised in this feedback.

66	HUNAARA WAEREHU	Yes	Yes	Yes	See below
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Federated Farmers of New Zealand (**Federated Farmers**, or **FFNZ**) appreciates this opportunity to submit on the Draft Tairāwhiti Future Development Strategy 2024-2054 (Draft FDS).

1.2. We acknowledge other submissions from members of the farming community.

1.3. Federated Farmers would appreciate the opportunity to speak to its submission.

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1.4. Federated Farmers is conscious that there may be significant 'consultation fatigue' out in the community given then challenging regulatory and economic environment we are currently in. Our members do not want this silence to be misconstrued as disinterest in the Draft FDS.

1.5. Federated Farmers is an organisation that works with farmers involved in a range of rural businesses (dairy, dry stock, arable cropping, and horticulture) to ensure practical and workable outcomes in relation to the environment and regulation. Our members are interested in the sustainable and equitable development of Gisborne region. We believe a well-balanced Future Development Strategy is one that provides for the needs and concerns of the agriculture sector given the significant contribution that the agricultural sector delivers to the region's economy.

1.6. Federated Farmers participated in non-statutory consultation in February-April 2022, where we provided preliminary feedback to Gisborne District Council (Council) as to what strategic direction we would like to see in the Draft FDS. We continue to be interested in the Draft FDS to ensure that it:

- Protects highly productive soils for regional food security and the resilience of future generations as directed by NPS-HPL.
- Prevents further urban encroachment on, and fragmentation of, productive land.
- Protects farmland from reverse sensitivity effects of urban development to ensure routine work on farms can continue unimpeded.
- Ensures public infrastructure can cope with further urban development pressure.
- Recover costs of any new infrastructure fairly and equitably based on who uses and benefits from those services.
- Accommodates growth with higher density housing to create vibrant towns and lower carbon and physical footprints.

1.7. This submission will include general comments, comments on the Framework of Objectives, the Preferred Growth Strategy proposed by Council, the Intensification Approach, and the comments on infrastructure investment.

2. GENERAL COMMENTS

2.1. Given recent weather events, climate change, Covid-19 and a changing legislative context, Federated Farmers congratulates Council on producing a comprehensive Draft FDS for consultation.

2.2. Our members run businesses that rely on the availability of natural resources such as land and water. Urban development can compete with the availability of these resources which can impact the viability of rural businesses. Council can influence the extent of this impact by setting balanced strategies for urban development. These strategies will influence policies and rules which will direct planning decisions.

2.3. We understand that Council is a Tier 3 local authority, for the purposes of the National Policy Statement on Urban Development (NPS-UD) and is therefore not required to prepare a Future Development Strategy.¹ However, Federated Farmers supports Council in their decision to prepare a Future Development Strategy. We view this strategic document as an important tool to promote long-term strategic planning in relation to well-functioning urban environments and ensuring that there is sufficient development capacity to meet expected demand.

¹ National Policy Statement on Urban Development clause 3.12.

2.4. Generally, we support the Draft FDS which appears to strike the appropriate balance between intensification and new development near urban areas and ensuring that productive land is not inappropriately used. Federated Farmers supports the Framework of Objectives which includes an overarching objective and three focus areas: Te Taiao, He Tangata and Development. Federated Farmers also supports the Preferred Growth Strategy and the Intensification approach to Growth.

2.5. In our submission, we seek strategic direction to ensure that future planning decisions, rules and policies minimise the impact of reverse sensitivities on existing land use, particularly land used for agricultural purposes. We seek strategic direction to ensure that urban infrastructure investment is funded equitably, and that rural connectivity is improved.

3. THE FRAMEWORK OF OBJECTIVES

3.1. Federated Farmers supports the Framework of Objectives (the objectives). These objectives work together to provide a balanced approach to urban development which we agree is essential to achieve a well-functioning urban environment. The objectives also provide for interests that may be vulnerable to urban development.

3.2. Federated Farmers would like to see the productive capacity of both highly productive and non-highly productive land (productive land) protected so that agricultural can continue to operate unimpeded and contribute to the local economy.

3.3. It is good to see Council's efforts to ensure that growth does not occur on highly productive land. This is consistent with the objective of the National Policy Statement for Highly Productive Land (NPS-HPL), which seeks to ensure that highly productive land is protected for use in land-based primary production both now and into the future. It also recognises that sufficient growth capacity can be found elsewhere such as on non-productive or under-utilised land or through intensification of existing residential or commercial areas.

3.4. Federated Farmers would like to see the productive capacity of both highly productive land and productive land protected from the implications of urban development. Urban development can give rise to reverse sensitivity effects when located close to land used for agricultural purposes. It is important to ensure that existing land used for agricultural purposes can continue to operate to its full potential amidst urban development.

3.5. Minimising potential for reverse sensitivity effects when planning for growth is essential. Federated Farmers would like to see recognition that growth in or near rural areas may give rise to reverse sensitivity and that this needs to be minimised so that rural production can continue to develop.

3.6. Federated Farmers understands that growth may need to occur near agricultural land use. In these situations, Federated Farmers would expect to see Council communicating with landowners as to the implications of new development on their farm and that farmers are given the opportunity to come to an agreement to mitigate these implications.

Recommendation:

- Council adopts the Framework of Objectives.
- Council includes an additional objective in the Development objective which reads: "reverse sensitivity effects are minimised".

4. THE PREFERRED GROWTH STRATEGY 4.1. The preferred growth strategy is supported as it balances a mix of intensification and greenfield development mainly in and around existing urban environments. This strategy encompasses principles of sustainable development, efficient land use, housing diversity, and a compact approach to growth. The preferred growth strategy emphasises environmental stewardship collaborative planning through the Territorial Resource Management Plan (TRMP), and a balanced approach to urban and rural interests, all aimed at creating resilient communities capable of withstanding natural hazards and adapting to future challenges. These principles collectively form the basis for a forward thinking and inclusive development strategy.

Recommendation:

- Council adopts the preferred Growth Strategy.

5. THE INTENSIFICATION APPROACH

5.1. Federated Farmers supports the approach to growth which targets intensification in existing urban areas (76% of total growth), new greenfield development near urban areas (14% of total growth) and development of existing rural towns (10% of total growth).

5.2. Councils certainly have a role to play in encouraging the shift from standalone housing to more dense housing. An intensification approach to growth will inspire planning objectives and policies to embrace smart growth principles such as compact, mixed-use development, reducing urban sprawl, preserving open spaces and highly productive land. We encourage Council to continue with this approach and to do their part to remove any barriers to intensification.

5.3. Federated Farmers supports rural residential intensification provided reverse sensitivity effects are minimised. We support the development of rural towns to ensure they can provide local employment and housing for retirees and workers.

Recommendation:

- Council continues with its proposed intensification approach to urban development.

6. INFRASTRUCTURE 6.1. Intensification requires parallel investment in existing and/or new urban infrastructure to avoid environmental degradation and redress sprawling development. Federated Farmers supports investment to accommodate intensification. This investment should be financed equitably based on who uses and benefits from the infrastructure investment.

6.2. Federated Farmers supports the continued use and increase of development contributions. We support the use of a development contribution policy where the infrastructure costs of development are recovered by Council from those who are creating the need for that capital investment. This reduces burden on ratepayers and achieves intergenerational equity.

6.3. Federated Farmers would like to see Councils financial and infrastructure strategy take a user pays approach to urban intensification to achieve equity for rate payers.

Recommendations:

- Infrastructure investments should be financed using a 'user pays' approach to reduce burden on ratepayers and achieve intergenerational equity.
- Council considers such an approach when drafting their Long-Term Plan.

67	Carrie White Tairawhiti Adventure Trust	Yes	No	Yes	<p>Te Taiao me he Tangata makes sense Kaiti needs the type of public space infrastructure investment that intensification would facilitate. This includes continuous connecting footpaths to schools and sports fields, and increased capacity of the wastewater network.</p> <p>This infrastructure investment necessary for an intensification approach will hold us in good stead for future challenges.</p> <p>Thank you for the opportunity to make a submission to the FDS. We understand that "The overall purpose of an FDS is to set out how Council intends to achieve well-functioning urban environments over a 30-year timeframe..." and make the following comments in support of that.</p> <p>To be clear, our interest in the FDS is that it will be the guide to Council decisions about future financial and infrastructure planning - through its Long Term Plan, Asset Management Plan and Infrastructure Strategy. We are aware that</p>
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					<p>2024 is a LTP review year, and are keen to participate in that process through all available channels.</p> <p>About Us The Tairāwhiti Adventure Trust is a Charitable Trust, run 100% by volunteers. We throw our energies into brilliant initiatives that break barriers, challenge norms and reshape the future of our built environment. Our mission is to empower our young people of Tairāwhiti to reach their full potential through action. Our kaupapa stems from our belief that better is possible. The idea that our public places should be inclusionary to all abilities and socio economic status, beautiful, fun, inspiring and safe is one that resonates with us, and is something we encourage Council to also strive towards.</p> <p>2023 was a challenging year for everyone in our community. The impact on our communities of being hammered by consecutive severe weather events has been cumulative and profound.</p> <p>The type of critical assets we need in order to build back better from Cyclone Gabrielle and other weather events include: Continuous and connected footpaths between the places we want to go to (home-school - shops- skatepark) Streets that support slower vehicle movements. Off-road bike paths that connect. Processes that make it easier for community groups to inhabit and fully utilize public spaces and places, for example simplified policy and process for groups to repurpose underutilized or unused public buildings. Policies and actions that support public places being used by more people, for example building in three phase power outlets to spaces that are ideal for (and already are regularly used for) community events i.e. Grey Street near the iSite, Reads Quay, Heipipi Park, Marina Reserve -so that power is available without the noise of generators. More places and facilities for non-competitive active recreation, for example climbing walls, skating, bike riding. Seating and places to sit that make people feel comfortable to inhabit public spaces -just because it's nice to be outside, people watching, striking up random conversations. We encourage Council to consider these things in the context of the FDS, and in the context of its 2024 LTP planning. We acknowledge that the FDS has been framed to be translated into urban growth and development content in the new Tairāwhiti Resource Management Plan (TRMP), but the need for action in the immediate and short term - to create the conditions for a well-functioning urban environment, with happy, healthy, well connected people requires greater urgency than the TRMP timeline. We are heartened by the Councils recent Tairāwhiti Move initiative, and look forward to continuing to work alongside the Council to create better places for our young people - and our whole community.</p>
68	Paul Murphy	Yes	Yes	Yes	<p>I support the overarching Te Oranga o te Taiao objective supported by Te Taiao, He Tangata and Development. Particularly placing the importance of protecting the environment first</p> <p>I support the intensification option although it would be helpful to better understand the modified version, including providing additional growth opportunities in Western greenfield areas and removal of Wainui,</p>

					Awapuni and Rail Station growth areas I generally support the approach but it would be helpful to understand more about the modified western growth area as it seems at odds with the objective? What additional infrastructure may be required to support that growth area?
69	Carrie White Te Wharau School	Yes	No	Yes	<p>A focus on the Environment and people is an appropriate framework to support growth. Kaiti needs the type of public space infrastructure investment that intensification would facilitate. This includes continuous connecting footpaths to schools and sports fields, and increased capacity of the wastewater and stormwater network. This infrastructure investment necessary for an intensification approach will hold us in good stead for future challenges.</p> <p>Thank you for the opportunity to make a submission to the FDS. We understand that "The overall purpose of an FDS is to set out how Council intends to achieve well-functioning urban environments over a 30-year timeframe..." and make the following comments in support of that.</p> <p>As an inner suburban Primary School - located deep within an established residential area, (there are three schools - Te Wharau, Ilminster and Kaiti - all within a 2km residential catchment) we support the intensification approach because we see that manifesting as:</p> <ul style="list-style-type: none"> * On-the-ground improvements to the footpaths and pedestrian crossing arrangements around Kaiti. * Increasing the available supply and mix of houses in proximity to our school. * Creating an impetus to think about innovative 'activity centre' scale solutions to stormwater management, for example using our sports fields as stormwater retention basin - to alleviate inflow and inundation issues for the homes in surrounding streets- and to redevelop our dated playground and fields to a standard better suited to the high aspirations we hold for our tamariki. * Creating the conditions where Te Wharau School - and the adjacent Delatour Medical Centre can benefit from additional investment that would make it an well-equipped evacuation hub for the surrounding community, in times of emergency. <p>For us, our akonga and whanau - continuous, connecting footpaths, slower speeds during school hours and high visibility crossing on De Latour, Rutene and Grahame roads are priorities that we wish to see in the immediate to short term.</p> <p>So while we acknowledge that the FDS is structured to be translated into urban growth and development content in the new Tairāwhiti Resource Management Plan (TRMP) we hope that Council seriously considers fast forwarding budget and work programme decisions - as part of its process to prepare the Long Term Plan 2024 - that will create these conditions in Kaiti. In turn building a well-functioning urban environment.</p> <p>We encourage Council to consider these things in the context of the FDS, and in the context of its 2024 LTP planning, and look forward to continuing to work in partnership with the Council to create better places for our young people - and our whole community.</p>
70	Graeme Mc Carrison Spark NZ	Yes	Yes	Yes	<p>The FDS does not mention telecommunications infrastructure. Telecommunications is a critical infrastructure providing digital services essential to a well-functioning urban environment.</p> <p>Telecommunications infrastructure is nationally,</p>

					<p>regionally, and locally critical. It is fundamental to digital transformation of private and public (both social and network) infrastructure. Telecommunication networks, wireless and fixed line are a critical part of enabling New Zealand to successfully respond to climate change, monitor and enhance the environments that New Zealander's love. These networks enable the gathering and generation of data to better understand and respond to changes, especially environmental changes which are occurring at pace. Telecommunication network technology is continually developing and changing to meet customer expectations for new, faster, and uninterrupted digital experiences wherever possible they are. The continual challenge is finding locations to increase the density of the telecommunication networks to meet the demand generated by growth and development.</p> <p>While the industry can support which ever proposal, our preference is for the intensification options within Gisborne. We look forward to working with Council staff on developing the framework for inclusion and recognition of the role and importance of telecommunications.</p>
71	Amber Kairau Ministry of Education	n/a	n/a	n/a	<p>The Ministry commends GDC for voluntarily preparing an FDS to address how the council intends to manage growth over the next 30 years. The Ministry is interested in the timing, staging, quantum and type of residential growth being planned as this type of information assists us with planning across the network of schools. FDSs are a helpful way of providing information about the planned direction of growth in an area, and the associated infrastructure provision.</p>
72	Zane Sabour	Yes	Yes	Yes	<p>I think having adequate housing `(in other words having basic need met) is closely linked to people caring about the environment. I think we should simply allow intensification everywhere for the first time because the housing crisis is so serious. I think we can reconsider in 5 years.</p> <p>Take action sooner rather than later.</p> <p>Intensification is good generally I like the work that has been done.</p>
73	Yvonne Steegall				<p>(attended in person event, general support)</p>