

## **Spaces in Contention in the Western Bay of Plenty sub-region: Special Housing Areas and Public Consultation**



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Public Policy & Research Ltd

Building Better Homes Towns and Cities  
SRA 1 – The Architecture of Decision-making – Life as Lived  
Component

August 2018

## **Acknowledgements**

This research is funded through the Building Better Homes, Towns and Cities National Science Challenge: SRA -The Architecture of Decision-Making. Particular thanks are due to Professor Karen Witten (SHORE Centre Massey University), Dr Patrick Barrett (University of Waikato) and Dr Kay Saville-Smith (CRESA) for their review and comments.

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# Executive Summary

This report considers the public consultation associated with the establishment of Special Housing Areas (SHAs) in the Western Bay of Plenty sub-region, how it affected decision-making about SHA developments, and what it tells us about people's views of our homes, towns and cities.

Overall, 69 percent of the 603 submissions on SHA proposals were opposed, and the remainder were either supportive or neutral. Those opposed cited a range of perceived social and environmental impacts. By far the top concern was traffic impacts. The effects of densification and impacts on the living environment were also of concern. The large majority of issues covered in the submissions fell into three clusters:

- Traffic volume, congestion, road infrastructure, safety of road users and emergency evacuation routes.
- Dwelling density, housing quality, social problems and property devaluation.
- Loss of neighbourhood character, lifestyle and natural environment.

Over 13 percent of submissions explicitly objected to the SHA approach, because it is seen as unfairly overriding planning processes that allow public input. The efficacy of SHAs to free up land and deliver affordable housing, the purpose of SHAs, was also questioned.

Most of those who made submissions were residents near or adjacent to proposed SHA sites. The voices of those who equally have interests in living in suitable housing and residential environments, such as renters, those on low incomes, first-home buyers and retired people, were not apparent.

Although a majority of submissions were opposed, all proposed SHAs to date have been approved by the councils. The critiques and information gained from the consultations could open up opportunities to draw on local knowledge and stimulate wider community dialogue about the design of homes and residential developments.

Submissions showed that housing that provides privacy, access to sun, light, and views is valued. With regard to development design, submissions highlighted noise control, traffic management, adequate parking, landscaping and green spaces, the visual appearance of buildings, siting of homes in relation to neighbours and the provision of amenities and services alongside residential development.

Some submissions also suggest that, if councils place appropriate requirements on SHAs, they have the potential to deliver affordable housing, a variety of housing typologies to suit a diverse population and improved living environments with environmentally sustainable features, universal design and age friendly, walkable and connected neighbourhoods.

# 1 Introduction

This report is concerned with three questions. Firstly, the nature of public consultation that has occurred around the establishment of Special Housing Areas (SHAs) in the Western Bay of Plenty sub-region and secondly, whether that consultation has affected decision-making about SHA developments. More broadly, this report is also concerned with what the SHA consultations tell us about people's views about our homes, towns and cities. These are important questions because, despite the lack of requirements around public consultation for SHAs, the principles and practice of participation are embedded in New Zealand's planning processes. Consequently, people expect to be able to voice their opinions on, and affect, decision-making about residential developments.

New Zealand is experiencing intense pressures for residential development, not only for more housing but also for more affordable housing (New Zealand Productivity Commission 2012; Johnson, Howden-Chapman and Eaqub 2018). Much of this development pressure is exerted in greenfield sites, and particularly in coastal areas (Collins and Kearns 2010; Kearns and Collins 2012). In all, the 15 SHAs proposed for the Western Bay of Plenty sub-region are expected to contribute around 3,400 new dwellings. The large majority (93 percent) of those dwellings will be in greenfield sites. Most of the proposed SHAs are within a few kilometres of the coast, a particularly desirable residential and recreational environment. It is consequently no surprise that, all together, the SHA proposals elicited 603 written submissions to the two councils, over two-thirds in opposition to such development.

The themes of residential development pressure, public participation and public opposition come together in the establishment of SHAs. This is the second report on a case study examining the development of SHAs in the Western Bay of Plenty sub-region, which comprises the councils of Tauranga City and Western Bay of Plenty District. The case study is one component of the research programme of the Architecture of Decision-Making – that is, a series of case studies which we broadly call *Life as Lived*. These case studies look into policies, programmes and activities to better understand not only their outcomes, but more importantly, what they reveal about the complex systems that generated those outcomes. It matters that we understand the complex array of industries, sectors, actors and resource holders involved in making decisions, as the tools or logics they use can facilitate or hinder the development of housing and built environments that meet the needs of communities.

SHAs are a key mechanism for implementing the Housing Accords and Special Housing Areas Act 2013 (HASHAA), which was established to facilitate an increase in land and housing supply, and by doing so, it is intended to enhance housing affordability.<sup>1</sup> The first report on SHAs in the sub-region focused on the regulatory agencies that manage the supply of land and impacts of residential development. It looked at the legislation and councils' policies and decision-making processes for the establishment of SHAs (James 2017; James 2018). This report shifts the focus onto demand-side actors – householders. A significant component of

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<sup>1</sup> Clause 4, *Housing Accords and Special Housing Areas Act 2013*.

this report is devoted to examination of written submissions on SHA proposals. This body of material, which highlight residents' voices, provides a unique window on public views, both positive and negative, about SHAs. The submissions indicate what the interested public thinks about SHAs and their ability to address housing problems, their issues and impacts. The submissions also provide an opportunity to better understand residents' values and aspirations about housing and the built environment. This quantitative and content analysis of submissions makes a contribution to the few quantitative studies detailing issues raised in objections to residential development proposals, particularly those focused on affordable housing (Davison *et al.* 2016:390).

Of course, there is a question about how much influence householders can and do have, and whether their influence is only marginal and reactive. Landowners, property developers, council planners and planning consultancies are arguably those who really shape residential developments. Nevertheless, New Zealand's planning processes provide for those affected by and interested in a development to have a say on that development. While the HASHAA has been designed to speed up development, largely by reducing public consultation opportunities, this study offers observations about the public's exercise of 'voice' within reduced opportunities.

This report is structured as follows. Section 2 presents the key focus of the analysis and research method. Section 3 describes the SHA consultation processes that occurred in the sub-region, describing how consultations were carried out and who participated. Section 4 presents submitters' views on the adequacy of consultation in relation to the establishment of SHAs. Section 5 presents submitters' views on SHAs as a housing intervention. Section 6 presents a summary of the range of issues identified in written submissions. Section 7 examines whether the consultations have had any impact on decisions around SHAs. Section 8 makes some concluding observations about what we can learn from this case study about people's perceptions of SHAs, as well as their aspirations for their housing and the built environment.

## 2 Focus of Analysis and Research Method

This section has four components. It starts with comment on debates about the nature and merits of public participation in planning processes and notes key themes from the literature that guide this study's analysis. The second part outlines the place of consultation in decision-making about SHAs. The third part provides a brief description of the subjects of consultation, the SHAs. The types of residential development that the SHAs in the sub-region propose are outlined. Finally, the research method is described.

### 2.1 Public participation in planning processes

It has been widely argued in the literature on citizen participation that seeking the public's views on matters of policy, planning and implementation generates societal benefits. Participation is said to support the democratic legitimacy of governance and regulatory

institutions, increase the efficacy of regulation, improve the provision of public goods and services, and contribute to citizens' empowerment (Fung 2015; Turnhout *et al.* 2010; Lezaun and Soneryd 2006).

On the other hand, it has been argued that citizens' influence is limited, despite the appearance of consultative legislation and structures. The scope of consultation is confined and determined, not by the general public, but by the public agency, which sets the ground rules, defines the consultation process, controls the content of information and the time and spaces in which consultation occurs. Inevitably the control and ultimate decision-making power rests with the agency undertaking consultation (Turnhout *et al.* 2010; Lezaun and Soneryd 2006; Kesby 2007; Gunder and Mout 2002). A "simulated responsiveness" emerges, where the agency purports to be receptive, but avoids addressing issues raised in consultation (Lezaun and Soneryd 2006:24).

The research literature also considers how participation is shaped by social and spatial position. It is suggested that participants are generally better resourced and educated, as well as self-selected. Those with specific interests and stronger views tend to dominate, while others who are equally affected may be excluded (Fung 2006). The spatial aspects of participation are apparent in the characteristics of those who want to participate, who are seen as having a right to be involved and who actually participate (Kesby 2007). The substantive issues linked to the site, intertwined with place attachment and localised knowledge also frame the desire for engagement in consultation and what participants want to say (Collins and Kearns 2010).

These observations about the sometimes contradictory nature of citizen participation alert us to its diverse characteristics and effects. They suggest the possibility that participation can be examined as a "resource for human agency that facilitates reflection and social transformation" (Kesby 2007:2814), and through which spaces can be created for renegotiation and reinterpretation (Turnhout *et al.* 2010:26). This is the idea that consultation constructs a "technology of elicitation" (Lezaun and Soneryd 2006:24) that connects ideas and actors, thereby opening up conversations among different groups that contribute to knowledge and solutions. In this way we can reflect on how consultation can help improve decision-making on housing and residential developments. Consultation opens up a space to discuss a space. In this case, SHAs are the spaces in discussion.

SHAs are also spaces in contention. Of particular resonance for this case study is that SHAs potentially embody two development types that frequently attract debate: densification and affordable housing. Opposition to different housing types and potentially different residents introduced through such developments has been found to be most likely in socially homogenous, better-off areas of predominantly single-family and owner-occupied homes (Davison *et al.* 2016:388). Often, opposition is based on concerns about the appearance and maintenance of dwellings, the assumed characteristics and behaviours of incomers and impacts on property values (Davison *et al.* 2016; Saville-Smith and Saville-Smith 2018). Densification can also be perceived as resulting in a loss of environmental quality, residential character and lifestyle (Kyttä 2013). A growing body of New Zealand studies also suggest New

Zealanders' deep ambivalence towards medium density and apartments, and a cultural preference for stand-alone houses (Dixon and Dupuis 2003; Bryson and Allen 2017).

Sometimes opposition to residential development is categorised as NIMBYism (not in my backyard); that is; protectionist, self-interested and prejudiced against those perceived as different (McClymont and O'Hare 2008). The approach in this report is not to dismiss such responses as wrong or misguided, or to use NIMBY as an explanation for certain types of responses. Rather, the intention is to understand what that discourse reveals about the complexities of local concerns and interests (Bunningham 2000) about the SHAs in particular, as well as generally about residential development.

In summary, this case study is informed by the following themes in the research literature:

- Who participates in consultation and who is excluded.
- The nature of opposition and support for residential developments.
- The inherently localised and spatial aspects of participation and opposition, which reveal connections between people and places.
- The potential of consultation for creating knowledge and local solutions.
- The extent of impact that residents' voices have on public policy or action.

## 2.2 The place of consultation in decision-making about SHAs

At the local level the key decision-makers in the establishment of SHAs are councils. It is their role to assess applications for SHAs received from landowners or developers and they can choose to provide an opportunity for public consultation during the process of considering applications. If a council considers the SHA proposal to have merit, it recommends to the Minister of Housing that the SHA be established. The Minister of Housing then approves the SHA.

One of the aims of the SHA model is to speed up residential development by using streamlined processes with limited public involvement. The establishment of a SHA does not require public consultation. Furthermore, the resource consenting processes for residential development after a SHA is created do not require public notification of the proposed development and there is no legal appeal (Ministry of Business, Innovation and Employment 2013). Some limited provision for consultation is allowed under section 29(3) of the HASHAA, which states that a council may notify the owners of the land adjacent to the land subject to a resource consent application, the local authorities in whose area the land subject to the application falls, infrastructure providers, and if the land or land adjacent is subject to a designation, the relevant authority. This is not a mandatory requirement but a discretionary provision.

In contrast to minimal consultation requirements for SHAs, case law and other legislation set out principles and requirements of consultation with the public and with tangata whenua.<sup>2</sup> There are clear differences between the SHA approach and the Resource Management Act (RMA) approach. The RMA includes consultation as a standard component in the development of regional and district plans, which set the frameworks for land and resource use, as well as in consents processes for residential developments. While consultation is not a statutory obligation, the RMA carries a duty for the developer to consult those who may be affected by, or interested in, a proposal. Those parties can include neighbours, land owners and occupiers in the vicinity, users of a shared resource, community organisations, statutory, infrastructure and utility organisations and tangata whenua. A council can require the developer to consult with certain parties that the council deems to be potentially adversely affected (Ministry for the Environment 2015).

As well as public consultation duties under the RMA, councils are required under the Local Government Act 2002 to ensure that individuals, particularly those affected or interested, have information about proposals and decisions, the opportunity to engage with their councils and to make their views known. Councils must give people “reasonable opportunity” to present their views, and should treat these views, “with an open mind and give them due consideration when making a decision”.<sup>3</sup> These principles make fundamental distinctions between consultation and information provision. Consultation involves the provision of time for people to make a considered response as well as the provision of relevant and adequate information to enable people to respond. The decision-maker is assumed to be willing to change their mind based on a weighing up of the range of views and information received. This is in contrast to a process that merely communicates information to the public about a completed or proposed action.

As noted above, there are very narrow provisions for consultation in the HASHAA, focusing on certain stated affected parties. Despite these provisions, both councils in this case study have chosen to consult with affected parties and have also allowed the wider public to express their views about the creation of SHAs. Seeking the views of the public about the establishment of SHAs is not common among the 15 councils that are able to establish SHAs under Schedule 1 of the HASHAA. Apart from Tauranga and Western Bay of Plenty councils, it appears that only three other councils have a stated policy to seek public feedback on a SHA application.

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<sup>2</sup> See the Local Government Act 2002, section 78, Community views in relation to decisions; section 82, Principles of consultation. See also [http://www.localcouncils.govt.nz/lcip.nsf/wpg\\_url/About-Local-Government-Local-Government-In-New-Zealand-How-councils-should-make-decisions](http://www.localcouncils.govt.nz/lcip.nsf/wpg_url/About-Local-Government-Local-Government-In-New-Zealand-How-councils-should-make-decisions) For case law specifically in relation to consultation with tangata whenua, see <http://www.mfe.govt.nz/publications/rma/guidelines-consulting-tangata-whenua-under-rma-update-case-law/5-how-consultation>

<sup>3</sup> Local Government Act 2002, section 82 (1) (d) and (e).

## 2.3 Description of the SHAs

In Tauranga, 14 SHAs were established between 2015 and 2017. The only SHA in the Western Bay of Plenty District, Omokoroa, was established in 2015. Figure 1 presents the locations of SHAs established in the sub-region, shown as red dots.



*Figure 1: Special Housing Areas, Western Bay of Plenty sub-region*

The SHAs vary widely in their size, number of houses proposed, housing typology, location, zoning and other characteristics (James 2017:8-10). The sites range in size from less than one hectare to 35 hectares net for housing and are mainly located on greenfields sites. The proposed number of dwellings per site ranges from 31 to over 600. Most of the SHA land is in private ownership, although two sites consist of land owned all or in part by the councils. Tauranga City Council owns the land of one SHA, Smiths Farm. The Omokoroa SHA includes 10 titles, 6 of which are owned by Western Bay of Plenty District Council.

Notably, housing affordability is not a focus of the SHAs. No house price affordability criteria are included in the SHA establishment process, although the Omokoroa SHA is subject to an internal council policy setting out affordability requirements.<sup>4</sup> Only one SHA proposal, Ngā Potiki in Papamoa East, has a stated focus on affordable and social housing, including rental housing. Some of the housing types proposed within different SHAs, such as duplexes, terrace housing, town houses and apartments, may offer affordable housing. Other SHA developments appear not to focus on the lower end of the market, given their intention to build stand-alone houses, the proposed price ranges for sections and dwelling and section packages at the market median or higher, the proposed use of private covenants as a 'quality'

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<sup>4</sup> These affordability requirements are contained in Western Bay of Plenty District Council Minute C216.14 15 Dec 2016 Re-establishment of Omokoroa Special Housing Area.

indicator, and the stated targeting of “second home buyers”, “professionals”, “builders” and a “cross section” (James 2017:14).

## 2.4 Research method

Research focused on two aspects of SHA consultations: the consultation processes conducted by the two councils, and public responses elicited through submissions.

Analysis of the consultation process concentrated on the following:

- the rationale for consultation;
- how people were informed about the SHA proposals;
- how people were able to provide feedback to the councils about the proposals;
- who was invited to participate; and
- the numbers and characteristics of those who provided written submissions.

Analysis of published and unpublished material was conducted, with over 30 documents examined including:

- Tauranga Housing Accord and Western Bay of Plenty Housing Accord.
- Tauranga City Council and Western Bay of Plenty District Council consultation documents and related website pages, which were provided for the public to inform them about the characteristics of each SHA.
- Tauranga City Council Lead Policy: Housing Accords and Special Housing Areas Act 2013 Implementation Guidelines.
- Tauranga City Council and Western Bay of Plenty District Council briefing papers, which assessed the application for each SHA and made a recommendation to council whether the application should be approved. Included in those papers were summaries of consultation undertaken, issued raised through consultation and officers’ responses to those issues.
- Local media articles on the establishment of SHAs and associated consultation.

The second area of focus was the 603 written submissions received in response to the councils’ requests for public feedback on the creation of 15 SHAs. Submissions received through that process are publically available on the councils’ websites. Analysis of those submissions has sought to acknowledge the value of submitters’ voices by showing how the submissions demonstrate experiences, values and aspirations around housing and residential environments.

The submission is the unit of analysis, not the number of people represented by each submission. A thematic analysis was conducted on the issues presented in submissions. This analysis identified:

- The number of issues raised across all SHAs.
- The number of issues specific to each SHA.
- The range and prevalence of issues across all SHAs and specific to each SHA.
- Any issues identified in relation to a particular SHA, and contextualising the issue in relation to that SHA.

- Issues that are common across SHAs.
- The scope and focus of each issue.
- Clustering of issues, i.e. issues that express similar or related themes.
- Whether there are any differences in issues raised in relation to greenfields and brownfields SHAs.
- The extent to which submissions consider housing affordability, and how affordability is conceptualised in the submissions.
- The extent to which submissions consider liveability (including accessibility, comfort and sustainable resource use).
- The extent to which submissions consider the housing needs of different groups, such as first home buyers, renters or older people.

A coding frame for analysing the submissions was developed after a close reading of approximately 100 submissions selected from all SHA consultation processes. Those submissions yielded a variety of issues which were then used to examine and code all 603 submissions. If new issues were identified in subsequent submissions, those issues were added to the coding frame, which finally comprised almost 50 different issues. After coding was done, some issues were combined into closely related sets of issues for analysis. In all, three major clusters of issues were analysed. These are discussed in section 6 below.

### 3 SHA Consultations in the Sub-region

Nine consultations were conducted for the proposed SHAs. Tauranga City Council conducted six individual consultations for six SHAs. In addition, one consultation was conducted for six SHA proposals in Papamoa East. Another consultation was conducted for two SHA extensions, also in Papamoa East. Western Bay of Plenty District Council conducted one consultation for the Omokoroa SHA proposal. The consultations and numbers of submissions received are set out in Table 1.

SHA Proposal Consultation	Submissions
Smith's Farm	216
Six SHAs in Papamoa East – Palm Springs, Ngā Potiki, Papamoa Junction, Zariba, Golden Sands, Te Okuroa Drive/Parton Road.	152
Palm Springs Extension <sup>a</sup> & Golden Sands Southern Extension <sup>b</sup>	27 <sup>a</sup> 35 <sup>b</sup>
Chadwick Road	43
Girven Road	42
Adler Drive	42
Domain Road	20
Omokoroa	16
Waihi Road	10
<b>Total Submissions</b>	<b>603</b>

*Table 1: Number of Submissions by Consultations on SHA Proposals*

In total 603 submissions were received. Submission numbers ranged from 10 submissions to the Waihi Road SHA proposal, a site within a suburban area that was formerly a camping ground, to 216 submissions to the Smiths Farm SHA proposal, sited on rural land owned by the Tauranga City Council and zoned for rural residential development.

Across the consultations few multiple copies of submissions were received. The one exception was a submission with 44 signatures, however many of those who signed also made their own submission.

The approaches of the two councils to consultation are similar in that they included both targeted invitations to those who would be considered directly affected by the proposal such as adjacent land owners and residents (owner-occupiers and tenants), central and local government agencies and utilities, as well as open solicitation of responses from the general public. Also targeted were stakeholders representing community interests such as community boards and SmartGrowth forums, as well as Iwi organisations. Participants were able to submit their views in a variety of ways including at public meetings, through an interactive website and through written submissions. Details of each council's approach are described below.

### 3.1 Tauranga City Council

Tauranga City Council states in its Lead Policy that it will only recommend the establishment of a SHA to the Minister of Housing, "Where appropriate consultation has been undertaken including with any property owner directly affected, any directly adjoining landowners, tangata whenua when the area is within a rohe of a hapū which has a protocol with the Council, and relevant service providers" (Tauranga City Council 2014a).

The Council stated its rationale for consulting was based on legal advice. It applied its consultation and decision-making obligations under the Local Government Act in the SHA establishment process.<sup>5</sup> As a consequence, the Council undertook what it considered "reasonably extensive consultation with local communities to ensure legislative obligations are met and risks of judicial review are minimised." (Tauranga City Council 2015a:36-37). In particular, the Council was concerned to work through issues related to any proposed SHA on council-owned land, and which involved long-standing expectations in the community about the use of that land or statutory requirements under other legislation such as the Reserves Act. It is notable that the SHA proposal attracting the most submissions, 216, is also the only Tauranga SHA where the land is owned by the Council.

The Council has set out a staged process for considering SHA applications, specifying the point at which consultation will occur, and who will be consulted. Stage 1 involves identification of a possible site for a SHA by either a landowner/developer or the Council. At this stage the Council conducts an initial site investigation to establish its suitability for a SHA. If this initial

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<sup>5</sup> Section 82 of the Local Government Act 2002 sets out principles and information requirements related to consultation. Section 83 sets out the use of a special consultative procedure for a proposal.

examination is positive, a detailed site assessment is conducted at Stage 2. If the site merits further consideration, then consultation occurs at stage 3. Those consulted are affected land owners, iwi and hapū who have a consultation protocol with the Council and relevant service providers (Tauranga City Council 2014a).

The Council's general practice was to send a consultation document for the proposed SHA to affected land owners and surrounding residents, and to make the document available on its website. Each consultation document describes the Tauranga Housing Accord and the key elements of the SHA proposal, such as:

- the expected number, type and height of dwellings;
- possible selling prices;
- zoning matters;
- council's infrastructure assessment;
- a location map;
- a link to the developer/land owner's detailed proposal; and
- the options available to the council in respect of the proposal.

In addition to contacting those parties considered to be directly affected, the Council also held public open days where staff were available to answer questions about the proposal. Iwi views were sought through the tangata whenua collective,<sup>6</sup> which receives information on each proposed SHA, and through direct contact with iwi or hapū who have interests in the proposed site.

## 3.2 Western Bay of Plenty District Council

The Council has included consultation in its criteria for assessing SHA applications. Those criteria include that the views of iwi, land owners and the Omokoroa Community Board be sought (Western Bay of Plenty District Council 2014). The SHA proposal was considered to be of low significance in terms of Council's significance policy, and therefore did not trigger a process under the Local Government Act to determine the level of engagement required with the public (Western Bay of Plenty District Council 2014).

Information was provided to the public about the Omokoroa SHA proposal on the Council's website and in the local community newspaper, the *Omokoroa Omelette*. The following details were covered in the newspaper item:

- Reference to the relevant legislation and the ability to use faster and more permissive planning and consenting processes.
- The proposed site and map.
- The reason why Omokoroa is proposed, as it is one of the District's growth areas.

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<sup>6</sup> An autonomous body comprising representatives of iwi and hapū in Tauranga Moana. it provides a discussion forum for the Tauranga City Council, see <https://www.tauranga.govt.nz/community/tangata-whenua/tangata-whenua-committees-and-groups/tangata-whenua-collective>

- Expected benefits of the SHA including broadening of the rate payer base, recouping of infrastructure costs and opportunity to sell some of the Council's land assets.
- Clarification that 'affordable housing' in the Omokoroa proposal does not mean low cost or social housing, but instead housing that is accessible to a wider range of buyers.
- Intent to apply medium density provisions existing in the District Plan to the SHA development (Omokoroa Omelette 2014).

The Council conducted a consultation process that involved sending letters with information about the proposed SHA to directly affected land owners inside and adjoining the site, meetings with land owners, community meetings, discussions with key developers operating in the area, one-to-one meetings as requested and an interactive council website on which the public could post questions and have them answered by staff. The website attracted 20 comments. The council also received written comments from individuals, developers, and a community housing trust (Western Bay of Plenty District Council 2014).

### 3.3 Who participated

The issue of consultation and whose voices are heard in the consultation process has long been the focus of research and political debate. Developers have typically seen consultation as an unnecessary cost, providing a platform for NIMBYism and barrier to innovation (Davison *et al.* 2016; Rowley and Phibbs 2012). There is evidence that planning processes, including public consultation, tend to foreground the anxieties, aspirations and interests of those with experience in the planning system, have professional or other financial interests in outcomes, and those most able to invest in or mobilise legal or technical advice, access evidence, and the skills to prepare submissions (Fung 2006; Fung 2015). In this context the voices heard were also influenced by councils' invitations to make submission. Consequently, while those making submissions on the various SHA proposals were self-selected, both councils only sought submissions from those deemed to be directly affected by the developments. The majority of those who made written submissions to proposed SHAs were residents near or adjacent to the sites. These appeared to be mostly owner-occupiers, rather than renters. Most submissions were from one or two people, or a family group.

Also making submissions were institutional and private sector stakeholders, including developers, the Ministry of Education, the Public Health Unit of the Bay of Plenty District Health Board, the Bay of Plenty Regional Council, the Salvation Army, the Tauranga Community Housing Trust and infrastructure providers. The SmartGrowth Implementation Committee and SmartGrowth Social Sector Forum, representing wider community and institutional interests in the sub-region, made submissions to at least one SHA proposal.

## 4 Views about the Consultation Process

The consultation process itself was the second most common issue raised across SHAs, and it was raised in relation to almost all SHA proposals. In all, 156 submissions (26 percent of all submissions) expressed anger, frustration and disappointment with the way consultation was conducted. Objections to the consultation process were present regardless of whether or not a submission specifically stated an objection to SHAs in principle, or objected to a specific SHA. It may be that perceptions that the process was unfair actually escalated opposition, a phenomenon found in other studies (Davison *et al.* 2016:396).

A key objection to SHAs rested on the argument that a duty to consult was set aside. There was a widespread feeling that consultation is an important principle to uphold, regardless of the lack of requirement on councils to conduct consultation about SHAs, as this submission noted:

*... if the council chooses to process resource consents under the HASHAA rather than the Resource Management Act 1991, consultation may be limited to an initial feedback process such as the one being currently undertaken for Smiths Farm. Therefore this feedback process is particularly important (Smiths Farm).<sup>7</sup>*

Criticisms about the process itself revolved around a lack of time to express views, inadequate information and what was perceived as the council's failure to engage in good faith. These comments were typical of those who felt there was little time to prepare a considered response:

*We only received a letter 4 days ago & feel we are being railroaded (6 Papamoa SHAs).*

*The time frame windows given have been unacceptable and I for one, feel rushed and pressured to get this submission in (Smiths Farm).*

Submitters criticised what they considered to be insufficient, inaccurate and misleading information, particularly about complex technical matters, options, impacts, costs and benefits. A variety of submissions elaborated on this point:

*I think it is important that where TCC seeks feedback, that council also provides some commentary on the likely issues and on the validity of the information supplied by the applicants, rather than simply being a conduit for the developer's submission, and leaving it up to the public to review what are quite technical and complex documents (Girven Rd).*

*From the plans / sketched, it is impossible to gauge how the environment will be with regard to roads, space conjection [sic] etc. Is there a urban plan for view? ... what are the proposals for ensuring traffic and pedestrian safety? (Domain Road).*

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<sup>7</sup> Quotes from submissions are identified by the name of the particular SHA consultation to which they refer.

*Engagement means the free flow of information...information has had to be constantly and proactively dragged out of the [council] (Smiths Farm).*

*The council's decision is a big change in a small community, and so an evaluation of benefits and costs covering the social, cultural, environmental and economic aspects of the decision, rather than simply focusing on the benefits and costs to the Council itself would seem appropriate (Omokoroa).*

Some submitters did not think that that the process was a genuine attempt to hear and take into account residents' views. Submitters criticised the process as a "formality", "rushed", "pointless", "dictatorial", "disempowering", "immoral", "juggernaut" and a "fait accompli", among many disparaging comments. These comments show considerable frustration with the process:

*I want to know if 'have your say' really matters to you (6 Papamoa SHAs).*

*Judging by all the paperwork, planning and assessments that are already evident in your detailed correspondence, you are going to go ahead anyway, despite residents protests ... it seems quite immoral to me that the council assumes they can walk all over their residents ... All of this manipulation, fast tracking, not sticking to past agreements etc., then giving residents the opportunity to formally make submissions seems like an attempt to look like a democratic procedure but really hiding a dictatorial way of operating, especially with the conflict of interest issue (Smiths Farm).*

*I've had my say and don't see the point in coming to open discussions...last time I went to one I met several councillors who answered my queries with 'I'm not sure...I can't tell you the answer because I don't know' I believe the offering is just to tick the box (Palm Springs and Golden Sands extensions).*

While submitters were vocal about their own perceived exclusion from having any influence on council decision-making, a small number of submissions also spoke to the needs of those vulnerable in the housing market. Such comments were evident in the submissions of two community housing providers and a few individual submitters. For example:

*Would the Developer consider providing housing more suited to the local community's needs? The typical Papamoa demographic are young families or retirees, not apartment dwellers (individual submission, Domain Road).*

*Currently the community does not have these rental housing choices (community housing provider submission, Omokoroa).*

An overriding theme in criticism of the consultation process was that the public has an innate right to be consulted and to be listened to. Often underlying such views was a concern not to be seen as simply against development in their area. Submitters wanted to emphasise that they were not just self-interested but concerned about the impacts of the proposal on the

wider community. These comments frame objections in the context of community threat, benefit or wellbeing:

*It is important that communities are mixed and diverse and not divided by definition of economic status. Our district/city plans should reflect the ideal of diversity and the well being of all people in a community (6 Papamoa SHAs).*

*I understand that every city is growing and housing supply is problematic, I do not want to be seen to be against change. I do however consider that the effects of the development will be felt by those of us living near (Waihi Road).*

*The Omokoroa community is a functional community, actively interested in its future ... it would be easy to present this issue as one of property values and ignore the concern of many residents that adding a large area of dense housing ... has the potential to change the character of the community (Omokoroa).*

Despite the expressed frustrations with the consultation process, there is also evidence of a willingness to engage with ideas about residential development:

*If the council would like to discuss any local issues with the input of a positive outlook, long term local that understands the area, I am available at short notice & would be pleased to be of any assistance (Chadwick Road).*

*Rather than an ad hoc piecemeal approach I would much rather that council and community work together to develop proposals and a framework for looking at how the whole area may be developed (Girven Road).*

## 5 Views on SHAs as a Housing Intervention

In their report to the Tauranga City Council, officials commented on the general tone of submissions to the first consultation, which concerned the six SHAs proposed in Papamoa East. They observed that:

*“Community consultation has generated a great deal of local interest and feedback, with many not happy with the general idea, or worried about traffic and type of housing matters. There is a negative perception of the special housing areas concept.”*  
(Tauranga City Council 2014b).

This observation highlights that, in addition to commenting on substantive issues, submitters were critical of the SHA approach. In the consultations 82 submissions across 10 SHAs (13.5 percent of submissions) explicitly objected to the SHA approach. All of those submissions also made objections to substantive aspects of the proposed SHA development in their area. This section firstly focuses on objections to the SHA concept, and why submitters did not support that approach to residential development. Then the minority of submissions that supported the SHA concept are discussed.

## 5.1 Critiques of the SHA concept

Most objections to the SHA concept elaborated why they were opposed. Their comments revolved around three points:

- Use of the SHA process for residential development rather than the usual RMA process, including overriding the RMA requirements for public consultation.
- Scepticism that the purpose of SHAs, i.e., increasing the supply of housing and increasing housing affordability, would be achieved.
- The unintended outcomes of SHAs for future residential developments.

As noted in Section 4, a common view was that the public should be consulted about residential development. Submissions contended that consultation not only could, but should occur through existing RMA planning processes, rather than through the HASHAA. Importantly, the RMA process is seen to allow input from the community at various stages of decision-making. Not only does the RMA process allow for consultation when a development is proposed, but consideration of new developments must reflect district plan objectives, policies and rules, which have been set through years of consultation with the community in a more extensive process than that afforded by the SHA approach. This comment particularly illustrates submitters' concerns about the loss of public participation opportunities and subsuming of existing plans that have been established with the community's involvement:

*I don't believe that using the provisions of the SHA to bypass the already agreed City Plan is good practice. A huge amount of time, effort and community involvement went into developing the Plan - this shouldn't be ignored for such small gains in housing supply ... The SHA legislation specifically and significantly reduces the ability of the community and affected parties to make submissions on a proposal - in this instance I think that the effects of such ad hoc development within this residential zone need much greater scrutiny ... The use of SHA's takes away much of the ability for the community and affected parties to have any input (Girven Road).*

Lack of due process and fairness were also highlighted in some submissions:

*SHA being used as a vehicle to subvert community concerns that would be recognised under the RMA (Smiths Farm).*

*[the Housing Accord] results in reduced judicial rights and fairness, separating the existing community from decisions that affect them. There is also no right of appeal which greatly compromises the people's rights. Wrong and rushed decision making like this will result in poor outcomes for the people that already live in the area. Using a process like this which restricts people's ability to have their concerns addressed, on such a high impact proposal, with unproven justification and demand is wrong (6 Papamoa SHAs).*

Submissions also stated a preference for the changes to zoning and building height and density introduced for SHA developments to instead be achieved through existing RMA processes:

*The person selling the land is using the special housing accord to evoke a change to the zoning – is this the intention of the Special Housing Accord, and is this fair to the residents who have invested in the area? (Adler Drive).*

*Given that the central thrust of the proposal is to develop high density living in the midst of the lowest density residential zoning, the proposal is really an attempt to re-zone this land under the City Plan. The RMA sets out specific requirements for undertaking a private plan change (Girven Road).*

Overall, submissions saw the SHA process as an ad hoc approach to planning without the safeguards of the RMA, and as such inferior to the usual planning processes:

*SHA seem to be a dollar-driven way to circumvent RMA which was put in place for good reason (Smiths Farm).*

*I am not satisfied that this legislation is leading to good outcomes for New Zealand at large. It seems to be very rushed and does not appear well researched or thought out (Smiths Farm).*

Other submissions questioned a key assumption of the SHA approach, that it is the existing regulatory and planning systems that hamper the provision of land for housing. Thirty-three submissions across nine SHAs disputed whether there is a land supply problem, asking why SHAs are needed in the Western Bay sub-region where there appears to be sufficient land available and planned for residential development. This view is consistent with Tauranga City Council investigations showing potential land supply for residential development for the next 23 years (James 2017:12).

Submissions were also sceptical about whether SHAs would result in more affordable housing. Thirty-two submissions across 12 SHAs raised points about affordability. They queried the councils' lack of specific affordable housing requirements for SHAs, fearing that market prices would dominate and consequently lock out those the legislation aims to help. Some were concerned that incomers would push up housing prices in the SHAs, while others suggested that the lack of planning for facilities and services in conjunction with SHAs would also make the housing unaffordable, because residents would need to travel to access services. These comments illustrate concerns about achieving housing affordability through SHAs:

*[the submitter] considers that the Special Housing Area legislation makes a minor contribution to addressing New Zealand's housing affordability problems, we urge Councils to make every effort to utilise the legislation to ensure affordable housing options are available for individuals and families in the community ... [the submitter] believes that for a particular residential development to be classified as a qualifying development and therefore given all the commercial advantages that such*

*classification offers there should be some demonstrated link back to the expressed intent of the legislation that being housing affordability (Girven Road).*

*Affordable Housing needs to take into consideration the whole of life and cost of living of the occupants. This includes transport, schooling, recreation, services, employment etc. ... Because of it's [sic] relatively isolated location and high rates Omokoroa doesn't fit the criteria ... I am not opposed to affordable housing but recognise it requires careful planning of 'whole of life' facilities to avoid some of the negatives associated with and even forced on low income families (Omokoroa).*

Some submissions did not support the SHA process because they believed there would be unintended outcomes for future residential development that could not be controlled. While those outcomes were not always specified, 39 submissions in relation to three SHAs commented on possible precedent effects of SHA designation on adjacent land zoning and on other residential development proposals. For instance:

*If this scheme provides a valid basis for a special housing area simply because it thumbs its nose at the 325m<sup>2</sup> minimum residential site requirement, the 9 metre height limit, and other controls in the District Plan, then it would be difficult to think of any other intensification proposal that would not also qualify (Girven Road).*

*Does this mean the surrounding area could become sub-dividable? (Smiths Farm).*

Submitters' comments show that there is considerable unease about the SHA approach. Sometimes the need for SHAs at all is questioned. In other instances the efficacy of the SHA model in addressing land supply and housing affordability is questioned. Thirdly, submitters are concerned about SHAs setting a precedent that could undermine the local planning framework. Across the comments runs an abiding concern with fairness and the public's right to have their say on matters affecting their community. There is a sense of injustice that the SHA process has overridden the local planning framework.

## 5.2 Support for SHAs

Overall, 20 percent of submissions were fully or partially in support of a particular SHA proposal. This was not necessarily expressed as support for the SHA approach in general, although some submitters supported a key purpose of SHAs, improving the supply of affordable housing. Those supporters linked affordable housing with providing housing for consumers under-served by the market, such as older people and others wanting smaller homes, first home buyers and renters. Some suggested that purchase conditions should require affordable housing to be retained for a period of time. These comments express support for SHAs as a mechanism to deliver affordable housing:

*I believe this development will be great, especially for first home buyers and low income families (6 Papamoa SHAs).*

*I work with people who are desperate to find housing. Lets [sic] have more of this type of thinking (Chadwick Road).*

*[the submitter] wishes to reinforce that our growing sub region has the greatest need for secure, good quality long term rentals (Omokoroa).*

A smaller group of submissions expected positive effects from SHA developments through increased housing density and community revitalisation. They saw the SHA as a driver for improving the local area, by regenerating brownfields sites, creating more services and facilities for existing residents and increasing use of local businesses. All those aspects were considered to have a beneficial effect on property values. These comments were typical:

*I support the special housing area and I support the increase in density because I believe allowing a greater density of housing will support a more walkable community with greater services nearby. I care for a person with a disability, so having more people close to where we live...will mean that he will have more access to a wider variety of services...If possible I support even further increases in density in the local plan (Palm Springs and Golden Sands extensions).*

*The development being considered...looks very nice and will certainly tidy up the corner (Domain Road).*

A few submitters saw SHAs as opportunities for implementing sustainable and lifetime design housing:

*It is an excellent idea to build multilevel dwellings in the Special Housing Area to prevent urban sprawl and spilling out into the country areas. It makes sense as long as thought & planning and money goes into creating sustainable, warm, sound proofed, efficient in energy houses (Chadwick Road).*

*... encourage building companies to build homes that meet LifeMark housing standards (Chadwick Road).*

Overall, where support for SHAs was expressed, it was because of a perception that SHAs could provide for more affordable housing, and through careful design of homes and neighbourhoods, facilitate the development of more liveable communities.

## 6 A Summary of Issues and Themes Raised in Written Submissions

This section reports on the number, frequency and range of issues, both for each SHA and across SHAs. Summaries of the issues are presented in tables in Annex 1. Throughout this discussion, there is an attempt to strike a balance between summarising issues across SHAs and highlighting site-specific issues.

A thematic analysis of issues that arose across SHAs is also reported. Three clusters of issues are focused on. These clusters comprise the large majority of issues covered in the submissions:

- Traffic volume, congestion, road infrastructure, safety of road users and emergency evacuation routes.
- Dwelling density, housing quality, social problems and, as a consequence, property devaluation.
- Loss of neighbourhood character, lifestyle and natural environment.

## 6.1 Frequency data on issues raised in submissions

Table A.1 in Annex 1 sets out for each SHA consultation:

- The number of submissions received.
- The number of submissions opposed, in support (including partial support), and neutral (i.e. not stating either opposition or support).
- The issues raised and number of submissions raising each issue.

The majority of submissions are opposed to the establishment of SHAs. The overall number of negative submissions was 416 of 603 submissions (69 percent). The rest were divided between support or partial support (20 percent), and neutral (11 percent). The number of opposed submissions varied across the SHAs, from 31 percent opposed to the Omokoroa SHA (5 of 16 submissions), to 95 percent opposed to the Adler Drive SHA (40 of 42 submissions).

The two largest groups of submissions were in relation to the proposed SHA on Smiths Farm and the establishment of the first six SHAs in Papamoa East. A considerable majority of submitters were opposed. In all, 82 percent (125 of 152 submissions) were opposed to the establishment of the six Papamoa East SHAs, and 68 percent (148 of 216 submissions) were opposed to the establishment of Smiths Farm SHA. All those SHAs were to be established on greenfields, nevertheless, there was also opposition to creating SHAs on the brownfield sites of Girven Road (78 percent opposed), Waihi Road (40 percent opposed), and Chadwick Road (39 percent opposed).

Table A.2 (Annex 1) describes the range of issues raised in relation to two or more SHAs. Thirty-two issues were raised. In order of frequency, the 12 most common issues, identified in at least 10 percent of submissions, are presented in Figure 2 below and in Table 1.3, Annex 1. This shows that the top concern was about roading, traffic congestion and safety (mentioned in 62 percent of submissions), with pedestrian and cyclist safety also a highly ranked concern at number 4. The second most common concern was around the consultation process itself (mentioned in 26 percent of submissions). The effects of building height and density were the third most mentioned concern, raised in 24 percent of all submissions.

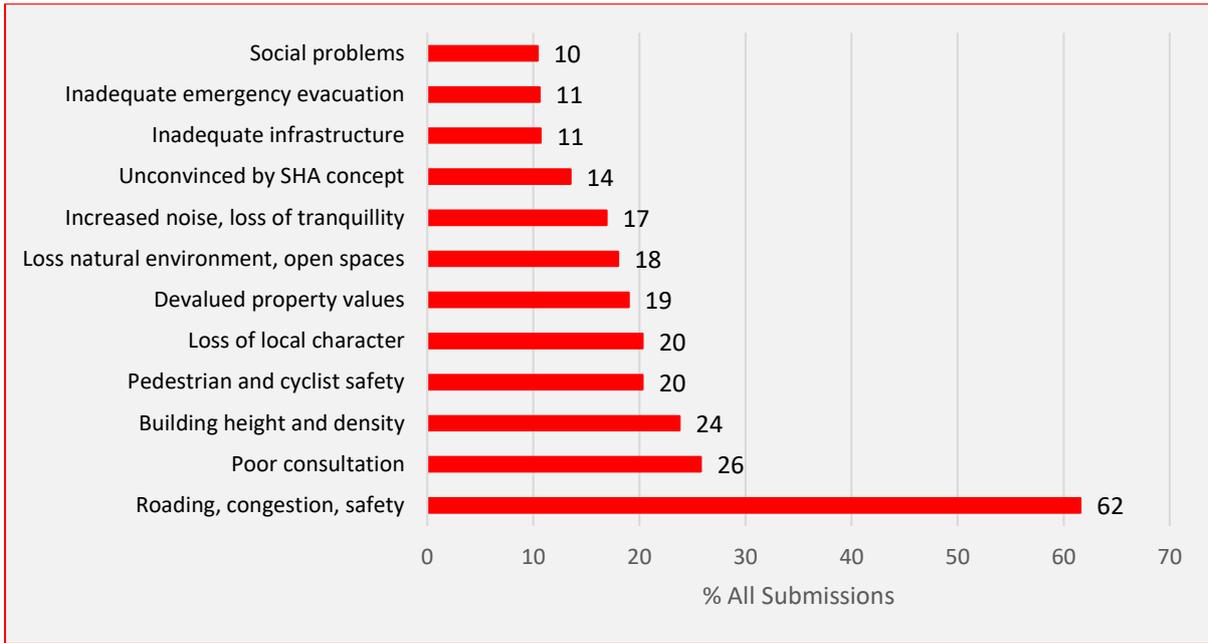


Figure 2: Twelve most common issues in WBOP sub-region SHA submissions (n=603)

Figure 3 shows the spread of the top 12 issues across SHAs and how important each issue was, by examining whether the issue figured in the top three issues for a SHA. Each of the top 12 issues was raised in relation to nine or more SHAs. The top ranking issue, roading, traffic congestion and safety was raised in relation to all 15 SHAs, while the remaining issues were raised in respect of nine to 14 SHAs (see Annex 1, Table A.2).

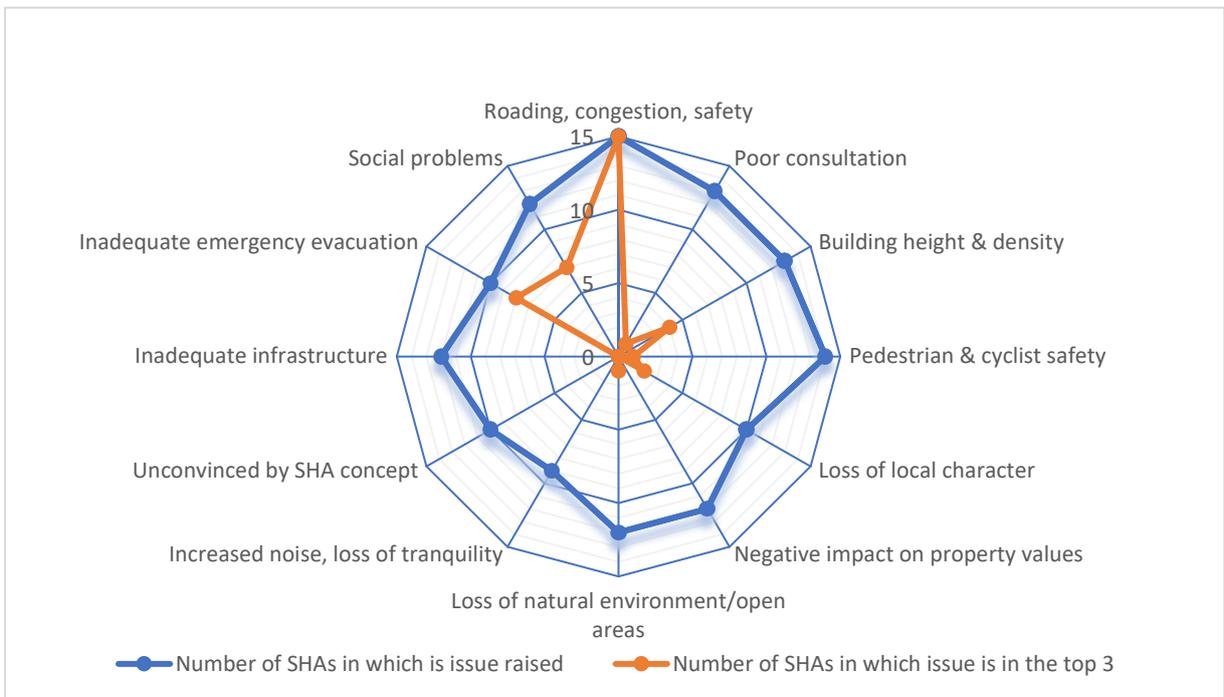


Figure 3: Spread and importance of issues across SHAs

The dominance of roading, traffic congestion and safety is apparent, as it figured in the top three issues in all SHAs. Some of the issues that attracted smaller numbers of mentions in submissions were nevertheless in the top three concerns in relation to multiple SHAs. Two issues stand out in this respect: inadequate emergency evacuation (in the top three in relation to eight SHAs) and the association of social problems with SHAs (in the top three in relation to seven SHAs).

Issues other than those listed in the top 12 were evident across submissions, though mentioned less frequently (Annex 1, Table A.2). These included lack of planning for facilities, shops and services, raised in 32 submissions. Concerns about a lack of a school associated with a new residential development were raised in 37 submissions. Construction impacts on existing residents, such as increased noise, dust and heavy vehicles were raised in 28 submissions. The loss of opportunities afforded by changing existing industrial, commercial and employment zoning of some SHAs to residential was raised in 20 submissions.

In addition to issues raised across two or more SHAs, 17 issues were raised in relation to one SHA only (Annex 1, Table A.4). Six issues were raised in relation to the Smiths Farm SHA. There was strong opposition to the proposed access to the SHA through one road only (88 percent of submissions). There was considerable support (almost half of submissions) for retaining the original rural residential zoning for the area, rather than changing zoning to suburban residential. Other concerns related to council's historical actions and undertakings specific to residential development in that location. Submitters felt that prior agreements relating to the use and status of the land were being overridden. Some specifically stated that they felt "let down" or "misled" by the council. Concern was also expressed about the role of council as developer. The Omokoroa SHA generated six issues specific to that SHA. These revolved around impacts on developers, land values, the appropriation of high quality horticultural and agricultural land for housing and lack of provision for secure rental stock.

Concerns about SHAs were multi-faceted. Figure 4 shows that all SHA proposals generated a number of concerns (see also Annex 1, Table A.1). The largest number of issues, 30, was associated with Smith's Farm. The six Papamoa SHAs, which were covered by one consultation, attracted 27 issues. Although these greenfields sites attracted the most issues, sites within urban areas, such as Girven Road and Chadwick Road, also attracted multiple issues, 23 and 18 respectively.

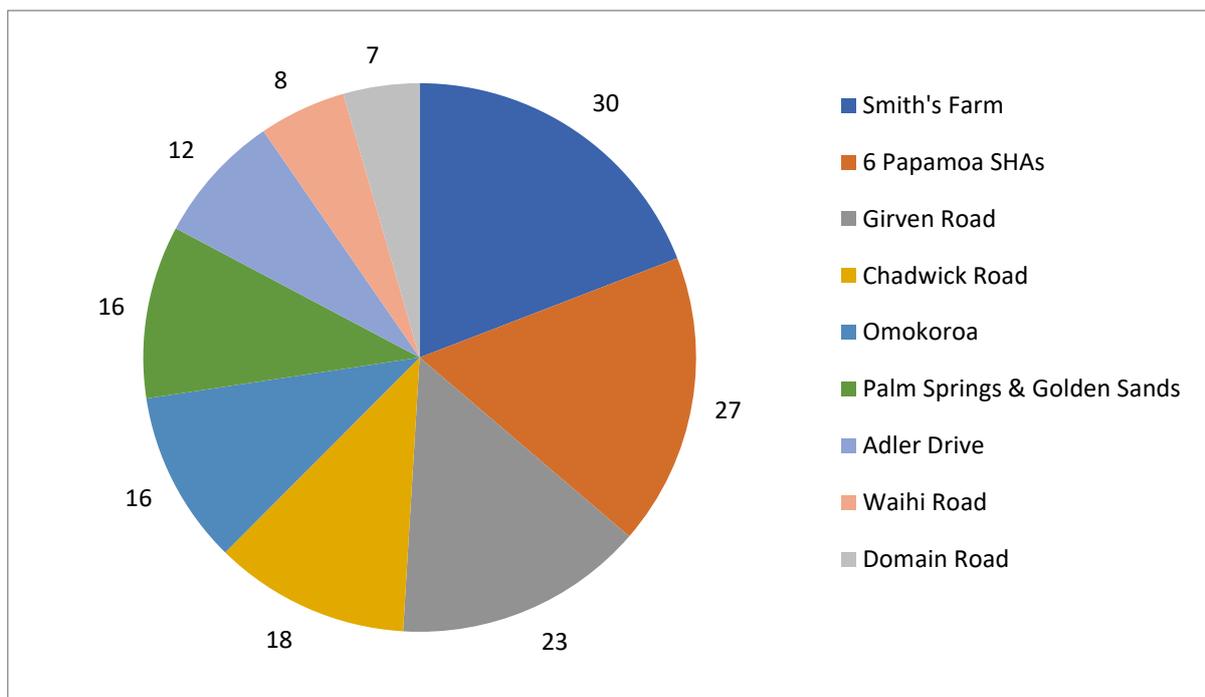


Figure 4: Number of issues raised specific to each SHA consultation

The issues raised about the SHAs can be compared with findings from analysis of 387 submissions across 47 Australian affordable housing project proposals in Parramatta, Sydney (Davison *et al.* 2016). Although the Australian research was solely concerned with affordable housing developments and the proposed SHAs in this study are not strongly targeted to affordable housing, the Australian research findings are broadly comparable with this study's findings (Table 2).

Rank	Parramatta affordable housing developments <sup>8</sup>	Western Bay of Plenty sub-region SHA proposals
1	Parking/traffic	Roading, congestion, safety
2	Inappropriate physical form	Poor consultation
3	Impact on amenity (daylight, privacy etc)	Building height and density
4	Legitimacy of planning process	Pedestrian and cyclist safety
5	Property management	Loss of local character
6	Safety/crime	Devalued property values
7	Socio-economic characteristics of residents	Loss of natural environment, open spaces
8	Transience of residents	Increased noise, loss of tranquillity
9	Impact on property values	Unconvinced by SHA concept
10	Environmental infrastructure issues (flooding, sewerage capacity etc)	Inadequate infrastructure
11	Antisocial behaviour	Inadequate emergency evacuation
12	-	Social problems

Table 2: Top concerns in submissions: comparison of Parramatta study and SHA study

<sup>8</sup> Source: Parramatta study data Davidson *et al* (2016:390).

Although there are differences in the way that issues in the respective studies have been defined and grouped, both studies have found that concerns about traffic/parking and built form dominate objections across the proposals. Also comparable is the concern about the legitimacy of the planning process observed in the Australian research, and this study's finding of opposition to the consultation process around SHAs, and to a lesser extent, objection to SHAs as a planning tool. The Australian research identified various concerns around safety/crime, anti-social behaviour, transience and socio-economic characteristics of residents. These are also themes identified in the SHA submission, elaborated in Section 6.3 below. Both studies also identified submitters' concerns with infrastructure capacity. Concern about the impacts of residential development on property values and the natural environment appeared to be less important in the Australian findings than in this study.

## 6.2 Thematic analysis – Traffic, roads and safety

Regardless of whether the proposed SHA site is a greenfields or brownfields one, by far the most opposition, 62 percent of submissions, was around issues concerning inadequate roading infrastructure, increased traffic volume, congestion and traffic safety. These issues were raised in 372 submissions across all the SHAs, and were the top concern in relation to 11 SHAs. Often submissions also linked those traffic issues with pedestrian and cyclist safety (123 submissions across 14 SHAs), and emergency evacuation routes, in particular for tsunami (64 submissions across 10 SHAs). Comments that linked these issues were particularly apparent in relation to the six Papamoa East SHAs and included the following comments:

*Increased flows on to Beach Road will be unsafe and cause congestion, even with roundabouts ... traffic flowing onto Palm Springs Blvd will be unsafe as the stretch of this road between Papamoa Beach Road and the Wairakei Creek is very narrow, has no cycle lane provision and already causes issues when cars park on the side of the road and children ride their bikes around these (6 Papamoa SHAs).*

*If further development is allowed to proceed without the prior completion of the extension of the Te Okuroa Drive and the connection of this road to the new State Highway 2 then the additional strain on the Papamoa Beach road would be significant and would lead to the following outcomes: a. the possibility of children being injured/killed in a traffic accident would increase significantly ... In the event of a major civil defense [sic] evacuation then the entire population of the area will need to exit through a single road (6 Papamoa SHAs).*

Car parking needs of SHA residents were raised in relation to four SHAs, three of which are brownfields developments. Proposals were criticised for not providing sufficient parking for residents and visitors.

## 6.3 Thematic analysis – Density, quality, social problems and property devaluation

Submissions interweave the themes of increased density, affordable housing, poor quality housing, social problems and the devaluation of property. SHAs are able to undertake residential developments that are denser and with higher buildings than are allowed as of right under the two existing district plans in the sub-region.

Issues around increased building height and dwelling density were raised in relation to both greenfields and brownfields developments, across 13 SHAs and mentioned in 144 submissions. Building height is singled out in 43 submissions relating to five SHAs, for the negative effects on neighbours' access to light and privacy, as this submitter commented:

*While I can support the development for townhouse there is absolutely no way I would want an apartment block overlooking my yard. Daylighting – shadows – privacy (Girven Road).*

Smaller lots sizes were similarly criticised for loss of privacy:

*If the SHA does go ahead I feel that I will lose my privacy ... Imposing neighbours close to my house (Smiths Farm).*

There is a strong assumption that apartments and townhouses, as well as smaller lots and dwellings will be of poor quality, simply because of their size and form. Buildings were described as “boxes”, “concrete bunkers” and “ugly”. Forty-five submissions foresaw negative visual impacts and loss of space emanating from poor development design or poor build design. For example:

*I don't agree with a rubber stamp approach creating box after box row after row with no landscaping or park type areas to provide some sort of visual relief to it all (6 Papamoa SHAs).*

*5 storey buildings in close proximity to the existing mainly single storey development would not fit in with the area and create an eyesore that would be seen for miles (Palm Springs and Golden Sands extensions).*

*We hear the feedback about cheap housing lowering property values, but urban planners know that there are increasing numbers of good more intensive design, but unfortunately these have not yet been well demonstrated locally. Many only judge by what they see small (peas in a pod) detached houses with little room for outdoor living or shared open community spaces ... With the SHA resource consent fast track provisions the community will have little opportunity to comment on such amenity value issues, and will have to rely on Council to set a quality design standard (Omokoroa).*

There is a fear that the density and typology of housing proposed in SHAs, e.g. small houses and lots, multi-units or apartments, will attract residents into the area who are different to current residents. In particular, there is an expectation that future residents are likely to be renters rather than owner-occupiers, and on lower incomes than current residents. Furthermore, there is an expectation that those who are different will bring undesirable and antisocial behaviours. Such behaviours are not always explicitly identified, but when they are, crime, dilapidation of property, increased noise and disturbance are most commonly mentioned. Ghettos, slums, gangs and families with “multiple problems” are also mentioned. Overall, 63 submissions in relation to 12 SHAs associated social problems with SHA developments. The following comments made these connections:

*My biggest concern is what type of people will be living in these townhouses and apartments? (Chadwick Road).*

*The apartments will become rental ghettos and will not be looked after (Palm Springs and Golden Sands extensions).*

Submitters explicitly referred to their dislike of “affordable” or “low cost” housing. A few submissions stated that the main reason they opposed a SHA proposed by an iwi developer, was due to its commitment to affordable and social housing. Often submitters’ opposition was related to the assumed behaviours of residents in affordable housing, as this comment shows:

*Affordable housing brings with it lots of problems including added pressure on local schools and doctors...plus lower income/out of work people that may not be the most desirable of neighbours. There has been an increase in crime in Papamoa why add to it (6 Papamoa SHAs).*

There was a clear desire to maintain residential exclusivity through house price, as these comments show:

*I can only imagine that the level of housing and occupants would be of a lower socioeconomic demographic than the existing region. This would be highly unfair to the existing home owners who paid house prices appropriate to the current ‘level’ of the area (Adler Drive).*

*PLEASE don’t allow pockets of low value cheap housing into the suburbs. It only brings down the value of the neighbouring larger higher value properties. That is the problem with the whole strip from Mount Maunganui to Papamoa East – in that cheap low decile areas are interspersed between higher value properties – it just doesn’t make sense, and doesn’t protect the value of those who invest in the upper end of the market. Look after those who are paying higher rates (6 Papamoa SHAs).*

*Westridge has the highest value of properties than any other street in the Bethlehem/Tauriko area...Placing access to low cost housing at the bottom of our street is going to undervalue our properties and cheapen our assets (Smiths Farm).*

Some submitters contrasted increased density housing with family homes, demonising the former and valorising the latter, for example:

*We are also concerned with the possibility of six level apartment style living ... This style of living is not conducive to the local environment or for family living. Papamoa is currently a safe family friendly community and we want to keep it that way. Forcing through a development of this type will undermine what the community currently is and will produce a ghetto of cheap housing and social problems (6 Papamoa SHAs).*

*We believe this proposed low cost high density housing development is unsuitable and unwanted in a well-established residential zone of mainly single storied family homes. It would be unsightly, cause daylighting, traffic and parking issues for surrounding residents and the larger community ... sold to individual investors and rented to eventually become a problematic and unmanageable complex of flats (Girven Road).*

As several of the above comments show, SHA developments are expected to devalue the assets of existing home owners. Property devaluation was raised by 115 submissions in relation to 12 SHAs. Submitters attributed an expected loss of their property values to the SHA's poor dwelling quality on the one hand, and to the characteristics and activities of incoming residents (especially renters) on the other. The following comments were typical:

*This proposal would devalue our property – there would be undesirables living in a nice area – and to be honest I do not want this. Best you keep us informed so we can move out before property values drop too much (Adler Drive).*

*By putting a development of low cost housing at the end of our street, it only stands to reason that the quality of the area drops and therefore the property values and desire to live here drops with it (Smiths Farm).*

*... an oasis of low cost first or as suspected only homes to accommodate en mass [sic] a group in all likely hood dependent on the public purse. A totally unattractive prospect in our opinion (6 Papamoa SHAs).*

## 6.4 Thematic analysis – Neighbourhood character, lifestyle and environment

Alongside concerns about increased density, social problems and devaluation of property, was the fear of alteration of the character of the neighbourhood. This issue was mentioned in 123 submissions across 10 SHAs. Comments expressed strong attachment to their location. The disruption and changes brought by a SHA were seen to threaten not only their lifestyle, but also the integrity of the place. The feeling of disruption was evident in comments about increased population, influx of residents perceived as undesirable, higher density housing that changes the appearance of the neighbourhood and loss of a tranquil environment. The latter point was commented on in 102 submissions.

The following comments show the strong attachments existing residents have to their neighbourhood environments:

*Current residents chose to live in the area due to low density housing and lifestyle it affords...We don't want thousands of people coming into the area and ruining a lifestyle we cherish (6 Papamoa SHAs).*

*It would destroy the quiet ambience of rural residential forever (Smiths Farm).*

*Proposed dwelling construction is completely different to current houses and not sympathetic to the area (Palm Springs and Golden Sands extensions).*

A theme running through the submissions was that current residents have worked hard to achieve their dream home in paradise and deserve to have their neighbourhood and lifestyle protected from the threat of a SHA development, as these comments show:

*... by all means progress with new housing as I believe it is every Kiwi's right to own their own home and 'live the dream' but don't rob me or my neighbours of ours by linking the proposed SHA to us (Smiths Farm).*

*We are an average couple who have worked extremely hard, physically and financially to get where we are today ... despite a fantastic location, I'm simply not willing to risk or gamble being surrounded by these lower cost housing options (6 Papamoa SHAs).*

The importance of neighbourhood character and sense of place is reinforced by the value some submissions put on the natural environment and open spaces as a key feature of their living environment and lifestyle. Overall, 109 submissions in relation to 12 SHAs commented on threats to habitat, as well as the potential loss of natural features and enjoyment of landscape views, the coast, and open spaces.

While most of the SHAs are greenfields, they are nevertheless close to suburban areas. This proximity may increase the value of trees, bird life, beach access, view shafts and green spaces as relatively rare features in the suburbs that need to be protected. These comments demonstrate the importance of natural features in the suburban environment for residents' wellbeing:

*Height restriction of 17.5 metres would cause obstruction to views to all current residents in our area ... it gives us much pleasure to sit and enjoy the current outlook we have and to lose this would result in unnecessary stress and disappointment (Palm Springs and Golden Sands extensions).*

*No! No! No! You cannot justify losing green spaces ... Looking at a 60ft building instead of low housing and fields was not in the plan when I bought my place (Palm Springs and Golden Sands extensions).*

*As the city encroaches further and further on to the natural habitat of many birds, it is vital to protect the habitat of the birds and also the local residents (Smiths Farm).*

This concern with protecting the landscape and natural environment was not confined to submissions about greenfields SHAs. It was also a theme in relation to brownfields developments, where perhaps natural features are even more valued as these comments suggest:

*There is a large and beautiful pohutukawa tree ... that according to the developers' plans will be cut down. I strongly object to this magnificent native tree being destroyed (Girven Road).*

*The proposed building block of apartments will take away the only view we have of the Kaimai Range ... to take away our outlook will not only impact on the value of our home ... but us personally (Chadwick Road).*

Given that much of the land proposed for SHAs is close to beaches, the threat of inappropriate residential development in the coastal environment was specifically mentioned in a number of submissions. Some focused on the preservation of a natural area. Others wanted to maintain a level of their own exclusive access to a desirable amenity:

*Development needs to enhance the existing housing and develop an area that can offer a positive alternative to families, and others, who want to live by the beach in a secure and comfortable community. This area would then thrive and become another jewel in the crown of this beautiful region – rather than a back block of cheap housing and social problems that the region would be ashamed of (6 Papamoa SHAs).*

*This is prime residential land close to the sea, we fail to see the sense in devaluing the area at the cost to current ratepayers ... (6 Papamoa SHAs).*

The wish to maintain spatial exclusivity was evident in 22 submissions in relation to nine areas including both greenfields and brownfields sites. Those submissions suggested that if additional housing is needed, then there is more suitable land for development than that identified for a SHA in their area. Such comments often reiterated the threat to neighbourhood character and lifestyle if a SHA were to be developed:

*The proposed development of the two and three storied blocks would be intrusive due to the proposed height. They are not aesthetically pleasing or appealing. They would invade current privacy and enjoyment of life. They would permanently impact on the character of the neighbourhood a suburban residential zone. Arataki is currently a largely single story residential housing area and that should be protected and retained (Girven Road).*

*Palm Springs is an exclusive subdivision of larger sections, with exclusive well maintained housing consisting of a community of mid to high income executives, family's [sic] and retired couples who have chosen and paid for the lifestyle living in Palm Springs offers...Papamoa already has housing for the lower-economic banding of sociality of which the community police are often called upon. Please do not consent to another area of this type to be built in Papamoa East and please consider*

*the impact of such housing on those of us who have worked hard to own property here and live here for the current safety, peace, quiet and lifestyle we currently enjoy (6 Papamoa SHAs).*

## 7 Taking into Account the Issues

This section considers to what extent consultation has impacted on decision-making about SHAs. In this case study, consultation appears to have had a negligible effect on the creation of SHAs. Although a majority of submissions were opposed to SHAs, all proposed SHAs to date have been approved by the councils. Nevertheless, staff reports to the councils have included some consideration of issues raised in submissions. There are four main ways in which the issues have been dealt with:

- Pointing to work underway to address issues identified by submitters, such as planning for additional roading and other physical infrastructure, and for the provision of open spaces.<sup>9</sup>
- Noting that submitters' concerns are already covered in existing planning rules and information provision. This was a common response in relation to issues raised about height and lot sizes, residential design, or the management of noise.<sup>10</sup> Similarly, concerns about evacuation in the event of a tsunami were dealt with by noting that tsunami response plans, maps, evacuation options and emergency alert mechanisms already exist.<sup>11</sup>
- Reassurance that some issues will be dealt with later. For instance, traffic issues, a dominant concern raised in relation to all SHA proposals, were responded to with the assurance that traffic assessments would be done as part of the resource consent stage.<sup>12</sup> Other submissions were concerned with the loss of land zoned for employment. The response was that maintaining such zoning is " ... recognised as important and will be provided for on other land in the area."<sup>13</sup>

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<sup>9</sup> See for example, Recommendation on Special Housing Area Requests: Papamoa East Sites DC No 352. Tauranga City Council Meeting 15 December 2014; Recommendation on Special Housing Area Requests: Sunshine Paradise Papamoa and Adler Drive Ohauti. Report to Tauranga City Council, 17 March, 2015, DC44.

<sup>10</sup> See for example, Western Bay of Plenty District Council Policy and Strategy Committee Omokoroa Special Housing Area Approval, 19 November 2014; Recommendation on Special Housing Area Request: 162 Waihi Road, Tauranga DC No 314. Report to Tauranga City Council, 17 November 2014.

<sup>11</sup> Recommendation on Special Housing Area Request: Palm Springs Papamoa East DC No 72. Report to Tauranga City Council, 22 March 2016; Recommendation on Special Housing Area Request: Golden Sands, Papamoa East DC No. 71. Report to Tauranga City Council, 22 March, 2016.

<sup>12</sup> See for example, Recommendation on Special Housing Area Request: 162 Waihi Road, Tauranga DC No 314. Report to Tauranga City Council, 17 November 2014; Recommendation on Special Housing Area Request: Girven Road, Mt Maunganui DC No: 13. Report to Tauranga City Council, 16 February, 2016.

<sup>13</sup> Recommendation on Special Housing Area Requests: Papamoa East Sites DC No 352. Tauranga City Council Meeting 15 December 2014.

- Dismissing concerns. This is most apparent is the way that concerns about possible increase in crime and loss of property values were dismissed with statements that there is “no evidence” for those concerns.<sup>14</sup>

Some issues are not considered in council assessments of feedback. An obvious omission is consideration of the need for SHAs at all in the sub-region, raised in 82 submissions. Similarly, criticism of the consultation process itself, raised in 152 submissions, was not addressed. Substantive issues that were not dealt with, or only briefly, include construction impacts, protection of the natural environment, planning for and development of social infrastructure such as shops and services, provision of public transport, loss of neighbourhood character and increasing affordable housing. In part these omissions can be explained as due to the assessment criteria for SHA proposals, which are based on the HASHAA and do not allow for consideration of the wide range of issues raised in submissions.

Since enhancing housing affordability is the main purpose of HASHAA, the treatment of this issue by the two councils is of particular interest. The concern to achieve housing affordability was raised in only a minority of submissions (32), although this concern was raised in relation to 12 SHAs. It is notable that the Tauranga Housing Accord acknowledges that the city has “issues related to housing affordability” (Minister of Housing and Tauranga City Council 2014). The Western Bay of Plenty Housing Accord also has a focus on “improving housing affordability” and notes “the pressure on individuals for housing costs” (Minister of Housing and Western Bay of Plenty District Council 2014).

What is clear in this case study is that the HASHAA purpose of enhancing affordability has been set aside. The potential for SHAs to be used as a tool to increase the supply of affordable housing in the sub-region has not been vigorously pursued. Tauranga City has distanced itself from a hands-on approach, asserting that affordability will result as a consequence of developers delivering to the market a range of housing types, including smaller sections and dwellings.<sup>15</sup> These comments in staff reports to the Tauranga City Council raise concerns about the impacts of imposing affordability criteria on the market, as well as it being practically difficult to implement and monitor:

*[Tauranga] Staff do not believe that prescribing any affordability criteria as possible under HASHAA is really workable, being too complicated and with monitoring needing resources best used on other projects. In addition, affordability criteria may hinder development and the realisation of other strategic outcomes relevant to these sites.<sup>16</sup>*

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<sup>14</sup> See for example, Recommendation on Special Housing Area Requests: Sunshine Paradise Papamoa and Adler Drive Ohauti. Report to Tauranga City Council, 17 March, 2015, DC44; Recommendation on Special Housing Area Request: Girven Road, Mt Maunganui DC No: 13. Report to Tauranga City Council, 16 February, 2016.

<sup>15</sup> See for example, Recommendation on Special Housing Area Requests: Papamoa East Sites DC No 352. Tauranga City Council Meeting 15 December 2014.

<sup>16</sup> Recommendation on Special Housing Area Requests: Sunshine Paradise Papamoa and Adler Drive Ohauti. Report to Tauranga City Council, 17 March, 2015, DC44

*The [Tauranga] Council has specifically not looked to negotiate affordable housing outcomes on this site. The delivery of affordable housing in this location is difficult due to the economics of multi-level townhouse and apartment construction, and high land values ... The development will however be consistent with the aim of the Housing Accord to deliver smaller dwellings.<sup>17</sup>*

A similar quandary in addressing affordability was evident in the Western Bay of Plenty District. While the Council stated during consultation on the Omokoroa SHA that the SHA was intended to open up land for more affordable housing, staff nevertheless commented on the difficulty of achieving affordable housing and therefore suggested that a certain proportion of affordable housing be required of developers, i.e. 50 percent of house and land packages approximately aligning with the median house price of the time (Western Bay of Plenty District Council 2014). This proportion was then reduced to 25 percent in the first Order in Council in 2015 (James 2017). Later, any requirement for a proportion of affordable housing was revoked by the second Order in Council in 2017, which does not prescribe any affordability criteria.<sup>18</sup> Instead, the council intends to consider affordability through an internal policy.

The one exception where public feedback has had some impact on policy and action, is in relation to the Smiths Farm proposal. Residents' expectations about the use of Smiths Farm and associated perceptions of historical promises made by the council generated the largest number of submissions of any of the SHA proposals, 216. Concerns about traffic, road access and the council's previously stated intentions for the land were paramount. Following consideration of those submissions, in May 2016 the Tauranga City Council agreed that access to the SHA would not be through a residential street (the subject of 191 objections), but instead alternative access would be constructed. Council also agreed to develop a buffer area between existing rural residential zoned housing and the proposed SHA. This buffer is planned to consist of rural residential lots, as well as stormwater drainage reserves, to "help preserve the quiet and secluded nature of the Westridge subdivision."<sup>19</sup> Council has further delayed decision-making about development of the SHA, to coordinate with the construction of a major arterial link. This means that rezoning of the site will occur through the City Plan and a fully notified plan change process, not the SHA mechanism (Keber 2016). It is not clear that this deferral was strongly influenced by public feedback, since council explanations focus on better coordination and cost sharing between agencies, reduced risks, efficiencies, and increased revenue to council from land sale.<sup>20</sup> However, this change in timing and process will enable wider consultation with the community than under the SHA process. Subsequent to

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<sup>17</sup> Recommendation on Special Housing Area request: 305 Chadwick Road, Greerton (DC 130). Report to Tauranga City Council 20 June, 2017.

<sup>18</sup> *Housing Accords and Special Housing Areas (Western Bay of Plenty District) Order 2017*, clause 6, accessed May 12, 2017 <http://www.legislation.govt.nz/regulation/public/2017/0036/latest/whole.html>

<sup>19</sup> Tauranga City Council web page "Council to consider three options for the development of Smiths Farm Bethlehem" [http://www.tauranga.govt.nz/council/council-news-and-updates/latest-news/news-archive/aid/42222/tctl/2197\\_viewannouncement](http://www.tauranga.govt.nz/council/council-news-and-updates/latest-news/news-archive/aid/42222/tctl/2197_viewannouncement)

<sup>20</sup> Tauranga City Council web page "Council decision on timing of Smiths Farm development" [http://www.tauranga.govt.nz/council/council-news-and-updates/latest-news/news-archive/aid/43940/tctl/2197\\_viewannouncement](http://www.tauranga.govt.nz/council/council-news-and-updates/latest-news/news-archive/aid/43940/tctl/2197_viewannouncement)

those decisions the council has elicited further public feedback by asking on its website for views about residential development on Smiths Farm. It stated that “We want to understand these issues so that our Councillors can make informed decisions.”<sup>21</sup>

While the council’s responses to objections about the Smiths Farm proposal have resulted in some process and substantive changes, this example does not deny the overall selective responses to issues raised in submissions. In summary, councils have responded in four ways: by saying that the issues raised are currently being addressed, will be addressed later, are not an issue or the issue is ignored. Such treatment of public feedback is familiar to readers of citizen participation literature. Issues are summarised, extracted and selected according to the agency’s predominant interests and concerns (Lezaun and Soneryd 2006). Sometimes that agency focus constrains the scope of debate and ignores the “needs and desires that [participants] have” (Fung 2015:9). Residents’ views can be dismissed as irrational or uninformed; instead there is a privileging of “technical expertise”, rather than acknowledgement of local knowledge or expertise (Fung 2006:69).

Overall, these consultations illustrate the underlying intent of the HASHAA to achieve changes with minimal public involvement. There is no statutory imperative to take into account issues raised in public feedback, to acknowledge diverse views and issues, or to work through potential conflicts among different parts of the community. Furthermore, the criteria for assessing SHA proposals do not cover the issues submitters identify as important. This suppresses local voices, thus reducing opportunities for resource holders and council decision-makers to learn about what people consider is important for their living environments. Yet the councils also show they have attempted to legitimise their policies and actions through running consultation processes wider than the discretionary activities allowed in HASHAA, and by responding in part to the feedback received.

## 8 Concluding Comments

This case study has explored one aspect of New Zealand’s complex planning system, the SHA model, and its implications for the built environment. SHAs are an example of top-down decision-making that subsumes local planning processes to central government directives and limits the role of public participation in decision-making about residential development. Within that overall terrain, this case study shows how the two councils in the Western Bay of Plenty sub-region have sought the views of the wider public about the creation of SHAs. Even though public feedback does not appear to have strongly influenced assumptions and practices around SHAs, the act of seeking feedback has opened up the terrain of debate. This paper suggests that ideas and solutions relevant to local needs and preferences around housing and the built environment can emerge from engagement. The submissions generated from those consultations are important sources of information that contribute to understanding:

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<sup>21</sup> Tauranga City Council web page “Smiths Farm” <http://www.tauranga.govt.nz/our-future/projects/smiths-farm>

- Residents' perceptions of SHAs as a planning tool.
- The aspirations that people have for their housing and neighbourhood environment.
- The role of consultation in decision-making about residential development.

What is striking about residents' responses to SHAs in this case study is their strong opposition. That opposition is not only in relation to greenfields sites but also to urban sites. A core of submissions is critical of the SHA concept itself. They question its use because it overrides the RMA process, which includes a duty to consult. The SHA approach is seen as unfair in that it ignores local plans that set out the strategic objectives, policies and rules shaping land use planning. Those plans have been developed with public consultation. Many of those critical submissions further question the efficacy of SHAs as a mechanism to resolve complex and intractable housing supply and affordability problems.

Those submissions questioning whether SHAs will deliver affordable housing speak to a growing concern about a lack of housing options and the exclusion of a widening pool of consumers from the housing market such as first-home buyers, young families, renters and retired people on low incomes. With one exception, the SHAs as proposed do not directly address any of their housing needs. It appears that, apart from directly affected landowners, developers and residents, others also with a vital stake in the creation and success of SHAs such as future SHA residents and those struggling to achieve decent housing, have not been actively engaged. Despite the two councils seeking public feedback, the large majority of submitters were nearby residents and land-owners. This is a deficit in the way in which public feedback about SHA proposals has been sought.

The richness and value of submissions is seen in their traversal of matters far wider than the housing SHAs might or might not deliver. They raise concerns about the perceived impacts of SHA developments, ranging from immediate construction impacts, to criticism of development and building design, inadequate physical and social infrastructure to support a considerable increase in population, and impacts on open spaces and the natural environment. Submissions speak to frequently contentious and contested aspects of residential development, as expressed in comments about intensification, greenfields vs brownfields development and the provision of affordable housing. In all, over 30 issues were raised across the SHAs, indicating that these concerns are not focused solely on individual interest but on identifying wider social and environmental impacts.

Each SHA site has its own history and particular location, and these dimensions have often driven the issues preoccupying submitters. Each SHA proposes a new use of space through the re-definition of land use and ultimately its value. The SHA not only transforms the physical environment, but also transforms the social environment, social expectations and social relations. Many submissions suggested that SHAs have the potential to disrupt existing socio-spatial connections. Submitters were concerned with challenges to existing travel patterns and the implications of new routes and increased traffic volumes. They raised the possibility of a SHA severing connections with amenities and existing neighbours or, on the other hand, opening up the possibility of interactions with new, different and "undesirable" neighbours.

It is no surprise that the SHA proposals generated widespread concerns about the impacts of residential development in the coastal area. The locations of many of the proposed SHAs are close to the coast and beaches, which engender strong feelings of identity and attachment among residents. Coasts are simultaneously major sites of residential growth in New Zealand and key places in people's emotional resistance to development pressure. These responses to the SHAs illustrate what Kearns and Collins refer to as "place-protective" (Kearns and Collins 2012:938).

Submissions also reveal personal housing preferences and aspirations, as expressed through comments on the design, typology and size of proposed dwellings, as well as the design of the development. The submissions uncover a deep dissatisfaction with the quality of housing and the built environment. Discourses throughout the submissions reveal a strong dislike of medium density and multi-storey housing. This is often linked to comments about poor quality design and construction, as well as fear of change to the neighbourhood's appearance and character. These tensions are long-standing in the sub-region, where there has been resistance to large scale intensification projects.<sup>22</sup> That resistance echoes dominant themes of urban planning and housing research about conflict and ambivalence concerning densification and affordable housing.

Many reactions to SHAs appear to reinforce the negative description of all opposition to residential development as inspired by NIMBYism. This is not surprising, considering the sections of the community that did and did not make a submission. The majority of submissions were from nearby residents and land owners, and the voices of those most vulnerable in the housing market such as renters, those on low incomes and first home buyers, were very muted. There was no articulation of their housing needs except through the comments of a few individuals and two community housing providers.

Despite what some may interpret as NIMBY opposition, the number and variety of themes as listed in Annex 1 show the contested and complex nature of SHA proposals and that objections range wider than an overriding concern with blocking development. This suggests a more nuanced analysis of the public's views is required, rather than seeing objections as simply examples of self-interested local opposition. Even those criticisms of SHAs, which may be considered narrowly self-interested, can also be seen as entirely rational expressions of housing market behaviour and expectations. In particular, the fear of property devaluation and associated loss of security expressed in submissions is understandable, if not evidence-based,<sup>23</sup> given that homeownership is for most people their biggest financial asset and wealth pathway. The narrative of property devaluation also reads to the strong New Zealand desire for homeownership and its association with personal wellbeing and independence.

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<sup>22</sup> SmartGrowth Update: Residential Intensification: Research Brief  
[https://www.smartgrowthbop.org.nz/media/1434/g-residential\\_intensification\\_brief\\_final\\_.pdf](https://www.smartgrowthbop.org.nz/media/1434/g-residential_intensification_brief_final_.pdf)

<sup>23</sup> Evidence from overseas research has found that there are no universally positive or negative impacts of affordable housing projects on property values. Any positive or adverse impacts are negligible, and price differences can be explained by a variety of other factors such as services, location and proximity to public transport (Davison *et al.* 2017). Evidence from Queenstown inclusionary zoning that includes affordable housing supports these findings, as it has shown no significant positive or negative impacts on house prices of neighbouring properties (Eaqub 2017).

This is not to say that some feedback should not be vigorously challenged. Even though the councils do not expect the majority of proposed dwellings in SHA developments to fall into affordable or social housing categories, the public's association of SHAs with such housing is widespread. Far more submissions are critical of affordable and "low cost" housing than are supportive. A negative perception that affordable housing will inevitably generate social problems and drive down property values is woven throughout many of the submissions. There is a clear desire in submissions to maintain exclusivity and restrict access to desirable areas and amenities through house prices.

The discourses around affordable housing, property devaluation and exclusivity show an acceptance of social and economic inequality. Comments in some submissions reveal not only this acceptance, but also active attempts at exclusion through labelling future SHA residents and their behaviours pejoratively. They express class and racial stereotypes as well as stigmatisation and prejudice against those perceived as different, particularly renters, beneficiaries, residents in social housing and non-family groups. Also threaded through the submissions is a discourse of victimisation, not in reference to those struggling to access housing, but in relation to the submitters themselves who regard their privileged, private and secure position as threatened by SHA proposals for medium density housing. These exclusionary and oppositional narratives ignore the history and cultural geography of the areas in which the SHAs are located. In contrast to such narratives is the inclusionary approach of Ngā Potiki SHA located on Treaty settlement land and reflecting not only the intent to provide housing for hapū members, but also for the wider community, including those needing affordable and social housing.

Nothing in the SHA model enables easy resolution of these divisions. Furthermore, councils' ambivalence about the efficacy of SHAs in providing affordable housing reinforces negative public views. Councils have called affordability criteria unworkable, too complicated and hard to monitor.<sup>24</sup> Householders' desire for residential exclusivity is also supported by some aspects of the current planning system, for example, through planning rules determining building height and lot sizes, as well as the widespread use of private subdivision covenants to exclude smaller dwellings and certain housing types and design features that contribute to affordability.

Despite these divisive narratives, the information gained from the consultations could open up opportunities to draw on local experiential knowledge and stimulate wider community dialogue about the design of homes and residential developments. The dissatisfactions with the quality of housing and the built environment articulated in the submissions are instructive. Clearly apparent is the strong value placed on housing that provides privacy, access to sun, light, and views. Submissions also ask for development design to pay attention to noise control, traffic management, the safety of all road users (not only motorists), adequate parking, landscaping and green spaces, the visual appearance of buildings, the siting

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<sup>24</sup> Recommendation on Special Housing Area Requests: Sunshine Paradise Papamoa and Adler Drive Ohauiti. Report to Tauranga City Council, 17 March, 2015, DC44; Recommendation on Special Housing Area request: 305 Chadwick Road, Greerton (DC 130). Report to Tauranga City Council 20 June, 2017; Western Bay of Plenty District Council Policy and Strategy Committee Omokoroa Special Housing Area Approval 19 November, 2014.

of housing in relation to neighbours and the provision of amenities and services alongside residential development. These findings are consistent with large overseas studies, which show that important urban environmental quality factors associated with community satisfaction are aesthetics/beauty, the presence of nature, the smoothness of walking and biking, and accessibility of local amenities (Kyttä 2013). Furthermore, it is notable that a minority of submissions express positive expectations that SHAs could be used to deliver affordable housing, different housing typologies to suit a diverse population and improved living environments with environmentally sustainable features, universal design and age-friendly, walkable and connected neighbourhoods. The public's contributions to ideas about settlement planning identified in this case study show the benefits of public involvement despite the deficits in the SHA model, which has no mandatory requirements for consultation.

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- Western Bay of Plenty District Council Policy and Strategy Committee *Omokoroa Special Housing Area Approval, 19 November 2014*. [http://www.westernbay.govt.nz/our-council/agendas-and-minutes/council-meeting-documentation/Documents/C2-Agenda-Open-%2015%20December%202016 Part4.pdf](http://www.westernbay.govt.nz/our-council/agendas-and-minutes/council-meeting-documentation/Documents/C2-Agenda-Open-%2015%20December%202016%20Part4.pdf)
- Western Bay of Plenty District Council 2016 *Re-establishment of Omokoroa Special Housing Area Council Minute C216.14* 15 Dec 2016.

### **Media and web pages**

- Department of Internal Affairs web page “How councils should make decisions” [http://www.localcouncils.govt.nz/lqip.nsf/wpg\\_url/About-Local-Government-Local-Government-In-New-Zealand-How-councils-should-make-decisions](http://www.localcouncils.govt.nz/lqip.nsf/wpg_url/About-Local-Government-Local-Government-In-New-Zealand-How-councils-should-make-decisions)
- Keber R. 2016 “Smiths Farm development delayed” *Bay of Plenty Times*, 18 May, 2016.
- Ministry for the Environment web page “How consultation may be conducted” <http://www.mfe.govt.nz/publications/rma/guidelines-consulting-tangata-whenua-under-rma-update-case-law/5-how-consultation>
- Omokoroa Omelette 2014 “Special Housing Area Opportunity for Omokoroa” September 2014, *Omokoroa Omelette*. <http://haveyoursay.westernbay.govt.nz/7312/documents/16170>
- SmartGrowth Update: Residential Intensification: Research Brief [https://www.smartgrowthbop.org.nz/media/1434/g-residential\\_intensification\\_brief\\_\\_final\\_.pdf](https://www.smartgrowthbop.org.nz/media/1434/g-residential_intensification_brief__final_.pdf)
- Tauranga City Council web page “Council decision on timing of Smiths Farm development” [http://www.tauranga.govt.nz/council/council-news-and-updates/latest-news/news-archive/aid/43940/tctl/2197\\_viewannouncement](http://www.tauranga.govt.nz/council/council-news-and-updates/latest-news/news-archive/aid/43940/tctl/2197_viewannouncement)
- Tauranga City Council web page “Council to consider three options for the development of Smiths Farm Bethlehem” [http://www.tauranga.govt.nz/council/council-news-and-updates/latest-news/news-archive/aid/42222/tctl/2197\\_viewannouncement](http://www.tauranga.govt.nz/council/council-news-and-updates/latest-news/news-archive/aid/42222/tctl/2197_viewannouncement)
- Tauranga City Council web page “Smiths Farm” <http://www.tauranga.govt.nz/our-future/projects/smiths-farm>
- Tauranga City Council web page “Tangata Whenua Collective” <https://www.tauranga.govt.nz/community/tangata-whenua/tangata-whenua-committees-and-groups/tangata-whenua-collective>

## Annex 1 Tables

Table A.1: Number of Submissions and Issues Across Consultations

Consultation	No. of Submissions	Oppose	Support <sup>25</sup>	Neutral	Issues <sup>26</sup> raised (count of submissions raising the issue in bracket)
Palm Springs <sup>27</sup> Papamoā Junction Zariba/Terrace View Ngā Potiki Golden Sands Te Okuroa Drive / Parton Road	152	125	22	5	Roading, traffic volume, congestion and safety (88)
					Lack of emergency evacuation routes (44)
					Perceived social problems associated with density and rental housing (29)
					Devaluing of existing housing (25)
					Building height, density (21)
					Lack of infrastructure (19)
					Need to protect natural environment, provide open spaces (19)
					Loss of existing commercial and employment zones (18)
					Inadequate consultation (18)
					Pedestrian / cyclist safety (16)
					No demonstrated demand for more residential sections (13)
					Lack of shops, facilities, services (11)
					Lack of schools (10)
					Construction impacts (6)
					Affordable housing will not be achieved (6)
					Risk of poor build quality (6)
					Flood risk (7)
					Urban design (5)
					Need public transport (4)
					No need for SHA, use standard RMA process (3)
Proposal is not consistent with built character of the area (4)					
Increased noise, loss of tranquillity (1)					
Other areas are better for this type of residential development (1)					
Reverse sensitivity from existing industrial premises (1)					
Restrictive covenants (1)					
Possible archaeological sites (1)					

<sup>25</sup> The numbers in the support column include both support and conditional support.

<sup>26</sup> Note: 'Lack of Infrastructure' excludes roading, but includes mention of other physical infrastructure such as water, sewerage, electricity; 'Construction impacts' examples include increase heavy vehicle and machinery movement, noise and dust.

<sup>27</sup> Recommendation on Special Housing Area Requests: Papamoā East Sites DC No 352. Tauranga City Council Meeting 15 December 2014. These proposals collectively dealt with 6 Papamoā East SHAs.

Consultation	No. of Submissions	Oppose	Support	Neutral	Issues raised (count of submissions raising the issue in bracket)
Waihi Rd <sup>28</sup>	10	4	1	5	Increased traffic (4)
					Car parking requirements (3)
					Small house and section sizes (2)
					Housing scale and density (2)
					Set back and shading issues (2)
					Will there be an opportunity at the resource consent stage to make a submission? (2)
					Increased noise (1)
					Poor quality of the development, and use as rentals (1)
Omokoroa <sup>29</sup>	16	5	4	7	Lack of shops, facilities, services and schools (6)
					Traffic impacts and the need for improved roading infrastructure (5)
					Urban design (4)
					Perceived social problems associated with density and rental housing (4)
					Lack of local employment (3)
					Risk of poor build quality (2)
					Costs of development and financial contributions (2)
					Undermining competition through preferential treatment to selected developers (2)
					Appropriation of high quality horticultural and agricultural land for housing, and potential reverse sensitives (2)
					The need for infrastructure and its costs (2)
					Affordable housing will not be achieved (2)
					Distortion of the market if land is not valued appropriately (1)
					Possible impacts on zoning and development potential of areas adjacent to a SHA (1)
					Lack of consideration of need for secure rental stock (1)
Inadequate consultation (1)					
Pedestrian/cyclist safety (1)					

<sup>28</sup> Recommendation on Special Housing Area Request: 162 Waihi Road, Tauranga DC No 314. Report to Tauranga City Council, 17 November 2014.

<sup>29</sup> Number includes website comments and written submissions. Most of the website comments did not express a view either supporting or opposing the SHA.

Consultation	No. of Submissions	Oppose	Support	Neutral	Issues raised (count of submissions raising the issue in bracket)
Adler Drive <sup>30</sup>	42	40	1	1	Traffic noise, speed and congestion (34)
					Devaluing of existing housing (25)
					Need to protect natural environment, provide open spaces (13)
					Lack of shops, facilities, services (11)
					Lack of schools (9)
					Pedestrian safety (8)
					Density (7)
					Other areas better for residential development, sufficient sections available (7)
					Inadequate consultation (6)
					Affordable housing will not be achieved (3)
					Risk of poor build quality (2)
Need public transport (2)					
Domain Road <sup>31</sup>	20	9	8	2	Building height and overshadowing effects (10)
					Traffic safety and congestion (7)
					Pedestrian/cyclist safety (3)
					Proposed retail/commercial in development not warranted (8)
					Flood risk (5)
					Car parking (4)
Affordable housing will not be achieved (2)					
Smith's Farm <sup>32</sup>	216	148	38	30	Access to SHA through Westridge Drive (191)
					Roading, traffic volume, congestion and safety (181)
					Inadequate consultation (112)
					Retain original zoning (rural residential) (107)
					Increased noise, loss of tranquillity (93)
					Unsafe school bus service (93)
					Loss of residential / neighbourhood character (92)
					Pedestrian/cyclist safety (84)
					Feel misled/let down by council (83)
					Density (81)
Need to protect natural environment, provide open spaces (66)					
No need for SHA (66)					

<sup>30</sup> Recommendation on Special Housing Area Requests: Sunshine Paradise Papamoa and Adler Drive Ohauti. Report to Tauranga City Council, 17 March, 2015, DC44

<sup>31</sup> Recommendation on Special Housing Area Requests: Sunshine Paradise Papamoa and Adler Drive Ohauti. Report to Tauranga City Council, 17 March, 2015, DC44

<sup>32</sup> Proposal to establish a Special Housing Area: Smiths Farm DC No: 355. Report to Tauranga City Council, 15 December, 2015.

Consultation	No. of Submissions	Oppose	Support	Neutral	Issues raised (count of submissions raising the issue in bracket)
Smith's Farm <i>(cont. from above)</i>	216	148	38	30	Devaluing of existing housing (44)
					Possible impacts on zoning and development potential of areas adjacent to a SHA (38)
					Object to council as developer (37)
					Lack of infrastructure (21)
					Construction impacts (20)
					Flood risk /stormwater problems (20)
					No demonstrated demand for residential sections (12)
					Affordable housing will not be achieved (12)
					Other areas are better for this type of residential development (11)
					Urban design (9)
					Need public transport (8)
					Lack of schools (6)
					Perceived social problems associated with density and rental housing (5)
					Lack of housing and tenure diversity (4)
					Lack of shops, facilities, services (4)
Lack of emergency evacuation routes (3)					
Risk of poor build quality (2)					
Need to protect archaeological sites and Maori heritage sites (1)					
Girven Road <sup>33</sup>	42	33	6	3	Building height, overshadowing and privacy effects (25)
					Density (23)
					Traffic safety and congestion, (23)
					Car parking (23)
					Perceived social problems associated with density and rental housing (15)
					Loss of residential/neighbourhood character (12)
					Devaluing of existing housing (9)
					Flood risk (8)
					Other areas are better for this type of residential development (8)
					Childcare not suitable for site (8)
					Lack of infrastructure (8)
					Increased noise (7)
Lack of on-site facilities (7)					

<sup>33</sup> Recommendation on Special Housing Area Request: Girven Road, Mt Maunganui DC No: 13. Report to Tauranga City Council, 16 February, 2016.

Consultation	No. of Submissions	Oppose	Support	Neutral	Issues raised (count of submissions raising the issue in bracket)
Girven Road <i>(cont. from above)</i>	42	33	6	3	No need for SHA (7)
					Inadequate consultation (6)
					Affordable housing will not be achieved (5)
					Lack of emergency evacuation routes (4)
					Risk of poor build quality (4)
					Loss of outlook (4)
					Loss of camping ground (2)
					Pedestrian/cyclist safety (2)
					No demonstrated demand for residential sections (1)
					Protect natural environment, open spaces (1)
Palm Springs Extension <sup>34</sup>	27	16	8	3	Timing of roading construction, traffic safety and congestion, (14)
					Loss of residential/neighbourhood character (6)
					Lack of emergency evacuation routes (6)
					Lack of infrastructure (5)
					Inadequate consultation (4)
					Devaluing of existing housing (3)
					Loss of open spaces and recreational amenity (3)
					Pedestrian safety (3)
					No need for SHA (3)
					Building height, overshadowing and loss of privacy (1)
					Lack of schools (1)
					Density (1)
					Need local employment (1)
					Restrictive covenants (1)
					Perceived social problems associated with density and rental housing (2)
Proposed substation nearby (1)					

<sup>34</sup> Palm Springs and Golden Sands Papamoa East were dealt with together in public consultation. See: Recommendation on Special Housing Area Request: Palm Springs Papamoa East DC No 72. Report to Tauranga City Council, 22 March 2016; Recommendation on Special Housing Area Request: Golden Sands, Papamoa East DC No. 71. Report to Tauranga City Council, 22 March, 2016. Note their submissions counts and the issues raised have been separated for the purposes of this table.

Consultation	No. of Submissions	Oppose	Support	Neutral	Issues raised (count of submissions raising the issue in bracket)
Golden Sands Southern Extension <sup>35</sup>	35	19	11	4	Timing of roading construction, traffic safety and congestion (16)
					Loss of residential/neighbourhood character (9)
					Lack of infrastructure (8)
					Lack of emergency evacuation routes (7)
					Inadequate consultation (7)
					Devaluing of existing housing (7)
					Building height, overshadowing and loss of privacy (5)
					Lack of schools (4)
					Loss of open spaces and recreational amenity (4)
					Pedestrian safety (3)
					No need for SHA (3)
					Density (3)
					Need local employment (1)
					Restrictive covenants (1)
Chadwick Rd <sup>36</sup>	43	17	19	6	Traffic volumes, congestion, safety (24)
					Perceived social problems associated with density and rental housing (7)
					Building height and density (6)
					Insufficient on-site car parking (6)
					Impact on existing residents' visual amenity and privacy (4)
					Need to protect natural environment, provide open spaces (3)
					Pedestrian safety (3)
					Loss of industrial zone (2)
					Lack of infrastructure (2)
					Devaluing of existing housing (2)
					Other areas better for residential development (2)
					Reverse sensitivity from existing industrial premises (2)
					Construction impacts (2)
					Flood risk (2)
					Lack of schools (1)
					Ensure affordable housing is achieved (1)
Possible site contamination (1)					
Possible archaeological sites (1)					

<sup>35</sup> Palm Springs and Golden Sands Papamoa East were dealt with together in public consultation. See FN 34 above.

<sup>36</sup> Recommendation on Special Housing Area request: 305 Chadwick Road, Greerton (DC 130). Report to Tauranga City Council 20 June, 2017.

Table A.2: Issues raised about Two or More SHAs

Issue	No. of Submissions raising issue by SHA	No. of SHAs in which issue raised	Total no. of submissions on issue
Traffic, roading, congestion, safety	88/152 – six Papamoa East SHAs 4/10 – Waihi Road 5/16 – Omokoroa 34/42 – Adler Drive 23/42 – Girven Road 7/20 – Domain Road 181/216 – Smiths Farm 14/27 – Palm Springs extension 16/35 – Golden Sands extension 24/43 – Chadwick Road	15	372
Inadequate consultation	18/152 - six Papamoa East SHAs 2/10 – Waihi Road 1/16 – Omokoroa 6/42 – Adler Drive 112/216 – Smiths Farm 6/42 – Girven Road 4/27 – Palm Springs extension 7/35 – Golden Sands extension	13	156
Building height, density, small sections and dwellings	21/152 – six Papamoa East SHAs 2/10 – Waihi Road 7/42 – Adler Drive 81/216 – Smiths Farm 23/42 – Girven Road 1/27 – Palm Springs extension 3/35 – Golden Sands extension 6/43 – Chadwick Road	13	144
Pedestrian / cyclist safety	16/152 – six Papamoa East SHAs 1/16 – Omokoroa 8/42 – Adler Drive 3/20 – Domain Road 84/216 – Smiths Farm 2//42 – Girven Road 3/27 – Palm Springs extension 3/35 – Golden Sands extension 3/43 – Chadwick Road	14	123
Loss of residential / neighbourhood character	4/152 – six Papamoa East SHAs 92/216 – Smiths Farm 12/42 – Girven Road 6/27 – Palm Springs extension 9/35 – Golden Sands extension	10	123
Devaluation of existing housing	25/152 – six Papamoa East SHAs 25/42 – Adler Drive 44/216 – Smiths Farm 9/42 – Girven Road 3/27 – Palm Springs extension 7/35 – Golden Sands extension 2/43 – Chadwick Road	12	115
Protection of natural environment, open spaces	19/152 – six Papamoa East SHAs 13/42 – Adler Drive 66/216 – Smiths Farm 1/42 – Girven Road 3/27 – Palm Springs extension 4/35 – Golden Sands extension 3/43 – Chadwick Road	12	109

Issue	No. of Submissions raising issue by SHA	No. of SHAs in which issue raised	Total no. of submissions on issue
Increased noise, loss of tranquillity	1/152 – six Papamoa East SHAs 1/10 – Waihi Road 93/216 – Smiths Farm 7/42 – Girven Road	9	102
No need for a SHA	3/152 – six Papamoa East SHAs 66/216 – Smiths Farm 7/42 – Girven Road 3/27 – Palm Springs extension 3/35 – Golden Sands extension	10	82
Lack of physical infrastructure	19/152 – six Papamoa East SHAs 2/16 – Omokoroa 21/216 – Smiths Farm 8/42 – Girven Road 5/27 – Palm Springs extension 8/35 – Golden Sands extension 2/43 – Chadwick Road	12	65
Lack of emergency evacuation routes	44/152 – six Papamoa East SHAs 3/216 – Smiths Farm 4/42 – Girven Road 6/27 – Palm Springs extension 7/35 – Golden Sands extension	10	64
Social problems	29/152 – six Papamoa East SHAs 1/10 – Waihi Road 4/16 – Omokoroa 5/216 – Smiths Farm 15/42 – Girven Road 2/35 – Golden Sands extension 7/43 – Chadwick Road	12	63
Height shading/overshadowing issues	2/10 – Waihi Road 10/20 – Domain Road 25/42 – Girven Road 1/27 – Palm Springs extension 5/35 – Golden Sands extension	5	43
Flood risk /stormwater problems	7/152 – six Papamoa East SHAs 5/20 – Domain Road 20/216 – Smiths Farm 8/42 – Girven Road 2/43 – Chadwick Road	10	42
Possible impacts of zoning and development potential of areas adjacent to a SHA	1/16 – Omokoroa 38/216 – Smiths Farm	2	39
Lack of schools	10/152 – six Papamoa East SHAs 6/16 – Omokoroa 9/42 – Adler Drive 6/216 – Smiths Farm 1/27 – Palm Springs extension 4/35 – Golden Sands extension 1/43 – Chadwick Road	12	37
Car parking requirements	3/10 – Waihi Road 4/20 – Domain Road 23/42 – Girven Road 6/43 – Chadwick Road	4	36

Issue	No. of Submissions raising issue by SHA	No. of SHAs in which issue raised	Total no. of submissions on issue
No demonstrated demand for more residential sections	13/152 - six Papamoa East SHAs 7/42 – Adler Drive 12/216 – Smiths Farm 1/42 – Girven Road	9	33
Difficulties of achieving and retaining affordable housing	6/152 – six Papamoa East SHAs 3/42 – Adler Drive 2/20 – Domain Road 2/16 – Omokoroa 12/216 – Smiths Farm 5/42 – Girven Road 1/43 – Chadwick Road	12	32
Lack of shops, facilities, services	11/152 – six Papamoa East SHAs 6/16– Omokoroa 4/216 – Smiths Farm 11/42 – Adler Drive	9	32
Construction impacts	6/152 – six Papamoa East SHAs 20/216 – Smiths Farm 2/43 – Chadwick Road	3	28
Other areas better for development	1/152 – six Papamoa SHAs 11/216 – Smiths Farm 8/42 Girven Road 2/43 – Chadwick Road	9	22
Loss of existing zoning	18/152 – six Papamoa East SHAs 2/43 Chadwick Road	7	20
Urban design risk	5/152 – six Papamoa East SHAs 1/10 – Waihi Road 9/216 – Smiths Farm 4/16 – Omokoroa	9	19
Risk of poor build quality	6/152 – six Papamoa East SHAs 2/16 – Omokoroa 2/42 – Adler Drive 2/216 – Smiths Farm 4/42 – Girven Road	10	16
Proposed non-residential activities in development not needed or not suitable	8/20 – Domain Road 8/42 – Girven Road	2	16
Need for public transport	4/152 – six Papamoa East SHAs 2/42 – Adler Drive 8/216 – Smiths Farm	8	14
Reverse sensitivity from existing industrial premises	1/152 – six Papamoa East SHAs 2/43 – Chadwick Road	7	3
Possible archaeological sites & Māori heritage sites should be protected	1/152 – six Papamoa East SHAs 1/216 – Smiths Farm 1/43 – Chadwick Road	8	3
Lack of local employment	3/16 – Omokoroa 1/27 – Palm Springs extension 1/35 – Golden Sands extension	3	5
Restrictive covenants should not be allowed	1/152 – six Papamoa East SHAs 1/27 – Palm Springs extension 1/35 – Golden Sands extension	8	3
Proposed substation nearby	1/27 – Palm Springs extension 1/35 – Golden Sands extension	2	2

Table A.3: Twelve Most Common Issues Across SHAs

Issue	No. of submissions raising issue	% of submissions raising issue
Roading, congestion and safety	372	61.6
The consultation process for the establishment of SHAs	156	25.8
Building height and dwelling density	144	23.8
Pedestrian and cyclist safety	123	20.3
Loss of residential and neighbourhood character	123	20.3
Devaluation of existing property values	115	19.0
Protection of the natural environment and open spaces	109	18.0
Increased noise, loss of tranquillity	102	16.9
Unconvinced by the SHA concept	82	13.5
Lack of physical infrastructure	65	10.7
Lack of emergency evacuation routes	64	10.6
Social problems	63	10.4

Table A.4: Issues raised about only 1 SHA

Issue	SHA	No. of submissions raising issue	Total number of submissions
Access through Westridge Drive	Smiths Farm	191	216
Retain original zoning	Smiths Farm	107	216
Danger to children using school bus service	Smiths Farm	93	216
Proposal contrary to community expectations	Smiths Farm	83	216
Object to council as developer	Smiths Farm	37	216
Lack of housing and tenure diversity	Smiths Farm	4	216
Costs to developers of development and financial contributions	Omokoroa	2	16
Undermining market competition among developers	Omokoroa	2	16
Appropriation of high quality horticultural and agricultural land	Omokoroa	2	16
Reverse sensitivity from existing agricultural/horticultural activities	Omokoroa	2	16
Distortion of the market if land is not valued appropriately	Omokoroa	1	16
Lack of consideration of need for secure rental stock	Omokoroa	1	16
Lack of on-site facilities	Girven Road	7	42
Loss of outlook	Girven Road	4	42
Loss of camping ground facilities	Girven Road	2	42
Impact on privacy	Chadwick Road	4	43
Possible site contamination	Chadwick Road	1	43