

Tauranga City Council Long Term Plan submission December 2023

Submitter details:

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Submission:

Introduction

1. Recreation Aotearoa is a registered charity and the organisation responsible for providing leadership, advocacy, and professional development opportunities for those involved in the broader recreation sector. We work at an agency, industry and professional level to build capability, develop partnerships, and equip individuals and organisations with the skills they need to deliver high quality recreation experiences that engage participants.
2. Recreation Aotearoa's membership includes recreation policy makers, territorial local authorities, voluntary organisations, regional sports trusts, consultants, outdoor recreation organisations, and others involved in the delivery of recreation throughout New Zealand.
3. Our mission is enhancing wellbeing through recreation.
4. We welcome the opportunity to provide input into the Tauranga City Long Term Plan.

The value proposition of investment in Active Recreation

5. Recreation Aotearoa believes recreation is vital to New Zealand society. Recreation is not just about enjoyment. It is about being healthy, engaged, stimulated, and interacting with others. This occurs via outdoor recreation, community recreation, and within parks, aquatics, and facility-based recreation centres.
6. Recreation generates significant value for society across several of the wellbeing domains and outcomes expressed within NZ Treasury's Living Standards Framework: Health; Subjective Wellbeing; Income Consumption and Wealth; Work, Care, and Volunteering; Family and Friends; Safety.
7. The most significant benefit of recreational physical activity, surpassing others by a significant margin, is derived from health benefits, even when factoring in the costs associated with related accident and injury claims. Overall health benefits to New Zealand amount to \$9.0 billion, or \$8.4 billion after deducting the injury claims. This constitutes nearly half of the net social value generated by physical recreational activities in Aotearoa New Zealand.

8. Our population instinctively understands this. In a large survey 90 per cent of New Zealanders agreed that “by being active they are in turn maintaining a good level of health and fitness, and this helps to relieve stress.”
9. Physical inactivity is associated with loss of productivity, health costs, as well as associated costs with pain and suffering. Healthier, happier individuals are more likely to do well in other areas of their lives, whether it is in social or professional situations. This has a positive flow-on effect for communities.
10. The availability of public green spaces, including those designated for recreation, has been linked to increased mental well-being.
11. In a study conducted in New Zealand; individuals who met the global physical activity recommendations were found to have a 51% higher likelihood of experiencing healthy mental well-being.
12. Engaging in active recreations is known to reduce the prevalence of mental health conditions like depression and anxiety, as well as non-communicable diseases such as cancer, heart disease, and type 2 diabetes, ultimately enhancing life expectancy.
13. Studies indicate that involving peers and parents in developmentally suitable play provides children with the chance to cultivate social-emotional skills. These skills encompass problem-solving, collaboration, negotiation, language acquisition, and self-regulation. This contributes to the development of executive functions and facilitating effective social interaction with others. Engaging in outdoor recreation during childhood has also shown a positive association with the development of pro-environmental attitudes and behaviours in adulthood.
14. Moreover, research has demonstrated that recreation enhances social cohesion, fosters community connectedness, and strengthens community identity. A recent literature review presented compelling evidence of positive outcomes for older adults, including increased social support, the formation of friendships, and a heightened sense of integration within the community. Similarly, for young people, participating in such activities contributes to the development of friendships, a clearer sense of self among peers, a feeling of belonging, and an enhanced sense of community. 74% of New Zealanders agree

that “sport and physical activity help build vibrant and stimulating communities.”

15. Research indicates that offering fair and secure opportunities for sport and active recreation, that are inclusive of the entire community, can create connections among individuals and groups, bridging societal divides based on factors like race, class, gender, ability, or religion. 84% of New Zealanders believe “sport and physical activity bring people together and create a sense of belonging.”
16. Play serves a therapeutic and rehabilitative function in aiding tamariki to recover in the aftermath of crises, such as the impact of Covid-19 or recent events like Cyclone Gabrielle. This involves assisting children in regulating the body's stress response, providing an avenue to comprehend the events affecting them and their community, and facilitating the development or reconstruction of social connections through shared experiences. In a time where Tamariki will be subject to the increased frequency and intensity of severe weather events, play will be critical.
17. Research indicates that establishing connections with supportive individuals or groups within organised recreation settings fosters the development of various 'protective factors,' potentially mitigating antisocial behaviour. Enhancing community recreation facilities, such as local parks, has the potential to elevate participation rates and community mana, simultaneously diminishing perceived instances of antisocial behaviour within the community.
18. A thriving recreation industry can also help our nation prosper socially and economically. At last count, Play, Active Recreation and Sport contributes \$4.9 billion or 2.3% to our annual GDP, and the sector employs more than 53,000 New Zealanders.
19. Newly released findings from a Social Return on Investment study reveal that each dollar allocated to play, active recreation, and sport yields a social return of \$2.12 in New Zealand. In essence, every dollar invested in these activities results in more than a twofold social return. It's important to note that this is a conservative estimate, and the actual return, particularly for those currently excluded from opportunities for physical activity, is likely to be even higher. This submission will expand on this point with reference to the disability community and tangata whenua, separately.

20. The nation's recreation values and opportunities are fundamental to the tourism industry, and support regional development by encouraging skilled professionals and migrants to consider options in and beyond the main centres. Approximately 50% of international visitors to New Zealand participate in one form of outdoor recreation, or another.
21. Creating well-designed green spaces for physical activity in urban areas can enhance their resilience to severe weather events, such as Cyclone Gabrielle. Additionally, these green spaces contribute to cooling urban environments and promoting the health and well-being of residents. This submission will expand on this point, separately.
22. Greater understanding of these benefits and their downstream impacts, along with awareness of how Local Government can influence recreation delivery, are key to ensuring that New Zealand's recreation opportunities remain among the world's best.

Recreation through a Te Ao Māori lens – Te Whai Oranga

23. The English term "recreation" lacks a direct translation in te reo Māori. Te Kāhui Kura Māori, the Māori navigational group of Recreation Aotearoa, offered an insightful alternative, defining recreation in their strategy as "Te Whai Oranga" – the pursuit of wellbeing. Te Whai Oranga has subsequently been adopted as the title and fundamental underpinning of our organisational strategy.
24. This definition prompts a shift in approach, encouraging individuals to consider recreation not just as a pursuit of physical activity but as a holistic endeavour focused on providing wellbeing. This perspective diverges from the conventional approach of prioritising the physical aspects of recreation, emphasising that the tangible outcomes are byproducts of the overarching pursuit of Te Whai Oranga.
25. In a society struggling with disconnection and environmental challenges, the wisdom of Te Whai Oranga, a Māori approach to recreation, offers a powerful and much-needed antidote. It's not simply a collection of activities, but a holistic philosophy that weaves together well-being, environmental connection, and community spirit, creating a tapestry of resilience in the face of modern challenges.
26. Te Whai Oranga reconnects people to the Natural World. Māori recreation prioritises time spent outdoors, fostering a deep respect for

the environment. This is more than just enjoying nature; it's about understanding our place within it, becoming stewards rather than possessors. Māori knowledge systems and practices offer solutions to environmental challenges that are often missing in mainstream approaches.

27. Te Whai Oranga strengthens relationships and communities. Māori recreation is rarely a solitary endeavour. It's about shared experiences, storytelling, and strengthening bonds within whanaungatanga (extended family) and the wider community. This focus on collectivism and support networks can combat social isolation and build the resilience needed to tackle challenging issues like poverty and incarceration.
28. Te Whai Oranga promotes holistic well-being and recognises the interconnectedness of physical, mental, and spiritual health. Activities like dance, music, and storytelling are not just fun; they can be forms of emotional release, stress reduction, and spiritual connection. This aligns with the Māori Health Strategy's emphasis on "Te Oranga Whanui," the holistic well-being of the community.
29. Te Whai Oranga raises environmental awareness. Engaging with the environment through traditional practices like hunting, fishing, and gathering fosters a deep understanding of its resources and limitations. This awareness can translate into sustainable resource management and responsible environmental stewardship.
30. In our hyper-connected world, Te Whai Oranga offers a counterpoint to the constant noise and distractions. Activities like weaving or carving require focus and mindfulness, promoting inner calm and reducing stress. This resonates with the growing understanding of the detrimental effects of information-overload and the importance of mindful practices.
31. Ultimately, Te Whai Oranga is about recognising that our well-being is intrinsically linked to the well-being of our communities and the environment. It's about prioritising connection, respect, and holistic health. In a world struggling with disconnection and environmental neglect, Te Whai Oranga offers a powerful path towards healing ourselves and our planet.

32. Encompassing the kaupapa above, Recreation Aotearoa lays down a wero (challenge) to Council's to consider and invest in providing opportunities that reflect Te Ao Māori views of recreation and to encourage and support more Māori to recreate in culturally-centred ways.

Disability - Accessibility & Inclusion in Recreation

33. Recreation Aotearoa believes that the significance of enhanced access to active recreation for people with disabilities is currently underappreciated by local government. The Sport New Zealand Spotlight on Disability Report (2018) tells us that in any given week, people with disabilities participate less, and in fewer sports and recreation activities than people without disabilities across Aotearoa.

34. We also know that people with disabilities who participate in fewer sports and activities score less favourably on health and wellbeing indicators, and according to the NZ Wellbeing Statistics (2021), people with disabilities are currently faring worse (comparative to people without disabilities) across a range of wellbeing outcomes.

35. Recreation Aotearoa submits, however, that there is a strong appetite by people with disabilities to participate more, comparative to people without disability, particularly with disabled adults aged 25 and over.

36. Sport NZ's Active New Zealand data also demonstrates that the majority of the top 20 activities disabled adults want to try in the next 12 months are recreational in nature (rather than traditional sport), with a similar trend demonstrated for children and young people.

37. It's clear that individuals with disabilities often experiences even greater benefits from recreational activities than their non-disabled counterparts.

38. However, people with disabilities also have more barriers to increasing their participation than people without disability. For rangatahi for instance, a lack of nearby accessible facilities and spaces is a much stronger barrier than people without disabilities of the same age.

39. Recreation Aotearoa note that 52% of respondents with a disability/access need in the 2020 Access Survey reported there is a range of public activities and events that they would like to participate in but are currently unable to because of inaccessibility.
40. Recreation Aotearoa note that funding is a common barrier reported by Councils to enhancing the accessibility of recreation places, spaces, and opportunities. Strategically prioritising and allocating funds to enhance accessibility within existing budget investments for public recreation spaces is vital to ensure that the development and improvement of these areas actively and effectively addresses the diverse needs of people with disabilities.

The importance of Local Government to the Play, Active Recreation and Sport (PARS) Sector

41. Councils in New Zealand play a critical role in providing opportunities for New Zealanders to be physically active. Reciprocally, the realisation of various local government objectives and outcomes relies on investment in facilities, infrastructure, resources, and opportunities that promote engagement in play and active recreation.
42. It has been recently established that total funding to the play, active recreation, and sport (PARS) sector was \$4.0b, in 2022. Over 25% of this total (\$1.06b) is from local government. Local government funding of the PARS sector far exceeds that of central government and class 4 gaming grants, combined.
43. Recreation Aotearoa recognises that local government is contending with a multitude of financial challenges, including those related to water infrastructure, climate change mitigation, inflation, and the imperative to restrict rates increases. Additionally, there has been a notable decrease in the Lotto Significant Projects Fund, which traditionally supports sport and recreation infrastructure. Currently, there is no specific central government funding allocated for community sport and recreation infrastructure, and the prevailing financial conditions indicate that this issue may not be addressed in the near future.
44. However, Recreation Aotearoa submits that central and local government are jointly responsible for the well-being of New Zealanders. The establishment of a national direction and a shared framework for wellbeing lies with central government. However,

developing local wellbeing plans and allocating resources, largely sits with local government, which can foster innovation, collaboration, and localisation.

45. We have observed that regional funding forums, currently in place in many areas, play a valuable role in ensuring alignment at a regional level. Additionally, partnerships between organisations can help reduce costs, achieve economies of scale, and explore innovative approaches to provide opportunities for physical activity.
46. Local government plays a crucial role in addressing the escalating challenges posed by climate change, urbanisation, economic uncertainty, and threats to social cohesion. Prioritising physical activity can serve as a means to tackle these overarching issues. For example, effective placemaking that promotes recreation can enhance the appeal of cycling or walking, creating more attractive, safer, and inclusive spaces for social interactions. This, in turn, encourages spending time in and around local businesses and retailers. Active local communities contribute to the overall health, of individuals and families, leading to reduced strain on the healthcare system and improved well-being outcomes.
47. Recreation Aotearoa submits that transforming local government into a champion of well-being, with backing from central government, has the potential to yield tangible and positive results for both local communities and the entire country. We propose placing a distinct emphasis on recreation as an integral component of this wellbeing focus. Furthermore, we believe that recreation could serve as a proving ground for a novel partnership approach involving central and local government, as well as Māori.
48. The above-mentioned challenges and opportunities demand the efficient utilisation of funding at national, regional, and local levels. Ensuring that the available funding is employed in ways that yield the best return on investment is of paramount importance. Improved understanding and collaboration among organisations, coupled with a heightened awareness of the priorities of each organisation, can facilitate alignment and mutual support across various funding sources. Ultimately, it is local government supported by Regional Sports Trusts (RSTs) that will lead this Kaupapa.

The vital importance of urban green spaces - The PCE weighs in

49. As an independent Officer of Parliament, the Parliamentary Commissioner for the Environment (PCE) has broad powers to investigate environmental concerns and is independent of the government of the day. The Commissioner's work is directed towards the single output of independent reports and advice on environmental issues, and a mission to maintain or improve the quality of Aotearoa New Zealand's environment.
50. In March 2023, the PCE published a report titled "*Are we building harder, hotter cities? The vital importance of urban green spaces*". It has been very favourably received by professionals in a variety of sectors including town-planning, ecology, Civil Defence Management, Infrastructure, and Recreation. It makes many salient points, that Recreation Aotearoa affirms and submits to TCC for consideration.
51. In recent decades, factors such as population growth, urban sprawl, traffic congestion and loss of productive land have brought about profound transformations in New Zealand cities. In response, various changes in the realm of infrastructure, densification, re-zoning, transportation, and water services have been carried out. However, amid these changes, the significance of green space is at risk of being overlooked, or even neglected.
52. Instead of the traditional model of stand-alone homes in new peri-urban suburbs, a significant portion of the current housing construction takes the form of attached or semi-attached dwellings, such as apartments townhouses or terraced houses, within city limits. 60-80% of new residential titles in New Zealand cities since 2016 are within the pre-existing urban footprint.
53. This urban intensification reduces both the quality and quantity of urban green space. Infill housing removes gardens, lawns, trees, and soil. Increased population density impacts on the usability of existing Parks and green Spaces. In some cases, parks and green spaces are repurposed for other uses, all together. Grass berms, shrubbery, and trees adjacent to streets are reduced or removed.
54. The report goes into some detail and proves abundant examples and evidence of the important role green spaces provide. Including, temperature regulation, stormwater management, air filtration, carbon sequestration and habitat provision.

55. The PCE outlines three risks associated with this loss of green Space. The first concerns what the loss of green space might mean for the health and wellbeing of cities population and is largely covered previously in this submission. Similarly, the amenity or 'placemaking' benefits that urban green space provides is covered elsewhere in this submission and the risk of its loss is obvious.
56. Perhaps the most pertinent point the PCE made, in light of Cyclone Gabriell and the likelihood of further severe weather events, relates to stormwater management.
57. Recent flooding events highlight the risks of creating large, hardened surfaces that cannot cope the increased precipitation resulting from climate change. While one response might be to further fortify infrastructure, climate change brings additional challenges like temperature stress. As New Zealand anticipates potential heat wave crises, an urban landscape dominated by concrete and asphalt could exacerbate discomfort and, in some cases, pose risks to lives.
58. For these reasons and many more, Recreation Aotearoa submits that the Long-Term Plan pay much more regard to the provision and expansion of urban green space within Tauranga. We urge that a considered, regionally appropriate, and well-funded programme of tree planting be implemented in public spaces. This should specifically focus on areas adjacent to streets and footpaths, which are the most popular places in which physical activity takes place. We face a future in which, without adequate tree cover, it may simply be too hot to be physically active outdoors in summer.

Recreation in Tauranga

59. We acknowledge and thank Tauranga City Council as the major provider of our city's sport and recreation facilities. By investing in recreation, Tauranga City Council is helping to instil a lasting culture where active living matters. The work of Tauranga City Council makes a real difference.
60. The Tauranga City Council has a critical part to play in ensuring people continue to enjoy quality recreation opportunities. These need to be available to everyone, regardless of age, fitness level, ability, or socio-economic background.

61. Council planning needs to adopt a long-term approach that considers factors such as urbanisation, population growth, and an ageing population, to ensure recreation can continue to thrive amid change.
62. Research has found that in areas of activity decline, government and community-led interventions helped reverse the trend. When the infrastructure is in place, such as parks, playgrounds or aquatic facilities, people are more likely to be active.
63. Population growth and increased demographic diversity has and will continue to place pressure on recreational infrastructure in Tauranga.
64. We support the prioritisation of investment in walking and cycling routes in Tauranga. Investment in Active Transport infrastructure achieves the dual symbiotic benefit of easing traffic congestion and making it easier for residents to integrate healthy recreational activities into their day-to-day lives. We note that 39% of tamariki/rangitahi in the Bay of Plenty use active transport to and from school.
65. The data provided by the Sport NZ Active New Zealand survey reveals that only 28% of tamariki/rangitahi in the Bay of Plenty currently do enough physical activity to meet Ministry of Health physical activity recommendations. This is a significant decline from previous years.
66. The same survey revealed that there are significant levels of unmet demand in the Bay of Plenty region – 59% of young people and 76% of adults have a desire to do more physical activity. 18% of young people cite getting to training, games, or competitions as a barrier to increased physical activity.
67. In the Bay of Plenty 80% of young people prefer physical activities that allow them to follow their own schedule rather than someone else's. This percentage has increased significantly in recent years. Similarly, 73% of young people in the region prefer to do physical activity that is more flexible and less structured. This has increased significantly in recent years, also.
68. This is further evidenced by a decline in participation in school and club teams. In 2017, 87% of young people in the Bay of Plenty were part of a school or club sports team. This has steadily declined to 77%.

69. Additionally, the data shows that 96% of adults are active in outdoor locations or facilities. 83% of Bay of Plenty adults agree that being active in the outdoors is an important part of life.
70. Participation is largely non-competitive. We note that 61% of adults and 70% of young people participate in non-competitive activities, exclusively.
71. Recreation Aotearoa would also like to acknowledge the Tauranga City Council for their support and contribution towards the Bay of Plenty Spaces & Places plan, in partnership with Sport Bay of Plenty and adjacent Local Territorial Authorities. Committing to and adhering to such a plan avoids duplication, enhances recreational opportunities, and ensures efficiency of expenditure at a regional level.
72. We also acknowledge the significant effort and commitment that has been made by Tauranga City Council in the formulation of the Play, Active Recreation and Sport Action & Investment Plan.

Specific Comments:

73. Recreation Aotearoa commends the work of Tauranga City Council in adopting the 'Accessible Tauranga Accessibility Action and Investment Plan'. We further applaud the direct links between the Accessibility Action and Investment Plan with your Public Places Strategic Plan, Reserves and Open Space AIP and Play Active City Centre AIP.
74. Recreation Aotearoa submits its support for the ambitious improvements signalled for accessibility to recreational space and places, by way of the Community Facilities Investment Plan (CFIP).
75. Based on your population, there are an estimated 37,000 people with disabilities living in Tauranga. Considering the wider whānau impact of disability and inactivity, and the increasing rate of impairment comparative to the aging population, statistically there is a significant proportion of your community currently missing out on the irrefutable benefits of being physically active.
76. Recreation Aotearoa acknowledge Tauranga City Council as a leading Council within Aotearoa for its work in the provision of accessible and inclusive recreation programmes and places for people with disabilities. However, there is significant scope for improvement that could be delivered by way of its Long-Term Plan.

77. Recreation Aotearoa urges Tauranga City Council to allocate specific provisions within the investments of the new recreation developments specified in the LTP (Local Reserves and Walkways, Marine Park, Memorial pool, Masonic Park upgrade, Wider waterfront transformation project) to ensure they are accessible for people with disabilities.
78. We further encourage TCC to increase investment for the provision of more accessible play equipment across your network of playgrounds, and for the provision of more beach mats at additional locations within Tauranga, as part of this LTP.
79. Recreation Aotearoa submit on the importance of genuinely consulting and collaborating with people with disabilities and their whānau, and encourage Tauranga City to continue such comprehensive accessible, and inclusive consultation processes within the design, development, and upgrades of the recreation spaces specified within the LTP.
80. We further submit our support for maintaining collaboration with people with disabilities throughout the duration of such projects and warn of the risk of only consulting with end-users at the beginning of a project, or after it is too late. Maintaining ongoing input from the disability community and advisory groups at regular intervals, is an essential principle to imbed within the project developments.
81. Alongside robust processes for maintaining collaboration with people with disabilities, Recreation Aotearoa also submits its support for ensuring there are processes stipulated in policy whereby people with disabilities can notify council of any barriers to accessing recreation places, spaces, and programmes. This includes aligned procedures of how such barrier will be addressed and remediated by council.
82. Recreation Aotearoa submits its support for the wording on page 12 of the Draft LTP: “And we need to invest more in infrastructure and planning to increase our resilience to the effects of climate change, such as the extreme storms, flooding and storm surges experienced across the country,” which reflects our position on this matter.
83. Recreation Aotearoa submits its support for the \$616 million investment in enhancing community spaces and facilities, with a particular focus on Reserves, Parks, Playgrounds, aquatics facilities and pathways. We also commend and support the underpinning of this investment by the TCC PARS Action and Investment Plan. The proposed investment will improve the availability of opportunities for active recreation.

84. However, we can't help but notice and express our concern that there exist significant differences between what is documented in the PARS Action and Investment Plan and what is proposed in the LTP. Recreation Aotearoa submits that further consideration be given to incorporating much more, if not all, of the PARS Action and Investment Plan into the LTP.
85. Recreation Aotearoa cautions against deferred maintenance and upgrades of playgrounds, specifically. It is essential that planned investments in public toilets, walkways and connecting green spaces are implemented as planned. This especially the case in the western and eastern corridors that will see large increases in demand for recreation infrastructure, within the term of the LTP.
86. Recreation also submits its concern that cost escalation in undertaking these investments may be inadequately accounted for. Recent observations from around the motu, in both the PARS sector and others, have demonstrated that inflation in materials, labour and debt-servicing has placed considerable budgetary pressure on long term projects.
87. Recreation Aotearoa submits its support for the acknowledgement of urban intensification made on Page 18 of the Draft LTP. We strongly agree with the statement: "To provide for growth, we're going to need a lot more... parks and playgrounds... to be able to cater for a lot more users."
88. Recreation Aotearoa does not have strong views on the "Revitalising the city centre" section of the Draft LTP (Page 20). While several of existing projects and planned investments in the section have recreational use, we recognise and accept that much of what is planned here seeks to serve wider interests and drivers. That being said, the Masonic Park upgrade and Waterfront development are laudable investments.
89. Recreation Aotearoa submits its support for the statement on page 22 of the Draft LTP: "...it is essential to provide safe alternatives for people to get around more easily on foot, bicycle and public transport." We support the investment by Tauranga City Council in walking and cycling routes. Investment in Active Transport infrastructure achieves the dual symbiotic benefit of easing traffic congestion and making it easier for residents to integrate healthy recreational activities into their day-to-day lives.

90. Recreation Aotearoa supports the Councils commitment to investment in active transport infrastructure. Recreation Aotearoa has long supported Active Transport initiatives across the motu. As such, we support proposed investments such as the multimodal upgrades, Accessible Streets and the Grenada Steet Cycleway.
91. Recreation Aotearoa notes that these projects support increased participation in walking, cycling, scooting, and skating – forms of physical activity that the Active NZ survey identified as leading preferences for residents of the Bay of Plenty region.
92. To the extent to which SmartTrip pricing incentivises and funds Active Transport, we are supportive. However, the cost-benefit analysis of this proposal needs to include its impact on participation in physical activity, particularly among tamariki/rangitahi and high-deprivation communities.
93. We note that Sport BOP has undertaken a Parent Survey with caregivers in the region. Responses in the Western Bay indicated that logistics, travel, and cost were by far the three most salient barriers to enabling their children to play sport.
94. The SmartTrip proposal would impact locations such as Blake Park, Bay Park, Gordon Spratt, and Tauranga Domain. We submit our concern that adding travel costs to the barriers that participants already face, is of huge concern.
95. Recreation Aotearoa recognises and supports that Sustainability and Resilience section of the Draft LTP is underpinned by the Nature and Biodiversity plan and the Climate plan. Specifically, we commend the plan to plant more trees alongside built utility infrastructure with an aim of increasing native vegetation from 3% to 10% across the city. Similarly, the plan to identify and increase 'green corridors' has our support, to the extent to which it improves the quality of the user experience within green spaces.
96. Recreation Aotearoa does not have a view on the implementation of a new industrial rating category, other than the hope that a large and more diversified revenue stream may support further investment in active recreation.
97. Recreation Aotearoa supports the proposed minor changes to the Private pool inspections regime.

98. Recreation Aotearoa recognises that the community stadium proposal is designated primarily as an events precinct to bolster city centre revitalisation, with a secondary emphasis on community sports and physical activity. If the community stadium is progressed, recreation Aotearoa supports Staged Implementation.
99. Recreation opposes a single-stage approach. Its implicit Capital costs of \$260m to \$315m, are unaffordable and would significantly impact Tauranga's debt and operating budgets in and beyond the planning period. This proposal offers limited benefits for active recreation or physical activity, more widely. It is likely to have adverse effects on much needed investments in active recreation facilities and spaces.
100. We note that staged implementation still implies a commitment of \$81m and opportunity costs, both in terms of capital and operational expenditure. We submit that this would be far better allocated toward the unfunded play and active recreation infrastructure identified in the PARS Action and Investment Plan (See points 82 and 100).
101. As noted in point 82 above, we have significant concerns that numerous and material aspects of the PARS Action and Investment Plan have been excluded from the Draft LTP. This is made referenced on page 66, where it states: "we have significantly boosted investment to implement the Play, Active Recreation and Sport Action and Investment Plan..... However, some investment will sit outside of the LTP to ensure our overall programme is affordable and deliverable."
102. This Section goes on to list a series of investments in active recreation infrastructure that we view as regrettable, including in Parks and Reserves.
103. Recreation Aotearoa submits its support for the investment in Play by Tauranga City Council. It is essential that investment in Play infrastructure is applied to the growing population in new urban developments and under-active demographics in high deprivation communities. Recreation Aotearoa notes that co-design kaupapa for Play infrastructure often results in a desirable bias towards less structured and informal modes of play.
104. Recreation Aotearoa cautions Tauranga City Council of a predictable lag-effect of participant uptake in the utilisation of new recreational facilities. Many forms of recreation have suffered a loss of participant numbers and organisational capability after recent challenges. Recreation Aotearoa urges Tauranga City Council to be patient with

regard to how quickly and fully new facilities are utilised by different recreational groups.

105. Additionally, we submit that rapid changes in demographics, participation trends and technology mean that a 'build it and they will come' approach doesn't always work. Simply building infrastructure is not enough. Recreational assets need to be activated and programmed to make them more appealing and to break down barriers for the hard-to-reach areas of the community.