

Submission # 11

6 September 2022

Chief Executive
Bay of Plenty Regional Council

Proposed Change 6 (NPS-UD) to the Bay of Plenty Regional Policy Statement

Tēnā koe e Rangatira

Bell Road Limited Partnership has made a submission on Plan Change 6 (NPS-UD) to the Bay of Plenty Regional Policy Statement.

The Bell Road Limited Partnership is a joint venture between Zariba Holdings and Bluehaven Group, formed to acquire, investigate and plan for the urban development of some 350ha at Bell Road, Pāpāmoa.

A preliminary master plan has been developed, providing a mixed-used spatial planning assessment, and work is currently underway on natural hazard and servicing assessments, including stormwater modelling.

We note that NPS-UD strongly emphasises placemaking in and around known sub-regional centres to support strong multi-modal connections, more compact forms of housing, with community spaces, public services such as medical, and other mixed land-uses & businesses.

The proposed Bell Road development has the potential to enable large scale housing with 3,000+ residential dwellings, achieving at least 25 residential units/ha, with a mixed typology of compact housing including high density, medium density, terraced and affordable/leasehold housing options.

This development is being planned to also provide for:

- Public transport connection to Wairakei Urban Growth Area, including The Sands Town Centre, and linking into local and arterial loop routes to Te Puke, Paengaroa and wider WBOP networks.
- Cycling and pedestrian networks to Wairakei, and links to Te Puke and Paengaroa.
- Comprehensively planned accessible network of neighbourhood and local retail centres, parks, and a new primary school;
- Proximity to sub-regional community facilities proposed in Wairakei and Te Tumu, including aquatic, indoor sports, schools, sports fields, parks & reserves.

The above initiatives support regional network transportation efficiencies and decarbonisation through self-containment and multi-modal network.

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Although various submissions have been made to SmartGrowth, WBOP and TCC previously, this subject land is *out of sequence* with current plans formulated by Councils in the Western Bay of Plenty sub region.

The development, if it proceeds beyond the investigation stage, will require consideration under proposed Plan Change 6.

In broad terms, we support the proposed Plan Change 6.

Our submission mainly concerns policy *UG7A Providing for unanticipated or out-of-sequence urban growth – urban environments*. Our key issues are:

- The criteria should refer to the FDS and RMA plans, not the HBA. The HBA is not a plan. It is a tool used to inform the FDS alongside other inputs and does not deliver capacity on its own. It is a technical analysis that is not subject to formal consultation nor decision making under the RMA or LGA.
- The criteria as drafted does not give adequate consideration to the opportunities within a development area to create a well-functioning urban environment.
- We also seek that that Policy UG 18B: Managing rural development and protecting versatile land explain that the use of versatile land for urban development may be justified where there are limited alternatives available and efficient use (i.e. high intensity use) is made of that land to achieve a well-functioning urban environment.
- Ensuring the integration of land use and transportation acknowledges the benefits of proximity to existing and proposed sub-regional centres.

Ngā mihi,



Nathan York



Submission Form

Send your submission to reach us by
4 pm on Tuesday 6 September 2022

Submission Number

Office use only

Post: The Chief Executive Bay of Plenty Regional Council PO Box 364 Whakatāne 3158	or Fax: 0800 884 882	or email: rpschange6@boprc.govt.nz
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Submitter: Bell Road Partnership Ltd

This is a submission on **Proposed Change 6 (NPS-UD) to the Bay of Plenty Regional Policy Statement**

- 1 I could not gain an advantage in trade competition through this submission.
- 2 The details of my submission are in the attached table.
- 3 I wish to be heard in support of my submission. [*select one]
- 4 If others make a similar submission, I will consider presenting a joint case with them at a hearing.

[Signature of person making submission or person authorised to sign on behalf of person making submission.]

[NOTE: A signature is **not** required if you make your submission by electronic means.]

6 September 2022

Date

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The specific provisions of the proposal that my submission relates to are:

Page No	Reference	Support/Oppose	Decision Sought	Reasons
6	2.8.1 Regionally significant urban and rural growth management issues	Support	Deletion of “Adversely impact on the residential character and amenity values of existing urban areas”.	The reference to intensive urban development having the potential to ‘ <i>adversely impact on the residential character and amenity values of existing urban areas</i> ’ is inconsistent with the NPS policy direction and is inappropriate.
6	2.8.1 Regionally significant urban and rural growth management issues	Oppose	Recognise potential adverse effects of intensive urban development on infrastructure in addition to roads including: <ul style="list-style-type: none"> <u>Increased demand for intensive residential development may overload three waters, other network and social infrastructure if not undertaken with well-planned and appropriately funded network improvements.</u> 	A potential effect of intensification is to place increased demand on infrastructure in addition to roads which may become overloaded if not properly managed.
23	Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments	Oppose	Amend to refer to the FDS and RMA Plans as the key documents that anticipate and sequence urban development with the following amendments to criterion (a): <p><i>The development is of large enough scale to contribute to meeting demand for additional urban land identified through the HBA for the area FDS or RMA Plans, including meeting housing bottom lines or meeting needs for specific housing typologies or price points, or business types. Where there is no HBA, there is evidence that there is a need for additional urban land, and</i></p>	The FDS and RMA Plans are the strategic planning documents recognised in the NPS UD. The criterion should not refer to the HBA. The HBA is not a plan. It is a tool used to inform the FDS alongside other inputs and does not deliver capacity on its own. It is a technical analysis that is not subject to formal consultation nor decision making under the RMA or LGA. The Explanation does not refer to the HBA, but to the FDS and other plans.
23	Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments	Oppose	Amend criterion (d) <p><i>The development is located with will provide good accessibility between housing, employment, community and other services and open space, and</i></p>	The criterion as drafted does not clearly address accessibility <u>within</u> a development area, which will also contribute significantly to a well-functioning urban environment. Large scale development can provide self-sustaining local services with significant long-term benefits to

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				<p>liveability and greenhouse gas emissions that will contribute to well-functioning urban environment</p> <p>This includes provision of walkable local commercial, social and community service, schools, open space, and access to public and active transport modes.</p>
			<p>Amend (e) as follows: Required Development infrastructure can be provided efficiently, including the delivery, funding and financing of infrastructure. without materially reducing the benefits of other existing or planned development infrastructure, or undermining committed development infrastructure investment.</p>	<p>Unanticipated or out-of-sequence development may affect planned development and infrastructure, however this is an acceptable position where the benefits outweigh the costs.</p> <p>The proposed policy has a high threshold (i.e. ‘...without materially reducing the benefits of other existing or planned development...’ and would act to severely limit the opportunities for alternative growth proposals and is inconsistent with the NPS-UD).</p>
23	Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments	Oppose	<p>Amend the Explanation:</p> <p><i>Unanticipated development is urban development (subdivision, use and development) that is not identified as being provided for in an adopted local authority Future Development Strategy, growth strategy, or RMA plan, Long Term Plan, or 30-year infrastructure strategy. Out of sequence development is development that is not consistent with the development sequence set out in one or more of those documents.</i></p>	<p>The explanation lists other plans as ‘or relevant plan or growth strategy, RMA planning document, Long Term Plan, or 30-year infrastructure strategy’.</p> <p>Referring to plans other than the FDS and RMA plans is inappropriate, being inconsistent with the NPS UD, and will create undesirable uncertainty. These other documents also may not always be aligned, or subject to the same rigour of analysis, community engagement, or decision making.</p>
28	Policy UG 13B: Promoting the integration of land use and transportation	Oppose	<p>Amend Policy 13B as follows:</p> <p><i>Proximity to <u>existing and proposed</u> commercial centres, places of employment, community services and <u>areas of high amenity are considered in transport planning to that support higher density development and compact form.</u></i></p>	<p>Changes are required to improve clarity and to better align with the preamble text.</p>

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30	Policy UG 18B: Managing rural development and protecting versatile land	Support	<p>The qualification that the rural land resource is for <i>urban development that has satisfied the criteria in UG 7A</i> should be retained.</p> <p>Add the following (or similar) to the explanation:</p> <p><u><i>Use of versatile land for urban development may be justified where there are limited alternatives available and efficient use is made of that land to achieve a well-functioning urban environment.</i></u></p>	The explanation as drafted does not address the reasons for allowing use of versatile land for urban development.
37	Method 18: Structure plans for land use changes	Oppose	Replace the term “Structure plans” with “Spatial plans”	The term ‘Structure plan’ is now more associated with infrastructure planning rather than the broad scope of matters referred to in Method 18.