



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: Classic Developments Limited

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

- 1 I ~~could~~/**could not*** gain an advantage in trade competition through this submission. [*select one]
- 2 I ~~am~~/**am not*** directly affected by an effect of the subject matter of the submission that [*select one]
 - (a) adversely affects the environment, and
 - (b) does not relate to trade competition or the effects of trade competition

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

[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.]*

06/9/2022

Date

Contact person: *[Name and Designation if applicable]*

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Submissions contain personal information within the meaning of the Privacy Act 2020. By taking part in this public submission process, submitters agree to any personal information (including names and contact details) in their submission being made available to the public and published on our website, and for the information collected to be held in accordance with our Privacy Statement available at www.boprc.govt.nz.

The specific provisions of the proposal that the Classic Developments Limited submission relates to are as follows:

Page No	Reference	Support/Oppose	Decision Sought	Reasons
6	2.8.1 Regionally significant urban and rural growth management issues 9. Intensive Urban Development	Support	We support the deletion of the provisions relating to adverse impacts on residential character and amenity	This is consistent with Policy 6 of the NPS-UD which acknowledges that planned urban built form may involve significant changes to an area, and that those changes (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and (ii) are not, of themselves, an adverse effect The current wording of the RPS is inconsistent with the NPS-UD and is therefore inappropriate
6	2.8.1 Regionally significant urban and rural growth management issues 9. Intensive Urban Development	Support	We support the amendment which recognises the need for well planned transport improvements to be provided with growth	Well planned transport improvements are necessary to achieve successful intensification outcomes.
22	Policy UGA: Efficient use of land and infrastructure for urban growth and development. Explanation	Oppose in part	Amend the explanation for the policy statement Large-scale urban growth (greenfield and brownfield) must be subject to detailed structure planning to address, among other matters, high level urban design, and provisions and funding of network infrastructure	The amendment clarifies the appropriate scale of urban design input that is required as part of the preparation of a structure plan

Submission # 13

40	Appendix A – Definitions	Oppose	<p>The plan change refers throughout to “urban environment” but contains no definition of an urban environment. We seek that the following definition be included:</p> <p>Urban Environment: any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:</p> <p>(a) is, or is intended to be, predominantly urban in character; and</p> <p>(b) is, or is intended to be, part of a housing and labour market of at least 10,000 people.</p>	A definition is required to be incorporated to clarify the reference to “urban Environment”
23	<p>Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments</p> <p>(a) Housing bottom lines</p>	Oppose in part	<p>amendments to criterion (a) are sought as follows:</p> <p><i>The development is of large enough a scale to contribute to meeting demand for additional urban land identified through the HBA for the area FDS or RMA Plans, <u>Future Development Strategy including meeting housing bottom lines or meeting needs for specific housing typologies or price points, or business types. Where there is no HBA, FDS Future Development Strategy there is evidence that there is a need for additional urban land, and</u></i></p> <p>Explanation</p> <p>Remove references to documents (other than the Future Development Strategy from the explanations for the policy).</p>	<p>The policy incorrectly relies on Housing and Business Capacity Assessments to determine the need for additional urban land. The approach is contrary to the NPS-UD which relies on the Future Development Strategy as the method.</p>
23	<p>Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments</p> <p>(b) and (c)</p>	Oppose	<p>Delete the area reference in (b) of the policy as follows:</p> <p>(5 hectares or more)</p> <p>Amend (c) in the policy as follows:</p> <p>for all other urban environments</p>	There is no reason why smaller scale developments cannot be considered under the policy. The exclusion of smaller sites is contrary to the NPS-UD. Such sites are numerous throughout the sub region and will play an important role in providing land for housing and business use.
23	<p>Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments</p> <p>(d)</p>	Oppose in part	<p>Amend (d) as follows</p> <p><i>The development is located with <u>provides good accessibility between housing, employment, community and other services and open space, and</u></i></p>	The provision should provide for and acknowledge the contribution of local services and amenities which are internal rather than external to a development site

	<p>Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments (f)</p>	<p>Oppose</p>	<p>Amend (f) 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. Remove the following from the explanation: 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, 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. The criteria apply to private plan changes, submissions on plan changes and submissions on plan reviews seeking additional greenfield or brownfield urban development. Plan changes and plan reviews initiated by local authorities do not fall within this policy, as they are anticipated.</p>	<p>There is the need to ensure an adequate pipeline and supply of future land for urban development which has been a failing of growth management in the sub-region. Future development may impact on planned development and infrastructure, however benefits may outweigh costs, and in some instances the benefits (including efficiencies) may be significant. Such development should not be excluded under the policy which acts to severely limit the opportunities for growth and is contrary to the NPS-UD.</p>
<p>28</p>	<p>Policy UG 14B: Restricting urban activities outside urban environments and explanation</p>	<p>Oppose</p>	<p>We seek the following changes to UG14B and its supporting explanation: Restrict the Manage growth of urban activities located outside urban environments unless it can be demonstrated to ensure that sound resource management principles are achieved, including: (a) The efficient development and use of the finite land resource, and (b) Providing for the efficient, planned and coordinated use and development of infrastructure, and (c) there are benefits and efficiencies of expanding existing settlements/towns</p> <p>Explanation While areas outside urban environments have not been and are unlikely to face the same growth pressures, some urban growth</p>	<p>There may be circumstances where expansions to existing settlements (such as Paengaroa and parts of Te Puke) are appropriate but where currently such settlements are not serviced via reticulated services. Provisions need to be included in plan change 6 to ensure that such settlements are not precluded from future consideration for urban growth.</p>

			<p>pressures can be expected. Outside of urban environments and urban growth that forms part of an urban environment, new urban areas (or urban zoning) is not desirable as it can create a sporadic settlement pattern and result in an inefficient use of natural and physical resources. There are however, some limited circumstances where such proposals could be acceptable such as extensions to existing towns that have reticulated water and wastewater services. Therefore, the same overarching growth principles of the National Policy Statement on Urban Development (2020) should apply in other areas to ensure proposals result in an efficient use of land and resources. For the avoidance of doubt, this policy does not enable development in villages and settlements that do not have reticulated water and wastewater services.</p>	
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