

Royal Forest & Bird Protection Society of New Zealand Inc

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**Submission from Royal Forest & Bird Protection Society of New Zealand Inc (Forest & Bird) to
Proposed Change 6 (NPS-Urban Development) to the Bay of Plenty Regional Policy Statement (PC6)**

This submission is on behalf of all of the Bay of Plenty Branches. The Society would like to be heard.

Introduction

Forest & Bird was established in 1923 and is New Zealand's largest independent conservation organisation with over 80,000 members and supporters.

The key matters of concern to Forest & Bird relate to the protection of ecological values, particularly those associated with indigenous biodiversity, wetlands and the coastal environment, and climate change.

This plan change is relevant to core aspects of the Society's strategic plan:

- Climate Centred - Ensuring our country does everything we can to keep the climate safe for all life on Earth. Mitigating the impact of climate change will be at the heart of everything we do.
- An Economy that supports Nature - Encouraging communities to appreciate nature for its intrinsic and life-giving values which recognise that our long-term economy is dependent on a healthy environment.

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- Vibrant Landscapes - Stable, healthy ecosystems full of native animals and plants

Submissions relating to the whole of the Plan Change:

1. Forest and Bird supports intensification of urban environments to reduce greenhouse gas emissions from commuting, other transport emissions, and provisions for adaptation to the effects of climate change.
2. Forest and Bird is concerned that under this proposed plan change urban environments may develop and/or extend into rural areas where significant natural areas and landscapes may be threatened by human settlements through the introduction of domestic pets that are predators on indigenous fauna and the spread of pest plants from home gardens.
3. The Plan Change should be amended to incorporate relevant aspects of the National Policy Statement on Indigenous Biodiversity if that is notified before this plan change process is complete.
4. Forest and Bird submits that consequential changes arising from amendments sought are likely to be necessary.

Specific Submission Points

PC6 shown in italics and Forest and Bird proposed amendments shown underlined.

Page	Reference	Support/ Oppose	Decision Sought	Reasons
12, 18 & 22	<i>Deletion of Policy UG 5A: Establishing urban Limits - western Bay of Plenty sub-region and associated maps and Appendices.</i>	Oppose	Reinstate or otherwise amend to discourage currently unplanned urban development on greenfield sites. Amendments required to reverse this deletion may require consequential changes to other policies where reference to urban limits has been made e.g including but not limited to Methods 14 and 16.	If there are no urban limits, urban environments are more likely to develop closer to areas of significant indigenous biodiversity and threaten their integrity and function. Urban development results in an increase in domestic pets and garden plants which are a threat to biodiversity. The deleted explanation contains many aspects of the reasoning of not allowing ad hoc greenfield development including certainty for non-urban uses, and that such changes will not be made lightly.
11, 18 & 22	Policy UG 6A: <i>Efficient use of land and infrastructure servicing for urban growth and</i>	Support	Retain	Forest & Bird supports infrastructure servicing because a lack of infrastructure servicing is inefficient and may contribute to adverse environmental effects.

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	<i>development</i>			
7, 11, 18, 20, 23, 24, 25	Policy UG 7A <i>Providing for unanticipated or out-of-sequence urban growth - urban environments</i>	Forest & Bird opposes this policy in its current form.	Amend Policy UG 7A in Table 8 (pages 7 & 11 under Objectives 23 & 25), and in Table 11 (page 18) and on page 23, as follows: (Note that there is a grammatical flaw in the heading paragraph) <i>Private plan changes, submissions on plan changes, or submissions on plan reviews providing for development of urban environments and urban growth that forms part of an urban environment, that is unanticipated or out-of-sequence, will <u>must</u> add significantly to development</i>	The intention of this policy is to provide for growth in housing and supporting infrastructure. A potential adverse effect of the current wording of this policy is an increase in the number of predators emanating from urban environments. The Explanation for Policy UG 7x <i>"2 Reduced environmental impacts from reduced need for urban expansion"</i> acknowledges that urban expansion has adverse environmental impacts.

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			<p><i>capacity based on the extent to which the proposed development satisfies the following criteria:</i></p> <p>.....</p> <p>Add another sub-paragraph</p> <p><u>(g) the development will not increase the risk of adverse effects on the coastal environment, rural land and significant natural areas and landscapes.</u></p> <p>In Table 8 (pages 7 & 11) after “Method 18” for Policy UG 7A, add:</p> <p><i>Method 49: Improve biodiversity values of open spaces.</i></p>	

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			<p><i>Method 64: Encourage agencies and landowners to protect key sites</i></p> <p><u>New Method 79 (or alternatively amend Method 64)</u></p> <p><u>Encourage agencies and landowners to restrict the holding of domestic cats and dogs where in close proximity to wildlife habitat and significant natural areas.</u></p> <p>On page 24, change the</p> <p><i>Table reference: Objective 23 and 25, Methods 1 and 3-18 Methods 1, 3, 18, 49, 64, and 79.</i></p>	
24	<p>Policy UG 7A</p> <p>Explanation para 7</p> <p><i>Where urban</i></p>	Oppose	Add to paragraph 10 of the Explanation or include a separate paragraph to the	Avoiding predation and spread of plant pests in natural areas is not an unnecessary constraint. It is part of integrated and judicious

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	<p><i>development satisfies the criteria, local authorities must respond by removing unnecessary constraints and focusing resources and attention to expedite decision making processes.</i></p>		<p>effect that urban development can have significant adverse effects on indigenous biodiversity, the coastal environment and natural landscapes.</p>	<p>decision-making and does not constitute focusing resources and attention away from expediting the decision-making process.</p>
24	<p>Policy UG 7A <i>Explanation para 8</i> <i>These criteria do not negate the requirement for urban development to give effect to the</i></p>	<p>Support in part</p>	<p>See previous submission point.</p>	<p>Forest & Bird supports giving effect to the RPS as a whole, including all other relevant objectives and policies, satisfying other criteria, and implementing relevant methods. This proposed explanation should be augmented by other amendments sought including the relief sought for para 7.</p>

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	<p><i>RPS as a whole, including all other relevant objectives and policies, satisfying other criteria, and implementing relevant methods.</i></p>			
24	<p>Policy UG 7A <i>Explanation para 10 Climate change and natural hazards can have significant impacts on the region's urban growth aspirations and on people, property and</i></p>	Support.	Retain	<p>Forest & Bird supports consideration being given to whether a site is significantly constrained by the effects of climate change or natural hazards because climate change and natural hazards can have significant adverse effects.</p>

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	<p><i>infrastructure. Prior to 'live zoning' land for structure planning and development purposes, consideration is to be given to whether a site is significantly con-strained by the effects of climate change or natural hazards.</i></p>			
24	<p>Policy UG 7A <i>Explanation para 11</i> <i>For avoidance of doubt, giving effect to Policy UG 7A does</i></p>	Support		<p>Forest & Bird supports this wording because inadequate consideration of risk, hazards and infrastructure will have significant adverse effects.</p>

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	<p><i>not negate the requirement to prepare a risk assessment (Policy NH 9B) and achieve a low level of risk as required by Policy NH 4B on the development site without increasing risk outside of the development site. Further consideration of hazards and infrastructure related matters are set out in RPS</i></p>			

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	<i>Policies IR 5B, UG 10B and UG 11B.</i>			
25	<i>Policy UG 7Ax</i> Explanation	Support	Retain references to giving effect to the RPS as a whole.	Forest & Bird acknowledges these benefits but they must be augmented by giving effect to the RPS as a whole and giving consideration to whether a site is significantly constrained by the effects of climate change, natural hazards or effects on indigenous biodiversity.
25	<i>Policy UG 7Ax</i> <i>Explanation Para 2</i> <i>The intention of this policy is to encourage increased density, and compact urban form, but not to set density targets for areas or locations. Density</i>	Forest & Bird opposes this part of the explanation in its current form.	Change the last sentence of this explanation by adding the underlined words as follows: <i>(including infrastructure, and transport systems, <u>and significant natural areas</u>).</i>	Forest & Bird supports giving effect to the RPS as a whole and giving consideration to whether a site is significantly constrained by the potential adverse effects on wildlife and potential adverse effects on significant natural areas.

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	<p><i>targets and provisions are best set in district or city plans relative to local opportunities and constraints (including infrastructure and transport systems).</i></p>			
25	<p><u>Policy UG 7Ax</u> Explanation Last sentence <i>Territorial authorities may develop spatial plans to assist achieving high quality urban design and outcomes.</i></p>	Support in part.	See submissions above. Change the last sentence by replacing the word 'may' with the word 'should'.	The use of spatial plans in providing for increased housing density and development is best practice.

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7, 18 & 26	<i>Policy UG 9B: Co-ordinating new urban development with infrastructure</i>	Support	Retain	Forest & Bird supports co-ordinating urban development with infrastructure because a lack thereof contributes to adverse effects on the environment including effects of climate change.
9, 18, 28	<i>Policy UG 13B: Promoting the integration of land use and transportation</i>	Support	Retain	Forest & Bird supports co-ordinating urban development with land transport planning because a lack thereof contributes to adverse effects on the environment including effects of climate change.
10, 12, 18 & 28	<i>UG 14B Restricting urban activities outside <u>urban environments</u> the urban limits western Bay of Plenty sub-region</i>	Support in part	Either define “urban activities” to refer to additions to existing settlements or reword: Restrict the growth of urban activities <u>residential areas</u> located outside urban environments <u>including lifestyle developments</u> unless	Policy UG 14B is the most important policy for Urban Growth as without it there is a high likelihood of urban sprawl. We are aware that a lack of clear definitions in some district plans is allowing interpretations that lifestyle blocks and rural-residential development are provided for in rural areas where that was not intended in those plans.

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			<p>it can be demonstrated that sound resource management principles are achieved, including:</p> <p>(a) The efficient development and use of the finite land resource, and</p> <p>(b) Providing for the efficient, planned and co-ordinated use and development of infrastructure.</p>	<p>We understand that “UB 14B” should state “UG 14B”.</p>
<p>12, 18, 31</p>	<p><i>Policy UG 19B: Providing for rural lifestyle activities</i></p>	<p>Support in part</p>	<p>Require that the productive potential of <u>rural land</u>, <u>particularly</u> versatile land, is not compromised.</p>	<p>There is an inconsistency between the policy and the Explanation. Rural land that does not meet the definition of versatile land (Class 1-3), can nevertheless be highly productive e.g. the Opotiki Tablelands and Paerata Ridge kiwifruit production area which are Class 4.</p>