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The Chief Executive
Bay of Plenty Regional Council
Via email: rpschange6@boprc.govt.nz

Proposed Plan Change 6 (NPS – Urban Development)

This is a submission by Mitre 10 Holdings Limited (Mitre 10) on Proposed Plan Change 6 (NPS-UD) (**PC6**) to the Bay of Plenty Regional Policy Statement. The contact details for the submitter are provided as follows:

Aurecon New Zealand Limited on behalf of Mitre 10 Holdings Limited
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Mitre 10 could not gain an advantage in trade competition through this submission, nor does this submission relate to trade competition of the effects of trade competition.

This submission is made in **Support** of PC6.

Mitre 10 does wish to be heard in support of its submission.

Mitre 10 would consider presenting a joint case on any complementary submission that seeks to be heard.

Background information

Mitre 10 has a long-standing history in Tauranga and the wider Bay of Plenty with a Mitre 10 Mega located on Cameron Road, Gate Pa, and a smaller Mitre 10 located at the Papamoa Plaza. Mitre 10 has provided significantly to the Bay of Plenty economy through employment opportunities and contributing to the local building / construction sector. Due to the nature of the activity, Mitre 10 has found difficulty finding appropriately located and sized pieces of land to situate a new Mitre 10 Mega to serve the needs of the community.

Policy 1(b) of the NPS-UD recognises that planning decisions need to contribute to a well-function urban environment which includes a variety of sites that are suitable for different business sectors in terms of location and site size. Policy 2 of the NPS-UD instructs Tier 1 authorities (including Tauranga) to provide sufficient development capacity to meet expected demand for both housing and business land over the short, medium, and long term. It is anticipated that the development of a site for the purpose of a Mitre 10 Mega will meet the current and future demands of Papamoa and Mount Maunganui.

Mitre 10 owns 160 Domain Road (Lot 1 DP 528542 – the Site) (**Figure 1**), located to the west of Domain Road and north of the Tauranga Eastern Link (State Highway 2). Mitre 10's landholding is currently zoned Rural under the Tauranga City Plan (TCP). The Site has a total area of approximately 14 hectares, is generally flat in nature and is currently used for grazing purposes.



Figure 1: Aerial showing extent of Mitre 10 land (Source: Grip)

In terms of the surrounding environment, the land to the north and east of the Site is a mixture of rural residential and low-density residential activities, generally consistent with the area’s underlying zone. Domain Road is identified as a Secondary Arterial Road under the TCP and provides a link between State Highway 2 to the south, and the commercial area, known as Papamoa Plaza to the north, which contains the existing Mitre 10 Papamoa. Other amenities in the area include a medical centre, early childhood education facilities, a primary school, and Papamoa College to the east. The presence of these amenities demonstrate that the surrounding environment is well established and could accommodate future development of the Site and its surroundings.

Under the operative RPS, the Site sits outside the extent of the Urban Limit (Figure 2).



Figure 2: Aerial showing Mitre 10 land and operative urban limit (Source: BOPRC RPS)

Application of PC6 to Mitre 10 Holdings Limited

PC6 proposes a number of amendments that will increase the ability for responsive urban development across the Bay of Plenty and addresses the requirements of the NPS-UD, in particular:

- The responsive planning requirements.
- The intensification planning requirements.
- The requirement to take into account the principles of Te Tiriti o Waitangi.

Mitre 10 **supports** the proposal to include provisions that support development outside the extent of the historic urban limits within the Bay of Plenty Region, in particular recognising the need for unanticipated or out-of-sequence urban growth as per Policy 8 of the NPS-UD.

This submission relates to PC6 in its entirety, including the following provisions outlined in **Table 1** below.

Table 1: Specific provisions of PC6

Page No	Reference	Support/Oppose	Relief Sought	Reasons
7	Objective 23	Support	Adopt proposed amendments to Objective 23 as notified.	Objective 23 recognises the need to enable and provide for unanticipated development that is responsive to the needs of the community. Mitre 10 support the recognition of the need for increased urban development within urban environments that is not restricted by urban limits or growth management areas.
9	Objective 25	Support	Adopt proposed amendments to Objective 25 as notified.	Ensuring that urban subdivision and development can occur in a responsive manner. However, further clarity is sought regarding the inclusion of ' <i>and other development entities</i> ' as identified in Objective 25 of the RPS.
22	Policy UG 5A	Support	Delete Policy UG 5A as notified.	The imposition of urban limits is an inflexible method that is inconsistent with the NPS-UD. The deletion of Policy UG 5A, and related amendments proposed in PC6, will ensure the RPS gives effect to the NPS-UD as required by section 62(3) RMA. Mitre 10 supports the removal of the establishment of urban limits as provided in Appendix E of the RPS. Removing the urban limits from the Bay of Plenty Region will allow responsive urban development across the Bay of Plenty and achieve the directive of the NPS-UD.

22	Policy UG 6A	Support	Adopt proposed amendments to Policy UG 6A as notified.	The proposed amendments to Policy UG 6A give effect to the NPS-UD in terms of Objective 4 and Policy 1. Further flexibility and provision must be provided to ensure that development is enabled in the Bay of Plenty to allow for responsive urban growth and increased development capacity.
23	Policy UG 7A	Support	Adopt proposed Policy UG 7A as notified.	Mitre 10 supports the inclusion of Policy UG 7A recognising the need for unanticipated or out-of-sequence urban growth. The proposed policy under PC6 is seen to achieve Policy 8 of the NPS-UD and provide for development that is unanticipated by RMA planning documents. In particular, Mitre 10 support the inclusion of Policy UG 7A (b) defining the size of a 'large scale' development being greater than 5ha.
28-29	Policy UG 14B	Support	Adopt proposed Policy UG 14B as notified.	Policy UG 14B is considered consistent with the NPS-UD. In particular, recognising that urban development extensions to existing towns that have reticulated water and wastewater will increase the development capacity and achieve Policy 8 of the NPS-UD. Allowing for new urban areas (or urban zoning) outside the urban environments within appropriate areas will ensure the efficient use of land and will be aligned with Policy 6 and 8 of the NPS-UD.
41	Appendix C	Support	Delete Appendix C, as notified.	Appendix C (Indicative growth area timing and business land provision) is inconsistent with the NPS-UD. The removal of Appendix C will ensure the RPS gives effect to the NPS-UD as required by section 62(3) RMA.
42	Appendix D	Support	Delete Appendix D, as notified.	Appendix D (Indicative growth area sequencing) is inconsistent with the NPS-UD. The removal of Appendix D will ensure the RPS gives effect to the NPS-UD as required by section 62(3) RMA.
45-57	Appendix E	Support	Delete Appendix E as notified.	Appendix E (Management and Growth areas for the western Bay of Plenty) is inconsistent with the NPS-UD. The removal of Appendix E will ensure the RPS gives effect to the NPS-UD as required by section 62(3) RMA.

Summary

Mitre 10 supports PC6 insofar as it will ensure the RPS gives effect to the NPS-UD, as required by section 62(3) RMA.

The NPS-UD requires that additional flexibility be provided within the BOPRC RPS, through the adoption of provisions that will deliver sufficient, feasible, plan-enabled commercial, residential and mixed-use development beyond the confines of the existing urban environment. It is important that the RPS is responsive to the variability of urban development capacity within the lifetime of the RPS and district plans, to ensure the needs of the community are reliably and sustainably met through the well-functioning urban environments.

Yours sincerely

A handwritten signature in black ink, appearing to read "Andrew Gysberts", with a large, sweeping flourish at the end.

Andrew Gysberts
Senior Consultant, Environment and Planning, Aurecon
(on behalf of Mitre 10 Holdings Limited)