



## Submission Form

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

Submission Number  
*Office use only*

<b>Post:</b> The Chief Executive Bay of Plenty Regional Council PO Box 364 Whakatāne 3158	<b>or Fax:</b> 0800 884 882	<b>or email:</b> rpschange6@boprc.govt.nz
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**Submitter:** Newman Group 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]*

Aaron Collier, Collier Consultants Limited

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c/- PO Box 14371, Tauranga Mail Centre, Tauranga 3143. Attention: Aaron Collier

*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](http://www.boprc.govt.nz).*

The specific provisions of the proposal that the Newman Group 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 may (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
23	Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments (a) and (c)	Oppose	Delete the area reference in (b) of the policy as follows: <del>(5 hectares or more)</del> Amend (c) in the policy as follows: for all <del>other</del> urban environments	There is no valid 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 play an important role in providing land for housing and business use.
23	Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments (d)	Oppose	Amend (d) as follows <i>The development is located with provides good accessibility between housing, employment, community and other services and open space, and</i>	The provision should be amended to provide for and acknowledge the provision of local services and amenities which are internal rather than external to a development site
28	Policy UG 14B: Restricting urban activities outside	Oppose	We seek the following changes to UG14B and its supporting explanation:	There may be circumstances where expansions to existing settlements (such as at Papamoa) are appropriate but where currently

	<p>urban environments and explanation</p>		<p><del>Restrict the</del> Manage growth of urban activities located outside urban environments unless it can be demonstrated that sound resource management principles are achieved, including:</p> <p>(a) The efficient <del>development and</del> use of the finite land resource, and</p> <p>(b) Providing for the efficient, <del>planned</del> and coordinated use and development of infrastructure, and</p> <p>(c) <u>there are benefits and efficiencies of expanding existing settlements/towns</u></p> <p>Explanation</p> <p>While areas outside urban environments have not been and are unlikely to face the same growth pressures, some urban growth pressures can be expected. Outside of urban environments and urban growth that forms part of an urban environment, new urban areas <del>(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.</del> There are however, some <del>limited</del> circumstances where such proposals could be acceptable such as extensions to existing towns <del>that have reticulated water and wastewater services.</del> 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. <del>For the avoidance of doubt, this policy does not enable development in villages and settlements that do not have reticulated water and wastewater services.</del></p>	<p>land is 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>45</p>	<p>Appendix E – Management and Growth areas for the western Bay of Plenty Mapping</p>	<p>Oppose</p>	<p>The RPS management and growth area maps should be retained until a Future Development Strategy has been approved.</p>	<p>There is currently no adopted Future Development Strategy for the Sub-region. The Western Bay Joint Spatial Plan prepared in 2021 has no formal status.</p> <p>It is therefore premature to delete Appendix E until such time there is a Future Development Strategy is in place as this will inhibit the consideration of unanticipated or out-of-sequence growth.</p>