



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: Vercoe Holdings 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 Vercoe Holdings Ltd submission relates to are as follows:

Page No	Reference	Support/Oppose	Decision Sought	Reasons
22	Policy UGA: Efficient use of land and infrastructure for urban growth and development. Explanation	Oppose	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
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: (5 hectares or more) Amend (c) in the policy as follows: for all other 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 will 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 (f)	Oppose	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	There is the need to ensure an adequate pipeline and supply of future land for urban development which has been a failing of recent growth management in the sub-region. Future development may in many instances 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.

			plan reviews initiated by local authorities do not fall within this policy, as they are anticipated.	
28	Policy UG 14B: Restricting urban activities outside urban environments and explanation	Oppose	<p>We seek the following changes to UG14B and its supporting explanation:</p> <p>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:</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, 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 (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>	There may be circumstances where expansions to existing settlements (such as Paengaroa) are appropriate but where currently such settlements are not serviced via reticulated services. Provisions need to be included in Change 6 to ensure that such settlements are not precluded from future consideration for urban growth.

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37	Method 18: Structure plans for land use changes/ Definitions	Oppose	Delete the term “Structure plans” throughout and replace with the term “Spatial plans” and amend the Structure plan definition to refer to Spatial plans	The term ‘structure plan’ is generally associated with infrastructure planning. The NPS-UD uses the terminology of “Spatial Plans” when considered in the context of the method.
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