

FURTHER SUBMISSION

Proposed Change 6 (NPS-UD) to the Bay of Plenty Regional Policy Statement

Under Clause 8 of the First Schedule, Resource Management Act 1991

To: Chief Executive Officer
Bay of Plenty Regional Council
PO Box 364
Whakatane 3158

By email: rpschange6@boprc.govt.nz

Further submission by: Urban Task Force for Tauranga (**UTF**)

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Tauranga 3143
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- 1 Urban Task Force for Tauranga (UTF) made a submission (#29) on Proposed Change 6 to the Bay of Plenty Regional Policy Statement.
- 2 UTF is a person who has an interest in Proposed Change 6 that is greater than the general public has, for the reasons that the submitter lodged an original submission on Proposed Change 6 on behalf of its members, and UTF also represents an aspect of the public's interest.
- 3 This submission does not relate to trade competition and/or the effects of trade competition.
- 4 UTF wishes to be heard at the hearing in support of their further submission, and if others make a similar submission, UTF will consider presenting a joint case at any hearing.
- 5 The further submission matters raised are detailed in the attached table which identifies the original submitter and the submission points made by UTF.
- 6 A copy of this further submission will be served on the original submitter within 5 working days after it has been served on Council.



Aaron Collier
For Urban Task Force for Tauranga
8 February 2023

Further Submission Points

This further submission by UTF is in relation to the original submission of:	The particular parts of the original submission UTF support/oppose are:	Our position on the original submission:	The reason for UTFs support/opposition to the original submission are:	Allow or reject the original submission:	Details of why UTF wish to allow/reject (in full or in part) to indicate the decision you want Council to make
Bell Road Limited Partnership PO Box 11057 Palm Beach Papamoa 3151 E: nathan@bhml.co.nz (Submission 11)	11.1	Support	Reference to adverse impacts on residential character and amenity values of existing urban areas is inconsistent with Policy 6 of the NPS-UD.	Allow	We consider that the submission should be accepted, and the provision should be deleted. Policy 6 of the NPS-UD acknowledges that planned urban built form may involve significant changes to an area and that those changes may detract from amenity values.
	11.2	Support	We agree that the reference to demand on infrastructure should be broadened beyond the current reference to roads.	Allow	We consider that the submission should be accepted and that the Council should broaden the provision to refer to water infrastructure as well as other network and social infrastructure and appropriate planning and funded network improvements.
	11.4	Support	The criteria as drafted do not address accessibility within a development area. This may contribute significantly to a well functioning urban environment as set out in the submission.	Allow	We consider that the submission should be accepted as the amendments are considered appropriate.
	11.4	Support	Unanticipated or out of sequence developmnet may affect planned and funded infrastructure and we agree that this may be an acceptable position, particularly where benefits	Allow	We consider that the submission should be accepted as the policy as drafted would continue to severely limit the opportunities for alternative

Further Submission # FS13

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			outway costs. Alternative growth proposals with significant merit have been deferred in favour of others which do not proceed and this must be avoided.		growth proposals and is inconsistent with Objective 2 of the NPS-UD
	11.5	Support in Part	Policy UG:7A refers to a range of “plans” other than the Future Development Strategy (FDS) which is inappropriate.	Allow	We consider that the submission should be accepted. The policy should only refer to the FDS. This is consistent with the approach set out in the NPS-UD. Reference to the range of other plans and strategies will create significant uncertainty in decision making. The FDS needs to be developed and adopted as an urgent priority.
	11.7	Support	We agree that reference to structure plans is associated with infrastructure planning rather than those matters in Method 18.	Allow	We consider that the submission should be accepted and that the term ‘structure plan’ should be replaced with ‘spatial plan’.
Element IMF PO Box 13289 Tauranga 3141 E: grant@elementimf.co.nz (Submission 01)	1.1	Support in Part	Policy UG:7A incorrectly relies on housing and business capacity assessments to determine the need for additional urban land. This is contrary to the NPS-UD which relies on the Future Development Strategy (FDS) as the method for identification.	Allow	We consider that the submission should be accepted so that the Policy refers to the Future Development Strategy (FDS) as the method for identification.

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	1.2	Support	As per 1.1 above, the correct policy approach is to refer to the FDS as per the NPS-UD.	Allow	As per 1.1 above.
Ford Land Holdings Pty Ltd c/- PO Box 13428 Tauranga 3414 Attention: Jeff Fletcher E: jeff.fletcher@bconn.co.nz (Submission 16)	16.2	Support	In terms of Policy UG:7A, we agree that plan changes can be either private or Council initiated as envisaged by the NPS-UD.	Allow	We consider that the submission should be accepted and that all references to “private” should be removed from the policy. The NPS-UD refers to “Plan Changes”, irrespective of whether they are Council initiated or private.
	16.14	Support in part	We agree that there should be consequential amendments to specifically refer to the Future Development Strategy (FDS).	Allow in part	The submission should be accepted in part. Urban development areas that have been identified should be provided for in an adopted Future Development Strategy (FDS). Other strategies and plans mentioned are unnecessary and many are contrary to the direction under the NPS-UD. Priority must be given to the development of an FDS.
	16.15	As above.	As above.	As above.	As above.
Western Bay of Plenty District Council 1484 Cameron Road, Greerton Tauranga 3112	33.5	Oppose	The submission seeks that Policy UG:7A (x) be amended to “require” increased density without any reference to a benchmark. Instead the RPS should provide for and enable density. The RPS should provide the policy means to enable	Reject.	The submission should be rejected. The amendment sought is contrary to Policy 1 of the NPS-UD which is to provide well functioning urban environments. The setting of specific densities should occur through lower order planning documents.

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Attention: Emily Watton E: Emily.watton@westernbay.govt.nz (Submission 33)			density. It is appropriate that density be set by City/District plan rules as part of future spatial planning and Plan Change processes.		
	33.7	Oppose	The addition of a further provision in Method 18 requiring applicants to “show how a variety of dwelling typologies will be provided for” is inappropriate to include in an RPS.	Reject	The submission should be rejected as matters such as housing typologies and housing types are inappropriate to be included in the method. Such matters are addressed through lower order planning documents, i.e. District/City Plan Changes, and through resource consents.
	33.8	Support	A definition of urban environments should be included.	Allow in part	We agree that a definition of urban environment should be included or a default provision should instead apply referring to all definitions not specifically included, applying as per section 1.4 of the NPS-UD.
Kainga Ora Homes and Communities PO Box 74598 Greenland, Auckland 1051	5.2	Support in part	We agree that Policy UG:7A should refer to the Future Development Strategy (FDS)	Allow in part	The submission should be accepted as the current wording is inconsistent with the NPS-UD and should refer to the demand for additional urban land being identified through the FDS rather than the range of plans and strategies currently referred to in the policy.

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E: developmentplanning@kaingaora.govt.nz (Submission 5)	5.3	Support	We agree that reference to housing choice should be included in policy UG:7A(X).	Allow	The submission should be accepted as the policy is currently restrictive and should be broadened to refer to housing choice to ensure that there is a range of housing types provided in new urban areas as per Policy 1 of the NPS-UD.
Tauranga City Council Private Bag 12022 Tauranga 3143 Attention: Andrew Mead E: Andrew.mead@tauranga.govt.nz (Submission 9)	9.5	Support	We agree that the removal of character and amenity values as adverse impacts should be removed from the issues statement in 2.8.1.	Allow	We consider that the submission should be accepted as the current wording is inconsistent with Policy 6 of the NPS-UD and is therefore inappropriate.
	9.10	Support in part	We agree with the amendment to Policy UG:6A with respect to the provision of access and reference to large scale urban development (rather than growth), however we do not consider that a 5 hectare trigger is necessary.	Allow in part	We consider that the submission should be accepted in part with respect to the changes in relation to the provision of access and reference to development. However, reference to the 5 hectare area is inconsistent with the policies under the NPS-UD which do not refer to any trigger in terms of land area relating to scale. Smaller areas still have the potential to deliver significant housing yield.
	9.17	Oppose in part	We consider that the provisions in Policy UG14B should be retained as per our original submission. We are concerned that if the policy is deleted/significantly modified as	Reject	We consider that the submission should be rejected and that the Council should retain Policy UG14B to deal with urban activities outside

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			<p>sought in the submission, there will be unintended consequences such as the inability to expand existing small settlements. Appropriate provisions need to be included in the RPS to ensure that smaller settlements are not precluded from future consideration for urban growth.</p>		<p>urban environments as modified by the UTF's original submission.</p>
	<p>9.31</p>	<p>Support</p>	<p>We agree that if terms are included which are not addressed through definitions, then the definitions section should be amended to refer to those definitions included in the NPS-UD.</p>	<p>Allow</p>	<p>We consider that this submission should be accepted and that where they exist, definitions referred to in section 1.4 of the NPS-UD should be adopted.</p>