

IN THE ENVIRONMENT COURT
AUCKLAND REGISTRY

I TE KŌTI TAIAO O AOTEAROA KI
TĀMAKI MAKĀURAU

ENV-2024-AKL-

IN THE MATTER of the Resource Management Act
1991 (the **Act**)

A N D

IN THE MATTER of an appeal pursuant to sch 1, cl 14 of
the Act

BETWEEN **URBAN TASKFORCE FOR TAURANGA
INCORPORATED**

Appellant

A N D **BAY OF PLENTY REGIONAL COUNCIL**

Respondent

NOTICE OF APPEAL


HOLLAND BECKETT
L A W

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TO: The Registrar
Environment Court
AUCKLAND

1. Urban Taskforce for Tauranga Incorporated (**UTF**) appeals against part of a decision of the Bay of Plenty Regional Council (**Council**) on Change No. 6 (NPS-UD) to the Bay of Plenty's Regional Policy Statement (**Proposed Change 6**).
2. UTF made a submission and a further submission on Proposed Change 6.
3. UTF is not a trade competitor for the purposes of section 308D of the Act.
4. UTF received notice of the decision on 9 February 2024.
5. The decision was made by the Council.
6. UTF is appealing part of the Proposed Change 6 decision. The part of the decision UTF is appealing is clause (b) of Policy UG 7A (the **Policy**), which states:

Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth

Urban environments, 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 add significantly to development capacity based on the extent to which the proposed development satisfies the following criteria:

...

b) For Tauranga City and Western Bay of Plenty District urban environments, the development is large scale (5 hectares or more), and sufficient to support multi modal transport options, and

Reasons for appeal

7. UTF's reasons for appealing this part of Proposed Change 6 are as follows:

- (a) There is no valid reason why smaller scale developments under 5 hectares cannot be considered under the Policy.
- (b) Exclusion of sites under 5 hectares is contrary to the National Policy Statement for Urban Development (**NPS-UD**) as these sites could have the capability to add significantly to development capacity.
- (c) There is no planning justification for the inclusion of the 5 hectare reference as criteria for implementing policy 8 of the NPS-UD.
- (d) The Policy fails to take into account the fact that sites may have other characteristics other than size (such as location) that contribute to its development capacity. If a site would significantly add to development capacity, but is under 5 hectares in size, it would be arbitrarily excluded by the Policy.
- (e) The panel's recommendation attempts to justify the 5 hectare minimum requirement by stating that the Policy does not limit itself to a single 5 hectare parcel of land, and that the minimum size could be *potentially* achieved by combination of multiple

parcels of land.¹ However, this approach fails to recognise the opportunity for cumulative areas of land under 5 hectares to have the capability to add significantly to development capacity.

- (f) An enabling approach should be adopted for development which occurs outside of and is not anticipated by the Future Development Scheme (**FDS**). Areas outside of the FDS may have the capability to add significantly to housing capacity.
- (g) The Policy provides for *unanticipated* urban growth, implying that there will be areas of development that would not be included in the FDS. In recognising that there will be urban growth that is not anticipated, the Policy should be phrased in such a way that it will encompass any site, regardless of its size.
- (h) The panel's recommendation refers to the draft Rotorua FDS being released for public consultation. This is not relevant to consideration of the 5 hectare minimum requirement as Policy UG 7A(b) only applies to the Tauranga City and Western Bay District urban environments.

Relief sought

8. UTF seeks the following relief:

- (a) The Policy is amended to address UTF's submission by deleting the words '*(5 hectares or more)*' in subclause (b) of the Policy;
- (b) Such further relief as the Court considers appropriate having regard to UTF's submission and further submission and the reasons for this appeal;

¹ Recommendation of Independent Hearing Panel at [97].

(c) Other consequential amendments to Proposed Change 6 which arise from amendments; and

(d) Costs.

9. UTF attaches the following documents to this notice:

(a) A copy of UTF's submission and further submission (with a copy of the submissions opposed and supported by UTF's further submission) ("**Attachment A**");

(b) A copy of the relevant decision ("**Attachment B**"); and

(c) A list of names and addresses of persons to be served with a copy of this notice ("**Attachment C**").

Signature:



Vanessa Hamm / Cory Lipinski
Counsel for Appellant

Date: 22 March 2024

**Address for service of
Urban Taskforce for Tauranga
Incorporated:**

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Vanessa Hamm / Cory Lipinski

Advice to recipients of copy of notice of appeal*How to become party to proceedings*

You may be a party to the appeal if you made a submission or a further submission on the matter of this appeal.

To become a party to the appeal, you must,—

- within 15 working days after the period for lodging a notice of appeal ends, lodge a notice of your wish to be a party to the proceedings (in form 33) with the Environment Court and serve copies of your notice on the relevant local authority and the appellant; and
- within 20 working days after the period for lodging a notice of appeal ends, serve copies of your notice on all other parties.

Your right to be a party to the proceedings in the court may be limited by the trade competition provisions in section 274(1) and Part 11A of the Resource Management Act 1991.

You may apply to the Environment Court under section 281 of the Resource Management Act 1991 for a waiver of the above timing or service requirements (*see* form 38).

How to obtain copies of documents relating to appeal

The copy of this notice served on you does not attach a copy of the appellant's submission and the decision appealed. These documents may be obtained, on request, from the appellant.

Advice

If you have any questions about this notice, contact the Environment Court in Auckland.

Attachment A

Submission and further submissions

SUBMISSION ON PROPOSED POLICY STATEMENT CHANGE UNDER CLAUSE 6 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT ACT 1991

TO: Bay of Plenty Regional Council

SUBMISSION ON: Change 6 to the Bay of Plenty Regional Policy Statement (NPS-Urban Development)

SUBMITTER: URBAN TASKFORCE FOR TAURANGA (“**UTF**”)

C/: Collier Consultants
PO Box 14371
Tauranga Mail Centre
Tauranga 3143
Attention: Aaron Collier

Scope of submission

1. The provisions of the Regional Policy Statement (“**RPS**”) which this submission relates are as set out in the submission table below.

Nature of submission

2. The nature of our submission is that we generally support change No. 6 to the RPS, but with appropriate amendments and further wording changes to address matters raised in our submission.

Reasons for submission

3. The Urban Task Force for Tauranga (“**UTF**”) is incorporated as a Society with its purpose being to represent its members who are property professionals and funders, developers, Iwi and Hapu, and owners and managers of properties in the Bay of Plenty. The UTF seeks to provide strong and informed leadership to Local Authorities, promote and foster productive local networks around property, and to advocate for the property industry by making submissions to both Central and Local Government.
4. The Western Bay of Plenty subregion has experienced significant growth pressure in recent decades. Our community is facing unprecedented challenges because in the past leaders have seen growth as a problem rather than an opportunity. The intent of UTF is to focus on the opportunities presented by growth and to unlock these opportunities by working collaboratively and innovatively across Government, Local Government and the private sector.
5. UTF advocates for connected thinking, connected planning, connected governments and strong leadership. UTF's submission is primarily focused on ensuring that Change 6 is consistent with the policies and requirements of the NPS-UD and that the Change 6 will be effective in achieving the intended outcomes required by the NPS-UD. UTF consider that changes to the RPS should be based on sound planning policy which will rectify the capacity shortage, whilst also avoiding unnecessary and inefficient process and uncertainty. UTF's view is that incorporating clear, certain and

efficient RPS provisions is a fundamental part of the sustainable and efficient growth of the subregion, and in giving effect to the NPS-UD

6. Poor growth management decision making has led to a lack of essential infrastructure investment and facilities necessary to support growth, which has resulted in a severe shortage of zoned and serviced land on which to provide new homes for residents. Urban limits have also restricted the ability of the sub-region to grow.
7. Currently, District Councils are in breach of housing capacity assessments under the NPS-UD and urgent action is required to address these capacity shortages. There must be sufficient development capacity provided to exceed demand.
8. To resolve the current crisis, Change 6 to the RPS is required to be responsive and to enable plan changes that add significantly to development capacity and contribute to a well-functioning urban environment. UTFs view is that further enabling amendments are required to Change 6 to achieve this. Changes are required to provide for unanticipated or out of sequence development, as set out in the submission table below.
9. UTF provides reasons for its submission and the changes sought to Change 6 provisions in the attached table.

Decision sought

10. The decision UTF seeks from the Council is that Change 6 be approved with:
 - (a) amendments to address UTFs submission.
 - (b) such further other relief or other consequential amendments as considered appropriate and necessary to address the concerns set out in the attached table.
11. UTF wish to be heard in support of their submission.
12. UTF would not gain an advantage in trade competition through their submission.
13. If others make a similar submission, UTF are prepared to consider presenting a joint case with them at any hearing.

SCOTT ADAMS

CHAIRMAN

Date: 06 September 2022

Address for Service:

URBAN TASKFORCE FOR TAURANGA (UTF)

C/: Collier Consultants

PO Box 14371

Tauranga Mail Centre

Tauranga 3143

Attention: Aaron Collier

Email: aaron@collierconsultants.co.nz

The specific provisions of the proposal that the UTF 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.	<p>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</p> <ul style="list-style-type: none"> (i) 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 <p>The current wording of the RPS is inconsistent with the NPS-UD and is therefore inappropriate.</p>
6	2.8.1 Regionally significant urban and rural growth management issues 9. Intensive Urban Development	Support	We support the amendment which recognises the need for well planned transport improvements to be provided with growth.	Well planned transport improvements are necessary to achieve successful intensification outcomes.
22	Policy UGA: Efficient use of land and infrastructure for urban growth and development. Explanation	Oppose in part	<p>Amend the explanation for the policy statement.</p> <p>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.</p>	The amendment clarifies the appropriate scale of urban design input that is required as part of the preparation of a spatial plan.

40	Appendix A – Definitions	Oppose	<p>The plan change refers throughout to “urban environment” but contains no definition of an urban environment. We seek that the following definition be included:</p> <p>Urban Environment: any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:</p> <p>(a) is, or is intended to be, predominantly urban in character; and</p> <p>(b) is, or is intended to be, part of a housing and labour market of at least 10,000 people.</p>	A definition is needed for the term.
23	<p>Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments</p> <p>Housing bottom lines</p>	Oppose in part	<p>We seek amendments to criterion (a) as follows:</p> <p><i>The development is of large enough a scale to contribute to meeting demand for additional urban land identified through the HBA for the area FDS or RMA Plans, Future Development Strategy including meeting housing bottom lines or meeting needs for specific housing typologies or price points, or business types. Where there is no HBA, FDS Future Development Strategy there is evidence that there is a need for additional urban land, and</i></p> <p>Explanation</p> <p>Remove all references to documents (other than the Future Development Strategy from the explanations for the policy).</p>	<p>The policy incorrectly relies on Housing and Business Capacity Assessments to determine the need for additional urban land.</p> <p>Referring to other documents as set out in the explanation will also create uncertainty.</p> <p>The approach is contrary to the NPS-UD which relies on the Future Development Strategy as the method for identification.</p>
23	Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments and (c)	Oppose	<p>Delete the area reference in (b) of the policy as follows:</p> <p>(5 hectares or more)</p> <p>Amend (c) in the policy as follows:</p> <p>for all other urban environments</p>	There is no 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 (d)	Oppose in part	<p>Amend (d) as follows</p> <p><i>The development is located with provides good accessibility between housing, employment, community and other services and open space, and</i></p>	The provision should provide for and acknowledge the contribution of local services and amenities which are internal rather than external to a development site.

	Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments (f)	Oppose	<p>Amend (f) as follows:</p> <p>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.</p> <p>Remove the following from the explanation:</p> <p>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 these documents.</p> <p>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 plan reviews initiated by local authorities do not fall within this policy, as they are anticipated.</p>	<p>There is the need to ensure an adequate pipeline and supply of future land for urban development which has been a failing of growth management in the sub-region.</p> <p>Future unanticipated development may impact on planned development and infrastructure, however benefits may outweigh costs, and in some instances the benefits (including efficiencies) may be significant.</p> <p>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.</p>
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 <u>to ensure</u> unless it can be demonstrated that sound resource management principles are achieved, including:</p> <ul style="list-style-type: none"> (a) The efficient development and use of the finite land resource, and (b) Providing for the efficient, planned and coordinated use and development of infrastructure, and (c) <u>there are benefits and efficiencies of expanding existing settlements/towns</u> <p>Explanation</p> <p>While areas outside urban environments have not been and are unlikely to face the same growth pressures, some urban growth</p>	<p>There may be circumstances where expansions to existing settlements (such as Paengaroa and parts of Te Puke) are appropriate but currently such settlements are not serviced via reticulated services. Provisions need to be included in the RPS to ensure that such settlements are not precluded from future consideration for urban growth.</p>

Submission # 29

			<p>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>	
37	Method 18: Structure plans for land use changes/Definitions	Oppose	<p>Delete the term “Structure plans” throughout and replace with the term “Spatial plans” and amend the Structure plan definition to refer to Spatial plans</p>	<p>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.</p>

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**)

Address for Service: c/- Collier Consultants Limited
PO Box 14371
Tauranga Mail Centre
Tauranga 3143
Attention: Aaron Collier
M: 021 744 707

Email: aaron@collierconsultants.co.nz

- 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

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
			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.

Further Submission # FS13

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
	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.

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
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.

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
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

Further Submission # FS13

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
			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.		urban environments as modified by the UTF's original submission.
	9.31	Support	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.	Allow	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.

6 September 2022

Chief Executive
Bay of Plenty Regional Council

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

Tēnā koe e Rangatira

Bell Road Limited Partnership has made a submission on Plan Change 6 (NPS-UD) to the Bay of Plenty Regional Policy Statement.

The Bell Road Limited Partnership is a joint venture between Zariba Holdings and Bluehaven Group, formed to acquire, investigate and plan for the urban development of some 350ha at Bell Road, Pāpāmoa.

A preliminary master plan has been developed, providing a mixed-used spatial planning assessment, and work is currently underway on natural hazard and servicing assessments, including stormwater modelling.

We note that NPS-UD strongly emphasises placemaking in and around known sub-regional centres to support strong multi-modal connections, more compact forms of housing, with community spaces, public services such as medical, and other mixed land-uses & businesses.

The proposed Bell Road development has the potential to enable large scale housing with 3,000+ residential dwellings, achieving at least 25 residential units/ha, with a mixed typology of compact housing including high density, medium density, terraced and affordable/leasehold housing options.

This development is being planned to also provide for:

- Public transport connection to Wairakei Urban Growth Area, including The Sands Town Centre, and linking into local and arterial loop routes to Te Puke, Paengaroa and wider WBOP networks.
- Cycling and pedestrian networks to Wairakei, and links to Te Puke and Paengaroa.
- Comprehensively planned accessible network of neighbourhood and local retail centres, parks, and a new primary school;
- Proximity to sub-regional community facilities proposed in Wairakei and Te Tumu, including aquatic, indoor sports, schools, sports fields, parks & reserves.

The above initiatives support regional network transportation efficiencies and decarbonisation through self-containment and multi-modal network.

Submission # 11

Although various submissions have been made to SmartGrowth, WBOP and TCC previously, this subject land is *out of sequence* with current plans formulated by Councils in the Western Bay of Plenty sub region.

The development, if it proceeds beyond the investigation stage, will require consideration under proposed Plan Change 6.

In broad terms, we support the proposed Plan Change 6.

Our submission mainly concerns policy *UG7A Providing for unanticipated or out-of-sequence urban growth – urban environments*. Our key issues are:

- The criteria should refer to the FDS and RMA plans, not the HBA. The HBA is not a plan. It is a tool used to inform the FDS alongside other inputs and does not deliver capacity on its own. It is a technical analysis that is not subject to formal consultation nor decision making under the RMA or LGA.
- The criteria as drafted does not give adequate consideration to the opportunities within a development area to create a well-functioning urban environment.
- We also seek that that Policy UG 18B: Managing rural development and protecting versatile land explain that the use of versatile land for urban development may be justified where there are limited alternatives available and efficient use (i.e. high intensity use) is made of that land to achieve a well-functioning urban environment.
- Ensuring the integration of land use and transportation acknowledges the benefits of proximity to existing and proposed sub-regional centres.

Ngā mihi,



Nathan York



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: Bell Road Partnership Ltd

This is a submission on **Proposed Change 6 (NPS-UD) to the Bay of Plenty Regional Policy Statement**

- 1 I could not gain an advantage in trade competition through this submission.
- 2 The details of my submission are in the attached table.
- 3 I wish to be heard in support of my submission. [*select one]
- 4 If others make a similar submission, I will consider presenting a joint case with them at a hearing.

[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.]

6 September 2022

Date

Submission # 11

Contact person: Nathan York

Telephone: 021535392

Email: nathan@bhml.co.nz

Address for Service of Submitter: PO Box 11057, Palm Beach, Pāpāmoa 3151

Daytime:

After Hours: n/a

Fax: n/a

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 my submission relates to are:

Page No	Reference	Support/Oppose	Decision Sought	Reasons
6	2.8.1 Regionally significant urban and rural growth management issues	Support	Deletion of “Adversely impact on the residential character and amenity values of existing urban areas”.	The reference to intensive urban development having the potential to ‘ <i>adversely impact on the residential character and amenity values of existing urban areas</i> ’ is inconsistent with the NPS policy direction and is inappropriate.
6	2.8.1 Regionally significant urban and rural growth management issues	Oppose	<p>Recognise potential adverse effects of intensive urban development on infrastructure in addition to roads including:</p> <ul style="list-style-type: none"> <u>Increased demand for intensive residential development may overload three waters, other network and social infrastructure if not undertaken with well-planned and appropriately funded network improvements.</u> 	A potential effect of intensification is to place increased demand on infrastructure in addition to roads which may become overloaded if not properly managed.
23	Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments	Oppose	<p>Amend to refer to the FDS and RMA Plans as the key documents that anticipate and sequence urban development with the following amendments to criterion (a):</p> <p><i>The development is of large enough scale to contribute to meeting demand for additional urban land identified through the HBA for the area FDS or RMA Plans, including meeting housing bottom lines or meeting needs for specific housing typologies or price points, or business types. Where there is no HBA, there is evidence that there is a need for additional urban land, and</i></p>	<p>The FDS and RMA Plans are the strategic planning documents recognised in the NPS UD.</p> <p>The criterion should not refer to the HBA. The HBA is not a plan. It is a tool used to inform the FDS alongside other inputs and does not deliver capacity on its own. It is a technical analysis that is not subject to formal consultation nor decision making under the RMA or LGA.</p> <p>The Explanation does not refer to the HBA, but to the FDS and other plans.</p>
23	Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments	Oppose	<p>Amend criterion (d)</p> <p><i>The development is located with will provide good accessibility between housing, employment, community and other services and open space, and</i></p>	<p>The criterion as drafted does not clearly address accessibility <u>within</u> a development area, which will also contribute significantly to a well-functioning urban environment.</p> <p>Large scale development can provide self-sustaining local services with significant long-term benefits to</p>

Page No	Reference	Support/Oppose	Decision Sought	Reasons
				liveability and greenhouse gas emissions that will contribute to well-functioning urban environment This includes provision of walkable local commercial, social and community service, schools, open space, and access to public and active transport modes.
			Amend (e) 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.	Unanticipated or out-of-sequence development may affect planned development and infrastructure, however this is an acceptable position where the benefits outweigh the costs. The proposed policy has a high threshold (i.e. <i>'...without materially reducing the benefits of other existing or planned development...'</i> and would act to severely limit the opportunities for alternative growth proposals and is inconsistent with the NPS-UD).
23	Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments	Oppose	Amend the Explanation: <i>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, or 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.</i>	The explanation lists other plans as 'or relevant plan or growth strategy, RMA planning document, Long Term Plan, or 30-year infrastructure strategy'. Referring to plans other than the FDS and RMA plans is inappropriate, being inconsistent with the NPS UD, and will create undesirable uncertainty. These other documents also may not always be aligned, or subject to the same rigour of analysis, community engagement, or decision making.
28	Policy UG 13B: Promoting the integration of land use and transportation	Oppose	Amend Policy 13B as follows: <i>Proximity to <u>existing and proposed</u> commercial centres, places of employment, community services and <u>areas of high amenity</u> are considered in transport planning to <u>that support higher density development and compact form.</u></i>	Changes are required to improve clarity and to better align with the preamble text.

Submission # 11

Page No	Reference	Support/Oppose	Decision Sought	Reasons
30	Policy UG 18B: Managing rural development and protecting versatile land	Support	<p>The qualification that the rural land resource is for <i>urban development that has satisfied the criteria in UG 7A</i> should be retained.</p> <p>Add the following (or similar) to the explanation:</p> <p><u><i>Use of versatile land for urban development may be justified where there are limited alternatives available and efficient use is made of that land to achieve a well-functioning urban environment.</i></u></p>	The explanation as drafted does not address the reasons for allowing use of versatile land for urban development.
37	Method 18: Structure plans for land use changes	Oppose	Replace the term “Structure plans” with “Spatial plans”	The term ‘Structure plan’ is now more associated with infrastructure planning rather than the broad scope of matters referred to in Method 18.

8th September 2022

The Policy Team
BOP Regional Council
PO Box 364
WHAKATANE 3158

Dear Sir/Madam

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

Element IMF has made a submission on Plan Change 6 (NPS UD) to the Bay of Plenty Regional Policy Statement.

This is a late submission. This late filing has resulted from an omission by our planning consultant who we had instructed to prepare a submission on our behalf.

Element IMF is the developer of the Tauriko Business Estate, which comprises approximately 180 hectares of industrial business land. We are currently working on plan change that will enable a further 100ha stage of development.

Element has taken an active interest in all spatial planning and policy processes undertaken within the subregion over the last 15 years to assure its long-term interests are recognised and provided for. This has included submissions on land use planning, infrastructure and funding policies. We strongly support spatial planning that takes a rational, evidence-based approach. Certainty provided through this process provides the necessary foundation for large scale private sector investment in urban development. The SmartGrowth settlement strategy anchored in the RPS provides the foundation for our substantial investment at Tauriko. Tauriko Business Estate has become a significant strategic industrial node that has supported the economic success of the sub region.

We understand the reasons for the plan change and support it in principle. Our primary concern with Plan Change 6 is to ensure that there is sufficient certainty in the process for considering unanticipated or out of sequence urban growth proposals. The Plan Change has potential to create risks when considered in the context of partially developed spatial plans for the WBOP subregion, such as UFTI and the SmartGrowth joint draft spatial plan. The RPS Management and Growth areas and related policies should be retained until the spatial plan and/or Future Development Strategy are formally adopted by the subregion.

Yours faithfully



Grant Downing
Element IMF Ltd



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: Element IMF Ltd

This is a submission on **Proposed Change 6 (NPS-UD) to the Bay of Plenty Regional Policy Statement**

- 1 I could not gain an advantage in trade competition through this submission.
- 2 The details of my submission are in the attached table.
- 3 I wish to be heard in support of my submission. [*select one]
- 4 If others make a similar submission, I will consider presenting a joint case with them at a hearing.

[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.]

6 September 2022

Date

Contact person: Grant Downing

Telephone: 021 779 144

Email: grant@elementimf.co.nz

Daytime:

After Hours: n/a

Fax: n/a

Submission # 01

Address for Service of Submitter: Unit 2, Level 2, 59 The Strand, Tauranga

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 my submission relates to are:

Page No	Reference	Support/Oppose	Decision Sought	Reasons
23	Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments	Oppose	<p>Amend to refer to the FDS and RMA Plans as the key documents that anticipate and sequence urban development with the following amendments to criterion (a):</p> <p><i>The development is of large enough scale to contribute to meeting demand for additional urban land identified through the HBA for the area FDS or RMA Plans, including meeting housing bottom lines or meeting needs for specific housing typologies or price points, or business types. Where there is no HBA, there is evidence that there is a need for additional urban land, and</i></p>	<p>The FDS is the strategic planning document that is recognised in the NPS UD.</p> <p>The criterion should refer to the FDS, not the HBA. The HBA is not a plan. It is a tool used to inform the FDS alongside other inputs and does not deliver capacity on its own. It is a technical analysis that is not subject to formal consultation nor decision making under the RMA or LGA.</p> <p>The explanation does not refer to the HBA, but to the FDS and other plans.</p>
23	Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments	Oppose	<p>Amend the Explanation:</p> <p><i>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, or 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.</i></p>	<p>The explanation lists other plans as 'or relevant plan or growth strategy, RMA planning document, Long Term Plan, or 30-year infrastructure strategy'.</p> <p>Referring to plans other than the FDS and RMA plans is inappropriate, being inconsistent with the NPS-UD, and will create undesirable uncertainty. These other documents also may not always be aligned, or subject to the same rigour of analysis, community engagement, or decision making.</p>
45	Appendix E – Management and Growth areas for the Western Bay of Plenty and key related policies.	Oppose	<p>Retain Management and Growth areas for the western Bay of Plenty and related policies UG5A, UG6A, and UG 7A until an FDS (or equivalent) has been formally approved.</p>	<p>TCC/WBOPDC/BOPRC have produced a draft FDS through SmartGrowth and several other spatial planning policy documents are at various stages of development. These have yet to be completed, including a formal public consultation and approval process.</p> <p>A subregional centres strategy and Tauranga Urban Strategy reviews were initiated several years ago but have yet to be completed and it is understood these will be reinitiated in 2023.</p>

Page No	Reference	Support/Oppose	Decision Sought	Reasons
				<p>While the principles of UFTI are generally supported there are gaps in its delivery that need to be addressed ahead of it being integrated into the SmartGrowth joint draft spatial plan/FDA.</p> <p>The Western Bay Joint Spatial Plan (2021) referred to in the s32 report is acknowledged as a 'first step' and is currently a draft with no formal status. Gaps are fundamental and include the need to <i>understand tangata whenua values and aspirations</i>. The draft will be an input to the FDS required by the NPS-UD. Close out of an FDS is mid-2024.</p> <p>The SmartGrowth Housing Action Plan is a stop gap measure and an evolving plan, while the above policy framework is finalised.</p> <p>It would be premature to delete the Management and Growth areas and related policies ahead of formal approval of the Spatial Plan/FDS. This will create a policy vacuum with no credible baseline against which to assess unanticipated or out-of-sequence urban growth under proposed policy UG 7A.</p>



Submission Form

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

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Submitter: Ford Land Holdings Pty Ltd

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.]*

6 September 2022
Date

Contact person: *[Name and Designation if applicable]*

Jeff Fletcher

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Email: jeff.fletcher@bconn.co.nz

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C/- PO Box 13428 Tauranga 3141

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 my submission relates to are:

Page No	Reference (Issue, Objective, Policy, or Method)	Support/ Oppose	Decision Sought What changes you would like to see	Give Reasons
22	Policy UG 6A: Sequencing of Efficient use of land and infrastructure for urban growth and development - western Bay of Plenty sub-region	Support	Adopt as notified.	Gives effect to the NPS-UD and provides for the sustainable management of growth in the region.
23	Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments	Support in Part	<ol style="list-style-type: none"> 1. Amend the first paragraph as follows: Private plan <i>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 add significantly to development capacity based on the extent to which the proposed development satisfies the following criteria.</i> 2. Make consequential changes where there are references to Private Plan Changes. 	<ol style="list-style-type: none"> 1. There is no definition for a Private Plan Change. The use of the word private may preclude government entities, agencies or bodies lodging Plan Changes. 2. Provides for the sustainable management of growth in the region.
24	Policy UG 7Ax: Enable increased-density urban development – urban environments	Support	Adopt as notified.	Gives effect to the NPS-UD and provides for the sustainable management of growth in the region.
25	Policy UG 8B: Implementing high quality urban design and live-work-play principles	Support	Adopt as notified.	Gives effect to the NPS-UD and provides for the sustainable management of growth in the region.
26	Policy UG 9B: Co-ordinating new urban development with infrastructure	Support	Adopt as notified.	Gives effect to the NPS-UD and provides for the sustainable management of growth in the region.
28	Policy UG 13B: Promoting the integration of land use and transportation	Support	Adopt as notified.	Gives effect to the NPS-UD and provides for the sustainable management of growth in the region.

Page No	Reference (Issue, Objective, Policy, or Method)	Support/ Oppose	Decision Sought What changes you would like to see	Give Reasons
28	Policy UG 14B Restricting urban activities outside <u>urban environments</u> the urban limits – western Bay of Plenty sub-region	Support	Adopt as notified.	Gives effect to the NPS-UD and provides for the sustainable management of growth in the region.
30	Policy UG 18B: Managing rural development and protecting versatile land	Support	Adopt as notified.	Gives effect to the NPS-UD and provides for the sustainable management of growth in the region.
31	Policy UG 19B: Providing for rural lifestyle activities – western Bay of Plenty sub-region	Support	Adopt as notified.	Gives effect to the NPS-UD and provides for the sustainable management of growth in the region.
32	Policy UG 20B: Managing reverse sensitivity effects on rural production activities and infrastructure in rural areas	Support	Adopt as notified.	Gives effect to the NPS-UD and provides for the sustainable management of growth in the region.
33	Policy UG 22B: Te Tiriti o Waitangi Principles	Support	Adopt as notified.	Gives effect to the NPS-UD and provides for the sustainable management of growth in the region.
35	Policy UG 24B: Managing reverse sensitivity effects on existing rural production activities in urban areas	Support	Adopt as notified.	Gives effect to the NPS-UD and provides for the sustainable management of growth in the region.
35	Policy UG 25B: Housing bottom lines – Rotorua and western Bay of Plenty sub-region	Support	Adopt as notified.	Gives effect to the NPS-UD and provides for the sustainable management of growth in the region.

Page No	Reference (Issue, Objective, Policy, or Method)	Support/ Oppose	Decision Sought What changes you would like to see	Give Reasons
110c	Section 2.11: Natural Hazards	Support in Part	<p><u>Consequential Amendment of second paragraph on p110c, as follows:</u></p> <p>However, by specifically providing for western Bay of Plenty urban limits in Appendix E, the Statement anticipates that any required risk reduction can be achieved within those urban limits while providing for urban development areas that have been 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.</p>	Gives effect to the NPS-UD and provides for the sustainable management of growth in the region.
28	Section 2.11: Natural Hazards 2.2.3 Use and allocation of coastal resources	Support in Part	<p><u>Consequential Amendment of second paragraph on p28, as follows:</u></p> <p><i>Coastal use and development can also result in conflict and competition for space, where uses and activities are not compatible or are not managed proactively and effectively. Management of coastal space to avoid conflicts, protect the rights of existing and lawfully established uses, retain amenity values and meet safety and navigation requirements is crucial and requires direction on which activities take priority, as well as guidance on managing the cumulative effects of coastal development. This can be achieved by providing direction (including in resource management planning documents) on the appropriate location and form of use and development within the coastal environment, encouraging development in areas where the natural character has already been highly compromised (except where areas and opportunities for restoration and rehabilitation have been identified) and constraining development on undeveloped land (except where urban development areas have been 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. land has been identified as an appropriate location of future urban growth within Appendix D and E).</i></p>	Gives effect to the NPS-UD and provides for the sustainable management of growth in the region.



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Submitter: Western Bay of Plenty District Council

This is a submission on **Proposed Change 6 (NPS-UD) to the Bay of Plenty Regional Policy Statement**

- 1 I **could not** gain an advantage in trade competition through this submission.
- 2 ~~I am/am not~~ directly affected by an effect of the subject matter of the submission that
 - (a) ~~adversely affects the environment, and~~
 - (b) ~~does not relate to trade competition of the effects of trade competition~~
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- 5 ~~If others make a similar submission, I will consider presenting a joint case with them at a hearing.~~

06/09/2022

[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.]

Date

Contact person: Emily Watton, Strategic Policy and Planning Programme Director

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The specific provisions of the proposal that my submission relates to are:

Page No	Reference (Issue, Objective, Policy, or Method)	Support/Oppose	Decision Sought What changes you would like to see	Give Reasons
	Proposed Change 6 (in its entirety)	Support in part	Progress with Proposed Change 6 with amendments as recommended below.	Western Bay of Plenty District Council (WBOPDC) acknowledges that the changes proposed to the Regional Policy Statement (RPS) are generally as a result of the National Policy Statement – Urban Development. They also reflect that times have changed since the RPS was made operative. Change 6 was produced in a collaborative manner with the TLA's and this has been appreciated.
	Policy UG 4A	Support	Delete Policy	Such yield requirements are no longer valid.
	Policy UG 5A	Support	Delete Policy	Urban limits have proved useful in the past, but in the current and future development environment are too rigid. The criteria contained in other policies are appropriate to manage any proposed developments.
	Policy UG 7A	Support	Retain as notified	The criteria listed are important to assess the appropriateness of unanticipated or out of sequence developments. They are essential for the funding of infrastructure and place-making purposes.

Submission # 33

	Policy UG 7AX	Support in part	Change "Provide for and enable" to "Require"	Providing for and enabling increased density does not mean it will happen. To ensure increased density is to occur it needs to be mandated, hence the use of the word "Require". It will then be up to the City/District Plans to set the targets.
	Policy UG 13B	Support in part	Change "regard should" to "regard must"	As with Policy UG7AX above the wording needs to be stronger to ensure that the matters listed are properly addressed.
	Method 18	Support in part	Add a new clause "Show how a variety of dwelling typologies will be provided for".	Unless the provision of a variety of dwelling typologies is mandated there will be a predominance of stand-a-lone houses on their own section which will not meet the housing needs of the community.
	Definitions	Support in part	Provide a definition of "urban environments": means existing urban areas that are serviced by urban level infrastructure including water supply and wastewater disposal.	The term "urban environments" is used in a number of places and clarity is required as to what it covers.
Page 33	Policy UG 22B – Te Tiriti o Waitangi Principles	Support in part	<ol style="list-style-type: none"> 1. Support the deletion of Policy UG 22B <i>Providing for Papakāinga</i> and the insertion of new Policy UG 22B <i>Te Tiriti o Waitangi Principles</i> 2. Add "Provide opportunities, in appropriate circumstances, for Māori involvement in decision-making on resource consents, 	<ol style="list-style-type: none"> 1. The scope of <i>Providing for Papakāinga</i> was narrow and only focused on the development of Māori land outside of planned urban development. We support the move to a more principled approach which more generally focuses on the how planning decisions can reflect the principles of Te Tiriti o Waitangi. 2. Policy UG 22B, largely reflects Policy 9 within the National Policy Statement on Urban Development 2020, however providing

			<i>designations, heritage orders, and water conservation orders” to Policy UG 22B.</i>	<p>opportunities for Māori involvement in decision making around resource consents (NPS Policy 9(c)) is not specifically reflected within Policy UG 22B.</p> <p>Policy UG 22B (b) addresses Māori involvement in decision making, however this only reflects NPS Policy 9(d). Including a statement which specifically addresses NPS Policy 9(c) will remove any ambiguity and make it clear how planning decisions on resource consents, designations, and orders should provide for te Tiriti o Waitangi principles.</p>
Pages 33 - 34	Policy UG 22B – Explanation statement	Support in part	<ol style="list-style-type: none"> Paragraph 2 – Amend explanation statement to refer to Policy UG 7A Paragraph 3 – Add “ Whilst outside the responsibilities of local authorities, it should be noted that the difficulties.....” to beginning of paragraph Paragraph 5 – Undertake further engagement with iwi and hapū before including any statement regarding cultural off-setting 	<ol style="list-style-type: none"> The explanation statement incorrectly references Policy UG 7B which is non-existent in the operative Regional Policy Statement, or within the scope of changes set out in Proposed Change 6. WBOPDC understands that the development of Māori land and the barriers that Māori face when developing Māori land is a significant issue for iwi and hapū within the Western Bay District and across the country. However, the factors stated in the explanation are largely outside of the responsibilities, and control of territorial authorities. WBOPDC acknowledges that Bay of Plenty Regional Council has opted to include references to cultural offsetting within the explanation text rather than as a main policy,

Submission # 33

				<p>thus giving the statement less weight. WBOPDC recognises that this has been done in recognition of the concerns that some hapū have raised in relation to cultural offsetting.</p> <p>WBOPDC's Tangata Whenua forum Te Ihu o Te Waka o Te Arawa has raised concerns about the concept of cultural offsetting and the impact that this could have on cultural heritage and sites of significance through their engagement with Bay of Plenty Regional Council. While these concerns have been noted, further work needs to be done to fully address these.</p> <p>The concept of cultural offsetting is also still under development and has yet to be developed into a robust framework. It would be prudent to undertake further engagement with hapū before any reference to cultural offsetting is included in the Regional Policy Statement.</p>
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2 September 2022

Attn: Bay of Regional Council

PO Box 364

Whakatāne 3158

Feedback provided via email: rpschange6@boprc.govt.nz

KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON A NOTIFIED PROPOSAL FOR THE ‘BAY OF PLENTY REGIONAL POLICY STATEMENT - PLAN CHANGE 6’ UNDER CLAUSE 6 OF SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT 1991

This is a submission on ‘The Bay of Plenty Regional Policy Statement – Plan Change 6’ (“RPS”) from the Bay of Plenty Regional Council (“BOPRC”).

The specific provisions of the proposal that this submission relates to:

‘The Bay of Plenty Regional Policy Statement – Plan Change 6’ in its entirety.

The Kāinga Ora submission is:

1. Kāinga Ora Homes and Communities (“**Kāinga Ora**”) is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:
 - a) Provide people with good quality, affordable housing choices that meet diverse needs; and
 - b) Support good access to jobs, amenities and services; and
 - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.

2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across the Bay of Plenty Region.
3. Kāinga Ora therefore has an interest in the RPS and how it:
 - i. Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”) and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**the Housing Supply Act**”);
 - ii. Minimises barriers that constrain the ability to deliver housing development across the housing continuum; and
 - iii. Provides for the provision of services and infrastructure and how this may impact on the existing and planned Kāinga Ora housing developments.
4. Overall, Kāinga Ora supports the updated RPS provisions. The submission seeks amendments to the *RPS* in the following topic areas:
 - i. *Housing choice* – Kāinga Ora seeks that housing choice is incorporated within Policy UG7Ax. The lack of housing supply and choice is of particular concern for Kāinga Ora and how this directly affects housing affordability.
 - ii. *Public Transport* - Kāinga Ora seeks the incorporation of equality in accessible transportation options that provide public transport options for all and to service those most in need. This is important as demand for public transport will likely increase or be required (i.e., new network connections) due to the anticipated residential growth and development that will occur across the region.
 - iii. *Infrastructure* – Kāinga Ora seeks that policies relating to infrastructure are updated to align with the NPS-UD and to provide more clarity on the level of service required for infrastructure to support increased urban intensification.
 - iv. *Te Tiriti o Waitangi* - Kāinga Ora support the inclusion of a policy or policies focusing on marae and papakāinga, Kāinga Ora seeks that the RPS promotes urban papakāinga to recognise that the diverse need for housing typologies and layouts.

5. The changes requested are made to:
- i. Ensure that Kāinga Ora can carry out its statutory obligations;
 - ii. Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
 - iii. Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
 - iv. Provide clarity for all plan users; and
 - v. Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.
6. The Kāinga Ora submission points and changes sought can be found within Table 1 of **Appendix 1** which forms the bulk of the submission.

Kāinga Ora seeks the following decision from Bay of Plenty Regional Council:

That the specific amendments, additions or retentions which are sought as specifically outlined in **Appendix 1**, shown in red and are struck through or blue and underlined, are accepted and adopted into the insert abbreviated plan change/proposed plan name, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Kāinga Ora wishes to be heard in support of their submission.

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its submission on *the RPS* to address the matters raised in its submission.



Brendon Liggett
Development Planning Manager
Kāinga Ora – Homes and Communities

ADDRESS FOR SERVICE: Kāinga Ora – Homes and Communities, PO Box 74598, Greenlane, Auckland 1051. Email: developmentplanning@kaingaora.govt.nz

Appendix 1: Decisions sought on ‘The Bay of Plenty Regional Policy Statement – Plan Change 6’

The following table sets out the amendments sought from Kāinga Ora to the ‘The Bay of Plenty Regional Policy Statement – Plan Change 6’ and also identifies those provisions that Kāinga Ora supports.

Proposed changes are shown as ~~strike through~~ for deletion and underlined for proposed additional text.

Table 1

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
<i>Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.</i>					
Insert Section Heading					
1.		<p><i>Policy UG 6A – Efficient use of land and infrastructure for urban growth and development.</i></p> <p><i>Manage urban development in a way that provides for:</i></p> <p><i>(a) The efficient use of land and infrastructure; and</i></p> <p><i>(b) The integration of land use and infrastructure provision.</i></p>	Support	<p>Kāinga Ora supports this policy as it is important to integrate urban growth with the means to service this growth at the same juncture. In turn, Kāinga Ora also supports Policy UG 9B which also requires the co-ordination of new development with infrastructure. Of particular support, is the RPS recognition that “any urban growth and development must recognise the impact of growth on existing infrastructure and provide an <u>equitable funding mechanism</u> for the costs of that infrastructure.”</p>	<i>Retain as proposed</i>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.
		<i>For the purpose of this policy, efficient use of land and infrastructure shall include consideration of the matters referred to in Policy UG 10B.</i>			
2.		<i>Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments</i> <i>Private plan changes, submissions on plan changes, or submissions on plan reviews providing for development of</i>	Support in part	Kāinga Ora generally supports this policy but seeks the inclusion of wording that requires the need to assess whether allowing out of sequence development compromises development ready land that is provided for within the FDS/Regional strategic and/or development framework.	<i>(a) The development is of large enough scale to contribute to meeting demand for additional urban land identified through the HBA or <u>FDS</u> for the area, including meeting housing bottom lines or meeting needs for specific housing typologies or price points, or business types. Where there is no HBA or <u>FDS</u>, there</i>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><i>Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.</i></p>
		<p><i>urban environments and urban growth that forms part of an urban environment, that is unanticipated or out-of-sequence, will add significantly to development capacity based on the extent to which the proposed development satisfies the following criteria:</i></p> <p><i>(a) The development is of large enough scale to contribute to meeting demand for additional urban land identified through the</i></p>		<p>While it is important to include the HBA and understand the demand for housing and business land in an urban environment, it is the FDS which forms the basis for integrated, strategic and long-term planning. The FDS helps local authorities set the high-level vision for accommodating urban growth over the long term and identifies strategic priorities to inform other development-related decisions. Therefore, Kāinga Ora request that the FDS is included in this policy.</p>	<p><i>is evidence that there is a need for additional urban land, and...</i></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><i>Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.</i></p>
		<p><i>HBA for the area, including meeting housing bottom lines or meeting needs for specific housing typologies or price points, or business types. Where there is no HBA, there is evidence that there is a need for additional urban land, and...</i></p>			
3.	Urban and Rural Growth Management Policies:	<p><i>Policy UG 7Ax: Enable increased-density urban development – urban environments Provide for and enable increased-density</i></p>	Support in part	<p>In addition to these provisions, Kāinga Ora seeks that ‘housing choice’ is included in the policy. The RPS has identified the lack of housing supply and choice within the Bay of Plenty Region and that housing affordability has declined and Kāinga Ora acknowledges</p>	<p><i>Policy UG 7Ax: Enable increased-density urban development – urban environments Provide for and enable increased-density urban development in urban environments that:</i></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.
	Policy UG 7Ax	urban development in urban environments that: (b) Encourages increased density in areas of identified demand.		this issue. A shortage of developable land and housing supply reduces housing choices and leads to increases in prices.	(b) Encourages increased density <u>and housing choice</u> in areas of identified demand.
4.	Urban and Rural Growth Management Policies: Policy UG 7Ax	Policy UG 7Ax: Provide for and enable increased-density urban development in urban environments that: (c) Is well served by existing or planned development infrastructure and public transport	Support in part	Kāinga Ora supports this policy but seeks additional wording to be included to require the incorporation of equality in accessible transportation options, that provide public transport options for all and to service those most in need. This is important as demand for public transport will likely increase or be required (i.e., new network connections) due	Policy UG 7Ax: Provide for and enable increased-density urban development in urban environments that: (c) Is well served by existing or planned development infrastructure and <u>equitable</u> public transport

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					Proposed changes are shown as striketrough for deletion and <u>underlined</u> for proposed additional text.
				to the anticipated residential growth and development that will occur across the region	
5.	Urban and Rural Growth Management Policies: Policy UG 7Ax	Policy UG 7Ax: Provide for and enable increased-density urban development in urban environments that: (c) Is well served by existing or planned development infrastructure and public transport	Support in part	Kāinga Ora supports this policy but seeks additional wording to be included to align with the wording within the NPS-UD. In this instance “well serviced” infrastructure leaves a level of ambiguity which could constrain future urban development. Under ‘Interpretations’ the NPS UD defines development capacity as:	Policy UG 7Ax: Provide for and enable increased-density urban development in urban environments that: (c) Is well <u>adequately</u> served by existing or planned development infrastructure and public transport

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.
				<p><i>development capacity means the capacity of land to be developed for housing or for business use, based on:</i></p> <p><i>(b) and the provision of adequate development infrastructure</i></p> <p>Kāinga Ora seeks that the wording is updated to align with the NPS-UD and to provide more clarity on the level of service required for infrastructure to support increased urban density.</p>	
6.	Urban and Rural Growth	Policy UG 22B: Te Tiriti o Waitangi Principles Ensure	Support in part	Kāinga Ora support the inclusion of a policy or policies focusing on marae and papakāinga, as well as kaumatua housing in	Policy UG 22B: Te Tiriti o Waitangi Principles Ensure planning decisions

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.</p>
	<p>Management Policies:</p> <p>Policy UG 22B</p>	<p><i>planning decisions provide for te Tiriti o Waitangi principles by:</i></p> <p><i>(a) Enabling Māori to develop their land, including but not limited to papakāinga housing, marae and community facilities</i></p>		<p>district plans and consider there is room for improvement across all regulatory plans within the BOP Region. However, it is not clear if this policy is for existing marae and papakāinga or the consideration of future or proposed marae and papakāinga also. By including this additional wording this will help to enable development on existing marae and papakāinga and reduces any ambiguity for those district/city plan provisions. This will also enable Māori to develop their existing land, where new land is not available or</p>	<p><i>provide for te Tiriti o Waitangi principles by:</i></p> <p><i>(a) Enabling Māori to develop their land, including but not limited to <u>existing and future</u> papakāinga housing, marae and community facilities.</i></p> <p><i><u>(aa) Promoting papakāinga in urban settings by providing plan enabled urban papakāinga.</u></i></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<i>Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.</i>
				<p>existing housing and infrastructure needs to be upgraded or redeveloped.</p> <p>Kāinga Ora also seeks that the RPS promotes urban papakāinga to recognise that the diverse need for housing typologies and layouts.</p>	

5 September 2022



The Chief Executive
Bay of Plenty Regional Council
PO Box 364
Whakatāne 3158

By email to: rpschange6@boprc.govt.nz

Tauranga City Council Submission on Proposed Change 6 (NPS-UD) to the Bay of Plenty Regional Policy Statement

Please find attached a submission from Tauranga City Council (TCC) on Proposed Change 6 (NPS-UD) to the Bay of Plenty Regional Policy Statement (RPS).

TCC has been engaging with Bay of Plenty Regional Council (BoPRC) regarding the implementation of the National Policy Statement on Urban Development (2020) (NPS-UD) and the development of Proposed Change 6.

Our approach focussed on the matters required to be included by the NPS-UD, as informed by the Ministry for the Environment's 'Understanding and implementing the responsiveness planning policies' guidance.

We are pleased to note that the issues we identified previously have been addressed in Proposed Change 6, and our submission therefore is broadly in support.

The details of our submission are outlined in the attached table, together with a number of recommendations for minor amendments and clarification.

Please direct any queries regarding our submission to Simon Banks (Project Leader: Urban Planning) on 027 283 9107 or at simon.banks@tauranga.govt.nz in the first instance.

Yours sincerely

Andrew Mead
Manager: City Planning and Growth
027 763 5762
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The specific provisions of the proposal that our submission relates to are:

Page No.	Reference	Support/ Oppose	Decision Sought (changes highlighted in yellow with additions <u>underlined</u> , deletions struck out , and text to be reconsidered highlighted in blue)	Reasons
4	2.8	Support with amendments	<p>... The Bay of Plenty's population is steadily growing with the western Bay of Plenty sub-region projected to contain most of the population growth to 2021. Growth in the other districts is not expected to exceed 5% (Statistics New Zealand).</p> <p>The western Bay of Plenty sub-region has determined through its 50-year growth management strategy (SmartGrowth Strategy and Implementation Plan, 2007 2013) how the pressures of growth will be best managed in a time, resource and cost-effective manner. <u>This strategy was refreshed through the Urban Form and Transport Initiative (UFTI) Connected Centres Programme (2020), which set out an integrated land use and transport programme, and delivery plan for the western Bay of Plenty. UFTI caters for projected population growth, housing demand, and additional transport movements within the next 30 to 70 plus years.</u></p> <p>The districts of Rotorua, Whakatāne, Ōpōtiki and Kawerau have different pressures. Rotorua and Whakatāne District Councils have undertaken their own urban growth strategies.</p> <p>The management of growth in western Bay of Plenty sub-region has been provided for through policies in this section and through the identification of Growth Management Areas as detailed in Appendices C, D and E. In order to achieve an integrated management approach to urban development in these areas, as required under section 30(1)(a) of the Act, it is appropriate that all relevant objectives and policies shall be considered together to provide for sustainable growth of the sub-region and give effect to this Regional Policy Statement.</p>	<p>The statement that “the western Bay of Plenty sub-region projected to contain most of the population growth to 2021” is vague and is no longer relevant in 2022. It should be deleted or revised to reflect updated population growth projections. For example, UFTI uses a 30-year population forecast from the National Institute of Demographic and Economic Analysis (NIDEA) of reaching a western Bay of Plenty population of approximately 269,000 people requiring an additional 35,000 plus homes. For the long term (70 plus years), UFTI uses a population scenario of reaching a western Bay of Plenty population of approximately 400,000 people requiring an additional 62,000 plus homes.</p> <p>This section should be amended to include reference to the UFTI Connected Centres Programme, which in effect represents the most up-to-date SmartGrowth Settlement Pattern. In the absence of a Future Development Strategy (FDS), it is the UFTI Connected Centres Programme that would allow us to determine when urban development is anticipated vs unanticipated, and in or out of sequence for the purposes of the responsive planning policies.</p> <p>Support the removal of the reference to growth management areas and associated appendices which are inconsistent with the NPS-UD.</p>
5-6	2.8.1	Additional change suggested	<p>1 - Un-coordinated growth and development</p> <p>Sporadic and un-coordinated, <u>and poorly connected</u> growth and development can adversely affect urban and rural amenity values, heritage, health and safety, <u>accessibility</u>, transportation costs, the provision and operation of infrastructure, the use and development of productive rural land and important mineral resources, and access to community, social, employment and commercial facilities.</p>	<p>Include “poorly connected” in the description of growth and development which can have adverse effects, to reinforce the integration of urban form and transport.</p> <p>Include “accessibility” in the list of matters which can be adversely affected by un-coordinated growth and development, as accessibility is a key part of a well-functioning urban environment as described in Policy 1 of the NPS-UD.</p>
		Support	<p>2 - Land supply and inefficient patterns of land use</p> <p>An imbalance of land supply, demand, and uptake can have adverse economic and social effects, yet it is very difficult to plan and predict. Inefficient and low density patterns of land use and ad hoc development, are difficult and costly to service and maintain, <u>and contribute to increasing greenhouse gas emissions. A shortage of developable land and housing supply reduces housing choices and leads to increases in prices.</u> Unplanned growth and inefficient land use also have the potential to adversely affect rural production activities and to reduce the ability of versatile land to be used for a range of productive purposes.</p>	<p>Support inclusion of references to emissions, housing choice, and affordability as these are key issues for our community.</p>
		Support	<p>9 - Intensive urban development</p> <p>More intensive urban development is necessary to accommodate growth but has the potential to:</p> <ul style="list-style-type: none"> Adversely impact on the residential character and amenity values of existing urban areas. Create unforeseen social, economic and cultural effects. Increase road congestion leading to restricted movement of goods and services to, from, and within the region, and compromising the efficient operation of the transport network, <u>if not undertaken in conjunction with well-planned transport improvements.</u> 	<p>Support removal of character and amenity values as adverse impacts on these matters are not limited to intensive urban development and are best managed through District and City Plans.</p> <p>Support inclusion of reference to well-planned transport improvements to reinforce the integration of urban form and transport.</p>
7-13	Table 8	-	Urban and rural growth management objectives and titles of policies and methods to achieve the objectives.	Comments on objectives, policies and methods below should be reflected in Table 8 as appropriate.
9	Objective 25	Support	Urban subdivision, use and development, in the western Bay of Plenty is located and staged in a way that integrates with the long term planning and funding mechanisms of local authorities, central government agencies and network utility providers and operators whilst <u>also being responsive</u> having regard to the growth plans of relevant industry sector groups <u>and other development entities.</u>	Amendments are consequential only. Comma to be added.
21	Policy UG 4A	Support	Providing for residential development yields in district plans - western Bay of Plenty sub-region Provide for dwelling yields per hectare of developable land within identified urban areas to be delivered as follows:	Support removal of yield requirements from the RPS, particularly as the number of dwellings per hectare was significantly below current best practice and market trends. As outlined in the explanation to Policy UG 7Ax, we agree

Page No.	Reference	Support/ Oppose	Decision Sought (changes highlighted in yellow with additions <u>underlined</u> , deletions struck-out , and text to be reconsidered highlighted in blue)	Reasons
			<p>(a) Greenfield urban growth areas</p> <p>— An average net yield of 12 dwellings or more per hectare from 1 July 2012, rising progressively to 15 dwellings or more per hectare by 1 July 2037.</p> <p>(b) Urban intensification areas</p> <p>— An average net yield of 20 dwellings or more per hectare of developable land within each urban intensification area.</p> <p>Explanation</p> <p>The western Bay of Plenty subregion has a growth management strategy (SmartGrowth) which forms the basis of a number of Urban and Rural Growth Management policies.</p> <p>Greenfield development should ultimately deliver 15 dwellings per hectare across the developable land in the entire growth area shown in Appendix C. Development in urban intensification areas should deliver a yield of at least 20 dwellings per hectare within each identified area.</p> <p>The policy provides for the yield target for Greenfield urban growth areas to be achieved progressively over time, acknowledging that there may be situations where the ultimate target yield of 15 dwellings per hectare cannot always be achieved.</p> <p>For the avoidance of doubt, yields below the stated target achieved prior to 1 July 2037 are not required to be off-set by the achievement of yields greater than the stated target after 1 July 2037.</p> <p>The mechanism of how to achieve the target yields through subdivision and land use development is to be provided in the relevant district plan.</p> <p>The requirement for new residential development to achieve higher densities than in the past is to promote a more compact urban form and so create vibrant areas for people to live, work and play. Density is important in terms of determining land requirements and influencing urban form.</p> <p>Increasing the development densities for greenfield development within the urban limits is a means of restraining urban sprawl and the impact that may have on versatile highly productive land. Achievement of a more compact urban form requires a comprehensive planning approach and the provisions of a mix of housing types to appeal to future residents. This applies particularly to the urban intensification areas where significant redevelopment of existing housing stock is expected to achieve the yield target.</p> <p>Increasing dwelling density is recognised internationally as having a number of benefits, including:</p> <ol style="list-style-type: none">1. Increased transport choice and viability of public transport;2. Reduced environmental impacts from slower urban expansion;3. Reduced infrastructure costs;4. More walkable neighbourhoods;5. Greater housing choice and affordability. <p>Before rezoning land for urban purposes (large scale land use change of 5 hectares or more) councils are required to ensure that structure plans are put in place (see Policy UG 9B and Method 18).</p> <p><u>Table reference: Objective 25, Method 1</u></p>	that density targets and provisions are best set (if they are to be set at all) in District Plans relative to local opportunities and constraints (including infrastructure and transport systems).
22	Policy UG 5A	Support	<p>Establishing urban limits – western Bay of Plenty sub-region</p> <p>Establish urban limits as provided in Appendix E within which urban activities shall occur up to at least 2051.</p> <p>Explanation</p> <p>In association with the nature of long term urban boundaries provided in Appendix C, Diagram 1 (Appendix D) and Maps 5 to 15 (Appendix E), urban development is enabled with a high degree of long term certainty as to location, yield, sequencing and timing. This assists long term strategic planning and also provides considerable certainty as to the future of land outside the urban limits, providing a strong basis for assuming that such land will have a non-urban future until at least 2051.</p> <p>Method 14 (Monitor and review growth) provides a strict but comprehensive methodology on how and when amendments to the urban limits may be made, with an assumption that changes will not be made lightly, and will need to be well justified in terms of the outcomes sought across all the western Bay of Plenty sub region growth management policies.</p> <p><u>Table reference: Objective 25, Methods 1, 14 and 16</u></p>	Support removal of urban limits as these are inconsistent with the responsive planning policies of the NPS-UD.

Page No.	Reference	Support/ Oppose	Decision Sought (changes highlighted in yellow with additions underlined , deletions struck-out , and text to be reconsidered highlighted in blue)	Reasons
22	Policy UG 6A	Support with amendments	<p>Sequencing of Efficient use of land and infrastructure for urban growth and development – western Bay of Plenty sub-region</p> <p>Manage urban development within each identified management area in a way that provides for:</p> <p>(a) The efficient use of land and infrastructure within the immediately preceding growth area stage before the development of the subsequent growth area stage as shown in Appendix C and Appendix D; and</p> <p>(b) The integration of land use and infrastructure provision. Network infrastructure is able to be provided to serve the proposed new growth area, or new infill/intensification areas shown in Appendix C and Appendix D.</p> <p>Urban growth area development may proceed in a manner other than sequential growth as per (a) where it can be demonstrated that concurrent development of a subsequent growth area stage will provide more efficient use of land and network infrastructure overall and the conditions in (b) are met.</p> <p>For the purpose of this policy, efficient use of land and infrastructure shall include consideration of the matters referred to in Policy UG 10B.</p> <p>Appendices C and D are indicative guides for the expected timing and sequencing of growth areas.</p> <p>Explanation</p> <p>The servicing (including provision of access) sequencing and timing of urban development within the urban limits for the western Bay of Plenty is critical to achieving integrated and sustainable growth management. Each Large-scale urban growth development of 5 hectares or more (greenfield and brownfield) area in Appendix C and Appendix D and shown on Maps 5 to 15 (Appendix E) Each Large-scale urban growth development of 5 hectares or more (greenfield and brownfield) area in Appendix C and Appendix D and shown on Maps 5 to 15 (Appendix E) must be subject to detailed structure planning to address, among other matters, urban design, and provisions and funding of network infrastructure and funding of that infrastructure.</p> <p>Note that the indicative sequencing and time frames are at a level of detail appropriate for this Statement. They are intentionally indicative given the uncertainties inherent in population forecasts.</p> <p><u>Table reference: Objective 25, Methods 1, 18, 50 and 51</u></p>	<p>Support the intent of this policy but request minor amendments for clarification and consistency with the wording used in the NPS-UD and elsewhere in the RPS.</p> <p>Add “(including provision of access)” to clarify that servicing includes access.</p> <p>Replace “Large-scale urban growth” with “Large-scale urban development of 5 hectares or more”. The term “urban development” encompasses a wider variety of activities than “urban growth”, better describes brownfield redevelopment situations, and more accurately reflects the language of the NPS-UD. The addition “of 5 hectares or more” clarifies what is intended by “large scale” and ensures consistency with the proposed text of Policy UG 7A(b) and the current application of Method 18. We note this clarifying text was previously used in Policy UG 4A.</p>
23	Policy UG 7A	Support	<p>Providing for the expansion of existing business land – western Bay of Plenty sub-region</p> <p>Provide for the expansion of existing business activities or existing zoned business land outside the urban limits shown in Appendix E, only if the proposal will:</p> <p>(a) For the expansion of existing zoned business land, not be able to be accommodated within existing business zoned land in the western Bay of Plenty sub-region;</p> <p>(b) Be contiguous with the site of an existing business activity or existing zoned business land;</p> <p>(c) Not require new connections to urban water supply distribution, stormwater or wastewater infrastructure located within the urban limits;</p> <p>(d) Avoid, remedy or mitigate effects on rural production activities;</p> <p>(e) Not compromise access to identified regionally significant aggregate and other mineral resources; and</p> <p>(f) Not adversely affect existing, consented, designated or programmed regionally significant network utilities and infrastructure.</p> <p>Explanation</p> <p>Restrictions on the expansion of existing business activities and existing zoned business land outside the urban limits are necessary in order to minimise urban expansion and provide for the efficient use of existing infrastructure. The policy presumes that the expansion of existing business activities and existing business zoned areas outside the urban limits will not be allowed unless all of the listed matters are satisfied.</p> <p><u>Table reference: Objective 25, Methods 1 and 67</u></p>	<p>Support removal of current Policy UG 7A as it includes reference to urban and is inconsistent with the responsive planning policies of the NPS-UD.</p>
23	Policy UG 7A	Support with amendments	<p><u>Providing for unanticipated or out-of-sequence urban growth – urban environments</u></p> <p>Private plan changes, submissions on plan changes, or submissions on plan reviews providing for urban development of urban environments and urban growth that forms part of an urban environment, that is unanticipated or out-of-sequence, will be treated, for the purpose of implementing Policy 8 of the NPS-UD, as adding significantly to development capacity based on the extent to which the proposed development satisfies the following criteria:</p>	<p>Support the intent of this policy, however the proposed wording is confusing and overly complex. Taking guidance from Objective 6, Policy 8, and Clause 3.8 of the NPS-UD, we have requested changes to the proposed wording to remove complexity, duplication, and better align with the wording used in the NPS-UD itself.</p> <p>With regard to the explanation, we have requested some minor amendments for clarification. We particularly support the clarification that this policy applies</p>

Page No.	Reference	Support/ Oppose	Decision Sought (changes highlighted in yellow with additions <u>underlined</u> , deletions struck out , and text to be reconsidered highlighted in blue)	Reasons
			<p>(a) The development is of large enough scale to contribute to meeting demand for additional urban land identified through the HBA for the area, including meeting housing bottom lines or meeting needs for specific housing typologies or price points, or business types. Where there is no HBA, there is evidence that there is a need for additional urban land, and</p> <p>(b) For Tauranga City and Western Bay of Plenty District urban environments, the development is large scale (5 hectares or more), and <u>sufficient able</u> to support multi modal transport options, and</p> <p>(c) For all other urban environments, the development is at a scale commensurate with the size of the urban environment and includes a structure plan for the land use change that meets the requirements of Method 18, and</p> <p>(d) The development is located with good accessibility between housing, employment, community and other services and open space, and</p> <p>(e) The development is likely to be completed earlier than the anticipated urban development and/or land release sequence, and</p> <p>(f) 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.</p> <p>Explanation</p> <p>Policy UG 7A implements Policy 8 and Clause 3.8(3) of the National Policy Statement on Urban Development 2020. It requires that the RPS include criteria for determining whether unanticipated or out-of-sequence urban development proposals will add significantly to development capacity.</p> <p><u>This policy applies to Māori urban development enabled by Policy UG 22B: Te Tiriti o Waitangi Principles, where that development is unanticipated or out-of-sequence.</u></p> <p><u>This policy does not apply to small scale alterations to urban environments that have minor effects.</u></p> <p><u>In addition to these criteria the development must be well-connected to existing or planned multi modal transport corridors and must contribute to a well-functioning urban environment.</u></p> <p><u>Unanticipated urban 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.</u></p> <p><u>The criteria apply to private plan change requests, submissions on plan changes and submissions on plan reviews seeking additional greenfield or brownfield urban development. Plan changes and plan reviews initiated by local authorities do not fall within this policy, as they are anticipated.</u></p> <p><u>Where urban development satisfies the criteria, local authorities must respond by removing unnecessary constraints and focusing resources and attention to expedite decision making processes.</u></p> <p><u>These criteria do not negate the requirement for urban development to give effect to the RPS as a whole, including all other relevant objectives and policies, satisfying other criteria, and implementing relevant methods.</u></p> <p><u>Policies UG 6A, 9B, 10B and 11B and Method 18 are particularly relevant to ensure proposals are designed so that infrastructure, including multi-modal transport and three-waters infrastructure, provides for longer-term development</u></p> <p><u>Climate change and natural hazards can have significant impacts on the region's urban growth aspirations and on people, property and infrastructure. Prior to 'live zoning' land for structure planning and development purposes, consideration is to be given to whether a site is significantly constrained by the effects of climate change or natural hazards.</u></p> <p><u>For avoidance of doubt, giving effect to meeting the criteria in Policy UG 7A does 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 Policies IR 5B, UG 10B and UG 11B.</u></p> <p><u>Table reference: Objective 23 and 25, Methods 1, and 3 and 18</u></p>	<p>only to urban development proposals arising from private plan changes, or privately initiated submissions to council plan changes or plan reviews.</p> <p>The explanation states that this policy applies to Māori urban development enabled by Policy UG 22B where that development is unanticipated or out of sequence, mirroring a similar statement in Policy UG 22B itself. This would mean that for Tauranga City and Western Bay of Plenty District urban environments, the scale of the development would need to be 5 hectares or more for the responsive planning policies to apply. This threshold may not be feasible in relation to Māori development, and we suggest that this statement is reconsidered to avoid any unintended restrictions on the development of Māori land.</p> <p>In addition to the changes requested, we suggest that the explanation is revised to group the various statements together under new sub-headings in a more logical order. The matters covered in the explanation are broad, and the text as proposed jumps around in a slightly scattered fashion. While this would not alter the intent of the policy, it would perhaps improve usability.</p> <p>With these amendments, we are satisfied that this policy meets the requirements of the NPS-UD in relation to responsive planning policies.</p> <p>Note typo in spelling of “infrastructure” in clause (f).</p>
24	Policy UG 7Ax	Support with amendments	<p><u>Enable increased-density urban development – urban environments</u></p> <p><u>Provide for and enable increased-density urban development in urban environments that:</u></p> <p>(a) <u>Contributes to a well-functioning urban environment,</u></p> <p>(b) <u>Encourages increased density in areas of identified demand, and</u></p> <p>(c) <u>Is well served by existing or planned development infrastructure and multi modal transport corridors public transport.</u></p>	<p>Support the intent of this policy but request minor amendments for clarification and consistency with the wording used in the NPS-UD itself.</p> <p>Amend clause (c) to refer to “multi modal transport corridors” rather than just “public transport”. Walking and cycling are also critical to delivery of increased density urban development, and should be considered as part of integrated corridors.</p>

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			<p><u>Explanation</u></p> <p>Increasing density of urban development has a number of benefits, including:</p> <ol style="list-style-type: none"> 1 Increased transport choice and viability of public transport 2 Reduced environmental impacts from reduced need for urban expansion 3 Reduced per unit infrastructure costs 4 More walkable neighbourhoods, supporting active transport modes 5 Reductions in greenhouse gas emissions 6 Greater housing choice and therefore affordability. <p>Increased density refers to development that is higher density than the existing urban form. Increased density development may not be appropriate in some areas and is relative to different urban environments. City and district plans should enable greater building heights and density where there is high housing and business use and demand.</p> <p>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 targets and provisions are best set in district or city plans relative to local opportunities and constraints (including infrastructure and transport systems).</p> <p>This policy does not negate the requirement for increased density urban development to give effect to other relevant provisions in this policy statement and in particular Policy UG 8B Implementing high quality urban design and live-work-play principles set out in Appendix B. Urban development will also be directed by Future Development Strategies, which must achieve well-functioning urban environments in existing and future urban areas. Territorial authorities may develop spatial plans to assist achieving high quality urban design and outcomes.</p> <p><u>Table reference: Objective 23 and 25, Methods 1, 3 and 18</u></p>	
25	Policy UG 8B	Support with amendments	<p>Implementing high quality urban design and live-work-play principles</p> <p>Demonstrate adherence to the New Zealand Urban Design Protocol (March 2005) key urban design qualities.</p> <p>In achieving this, territorial authorities shall implement the region’s “high quality urban design” and “live-learn-work-play” principles as outlined in Appendix B, and additionally appropriate social infrastructure necessary to cater for an aging population, and include appropriate policies, methods and other techniques in their district plans and strategies.</p> <p>This policy shall not apply to land use change (such as rural-residential or lifestyle development) within the rural catchments of the Rotorua lakes where such change will result in a significant reduction in nutrient losses from existing rural land uses.</p> <p>Explanation</p> <p>Growth and the development of new and existing urban areas across the region (particularly in the western Bay of Plenty) should apply urban design principles for the development of connected communities, an effective transport system and creating desirable places for people to live, learn, work and play.</p> <p>The high quality urban design and live-work-play principles are key drivers of sustainable growth management. These principles are considered to be critical tools for ensuring that more intensively developed <u>well-functioning</u> urban environments are achieved, along with high quality urban design.</p> <p><u>Table reference: Objective 23, Methods 3, 4, 17, 18 and 58</u></p>	We note that SmartGrowth now operates live, learn, work play principles. “Learn” should be added to both the policy text and the explanation where it currently refers to live, work, play.
	Policy UG 9B	Support	<p>Co-ordinating new urban development with infrastructure</p> <p>Ensure there is co-ordination between:</p> <ol style="list-style-type: none"> (a) The urban form and layout, location, timing and sequencing of new urban development; and (b) The development, funding, implementation and operation of transport and other infrastructure serving the area in question, <p>so that all infrastructure required to serve new development is available, or is consented, designated or programmed to be available prior to development occurring.</p> <p>For Tauranga City and Western Bay of Plenty District only, in satisfying this policy, regard must be had to the indicative growth area timing shown in Appendix C.</p> <p>Explanation</p> <p>Region-wide:</p>	Support this consequential change to align with other changes.

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			<p>The policy gives effect to the statutory requirement of regional councils under section 30(1)(gb) of the Act to provide for the strategic integration of land use and infrastructure.</p> <p>Territorial authorities and most network utility operators plan and budget the provision of services many years in advance of their delivery. When constructed, these works (roads, sewers, water supply, stormwater systems, reserves and other community facilities) need to be used in order to recoup the costs of their provision. Therefore, it is important that before new urban development within or outside of existing or future urban areas is proposed, there is certainty that the infrastructure necessary to service such development will actually be available when required. The efficient and effective operation of regionally significant network utility services that traverse areas of urban growth, but that do not necessarily serve them directly must also be considered. Where appropriate, local authorities should also encourage the co-ordination and co-location of works between network utility operators to minimise environmental and amenity impacts and community concern and disruption.</p> <p>Western Bay of Plenty sub-region:</p> <p>Any <u>urban growth and development</u> within a growth area including an intensification area must recognise the impact of growth on existing infrastructure and provide an equitable funding mechanism for the costs of that infrastructure. Other contributions (e.g., recognising the costs and benefits of public transport) towards achieving environmental sustainability in new developments can be estimated and funding sources determined at the national, regional, city and district levels as part of 10-yearly, three yearly and annual budgeting cycles.</p> <p>Table reference: Objective 23, Methods 3, 4, 18, 19, 50 and 51</p>	
28	Policy UG 13B	Support with amendments	<p>Promoting the integration of land use and transportation</p> <p>In promoting the integration of land-use and transport activities, regard should be given to:</p> <p>(a) Land use and transport planning being closely linked,</p> <p>(b) The land transport system providing a range of transport mode choices to provide access opportunities and integrated links for both public and private transportation modes,</p> <p><u>(c) Proximity to commercial centres, places of employment, community services and high amenity are considered in transport planning to support higher density development.</u></p> <p>(e)(d) Demand management is considered in planning, design and transport investment decisions,</p> <p><u>(e) The benefits of increased-density urban intensification.</u></p> <p>(d)(f) Existing and future transport corridors defined and protected, and</p> <p>(e)(g) Integrated transport packages for funding are developed.</p> <p>Explanation</p> <p>Land use and transport systems need to be planned in an integrated manner <u>and support intensification of greenfield and brownfield land. Transport is a key enabler of higher density urban intensification if planned in relation to other enablers like the location of commercial centres, employment areas and areas of high amenity, and community services.</u> Growth management and land use patterns need to support reduced reliance on private motor vehicles and increased accessibility and use of passenger transport, walking and cycling. This can be achieved by planning and providing compact and sustainable urban forms and improving the public transport system.</p> <p><u>In high-growth areas and areas of acute housing need, local authorities should enable increased density urban intensification in locations with good access to infrastructure, employment, services and amenities.</u></p> <p>Table reference: Objective 24, Methods 3 and 18</p>	<p>Support the intent of this policy but request minor amendments for clarification and consistency with the wording used in the NPS-UD itself.</p> <p>Amend clause (b) to include “...a range of transport mode choices to provide access...” to better describe the role of the land transport system.</p>
28	Policy UG 14B	Oppose	<p><u>Restricting urban activities outside urban environments the urban limits – western Bay of Plenty sub-region</u></p> <p>Except as provided for in Policy 7A urban activities shall not be developed outside the urban limits shown on Maps 5 to 15 (Appendix E).</p> <p><u>Restrict the growth of urban activities located outside urban environments unless it can be demonstrated that sound resource management principles are achieved, including:</u></p> <p><u>(a) The efficient development and use of the finite land resource, and</u></p> <p><u>(b) Providing for the efficient, planned and co-ordinated use and development of infrastructure.</u></p> <p><u>Explanation</u></p>	<p>We are concerned that this policy conflicts with proposed Policy UG 7A and the intent of the responsive planning policies described in Policy 8 and Clause 3.8 of the NPS-UD. As worded, the purpose of the policy is unclear and appears to duplicate matters covered elsewhere. We therefore oppose the policy as worded and request its removal. Alternatively, the policy could be substantially reworded to address the issues outlined here.</p> <p>Generally, we are unconvinced this policy is necessary at all, as the matters it covers are dealt with elsewhere. The efficient use of land and infrastructure is already covered by Policy UG 6A, while the co-ordinated use and development of infrastructure is covered by Policy UG 9B and Policy UG 13B (in the case of</p>

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			<p>The location and extent of existing and future urban growth to 2051 is provided for by defined urban limits which cover both the Tauranga City and Western Bay of Plenty District. Within the urban limits shown on Maps 5 to 15, are defined greenfield growth areas for residential development and business use. The urban limits also provide for residential infill and intensification of existing urban areas. The term urban activities is defined to allow for rural and lifestyle activities to occur outside of the urban limits. Methods 14 and 16 provide for a review of the urban limits and amendment where necessary as circumstances change.</p> <p>An appropriate mechanism to manage growth is to provide direction through this Statement on where development may occur. This will enable regional and district plans to give effect to that direction. By confining development within identified areas, development can proceed with certainty while achieving the strategic integration of infrastructure services.</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.</p> <p>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> <p>There may be other provisions in this Regional Policy Statement to consider in proposals to urbanise land which may mean a particular location is unsuitable. These include, but are not limited to, topographical constraints, natural hazards and natural freshwater features.</p> <p>Table reference: Objectives 23, 25 and 26, Methods 1, 3 and 18</p>	<p>transport). Similarly, managing rural development and protecting productive land is covered by Policy UG 18B.</p> <p>In seeking to restrict urban development outside existing urban environments, the policy appears to be re-introducing an urban limit – albeit a soft limit which is not mapped. For example, it is not clear whether an unanticipated or out of sequence plan change which proposed re-zoning an area of rural land directly adjacent to an existing urban area would be able to comply with this policy – or would it be considered urban activities located outside urban environments.</p> <p>Depending on how the definition of urban environment in the NPS-UD is interpreted, this policy may not apply to the situation described above. If this is the case, and the policy is only intended to apply to ad hoc urban development in the wider rural area not associated with an urban environment, or to development of smaller settlements, then it should be re-worded and clarified to be more explicit. However, even if this is the case the need for the policy is still questionable, as Policies UG 6A, UG 9B and UG 13B (referenced above) would still apply and cover the same matters.</p> <p>If the proposal were to be retained in a modified form, refining the application of the policy to consents for activities, rather than plan changes, may also help to clarify the intent. We would also support removal of phrases such as “sound resource management principles” which are vague and do not provide sufficient direction to assess a proposal.</p>
29	Policy UG 15B	Support	<p>Accommodating population growth through greenfield and residential intensification development – western Bay of Plenty sub-region</p> <p>Population growth within the western Bay of Plenty sub-region out to 2051 shall generally be accommodated as follows:</p> <p>(a) By providing for 75% of projected growth within new greenfield development growth areas (e.g., Pāpāmoa East, Ōmokoroa, North-west Bethlehem, Pyes Pa West, To Puke, Katikati and Waihi Beach); and</p> <p>(b) By providing for 25% of projected growth through intensification of residential development within existing urban areas through such techniques as infill development, mixed use zones and specifically identified intensification areas;</p> <p>at densities which aim to achieve the target yields set out in Policy UG 4A.</p> <p>Explanation</p> <p>It is important to make the most efficient use of the available land within the western Bay of Plenty to accommodate expected population growth to 2051, recognising geographical, geotechnical and cultural constraints that prevent urban development in many areas. Research undertaken by the University of Waikato and subsequently Tauranga City Council and Western Bay of Plenty District Council in the development and implementation of the Western Bay of Plenty Sub-region Growth Management Strategy has identified the most appropriate locations for urban development. This has entailed providing for new suburban or greenfield development, while also making efficient use of desirable locations within the existing urban environment of Tauranga City, such as Mount Maunganui and the Tauranga central business district to provide for high density living environments.</p> <p>Monitoring of development trends will enable the split between greenfield and residential intensification to be revised should circumstances change.</p> <p>Table reference: Objective 25, Methods 3, 14 and 16</p>	Support removal of this policy to align with other changes.
30	Policy UG 16B	Support	<p>Providing for new business land – western Bay of Plenty sub-region</p> <p>New large-scale business land shall be provided for generally in accordance with Appendix C and only within the urban limits shown on Maps 5 to 15 (Appendix E).</p> <p>Explanation</p> <p>District Plans provide the key zoning tool for different types of activity. Within the urban limits Western Bay of Plenty District Council and Tauranga City Council need to provide for business land in appropriate locations to meet the economic and social growth needs of the sub-region.</p> <p>Table reference: Objective 25, Methods 3 and 18</p>	Support removal of this policy to align with other changes.

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30	Policy UG 17B	Support	<p>Urban growth management outside of the western Bay of Plenty sub-region</p> <p>Manage the growth of urban areas located outside of the western Bay of Plenty sub-region in a manner consistent with sound resource management principles, including:</p> <p>(a) The efficient development and use of the finite land resource;</p> <p>(b) Setting defined limits of urban development; and</p> <p>(c) Providing for the efficient, planned and co-ordinated use and development of infrastructure.</p> <p>Explanation</p> <p>While areas outside of the western Bay of Plenty sub-region have not been and are unlikely to be faced with the same growth pressures as those recently and currently being experienced in that sub-region, the same overarching growth management principles should apply in other areas. There may however be factors in other areas (such as topographical constraints and natural hazards) which create different challenges and may necessitate variations in the approaches taken.</p> <p><u>Table reference: Objectives 23 and 26, Methods 1, 3 and 18</u></p>	Support removal of this policy to align with other changes.
30	Policy UG 18B	Support with amendments	<p>Managing rural development and protecting versatile land</p> <p>The productive rural land resource shall be protected for rural production activities by ensuring that to the extent practicable subdivision, use and development in rural areas does not result in versatile land being used for non-productive purposes, outside existing and planned urban-zoned areas, or outside the urban limits for the western Bay of Plenty shown in Appendix E, unless it is for:</p> <p>(a) Urban development associated with existing and planned urban areas</p> <p>(b) Regionally significant infrastructure which has a functional, technical or locational need to be located there, <u>or</u></p> <p>(c) it is Urban development that has satisfied the criteria in UG 7A.</p> <p>Particular regard shall be given to whether the proposal will result in a loss of productivity of the rural area, including loss <u>of</u> versatile land, and cumulative impacts that would reduce the potential for food or other primary production.</p> <p>In the catchments of the Rotorua Te Arawa Lakes, land-use change to achieve reduced nutrient losses may justify over-riding this policy. Any such changes in land use must however be integrated and co-ordinated with the provision of appropriate infrastructure.</p> <p>Explanation</p> <p>It is important to protect the natural productivity of the region's land. Soil and its life-supporting capacity are a finite resource, which need to be managed and sustained for future generations. Rural production is one of the region's economic drivers and this production is reliant on retaining and protecting rural land and soils.</p> <p>In areas where rural production activities occur, the protection of finite versatile land primarily for pastoral farming and horticulture is a priority for sustainable management. However, with respect to planned urban development as well as to the legitimate establishment of rural servicing activities in rural areas, it is inevitable that some versatile land will be lost to productive use. The issue then becomes one of ensuring that the extent of such loss is minimised through the efficient use and development of the finite land resource.</p> <p>In the Rotorua Te Arawa Lakes area, protecting water quality from increased nutrient losses may also be given priority over protection of versatile land. Water quality in Rotorua Te Arawa Lakes' catchments has been degraded mainly by human activities and nutrient losses from pastoral farming and sewage leachate from residential areas.</p> <p>Reducing nutrient losses into these lakes is a priority. Rotorua District Council, regional councils, central government and Te Arawa Lakes Trust are working together on a range of initiatives designed to mitigate the effects of nutrients into these lakes.</p> <p>The need to avoid nutrient losses into the receiving waters of some regional catchments at risk may result in rural lifestyle subdivision being a preferred option. However, forward planning and care is needed to prevent the loss of rural character and inefficient land, infrastructure and energy use.</p> <p><u>Table reference: Objective 26, Methods 1, 3, 18, 52 and 67</u></p>	<p>Support the intent of this policy (which is largely a consequential change) but request minor amendments for clarification and consistency with the wording used in the NPS-UD itself.</p> <p>Amend structure of the policy to list the exceptions and improve readability. Remove the use of the word “outside” (which implies a soft urban limit) and improve clarity around development of existing and planned urban areas. In our view this would not change the intent or effect of the policy but make it much clearer and easier to read.</p> <p>We also note that emerging national direction on highly productive land may require revision to this policy and provide further direction for the management of urban development and the productive rural land resource.</p>
31	Policy UG 19B	Support	<p>Providing for rural lifestyle activities —western Bay of Plenty sub-region</p> <p>Require that the productive potential of versatile land is not compromised when providing for rural lifestyle activities outside <u>existing and planned urban areas</u> the urban limits for the western Bay of Plenty shown on Maps 5 to 15 (Appendix E).</p>	Support this consequential change to align with other changes.

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			<p><u>In the catchments of the Rotorua Te Arawa Lakes, land-use change to achieve reduced nutrient losses may justify over-riding this policy. Any such changes in land use must meet the nutrient management rules.</u></p> <p>Explanation</p> <p>Many people across the region (particularly in the western Bay of Plenty sub-region) have chosen to live in rural areas for lifestyle reasons, rather than farming, and this has resulted in fragmentation of productive land through subdivision. In other parts of the region, this pressure may not have been realised as yet and therefore forward planning will prevent these cumulative effects on rural land and versatile land.</p> <p>It is important to protect the natural productivity of land. Soils and their life-supporting capacity are finite resources, which need to be managed and sustained for future generations. Rural production is one of the region's economic drivers and this production is reliant on retaining and protecting its rural land and soils.</p> <p><u>Table reference: Objective 26, Methods 3, 52 and 67</u></p>	
32	Policy UG 20B	Support	<p>Managing reverse sensitivity effects on rural production activities and infrastructure in rural areas</p> <p>Require that subdivision, use and development of rural areas does not compromise or result in reverse sensitivity effects on:</p> <p>(a) Rural production activities, and</p> <p>(b) The operation of infrastructure</p> <p>located beyond the urban limits or existing and planned urban zone areas.</p> <p>Explanation</p> <p>Rural production activities are defined in Appendix A.</p> <p>Geothermal systems are a type of resource that also needs to be protected from incompatible land uses and land use practices.</p> <p>Unplanned rural lifestyle living and fragmentation of rural land through subdivision has occurred in some areas with reverse sensitivity concerns from these new dwellers resulting in associated adverse effects on the productive capacity of the land and its versatility, as well as on the efficient operation and growth of rural production activities. Many of these rural lifestyle lots are in areas that have poor infrastructure.</p> <p>Rural farming and horticultural practices can have effects which may affect the wellbeing of people, including spray drift, noise from frost fans, shading from shelterbelts etc. Similarly, quarrying and mining activities have the potential to create adverse landscape, visual, noise, dust and traffic effects. The potential for some of these activities and their associated practices to be constrained has increased due to the growing number of people choosing to live in rural areas but not work in rural occupations. The cumulative effect of unplanned rural subdivision has in some areas led to inefficient use of physical resources and a gradual loss of rural production activities.</p> <p>Table reference: Objective 26, Methods 3 and 67</p>	Support this consequential change to align with other changes.
33	Policy UG 22B	Support	<p>Providing for papakāinga</p> <p>Outside existing urban areas and the urban limits shown on Maps 5 to 15 (Appendix E), Enable the development of new, and protection of existing, papakāinga including marae based housing shall be provided for.</p> <p>Explanation</p> <p>Māori housing and associated activities around rural marae have been in existence for many decades. Provision is made for accommodating growth through papakāinga development on ancestral land both within and outside of existing and planned urban areas. The utilisation of multiple owned Māori land for housing is the most affordable option for many whanau. In the western Bay of Plenty sub-region papakāinga development is not bound by urban activities being restricted outside the urban limits.</p> <p>The continuation and expansion of papakāinga and other marae based activities, subject to relevant statutory processes, gives effect to the requirements of sections 6(e), 7(a) and 8 of the Act and also recognises the statutory provisions in the Te Ture Whenua Māori Act 1993. This policy provides tangata whenua with the potential to meet their housing and economic development requirements.</p> <p>Table reference: Objectives 16, 21 and 25, Method 3</p>	Support removal of current Policy UG 22B to more broadly reflect the application to te Tiriti o Waitangi principles to local authority decisions on urban development, which go well beyond enabling development of papakāinga.
33	Policy UG 22B	Support with amendments	<p><u>Te Tiriti o Waitangi Principles</u></p> <p><u>Ensure planning decisions provide for te Tiriti o Waitangi principles by:</u></p> <p><u>(a) Enabling Māori to develop their land, including but not limited to papakāinga housing, marae and community facilities;</u></p>	Support full replacement of Policy UG 22B to more broadly reflect the application to te Tiriti o Waitangi principles to local authority decisions on urban development. However, we request minor amendments and clarifications for consistency as follows.

Page No.	Reference	Support/ Oppose	Decision Sought (changes highlighted in yellow with additions underlined , deletions struck-out , and text to be reconsidered highlighted in blue)	Reasons
			<p>(b) Providing for tikanga Māori and opportunities for Māori involvement in Council's decision-making processes, including the preparation of RMA planning documents and Future Development Strategies;</p> <p>(c) <u>Enabling early and ongoing engagement with iwi, hapū and affected Māori land trusts;</u></p> <p>(d) <u>Identifying and protecting culturally significant areas and view shafts</u></p> <p>(e) <u>Protecting marae and papakāinga from incompatible uses or development and reverse sensitivity effects; and</u></p> <p>(f) <u>Demonstrating how Māori values and aspirations identified during consultation in (c) have been recognised and provided for.</u></p> <p>Explanation</p> <p><u>Objective 5 and Policy 9 of the National Policy Statement on Urban Development 2020 seeks to ensure planning decisions relating to urban environments take into account te Tiriti o Waitangi principles and Treaty settlement outcomes. This policy extends those principles to all Maori development. Local authorities must consider iwi and hapū values and aspirations for urban development and provide opportunities for hapū and iwi involvement in decision making.</u></p> <p><u>Policy UG 7BA applies to Māori development where it relates to urban environments and is unanticipated or out of sequence.</u></p> <p><u>The difficulties involved in developing multiple owned Māori land remains a real and significant barrier for many whānau. Loan criteria from lending institutions are stricter then for lending against general title land. Governance structures for Māori land blocks vary and can be difficult to contact and administer. Obtaining formal occupation rights is often time consuming and can generate tension amongst whānau, particularly in relation to those with competing interests.</u></p> <p><u>Local authorities have a role in giving effect to the Crown's Tiriti o Waitangi obligations. Commonly recognised Tiriti o Waitangi principles include but are not limited to partnership, active protection, mutual benefit and rangatiratanga.</u></p> <p><u>One of the means of giving effect to these principles is through methods developed in conjunction with tangata whenua to offset the impacts of urban development on culturally significant values, sites or areas.</u></p> <p><u>Local authorities must also meet their obligations to Māori under other legislation including Te Ture Whenua Māori Act 1993, the Local Government Act 2002, and relevant Treaty settlement legislation.</u></p> <p><u>Opportunities for ensuring tikanga Māori and Māori involvement in decision making processes should be afforded particularly when there are issues or sites of significance to Māori affected. This may involve appointing independent hearing commissioners with Māori cultural expertise or observing kawa (traditional customs) of tangata whenua in a particular area. It could involve holding hearings on marae in proximity to the area of a proposal.</u></p> <p><u>Māori housing and associated activities around marae have been in existence for many decades. Provision is made for accommodating growth through papakāinga development on ancestral land both within and outside of existing and planned urban areas. The utilisation of multiple owned Māori land for housing is the most affordable option for many whānau.</u></p> <p><u>The continuation and expansion of papakāinga and other marae-based activities, subject to relevant statutory processes, gives effect to the requirements of sections 6(e), 7(a) and 8 of the Act and also recognises the statutory provisions in the Te Ture Whenua Māori Act 1993. This policy provides tangata whenua with the potential to meet their housing and economic development requirements.</u></p> <p><u>This policy also seeks to protect marae from reverse sensitivity effects generated by incompatible uses or development occurring in their proximity that could constrain or inhibit cultural activities expected on a marae. Industrial development undertaken around marae that have existed for decades have compromised culturally significant viewshafts and the enjoyment of normal cultural activities. This policy seeks to avoid these outcomes from occurring.</u></p> <p><u>Table reference: Objective 25, Methods 1,2, 3 and 18</u></p>	<p>Correction of reference to Policy “UG 7B” – should be UG 7A.</p> <p>As noted in relation to Policy UG 7A, the explanation to this policy states that Policy UG 7A applies to Māori development where it relates to urban environments and is unanticipated or out of sequence, mirroring a similar statement in Policy UG 7A itself. This would mean that for Tauranga City and Western Bay of Plenty District urban environments, the scale of the development would need to be 5 hectares or more for the responsive planning policies to apply. This large scale may not be feasible in relation to Māori development, and we suggest that this statement is reconsidered to avoid any unintended restrictions on the development of Māori land.</p>
35	Policy UG 24B	Support	<p>Managing reverse sensitivity effects on existing rural production activities in urban areas</p> <p>Manage reverse sensitivity effects on existing rural production activities located within the urban limits of existing and planned urban zoned areas.</p> <p>Explanation</p> <p>Some existing rural production activities are located within <u>existing and planned</u> urban areas or urban limits (as identified in Appendix E). These activities may be impacted by urban expansion and change that may result in reverse sensitivity effects on them.</p> <p><u>Table reference: Objective 26, Methods 3 and 20</u></p>	Support this consequential change to align with other changes.
36	Table 13	N/A	Methods to implement policies.	Comments on methods below should be reflected in Table 13 as appropriate

Page No.	Reference	Support/ Oppose	Decision Sought (changes highlighted in yellow with additions <u>underlined</u> , deletions struck out , and text to be reconsidered highlighted in blue)	Reasons
37	Method 14	Support	Monitor and review growth – western Bay of Plenty sub-region Deleted in full.	Support this consequential change to align with other changes.
37	Method 16	Support	Consider amendments to the urban limits – western Bay of Plenty sub-region Deleted in full.	Support this consequential change to align with other changes.
38	Method 18	Support	Structure plans for land use changes (e) Show how the target yields set out in Policy UG 4A will be met; (o) Show how <u>efficient infrastructure servicing the sequencing of urban growth requirements</u> <u>detailed</u> in Policy UG 6A will be achieved,	Support these consequential changes to align with other changes.
39	Method 67	Support	Support rural structure plans Support the development of rural structure plans for rural areas outside the urban limits or existing and planned urban zone areas that are subject to growth pressure. Implementation: Regional council and city and district councils.	Support this consequential change to align with other changes.
40	Appendix A	Support with amendments	Definitions Terms are not included if they are: <ul style="list-style-type: none"> defined in the Resource Management Act 1991 or other commonly used Acts, the usual dictionary meaning, referred to only in the explanatory text, not the policies, and or <u>referred to in National Policy Statements.</u> Business land: Areas of land used or zoned for commercial or industrial activities and includes areas shown in Appendix C. ... Existing urban area: Those <u>existing developed</u> urban <u>zoned</u> areas <u>reticulated</u> with <u>wastewater and water supply infrastructure</u> that are outside of the greenfield development growth area. Urban limits: The outer extent of the areas (shown on Maps 5 to 15 in Appendix E) which urban activities are located or which are committed for future urban expansion.	The list of criteria for terms not to be included should have “or” rather than “and” – i.e. terms only have to fit one of the criteria, not all of them, to not require definition in the RPS.
41	Appendix C	Support	Indicative growth area timing and business land provision Deleted in full.	Support this consequential change to align with other changes.
43	Appendix D	Support	Indicative growth area sequencing Deleted in full.	Support this consequential change to align with other changes.
45	Appendix E	Support	Management and Growth areas for the western Bay of Plenty Deleted in full.	Support this consequential change to align with other changes.



Submission Form

Send your submission to reach us by
4:00 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: _____

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 / I 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.~~ letter
- 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.]

Date

Contact person: [Name and Designation if applicable]

Name:

Designation:

Telephone:

Daytime:

After Hours:

Email/Fax:

Email:

Fax:

Address for Service of Submitter:

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.

Attachment B

Decision of the respondent

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

COUNCIL DECISION'S VERSION 8.0b

Track Changes

This version shows the changes to Proposed Change 6 (NPS-UD) to the Regional Policy Statement as a result of Council's decisions on submissions and further submissions.

Amendments are show in **red** in this Version 8.0b of Proposed Change 6.
New text is underlined and ~~deleted text is struck through.~~

Bay of Plenty Regional Council
PO Box 364
Whakatāne 3158
New Zealand

Note to Reader (not part of Change)

What this Change does

The following pages are proposed to be amended in the Bay of Plenty Regional Policy Statement. Provisions to be inserted are underlined; provisions to be deleted are ~~struck through~~.

Change 6 note – Policy and method numbers are not shown as updated in Proposed Change 6 (NPS Urban Development). Numbering will be updated when Change 6 becomes operative.

Key terms

For the purpose of this Change the terms defined or otherwise used in the Bay of Plenty Regional Policy Statement apply. For ease of reference these include the following:

Act: Unless the context otherwise requires, “Act” means the Resource Management Act 1991 and any amendments to it.

Anticipated environmental result: An expected effect on the environment of implementing the policies and methods. Because of the complex nature of environmental systems, not all the effects of implementing policies and methods are foreseeable.

Policy: Policies define the boundaries within which decision can be made, and they guide the development of courses of action directed towards the accomplishment of objectives. Policies are guides

The Statement: refers to the Bay of Plenty Regional Policy Statement of which this change will form a part.

Part two

Resource management issues, objectives and summary of policies and methods to achieve the objectives of the Regional Policy Statement

Part two provides an overview of the regionally significant resource management issues, (including the issues of significance to iwi authorities) addressed by the Regional Policy Statement. They are addressed under the topic headings:

- Air quality
- Coastal environment
- Energy and infrastructure
- Geothermal resources
- Integrated resource management
- Iwi resource management
- Matters of national importance
- Natural hazards
- Treaty Co-governance
- Urban and rural growth management
- Water quality and land use
- Water quantity

Each topic includes a summary table showing all the objectives that relate to that topic and the titles of the policies and methods to achieve those objectives. The table also includes a reference to other policies that also need to be considered to gain an overview of the issue across the full scope of the Statement.

2.8 Urban and rural growth management

An overarching framework is necessary to sustainably manage growth in the region to enable development of a sustainable regional urban and rural form.

Accommodating and managing growth can be a challenge, particularly where different parts of the region have distinct needs and pressures. The aim is to manage growth in a planned, sustainable manner while minimising the impact on existing communities and retaining the characteristics and values of the region.

The Statement seeks to direct and maintain compact, well-designed and strongly connected urban areas to effectively and efficiently accommodate growth. This urban form will ensure both urban and rural communities are physically connected and developed in an integrated, planned manner. Applying the region's high-quality urban design and live-work-play principles is an effective means of ensuring good urban form.

Growth is a regional issue because what occurs in one area will invariably have an effect on other places. Employment provided by business parks and residential activity provided by new suburbs or redeveloped established areas will affect the form and function of towns and transportation. Managed growth intervention recognises the actual or potential effects urban growth can have on people and communities, and the important role that efficient infrastructure (e.g., electricity networks, road, rail, ports, airports, drainage, telecommunications, dams, water and wastewater networks) plays in supporting settlement growth and prosperity. Managed growth intervention also supports efficient and effective servicing in a way that does not compromise the operation, maintenance and upgrading of infrastructure.

The protection and development of the region's strategic transport networks and corridors, including on-going connectivity between communities, are essential for sustainable growth. Such an approach will also support the

development of ports, horticulture, agriculture, forestry, quarrying, tourism and future mining, manufacturing and production industries.

The region's key urban areas are:

- Eastern Bay of Plenty: Whakatāne, Ōpōtiki and Kawerau.
- Western Bay of Plenty: Tauranga City, Te Puke, Ōmokoroa, Waihi Beach and Katikati.
- Central Bay of Plenty: Rotorua City.

Between these urban areas are extensive areas of rural land and smaller settlements.

Management of growth and development within rural areas is also important, particularly given the existing and future importance of primary industries (including agriculture, horticulture, forestry, quarrying and mining) to the region's economy. Rural production activities (including associated processing plants and research facilities) contribute to social and economic wellbeing and are dependent on access to and use of natural and physical resources and need to be protected from constraints introduced by incompatible or sensitive activities.

~~The Bay of Plenty's population is steadily growing with the western Bay of Plenty sub-region projected to contain most of the population growth to 2021. Growth in the other districts is not expected to exceed 5% (Statistics New Zealand).~~

The western Bay of Plenty sub-region has determined through its 50-year growth management strategy (SmartGrowth Strategy and Implementation Plan, ~~2007~~ 2013) how the pressures of growth will be best managed in a time, resource and cost-effective manner. The districts of Rotorua, Whakatāne, Ōpōtiki and Kawerau have different pressures. Rotorua and Whakatāne District Councils have undertaken their own urban growth strategies.

~~The management of growth in western Bay of Plenty sub-region has been provided for through policies in this section and through the identification of Growth Management Areas as detailed in Appendices C, D and E. In order to achieve an integrated management approach to urban development in these areas, as required under section 30(1)(a) of the Act, it is appropriate that all relevant objectives and policies shall be considered together to provide for sustainable growth of the sub-region and give effect to this Regional Policy Statement.~~

2.8.1 Regionally significant urban and rural growth management issues

1 Un-coordinated growth and development

Sporadic ~~and~~ un-coordinated ~~and poorly connected~~ growth and development can adversely affect urban and rural amenity values, heritage, health and safety, accessibility, transportation costs, the provision and operation of infrastructure, the use and development of productive rural land and important mineral resources, and access to community, social, employment and commercial facilities.

2 Land supply and inefficient patterns of land use

An imbalance of land supply, demand, and uptake can have adverse economic and social effects, yet it is very difficult to plan and predict. Inefficient ~~and low density~~ patterns of land use and ad hoc development, are difficult and costly to service and maintain, and contribute to increasing greenhouse gas emissions. A shortage of developable land and housing supply reduces housing choices and leads to increases in prices. Unplanned growth and inefficient land use also have the potential to adversely affect rural production activities and to reduce the ability of versatile land to be used for a range of productive purposes.

3 Fragmentation of rural land

Productive rural land (in particular versatile land) is a valuable finite resource on which rural production activities rely. Those activities are in turn significant contributors to the regional and national economies.

Fragmentation of the rural land resource for purposes unrelated to rural production has the potential to constrain or compromise the ability to use such land for a range of productive purposes.

4 Impacts of poor urban design and urban growth on communities

Communities which develop without high quality urban design and appropriate social infrastructure, including that necessary to cater for an aging population, are likely to be less cohesive and to experience reduced amenity. Poor urban design can also lead to reduced physical access and connectivity to facilities and open spaces, and a reduction in people's health and wellbeing. Patterns of urban growth which fail to reflect the aspirations, needs and concerns of existing affected communities are likely to be problematic.

5 Effects of urban and rural subdivision on natural features and landscapes

Urban and rural subdivision patterns create pressures that reduce the values of natural features and landscapes to people and communities.

6 Operation and growth of rural production activities

The continued operation and growth of rural production activities face competition for natural and physical resources and are vulnerable to constraints arising from sensitive or incompatible activities.

7 Conflict between incompatible or sensitive activities and rural production activities in rural areas

The efficient operation and growth of rural production activities in rural areas are at risk from the establishment of sensitive or incompatible non-productive uses (including rural lifestyle activities) through the creation of reverse sensitivity effects which have the potential to unreasonably constrain or inhibit the use and development of, as well as access to, regionally significant natural and physical resources.

compromising the efficient operation of the transport network, if not undertaken in conjunction with well-planned transport improvements.

8 Integration of land use and infrastructure

A lack of integration between land use and infrastructure, including utilities and transport, may result in poor infrastructure investment decisions, public funding pressures and inefficient land-use patterns and may also compromise the operation of existing and proposed transport infrastructure.

9 Intensive urban development

More intensive urban development is necessary to accommodate growth but has the potential to:

- ~~Adversely impact on the residential character and amenity values of existing urban areas~~ Overload network infrastructure including water supply, wastewater and stormwater, as well as creating an unanticipated demand on social infrastructure such as schools and healthcare facilities if not integrated with infrastructure planning and funding decisions.
- Create unforeseen social, economic and cultural effects.
- Increase road congestion leading to restricted movement of goods and services to, from, and within the region, and

Table 8 Urban and rural growth management objectives and titles of policies and methods to achieve the objectives.

Objectives	Policy titles	Page	Method titles	Implementation	Page
Objective 23 A compact, well designed and sustainable urban form that effectively and efficiently accommodates the region's urban growth	Policy UG 7A Providing for unanticipated or out-of-sequence urban growth -urban environments		Method 1: District plan implementation	Tier 1, 2 and 3 city and district councils	
			Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Tier 1, 2 and 3 city and district councils	
			Method 18: Structure plans for land use changes	Tier 1, 2 and 3 city and district councils	
	Policy UG 7Ax: Enable increased-density urban development – urban environments		Method 1: District plan implementation	Tier 1, 2 and 3 city and district councils	
			Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Tier 1, 2 and 3 city and district councils	
			Method 18: Structure plans for land use changes	Tier 1, 2 and 3 city and district councils	
	Policy UG 8B: Implementing high quality urban design and live-work-play principles		Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council, city and district councils	
			Method 4: Bay of Plenty Regional Land Transport Plan implementation	Regional council	
			Method 17: Identify and manage potential effects on infrastructure corridors	Regional council, city and district councils	
			Method 18: Structure plans for land use changes	Regional council, city and district councils	
			Method 58: Investigate and plan for intensification within existing urban areas	City and district councils	
	Policy UG 9B: Co-ordinating new urban development with infrastructure		Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council, city and district councils	
			Method 4: Bay of Plenty Regional Land Transport Plan implementation	Regional council	
			Method 18: Structure plans for land use changes	Regional council, city and district councils	

Objectives	Policy titles	Page	Method titles	Implementation	Page
			Method 19: Provision of infrastructure outside of structure plan areas	Regional council, city and district councils	
			Method 50: Inform transportation strategies and funding	Regional council, city and district councils	
			Method 51: Liaise on cross boundary infrastructure issues	Regional council, city and district councils	
	Policy UG 10B: Rezoning and development of urban land – investment and infrastructure considerations		Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council, city and district councils	
			Method 18: Structure plans for land use changes	Regional council, city and district councils	
	Policy UG 11B: Managing the effects of subdivision, use and development on infrastructure		Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council, city and district councils	
			Method 18: Structure plans for land use changes	Regional council, city and district councils	
			Method 19: Provision of infrastructure outside of structure plan areas	Regional council, city and district councils	
	Policy UG 12B: Providing quality open spaces		Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council, city and district councils	
			Method 67: Support rural structure plans	Regional council, city and district councils	
	Policy UG 17B Urban growth management outside of the western Bay of Plenty sub-region <u>Policy UG 14B Restricting urban activities outside urban environments</u>		Method 1: District plan implementation	City and district councils	
			Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council, city and district councils	
			Method 18: Structure plans for land use changes	Regional council, city and district councils	
Objective 24 An efficient, sustainable, safe and affordable transport network,	Policy UG 1A: Protecting the national and regional strategic transport network		Method 1: District plan implementation	City and district councils	
			Method 4: Bay of Plenty Regional Land Transport Plan implementation	Regional council	
			Method 1: District plan implementation	City and district councils	

Objectives	Policy titles	Page	Method titles	Implementation	Page
integrated with the region's land use patterns	Policy UG 2A: Identifying a consistent road hierarchy		Method 4: Bay of Plenty Regional Land Transport Plan implementation	Regional council	
			Method 13: Develop a roading hierarchy	City and district councils	
	Policy UG 3A: Promoting travel demand management across the region		Method 1: District plan implementation	City and district councils	
			Method 4: Bay of Plenty Regional Land Transport Plan implementation	Regional council	
			Method 17: Identify and manage potential effects on infrastructure corridors	Regional council, city and district councils	
			Method 18: Structure plans for land use changes	Regional council, city and district councils	
			Method 19: Provision of infrastructure outside of structure plan areas	Regional council, city and district councils	
			Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council, city and district councils	
			Method 18: Structure plans for land use changes	Regional council, city and district councils	
Objective 25 <u>Urban</u> subdivision, use and development, in the western Bay of Plenty is located and staged in a way that integrates with the long term planning and funding mechanisms of local authorities, central government agencies and network utility providers and operators whilst <u>also being responsive having regard</u> to the growth plans of relevant industry sector groups <u>and other development entities</u> .	Policy UG 22B: Providing for papakāinga Te Tiriti o Waitangi Principles		<u>Method 1: District plan implementation</u>	<u>City and district councils</u>	
			<u>Method 2: Regional plan implementation</u>	<u>Regional Council</u>	
			Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Tauranga City Council and Western Bay of Plenty District Council City and district councils	
			<u>Method 18: Structure plans for land use changes</u>	<u>Regional council, city and district councils</u>	
	Policy UG 25B: Housing bottom lines – Rotorua and western Bay of Plenty sub-region		Method 1: District plan implementation	City and district councils	
			<u>Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans</u>	<u>Tauranga City Council, Western Bay of Plenty District Council and Rotorua Lakes Council</u>	
			Method 14: Monitor and review growth – western Bay of Plenty sub-region	<u>Regional Council</u>	

Objectives	Policy titles	Page	Method titles	Implementation	Page
			Method 16: Consider amendments to the urban limits—western Bay of Plenty sub-region	Regional Council, city and district councils	
	Policy UG 21B: Provision for utilisation of mineral resources		Method 1: District plan implementation	City and district councils	
			Method 3: Resource consents, notices of requirement and when changing varying or reviewing plans	Tauranga City Council and Western Bay of Plenty District Council	
			Method 52: Provide for the sustainable management of versatile land	Regional council, city and district councils	
			Method 67: Support rural structure plans	Regional council, city and district councils	
	Policy UG 16B: Providing for new business land—western Bay of Plenty sub-region		Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council, Tauranga City Council and Western Bay of Plenty District Council	
			Method 18: Structure plans for land use changes	Regional council, city and district councils	
	Policy UG 15B: Accommodating population growth through greenfield and residential intensification development—western Bay of Plenty sub-region		Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council, Tauranga City Council and Western Bay of Plenty District Council	
			Method 14: Monitor and review growth—western Bay of Plenty sub-region	Regional council	
			Method 16: Consider amendments to the urban limits—western Bay of Plenty sub-region	Regional council, city and district councils	
	Policy UG 14B: Restricting urban activities outside <u>urban environments</u>, the urban limits—western Bay of Plenty sub-region		<u>Method 1: District plan implementation</u>	<u>City and district councils</u>	
			Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council, Tauranga City Council and Western Bay of Plenty District Council <u>City and district councils</u>	
			<u>Method 18: Structure plans for land use changes</u>	<u>Regional council, city and district councils</u>	
	Policy UG 4A: Providing for residential development yields in district plans—western Bay of Plenty sub-region		Method 1: District plan implementation	Tauranga City Council and Western Bay of Plenty District Council	

Objectives	Policy titles	Page	Method titles	Implementation	Page
	Policy UG 6A: Sequencing of Efficient use of land and infrastructure servicing for urban growth and development – western Bay of Plenty sub-region.		Method 1: District plan implementation	Tauranga City Council and Western Bay of Plenty District Council City and district councils	
			Method 18: Structure plans for land use changes	Regional council, Tauranga City Council and Western Bay of Plenty District Council city and district councils	
			Method 50: Inform transportation strategies and funding	Regional council, Tauranga City Council and Western Bay of Plenty District Council	
			Method 51: Liaise on cross boundary infrastructure issues	Regional council, Tauranga City Council and Western Bay of Plenty District Council	
	Policy UG 7A: Providing for the expansion of existing business land – western Bay of Plenty sub-region Policy UG 7A Providing for unanticipated or out-of-sequence urban growth -urban environments		Method 1: District plan implementation	Tauranga City Council and Western Bay of Plenty District Council Tier 1, 2 and 3 city and district councils	
			Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Tier 1, 2 and 3 city and district councils	
			Method 18: Structure plans for land use changes	Tier 1, 2 and 3 city and district councils	
			Method 67: Support rural structure plans	Regional council, Tauranga City Council and Western Bay of Plenty District Council	
	Policy UG 7Ax: Enable increased-density urban development – urban environments		Method 1: District plan implementation	Tier 1, 2 and 3 city and district councils	
			Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Tier 1, 2 and 3 city and district councils	
			Method 18: Structure plans for land use changes	Tier 1, 2 and 3 city and district councils	

Objectives	Policy titles	Page	Method titles	Implementation	Page
	Policy UG 5A: Establishing urban Limits—western Bay of Plenty sub-region		Method 1: District plan implementation	Tauranga City Council and Western Bay of Plenty District Council	
			Method 14: Monitor and review growth—western Bay of Plenty sub-region	Regional council	
			Method 16: Consider amendments to the urban limits—western Bay of Plenty sub-region	Regional council	
Objective 26 The productive potential of the region's rural land resource is sustained and the growth and efficient operation of rural production activities are provided for	Policy UG 17B: Urban growth management outside of the western Bay of Plenty sub-region Policy UG 14B: Restricting urban activities outside <u>urban environments</u> the urban limits—western Bay of Plenty sub-region		Method 1: District plan implementation	City and district councils	
			Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council, city and district councils	
			Method 18: Structure plans for land use changes	Regional council, city and district councils	
	Policy UG 18B: Managing rural development and protecting versatile land		Method 1: District plan implementation	City and district councils	
			Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council, city and district councils	
			Method 18: Structure plans for land use changes	Regional council, city and district councils	
			Method 52: Provide for the sustainable management of versatile land	Regional council, city and district councils	
			Method 67: Support rural structure plans	Regional council, city and district councils	
	Policy UG 23B: Providing for the operation and growth of rural production activities		Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council, city and district councils	
			Method 20: Plan provisions enabling efficient operation and growth of rural production activities.	Regional council, city and district councils	
	Policy UG 19B: Providing for rural lifestyle activities —western Bay of Plenty		Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council, city and district councils	
			Method 52: Provide for the sustainable management of versatile land	Regional council, city and district councils	

Objectives	Policy titles	Page	Method titles	Implementation	Page
			Method 67: Support rural structure plans	Regional council, city and district councils	
	Policy UG 20B: Managing reverse sensitivity effects on rural production activities and infrastructure in rural areas		Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council, city and district councils	
			Method 67: Support rural structure plans	Regional council, city and district councils	
	Policy UG 24B: Managing reverse sensitivity effects on rural production activities in urban areas.		Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council, city and district councils	
			Method 20: Plan provisions enabling efficient operation and growth of rural production activities.	Regional council, city and district councils	
	Policy UG 21B: Provision for utilisation of mineral resources		Method 1: District plan implementation	City and district councils	
			Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council, city and district councils	
			Method 52: Provide for the sustainable management of versatile land	Regional council, city and district councils	
			Method 67: Support rural structure plans	Regional council, city and district councils	
	Policy IR 9B: Taking an integrated approach towards biosecurity		Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council, city and district councils	
	Policy WQ 6B: Ensuring water availability		Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans	Regional council	
			Method 30: Research and monitor water allocation and abstraction	Regional Council	
			Method 32: Prepare and provide information to reduce water demand	Regional Council	

Part three

Policies and methods

Part three presents the policies and methods that, when implemented, will achieve the objectives of this Statement and address the regionally significant resource management issues (including the issues of significance to iwi authorities). The resource management issues and objectives are presented in the previous part two under topic headings.

Part three is divided into two sections. The first contains the policies and the second sets out the methods.

Within the first section, policies are grouped according to the topic under which the policy was originally drafted and are identified as follows:

AQ = Air Quality

CE = Coastal Environment

EI = Energy and Infrastructure

GR = Geothermal Resources

IR = Integrated Resource Management

IW = Iwi Resource Management

MN = Matters of National Importance

NH = Natural Hazards

RR = Rangitāiki River

UG = Urban and Rural Growth Management

WL = Water Quality and Land Use

WQ = Water Quantity

Within these topic groups the letter following the policy number further divides policies into four types as outlined below.

(a) Policies giving direction to regional and district plans

Broad policies that must be given effect by regional or district plans (in accordance with sections 67(3) and 75(3)(c) of the Act) as set out in methods of implementation 1 and 2. These policies are identified by the letter A after the main policy number e.g. CE 3A. NB: while these policies are primarily expressed through plans, in some cases 'A' type policies may also be relevant to the assessment of resource consent applications and notices of requirement. The A policies that must be considered in the assessment of resource consent applications and notices of requirement are listed in Method 3.

(b) Specific directive policies for resource consents, regional and district plans, and notices of requirement.

These policies are identified by the letter B after the main policy number e.g. CE 7B. These are specific policies that:

- must be given effect by regional or district plans (in accordance with sections 67(3)(c) and 75(3)(c) of the Act) as set out in methods of implementation 1 and 2,
- consent authorities must have regard to, where relevant, when considering applications for resource consent and any submissions received (in accordance with section 104(1)(b)(iv) of the Act), and
- territorial authorities must have particular regard to, where relevant, when considering requirements for designations or heritage orders and any submissions received (in accordance with sections 171(1)(a)(iii) and 191(1)(d) of the Act).

NB: in some cases, these policies may also be linked to Methods 1 and/or 2 to ensure they are given effect to as soon as practicable by regional and/or district plans.

(c) Policies that allocate responsibilities

These policies allocate the responsibilities for land-use controls for hazardous substances and indigenous biodiversity between the Bay of Plenty Regional Council and the region's city and district councils. These policies are identified by the letter C after the main policy number e.g. IR 7C.

(d) Guiding policies

These are guiding policies that outline actions to help achieve the objectives. These policies are identified by the letter D after the main policy number e.g. IW 8D.

The second section sets out the methods for implementing the policies. There are two main groups of methods:

- Directive methods to implement policies identified above as either #A, #B, or #C.
- Methods that implement the guiding policies (identified above as #D) or that support the delivery of the other policies.

Directive methods used to implement most policies are Methods 1, 2 and 3. Method 3 requires that policies shall be given effect to when preparing, changing, varying, reviewing or replacing a regional or district plan, and had regard to when considering a resource consent or notice of requirement. While Method 3 is most commonly used to implement 'B' type policies, in some cases (where listed in Method 3) it may be linked to 'A' type policies which are applicable to the assessment of resource consent applications and notices of requirement. Similarly, Methods 1 and/or 2 are primarily used to implement 'A' type policies in regional and district plans but, in some cases, (where listed in Methods 1 and 2) these policies may also be linked to 'B' type policies to ensure they are given effect to as soon as practicable by the relevant plans. The policies linked to and intended to be implemented by Methods 1, 2 and 3 are identified in the beginning of Section 3.2.1 'Directive methods'.

A summary table is provided at the beginning of part three in which the policy titles are provided. The titles serve only as a guide, as the policies are not reproduced in full within the summary table.

In a box following each of the policies, is a cross reference to pertinent objectives and methods. These must be read in association with each policy, to appreciate the relationships between these policies and methods.

3.1 Policies

Table 11 Policy name and page number.

Policy Title	Page No.
Urban and Rural Growth Management	
Broad directive policies for district and regional plans	
Policy UG 1A: Protecting the national and regional strategic transport network	
Policy UG 2A: Identifying a consistent road hierarchy	
Policy UG 3A: Promoting travel demand management across the region	
Policy UG 4A: Providing for residential development yields in district plans – western Bay of Plenty sub-region	
Policy UG 5A: Establishing urban limits – western Bay of Plenty sub-region	
Policy UG 6A: Sequencing of <u>Efficient use of land and infrastructure for</u> urban growth <u>and</u> development – western Bay of Plenty sub-region	
Policy UG 7A: Providing for the expansion of existing business land – western Bay of Plenty sub-region Policy UG 7A <u>Providing for unanticipated or out-of-sequence urban growth - urban environments</u>	
<u>Policy UG 7Ax Enable increased-density urban development – urban environments</u>	
Specific directive policies for plans and consents	
Policy UG 8B: Implementing high quality urban design and live-work-play principles	
Policy UG 9B: Coordinating new urban development with infrastructure	
Policy UG 10B: Rezoning and development of urban land – investment and infrastructure considerations	
Policy UG 11B: Managing the effects of subdivision, use and development on infrastructure	
Policy UG 12B: Providing quality open spaces	
Policy UG 13B: Promoting the integration of land use and transportation	
Policy UG 14B: Restricting urban activities outside <u>urban environments</u> the urban limits – western Bay of Plenty sub-region	
Policy UG 15B: Accommodating population growth through greenfield and residential intensification development – western Bay of Plenty sub-region	
Policy UG 16B: Providing for new business land – western Bay of Plenty sub-region	
Policy UG 17B Urban growth management outside of the western Bay of Plenty sub-region	
Policy UG 18B: Managing rural development and protecting versatile land	
Policy UG 19B: Providing for rural lifestyle activities – western Bay of Plenty sub-region	
Policy UG 20B: Managing reverse sensitivity effects on rural production activities and infrastructure in rural areas	

Policy Title	Page No.
Policy UG 21B: Provision for utilisation of mineral resources	
Policy UG 22B: Providing for papakāinga Te Tiriti o Waitangi Principles	
Policy UG 23B: Providing for the operation and growth of rural production activities	
Policy UG 24B: Managing reverse sensitivity effects on existing rural production activities in urban areas	
Policy UG 25B: Housing bottom lines – Rotorua and western Bay of Plenty sub-region	

Urban and Rural Growth Management Policies

Policy UG 1A: Protecting the national and regional strategic transport network

Identify all existing and proposed nationally or regionally significant transport corridors in the Regional Land Transport Plan and district plans and protect those corridors for regional transport purposes.

Explanation

The protection of the region's strategic transport corridors and networks is essential for achieving integration between land use and transport. The strategic transport network supports the growth and development of both the national and regional economies, particularly in supporting and developing the ports and in terms of providing access to markets for horticulture, agriculture, forestry, quarrying, tourism and future manufacturing and production industries.

Table reference: **Objective 24**, Methods 1 and 4

Policy UG 2A: Identifying a consistent road hierarchy

Identify a consistent road hierarchy including type of road, road function and road definition.

Explanation

The identification of a consistent road hierarchy across the region is essential to the strategic integration of land use and transport planning. This promotes network efficiency by ensuring each road performs the function for which it is designed. Use of a consistent road hierarchy across the region also contributes to road safety, and future integrated land use and transport planning, particularly the planning of safe and efficient bus, cycling and walking routes. It will assist with developing a well connected and sustainable urban form and reduce any cross boundary issues arising from districts having different road types, definitions and functions. As a minimum, the road hierarchy will include strategic, primary and secondary arterials, collector and local roads.

Table reference: **Objective 24**, Methods 1, 4 and 13

Policy UG 3A: Promoting travel demand management across the region

Actively promote travel demand management across the region to:

- (a) Create effective integrated land and travel networks,
- (b) Increase public transport use,
- (c) Address congested transport corridors,
- (d) Reduce use of the private motor vehicle where practicable,
- (e) Encourage the use of alternative renewable transport fuels,
- (f) Reduce emissions from transport, and
- (g) Ensure adequate provision for and increased use of future public transport, walking, cycling networks and corridors, while providing for connectivity.

Explanation

Appropriate policies are required to be included in district plans and the Bay of Plenty Regional Land Transport Plan to actively promote travel demand management.

Land use planning is essential in managing the demand for travel. This could include having higher density/mixed use developments close to good public transport links and community facilities and

employment close to where people live (Appendix B – High quality urban design principles). Additionally, future integration of land use and transport planning will need to take into account the need to design and build transport networks that facilitate walking, cycling and public transport (bus, light rail, etc.). Regard should also be given to the policies and targets of any relevant walking and cycling strategies in the region.

Table reference: **Objective 24**, Methods 1, 4, 18, 17 and 19

~~Policy UG 4A: Providing for residential development yields in district plans – western Bay of Plenty sub-region~~

~~Provide for dwelling yields per hectare of developable land within identified urban areas to be delivered as follows:~~

~~(a) Greenfield urban growth areas~~

~~An average net yield of 12 dwellings or more per hectare from 1 July 2012, rising progressively to 15 dwellings or more per hectare by 1 July 2037.~~

~~(b) Urban intensification areas~~

~~An average net yield of 20 dwellings or more per hectare of developable land within each urban intensification area.~~

Explanation

~~The western Bay of Plenty subregion has a growth management strategy (SmartGrowth) which forms the basis of a number of Urban and Rural Growth Management policies.~~

~~Greenfield development should ultimately deliver 15 dwellings per hectare across the developable land in the entire growth area shown in Appendix C. Development in urban intensification areas should deliver a yield of at least 20 dwellings per hectare within each identified area.~~

~~The policy provides for the yield target for Greenfield urban growth areas to be achieved progressively over time, acknowledging that there may be situations where the ultimate target yield of 15 dwellings per hectare cannot always be achieved.~~

~~For the avoidance of doubt, yields below the stated target achieved prior to 1 July 2037 are not required to be off-set by the achievement of yields greater than the stated target after 1 July 2037.~~

~~The mechanism of how to achieve the target yields through subdivision and land use development is to be provided in the relevant district plan.~~

~~The requirement for new residential development to achieve higher densities than in the past is to promote a more compact urban form and so create vibrant areas for people to live, work and play. Density is important in terms of determining land requirements and influencing urban form.~~

~~Increasing the development densities for greenfield development within the urban limits is a means of restraining urban sprawl and the impact that may have on versatile highly productive land. Achievement of a more compact urban form requires a comprehensive planning approach and the provisions of a mix of housing types to appeal to future residents. This applies particularly to the urban intensification areas where significant redevelopment of existing housing stock is expected to achieve the yield target.~~

~~Increasing dwelling density is recognised internationally as having a number of benefits, including:~~

- ~~1 Increased transport choice and viability of public transport;~~
- ~~2 Reduced environmental impacts from slower urban expansion;~~
- ~~3 Reduced infrastructure costs;~~

~~4 — More walkable neighbourhoods;~~

~~5 — Greater housing choice and affordability.~~

~~Before rezoning land for urban purposes (large scale land use change of 5 hectares or more) councils are required to ensure that structure plans are put in place (see Policy UG 9B and Method 18).~~

~~Table reference: **Objective 25, Method 1**~~

~~Policy UG 5A: Establishing urban limits – western Bay of Plenty sub-region~~

~~Establish urban limits as provided in Appendix E within which urban activities shall occur up to at least 2051.~~

~~Explanation~~

~~In association with the nature of long term urban boundaries provided in Appendix C, Diagram 1 (Appendix D) and Maps 5 to 15 (Appendix E), urban development is enabled with a high degree of long term certainty as to location, yield, sequencing and timing. This assists long term strategic planning and also provides considerable certainty as to the future of land outside the urban limits, providing a strong basis for assuming that such land will have a non-urban future until at least 2051.~~

~~Method 14 (Monitor and review growth) provides a strict but comprehensive methodology on how and when amendments to the urban limits may be made, with an assumption that changes will not be made lightly, and will need to be well justified in terms of the outcomes sought across all the western Bay of Plenty sub-region growth management policies.~~

~~Table reference: **Objective 25, Methods 1, 14 and 16**~~

~~Policy UG 6A: **Sequencing of Efficient use of land and infrastructure for urban growth and development** – western Bay of Plenty sub-region~~

~~Manage urban development within each identified management area in a way that provides for:~~

- ~~(a) The efficient use of land and infrastructure within the immediately preceding growth area stage before the development of the subsequent growth area stage as shown in Appendix C and Appendix D; and~~
- ~~(b) The integration of land use and infrastructure provision.~~
~~(b) Network infrastructure is able to be provided to serve the proposed new growth area, or new infill/intensification areas shown in Appendix C and Appendix D.~~

~~Urban growth area development may proceed in a manner other than sequential growth as per (a) where it can be demonstrated that concurrent development of a subsequent growth area stage will provide more efficient use of land and network infrastructure overall and the conditions in (b) are met.~~

For the purpose of this policy, efficient use of land and infrastructure shall include consideration of the matters referred to in Policy UG 10B.

~~Appendices C and D are indicative guides for the expected timing and sequencing of growth areas.~~

~~Explanation~~

The servicing sequencing (including the provision of access) and timing of urban development ~~within the urban limits for the western Bay of Plenty~~ is critical to achieving integrated and sustainable growth management. ~~Each Large-scale urban growth development (greenfield and brownfield) area in Appendix C and Appendix D and shown on Maps 5 to 15 (Appendix E)~~ must be subject to detailed structure planning to address, among other matters, urban design, and provisions and funding of network infrastructure ~~and funding of that infrastructure.~~

~~Note that the indicative sequencing and time frames are at a level of detail appropriate for this Statement. They are intentionally indicative given the uncertainties inherent in population forecasts.~~

Table reference: **Objective 25, Methods 1, 18, 50 and 51**

~~Policy UG 7A: Providing for the expansion of existing business land – western Bay of Plenty sub-region~~

~~Provide for the expansion of existing business activities or existing zoned business land outside the urban limits shown in Appendix E, only if the proposal will:~~

- ~~(a) For the expansion of existing zoned business land, not be able to be accommodated within existing business zoned land in the western Bay of Plenty sub-region;~~
- ~~(b) Be contiguous with the site of an existing business activity or existing zoned business land;~~
- ~~(c) Not require new connections to urban water supply distribution, stormwater or wastewater infrastructure located within the urban limits;~~
- ~~(d) Avoid, remedy or mitigate effects on rural production activities;~~
- ~~(e) Not compromise access to identified regionally significant aggregate and other mineral resources; and~~
- ~~(f) Not adversely affect existing, consented, designated or programmed regionally significant network utilities and infrastructure.~~

Explanation

~~Restrictions on the expansion of existing business activities and existing zoned business land outside the urban limits are necessary in order to minimise urban expansion and provide for the efficient use of existing infrastructure. The policy presumes that the expansion of existing business activities and existing business zoned areas outside the urban limits will not be allowed unless all of the listed matters are satisfied.~~

~~Table reference: **Objective 25, Methods 1 and 67**~~

Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments

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 add significantly to development capacity based on the extent to which the proposed development satisfies the following criteria:

- (a) The development is of large enough scale to contribute to meeting demand for additional urban land identified through the HBA for the area, including meeting housing bottom lines or meeting needs for specific housing typologies or price points, or business types. Where there is no HBA, there is evidence that there is a need for additional urban land, and
- (b) For Tauranga City and Western Bay of Plenty District urban environments, the development is large scale (5 hectares or more), and sufficient able to support multi modal transport options, and
- (c) For all other urban environments, the development is at a scale commensurate with the size of the urban environment and includes a structure plan for the land use change that meets the requirements of Method 18, and
- (d) The development is located with good accessibility between housing, employment, community and other services and open space, and
- (e) The development is likely to be completed earlier than the anticipated urban development and/or land release sequence, and
- (f) 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.

Explanation

Policy UG 7A implements Policy 8 and Clause 3.8(3) of the National Policy Statement on Urban Development 2020. It requires that the RPS include criteria for determining whether unanticipated or out-of-sequence urban development proposals will add significantly to development capacity.

Clause (b) of this policy does not apply to papakāinga housing, community and social housing, marae and community facilities enabled by Policy UG 22B: Te Tiriti o Waitangi Principles.

This policy applies to Māori urban development enabled by Policy UG 22B: Te Tiriti o Waitangi Principles, where that development is unanticipated or out-of-sequence.

This policy does not apply to small scale alterations to urban environments that have minor effects.

In addition to these criteria the development must be well-connected to existing or planned multi modal transport corridors and must contribute to a well-functioning urban environment.

Unanticipated urban 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 requests, submissions on plan changes and submissions on plan reviews seeking additional greenfield or brownfield urban development. Plan changes and plan reviews initiated by local authorities do not fall within this policy, as they are anticipated.

Where urban development satisfies the criteria, local authorities must respond by removing unnecessary constraints and focusing resources and attention to expedite decision making processes.

These criteria do not negate the requirement for urban development to give effect to the RPS as a whole, including all other relevant objectives and policies, satisfying other criteria, and implementing relevant methods.

Policies UG 6A, 9B, 10B and 11B and Method 18 are particularly relevant to ensure proposals are designed so that infrastructure, including multi-modal transport and three-waters infrastructure, provides for longer-term development

Climate change and natural hazards can have significant impacts on the region's urban growth aspirations and on people, property and infrastructure. Prior to 'live zoning' land for structure planning and development purposes, consideration is to be given to whether a site is significantly constrained by the effects of climate change or natural hazards.

For avoidance of doubt, ~~giving effect to~~ meeting the criteria in Policy UG 7A does 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 Policies IR 5B, UG 10B and UG 11B.

<p><u>Table reference: Objective 23 and 25, Methods 1, 3 and 18</u></p>
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Policy UG 7Ax: Enable increased-density urban development – urban environments

Provide for and enable increased-density urban development in urban environments that:

- (a) Contributes to a well-functioning urban environment,
- (b) Encourages increased density in areas of identified demand, and

(c) Is well-adequately served by existing or planned development infrastructure and public transport.

Explanation

Increasing density of urban development has a number of benefits, including:

- 1 Increased transport choice and viability of public transport
- 2 Reduced environmental impacts from reduced need for urban expansion
- 3 Reduced per unit infrastructure costs
- 4 More walkable neighbourhoods, supporting active transport modes
- 5 Reductions in greenhouse gas emissions
- 6 Greater housing choice and therefore affordability.

Increased density refers to development that is higher density than the existing urban form. Increased density development may not be appropriate in some areas and is relative to different urban environments. City and district plans should enable greater building heights and density where there is high housing and business use and demand.

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 targets and provisions are best set in district or city plans relative to local opportunities and constraints (including infrastructure and transport systems).

This policy does not negate the requirement for increased density urban development to give effect to other relevant provisions in this policy statement and in particular Policy UG 8B Implementing high quality urban design and live-work-play principles set out in Appendix B. Urban development will also be directed by Future Development Strategies, which must achieve well-functioning urban environments in existing and future urban areas. Territorial authorities may develop spatial plans to assist achieving high quality urban design and outcomes.

<p><u>Table reference: Objective 23 and 25,</u> <u>Methods 1, 3 and 18</u></p>
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Policy UG 8B: Implementing high quality urban design and live-work-play principles

Demonstrate adherence to the New Zealand Urban Design Protocol (March 2005) key urban design qualities.

In achieving this, territorial authorities shall implement the region's "high quality urban design" and "live-work-play" principles as outlined in Appendix B, and additionally appropriate social infrastructure necessary to cater for an aging population, and include appropriate policies, methods and other techniques in their district plans and strategies.

This policy shall not apply to land use change (such as rural-residential or lifestyle development) within the rural catchments of the Rotorua lakes where such change will result in a significant reduction in nutrient losses from existing rural land uses.

Explanation

Growth and the development of new and existing urban areas across the region ~~(particularly in the western Bay of Plenty)~~ should apply urban design principles for the development of connected communities, an effective transport system and creating desirable places for people to live, work and play.

The high quality urban design and live-work-play principles are key drivers of sustainable growth management. These principles are considered to be critical tools for ensuring that more intensively developed well-functioning urban environments are achieved, along with high quality urban design.

Table reference: **Objective 23**, Methods 3, 4, 17, 18 and 58

Policy UG 9B: Co-ordinating new urban development with infrastructure

Ensure there is co-ordination between:

- (a) The urban form and layout, location, timing and sequencing of new urban development; and
- (b) The development, funding, implementation and operation of transport and other infrastructure serving the area in question,

so that all infrastructure required to serve new development is available, or is consented, designated or programmed to be available prior to development occurring.

~~For Tauranga City and Western Bay of Plenty District only, in satisfying this policy, regard must be had to the indicative growth area timing shown in Appendix C.~~

Explanation

~~Region-wide:~~

The policy gives effect to the statutory requirement of regional councils under section 30(1)(gb) of the Act to provide for the strategic integration of land use and infrastructure.

Territorial authorities and most network utility operators plan and budget the provision of services many years in advance of their delivery. When constructed, these works (roads, sewers, water supply, stormwater systems, reserves and other community facilities) need to be used in order to recoup the costs of their provision. Therefore, it is important that before new urban development within or outside of existing or future urban areas is proposed, there is certainty that the infrastructure necessary to service such development will actually be available when required. The efficient and effective operation of regionally significant network utility services that traverse areas of urban growth, but that do not necessarily serve them directly must also be considered. Where appropriate, local authorities should also encourage the co-ordination and co-location of works between network utility operators to minimise environmental and amenity impacts and community concern and disruption.

~~Western Bay of Plenty sub-region:~~

Any ~~urban growth and development within a growth area including an intensification area~~ must recognise the impact of growth on existing infrastructure and provide an equitable funding mechanism for the costs of that infrastructure. Other contributions (e.g., recognising the costs and benefits of public transport) towards achieving environmental sustainability in new developments can be estimated and funding sources determined at the national, regional, city and district levels as part of 10-yearly, three yearly and annual budgeting cycles.

Table reference: **Objective 23**, Methods 3, 4, 18, 19, 50 and 51

Policy UG 10B: Rezoning and development of urban land – investment and infrastructure considerations

Require the rezoning or other provisions for the urban development of land to take into account:

- (a) Sustainable rates of land uptake,
- (b) Existing or committed public and private sector investments in urban land development and infrastructure,
- (c) Sustainable provision and funding of existing and future infrastructure, and
- (d) Efficient use of local authority and central government financial resources, including prudent local authority debt management.

Explanation

Because commitments to and investments in urban land use and servicing are often made 20 or more years in advance of delivery, there is potential for both local authority policy changes and ad hoc private market development decisions to result in significant adverse social and economic effects. Policies to address timing and sequencing of development should therefore be designed to ensure, within broad limits, that development proceeds in a way that gives infrastructure service providers time to match demand, and the ability to fund that service delivery. The overall purpose is to provide a broad framework that signals to the market the importance of integrating public and private development decisions.

The focus of Policy UG 10B is on broad investment and infrastructure considerations. More detailed matters are the subject of other RPS policies, for example Policies WQ 6B, WQ 7B and WQ 8B which specifically address water efficiency.

Table reference: **Objective 23**, Methods 3 and 18

Policy UG 11B: Managing the effects of subdivision, use and development on infrastructure

Manage the design and location of subdivision, use, and development to address potential adverse effects on the operation and upgrading of existing, consented, designated or programmed infrastructure.

Explanation

The planning and co-ordination of urban development and infrastructure needs to be carefully managed to ensure that potential adverse effects, including reverse sensitivity effects, and effects generated by demand as well as by physical development, are appropriately avoided, remedied or mitigated.

Table reference: **Objective 23**, Methods 3, 18 and 19

Policy UG 12B: Providing quality open spaces

Provide for open space across the region as a primary consideration in growth management, including urban form and design, to ensure people and communities have access to a variety of quality open space experiences to the extent practicable, having regard to the following factors:

- (a) Open spaces are managed in an integrated and co-ordinated manner to enable improvements to existing open space networks,
- (b) People in urban areas, particularly those with disabilities and reduced mobility, have equitable access to safe open spaces for amenity, sport and recreation close to where they live and work,
- (c) Areas of growth and intensification provide for usable open space for a range of purposes,
- (d) Alternative walking and cycling routes are provided that enable avoidance of safety hazards on high speed congested road corridors,
- (e) Open spaces are linked, including to extend the open space network and to improve proximity and access to natural habitats,
- (f) Over time access to and along the coastal edge and the margins of lakes and rivers is enhanced through connecting and acquiring public reserves and open spaces, and
- (g) Open space areas are accessible to a range of transport modes.

Explanation

It is important that open spaces are planned and provided for people of all ages with different physical and recreational needs. Open spaces can include larger conservation areas and coastal reserves, as well as neighbourhood and regional parks. Accessibility should be a key consideration in growth management,

including high quality urban design. To ensure all members of the community can enjoy equal use of open spaces, access should not be reliant on cars and be able to be used by people with disabilities and limited mobility.

Table reference: **Objective 23**, Methods 3 and 67

Policy UG 13B: Promoting the integration of land use and transportation

In promoting the integration of land-use and transport activities, regard should be given to:

- (a) Land use and transport planning being closely linked,
- (b) The land transport system providing opportunities and integrated links for both public and private transportation modes,
- (c) Proximity to commercial centres, places of employment, community services and areas of high amenity are considered in transport planning to support higher density development,
- ~~(d)~~ (d) Travel Demand management is considered in planning, design and transport investment decisions,
- (e) The benefits of increased-density urban intensification,
- ~~(f)~~ (f) Existing and future transport corridors defined and protected, and
- ~~(g)~~ (g) Integrated transport packages for funding are developed.

Explanation

Land use and transport systems need to be planned in an integrated manner and support intensification of greenfield and brownfield land. Transport is a key enabler of higher density urban intensification if planned in relation to other enablers like the location of commercial centres, employment areas and areas of high amenity, and community services. Growth management and land use patterns need to support reduced reliance on private motor vehicles and increased accessibility and use of passenger transport, walking and cycling. This can be achieved by planning and providing compact and sustainable urban forms and improving the public transport system.

In high-growth areas and areas of acute housing need, local authorities should enable increased density urban intensification in locations with good access to infrastructure, employment, services and amenities.

Table reference: **Objective 24**, Methods 3 and 18

Policy UG 14B: Restricting urban activities outside urban environments ~~the urban limits – western Bay of Plenty sub-region~~

~~Except as provided for in Policy 7A urban activities shall not be developed outside the urban limits shown on Maps 5 to 15 (Appendix E).~~

Restrict the growth of urban activities located outside urban environments unless it can be demonstrated that sound resource management principles are achieved, including:

- (a) The efficient development and use of the finite land resource, and
- (b) Providing for the efficient, planned and co-ordinated use and development of infrastructure.

Explanation

~~The location and extent of existing and future urban growth to 2051 is provided for by defined urban limits which cover both the Tauranga City and Western Bay of Plenty District. Within the urban limits shown on Maps 5 to 15, are defined greenfield growth areas for residential development and business use. The urban limits also provide for residential infill and intensification of existing urban areas. The term urban activities is~~

~~defined to allow for rural and lifestyle activities to occur outside of the urban limits. Methods 14 and 16 provide for a review of the urban limits and amendment where necessary as circumstances change.~~

~~An appropriate mechanism to manage growth is to provide direction through this Statement on where development may occur. This will enable regional and district plans to give effect to that direction. By confining development within identified areas, development can proceed with certainty while achieving the strategic integration of infrastructure services.~~

~~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.~~

~~There may be other provisions in this Regional Policy Statement to consider in proposals to urbanise land which may mean a particular location is unsuitable. These include, but are not limited to, topographical constraints, natural hazards and natural freshwater features.~~

<p>Table reference: Objectives 23, 25 and 26, Methods 1, 3 and 18</p>
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~~Policy UG 15B: Accommodating population growth through greenfield and residential intensification development – western Bay of Plenty sub-region~~

~~Population growth within the western Bay of Plenty sub-region out to 2051 shall generally be accommodated as follows:~~

- ~~(a) By providing for 75% of projected growth within new greenfield development growth areas (e.g., Pāpāmoa East, Ōmokoroa, North-west Bethlehem, Pyes Pa West, Te Puke, Katikati and Waihi Beach); and~~
- ~~(b) By providing for 25% of projected growth through intensification of residential development within existing urban areas through such techniques as infill development, mixed use zones and specifically identified intensification areas;~~

~~at densities which aim to achieve the target yields set out in Policy UG 4A.~~

Explanation

It is important to make the most efficient use of the available land within the western Bay of Plenty to accommodate expected population growth to 2051, recognising geographical, geotechnical and cultural constraints that prevent urban development in many areas. Research undertaken by the University of Waikato and subsequently Tauranga City Council and Western Bay of Plenty District Council in the development and implementation of the Western Bay of Plenty Sub-region Growth Management Strategy has identified the most appropriate locations for urban development. This has entailed providing for new suburban or greenfield development, while also making efficient use of desirable locations within the existing urban environment of Tauranga City, such as Mount Maunganui and the Tauranga central business district to provide for high density living environments.

Monitoring of development trends will enable the split between greenfield and residential intensification to be revised should circumstances change.

~~Table reference: **Objective 25**, Methods 3, 14 and 16~~

~~Policy UG 16B: Providing for new business land – western Bay of Plenty sub-region~~

~~New large-scale business land shall be provided for generally in accordance with Appendix C and only within the urban limits shown on Maps 5 to 15 (Appendix E).~~

~~Explanation~~

~~District Plans provide the key zoning tool for different types of activity. Within the urban limits Western Bay of Plenty District Council and Tauranga City Council need to provide for business land in appropriate locations to meet the economic and social growth needs of the sub-region.~~

~~Table reference: **Objective 25**, Methods 3 and 18~~

~~Policy UG 17B: Urban growth management outside of the western Bay of Plenty sub-region~~

~~Manage the growth of urban areas located outside of the western Bay of Plenty sub-region in a manner consistent with sound resource management principles, including:~~

- ~~(a) — The efficient development and use of the finite land resource;~~
- ~~(b) — Setting defined limits of urban development; and~~
- ~~(c) — Providing for the efficient, planned and co-ordinated use and development of infrastructure.~~

~~Explanation~~

~~While areas outside of the western Bay of Plenty sub-region have not been and are unlikely to be faced with the same growth pressures as those recently and currently being experienced in that sub-region, the same overarching growth management principles should apply in other areas. There may however be factors in other areas (such as topographical constraints and natural hazards) which create different challenges and may necessitate variations in the approaches taken.~~

~~Table reference: **Objectives 23 and 26**, Methods 1, 3 and 18~~

Policy UG 18B: Managing rural development and protecting versatile land

The productive rural land resource shall be protected for rural production activities by ensuring that to the extent practicable subdivision, use and development in rural areas does not result in versatile land being used for non-productive purposes outside existing and planned urban-zoned areas, ~~or outside the urban limits for the western Bay of Plenty shown in Appendix E~~, unless it is for regionally significant infrastructure which has a functional, technical or locational need to be located there, or it is urban development that has satisfied the criteria in Policy UG 7A.

Particular regard shall be given to whether the proposal will result in a loss of productivity of the rural area, including loss of versatile land, and cumulative impacts that would reduce the potential for food or other primary production.

In the catchments of the Rotorua Te Arawa Lakes, land-use change to achieve reduced nutrient losses may justify over-riding this policy. Any such changes in land use must however be integrated and co-ordinated with the provision of appropriate infrastructure.

Explanation

It is important to protect the natural productivity of the region's land. Soil and its life-supporting capacity are a finite resource, which need to be managed and sustained for future generations. Rural production is one of the region's economic drivers and this production is reliant on retaining and protecting rural land and soils.

In areas where rural production activities occur, the protection of finite versatile land primarily for pastoral farming and horticulture is a priority for sustainable management. However, with respect to planned urban development as well as to the legitimate establishment of rural servicing activities in rural areas, it is inevitable that some versatile land will be lost to productive use. The issue then becomes one of ensuring that the extent of such loss is minimised through the efficient use and development of the finite land resource.

In the Rotorua Te Arawa Lakes area, protecting water quality from increased nutrient losses may also be given priority over protection of versatile land. Water quality in Rotorua Te Arawa Lakes' catchments has been degraded mainly by human activities and nutrient losses from pastoral farming and sewage leachate from residential areas.

Reducing nutrient losses into these lakes is a priority. Rotorua District Council, regional councils, central government and Te Arawa Lakes Trust are working together on a range of initiatives designed to mitigate the effects of nutrients into these lakes.

The need to avoid nutrient losses into the receiving waters of some regional catchments at risk may result in rural lifestyle subdivision being a preferred option. However, forward planning and care is needed to prevent the loss of rural character and inefficient land, infrastructure and energy use.

Table reference: **Objective 26**, Methods 1, 3, 18, 52 and 67

Policy UG 19B: Providing for rural lifestyle activities – ~~western Bay of Plenty sub-region~~

Require that the productive potential of versatile land is not compromised when providing for rural lifestyle activities outside existing and planned urban areas. ~~the urban limits for the western Bay of Plenty shown on Maps 5 to 15 (Appendix E).~~

In the catchments of the Rotorua Te Arawa Lakes, land-use change to achieve reduced nutrient losses may justify over-riding this policy. Any such changes in land use must meet the nutrient management rules.

Explanation

Many people across the region (particularly in the western Bay of Plenty sub-region) have chosen to live in rural areas for lifestyle reasons, rather than farming, and this has resulted in fragmentation of productive land through subdivision. In other parts of the region, this pressure may not have been realised as yet and therefore forward planning will prevent these cumulative effects on rural land and versatile land.

It is important to protect the natural productivity of land. Soils and their life-supporting capacity are finite resources, which need to be managed and sustained for future generations. Rural production is one of the region's economic drivers and this production is reliant on retaining and protecting its rural land and soils.

Table reference: **Objective 26**, Methods 3, 52 and 67

Policy UG 20B: Managing reverse sensitivity effects on rural production activities and infrastructure in rural areas

Require that subdivision, use and development of rural areas does not compromise or result in reverse sensitivity effects on:

- (a) Rural production activities, and
- (b) The operation of infrastructure

located beyond ~~the urban limits of~~ existing and planned urban ~~zone~~ areas.

Explanation

Rural production activities are defined in Appendix A.

Geothermal systems are a type of resource that also needs to be protected from incompatible land uses and land use practices.

Unplanned rural lifestyle living and fragmentation of rural land through subdivision has occurred in some areas with reverse sensitivity concerns from these new dwellers resulting in associated adverse effects on the productive capacity of the land and its versatility, as well as on the efficient operation and growth of rural production activities. Many of these rural lifestyle lots are in areas that have poor infrastructure.

Rural farming and horticultural practices can have effects which may affect the wellbeing of people, including spray drift, noise from frost fans, shading from shelterbelts etc. Similarly, quarrying and mining activities have the potential to create adverse landscape, visual, noise, dust and traffic effects. The potential for some of these activities and their associated practices to be constrained has increased due to the growing number of people choosing to live in rural areas but not work in rural occupations. The cumulative effect of unplanned rural subdivision has in some areas led to inefficient use of physical resources and a gradual loss of rural production activities.

*Table reference: **Objective 26**, Methods 3 and 67*

Policy UG 21B: Provision for utilisation of mineral resources

Protect:

- (a) Existing mineral extraction sites and access routes to these sites from reverse sensitivity effects arising from incompatible activities; and
- (b) Access to undeveloped areas of known high value mineral resources, including aggregate, and the present and future availability of mineral extraction from them that may arise from incompatible activities.

Explanation

The Bay of Plenty region contains mineral resources essential for the region's continued economic growth and development. Incompatible activities establishing over or in close proximity to areas of known high value mineral resources and the access routes to them can adversely impact on their future accessibility and use. Examples of such activities include urban expansion and sporadic residential development in rural areas.

*Table reference: **Objectives 25 and 26**, Methods 1, 3, 52 and 67*

Policy UG 22B: ~~Providing for papakāinga~~

~~Outside existing urban areas and the urban limits shown on Maps 5 to 15 (Appendix E), Enable the development of new, and protection of existing, papakāinga including marae-based housing shall be provided for.~~

Explanation

~~Māori housing and associated activities around rural marae have been in existence for many decades. Provision is made for accommodating growth through papakāinga development on ancestral land both within and outside of existing and planned urban areas. The utilisation of multiple owned Māori land for housing is the most affordable option for many whānau. In the western Bay of Plenty sub-region papakāinga development is not bound by urban activities being restricted outside the urban limits.~~

~~The continuation and expansion of papakāinga and other marae-based activities, subject to relevant statutory processes, gives effect to the requirements of sections 6(e), 7(a) and 8 of the Act and also recognises the statutory provisions in the Te Ture Whenua Māori Act 1993. This policy provides tangata whenua with the potential to meet their housing and economic development requirements.~~

*Table reference: **Objectives 16, 21 and 25,**
Method 3*

Policy UG 22B: Te Tiriti o Waitangi Principles

Ensure planning decisions provide for te Tiriti o Waitangi principles by:

- (a) Enabling Māori to develop their land, including but not limited to papakāinga housing, community and social housing, marae and community facilities;
- (b) Providing for tikanga Māori and opportunities for Māori involvement in Council's decision-making processes, including the preparation of RMA planning documents and Future Development Strategies, and in appropriate circumstances decision making on resource consents, designations and heritage orders;
- (c) Enabling early and ongoing engagement with iwi, hapū and affected Māori land trusts;
- (d) Identifying and protecting culturally significant areas and view shafts
- (e) Protecting marae and papakāinga from adverse effects of new or expanded subdivision, use or development that constrain their continued use ~~incompatible uses or development and reverse sensitivity effects;~~ and
- (f) Demonstrating how Māori values and aspirations identified during consultation in (c) have been recognised and provided for.

Explanation

Objective 5 and Policy 9 of the National Policy Statement on Urban Development 2020 seeks to ensure planning decisions relating to urban environments take into account te Tiriti o Waitangi principles and Treaty settlement outcomes. This policy extends those principles to all Māori development. Local authorities must consider iwi and hapū values and aspirations for urban development and provide opportunities for hapū and iwi involvement in decision making.

Policy UG 7AB applies to Māori development where it relates to urban environments and is unanticipated or out of sequence; but does not apply to papakāinga housing, community and social housing, marae and community facilities.

The difficulties involved in developing multiple owned Māori land remains a real and significant barrier for many whānau. Loan criteria from lending institutions are stricter ~~then~~ than for lending against general title land. Governance structures for Māori land blocks vary and can be difficult to contact and administer. Obtaining formal occupation rights is often time consuming and can generate tension amongst whānau, particularly in relation to those with competing interests.

Local authorities have a role in giving effect to the Crown's Tiriti o Waitangi obligations. Commonly recognised Tiriti o Waitangi principles include but are not limited to partnership, active protection, mutual benefit and rangatiratanga.

One of the means of giving effect to these principles is through methods developed in conjunction with tangata whenua to offset the impacts of urban development on culturally significant values, sites or areas.

Local authorities must also meet their obligations to Māori under other legislation including Te Ture Whenua Māori Act 1993, the Local Government Act 2002, and relevant Treaty settlement legislation.

Opportunities for ensuring tikanga Māori and Māori involvement in decision making processes should be afforded particularly when there are issues or sites of significance to Māori affected. This may involve appointing independent hearing commissioners with Māori cultural expertise or observing kawa (traditional customs) of tangata whenua in a particular area. It could involve holding hearings on marae in proximity to the area of a proposal.

Māori housing and associated activities around marae have been in existence for many decades. Provision is made for accommodating growth through papakāinga development on ancestral land both within and outside of existing and planned urban areas. The utilisation of multiple owned Māori land for housing is the most affordable option for many whānau.

The continuation and expansion of papakāinga and other marae-based activities, subject to relevant statutory processes, gives effect to the requirements of sections 6(e), 7(a) and 8 of the Act and also recognises the statutory provisions in the Te Ture Whenua Māori Act 1993. This policy provides tangata whenua with the potential to meet their housing and economic development requirements.

This policy also seeks to protect marae and papakāinga from adverse effects of new or expanded subdivision, use or development ~~reverse sensitivity effects generated by incompatible uses or development occurring in their proximity~~ that could constrain or inhibit cultural activities expected on a marae. Industrial development undertaken around marae that have existed for decades have compromised culturally significant viewshafts and the enjoyment of normal cultural activities. This policy seeks to avoid these outcomes from occurring in future, or from being exacerbated.

<p><u>Table reference: Objective 25, Methods 1,2, 3 and 18</u></p>

Policy UG 23B: Providing for the operation and growth of rural production activities

In providing for the operation and growth of rural production activities, regard should be had to:

- (a) Appropriate plan provisions, including zoning of land,
- (b) Access to and use of resources,
- (c) Transportation and infrastructure requirements, and
- (d) Protection from reverse sensitivity effects.

Explanation

The operation and growth of rural production activities in the Bay of Plenty is important to the region's economy. The use of and access to natural resources (such as land, minerals, soil and water), or physical resources (such as transportation infrastructure) are important factors in providing for the operation and growth of these activities.

Rural production activities often have particular locational and functional requirements in terms of access to resources, relationship to support facilities and the management of environmental effects. It is therefore important that resource use is managed in a manner which recognises and provides for those locational and functional requirements.

Table reference: **Objective 26**, Methods 3 and 20

Policy UG 24B: Managing reverse sensitivity effects on existing rural production activities in urban areas

Manage reverse sensitivity effects on existing rural production activities located within ~~the urban limits of~~ existing and planned urban zoned areas.

Explanation

Some existing rural production activities are located within existing and planned urban areas ~~or urban limits (as identified in Appendix E)~~. These activities may be impacted by urban expansion and change that may result in reverse sensitivity effects on them.

Table reference: **Objective 26, Methods 3 and 20**

Policy UG 25B: Housing bottom lines – Rotorua and western Bay of Plenty sub-region

Provide housing bottom lines for the short-medium term and long term in Rotorua and the western Bay of Plenty sub-region as set out in the table below:

Geographical Area	Housing bottom line		
	Short-medium term 2020-2030 <u>2022-2032</u>	Long-term 2030-2050 <u>2032-2052</u>	30 Year Total 2020-2050 <u>2022-2052</u> additional
Tauranga City	13,800	17,300 <u>20,090</u>	31,100 <u>33,890</u>
Western Bay of Plenty District	4,600 <u>5,530</u>	2,900 <u>3,570</u>	7,500 <u>9,100</u>
Total for western Bay sub-region	18,400 <u>19,330</u>	20,200 <u>23,660</u>	38,600 <u>42,990</u>
Rotorua	6,240	3,500	9,740

Explanation

The National Policy Statement on Urban Development 2020 (NPS-UD) requires short-medium term and long term housing bottom lines to be set for Rotorua and the western Bay of Plenty sub-region urban environments.

The term 'housing bottom lines' means the development capacity that is sufficient to meet expected housing demand plus the appropriate competitiveness margin. The competitiveness margins for both housing and business land are 20% for the short and medium terms and 15% for the long term. The short-medium term means the next 10 years, and the long term means between 10 and 30 years.

These housing bottom lines represent the development that Rotorua Lakes Council, Tauranga City Council and Western Bay of Plenty District Council shall enable through their district plans, structure plans, growth and infrastructure strategies.

Housing bottom lines are the amount of feasible, reasonably expected to be realised development capacity that must be enabled to meet demand, along with a competitiveness margin.

Housing bottom lines should be identified in relevant plans and strategies, and the development infrastructure required to service it must be identified in the relevant Infrastructure Strategy required under the Local Government Act 2002.

Table reference: **Objective 25, Methods 1 and 3**

3.2 Methods to implement policies

This section contains the methods for implementing the policies set out in section 3.1. It is divided into two main groups of methods: directive methods and guiding methods to implement the policies.

Under each method the key organisations who will implement the methods are identified. An asterisk * indicates the lead authority responsible for implementation, if this is designated. The delivery and timing of methods is subject to long-term council community planning and annual plan schedules.

Within section 3.2 the methods are presented in numeric order, although in the summary table below, methods are listed under key topics.

Table 13 *Methods to implement policies.*

Section 3.2: Methods to implement policies		Page
3.2.1: Directive methods		
Method 1: District plan implementation		
Method 3: Resource consents, notices of requirement and when changing, varying, reviewing or replacing plans		
Method 4: Bay of Plenty Regional Land Transport Plan implementation		
Method 13: Develop a roading hierarchy		
Method 14: Monitor and review growth—western Bay of Plenty sub-region		
Method 16: Consider amendments to the urban limits—western Bay of Plenty sub-region		
Method 17: Identify and manage potential effects on infrastructure corridors		
Method 18: Structure plans for land use changes		
Method 19: Provision of infrastructure outside of structure plan areas		
Method 20: Plan provisions enabling efficient operation and growth of rural production activities		
3.2.1: Directive methods		
Method 67: Support rural structure plans		

3.2.1 Directive methods

Change 6 note – only those Methods that are amended, deleted or added are shown. All other Methods are not changed.

Method 14: Monitor and review growth – western Bay of Plenty sub-region

Growth patterns within the western Bay of Plenty sub-region shall be regularly monitored and this Statement's provisions relating to urban and rural growth management shall be reviewed in the event that monitoring shows that actual sub-regional growth patterns are or are likely to be such as to render the growth strategy (see Section 2.8) inappropriate. Other triggers for review shall include the occurrence of any one of the following:

- (a) — The population predictions in Figure 9 of the Western Bay of Plenty sub-region Growth Management Strategy (3 May 2004) vary by more than 10% from actual Census figures for all of the growth for the relevant Census period;
- (b) — It can be demonstrated that insufficient land exists within all of the Urban Limits shown on Maps 5 to 15 (Appendix E of this document) to cater for growth anticipated to occur within 10 years of the analysis;
- (c) — It can be demonstrated that exceptional circumstances have arisen in one or more of the management areas shown on Maps 5 to 15 (Appendix E) and a review is necessary to achieve the objectives of this part of the Statement;
- (d) — Any review of the Western Bay of Plenty Sub-region Growth Management Strategy amends the strategy to the extent that the urban and rural growth management objectives, policies and methods are in conflict; and
- (e) — As a result of Method 15 an amendments is required.

Implementation responsibility: Regional council, city and district councils.

Method 16: Consider amendments to the urban limits – western Bay of Plenty sub-region

Amendments to the urban limits shown on Maps 5 to 15 (Appendix E) will be considered only where they:

- (a) — Promote and do not compromise an integrated and sustainable use of infrastructure and services and community facilities such as schools, libraries and public open space;
- (b) — Do not compromise the implementation of the development strategy described in Policy UG 4A;
- (c) — Are consistent with the purpose and principles of the Act;
- (d) — Do not adversely affect marae or papakāinga areas nearby;
- (e) — Meet the review conditions of Method 14 for the subject area;
- (f) — Are triggered by a situation where there is insufficient development capacity in other parts of the sub-region;
- (g) — Are prompted by a situation where the development strategy prescribed in Policy UG 4A has failed in its intended purpose; and
- (h) — Reflect territorial authority decisions on plan changes or structure plans that require minor amendments to the urban limits line.

Implementation responsibility: Regional council

Method 18: Structure plans for land use changes

Prepare structure plans for all large-scale land use changes to ensure:

- Coordinated development through the integrated provision of infrastructure; and
- Integrated management of related environmental effects.

Structure plans shall, as appropriate and applicable:

- (a) Identify land which is to be used or developed for urban purposes,
 - (b) Identify intensification areas,
 - (c) Show proposed land uses, including:
 - (i) Arterial and collector roads, rail and network infrastructure
 - (ii) Residential, commercial and business centres
 - (iii) Schools
 - (iv) Parks
 - (v) Land required for recreation
 - (vi) Land to be reserved or otherwise set aside from development for environmental protection purposes
 - (vii) Appropriate infrastructure corridors
 - (i) Community, health and social service facilities, including those necessary to cater for an ageing population.
 - (d) In respect of proposed land uses (see (c) above), demonstrate the live-work-play principle to development,
 - (e) ~~Show how the target yields set out in Policy UG 4A will be met;~~
 - (f) Identify all existing and consented, designated or programmed infrastructure and infrastructure corridors,
 - (g) Identify infrastructure requirements, including the provision of and responsibility for that infrastructure,
 - (h) Identify all known contaminated sites that land to be used for urban purposes may contain and show how adverse effects from contaminated land are to be avoided, remedied or mitigated,
 - (ha) Identify all known natural hazards that land to be used for urban purposes may be subject to, or contain, and show how low natural hazard risk is to be maintained or achieved,
 - (i) Identify significant cultural, natural and historic heritage features and values and show how they are to be protected,
 - (j) Identify significant view shafts to be maintained and enhanced through the avoidance of inappropriate development,
 - (k) Show how any adverse effect of increased stormwater runoff is to be mitigated,
 - (l) Show how other adverse effects on the environment and infrastructure are to be avoided, remedied or mitigated,
 - (m) Show how provision has been made for public transport, cycleways and pedestrian connections,
 - (n) Document consultation undertaken with persons (including tangata whenua) affected by or interested in the proposed land uses, and any response to the views of those consulted,
 - (o) Show how ~~efficient infrastructure servicing the sequencing of urban growth requirements detailed in~~ Policy UG 6A will be achieved,
 - (p) Include Urban Design Plans which:
 - (i) Apply and demonstrate adherence to the New Zealand Urban Design Protocol (March 2005) Key Urban Design Qualities,
 - (ii) Outline the urban design objective and rationale,
 - (iii) Provide an analysis of context,
 - (iv) Provide a site analysis, and
 - (v) State design outcomes for the proposed development.
- “As appropriate and applicable” is intended to allow the content of a structure plan to be tailored to the nature and scope of the development proposal to which it relates and, to give effect to this Method, District plans can identify methods for assessing which of the above matters must be addressed, in light of the particular scope of the proposed land use change and its environmental effects.
- Implementation responsibility: Regional council, city and district councils.*

3.2.2 Guiding methods

Method 67: Support rural structure plans

Support the development of rural structure plans for rural areas outside ~~the urban limits or~~ existing and planned urban ~~zone~~ areas that are subject to growth pressure.

Implementation: Regional council and city and district councils.

Appendix A – Definitions

Change 6 note – only those definitions that are amended, deleted or added are shown. All other definitions are not changed.

Terms are not included if they are:

- defined in the Resource Management Act 1991 or other commonly used Acts,
- the usual dictionary meaning,
- referred to only in the explanatory text, not the policies, and or
- ~~referred to~~ defined in a National Policy Statements.

Business land: Areas of land used or zoned for commercial or industrial activities ~~and includes areas shown in Appendix C.~~

...

Existing urban area: Those existing developed urban zoned areas reticulated with wastewater and water supply infrastructure ~~that are outside of the greenfield development growth area.~~

Urban limits: ~~The outer extent of the areas (shown on Maps 5 to 15 in Appendix E) which urban activities are located or which are committed for future urban expansion.~~

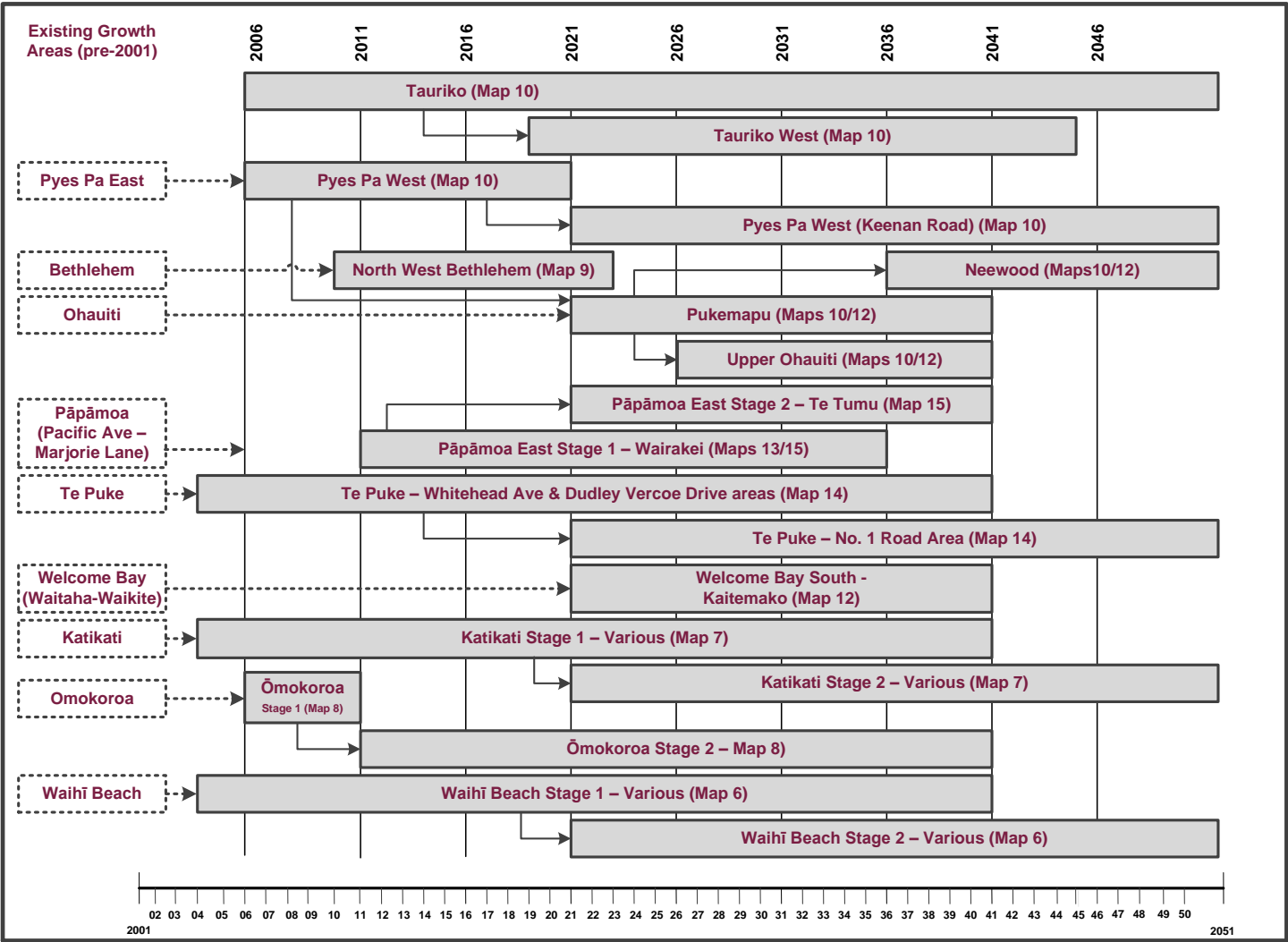
Appendix C – Indicative growth area timing and business land provision

Table 17 – Indicative growth area timing and business land provision table.

Management area	Growth Area	Development begins	For residential growth area development estimated capacity reached by	Provision of approximately 1000 ha net for large-scale business land
Waihi Beach	Stage 1 (various) Stage 2 (various)	Underway 2021	2041	Business land is provided at Waihi Beach through the Emerton Road Industrial Zone.
Katikati	Stage 1 (various) Stage 2 (various)	Underway 2021	2041	Existing business land and developments contiguous to it will provide for the needs of this community.
Ōmokoroa	Stage 1 Stage 2	2006 2011	2011 2041	Business land has been provided as part of Ōmokoroa Stage 2.
Tauranga West	North-west Bethlehem Tauriko Tauriko West	2010 Underway 2019	 2045	New business land is located at Tauriko.
Tauranga Central	Infill/intensification Pyes Pa West Pyes Pa West (Keenan Rd) Pukemapu Neewood	2006 2006 2021 2021 2036	Unknown 2021 2041	Existing business land and developments contiguous to it will serve the Tauranga Central area.
Tauranga South	Welcome Bay South (Kaitemake) Upper Ohauti	2021 2026	2041 2041	
Mount Maunganui	Infill/Intensification	2006	Unknown	
Papāmoa	Pāpāmoa East Stage 1 Pāpāmoa East Stage 2	2011 2021	2036 2041	The start date of 2021 for development in Pāpāmoa East Stage 2 is for residential development only. Developments that are predominantly non-residential in character may start before 2021. Any developments at Pāpāmoa East Stage 2 shall be subject to consideration of Policies UG 6A and UG 10B.
To Puke	Dudley Vercoe Drive and Whitehead Ave areas No. 1 Road area	Underway 2021	2041	Business land will be provided at To Puke to support the local community.
Paengaroa	Rangioru	2007		Rangioru business park.

Appendix D – Indicative growth area sequencing

Diagram 1: Indicative growth area sequencing Change 6 Note - For clarity the box below is deleted



Note – The start date of 2021 for development in Pāpāmoa East Stage 2 is for residential development only. Developments that are predominantly non-residential in character may start before 2021. Any developments at Pāpāmoa East Stage 2 shall be subject to consideration of Policy UG 6A and Policy UG 10B.

~~Appendix E – Management and Growth areas for the western Bay of Plenty~~

Change 6 Note - For clarity Maps 4A to 15 (inclusive) are deleted

~~Map 4A – Management areas~~

~~Map 5 – Index to Growth area Maps 6-15~~

~~Map 6 – Waihi Beach and Bowentown~~

~~Map 7 – Katikati~~

~~Map 8 – Ōmokoroa~~

~~Map 9 – Bethlehem~~

~~Map 10 – Tauranga Central – Pyes Pā~~

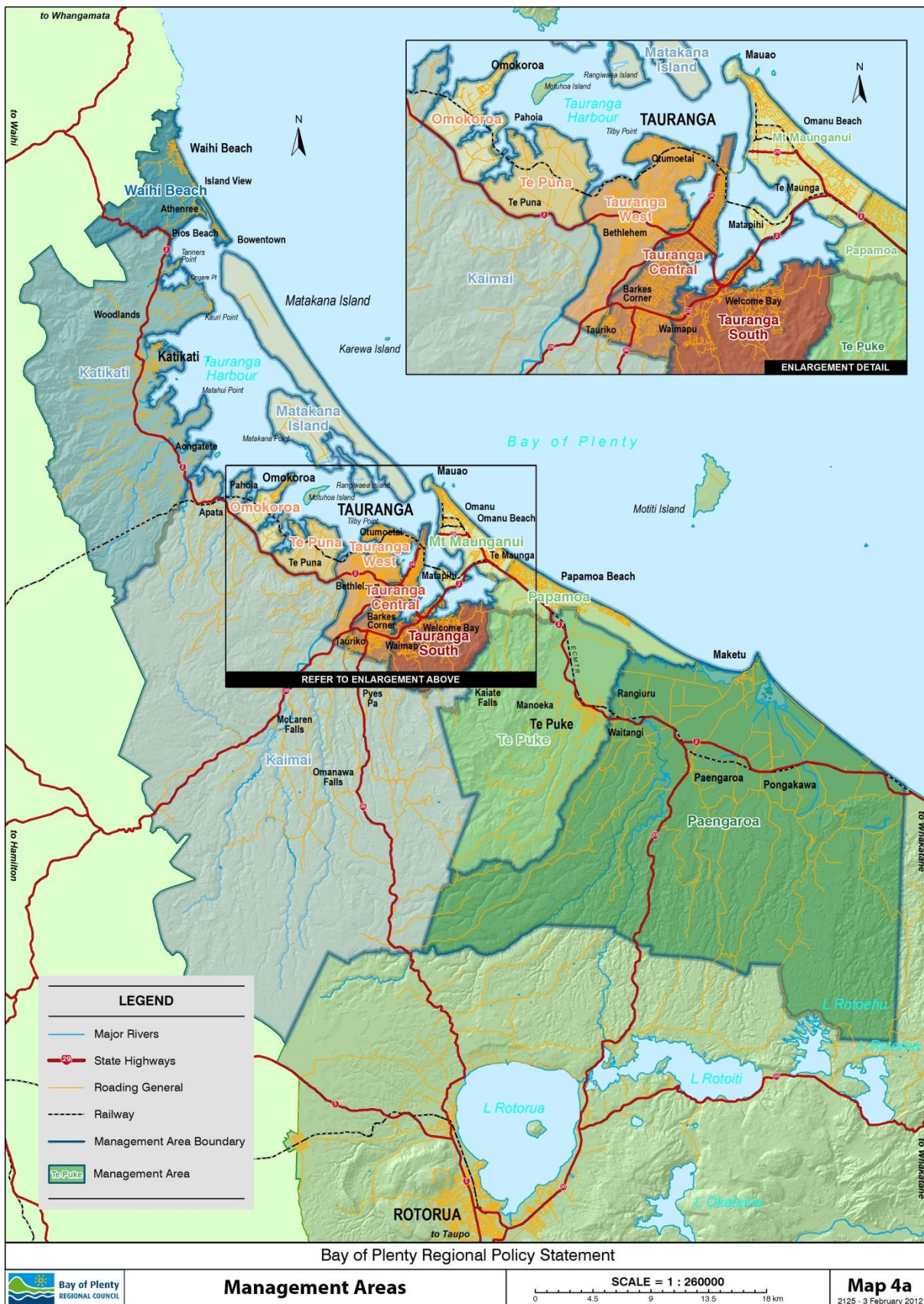
~~Map 11 – Mount Maunganui~~

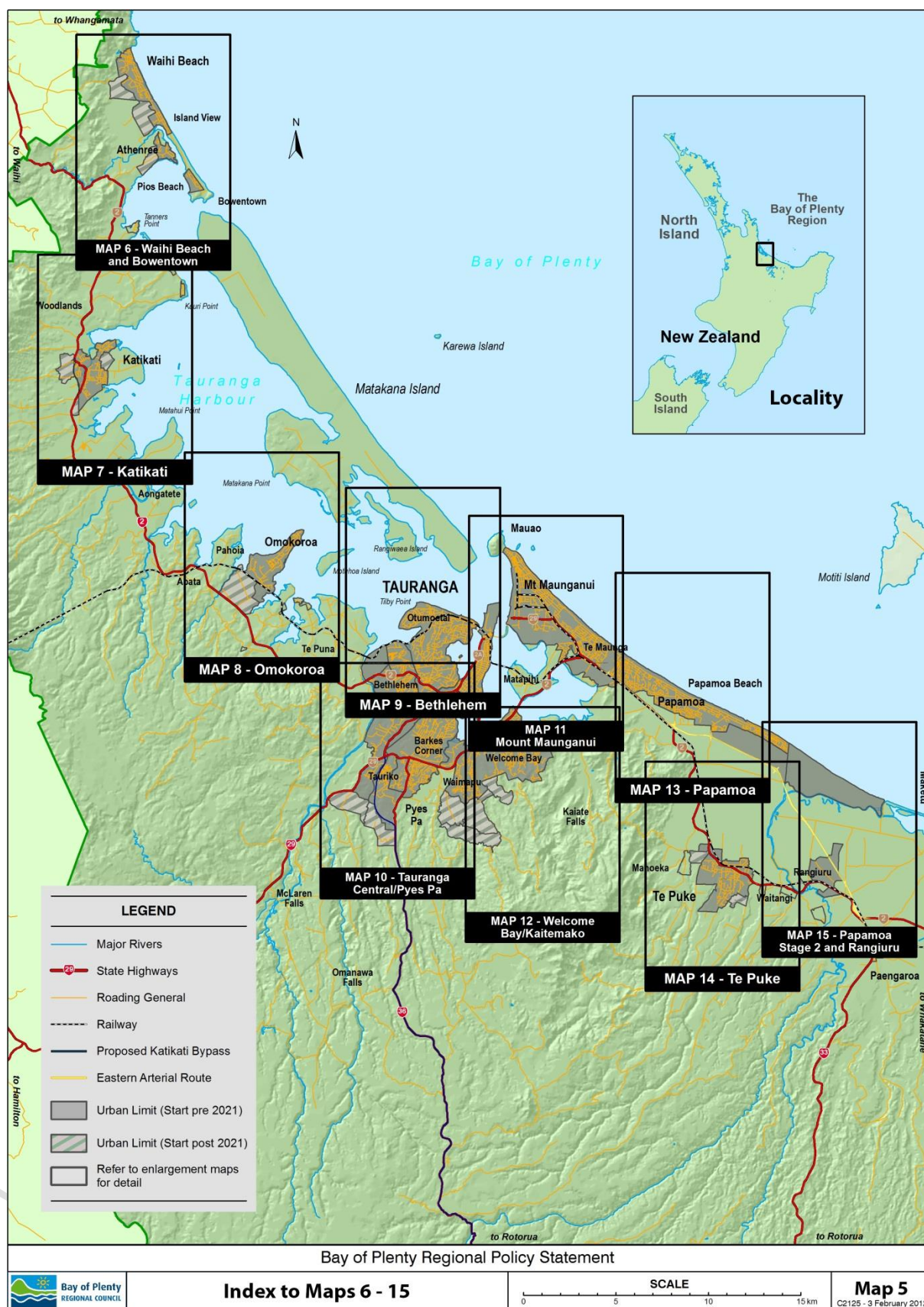
~~Map 12 – Welcome Bay~~

~~Map 13 – Pāpāmoa~~

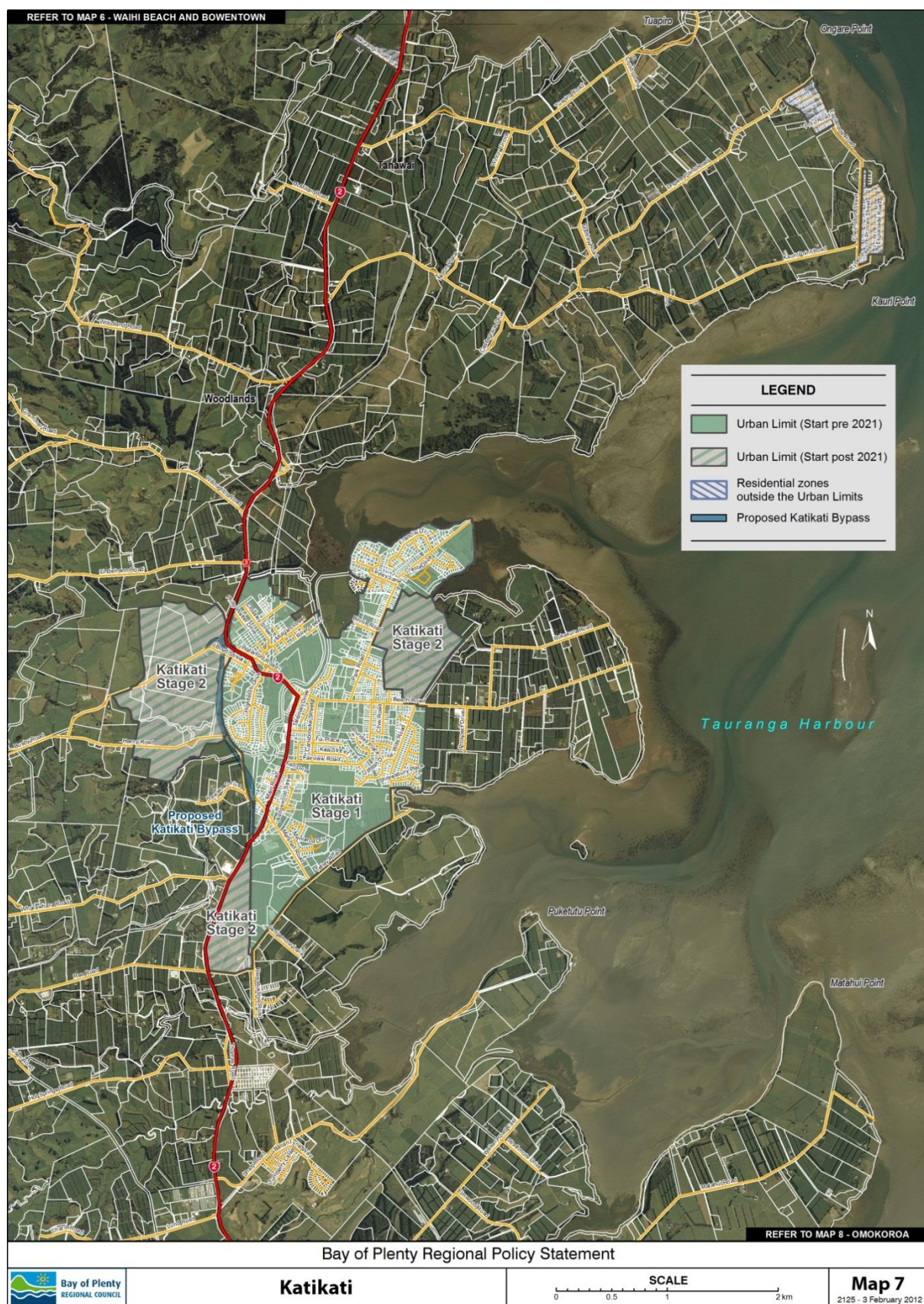
~~Map 14 – Te Puke~~

~~Map 15 – Pāpāmoa Part 2 and Rangiuru~~



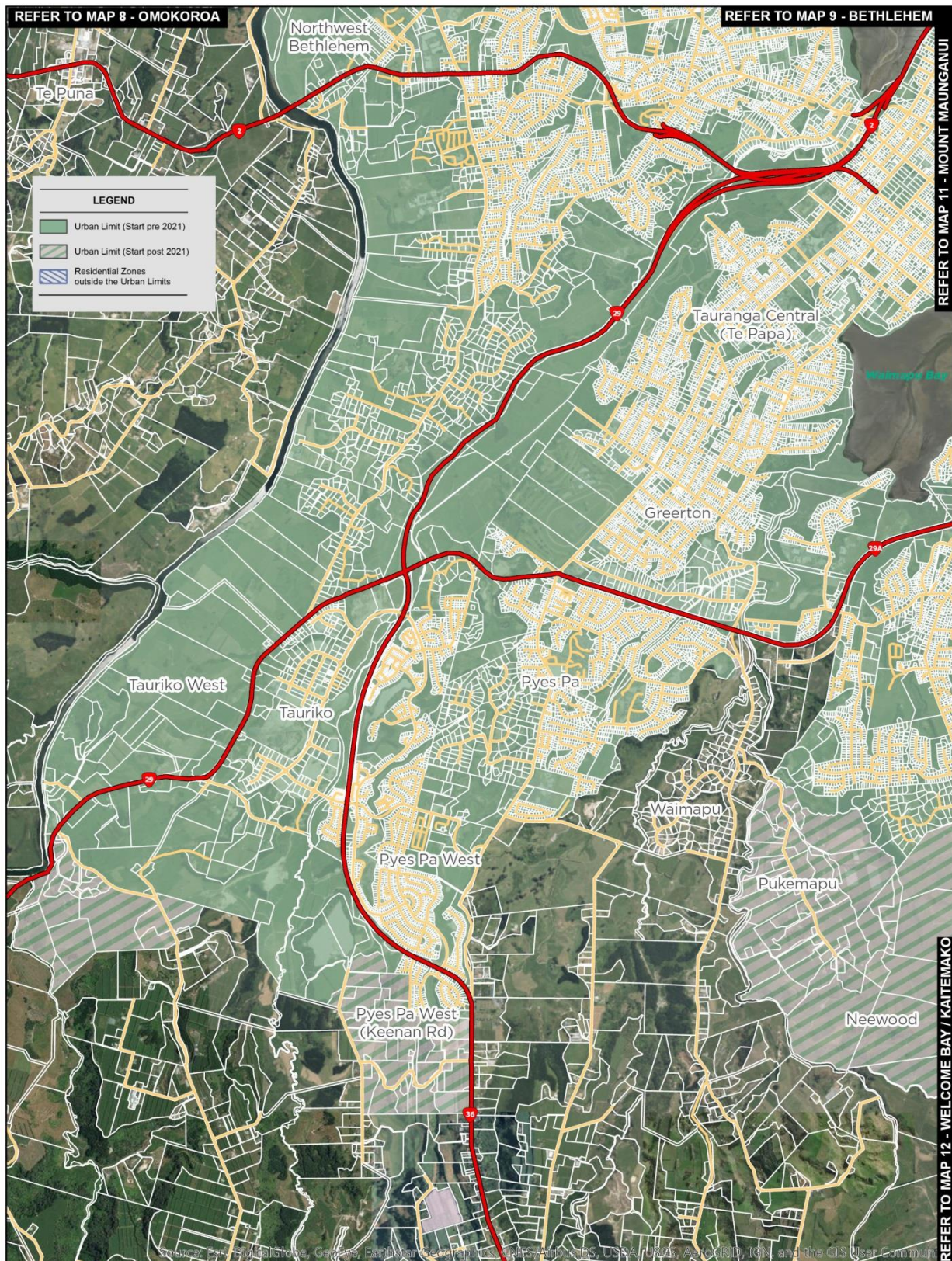




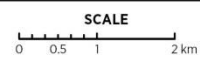






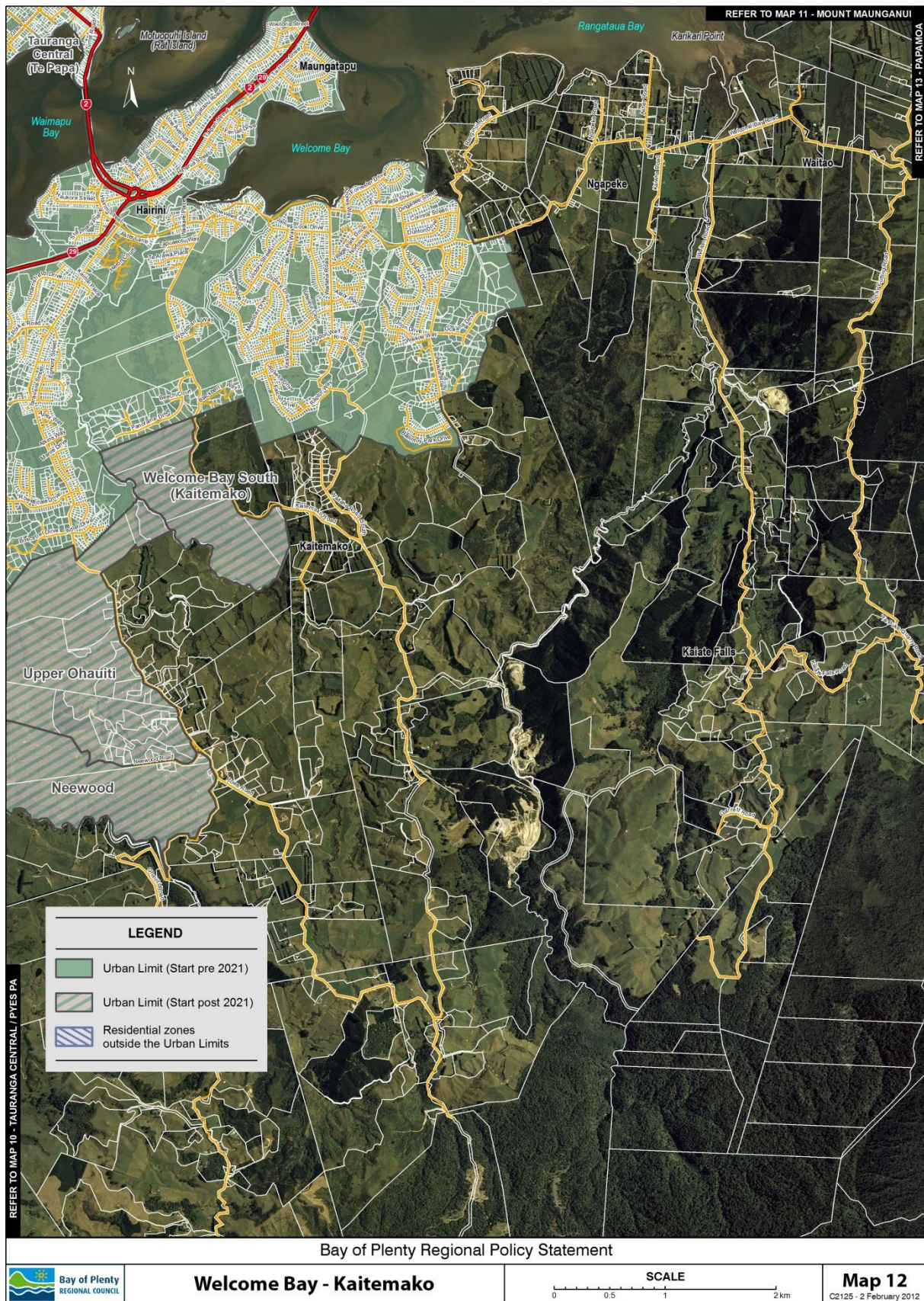


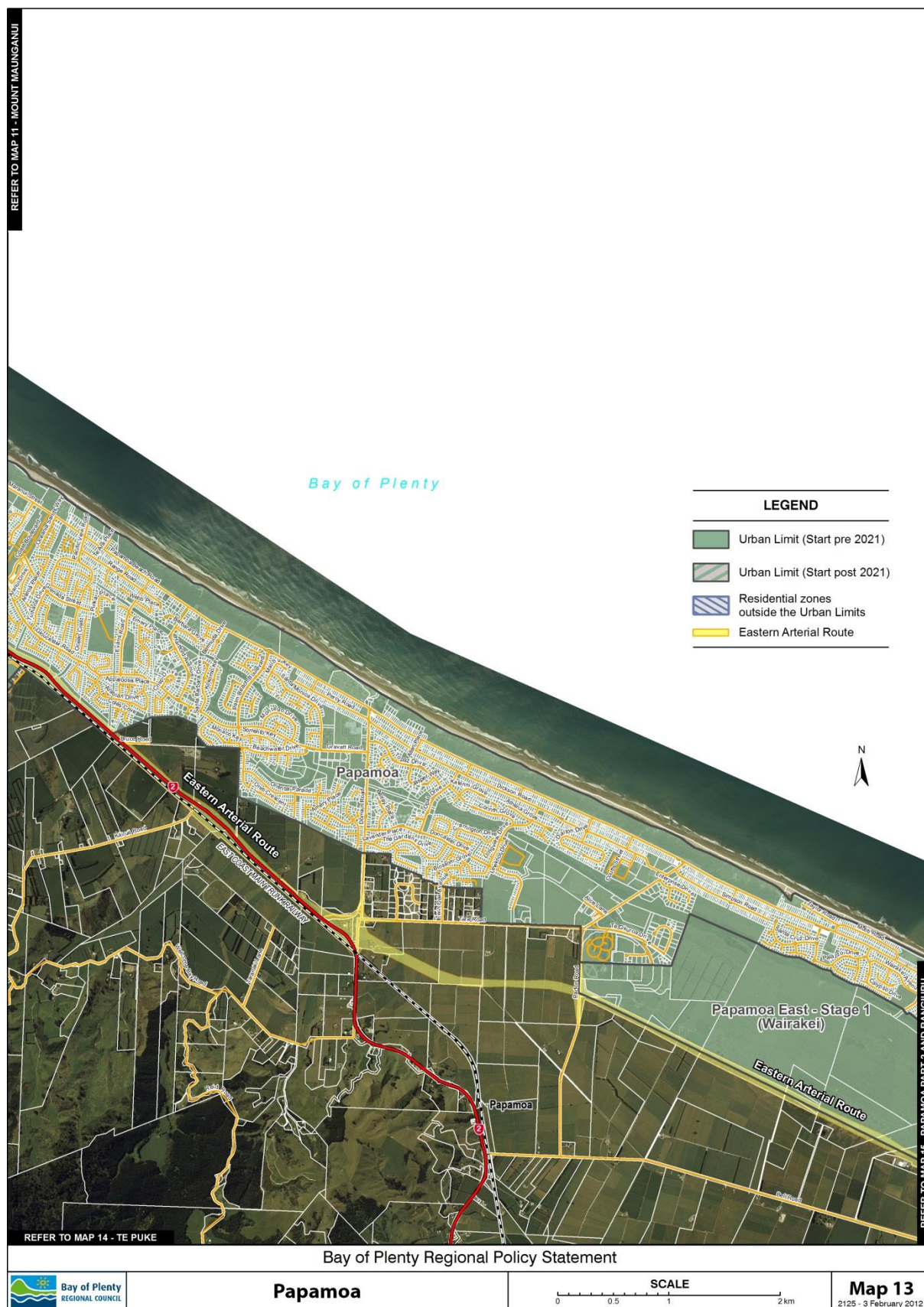
Bay of Plenty Regional Policy Statement

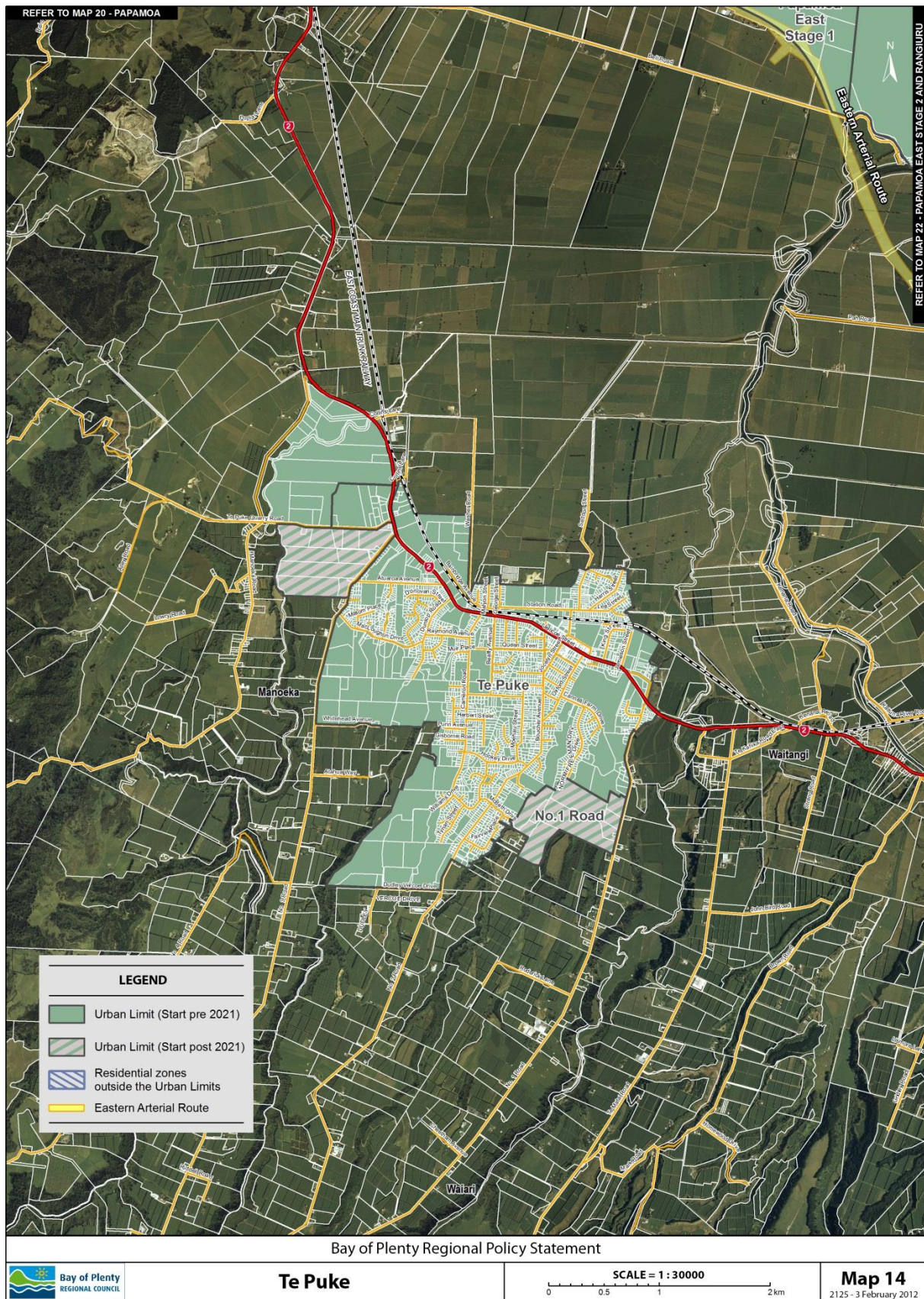
**Tauranga Central - Pyes Pa**

Map 10
C2125 - 23 July 2018











Attachment C

Names and addresses of submitters to be served with copy of appeal

Bay of Plenty Regional Council PO Box 364 Whakatāne 3158 RPSChange6@boprc.govt.nz	Element IMF Attention: Grant Downing grant@elementimf.co.nz	Bayliss Ham Group Ltd Attention: Mike Bayliss bayliss@southnet.co.nz
Retimana Whānau Trust Attention: Geoff Rice cosmiccar@xtra.co.nz	Ian and Elizabeth Gargan Gargan Road RD 1 Tauriko Tauranga 3110	Kāinga Ora - Homes and Communities PO Box 74598 Greenlane Auckland 1051 Attention: Brendon Liggett developmentplanning@kaingaora.govt.nz
Federated Farmers of NZ Attention: Jesse Brennan jbrennan@fedfarm.org.nz	National Public Health Services Toi Te Ora Public Health PO Box 2120 Tauranga 3140 Attention: Cushla Vanstone enquiries@toiteora.govt.nz	Julian and Joy White jugewhite1@gmail.com
Tauranga City Council Private Bag 12022 Tauranga 3143 Attention: Simon Banks simon.banks@tauranga.govt.nz	Ballance Agri-Nutrients Ltd C/- Sharp Tudhope Lawyers Private Bag TG12020 Tauranga 3143 Attention: Richard Hoare/Barbara Mead RichardH@st.co.nz ; Barbaram@st.co.nz	Bell Road Limited Partnership PO Box 11057 Palm Beach Papamoa 3151 Attention: Nathan York nathan@bhml.co.nz
Bluehaven Investments Ltd PO Box 11057 Palm Beach Papamoa 3151 Attention: Nathan York nathan@bhml.co.nz	Classic Developments Limited C/- PO Box 14371 Tauranga Mail Centre Tauranga 3143 Attention: Aaron Collier aaron@collierconsultants.co.nz	Des Heke – Ngāti He hapū des_heke@xtra.co.nz
Fonterra Limited C/- Mitchell Daysh Ltd PO Box 1307 Hamilton 3240 Attention: Abbie Fowler abbie.fowler@mitchelldaysh.co.nz	Ford Land Holdings Pty Limited C/- Bconn Limited PO Box 13428 Tauranga 3141 Attention: Jeff Fletcher jeff.fletcher@bconn.co.nz	Royal Forest and Bird Protection Society NZ Inc (Bay of Plenty Branches) 28 Sandleigh Drive Athenree 3177 Attention: Linda Conning Easternbayofplenty.branch@forestandbird.org.nz
Horticulture New Zealand PO Box 10-232 Wellington Attention: Sarah Cameron sarah.cameron@hortnz.co.nz	Keith Warwick 156 Kaitemako Road RD 5 Tauranga info@nci.net.nz	KiwiRail Holdings Ltd C/- Russell McVeagh PO Box 8 Auckland 1140 Attention: Jacob Burton / Allison Arthur-Young / Lauren Rapley jacob.burton@russellmcveagh.com ; allison.arthur-young@russellmcveagh.com ; lauren.rapley@russellmcveagh.com

Mitre 10 Holdings Limited C/- Aurecon New Zealand Limited PO Box 2292 Tauranga 3140 Attention: Andrew Gysberts Andrew.gysberts@aurecongroup.co.m	Newman Group Limited C/- Collier Consultants Limited PO Box 14371 Tauranga Mail Centre Tauranga 3143 Attention: Aaron Collier aaron@collierconsultants.co.nz	Ngā Potiki a Tamapahore Trust C/- Stratum Consultants Limited PO Box 13651 Tauranga 3141 Attention: Shae Crossan shae.crossan@stratum.nz
Tony Wihapi for Ngāti Moko hapū representative on Te Ihu o Te Waka o Te Arawa tonywihapi@gmail.com	Rotorua Lakes Council 1061 Haupapa Street Rotorua 3046 Attention: Damon Mathfield Damon.Mathfield@rotorualc.nz	Tauranga Crossing Limited C/- Bentley & Co Ltd PO Box 4492 Shortland Street Auckland Attention: Mark Arbuthnot marbuthnot@bentley.co.nz
Transpower NZ Limited 31 Gilberthorpes Road Islington Christchurch 8042 Attention: Trudi Burney Environment.Policy@transpower.co.nz	Tumu Kaituna 14 Trust C/- Bconn Limited PO Box 13428 Tauranga 3141 Attention: Jeff Fletcher jeff.fletcher@bconn.co.nz	Veroe Holdings Limited C/- Collier Consultants Limited PO Box 14371 Tauranga Mail Centre Tauranga 3143 Attention: Aaron Collier aaron@collierconsultants.co.nz
Waka Kotahi PO Box 13055 Tauranga Central Tauranga 3141 Attention: Rodney Albertyn rodney.albertyn@nzta.govt.nz ; EnvironmentalPlanning@nzta.govt.nz	Waste Management NZ Limited C/- Russell McVeagh PO Box 8 Auckland 1140 Attention: Alice Gilbert alice.gilbert@russellmcveagh.com	Western Bay of Plenty District Council 1484 Cameron Road Greerton Tauranga 3112 Attention: Emily Watton Emily.Watton@westernbay.govt.nz
Yvonne James balnacoil@xtra.co.nz	Grace Tsai 228 Pyes Pa Road Tauranga sts005@gmail.com	