

Before the Independent Hearings Panel

under: the Resource Management Act 1991

in the matter of: Submissions and further submissions in relation to the
proposed Otago Regional Policy Statement

submitter: **Fonterra Limited**
Submitter 233

Memorandum of counsel on behalf of Fonterra Limited

Dated: 21 April 2023

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MEMORANDUM OF COUNSEL ON BEHALF OF FONTERRA LIMITED

- 1 This memorandum is filed on behalf of Fonterra Limited (*Fonterra*), in response to the Panel's Minute 7, dated 16 February 2023 (*Minute*).
- 2 The Minute requested the section 42A report writer for the Urban Form and Development (*UFD*) chapter to "rewrite" the chapter by the end of March 2023, and interested submitters to provide a response by Friday 21 April 2023.
- 3 Fonterra submitted on a number of objectives and policies in the UFD chapter, along with an associated method. In particular, Fonterra sought, and continues to seek, a suite of provisions recognising and protecting regionally significant industry and provisions that adequately address reverse sensitivity effects.
- 4 The amendments sought by Fonterra, and reasons for the amendments, have been addressed in:
 - 4.1 evidence of Suzanne O'Rourke dated 22 November 2022;
 - 4.2 evidence of Susannah Tait dated 22 November 2022;
 - 4.3 evidence of Michael Copeland dated 22 November 2022; and
 - 4.4 legal submissions dated 7 February 2023.
- 5 Fonterra also appeared to present its case to the hearings panel on 7 February 2023.
- 6 Fonterra has carefully reviewed the "rewritten" UFD chapter. While Fonterra acknowledges that there has been material changes to the structure and direction of the chapter, it considers that the changes do not address the concerns outlined above.
- 7 Fonterra therefore seeks further amendments to recognise and protect regionally significant industry from reverse sensitivity effects, with proposed changes shown in red mark up in **Annexure 1**, which are to:
 - 7.1 Objectives UFD-O1 and UFD-O4;
 - 7.2 Policies UFD-P1, UFD-P3, UFD-P4, URD-P5, UFD-P7, UFD-P8;
 - 7.3 Method UFD-M2.

- 8 Fonterra seeks these further amendments for the reasons outlined in Fonterra's submission, further submissions, evidence and legal submissions.
- 9 Fonterra considers these amendments will assist the Otago Regional Policy Statement to *best* achieve its purpose – the promotion of the sustainable management of Otago's natural and physical resources.¹
- 10 If it would assist the Panel, Fonterra is able to provide planning evidence or legal submissions to address these proposed amendments further.

Dated: 21 April 2023

A handwritten signature in blue ink, appearing to read 'B G Williams / K I G Jacomb', written over a horizontal line.

B G Williams / K I G Jacomb

¹ See sections 5 and 59 of the RMA

UFD – Urban form and development

Objectives

UFD-O1 – Development of *urban areas*

The development and change of Otago's *urban areas* occurs in a strategic and coordinated way, which:

- (1) accommodates the diverse and changing needs and preferences of Otago's people and communities, now and in the future,
- (2) integrates effectively with surrounding urban and rural areas and manages conflict between incompatible landuses,
- (3) results in a consolidated, well-connected and well-designed urban form which is integrated with *infrastructure*, and
- (4) supports *climate change adaptation* and *climate change mitigation*;
- (5) facilitates the safe and efficient ongoing operation and development of regionally significant industry.

UFD-O4 – Development in *rural areas*

Development in Otago's *rural areas* occurs in a way that:

- (4) provides for the ongoing use of *rural areas* for *primary production* and, supported by rural industry in appropriate locations, and
- (4A) does not compromise the *productive capacity*, and long-term viability of the rural sector (including regionally significant industry based in rural locations) and rural communities.

Policies

UFD-P1 – Strategic planning

Strategic planning processes, undertaken at an appropriate scale and detail, precede urban growth and development and:

- (1) identify how housing choice, quality, and affordability will be improved,
- (1A) ensure integration of *land use* and *infrastructure*, including how, where and when necessary *development infrastructure* and *additional infrastructure* will be provided, and by whom,
- (2) demonstrate at least sufficient *development capacity* supported by integrated *infrastructure* provision for Otago's housing and business needs in the short, medium and long term,
- (3) maximise current and future opportunities for increasing resilience, and facilitate adaptation to changing demand, needs, preferences and *climate change*,

- (5) indicate how connectivity will be improved and connections will be provided within *urban areas*,
- (6) provide opportunities for iwi, hapū and whānau involvement in planning processes, including in decision making, to ensure provision is made for their needs and aspirations, and cultural practices and values,
- (7) facilitate involvement of the current community and respond to the reasonably foreseeable needs of future communities, and
- (8A) identifies areas of potential conflict between incompatible activities and the potential for reverse sensitivity effects and sets out the methods by which these are to be avoided resolved.

UFD-P2 – Sufficiency of *development capacity*

Ensure that at least sufficient housing and business *development capacity* is provided in *urban areas* in the short, medium and long term including by:

- (5) responding to any demonstrated insufficiency in housing or business *development capacity* by increasing *development capacity* or providing more *development infrastructure* as required, as soon as practicable,
- (5A) being responsive to plan changes that demonstrate compliance with UFD-P10, and
- (6) requiring Tier 2 *urban environments* to meet, at least, the relevant housing bottom lines in APP10.

UFD-P3 – Urban intensification

Ensure that intensification in urban areas, as a minimum:

- (1) contributes to establishing or maintaining the qualities of a *well-functioning urban environment*,
- (2) is well-served by existing or planned *development infrastructure* and *additional infrastructure*,
- (3) enables heights and densities that meet the greater of demonstrated demand for housing and/or business use or the level of accessibility provided for by existing or planned *active transport* or *public transport*, and
- (5) addresses issues of concern to iwi and hapū, including those identified in any relevant iwi planning documents;
- (6) does not compromise the safe and efficient ongoing use of regionally significant industry.

UFD-P4 – Urban expansion

Expansion of existing *urban* only occurs where the expansion:

- (1) contributes to establishing or maintaining the qualities of a *well-functioning urban environment*,
- (1A) is identified by and undertaken consistent with strategic plans prepared in accordance with UFD-P1, or is required to address a shortfall identified in accordance with UFD-P2,
- (1B) achieves consolidated, well designed and sustainable development in and around existing urban areas,

- (2) is logically and appropriately staged, and will not result in inefficient or sporadic patterns of settlement and residential growth,
- (3) is integrated efficiently and effectively with *development infrastructure* and *additional infrastructure* in a strategic, timely and co-ordinated way,
- (4) addresses issues of concern to iwi and hapū, including those identified in any relevant iwi planning documents,
- (6) avoids *highly productive land*, except as provided in the NPS-HPL, and
- (7) considers adverse *effects*, particularly *reverse sensitivity* effects, on existing and anticipated *primary production* or *rural industry* activities when determining the location of the new urban/rural boundary;
- (8) does not compromise the safe and efficient ongoing operation of regionally significant industry.

UFD-P5 – Commercial activities

Provide for *commercial activities* in urban areas by:

- (1) enabling a wide variety and scale of *commercial activities*, social, recreational and cultural activities to concentrate in city, metropolitan, town centres and commercial zoned areas, where appropriate, especially if they are highly accessible by *public transport* or *active transport*,
- (2) enabling smaller local and neighbourhood centres, mixed use zones and rural settlements to accommodate a variety of *commercial activities*, social, recreational and cultural activities of a scale appropriate to service local community needs, and
- (4) outside the areas described in (1) and (2), provide for small scale retail and service activities, home occupations and *community services* to establish within or close to the communities they serve.

UFD-P6 – Industrial activities

Provide for *industrial activities* in urban areas by:

- (1) identifying specific locations and applying zoning suitable for accommodating *industrial activities* and their reasonable needs and *effects* including supporting or *ancillary activities*,
- (2) identifying a range of *land* sizes and locations suitable for different *industrial activities*, and their *operational needs* including land-extensive activities,
- (3) avoiding activities likely to result in *reverse sensitivity effects* on existing or potential *industrial activities* or likely to result in an inefficient use of industrial zoned *land* or *infrastructure*, particularly where the area provides for a significant *operational need* for a particular *industrial activity* or grouping of *industrial activities* that are unlikely or are less efficiently able to be met in alternative locations and
- (4) in areas that are experiencing or expected to experience high demand from other urban activities, and the criteria in (3)(a) does not apply, only allowing for the transition of industrial zoned areas to other purposes, by first applying (1) and (2).

UFD-P7 – Rural areas

The management of development in *rural areas*:

- (2) maintains *rural areas* as places where people live, work and recreate and where a range of activities and services are required to support these rural functions, and provide for social and economic wellbeing within rural communities and the wider region,
- (3) prioritises *land-based primary production on highly productive land* in accordance with the NPS-HPL,
- (4) provides for *primary production, rural industry* (including regionally significant industry) and supporting activities and recognises:
 - (a) the importance of mineral and aggregate resources for the provision of *infrastructure* and the social and economic well-being of Otago’s communities, and
 - (b) that mining and aggregate extraction activities can only be located where those resources are present, and
- (6) restricts the establishment of ~~non-rural~~ sensitive activities which could adversely affect, including by way of reverse sensitivity or fragmentation, the *productive capacity* of *highly productive land* or existing or anticipated *primary production* and *rural industry* activities, unless those activities are undertaken in accordance with MW-P4 or the NPS-HPL.

UFD-P8 – Rural lifestyle development

The establishment, development or expansion of rural lifestyle development only occurs where:

- (2) it avoids *land* identified for future urban development in a relevant plan or *land* reasonably likely to be required for its future urban development potential, where the rural lifestyle development would foreclose or reduce efficient realisation of that urban development potential,
- (3) it minimises impacts on existing *primary production, rural industry* and other rural activities and avoids the potential for *reverse sensitivity effects* to arise in adjoining rural production zones,
- (4) it avoids *highly productive land*, except as provided for in the NPS-HPL,
- (5) the suitability of the area to accommodate the proposed development is demonstrated, including
 - (a) capacity for servicing by existing or planned *development infrastructure* (including self-servicing requirements),
 - (b) particular regard is given to the individual and cumulative impacts of *water* supply, wastewater disposal, and *stormwater* management including self-servicing, on the receiving or supplying environment and impacts on capacity of *development infrastructure*, if provided, to meet other planned urban area demand, and
 - (c) likely future demands or implications for publicly funded services including emergency services and *additional infrastructure*;
 - (d) does not compromise the safe and efficient ongoing use of regionally significant industry.

UFD-P10 – Criteria for significant development capacity

‘Significant development capacity’ is provided for where a proposed plan change affecting an *urban environment* meets all of the following criteria:

- (3) required *development infrastructure* can be provided effectively and efficiently for the proposal, and without material impact on planned *development infrastructure* provision to, or reduction in *development infrastructure* capacity available for, other feasible, likely to be realised developments, in the short-medium term,
- (4) the proposal makes a significant contribution to meeting a need identified in a *Housing and Business Development Capacity Assessment*, or a shortage identified in monitoring for:
 - (a) housing of a particular price range or typology, particularly more affordable housing,
 - (b) business space or *land* of a particular size or locational type, or
 - (c) community or educational facilities, and
- (5) when considering the significance of the proposal’s contribution to a matter in (4), this means that the proposal’s contribution:
 - (a) is of high yield relative to either the forecast demand or the identified shortfall,
 - (b) will be realised in a timely (i.e. rapid) manner,
 - (c) is likely to be taken up, and
 - (d) will facilitate a net increase in district-wide up-take in the short to medium term.

Methods

UFD-M1 – Strategic planning

Otago Regional Council and *territorial authorities*:

- (1) must, where they are Tier 2 local authorities, jointly determine housing *development capacity* that is feasible and likely to be taken up in the medium and long terms through *Housing and Business Development Capacity Assessments*,
- (2) should, for other districts, jointly determine demand and potential supply responses through similar, but appropriately scaled strategic planning approaches,
- (3) must, where they are Tier 2 and Tier 3 local authorities, monitor and regularly assess and report on the supply of, and demand for, residential, commercial and industrial zoned *land development capacity* available at the regional, district and *urban environment* scales, and other local authorities are encouraged to do so,
- (4) must coordinate the redevelopment and intensification of urban areas and the development of extensions to urban areas with *infrastructure* planning and development programmes, to:
 - (a) provide the required *development infrastructure* and *additional infrastructure* in an integrated, timely, efficient and effective way, and
 - (b) identify major existing and future activities, constraints and opportunities,

and for Tier 2 local authorities to achieve this through jointly developed *Future Development Strategies* and/or strategic planning, and for all other *local authorities* through strategic planning in accordance with UFD–P1,

- (5) must, where they are Tier 2 local authorities, develop housing bottom lines for urban environments and include those bottom lines in APP10 and in the relevant *district plans*,
- (6) must individually or jointly develop further regulatory or non-regulatory methods and actions to implement strategic and spatial plans, including to guide the detail of how, when and where development occurs, including matters of urban design, requirements around the timing, provision, and responsibilities for open space, connections and infrastructure, including by third parties, and the ongoing management of effects of urban development on matters of local importance, and
- (7) must involve *mana whenua*, and provide opportunities for iwi, hapū and whānau involvement in planning processes, including in decision making.

UFD-M2 – *District plans*

Territorial authorities must prepare or amend their *district plans* as soon as practicable, and maintain thereafter, to:

- (1) identify and provide for urban expansion and intensification, to occur in accordance with:
 - (a) any adopted *future development strategy* for the relevant district or region, which must be completed in time to inform the 2024 Long Term Plan, or
 - (b) where there is no *future development strategy*, a *local authority* adopted strategic plan developed in accordance with UFD-P1, for the relevant area, district or region,
- (2) in accordance with any required *Housing and Business Development Capacity Assessments* or monitoring, including any *competitiveness margin*, ensure there is always at least sufficient *development capacity* that is feasible and likely to be taken up and, for Tier 2 urban environments, at a minimum meets the bottom lines for housing in APP-10, and meets the identified *land* size and locational needs of the commercial and industrial sectors, and where there is a shortage, respond in accordance with UFD-P2,
- (3) ensure that urban development is designed to:
 - (a) achieve a built form that relates well to its surrounding *environment*,
 - (b) provide for a diverse range of housing, *commercial activities*, industrial and service activities, social and cultural opportunities,
 - (c) achieve an efficient use of *land, energy, water* and infrastructure,
 - (d) promote the use of water sensitive design wherever practicable,
 - (e) ~~minimise avoid~~ the potential for reverse sensitivity *effects to arise*, by managing the location of incompatible activities, within the urban area, at the rural-urban interface,
 - (eb) avoid the potential for reverse sensitivity effects on regionally significant industry,
 - (f) reduce the adverse *effects* of Otago’s cooler winter climate through designing new

subdivision and development to maximise passive winter solar gain and winter heat retention, including through roading, lot size, dimensions, layout and orientation,

- (4) identify and provide for locations that are suitable for urban intensification in accordance with UFD-P3,
- (5) identify and provide for locations that are suitable for urban expansion, if any, in accordance with UFD-P4,
- (6) identify and provide for *commercial activities* in accordance with UFD-P5,
- (7) identify and provide for *industrial activities* in accordance with UFD-P6,
- (8) manage development in *rural areas* in accordance with UFD-P7,
- (9) manage rural lifestyle development in accordance with UFD-P8,
- (11) involve *mana whenua* and provide opportunities for iwi, hapū and whānau involvement in planning processes, including in decision making, and
- (11A) ensure the design and maintenance of places and spaces, including streets, open spaces, public *buildings* and publicly accessible spaces so that they are safe, attractive, accessible and usable by everyone in the community.

UFD-M3 – Design of public spaces and surrounds

Territorial authorities must design and maintain public places and spaces, including streets, open spaces, public *buildings* and publicly accessible spaces so that they are safe, attractive, accessible and usable by everyone in the community.

Explanation

UFD-E1 – Explanation

The policies in this chapter are designed to facilitate the provision of sufficient housing and business capacity and ensure all of the region's *urban areas* demonstrate the features of *well-functioning urban environments* and meet the needs of current and future communities. Urban intensification and urban expansion decisions should be preceded and guided by strategic planning processes that consider how best this can be achieved and in consideration of local context, values and pressures. The strategic planning process will also consider and demonstrate where, when, how and by whom the necessary *development infrastructure* and *additional infrastructure* will be provided in order to both facilitate development and change and minimise environmental impacts from it.

In addition, this chapter seeks to manage development in Otago's rural areas, to support the viability of the rural sector. This approach includes direction on different types of development within rural areas, managing the expansion and location of *urban areas*, and rural lifestyle development, and directing that growth be enabled in *urban areas* to minimise the need for development to occur within rural areas.

The policies in this chapter are primarily focused on directing where development is and is not appropriate and under what circumstances, but provides discretion for *local authorities* to determine

the detail of how that development is managed, its ultimate density, height, bulk and location, timing and sequencing, the detail of any required *development infrastructure* and *additional infrastructure* that may be needed, and allows for the consideration of particular locally significant features, values and needs that contribute to the attractiveness or uniqueness of the diverse communities, landscapes, and environments of the region.

This more detailed determination must, however, be informed by evidence and information collated through appropriately scaled *strategic planning* processes which will identify how constraints to urban development, such as hazards, landscapes, *highly productive land*, and limits are responded to, and opportunities for meeting demand, integration with lifeline utilities, infrastructure and other requirements may be provided for. They will be implemented by a range of regulatory and non-regulatory methods, including partnership arrangements with iwi, developers, infrastructure providers and central government, joint development of *Housing and Business Assessments* and *Future Development Strategies* for Tier 2 local authorities, and similar but appropriately scaled processes undertaken in and for other areas, including regular regional, district and *urban environment* scale monitoring, analysis and evaluation.

In delivering on the objectives and policies in this chapter, which relate largely to human activities and settlements, the natural, physical, and built values and features of importance to the region must be recognised and provided for. These values and features are largely identified within other chapters and provision of the RPS. They also provide detail on how they should be identified and managed. Achieving the objectives of this chapter requires consideration of those other relevant parts of this RPS.

The following chapters of this Regional Policy Statement have particular relevance to the achievement of the objectives of this chapter by identifying particular aspects of Domains or Topics to be managed, and where there is an apparent conflict, must be balanced in accordance with the directions outlined in the IM - Integrated Management chapter:

- MW – *Mana Whenua*
- AIR – Air
- CE – Coastal environment
- LF – *Land and freshwater*
- ECO – Ecosystems and indigenous *biodiversity*
- EIT – Energy, *infrastructure* and transport
- HAZ – Hazards and *risks*
- HCV – Historical and cultural values
- NFL – Natural features and landscapes

Principal reasons

UFD-PR1 – Principal reasons

The provisions in this chapter assist in fulfilling the functions of the regional council under section 30(ba) and *territorial authorities* under section 31(aa) of the RMA-to ensure sufficient *development*

capacity in relation to housing and *business land* to meet the expected demands of the region and districts respectively. They also assist in giving effect to the similar but more detailed requirements of the *NPSUD*.

Urban areas are important for community well-being and are a reflection the inherently social nature of humans. *Well-functioning urban areas* enable social interactions and provide a wide variety (across type, location and price) of housing, employment and recreational opportunities to meet the varied and variable needs and preferences of communities, in a way that maximises the well-being of its present and future inhabitants, and respects its history, its setting and the *environment*. The combination of population growth and demographic change will result in changes in the quantity and qualities demanded of housing, employment, business, *infrastructure*, social facilities, emergency services and *lifeline utilities* and other services across the region. Upgrade and replacement of the existing development and infrastructure will also continue to be required even where growth is limited, resulting in changes in the built environment. Some of these changes will also be driven by changes in the *natural environment*, including the impacts of climate change. Urban areas are highly dynamic by nature, so the provisions in this chapter seek to manage, rather than limit, the form, function, growth and development of urban areas in a way that best provides for the community's well-being both now and into the future.

The pace and scale of growth and change, and the scale and nature of urban environments and areas in the region is variable, meaning no single response at a regional level is appropriate in all cases. Accordingly, the process identified in this RPS remains flexible and responsive (outside of Tier 2 *urban environments*, which have specific requirements under the *NPSUD*). Key requirements of strategic planning include considering and providing for reasonably expected changes in overall quantum of demand and supply as well as changes in needs and preferences that may drive or add to these changes in demand, designing to maximise the efficient use of energy, land and infrastructure (including transport infrastructure). This can best be achieved by prioritising development in and around the region's existing urban areas as the primary focus of the region's growth and change, by enabling development within and adjacent to those urban areas, where it generally is most suitable and most efficient to do so.

These strategic planning processes provide the mechanism by which longer term issues can be considered, integration between land use and infrastructure can be achieved, and various constraints, opportunities and key trade-offs can be identified and appropriately resolved, while identifying and managing the values and resources identified in this RPS. These processes, and others should always involve *mana whenua*, at all levels of the process to ensure their views and values can be incorporated and celebrated, and their needs and aspirations appropriately provided for.

All development should seek to maximise efficient use of water consumption (through water efficient design) and disposal. Reduced consumption reduces sewerage loads, and water sensitive design reduces impacts on both supplying and receiving natural systems and can reduce flooding from stormwater, and maximise the winter capture and retention of the sun's energy, which will also assist with reducing the energy needed to heat homes in winter and can also help reduce *air* pollution from solid fuel burning for home heating. Development in more central parts of the region also need to be designed to be cognisant of minimising excess sun capture in the summer months.

Rural areas contain activities and resources critical for rural production. There is pressure from non-rural activities and rural lifestyle development to locate within the rural area, but these activities can

be sensitive to primary production or rural industry and can adversely affect rural production. The provisions in this chapter focus on managing where rural living opportunities and other non-rural activities are provided for, so that the potential *effects* on productive potential and the wide range of environmental values, features and resources that rural areas also contain are appropriately managed. The supply of rural lifestyle opportunities to meet demand should be directed to suitably located and zoned areas to minimise impacts on values in rural areas. In designing and planning for rural lifestyle development, local authorities will need to be aware of the potential future constraints on future urban expansion and development, including the cumulative impacts of infrastructure servicing irrespective of whether this is onsite, community or through connections to urban reticulated schemes.

Implementation of the provisions in this chapter will occur partially through *regional plans* but primarily *district plan* provisions, as well as through preparation of *future development strategies* and *structure plans* and the financial and infrastructure planning processes they inform. While the functions and duties of regional and territorial authorities are different, each brings different focus and responsibilities to the task of achieving *well-functioning urban environments*. Working together, and with others, in accordance with specified joint responsibilities under the NPSUD, will assist with achieving the purpose of the RMA and the outcomes sought by this RPS.

To appropriately and efficiently achieve the objectives and policies, other non-regulatory spatial planning exercises and associated action plans, agreements and infrastructure delivery programs will be needed to complement regulatory approaches, including setting aside the necessary funding for delivery, and partnering with *mana whenua*, central government, communities and developers to deliver the quality and quantity of urban development needed to meet demand and provide for change, improve land and development market competitiveness, and achieve resilient, efficient and attractive urban places.

Anticipated environmental results

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| UFD-AER1 | Appropriately scaled strategic planning occurs in advance of regulatory planning, and regulatory plans are changed in a timely manner to facilitate to outcomes identified in these processes. |
| UFD-AER2 | Urban expansion only occurs when suitable and sufficient <i>development infrastructure</i> is in place or will be provided at the time of expansion and provision is made for the needs of <i>additional infrastructure</i> . |
| UFD-AER3 | <i>Development infrastructure</i> is in place in time to facilitate reasonably expected urban intensification or planned expansion. |
| UFD-AER4 | New developments including redevelopments are designed to maximise energy and transport efficiency and minimise impacts on <i>water</i> quality and quantity. |
| UFD-AER5 | The majority of new urban development is located close to services, jobs, and other urban amenities and can access those amenities by a range of transport modes including <i>active transport</i> and, where available, <i>public transport</i> . |

UFD-AER6	The mode share and use of <i>active transport</i> and where available, <i>public transport</i> increases.
UFD-AER9	There is an increased range of housing types and locations and an increased number of <i>dwellings</i> , particularly more affordable housing in existing and planned <i>urban areas</i> .
UFD-AER10	The current and future needs of business are met by the availability of a range of opportunities for <i>land</i> and space that meets their requirements.
UFD-AER11	New rural lifestyle development occurs within areas appropriate for this use.
UFD-AER12	The establishment of activities within rural areas does not result in adverse effects on activities functionally dependent on rural resources and rural surroundings.
UFD-AER13	Urban expansion and urban activities are appropriately planned so that they do not adversely affect the <i>productive capacity</i> , and long-term viability of the rural sector and rural communities.
UFD-AER14	<i>Mana whenua</i> are involved in strategic planning and other planning processes.