

BEFORE THE HEARING PANEL

UNDER

the Resource Management Act 1991

IN THE MATTER

of Proposed Change 6 (National Policy Statement for Urban Development) to the Bay of Plenty Regional Policy Statement

**PLANNING EVIDENCE OF ABBIE FOWLER
ON BEHALF OF FONTERRA LIMITED**

19 JUNE 2023

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1. INTRODUCTION

- 1.1 My full name is Abbie Maree Fowler.
- 1.2 I have a Bachelor of Environmental Planning degree from the University of Waikato and have approximately 11 years' experience in the resource management field.
- 1.3 I have been employed by Mitchell Daysh Limited ("**Mitchell Daysh**"), based in the Hamilton office, since March 2018. During this time, I have been involved in the preparation of submissions and resource consent applications, including statutory planning assessments, and providing resource management advice to a wide range of clients in relation to their development aspirations in respect of both district council and regional council processes.
- 1.4 I was responsible for drafting Plan Change 11 to the Waipa District Plan (including the supporting section 32 evaluation report), which resulted in the creation of the Bardowie Industrial Precinct at Hautapu (north of Cambridge) and facilitated the progressive relocation and consolidation of Architectural Profile Limited's business activities.
- 1.5 On behalf of Builtsmart Property Partnership I project managed the inputs required to support Plan Change 22 to the Waikato District Plan, prepared the Plan Change documentation, and the accompanying section 32 analysis which resulted in the re-zoning of this property.
- 1.6 I have assisted Fonterra Limited ("**Fonterra**") with submissions on both district and regional plans, including Plan Change 2, Plan Change 9 and Plan Change 12 to the Hamilton City District Plan, Plan Change 17 and Plan Change 26 to the Waipa District Plan, the Proposed Waikato District Plan, Plan Change 22 to the Tauranga City District Plan and Plan Change 13 to the Bay of Plenty Regional Natural Resources Plan (Air Quality). I have prepared planning assessments for resource consent applications to enable aspects of the ongoing operation of the Hautapu Dairy Manufacturing Site (wastewater discharges to land and the Waikato River), Edgumbe Dairy Manufacturing Site (discharges to water) and the Reporoa Dairy Manufacturing Site (wastewater discharges to land).
- 1.7 I have also prepared submissions on various iterations of the National Policy Statement for Freshwater Management and the Draft National Policy Statement on Indigenous Biodiversity for a large electricity generator.

- 1.8 Prior to joining Mitchell Daysh, I spent approximately five years employed by Genesis Energy Limited, one of New Zealand's largest electricity generators. I held various roles at Genesis, including as an Environmental Coordinator at the Huntly Power Station, the Environmental Lead for the North Island renewable schemes based at the Tokaanu Power Station (secondment) and as Environmental Coordinator – Policy and Planning. In this latter role, I led their national, regional and local policy and planning workstreams. In this position, I represented the company on the Land and Water Forum Plenary, was an electricity sector representative on the Biodiversity Collaborative Group, and prepared a number of submissions on national, regional and local policy instruments under the Resource Management Act 1991 ("**RMA**"). I was also the project manager of a significant resource consenting project which resulted in 400MW of peaking electricity generation being consented at the Huntly Power Station.
- 1.9 I have also held positions at regional councils, where my role focused on assessing resource consent applications and undertaking compliance monitoring, primarily for municipal wastewater discharges and water takes.

Scope of Evidence

- 1.10 I have been engaged by Fonterra to present planning evidence in relation to Proposed Change 6 to the Bay of Plenty Regional Policy Statement ("**BOP RPS**"). Specifically, my evidence will:
- (a) Outline the statutory planning framework applicable to Proposed Change 6;
 - (b) Discuss reverse sensitivity as a planning concept;
 - (c) Describe the changes I propose to Proposed Change 6 to ensure that reverse sensitivity is considered alongside residential development and intensification, and respond to the matters raised in the section 42A report;
 - (d) Address Fonterra's further submissions in respect of the National Policy Statement Highly Productive Land ("**NPS-HPL**") and the draft National Policy Statement on Indigenous Biodiversity;
 - (e) Address the requirements of section 32AA of the RMA; and
 - (f) Present an overall conclusion.

Code of Conduct

- 1.11 I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and I agree to comply with it.
- 1.12 My qualifications as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my area of expertise, except where I state that I have relied on the evidence of other persons. I have not omitted to consider material facts known to me that might alter or detract from the opinions I have expressed.

2. CURRENT PLANNING FRAMEWORK

- 2.1 The following section of my evidence identifies and briefly summarises the relevant provisions of the statutory planning framework that apply to Proposed Change 6.

National Policy Statement on Urban Development

- 2.2 The National Policy Statement on Urban Development 2020 ("**NPS-UD**") requires, among other things, that Tier 1 territorial authorities¹ amend their RMA plans to enable intensification in urban areas where people want to live and work. Specific to Proposed Change 6, the NPS-UD also introduced requirements for regional councils to amend their respective regional policy statements to be more responsive to urban development proposals and provide support for the intensification of urban areas.
- 2.3 While Proposed Change 6 focuses on implementing the residential requirements of the NPS-UD, I note that there are several provisions in the NPS-UD that also require:
- (a) Urban environments to be well functioning to provide for, among other matters, economic wellbeing;²
 - (b) Regional policy statements to enable more business to be located in areas of urban environment;³
 - (c) Planning decisions should enable a variety of sites that are suitable for different business sectors in terms of location and site size;⁴ and

¹ The Bay of Plenty Regional Council is a Tier 1 local authority.

² NPS-UD Objective 1.

³ NPS-UD Objective 3.

⁴ NPS-UD Policy 1 (b).

- (d) Provide for sufficient development capacity to meet expected demand for business land (the definition of business land includes the Industrial Zone).⁵

2.4 In my opinion, while the NPS-UD requires residential development and intensification, this development and intensification needs to be supported by appropriate business land and employment opportunities (which enable and support economic wellbeing).

National Policy Statement for Highly Productive Land

2.5 The NPS-HPL was gazetted on 19 September and came into force on 17 October 2022.

2.6 The overarching objective of the NPS-HPL seeks that highly productive land is protected for use in land-based primary production, both now and for future generations. This objective is supported by several policies, which require that highly productive land is:

- (a) Recognised as finite;⁶
- (b) Managed in an integrated way⁷, and mapped⁸;
- (c) Prioritised for land based primary production;⁹
- (d) Generally, not rezoned for urban development or rural residential development;¹⁰
- (e) Generally, not subdivided;¹¹
- (f) Protected from inappropriate use and development;¹² and
- (g) Used for land based primary production by protecting these activities from reverse sensitivity effects.¹³

⁵ NPS-UD Policy 2.

⁶ NPS-HPL Policy 1.

⁷ NPS-HPL Policy 2.

⁸ NPS-HPL Policy 3.

⁹ NPS-HPL Policy 4.

¹⁰ NPS-HPL Policy 5 and Policy 6.

¹¹ NPS-HPL Policy 7.

¹² NPS-HPL Policy 8.

¹³ NPS-HPL Policy 9.

- 2.7 Part 3 of the NPS-HPL contains matters that local authorities must do to give effect to the objective and policies. Such matters include the requirement for regional councils to map highly productive land in a regional policy statement no later than three years after the commencement date, using the RMA First Schedule process¹⁴. In the interim, soils with LUC 1 – 3 have protection under the NPS-HPL.
- 2.8 Part 4 of the NPS-HPL sets out that every local authority must give effect to the NPS-HPL on and from the commencement date. This means that Proposed Change 6 presents an opportunity to give effect to some of the requirements of the NPS-HPL, where appropriate.

Bay of Plenty Regional Policy Statement

- 2.9 The BOP RPS sets out a range of existing policy directives in relation to the built environment and reverse sensitivity. I note that the BOP RPS provides a definition of 'reverse sensitivity' as follows:

Reverse sensitivity: The potential for the operation of an existing lawfully established activity to be compromised, constrained, or curtailed by the more recent establishment of other activities which are sensitive to the adverse environmental effects being generated by the pre-existing activity.

- 2.10 The key existing BOP RPS provisions relating to the management of reverse sensitivity require:
- (a) The discouraging of reverse sensitivity associated with odours, chemicals and particulates, including by discouraging locating new sensitive activities¹⁵ near activities that include discharges to air;¹⁶
 - (b) Adopting an integrated approach to resource management that responds to the nature and values of the resource and the diversity of effects (including cumulative and reverse sensitivity effects) that can occur;¹⁷

¹⁴ NPS-HPL clause 3.5.

¹⁵ The BOP RPS defines 'Sensitive Activities' as *activities which suffer should they experience adverse effects typically associated with some lawful activities. For example, smells from a sewage treatment facility or noise from a port facility. Activities considered to be sensitive include but are not necessarily limited to any residential activity, any childhood education centre and any other accommodation facility.*

¹⁶ BOP RPS Policy AQ 1A.

¹⁷ BOP RPS Policy IR 3B (c).

- (c) Protecting the ability to develop, maintain, operate and upgrade existing, consented and designated regionally significant infrastructure from incompatible subdivision, use or development. Where potentially incompatible subdivision, use or development is proposed near regionally significant infrastructure, it should be designed and located to avoid potential reverse sensitivity effects;¹⁸
- (d) Managing the development and use of infrastructure and associated resources so as to address actual or potential effects on existing lawfully established activities in the vicinity;¹⁹
- (e) Providing for the expansion of existing business activities or existing zoned business land²⁰ outside urban limits (in the Western Bay of Plenty sub-region) only if the proposal will avoid, remedy or mitigate effects on rural production activities;²¹
- (f) Requiring that subdivision, use and development of rural areas does not compromise or result in reverse sensitivity effects on rural production activities and the operation of infrastructure;²²
- (g) Providing for the operation and growth of rural production activities, including by protecting those activities from reverse sensitivity effects;²³
- (h) The management of reverse sensitivity effects on existing rural production activities located within the urban limits and or existing or planned urban zoned areas;²⁴ and
- (i) Including plan provisions in regional and district plans that enable the efficient operation and growth of rural production activities.²⁵

¹⁸ BOP RPS Policy EI 3B.

¹⁹ BOP RPS Policy EI 7B.

²⁰ The BOP RPS defines 'Business Land' as *areas of land used or zoned for commercial or industrial activities.*

²¹ The BOP RPS defines 'Rural Production Activities' as *rural land use activities that rely on the productive capacity of land or have a functional need for a rural location such as agriculture, pastoral farming, dairying, poultry farming, pig farming, horticulture, forestry, quarrying and mining. Also included in this definition are processing and research facilities that directly service or support those rural land use activities.* See also BOP RPS Policy UG 7A (d).

²² RPS Policy UG 20B.

²³ RPS Policy UG 23B.

²⁴ RPS Policy UG 24B.

²⁵ RPS Method 20.

2.11 In my opinion, the existing provisions in the BOP RPS provide a clear directive regarding the need to manage the potential for reverse sensitivity in the context of rural production activities and nationally / regionally significant infrastructure.

2.12 While the BOP RPS recognises the concept of reverse sensitivity in respect of regionally significant infrastructure, rural production activities and discharges to air, there is no clear direction in the BOP RPS regarding the need to manage potential reverse sensitivity effects and land use conflicts within established urban areas or within urban limits (that relate to industrial or commercial activities that do not fit within the ambit of the definition of rural production activities or regionally significant infrastructure).

3. REVERSE SENSITIVITY

3.1 I understand that various decisions of the Environment Court have identified the following "planning principles" with respect to reverse sensitivity and are directly relevant to the intensification of residential activity in proximity to industrial, business or rural land:

- (a) The concept of reverse sensitivity is an accepted effect under the RMA and may arise when more sensitive activities locate in close proximity to existing activities. Those existing uses form part of the "existing environment" which have actual or potential offsite effects that cannot be fully internalised. The owners and occupiers of these new more sensitive land uses then seek to constrain the existing use or, just as importantly, will oppose any attempt to further develop or expand the existing activity;
- (b) District councils are responsible for managing these reverse sensitivity effects (e.g., by making appropriate provisions in their district plans and in the determination of resource consent applications).
- (c) District plans must give effect to direction in a regional policy statement, so it is appropriate to include direction regarding the management of reverse sensitivity in regional policy statements; and
- (d) Generally, buffer zones or setbacks are appropriate around existing (less sensitive) activities where those uses have taken reasonable steps to avoid, remedy or mitigate their offsite effects. Sensitive uses seeking to establish within those zones or setbacks are required to be assessed against various criteria to determine the potential level

of reverse sensitivity effects, and may be subject to conditions (e.g. acoustic insulation) reducing those potential effects.

3.2 It is not always the actual effects of large-scale industrial activities which give rise to reverse sensitivity issues, but rather the perception of an adverse effect caused by higher expectations of amenity being imposed on the environment by neighbouring land use activities. This is discussed further in the evidence of Ms O'Rourke.

3.3 In my experience, reverse sensitivity can manifest in several ways, including:

- (a) Complaints from third parties in relation to the effects of lawfully established industrial activities, and the costs for those existing activities associated with having to respond to such complaints (irrespective of the merits of those complaints);
- (b) Additional costs associated with resource consent applications (e.g., notification requirements);
- (c) An increased likelihood of submissions in opposition to resource consent applications made by the operators of industrial activities and appeals in relation to any decision to grant such consents; and
- (d) Submissions and/or further submissions on district and regional plans that seek greater limitations or restrictions (e.g., reduced noise limits, reductions in the hours of operation, lighting limits and traffic limits) on existing industrial activities.

3.4 As explained by Ms O'Rourke, an increase in the residential density around Fonterra's sites has the potential to increase the potential for reverse sensitivity effects to impact on the operations (and upgrading or expansion) of those assets.

4. CHANGES SOUGHT TO PROPOSED CHANGE 6 TO ADDRESS REVERSE SENSITIVITY

4.1 An increase in residential intensity around established industrial or commercial activities has the potential to result in reverse sensitivity issues which, in turn, can significantly curtail current and future industrial or commercial activities within the Bay of Plenty Region.

4.2 To address the matters I have discussed, and the matters raised in Fonterra's submission, I consider that further refinements to Proposed Change 6 are

required to ensure that the management of reverse sensitivity is considered alongside residential intensification. My proposed amendments are set out in **Annexure A**.

4.3 My proposed amendments to Proposed Change 6 only address reverse sensitivity in the context of urban development as I consider that the rural production side of Fonterra's submission is already adequately captured by the existing provisions of the BOP RPS. My amendments focus on the need to:

- (a) Provide for unanticipated out of sequence urban growth in a manner where the development avoids the potential for reverse sensitivity effects (Policy UG 7A);
- (b) Provide for increased density in urban environments in a manner that minimises land use conflicts and the potential for reverse sensitivity effects (Policy UG 7Ax). I have deliberately focussed this amendment on 'minimising' reverse sensitivity in recognition that within existing urban areas avoiding reverse sensitivity would be challenging; and
- (c) Restricting the growth of urban areas outside of urban environments unless it can be demonstrated that the development avoids potential reverse sensitivity effects (Policy UG 14B).

4.4 I note that the further submission of Kainga Ora on Fonterra's primary submission opposes any relief relating to reverse sensitivity on the basis that effects should be managed 'at source' as far as practicable. Internalisation of effects is inconsistent with the provisions of the BOP RPS, which recognises the importance of managing reverse sensitivity effects and does not require internalisation of effects.

4.5 The section 42A report, prepared by Ms Samantha Pottage recommends the blanket rejection of all submission points relating to reverse sensitivity, stating²⁶:

The primary purpose of Proposed Change 6 is to give effect to the responsive planning and intensification requirements of the NPS-UD. Broader urban and rural growth management issues will need to be addressed as part of the pending RPS review, and particularly Proposed Change 8. In the interim, staff consider reverse sensitivity effects are appropriately recognised by the aforementioned RPS provisions which remain relevant to new urban growth proposals.

²⁶ At paragraph 18.4 of the section 42A report.

- 4.6 As I have already stated, I acknowledge that the primary purpose of Proposed Change 6 is to give effect to the requirements of the residential intensification NPS-UD. However, it is my opinion that the NPS-UD also requires urban environments to be 'well-functioning' and supported by appropriate business land. Clearly, a potential effect of the residential intensification required by the NPS-UD is reverse sensitivity and potential increases in land use conflicts between intensified residential activities and industrial / commercial activities within existing urban areas.
- 4.7 Aside from the rejection of all submission points relating to reverse sensitivity, the section 42A report contains no considered analysis of each submission point and there is no analysis of whether the existing BOP RPS reverse sensitivity related provisions provide policy guidance for the management of reverse sensitivity in urban areas. Indeed, the policies identified in the section 42A report as recognising reverse sensitivity effects relate to [my emphasis in bold]:²⁷
- (a) **Rural production activities and infrastructure** in rural areas;
 - (b) The effects of **infrastructure** development and use;
 - (c) Discouraging reverse sensitivity effects associated with **odours, chemicals and particulates**; and
 - (d) Protecting **nationally and regionally significant infrastructure**.
- 4.8 None of the policies identified by the section 42A author require the management of reverse sensitivity within urban areas in the context of general industrial or commercial uses (outside of nationally / regionally significant infrastructure) which may generate noise, lighting, vehicle movements (or have longer operating hours) that can conflict with the amenity expectations of residential land uses (thus, creating land use conflicts).
- 4.9 I also note that Ms Pottage sets out that reverse sensitivity and "urban and rural growth management issues" are matters to be addressed in a subsequent change to the BOP RPS, namely Proposed Change 8. I do not consider it appropriate from a planning perspective to rely on a future (undetermined) change process to capture submission points that should be dealt with during

²⁷ Identified at paragraph 3(a) as being *Policy UG 20B: Managing reverse sensitivity effects on rural production activities and infrastructure in rural areas*, *Policy EI 7B: Managing the effects of infrastructure development and use*, *Policy AQ 1A: Discouraging reverse sensitivity effects associated with odours, chemicals and particulates*, and *Policy EI 3B: Protecting nationally and regionally significant infrastructure*.

this Proposed Change 6 process (and those which are clearly "on" the proposed change). I do note that the section 42A report²⁸ sets out that the purpose of Proposed Change 8 is to implement the highly productive land mapping requirements of the NPS-HPL. Given this purpose of the proposed change, it is unclear whether there would be scope to address reverse sensitivity within an urban area.

4.10 The section 32AA evaluation report prepared by Ms Pottage sets out that:

- (a) The benefits and costs associated with not including such changes [in respect of reverse sensitivity] is neutral²⁹; and
- (b) The BOP RPS already recognises reverse sensitivity effects on existing lawfully established activities through various policies. Additional policy would add little and so is not considered necessary.

4.11 It is my opinion that it is efficient and effective to address reverse sensitivity as part of Proposed Change 6 (where appropriate) given that reverse sensitivity is often an effect of residential intensification and given that there is no policy direction in the BOP RPS regarding the management of reverse sensitivity in an existing urban environment (outside of rural production activities and infrastructure).

5. NATIONAL POLICY STATEMENT ON HIGHLY PRODUCTIVE LAND

5.1 A number of parties in their primary submissions sought to amend Proposed Change 6 to give effect to the requirements of the NPS-HPL. Fonterra had concerns regarding the relief sought by some submitters as the relief was vague and unspecific and therefore the consequence of that relief could not be readily ascertained. In particular, some submitters sought that the NPS-HPL be fully given effect to through Proposed Change 6, which in my opinion, is not appropriate because giving effect to the NPS-HPL would require a substantial mapping exercise (which will take time to undertake) which could have substantial implications for property owners whose land is mapped as 'highly productive'.

5.2 I therefore agree with the section 42A author's recommendation that the key requirements of the NPS-HPL be addressed in a separate change process.

²⁸ At paragraph 19.4 of the section 42A report.

²⁹ At paragraph 3(a) of the section 32AA report.

6. **DRAFT NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY**

6.1 The primary submission of the Royal Forest & Bird Protection Society of NZ - BOP branches, sought that Proposed Change 6 be amended to incorporate relevant aspects of the National Policy Statement on Indigenous Biodiversity if it is notified before the Proposed Change 6 process is complete.

6.2 The draft National Policy Statement on Indigenous Biodiversity has not been gazetted and is not in effect, so I consider this submission point simply does not apply.

7. **SECTION 32AA**

7.1 Section 32AA of the RMA, requires that:

32AA Requirements for undertaking and publishing further evaluations.

(1) A further evaluation required under this Act—

(a) is required only for any changes that have been made to, or are proposed for, the proposal since the evaluation report for the proposal was completed (the changes); and

(b) must be undertaken in accordance with section 32(1) to (4); and

(c) must, despite paragraph (b) and section 32(1)(c), be undertaken at a level of detail that corresponds to the scale and significance of the changes; and

(d) must—

(i) be published in an evaluation report that is made available for public inspection at the same time as the approved proposal (in the case of a national policy statement or a New Zealand coastal policy statement or a national planning standard), or the decision on the proposal, is notified; or

(ii) be referred to in the decision-making record in sufficient detail to demonstrate that the further evaluation was undertaken in accordance with this section.

(2) To avoid doubt, an evaluation report does not have to be prepared if a further evaluation is undertaken in accordance with subsection (1)(d)(ii).

(3) In this section, proposal means a proposed statement, national planning standard, plan, or change for which a further evaluation must be undertaken under this Act.

7.2 In my opinion, the amendments I have proposed to Proposed Change 6 (as shown in Annexure A) are more effective and efficient than the notified version of Proposed Change 6, as those amendments will achieve similar outcomes in respect to giving effect to the NPS-UD while also providing policy guidance regarding the need to manage potential reverse sensitivity effects that may arise through residential intensification.

8. **CONCLUSION**

8.1 I support the overall intent of Proposed Change 6 in giving effect to the NPS-UD. However, I consider that additional amendments are required, as outlined in my evidence, to ensure that reverse sensitivity is considered alongside residential intensification.

Abbie Fowler

19 June 2023

Annexure A Proposed Amendments

I propose the following amendments to Proposed Change 6 to the BOP RPS to address the issues raised in the submission by Fonterra to ensure that reverse sensitivity is considered alongside residential intensification:

- (a) Amend Issue 2.8.1, as follows, with my proposed amendments underlined:

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 appropriate 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 create land use conflicts and reverse sensitivity effects, adversely affect rural production activities and to reduce the ability of versatile land to be used for a range of productive purposes.

- (b) Amend Policy UG 7A, as follows, with my proposed amendments underlined:

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 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, and*

(g) *The development avoids the potential for reverse sensitivity effects.*

I note that consequential changes to the explanation for this policy would be required to address my proposed amendment.

(c) Amend Policy UG 7Ax as follows with my proposed insertions underlined:

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 served by existing or planned development infrastructure and public transport, and*

(d) *Minimises land use conflicts and the potential for reverse sensitivity effects.*

(d) Amend Policy UG 14B as follows, with my proposed insertions underlined:

Policy UG 14B: Restricting urban activities outside urban environments

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, and*

(c) *The development avoids the potential for reverse sensitivity effects.*