



First name: Melvin

Last name: Dinn

Postal address:

Suburb:

City:

Country: New Zealand

Email: melvindinn@gmail.com

Daytime Phone:

- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I 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 the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

File
Melvin Dinn Taupo Plans

Submission Table

- We recommend using this submission table to state your submission points. This will assist Council to accurately record your submission points and ensure your submission is valid.
- Each individual submission point should be on a different row. Use as many rows as you require.
- You can attach additional commentary and documents should you need to.
- The examples in italics below are for guidance only to show how submission points could be set out and do not represent a position of Council.
- This form is for use for the following Plan Changes:
 - Plan Change 38 – Strategic Directions
 - Plan Change 39 – Residential Building Coverage
 - Plan Change 40 – Taupō Town Centre Environment
 - Plan Change 41- Removal of Fault lines
 - Plan Change 42 – General Rural and Rural Lifestyle Environments
 - Plan Change 43 – Taupō Industrial Environment Rezoning

Plan Change State which Plan Change that your submission relates (see above)	Specific part/provision State the specific part or provision of proposed Plan Change your submission relates to. If you cannot give a specific number Council Planners will add this for you.	Support? Oppose? Amend? choose one of the above	Relief sought What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?	Reasons Include reason(s) for your submission point
PC39	General	Amend	All sections over 600- 999 sq m sqm be allowed to be subdivided into two	This will bring more revenue to the council and affordable housing will become possible. Civic resources and infrastructure will get better use and quick repairs.
PC39	General	Amend	All sections over 1000 sqm - 1500 sq m to be subdivided into 3 and section over 2000 sq m to be divided into 4- 5 subsections	This will bring more revenue to the council and affordable housing will become possible. Civic resources and infrastructure will get better use and quick repairs.
PC39	General	Amend	Sections if the outer suburbs are too big such as Kinloch and Acacia Bay area. Any section over 3000 sqm can be subdivided into 4 plus sections.	This will bring more revenue to the council and affordable housing will become possible. Civic resources and infrastructure will get better use and quick repairs.



First name: Jennifer
Last name: Molloy-Hargreaves

On behalf of:
 Select an option...

Postal address:
Suburb:
City:
Country: New Zealand

Email: jmthth@gmail.com

Daytime Phone: 021588587

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File
Submission for TDC

1st Submission on Plan Change 42

We own 1667 Poihipi Road and would like this to be included in the Rural Lifestyle category as it has 4 ha properties' on three boundaries.

Just up the road there are numerous 4 ha properties and also a 1 ha property within 500 metres of our gate.

If we could put a second dwelling on this 4ha property for staff we would be able to keep 1663 Poihipi Road as food producing productive land going forward.

2nd Submission on Plan Change 42

We own 658 Tukairangi Road and we would like this to be included in the rural lifestyle category as there are several 4 ha blocks on the boundary and we would like to have our family on their own land near us and it would be much better if this was a permissible activity rather than having to apply for a resource consent. And this fits in with the current land use surrounding our property.

This will also allow for succession planning for our 4 children, 14 grandchildren and 12 Great grandchildren

Other plan changes – We are fully supportive of proposed Plan change 38, 39, 40, 41 and 43

Yours sincerely

Jennifer Molloy-Hargreaves

Organisation:

Classic Builders Lakes District

First name: Paul**Last name:** Taylor**Postal address:** 218 Te Ngae Road**Suburb:** Ngapuna**City:** Rotorua**Country:** New Zealand**Postcode:** 3010**Email:** paul.taylor@classicbuilders.co.nz**Daytime Phone:** 021-705825

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Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions**Provision:** Plan Change 39 - Building Coverage - Residential Environment > Plan Change Provisions**Points: 24.1****What decision are you seeking from the Council? What action would you like: Retain?****Delete? Amend?****Support**

Retain

Include reason(s) for your submission point

We believe this will enable better design outcomes for our clients and improved site utilisation in the interim whilst the comprehensive review is underway.

Proceed with proposed increase of the maximum building coverage from 30% to 35% as a step given there is a more comprehensive review of the residential provisions underway, where we would support a maximum building coverage of 40% being introduced.

Provision: Plan Change 41 - Removal of Fault lines > Plan Change Provisions

Points: 24.2

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Delete

Include reason(s) for your submission point

Proceed with proposed removal of the fault lines from the planning maps and references to the Fault line Hazard Area from the District Plan provisions. We support the use of more accurate GNZ information rather than rely on dated information in the District Plan

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.2 Minor residential units

Points: 24.3

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain

Include reason(s) for your submission point

We support the provision for minor dwellings as a permitted activity. The The proposed rules are consistent with many councils around New Zealand and will enable intergenerational families to be able to live closer together in more affordable accommodation.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.7 Minor residential units

Points: 24.4

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain

Include reason(s) for your submission point

We support the provision for minor dwellings as a permitted activity. The The proposed rules are consistent with many councils around New Zealand and will enable intergenerational families to be able to live closer together in more affordable accommodation.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.3 General Rules - Rural Lifestyle Environment > 4b.3.2 Minor residential units

Points: 24.5

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain

Include reason(s) for your submission point

We support the provision for minor dwellings as a permitted activity. The The proposed rules are consistent with many councils around New Zealand and will enable intergenerational families to be able to live closer together in more affordable accommodation.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments

Points: 24.6

What decision are you seeking from the Council? What action would you like: Retain? Delete?
Amend?
Support

Retain

Include reason(s) for your submission point

We support the separation of the two environments to better reflect the activities and land sizes within each environment.

Attached Documents

File

No records to display.

**Organisation:**

Waikato Regional Council

First name: Joao Paulo**Last name:** Silva**Postal address:****Suburb:****City:****Country:** New Zealand**Email:**

joaopaulo.silva@waikatoregion.govt.nz

Daytime Phone: 079497179

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Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

File
Waikato Regional Council submission on proposed plan changes 38-43 to the Taupo District Plan

File No: 25 12 00
 Document No: **25169795**
 Enquiries to: Joao Paulo Silva



9 December 2022

Taupō District Council
 30 Tongariro Street, Taupō 3330

Email: districtplan@taupo.govt.nz

Private Bag 3038
 Waikato Mail Centre
 Hamilton 3240, NZ

waikatoregion.govt.nz
 0800 800 401

Tēnā koe,

Waikato Regional Council Submission on the Proposed Plan Changes 38-43 (PPC38-43) to the Taupō District Plan

Thank you for the opportunity to make a submission on the Proposed Plan Changes 38-43 (PPC38-43) to the Taupō District Plan. Please find attached the Waikato Regional Council's submission. The submission has been signed under delegation by the Director of Science, Policy and Information. Waikato Regional Council looks forward to being involved in further discussion regarding the development of the plan changes.

Should you have any queries regarding the content of this document please contact Joao Paulo Silva, Senior Policy Advisor, Policy Implementation directly on (07) 9497179 or by email joapaulo.silva@waikatoregion.govt.nz.

Nāku iti noa, nā,

Tracey May
Director, Science Policy and Information.

Submission from Waikato Regional Council on the Proposed Plan Changes 38-43 (PPC38-43) to the Taupō District Plan

9 December 2022

Introduction

1. Waikato Regional Council (WRC) appreciates the opportunity to make a submission to the Proposed Plan Changes 38-43 (PPC38-43). WRC's primary interest is in relation to the Waikato Regional Policy Statement (WRPS). District Plans, including Plan Changes such as this one, are required to give effect to the RPS (RMA s75(3)(c)).
2. The key areas of interest relate to the proposed rezonings for industrial and rural lifestyle development and potential issues regarding development in and adjoining gully systems. The key issues are listed in the body of the submission. The table below lists a range of submission points regarding the proposed provisions of PPC38-43.

Submitter details

Waikato Regional Council
Contact person: Joao Paulo Silva (Policy Implementation)
Email: joaopaulo.silva@waikatoregion.govt.nz
Phone: (07) 9497179

Post: Private Bag 3038
Waikato Mail Centre
Hamilton 3240

I could not gain an advantage in trade competition through this submission
I am not directly affected by an effect of the subject matter of the submission that:
(a) does not adversely affect the environment; and
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Proposed industrial areas – Taupō Industrial Environments - Plan Change 43

3. **WRC opposes the proposed rezoning of sites 4 and 7 for industrial development. We recommend TDC to assess areas for development that do not pose risks for Significant Natural Areas (SNAs) and for Significant Geothermal Features (SGFs) and are free from geothermal hazards as these can pose risks for human health.**
4. In feedback provided in June 2022, WRC recommended that TDC should explore areas for industrial development avoiding high class soils and geothermal features as this is directed under the WRPS. We understand that TDC assessed eight different areas that could be potentially suitable for industrial development. Out of the eight areas assessed, TDC is proposing to rezone the two highest ranked areas, being sites 4 and 7.
5. The assessment undertaken displaying the industrial land options appears to be driven from an economics lens, with Significant Natural Areas (SNAs) and geothermal features being grouped into the “constrained land” criterion. As a consequence, there was not a comprehensive analysis of effects on Significant Geothermal Features (SGFs) and SNAs. The assessment made no mention of “avoiding adverse effects” or “protecting the significant values” of SNAs and SGFs and included little recognition of the uniqueness of these features. We note that more detailed maps with the sites would have facilitated this assessment. It would be helpful to see maps of each of Site 4 and Site 7, zoomed in/large scale to show the SNAs and SGFs as well as the Wairākei-Tauhara Geothermal System boundary.
6. We consider that the two proposed areas are not appropriate for industrial development. Site 4 adjoins SGFs and SNAs and there is a significant risk of industrial uses encroaching into these sensitive and unreplaceable environments. In addition, site 4 has identified issues connected to geothermal hazards. According to the Geotechnical report¹ provided by TDC, the site was partially included in the hot ground hazard area in a preliminary assessment by Cheal, 2018, and has possible geothermal vents. Site 7 overlaps the hot ground hazard area, and it adjoins a residential environment.
7. Sites 4 and 7 are within the Wairākei-Tauhara Geothermal System, this geothermal system is classified as a Development Geothermal System under the WRPS and the Waikato Regional Plan (WRP). Please see map 21 of the WRPS and Policy 7.4 of the WRP². Method GEO-M15 of the WRPS explicitly directs regional and district plans to avoid adverse effects on Development Geothermal Systems from development and land use.
8. Further, the WRPS contains provisions relating to the care and protections of SGFs, including GEO-01, GEO-P1, GEO-P2 and GEO-P5. GEO-01 promotes the sustainable management of regional geothermal resources by protecting some characteristics of these resources from significant adverse effects, while GEO-P1 provides for managing the effects of development and land use on the regional geothermal resources. Policy GEO-P2 recognises the significance of geothermal features and provides for the protection of geothermal systems. Policy GEO-P5 specifically relates to the protection of Significant Geothermal Features.
9. Furthermore, WRC is concerned about the risks to human health that could be caused by development in hot ground areas. The Section 32 report³ states that:

‘Hot ground and geothermal gases are problematic for development but also have human health implications. Geothermal gases within the soil must be considered during development, with appropriate mitigation measures put in place.

¹ [Microsoft Word - TIPC - Geotechnical Assessment Addendum Report Rev A \(PD review\) \(taupodc.govt.nz\)](#)

² [Waikato Regional Plans](#)

³ [Industrial PC43 S32.pdf \(taupodc.govt.nz\)](#)

Hydrothermal eruptions are also possible within geothermally active areas and are known to have occurred in the Broadlands Road area, most recently in 1981. High pressure geothermal pressure features such as geysers are extremely hazardous to life and development.'

10. The geotechnical report was a preliminary desktop assessment and requires further investigation to fully understand the risks of the sites. We understand that TDC has provided an amendment to subdivision rule 4h.3.7 to further assess the sites during the consenting stage. However, we consider that a more comprehensive approach with a full assessment of sites 4 and 7 would be more appropriate than assessing lots during the consenting stage. We consider that a comprehensive assessment would assist in understanding the risks for each site prior to rezoning. Below is an extract of the conclusion of the geotechnical report:

'Whilst a desktop assessment is appropriate to screen sites for potential hazards, a ground investigation is required to further define the risk that those geohazards pose to industrial development'.

11. In addition, WRC has identified potential issues regarding air quality in connection to site 7. The Taupō airshed, as per the National Environmental Standards for Air Quality, is classified as a polluted airshed as a result of exceedances of the PM₁₀ standard. While the evidence indicates that domestic home heating is the main contributor to exceedances of the PM₁₀ standard in Taupō, transport and industry emissions will also contribute to these exceedances. Depending on the type of industry or commercial activity that is established in this zone there is potential for air quality effects on the adjacent residential area. For example, dust discharges associated with large unsealed sites with truck movements or grain drying and animal feed delivery and storage or odorous activities such as asphalt plants or composting or waste transfer stations.
12. The potential for effects on the neighbouring residential area could also be exacerbated at times by the prevailing wind direction from the northeast. Therefore we recommend that if zone area 7 is established for industrial activity, controls are put in place for ensuring that only light commercial activities with sealed or vegetated sites are permitted. If the intention is to permit heavier industry, then a planted buffer zone would need to be developed to maintain an adequate separation distance as well as providing mitigation of air quality impacts on any future residential development, with the added requirement for sealed or vegetated surfaces on yards within the industrial zone to reduce dust potential.
13. Further we note a potential error with the proposed wording for subdivision rule 4h.3.7. We assume that the intent of the rule is to capture sites 4 and 7, by applying the rule to the Sensitive Land Overlay within Section 14 SO 40438782 and Lot 1 DP 445148. We note that site 4 matches the legal description for Section 14 SO 40438782 and Lot 1 DP 445148 is a site adjoining proposed site 4. We recommend TDC includes site 7's legal description (Lot 2 DP499406) in the rule as well as any adjoining site to site 7 subject to any geothermal hazard. Further, we recommend TDC extends the scope of the rule capturing all sites adjoining the hot ground hazard area, regardless of the connections to this plan change. This will achieve a better overall protection for human health and development.
14. Considering the risks regarding potential losses of biodiversity and geothermal features in connection to developing areas adjoining SNAs and SGFs and the risks associated with geothermal hazards and air quality we oppose the rezoning of proposed sites 4 and 7. We recommend that preferably TDC assesses areas for development that do not pose risks for SNAs and SGFs and do not pose a risk for human health. This position is consistent with our previous feedback.
15. If further assessing other areas is not possible, we recommend TDC to fully assess the risks associated with the sites, including risks associated with geothermal hazards for both sites and risks

of industrial development encroaching on the adjoining SNAs and SGFs to site 4. TDC should then only rezone the parts of the sites that are free from geothermal hazards and must provide strict controls to manage development within and adjoining sites 4 and 7, including provisions for buffers protect the SNAs and SGFs from encroachment and buffers to mitigate air quality issues as well as setbacks for buildings from the hot ground hazard area. In terms of mitigating air quality issues, plan provisions must only allow for light commercial activities as permitted activities with a permitted standard ensuring sites are sealed or vegetated. Heavier industry activities, should have at least a restricted discretionary activity status with matters of discretion ensuring planted buffer zones to maintain an adequate separation distance between buildings and the residential environment while providing for the mitigation of air quality impacts on any future residential development. This should be done by including a requirement for sealed or vegetated surfaces on yards within the industrial zone to reduce dust potential. Further, TDC should amend subdivision rule 4h.3.7 to include the legal description for site 7, being (Lot 2 DP499406).

The proposed rezoning for lifestyle – General Rural and Rural Lifestyle Environments – Plan Change 42

16. **WRC opposes the rezoning of the lifestyle areas. It was considered that there is no demand for rural lifestyle in the Taupō district. In addition, there is the risk associated with land fragmentation and potential losses of productive land, including losses of highly productive land. This will result in a dispersed pattern of development with associated infrastructure and climate change issues.**
17. The economic assessment provided by Property Economics⁴ for the proposed chapter states that overall, there is sufficient development capacity for meeting demand over the next 30 years. This will be primarily within the district's settlements but also within the existing rural lifestyle localities. The report concluded that both growth scenarios analysed would overprovide lifestyle development resulting in dispersed development and losses from intended growth areas that would be unnecessary when providing for the projected additional households. The economic assessment recommends that TDC focuses on providing sufficient capacity to accommodate current rural lifestyle demand and not seek to develop a policy framework that aims to fuel lifestyle growth. We consider that the proposed rezoning is economically driven with the intent to attract more people to the district.
18. WRC considers that having areas of land for lifestyle living in the rural zone can be problematic as it causes car dependency and consequential increases in greenhouse gas emissions as well as issues associated with infrastructure. The WRPS promotes co-ordinated growth and infrastructure. Policy UFD-P2 1(d) provides for management of built environments by ensuring that new development does not occur until appropriate infrastructure is provided to service the development.
19. Policy UFD-P8 recognises Taupō District 2050 and provides for the management of future growth, including in (c) *'avoiding urban development in the rural environment outside of the identified urban growth areas to prevent a dispersed pattern of settlement and the resulting inefficiencies in managing resources.'* Further, in (d) the policy is quite directive in *'avoiding the cumulative effect that subdivision and consequent fragmented land ownership can have on the role of the urban growth areas in providing the supply of land for urban development.'* We consider that fragmenting rural land has the potential to prevent productive uses; once land is subdivided for lifestyle living there is the potential of losing its productive capacity. We are also concerned that having disconnected large areas rezoned for lifestyle living would have a negative impact on the urban growth pattern of the district.

⁴ [Appendix 5 to the S32 Taupo Rural Lifestyle Economic Assessment.pdf \(taupodc.govt.nz\)](#)

20. Furthermore, method UFD-M5 of the WRPS directs rural-residential development away from natural hazards, primary production, and high-class soils. The now in force National Policy Statement for Highly Productive Land (NPS-HPL)⁵ is very directive on the avoidance of rezoning for highly productive land (Policy 6 and Clause 3.7). The Section 32 report⁶ mentions that part of the proposed rezoning is on highly productive land and that TDC will provide an assessment of the NPS-HPL concurrently with this process. TDC has not provided a measurable quantity of the loss of HPL. We would like to see an assessment of the rezoning of HPL for lifestyle living considering the NPS-HPL and WRPS provisions for managing high class soils.
21. We consider that a map displaying relevant features associated with the proposed areas for rezoning would enable a more comprehensive assessment of the proposed rezoning. This should include LUC classification, SNA, SGF and hazards overlays. WRC has requested TDC to provide a spatial layer of the proposed lifestyle areas so we could better assess the proposal. In addition to the layers mentioned earlier, we also need to understand if there are any potential issues regarding any WRC's assets in the area. At the time of preparing this submission, we have not received the information. Therefore, it was difficult for WRC to fully assess the proposed rezoning. Consequently, we oppose the rezoning of the lifestyle areas. Our position may change once we are able to better assess this proposal.

Development associated with gully systems – General Rural and Rural Lifestyle Environments – Plan Change 42

- 22. WRC recommends that the gully systems must be identified and mapped, especially where land use intensifies and encroaches on gullies. Development within and adjacent to gullies should be avoided. Further, WRC recommends the protection of gullies to prevent erosion.**
23. WRC provided feedback on the pre-notification stage for PPC38-43. Part of the feedback related to potential issues associated with development in and near gully systems. As mentioned in the feedback dated 13 June 2022, there is significant risk of gully erosion from increased stormwater flows from new developments. Pumice geology is a specific characteristic of the Taupō district, and these gullies have a higher risk of erosion. This issue can be exacerbated by increased hard surfaces and the resulting increased stormwater runoff volume and velocity. WRC recommended that development should be avoided within and adjacent to the gullies systems. TDC provided a response rejecting our recommendation as it was considered impractical to map all gullies in the rural environment.
24. Further to the issues raised in the feedback, we consider there is the risk of an increased frequency of high intensity weather events as a result of climate change and this could further increase the risk of erosion. Therefore, it is essential to identify and map the gullies and prevent development in and adjacent to these gullies. This could be achieved by identifying and mapping the gullies and requiring building setbacks from gully edges in the district plan. This will achieve alignment with the WRPS principle specific to rural-residential development (h): *'be recognised as a potential method for protecting sensitive areas such as small water bodies, gully-systems and areas of indigenous biodiversity.'* We understand the significance of this work and offer our support for identifying and mapping the gullies. WRC has provided support for Hamilton City Council (HCC) for mapping gullies and we consider we can provide valuable support for identifying and mapping the gully systems in TDC's proposed new areas for rural lifestyle. To this effect, WRC can work in collaboration with TDC from now until the hearings phase of this process to address this issue.
25. We reiterate our recommendation for TDC to avoid any development within or adjacent to gully systems. Development in this sense includes erecting buildings and other infrastructure within and

⁵ [National Policy Statement For Highly Productive Land 2022 \(environment.govt.nz\)](https://www.environment.govt.nz/nps/nps-hpl-2022)

⁶ [Microsoft Word - Final Section 32 Evaluation Report - PC42 -Rural Chapter.docx \(taupodc.govt.nz\)](#)

adjoining gully systems. Further, WRC recommends the retirement of all natural gullies and that they are protected with appropriate vegetation cover. This will ensure stormwater conveyance does not result in accelerated erosion. Retirement would include no grazing and a minimum 5 metre setback for fencing, buildings, and driveways. In addition, we recommend that vehicle crossings across natural gullies should be either culverts, or bridges in accordance with the Waikato Regional Council Best Practice Guidelines for Waterway Crossings⁷ and any stormwater outflows into gullies must be suitably engineered to prevent erosion in and around the outflow site.

⁷ [Waikato Regional Council Best Practice Guidelines for Waterway Crossings \(waikatoregion.govt.nz\)](https://www.waikatoregion.govt.nz/~/media/00000000-0000-0000-0000-000000000000/00000000-0000-0000-0000-000000000000.pdf)

26. SUBMISSION ON the Proposed Plan Changes 38-43 (PPC38-43)

Text that is shown as underlined is proposed to be added. Text shown with ~~strikethrough~~ formatting is proposed to be deleted.

Plan Section	Support/Oppose	Relief sought	Reasons
Strategic Directions – Plan Change 38			
Section 2.3 at paragraph 2	Support with amendments	Review and reword the second paragraph of Section 2.3.	The second sentence needs rewording as it appears to be missing words. Currently the second paragraph in the section does not make sense.
Section 2.3.2, Objective 1(a)	Support with amendments	Reword the objective as follows: a. contributes to well-functioning and compact urban forms <u>environments</u> that provide for connected liveable communities;	We consider that changing the word ‘forms’ to ‘environment’ will encompass more than the built components of the urban areas. Further, this wording is more consistent with the NPS-UD which focuses on well-functioning urban environments. We note that in the Section 32 report the term ‘urban form’ was used to refer to the likely change in amenity. However, we consider it would be more appropriate to be more explicit about changes in amenity due to increased density/height not being an adverse effect. Please refer to IM-09 – Amenity in the WRPS Change 1.
Objective 2.3.2 (1)	New objective	Include a new bullet point to Objective 2.3.2(1) to read: <u>ensures the protection of Significant Geothermal Features including geothermal vegetation.</u>	WRC considers that the protection of geothermal features should be acknowledged in the Plan. Taupō and Tokaanu are the only two towns in New Zealand apart from Rotorua that overlie large geothermal systems and have within the town rare and fragile geothermal features. The environmental imperative to protect such features should be acknowledged in the Plan.
Objective 2.3.2	New objective	Include a new bullet point to Objective 2.3.2(1) to read: <u>ensure that building, roading and infrastructure developments are directed away from geothermal hazards.</u>	WRC understands that Taupō and Tokaanu overlie geothermal resources. WRC has identified a potential risk regarding potential adverse effects on property and infrastructure if these are placed in areas prone to geothermal subsidence, including at the base of geothermally unstable slopes such as the Hipaua Steaming Cliffs at Tokaanu-Waihi, or on heated ground.

			Therefore, we recommend including a new bullet point to Objective 2.3.2(1).
Policy 2.2.3 (3)	Support with amendments	Amend the wording to read: Recognise and provide for the vision, objectives, and <u>outcomes, and values</u> in Te Ara Whanui o Rangitāiki (Pathways of the Rangitāiki) and Te Kaupapa Kaitiaki documents and to give effect to Te Ture Whaimana o Te Awa o Waikato - the Vision and Strategy for the Waikato River.	WRC considers the policy should be amended to achieve better consistency with Section 181 of the Ngāti Tuwharetoa Claims Settlement Act 2018.
Policy 2.3.3 (7)	Support with amendments	Amend the wording as follows: 7. Provide for the development of Papakāinga <u>and supporting services on</u> māori land to facilitate māori occupation on their ancestral lands.	We consider that including ‘and supporting services’ after papakāinga on (7) will give better effect to WRPS Method UFD-M21 which provides for sustainability of marae and papakāinga and directs district plans to take into account the need for additional services to support papakāinga.
Policy 2.3.3 (11)	Support with amendments	Amend the wording as follows: 11. Require the design and location of activities to avoid or mitigate natural hazards to an acceptable level of <u>current and future risks</u> to life, property and the environment.	WRC considers that the term ‘current and future risk’ should be included to the policy to ensure that climate change is adequately considered. This will achieve alignment with WRPS Change 1- IM-O5 – Climate change.
2.3.3 Policy	New Policy	Include new policy (or similar) as follows: <u>Avoid new development and subdivision of areas in close proximity to Significant Geothermal Features as mapped in the Waikato Regional Plan.</u>	WRC considers that the protection of geothermal features should be acknowledged in the Plan. Taupō and Tokaanu are the only two towns in New Zealand apart from Rotorua that overlie large geothermal systems and have within the town rare and fragile geothermal features. The environmental imperative to protect such features should be acknowledged in the Plan. This will achieve better alignment with the WRPS.

2.5 Strategic Direction 5 Significant and Local Infrastructure, 1st bullet point	Support with amendment	Amend text to read: "State highways (1, 5, <u>30</u> , 32, 41, <u>46</u> and 47)."	WRC has identified that State highways 30 and 46 are missing from the text. We consider that the reference should be included.
2.5 Strategic Direction 5 Significant and Local Infrastructure, 4 th bullet point	Support with amendment	Amend wording by changing the percentage from 20% to 27% and providing wording that recognises the local and national importance of Taupō's electricity-producing capability.	WRC considers that the Taupō District provides 27% of the national total electricity (using 2020 figures). Almost all of this comes from geothermal and hydro. Geothermal will increase with the Tauhara II development and proposed Ngā Tamariki expansion. In addition, a large solar farm is planned for the district. The District Plan should explicitly recognise the importance of the district's electricity-generating capacity to the local and national economy.
2.6 Strategic Direction 6 Natural Environment Values	Support with amendment	Amend wording after the first sentence to include the sentence: <u>Our rare habitats include 42% of the nation's geothermal vegetation, a rare and vulnerable ecosystem type.</u> And include a new policy in 2.6.3. to read: <u>Map as SNAs all geothermal areas that meet the Waikato Regional Policy Statement definition of SNA, and ensure their protection.</u>	WRC understands that the Taupō District contains most of the country's geothermal vegetation. However, this rare and vulnerable ecosystem type is not appropriately referred to in the chapter. Further, we understand that a review of the SNA framework is out of scope of this process. However, we note that all geothermal areas that meet the WRPS definition of SNA should be mapped as SNA when appropriate. Therefore, we consider it appropriate to include a new policy to the chapter now. WRC recommends including a new policy in 2.6.3.
General		Include provisions to address the following to give effect to NPS UD, WRPS and Change 1: <ul style="list-style-type: none"> • Urban development supports emissions reduction through urban form, design and location. • New development is located in and around existing settlements. • Enable a diverse range of dwelling types and sizes. 	WRC considers that the chapter should give better effect to the NPS-UD and WRPS change 1.

		Responsiveness to proposals that provide significant development capacity with reference to WRPS Change 1 UFD-M74 – Tier 3 out of sequence or unanticipated development and APP14 – Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Non-Future Proof tier 3 local authorities).	
Section 32 report – strategic direction		Amend wording in the report to appropriately connect Plan Change 1 to the WRP, instead of WRPS.	4.6.1 incorrectly states that Plan Change 1: Healthy Rivers is a change to the WRPS. This is a change to the Waikato Regional Plan (WRP). The first change to the WRPS is WRPS Change 1 for NPS UD and Future Proof Strategy update which was notified 18 October 2022.
General Rural and Rural Lifestyle Environments – Plan Change 42			
General Rezoning for Lifestyle blocks	Oppose	Not to rezone the proposed areas in the rural environment to lifestyle environment. Provide a map displaying significant overlays associated with the proposed areas for rezoning, including LUC classification, SNAs, SGFs and hazards overlays.	Please see the comments in the body of this submission.
General Development in gully systems		All gully systems with the proposed are to be identified and mapped such that any prospective landowner would have certainty. Further, the plan change to include rules to ensure that any development is excluded from the gully areas, and that should any development be allowed that a resource consent is required.	Please see the comments in the body of this submission.
Rules 4b.5.1i, 4b,5,2i, 4b.5.3i and 4b.5.6i and matters of control/discretion	Oppose in part	Change the activity status of the rules and include text as below: <ul style="list-style-type: none"> (a) Rules 4b.5.1i, 4b,5,2i, 4b.5.3i and 4b.5.6i should be changed to restricted discretionary activities; and (b) The matters over which the Council retains discretion for each rule should include the following (or similar): 	WRC considers the subdivision rules do not adequately take account of the possibility that the potential for natural hazards on particular land may render the land entirely unsuitable for residential development, particularly when the potential effects of future climate change are also considered. WRC is increasingly finding that land, for which subdivision consent has been obtained, is unsuitable for

		<p><u><i>The suitability of the subject land for residential purposes having particular regard to its existing and future susceptibility to natural hazards, including consideration of the potential exacerbation of such effects due to climate change.</i></u></p>	<p>development due to its susceptibility to significant natural hazards, particularly flooding.</p> <p>In WRC’s submission, as noted above, this is a fundamental issue concerning the suitability of land use that falls within the ambit of territorial functions to consider in their decision-making. We are concerned that the relevant subdivision rules do not account for this.</p> <p>Controlled activity rules 4b.5.1i, 4b.5.2i, 4b.5.3i and 4b.5.6i enable subdivision of land in various circumstances. The first three of those rules are subject to matters of control which include reference to natural hazards:</p> <p><i>b) The identification of any natural hazards or contaminated sites and how these may affect the stability of the land and suitability of any future building sites, including any information provided by a suitably qualified person whose investigations are supplied with the subdivision application.</i></p> <p>Rule 4b.5.6i does not include reference to natural hazards at all.</p> <p>Irrespective, in all cases, given these are controlled activities, there is no ability to decline any subdivision application under these rules, including for reasons related to the land’s existing or future susceptibility to natural hazards.</p>
Matters of control and discretion	Oppose in part	Include a reference to “natural wetlands” to the matters of control and discretion for the proposed controlled and restricted discretionary activity rules for subdivision.	WRC highlights that the National Policy Statement for Freshwater Management 2020 (NPSFM) and the National Environmental Standards for Freshwater 2020 (NESF) came into force in September 2020. Together, these instruments provide a national policy and regulatory framework to ensure the identification and protection of “natural wetlands” (among other things). ⁸ More specifically, this includes ensuring that <i>the loss of extent of natural wetlands</i>

⁸ Refer 2.2 Policy 6, policies 3.22 and 3.23 of the NPSFM; and Regulations 37-56 of the NESF.

			<p><i>is avoided, their values are protected, and their restoration is promoted</i> except in specified circumstances. The WRPS and regional plans are required to be consistent with this policy direction and district plans are required to have regard to the objectives and policies of regional policy statements and plans. The Regulations apply to various activities on land (including vegetation clearance, earthworks and land disturbance when those activities occur within, or within specified distances of natural wetlands), some of which would clearly fall within the scope of rules in the District Plan. To the extent that these activities may occur in the absence of subdivision, they will be managed via the Regional Council which has a direct rule to implement these regulations. However, we submit that, in respect of the controlled and restricted discretionary activity rules for subdivision, there must be appropriate reference to potential effects on natural wetlands that may occur as a natural consequence of the subdivision and use of land for residential (or other) developments. This would enable such effects to be addressed at the subdivision consent stage where appropriate and subdivision designed in such a way as to avoid impacts on existing wetlands.</p>
Matters of control and discretion	Oppose in part	Include a reference to gully erosion to the matters of control/discretion for the proposed controlled and restricted discretionary activity rules for subdivision.	<p>WRC notes that recently developers have wished to use highly erosive gully systems for stormwater management and infrastructure. In many cases, this will exacerbate erosion, creating risks to both the development in question, and downstream infrastructure and property. There are occasions where interference with the gully systems should simply be avoided in the development design proposals. Also, many gully systems are protected under Land Improvement Agreements with WRC, protection which is threatened by their use for subdivision purposes.</p>
Taupō Industrial Environments – Plan Change 43			

<p>Overall</p> <p>Rezoning of proposed sites 4 and 7</p>	<p>Oppose</p>	<p>That site 4 and site 7 are not rezoned for industrial purposes. This is our preferred relief. If not possible to assess other areas for industrial development, that TDC only rezones parts of the sites that are free from geothermal hazards and provide strict controls to manage development within and adjoining sites 4 and 7, including planted buffers protecting the SNAs and SGFs from development and buffers to mitigate air quality issues as well as setbacks from the hot ground overlay. Further, plan provisions must only allow for light commercial activities as permitted activities with a permitted standard ensuring sites are sealed or vegetated. Heavier industry activities, should have at least a restricted discretionary activity status with matters of discretion ensuring planted buffer zones to maintain an adequate separation distance between buildings and the residential environment while providing for the mitigation of air quality impacts on any future residential development. This should be done by including a requirement for sealed or vegetated surfaces on yards within the industrial zone to reduce dust potential. Further, TDC should amend subdivision rule 4h.3.7 to include the legal description for site 7, being (Lot 2 DP499406) as per the point below.</p>	<p>Please see the comments in the body of the submission.</p>
<p>Subdivision rule 4h.3.7</p>	<p>Oppose in part</p>	<p>Amend the rule as follows: 4h.3.7 Any subdivision of land identified as “Sensitive” within the Taupō Industrial Environment is a discretionary activity and will be subject to the recommendations of appropriate technical assessments including, but</p>	<p>Please see the comments in the body of the submission.</p>

		<p>not limited to: a geotechnical assessment, and an ecological assessment where the activity affects land identified as a Significant Natural Area. In applying this Rule to the Sensitive Land Overlay within Section 14 SO 40438782 and Lot 1 DP 445148 and Lot 2 DP499406, the assessment must be informed by deep geotechnical investigation and shall also include, but not be limited to:</p> <ul style="list-style-type: none"> • establishing a ground temperature profile starting from the margins of the Hot Ground Hazard Area (District Plan maps); • determination of the groundwater profile and susceptibility to liquefaction and risk of subsurface water flows; • establishing an understanding of the most likely future state of thermal features; and • a stormwater management plan. 	
General			
General		Give regard to Change 1 to the WRPS as a 'proposed policy statement' in the proposed plan changes.	<p>Change 1 to the WRPS has been notified and so is a 'proposed policy statement'.</p> <p>District Councils are required, when preparing a change to the district plan, to have regard to the WRPS under section 74(2)(a)(i) of the RMA.</p>
National Planning Standards		Update PPC38-43 to the new plan format provided with the National Planning Standards 2019.	WRC considers that PPC38-43 should follow the new plan format provided with the National Planning Standards.

Further Information and Hearings

27. WRC wishes to be heard at the hearings for the Proposed Plan Changes 38-43 (PPC38-43) in support of this submission and is prepared to consider a joint submission with others making a similar submission.
28. WRC could not gain an advantage in trade competition through this submission.



First name: Peter

Last name: Hill

Postal address:

Suburb:

City:

Country: New Zealand

Email: peterhill09@gmail.com

Daytime Phone:

- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I 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 the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

File
PDF - Peter Hill - District Plan Submission

Nikki Donaldson

From: peter hill <peterhill09@gmail.com>
Sent: Saturday, 3 December 2022 6:56 AM
To: District Plan
Subject: Re: residential site coverage for proposed Taupo district plan

Categories: Nikki

Caution: This email originated from outside of the organisation. Do not click links, open attachments, or respond unless you recognise the sender and know the content is safe.

Hi Hilary

No I do not wish to speak at a hearing .

No, I would not gain advantage in trade competition via my submission .

thanks for other info
 regards
 Peter Hill

On Fri, Dec 2, 2022 at 11:00 AM District Plan <districtplan@taupo.govt.nz> wrote:

>
 > Hi Peter
 >
 > In order to comply with the Resource Management Act I need your answers to the following questions please:
 >
 > * Would you like to speak at a hearing? Yes/No
 > * Could you gain an advantage in trade competition through this
 > submission? Yes/No
 >
 > The second question above is about (for example) a supermarket submitting against another supermarket because they don't want to have to compete with it. So 9 times out of 10 the answer is no.
 >
 > In relation to the 30m2 - that's for building consents, not resource consents. I have attached a link with more info on that below:
 >
 > <https://www.building.govt.nz/projects-and-consents/planning-a-successful-build/scope-and-design/check-if-you-need-consents/building-work-that-doesnt-need-a-building-consent/new-building-consent-exemptions/#:~:text=The%20new%20exemptions%20will%20mean,or%20supervised%20design%20and%20construction.>
 >
 > Hilary Samuel Senior Policy Advisor
 > Taupō District Council • 30 Tongoriro Street, Taupō 3330 Private Bag
 > 2005 • Taupō Mail Centre • Taupō 3352 • New Zealand D +64 7 376 1591
 > T +64 7 376 0899 M 021 208 2573 Follow us on Facebook and Twitter
 > www.taupo.govt.nz
 >
 > -----Original Message-----
 > From: peter hill <peterhill09@gmail.com>
 > Sent: Wednesday, 30 November 2022 4:16 PM
 > To: District Plan <districtplan@taupo.govt.nz>
 > Cc: peter hill <peterhill09@gmail.com>
 > Subject: residential site coverage for proposed Taupo district plan

>
> Caution: This email originated from outside of the organisation. Do not click links, open attachments, or respond unless you recognise the sender and know the content is safe.
>
>
> HI
> The proposed site coverage for residential from 30% to 35% i fully support 35%. the 5% increase .
>
> Clarificationawhile back rules changed for residential that
> 30m2 could be added to your house without council consent if work undertaken met current planning /building codes ,please clarify this please .
> thanks
> regards
> Peter Hill
> [<https://contentapi.datacomsphere.com.au/v1/h%3Ataupodc/repository/libraries/id:25026fn3317q9slqygym/files/id:2jvgin1211cxbyrmo7p1>]
> www.taupodc.govt.nz/
>
> WARNING
> This message may contain privileged and confidential information intended only for the use of the addressee named above. If you have received this message in error, please notify the Taupo District Council immediately. Phone +64 7 376 0899[X].
> This email (with or without any attachment) is not an official statement or formal document of the Taupo District Council unless otherwise stated and cannot necessarily be used in any legal, formal or official circumstance.

First name: Terry
Last name: Palmer
Postal address: 364 Tukairangi Road
Suburb: Nukuhau
City: Taupo
Country: New Zealand
Postcode: 3385
Email: yrretremlap@gmail.com

Daytime Phone: 0276064399

- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I 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 the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision: Plan Change 38 - Strategic Directions

Points: 38.1

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Support

Retain as supported

Include reason(s) for your submission point

I agree we need a structured strategic direction going forward. Population growth is not going backwards anytime soon worldwide and if we can identify and plan for the growth and stick to the rules then it has to be great for the area.

- Freshwater - yes to protection of all our waterways and lakes going forward, with even stricter rules in the future.
- Urban form and development - it has to be structured and planned with no 'lemons'. The wider character has to remain intact and agree that fragmented development needs to be avoided.
- Yes to Papakainga direction.
- Yes, infrastructure development goes hand in hand with all development going forward. The arterial highway was a great example of great infrastructure planning. I think if

there is hesitation on infrastructure development because of cost then think again. Look at Transmission Gully in Wellington - this idea was mooted many years ago and discounted as it was considered too expensive. Any project is cheap NOW. If you keep delaying then its only going to get more expensive. An example of this is if you are going to open up more subdivision in say Nukuhau down to Acacia Bay then a second bridge complete with cycle/walking would have to be a part of the development. It would seem expensive now but in 20 years it would have been cheap, or should I say, it will be much more expensive in 20 years time.

Provision: Plan Change 39 - Building Coverage - Residential Environment > Plan Change Provisions

Points: 38.2

What decision are you seeking from the Council? What action would you like: Retain?

Delete? Amend?

Support

Retain

Include reason(s) for your submission point

Is makes sense, and reduces workload of the council to review applications to go outside the coverage area.

Provision: Plan Change 40 - Taupō Town Centre Environment > 3s Taupō Town Centre Environment > Policies

Points: 38.3

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Seek amendment

Amend this rule so that the increase only applies to the town centre environment [and perhaps industrial] and not residential, general rural, or rural lifestyle.

For these private areas [residential, rural, or rural lifestyle] where people live, the current rule of 3 temporary activity days be reduced to two, one, or no temporary activity days.

Include reason(s) for your submission point

I support the need for an increase in temporary activities days, and non-operational temporary activity days, BUT only for the town centre environment.

The proposed District Plan has suggested a blanket temporary activities rule for the district, but I feel this blanket rule will have the potential to allow other non-desirable activities to happen in areas not suited to the temporary activity. For example, in general rural, new rural lifestyle and residential areas where there is no need to have temporary activities. these have the ability to take place another 5 days per year, up from 3 to 8 days.

I feel it is inappropriate to increase the temporary activity rule over the district as a whole. I agree with changing the rule for town/public areas but not or private areas where people live, ie, residential, rural, rural lifestyle.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.3 Temporary Activities

Points: 38.4

What decision are you seeking from the Council? What action would you like: Retain?

Delete? Amend?

Seek amendment

Amend.

Remove the blanket rule for the District and amend this temporary activity rule to be -

- for General Rural Environment and Rural Lifestyle Environment - a total of 1 or 2 operational days in a year, with 3 or 4 non operational days
- for Town Centre and maybe Industrial Environments - the new rule

Include reason(s) for your submission point

There has been a change from allowing 3 operational days in any one calendar year to 4 operational days in any 6 month period, or to look at it another way, 8 operational days in a year – an increase of 5 days, or 167% increase.

If you are promoting clusters and increased density within those clusters with the new Rural Lifestyle Environment then why are you proposing to allow more rule-breaking?

What is the purpose of rules if you are going to allow 15% of a calendar year a free period where one doesn't have to abide by the rules? [my calculation – say 8 Saturdays out of 52 – that's 15%]. Potentially 8 weekends in prime summer where the new rural environments could be ruined by undesirable activities that create noise, crowding, traffic, parking problems and the like - activities that would be better suited to the town centre, industrial or public environments.

However, for the town centre environment I can see the benefits of having temporary activities. It is already a public area and there is really not a greater impact on private peoples lives by increasing the number of days of temporary activities.

I believe that there would be very few properties in a new Rural Lifestyle Environment that would require an allowance for a temporary activity due to their size and the fact that they are private properties. The current rule is more suited to public areas, town centre, or industrial zone.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments

Points: 38.5

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

Yes it makes sense that with population growth there will be increased demand for lifestyle living.

I agree that it's better to keep good farm land producing something like food than just sporadic housing.

However with increased density there would need to be rules and standards that would be similar to residential zoning so that land holders within the new rural lifestyle environment cannot go ahead with an activity that would be more suited in an alternative environment.

I see you have addressed some objectives and policies in relation to the new rural lifestyle environment and in particular -

- 3b.3.3 the avoidance of commercial and industrial activities that are incompatible with the residential activities within the new environment, and,
- 3b.3.8 managing the character of the new environment.

Overall it is good to see that you have recognised the unique character of rural lifestyle living and I agree this character can continue to be the same with more housing density.

However, the proposed rules and standards may not have gone far enough to protect this unique environment.

Refer to the actual rules and standards of Plan Change 42 below and see my submissions.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.3 General Rules - Rural Lifestyle Environment > 4b.3.5 Temporary Activities

Points: 38.6

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend.

Remove the blanket rule for the District and amend this temporary activity rule to be -

- for General Rural Environment and Rural Lifestyle Environment - a total of 1 or 2 operational days in a year, with 3 or 4 non operational days
- for Town Centre and maybe Industrial Environments - the new rule

Include reason(s) for your submission point

There has been a change from allowing 3 operational days in any one calendar year to 4 operational days in any 6 month period, or to look at it another way, 8 operational days in a year – an increase of 5 days, or 167% increase.

If you are promoting clusters and increased density within those clusters with the new Rural Lifestyle Environment then why are you proposing to allow more rule-breaking?

What is the purpose of rules if you are going to allow 15% of a calendar year a free period where one doesn't have to abide by the rules? [my calculation – say 8 Saturdays out of 52 – that's 15%]. Potentially 8 weekends in prime summer where the new rural environments could be ruined by undesirable activities that create noise, crowding, traffic, parking problems and the like - activities that would be better suited to the town centre, industrial or public environments.

However, for the town centre environment I can see the benefits of having temporary activities. It is already a public area and there is really not a greater impact on private peoples lives by increasing the number of days of temporary activities.

I believe that there would be very few properties in a new Rural Lifestyle Environment that would require an allowance for a temporary activity due to their size and the fact that they are private properties. The current rule is more suited to public areas, town centre, or industrial zone.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.4 Performance Standards - Rural Lifestyle Environment > 4b.4.13 Maximum Noise - Limits

Points: 38.7

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Amend the noise levels for 10pm to 7am to 20dBA nd 40dBA max

Include reason(s) for your submission point

I note you propose to bring the noise limits down 5-10 dBA during the hours 7am to 10pm, but the night noise 10pm to 7am remains the same at 40dBA with a 70dBA max.

Noise travels very far at night in the country, especially bass sound, and I feel that because of this, and that noise is seldom made at night, that these dBA values from 10pm to 7am could almost be halved without any effect on anybody. 99% of people don't make noise or have a desire to make noise.

I feel you could reduce the noise levels from 10pm at night for the General Rural Environment and Rural Lifestyle Environment due and in doing so would deter those with a desire to make noise in those times from making it.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.9 Maximum Noise - Limits

Points: 38.8

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Amend the noise levels for 10pm to 7am to 20dBA nd 40dBA max

Include reason(s) for your submission point

I note you propose to bring the noise limits down 5-10 dBA during the hours 7am to 10pm, but the night noise 10pm to 7am remains the same at 40dBA with a 70dBA max.

Noise travels very far at night in the country, especially bass sound, and I feel that because of this, and that noise is seldom made at night, that these dBA values from 10pm to 7am could almost be halved without any effect on anybody. 99% of people don't make noise or have a desire to make noise.

I feel you could reduce the noise levels from 10pm at night for the General Rural Environment and Rural Lifestyle Environment due and in doing so would deter those with a desire to make noise in those times from making it.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.4 Performance Standards - Rural Lifestyle Environment > 4b.4.1 Vehicle movements

Points: 38.9

What decision are you seeking from the Council? What action would you like: Retain?

Delete? Amend?

Seek amendment

Amend part (i) to read '30 equivalent vehicle movements per day for the allotment'

Include reason(s) for your submission point

The original proposal was for 24 equivalent vehicle movements per day for an allotment.

This equates to 12 movements two and from, which is adequate.

Occasionally there may be a small stock truck or contractor which should easily be covered by the 24.

This was changed to 50 in this draft which is excessive for this new lifestyle environment - look at it as being residential with more space between houses, rather than rural. It won't have traffic other than the people living in the dwellings.

Attached Documents

File
No records to display.



First name: Sean

Last name: te Heuheu

On behalf of:
Tuwharetoa Settlement Trust

Postal address: PO Box 1845

Suburb:

City: Taupo

Country: New Zealand

Postcode: 3351

Email: sean@tst.maori.nz

Daytime Phone: 021 616 438

- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I 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 the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

File
TDC Plan Change submission TST

Tūwharetoa Settlement Trust Submission 06 December 2022

Plan Change	Specific part/provision	Support? Oppose? Amend?	Relief sought	Reasons
Plan Change 39- Residential Building Coverage	Performance Standard 4a.1.1 Maximum Building Coverage 35%	Support	Support the increase in building coverage from 30% to 35% for the Residential Environment.	Tūwharetoa Settlement Trust supports the increase in building coverage to 35% as this better reflects building requirements in the residential environment today.
	Future Plan Change	Support	Support the provision for papakāinga development within the Taupō District.	Tūwharetoa Settlement Trust welcomes discussion with Council in the preparation of a substantive plan change for the residential environment that provides for papakāinga development within the residential environment.
Plan Change 40- Taupō Town Centre	Service Lane Map	Support	Support the identification of the laneway/service lane, located to the South and West of 11 Tūwharetoa Street, Taupō on the Taupō District Council Planning Maps	Tūwharetoa Settlement Trust supports the recognition through Plan Change 40 that verandas should not be required on building frontages adjacent to service lanes.
	Service Lane Map	Support	Support the identification of the laneway/service lane, located to the South and East of 85 Tūwharetoa Street, Taupō on the Taupō District Council Planning Maps	Tūwharetoa Settlement Trust supports the recognition through Plan Change 40 that verandas should not be required on building frontages adjacent to service lanes.
	Service Lane Map	Support	Support the identification of the laneway/service lane, located to the South and West of 81 Tūwharetoa Street, Taupō on the Taupō District Council Planning Maps	Tūwharetoa Settlement Trust supports the recognition through Plan Change 40 that verandas should not be required on building frontages adjacent to service lanes.
	Taupō Town Centre Environment Height Overlay Map	Support	Support the Pedestrian Precinct Height Overlay of 18m as it applies to 11 Tūwharetoa Street, Taupo	Tūwharetoa Settlement Trust agrees that additional height in this location is appropriate, particularly given the recent approvals for building heights in this area.
	Performance Standard 4g.1.9 Maximum Building Height	Support	Support the provision for additional height in accordance with the Taupō Town Centre Environment Height	Tūwharetoa Settlement Trust seek to retain the provision for additional height in the heart of the Taupō town

Plan Change	Specific part/provision	Support? Oppose? Amend?	Relief sought	Reasons
	<p><u>The maximum height of any building shall be as follows:</u></p> <p><i>i. Total Maximum height of three (3) floors above ground level except where provided by (ii) below:</i></p> <p><i>ii. The maximum height of any building shall be in accordance with the Taupō Town Centre Environment Height Overlays in the planning maps.</i></p>		Overlays, particularly as it relates to 11 Tūwharetoa Street, Taupō.	centre to enable more diverse and intensive development and utilize space in an effective way.
	<p>Performance Standard 4g.1.10 (i)</p> <p><u>Taupō Town Centre Environment Height Overlay</u></p> <p><i>i. Any building, or part of any building, located within the Taupō Town Centre Environment Height Overlays in the planning maps that exceeds a total height of (3) floors above ground level.</i></p> <p><i>ii. Any application arising from this rule shall not be limited or publicly notified.</i></p>	Amend	<p>Delete 4g.1.10 (i) and (ii).</p> <p>4g.1.10 Taupō Town Centre Environment Height Overlay</p> <p><i>i. Any building, or part of any building, located within the Taupō Town Centre Environment Height Overlays in the planning maps that exceeds a total height of (3) floors above ground level.</i></p> <p><i>ii. Any application arising from this rule shall not be limited or publicly notified.</i></p>	<p>Tūwharetoa Settlement Trust considers that the purpose and practical application of Performance Standard 4g.1.10 as currently worded is unclear.</p> <p>Non-notification of height increases, above the Taupō Town Centre Environment Height Overlays is not supported, as it removes the ability of genuinely affected parties from being part of the resource consent process in relation to height.</p> <p>Clarification is needed over which applications will be considered on a non-notified basis. Until such time as clarification is provided, it is sought that 4g.1.10 be deleted.</p>
		Amend	Amend the proposed the non-notification clause for height increase in accordance with the Taupō Town Centre Environment Height Overlays under 4g.1.10(ii).	Tūwharetoa Settlement Trust consider that the non-notification of applications to exceed the height specified in the Taupō Town Centre Environment Height Overlays, particularly for those properties fronting Roberts Street which are permitted to be developed to 12m, is not appropriate as it does not enable

Plan Change	Specific part/provision	Support? Oppose? Amend?	Relief sought	Reasons
	<p>Performance Standard 4.g.1.12 (as renumbered)</p> <p><i>All buildings must provide a veranda that extends the full length of the site frontage along any road (except frontage to service lanes as shown on the planning maps) or identified laneway; and ...</i></p>	Support	Support the requirement to not require verandah's to be added on the frontage of buildings adjacent to service lanes.	genuinely affected parties to be party to the resource consent process. Tūwharetoa Settlement Trust supports the intent of the change to focus pedestrian frontages and shop fronts along roads and not the working areas of buildings such as service lanes which has the potential to obstruct access through these service lanes and presents additional cost to building owners.
	<p>Performance Standard 4.g.1.16 (as renumbered)</p> <p><i>All buildings must provide a veranda that extends the full length of the site frontage along any road (except frontage to service lanes as shown on the planning maps); and...</i></p>	Support	Support the requirement to not require veranda's to be added on the frontage of buildings adjacent to service lanes.	Tūwharetoa Settlement Trust supports the intent of the change to focus pedestrian frontages and shop fronts along roads an not the working areas of buildings such as service lanes which has the potential to obstruct access through these service lanes and presents additional cost to building owners.
Plan Change 42 – General Rural and Rural Lifestyle Environments	<p>Definitions – Section 10 Papakāinga</p> <p><i>Any dwelling or dwellings and associated social (including health), cultural and economic activities on Māori land which is owned by the whanau, hapū or iwi, that enables the occupation of that land by members of the same whanau, hapū or iwi.</i></p> <p><i>- Māori land is within the meaning of Section 129 (1) (a, b or c) of the Te Ture Whenua Māori Land Act 1993, and</i></p> <p><i>- Is consistent with any license to occupy Māori land that has been issued by the Māori Land Court</i></p>	Support	Support the retention of a clear definition for papakāinga housing which enables the development of land by our whanau.	Tūwharetoa Settlement Trust supports the provision of papakāinga development in the Taupō District.

Plan Change	Specific part/provision	Support? Oppose? Amend?	Relief sought	Reasons
	Objective 3b.2.7 – Papakāinga <i>Whanau, hapū and iwi can use and develop ancestral land for Papakāinga, and Papakāinga are of a form and scale that considers the functioning of the General Rural Environment.</i>	Support	Support the retention of a clear objective for papakāinga development within the Taupō District.	Tūwharetoa Settlement Trust supports the provision of papakāinga development in the Taupō District.
	Objective 3b.2.8 – Tāngata Whenua <i>The important relationship that tāngata whenua have with their ancestral lands and the wider Rural Environment is recognised and provided for</i>	Support	Support the retention of the objective as proposed to recognise our important relationships with our ancestral lands.	Tūwharetoa Settlement Trust supports the acknowledgement through the objective of the importance of our relationships with our ancestral lands.
	Policy 3b.2.16 – Papakāinga <i>i. Provide for the development of Papakāinga on Māori land ii. Recognise the social and cultural benefits of the occupation and development of Papakāinga by whanau, hapū and iwi on Māori land iii. Allow for Papakāinga on General land owned by Māori where it can be demonstrated that there is an ancestral connection to the land and the land will remain in Māori ownership or be converted to Māori freehold title.</i>	Support	Support the retention of a clear policy for papakāinga development within the Taupō District.	Tūwharetoa Settlement Trust supports the provision of papakāinga development in the Taupō District.
	Policy 3b.2.17 Māori Cultural Activities <i>i. Support Māori cultural activities undertaken by or associated with whanau, hapū or iwi that are in accordance with their tikanga. ii. Recognise the importance of mātauranga Māori, kaitiakitanga and tikanga Māori in land use and land management activities</i>	Support	Support the retention of a clear policy that recognises and supports Māori cultural activities and the importance of recognising mātauranga Māori, kaitiakitanga and tikanga Māori in land use and land management activities in the Taupō District.	Tūwharetoa Settlement Trust support the proposed policy which recognises and supports Māori cultural activities and the importance of mātauranga Māori, kaitiakitanga and tikanga Māori in land use and land management activities.

Plan Change	Specific part/provision	Support? Oppose? Amend?	Relief sought	Reasons
	<p>General Rules 4b.1.6 – Papakāinga</p> <p><i>i. Papakāinga on Māori customary land and Māori freehold land which complies with all of the performance standards in 4b.2 is a permitted activity</i></p> <p><i>ii. Papakāinga on Māori customary land and Māori freehold land which does not comply with one or more performance standard in 4b.2 is a Restricted Discretionary activity</i></p> <p><i>iii. Papakāinga on general land owned by Māori is a Restricted Discretionary activity</i></p> <p><i>iv. Applications under Rules 4b.1.6 ii or iii will not be notified.</i></p> <p>When considering activities under Rule 4b.1.6 ii and iii Council restricts the exercise of its discretion to the following matters:</p> <p><i>a. Those performance standards in 4b.2 which the proposal does not comply with</i></p> <p><i>b. Any effects on the functioning of the rural environment including effects on rural infrastructure.</i></p> <p><i>c. For 4b.1.6 iii, in addition to a and b:</i></p> <p><i>a. Historical associations of the land to mana whenua and reasons why the land was given general title</i></p> <p><i>b. Whether the land can be converted to Māori title under Te Ture Whenua Act 1993</i></p> <p><i>c. Any documents or mechanisms provided by the applicant to</i></p>	<p>Support with amendments</p>	<p>Support the permitted activity standard for papakāinga on Māori customary land and Māori freehold land as proposed.</p> <p>Seek to amend 4b.1.6(ii) and (iii) to provide for papakāinga housing as a controlled activity rather than a restricted discretionary activity. Subsequent amendment to the matters of discretion is also sought as follows (additions underlined, deletions strikethrough):</p> <p><i>i. Papakāinga on Māori customary land and Māori freehold land which complies with all of the performance standards in 4b.2 is a permitted activity</i></p> <p><i>ii. Papakāinga on Māori customary land and Māori freehold land which does not comply with one or more performance standard in 4b.2 is a Restricted Discretionary-Controlled activity</i></p> <p><i>iii. Papakāinga on general land owned by Māori is a Restricted-Discretionary Controlled activity</i></p> <p><i>iv. Applications under Rules 4b.1.6 ii or iii will not be notified.</i></p> <p>When considering activities under Rule 4b.1.6 ii and iii Council restricts the exercise of its discretion <u>control</u> to the following matters: ...</p>	<p>Tūwharetoa Settlement Trust supports the permitted activity status for papakāinga housing on Māori customary land and Māori freehold land and considers that a controlled activity status for papakāinga housing provides greater certainty for our whānau wishing to develop papakāinga housing that their applications will be approved, subject to conditions through a resource consent.</p> <p>The amendments sought are more closely aligned with our housing strategy.</p>

Plan Change	Specific part/provision	Support? Oppose? Amend?	Relief sought	Reasons
	<i>demonstrate that the land will be secured for permanent Māori administration and maintenance of the land title.</i>			



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- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I 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 the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

None.

Consultation Document Submissions

Provision: Plan Change 39 - Building Coverage - Residential Environment

Points: 46.1

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

That if the council approves an increase in the building coverage maximum for new (and I guess this means

established sections in the applicable area) it must set up a measurable target, and meet it, for the planting of large trees and - where size is impractical - gardens on road verges, median strips and parks and reserves.

As an example, for every section where the new max building coverage applies, the council should have to plant and maintain a minimum of two large trees (growing to at least 10m in height) on a nearby green space with initial preference given to the road verge or road median adjacent to the section in question.

As an offset, the trees that can't be accommodated close to the section in question should be planted in town.

Residential Building Coverage

An increase in Residential Building Coverage will lead to more run off from hard surfaces, this has to be mitigated in some way.

It will also lead to less room on sections for trees and playing areas for children. This can be mitigated by more open space reserves and tree plantings.

New developments should be required to have open treed space in mitigation.

Another mitigation for this would be stronger protection for trees on both private and public land.

Too many traffic islands are concreted over. Too many road verges don't have trees. In road planning more consideration should be given to planted medians to calm traffic and provide shade.

The council should be by its actions encouraging the care of older family members by their children (in the community). This move could assist in that but needs to be accompanied by changes to the rating system for water and rubbish rates where a house provides two joined but separate living areas - one for the use of older parents.

Include reason(s) for your submission point

The larger you make the allowable house coverage of a residential site the less room there is for gardens and trees that will reduce the visual impact of the built environment and contribute to soaking up carbon. People with small sections generally find large trees hard to manage and look after. Trees provide innumerable benefits to the environment and social and mental wellbeing. This means it is incumbent on the regulating authority which has increased the allowable building coverage percentage to provide these large trees on verges, road medians and parks and reserves ie the relief sought by this submission.

Provision: Plan Change 38 - Strategic Directions

Points: 46.2

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

It is time for the council to adopt degrowth as an overarching philosophy. Degrowth is a planned and democratic reduction of unnecessary production in rich countries designed to bring the economy back into balance with the living world in a safe and equitable way.

To me this would involve a sincere and dedicated commitment to a reduction in energy use and the installation of devices that unnecessarily use reticulated energy when a different design could take advantage of human

energy, greater emphasis on green buildings (better insulation, use of natural solar warming etc, the catching and use of roofwater) and the provision of green spaces and trees. More use of timber as a construction material rather than concrete and steel.

Limits on unnecessary lighting, heating and air conditioning in public buildings and office buildings where better design such as having openable windows would suffice.

Bans on consumer goods that fail to meet standards for recyclability or repairability. Council compost collections for those who can't or won't compost themselves. Penalties for those who don't sort their household refuse adequately, penalties for builders and developers who don't sort and reuse/or recycle waste or leftover building materials.

Trees planted on every roadside verge in the Taupo town area and in the medians in open car parks.

That the Council promote self-contained wastewater systems such as worm based ones to mitigate increased wastewater from subdivisions

Benefits include:

drip feeding low level nutrients to the soil gradually

less landfill as some of these systems can compost as well

resilience for the homeowner

reduction in water use for irrigation as household water is recycled

ecologically sound

reduced pressure on existing council wastewater infrastructure

sustainable

NZ companies promoting this technology include wormsmart.nz, biolytix.com, naturalflo.co.nz

Tukairangi Trust strongly supports the Waikato Regional Council feedback in it's entirety as below and including comment 142

1. Waikato Regional Council (WRC) appreciates the opportunity to make a submission to the first bundle of plan changes (FBPCs). WRC's primary interest is in relation to the Waikato Regional Policy Statement (WRPS). District Plans, including Plan Changes such as this one, are required to give effect to the RPS (RMA s75(3)(c)).
2. WRC is supportive overall of the draft framework for the first bundle of plan changes. We believe the new set of provisions has the potential to reduce the number of resource consent applications in some instances. This will reduce regulatory red tape and achieve better outcomes for the community. WRC is supportive overall of the draft framework for the first bundle of plan changes. We believe the new set of provisions has the potential to reduce the number of resource consent applications in some instances. This will reduce regulatory red tape and achieve better outcomes for the community.
3. However, WRC considers that there are areas in the draft framework that require further analysis from TDC. One of WRC's concerns is regarding subdivision provisions. The rule framework does not consider the possibility of natural hazards making land unsuitable for development. We also consider the framework should capture the potential effects of future climate change on development. In addition, we note the importance of having a reference to natural wetlands and gully erosion in the matters of control and discretion for the draft controlled and restricted discretionary activities. Please see our table below for full details
4. WRC also considers there should be provisions in the FBPCs directing development away from natural gully systems and that gully vegetation should be managed to avoid exacerbating actual or potential erosion (and related) risks.
5. Another concern is in relation to new industrial areas being proposed within and adjoining Significant Natural Areas (SNAs) and Significant Geothermal Features (SGFs). We consider there is a significant risk for loss of indigenous biodiversity and adverse effects in the geothermal features, including the loss of geothermal vegetation. Therefore, WRC recommends TDC considers other areas for industrial development that would not pose a risk for local indigenous biodiversity and geothermal features.

Comment on Strategic Directions

2.4 4 Climate Change

Statement

in NZ GHG emissions from transport were up 62.1% from 1990. Transport emissions are the fastest growing source of GHG emissions in NZ. Nearly 70% of all transport CO₂ are from cars, SUV's vans and light trucks. A typical passenger vehicle emits 4.6 tonnes of CO₂ /year.

2.4.2 Objective

1. Subdivision, use and development of land in the Taupō District will result in positive climate change outcomes.

Question , How can the inevitable higher emissions from increased vehicle movements from increase in population from Rural Lifestyle subdivision, travelling to town be reconciled with this objective?

Suggestion-Unless a toll is imposed on private vehicle use and this used to subsidise public transport.

2.4.3 Policy

1. Land use activities which create positive climate change outcomes will be supported and encouraged.
2. Land use activities which will unduly accelerate the effects of climate change will be discouraged.
3. Subdivision use and development of land must demonstrate resilience to the effects of climate change over time.
4. Urban and built development must be designed in a manner which considers the need to reduce greenhouse gas emissions associated with that development and resulting land use.

2.4.3. 1 Question. How can this ever be measured and who will measure it? Unless an Energy Audit or Emissions budget is provided for a change in land use.

2.4.3. 2 Surely any type of subdivision/development that does not offset emissions by tree planting or buying carbon credits will not result in positive climate change outcomes.

The only development of land that would result in positive climate change outcomes would be land use change to forestry or retirement and revegetation of some kind.

2.4.3 3 As WRC feedback ; Subdivision use land development that encroaches on natural ephemeral waterways, wetlands or LIAs that are prone to erosion will not be resilient to climate change.

2.4.3 4 Considering the need to reduce GHG in urban and built development will not result in reduction in GHG emissions. It has to be done in practice. Who will police these designs ?

The only design that would reduce GHG emissions would be use of wood products in design and construction.

2.5 STRATEGIC DIRECTION 5 SIGNIFICANT AND LOCAL INFRASTRUCTURE

2.5.2 Objectives

1. The wider benefits and strategic importance of significant infrastructure to the District and nationally, are recognised in decision making and land use planning.
2. The sustainable development, operation, maintenance and upgrading of renewable electricity generation resources and activities are recognised and encouraged.
3. Land use in the District will not reduce the safe and effective functioning of significant and local infrastructure.
4. Local and national transport infrastructure located in the Taupō District operates in a safe and effective manner.

Suggestion - have an objective that encourages reductions in power consumption to reduce the need for building more power stations

and vehicle movement to reduce GHG emissions and make roads safer

2.6 STRATEGIC DIRECTION 6 NATURAL ENVIRONMENT VALUES

2.6.2 Objectives

1. Recognise the importance of the district's natural values and landscapes and their significance to the Taupō Districts communities and identity.
2. The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna from the adverse effects of inappropriate development.
3. Activities which will lead to the enhancement of indigenous biodiversity values will be recognised and provided for.
4. Recognition of the extent of indigenous vegetation and habitat under Māori land tenure, and the need to provide for the important relationship of Māori and their culture and traditions with their ancestral lands and waahi tapu.
5. The protection of outstanding landscape areas from inappropriate land use and development which may adversely affect their landscape attributes.
6. Recognition of the relationship of tāngata whenua with the natural values of their ancestral lands, waterbodies, sites, cultural landscapes, and other natural taonga of significance.

7. The natural character of riparian margins are preserved, and enhanced where appropriate, and protected from inappropriate subdivision, use and development.

2.6.3 Policy

1. Protect areas of significant indigenous vegetation and significant habitats of indigenous fauna from land use and development activities that will have more than minor effects on the ecological values and processes important to those areas.
2. Support and facilitate those activities which will lead to the long term protection and or enhancement of indigenous biodiversity values. Ch2 Strategic Directions draft for consultation_.docx 1
3. Recognise and provide for tāngata whenua in their role as kaitiaki of the natural values on their lands and the wider district. 4. Development must not have any more than minor adverse effects on the attributes of identified outstanding landscape areas.
5. Encourage the protection, enhancement and restoration of indigenous biodiversity, including by supporting opportunities for tāngata whenua to exercise their customary responsibilities as mana whenua and kaitiaki in restoring, protecting and enhancing areas of indigenous biodiversity.
6. Ensure that activities within outstanding natural features and landscapes recognise and maintain their important values and characteristics. 7. Support opportunities for tāngata whenua to exercise their customary responsibilities as mana whenua and kaitiaki in respect of the features or landscapes.
8. Recognise the contribution made by landowners to the protection and enhancement of areas of natural values and landscapes.

Question 2.6.2. 3 How will activities that lead to the enhancement of indigenous biodiversity be specifically provided for ?

Question 2.6.3 2 How specifically will TDC support and facilitate?

Comment ; Industrial Land Supply / Natural Environment Values

The Industrial Zones identified on Broadlands Rd ,adjacent to Broadlands Geothermal Reserve an SNA vested to Iwi is inappropriate without some protection offered .

In the past industrial businesses/properties bordering significant geothermal sites have used them as dumps, excavated within the SNAs or caused fires and damaged geothermal flora. If industrial land is to be zoned by these areas a buffer zone should be afforded or vested for access for essential ecological work, businesses audited for incursion onto SNAs and business owners educated on the ecological significance/ importance and their responsibilities as neighbours to such sites.

The damage caused by the above activities in SNAs with geothermal features are in direct conflict with the objectives designed to protect them.

1. Protect areas of significant indigenous vegetation and significant habitats of indigenous fauna from land use and development activities that will have more than minor effects on the ecological values and processes important to those areas.

Another strange Industrial Zone suggestion is on Poihipi Rd, it doesn't seem appropriate, given the premise to consolidate zones. It is out on a limb in a rural area. It would be easier to make an assessment as to its suitability for industrial zoning if land tenure and proposed use (if known) were made public when calling for submissions.

Include reason(s) for your submission point

The District Plan acknowledges anthropomorphic climate change and that it will have an effect on the people living in the district and the environment itself. Theories that we need population growth for greater wellbeing are questionable and closer to the principle of a pyramid scheme. Financial wellbeing, often of a minority, is but one aspect of a healthy populace.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments

Points: 46.3

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

3b RURAL ENVIRONMENT

Rural Lifestyle.

Encourage harvesting of rain water from roofs to reduce water take from bores and council supply.

Council should be careful allowing subdivision to smaller lots adjacent to Reserves or PCAs. These can impact negatively by dumping garden waste creating weed problems, domestic pets killing native fauna, cutting down or poisoning of existing trees within reserves that landowners consider to impede views.

New developments adjacent to PCAs should require buffer areas to be retired or vested to the reserve for access for essential environmental and other work.

4b.5.7 Subdivision – Outstanding Landscape Areas

i. Any subdivision of land in the General Rural Environment or Rural Lifestyle Environment that is located within an Outstanding Landscape Area where the resulting lots are less than 10 hectares, is a non-complying activity.

Comment - there should be no exceptions to this rule. Outstanding Landscape Areas are important to maintain character.

If landowners genuinely want to improve environmental outcomes the ultimate would be revegetation with native forest species.

4b.5.3 Subdivision – Rural Lifestyle Environment that does not adjoin the General Rural Environment

- i. Subdivision resulting in lots that are 2 hectares or larger that do not adjoin the General Rural Environment is a controlled activity.
- ii. Subdivision resulting in lots that are smaller than 2 hectares that do not adjoin the General Rural Environment is a non-complying activity.

In the planning map Rural Lifestyle 919 in the case of 3/864 Tukairangi Road the adjoining properties seem to be included in the Rural Lifestyle area ie. coloured orange when they should not be included in this area. There will be an expectation from these landowners that they can subdivide.

Reverse sensitivity and cumulative and precedent effect could be of concern.

Include reason(s) for your submission point

The District Plan acknowledges anthropomorphic climate change and that it will have an effect on the people living in the district and the environment itself.

Provision: Plan Change 40 - Taupō Town Centre Environment

Points: 46.4

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

The inclusion of stricter adherence to green building principles (construction) in any future building development in the towncentre. Reductions in concrete and steel use (unless certified as produced via 'green' processes), with a greater emphasis on new timber technology. This area should be showcasing the use of renewably grown construction timber.

More emphasis on buildings that are greener in terms of their life span. As mentioned elsewhere in this submission, reduced reliance on electrical means to perform functions where human mechanical means would suffice, eg opening windows.

Mandatory waste sorting and collection on an as needs basis (for free) with penalties for shops, restaurants etc that don't sort and reduce waste combined with incentives for those that do.

The careful consideration of maintaining a visible ring of green beyond the town boundary from certain, if not many (including some quite low lying) vantage points in the town. ie Mt Tauhara, the Punatekahi Ridge (Acacia Bay direction) when considering new commercial building height allowances, residential and industrial zones. Being able to see a green (pasture or forested) landscape in the distance gives the town a smaller sense of scale and contributes to mental and social wellbeing for residents.

Towncentre Increased Building Heights

There should be no increase in building heights . Increasing building heights will impact negatively on the character of Taupo.

However because this will probably go ahead regardless , mitigation should be planting of tall trees to reduce the scale and harshness of taller buildings.

Other requirements in line with strategic objectives to reduce GHG emissions etc for allowing taller buildings would be a requirement in design and construction to use a majority timber products. As Scion Building Rotorua.

Extract NZ Farm Forestry Assn

Clearwater Quays was constructed as part of mid-Rise Wood Construction in Christchurch. It appears that using wood in place of concrete to build this five storey building is removing over a million kg of CO2 from the environment.

The timber construction saved 87 400kg of CO2 compared with CO2 release of over 950 000 kg if it had been built of concrete and just under 800 000 kg released if built of steel and concrete.

The cost of design was also lower than for a building of either just concrete or steel and concrete.

Many other benefits NZ timber, lighter, earthquake resilient.

Include reason(s) for your submission point

Acceptance in the plan that councils should consider the impact of their decision making in reducing the drivers of anthropomorphic climate change.

Provision: Plan Change 43 - Taupō Industrial Zone > 4h Taupō Industrial Environment and Centennial Industrial Environment

Points: 46.5

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Comment; Industrial Land Supply / Natural Environment Values

The Industrial Zones identified on Broadlands Rd ,adjacent to Broadlands Geothermal Reserve an SNA vested to Iwi is inappropriate without some protection offered .

In the past industrial businesses/properties bordering significant geothermal sites have used them as dumps, excavated within the SNAs or caused fires and damaged geothermal flora. If industrial land is to be zoned by these areas a buffer zone should be afforded or vested for access for essential ecological work, businesses audited for incursion onto SNAs and business owners educated on the ecological significance/ importance and their responsibilities as neighbours to such sites.

The damage caused by the above activities in SNAs with geothermal features are in direct conflict with the objectives designed to protect them.

1. Protect areas of significant indigenous vegetation and significant habitats of indigenous fauna from land use and development activities that will have more than minor effects on the ecological values and processes important to those areas.

Another strange Industrial Zone suggestion is on Poihipi Rd, it doesn't seem appropriate, given the premise to consolidate zones. It is out on a limb in a rural area. It would be easier to make an assessment as to its suitability for industrial zoning if land tenure and proposed use (if known) were made public when calling for submissions.

Include reason(s) for your submission point

Provision: Plan Change 39 - Building Coverage - Residential Environment

Points: 46.6

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Include reason(s) for your submission point

Provision: Plan Change 38 - Strategic Directions

Points: 46.7

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Include reason(s) for your submission point

Provision: Plan Change 38 - Strategic Directions

Points: 46.8

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Include reason(s) for your submission point

Attached Documents

File
Note on Tukairangi Trust submission

Taupō District Council
Planning Team

Submitters: Peter, Megan and Chris Marshall on behalf of Tukairangi Trust

Kia ora Taupō District Council

Apologies if some of the content in the attached submission is duplicated or not quite under the correct heading but found the system a little difficult to operate. I am confident you can use your common sense and planning expertise to apply our submission points to the correct sections.

Ngā mihi

Chris Marshall
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- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
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directly affected by an effect of the subject matter of the submission that :

- a. adversely affects the environment, and
b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision: Plan Change 39 - Building Coverage - Residential Environment

Points: 48.1

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Oppose

I would like the current site coverage to be retained or reduced.

Include reason(s) for your submission point

Increasing site coverage allowance on residential sites increases the likelihood of reducing neighbours privacy, reducing access to light and sunlight, decreasing quality of life, impeding natural drainage of rainfall, reducing greenery and reducing parking areas. Taupo has an abundance of relatively non-productive land surrounding the township and intensification is not necessary.

Attached Documents

File

No records to display.



First name: Rick

Last name: Keehan

On behalf of:

Enterprise Great Lake Taupo trading as Amplify

Postal address: 32 Roberts Street

Suburb:

City: Taupo

Country: New Zealand

Postcode: 3330

Email: rick@taupo.biz

Daytime Phone: 0211321475

I could

I could not

Gain an advantage in trade competition through this submission

I am

I 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 the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

File
Submission Table - Amplify District Plan Submission 9 December 2022



Submission Table

- We recommend using this submission table to state your submission points. This will assist Council to accurately record your submission points and ensure your submission is valid.

- Each individual submission point should be on a different row. Use as many rows as you require.

- You can attach additional commentary and documents should you need to.

- The examples in italics below are for guidance only to show how submission points could be set out and do not represent a position of Council.

- This form is for use for the following Plan Changes:
 - Plan Change 38 – Strategic Directions

 - Plan Change 39 – Residential Building Coverage

 - Plan Change 40 – Taupō Town Centre Environment

 - Plan Change 41- Removal of Fault lines

 - Plan Change 42 – General Rural and Rural Lifestyle Environments

 - Plan Change 43 – Taupō Industrial Environment Rezoning

Plan Change State which Plan Change that your submission relates (see above)	Specific part/provision State the specific part or provision of the proposed Plan Change your submission relates to. If you cannot give a specific number Council Planners will add this for you.	Support? Oppose? Amend? choose one of the above	Relief sought What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?	Reasons Include reason(s) for your submission point
PC 39 – Residential Building Coverage	4a.1.1 Maximum Building Coverage	Support	Retain	Support the increase to the permitted residential building coverage in most residential environments from 30% and 35%.
PC 40 – Taupo Town Centre Environment	4g.1.9 Performance Standards	Support	Retain	Support the proposal to increase the maximum height permitted in the Taupo district to 12-18 meters in some parts of the town centre.
PC 40 – Taupo Town Centre Environment	4g.1.12 & 6 Verandas	Support	Retain	Support the clarification that 'service lanes' are not subject to requirements for veranda provisioning but the pedestrian frontages and pedestrian laneways system are subject to the veranda requirements.

PC 40 – Taupo Town Centre Environment	4g.2.2 Land Use Rules	Support	Retain	Support the increase in temporary activity rule to help support the development and operation of events and functions which bring economic benefits to the Taupo district.
PC 42 – General Rural and Rural Lifestyle Environments		Support	Retain	<p>Amplify supports the proposal to split the Taupo District Rural Environment into two sections. We believe the General Rural Environment, allowing for additional development for another large property and minor dwelling provides provision for development needs but also maintains large spaces for productive land.</p> <p>The Rural Lifestyle Environment provision delivers on an increased demand for rural lifestyle blocks around the district while provisioning for the effective use of infrastructure.</p>
PC 43 – Taupo Industrial Environment Rezoning		Support	Retain	Amplify supports the changes. We agree that there is a demand and need for additional industrial land within the Taupo District. It is important for the economic growth and development of the region that a suitable supply of appropriate land is available and support the plan to rezone land to either Taupo or Centennial Industrial Environment. We would encourage more industrial land to be made available than just the proposed areas for assessment. This would assist to provide simplicity for development in the future.



First name: Andrea

Last name: Curcio Lamas

On behalf of:
Ryman Healthcare Limited

Postal address:
Suburb:
City:
Country: New Zealand

Email:
andrea.curciolamas@chapmantripp.com

Daytime Phone: 04 498 4919

- I could
- I could not

Gain an advantage in trade competition through this submission

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Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

File
Ryman_-_Submission_on_Taupo_Plan_Changes_38-39_-_December_2022



Form 5

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY
STATEMENT OR PLAN, CHANGE OR VARIATION**

Clause 6 of Schedule 1, Resource Management Act 1991

To: Taupō District Council (*Council*)

Name of submitter: Ryman Healthcare Limited (*Ryman*)

Introduction

- 1 This is a submission on the Council's proposed amendments to the Taupō District Plan (*District Plan*): Proposed Plan Changes 38-43 (*Proposal*) on behalf of Ryman.
- 2 Ryman could not gain an advantage in trade competition through this submission.
- 3 Ryman welcomes this opportunity to provide feedback on the Proposal. This submission builds on its previous submission on the Council's pre-consultation material for the first bundle of plan changes (dated 13 June 2022).
- 4 Ryman supports in full the Retirement Villages Association of New Zealand Incorporated (*RVA*) submission on the Proposal, and in particular Plan Change 38(*PC38*) and Plan Change 39(*PC39*).
- 5 Ryman's previous submission includes an introduction to Ryman, its villages and its residents. While we do not intend to repeat the background information, Ryman seeks that the Council takes it into account when reviewing this submission. This submission focuses on providing additional context to Ryman's interest in and position on the Proposal.
- 6 The submission covers:
 - 6.1 An update on Ryman's villages in Taupō and the wider region; and
 - 6.2 Ryman's position on the Proposal and relief sought.

Ryman's villages in Taupō and the wider region

- 7 As noted in our previous submission, Ryman is the largest provider of retirement village accommodation in New Zealand. Ryman currently has 38 operational retirement villages throughout New Zealand providing homes for more than 12,000 elderly residents.

- 8 Ryman has two retirement villages currently operating in the Waikato region – located in Hamilton, accommodating approximately 1020 residents. Further, Ryman has started construction on their new site in Cambridge and recently purchased a new site in Taupō, located at 179 Acacia Bay Road, Nukuhau. Ryman’s proposed village will offer independent living in townhouses, assisted-living apartments, as well as a full range of care options, including rest home, hospital and specialist dementia care. The village will comprise around 206 new retirement units, 64 assisted living units and 56 aged care units, and will house in the order of 388 residents.
- 9 Ryman expects to continue developing new villages into the future, including in Taupō, to meet increasing demand.

Ryman’s position on the Proposal

- 10 Ryman adopts the RVA’s submission on the Proposal, and in particular in relation to PC38 and PC39. In addition, Ryman wishes to note that any changes to the retirement village planning framework of the District Plan will have a significant impact on Ryman and its plans to continue developing new villages in Taupō into the future to meet increasing demand.

Decision sought

- 11 Ryman seeks the relief sought by the RVA in its submission on the Proposal.
- 12 Ryman wishes to be heard in support of this submission.
- 13 If other make a similar submission, Ryman will consider presenting a joint case with them at the hearing.

Conclusion

- 14 Thank you for the opportunity to submit on the Proposal. Ryman looks forward to engaging with the Council further throughout its review of the District Plan.

Signed for and on behalf of Ryman Healthcare Limited by:

Matthew Brown

General Manager - Development NZ
Ryman Healthcare Limited
9 December 2022

Address for service of submitter:

Ryman Healthcare Limited
c/- Luke Hinchey
Chapman Tripp
Level 34
15 Customs Street West
PO Box 2206
Auckland 1140
Email address: Luke.Hinchey@chapmantripp.com;
Andrea.CurcioLamas@chapmantripp.com



First name: Kirsteen
Last name: McDonald

On behalf of:
 McKenzie & Co

Postal address:
Suburb:
City:
Country: New Zealand

Email:
 kirsteen.mcdonald@mckenzieandco.co.nz

Daytime Phone: 021563066

- I could
 I could not

Gain an advantage in trade competition through this submission

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 I am not

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Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision: Plan Change 40 - Taupō Town Centre Environment > Planning Maps

Points: 61.1

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

Provision: Plan Change 39 - Building Coverage - Residential Environment > Plan Change Provisions

Points: 61.2

What decision are you seeking from the Council? What action would you like: Retain?

Delete? Amend?

Support

Include reason(s) for your submission point

We support the increase in building coverage to 35% and look forward to further changes to the Residential Chapter in the future.

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.1 Performance Standards > 4g.1.9 Maximum Building Height

Points: 61.3

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Support

Retain

Include reason(s) for your submission point

The increase in building height will encourage an intensification and diversification of land use within the Town Centre

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.1 Performance Standards > 4g.1.10 Taupō Town Centre Environment Height Overlay

Points: 61.4

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Seek amendment

Amend wording to simplify.

Include reason(s) for your submission point

Any building within the Taupo Town Centre Environment Height Overlays should be able to develop up to the maximum height specified by the overlay, regardless of the number of floors.

Having more than 3 floors but not exceeding the height limit specified by the overlay should not trigger need for resource consent.

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.1 Performance Standards > 4g.1.12 Verandas

Points: 61.5

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Support

Include reason(s) for your submission point

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.1 Performance Standards > 4g.1.16 Verandas **Points: 61.6**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.2 Land Use Rules **Points: 61.7**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

Provision: Plan Change 40 - Taupō Town Centre Environment > Planning Maps **Points: 61.8**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

Provision: Plan Change 41 - Removal of Fault lines > Planning Maps **Points: 61.9**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > Planning Maps **Points: 61.10**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend Rural Lifestyle Planning Map to include the additional properties identified on the attached plans titled 'Proposed Extension to Lifestyle Zoning' drawing no. 3267-1000 and 3267-1001

Include reason(s) for your submission point

Provides cohesion/uniformity/continuity of character along a road, in a general area.

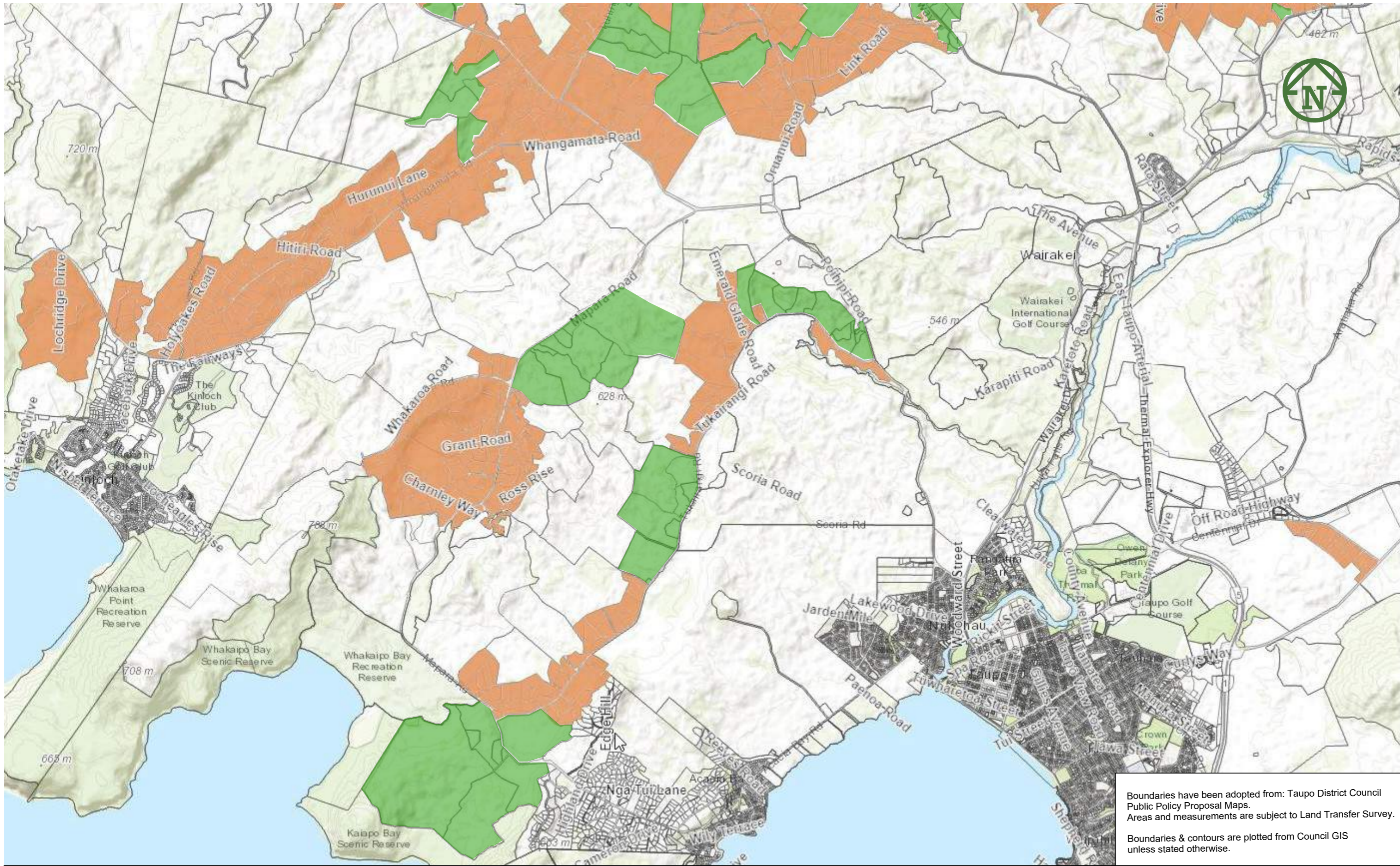
Land is favourable for development as Lifestyle blocks due to size of property, location, topography and soil

quality.

Keeping potential lifestyle areas within proximity reduces the need to extend infrastructure further away from town.

Attached Documents

File
3267-1000
3267-1001



Boundaries have been adopted from: Taupo District Council Public Policy Proposal Maps. Areas and measurements are subject to Land Transfer Survey.

Boundaries & contours are plotted from Council GIS unless stated otherwise.

CLIENT: PROJECT: TITLE: PURPOSE OF ISSUE:



McKenzie & Co

PLAN CHANGE SUBMISSION

PROPOSED EXTENSION OF LIFESTYLE ZONING

INFORMATION

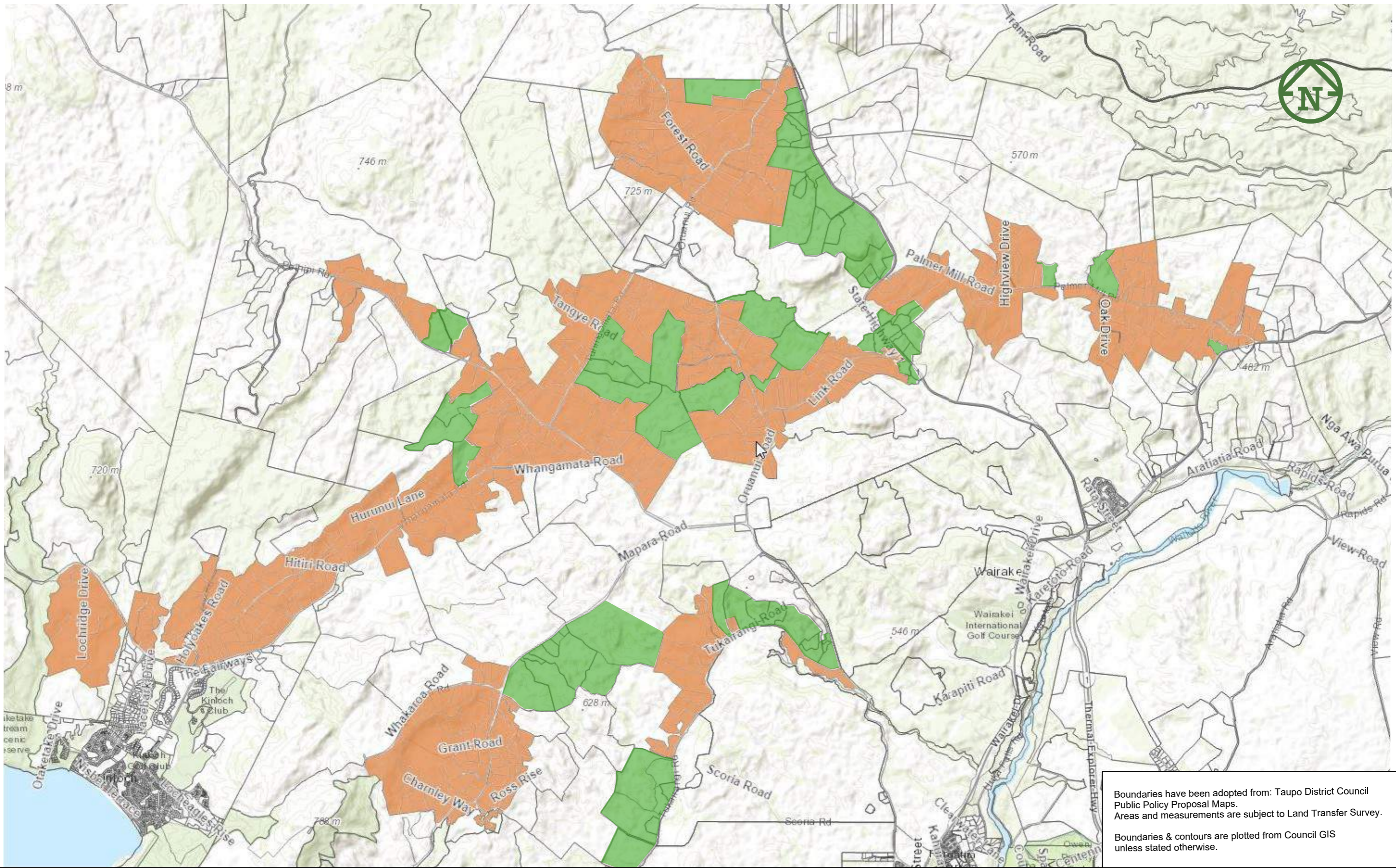
SCALE: 1:3500 @A3

DO NOT SCALE

DRAWING NO: 3267-1000

REV: A

REV	DESCRIPTION	DRN BY	CHK BY	APP BY	DATE
A	FIRST ISSUE	SO	JF	JF	9/12/2022



Boundaries have been adopted from: Taupo District Council Public Policy Proposal Maps.
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CLIENT: PROJECT: TITLE: PURPOSE OF ISSUE:



McKenzie & Co

PLAN CHANGE SUBMISSION

PROPOSED EXTENSION OF LIFESTYLE ZONING

INFORMATION
 SCALE: 1:3500 @A3
 DO NOT SCALE
 DRAWING NO: 3267-1001
 REV: A

REV	DESCRIPTION	DRN BY	CHK BY	APP BY	DATE
A	FIRST ISSUE	SO	JF	JF	9/12/2022

First name: Debs
Last name: Morrison
Postal address: 58 Palmer Mill Road
Suburb: Wairakei
City: Taupo
Country: New Zealand
Postcode: 3384
Email: debsmorr71@gmail.com

Daytime Phone: 0273895278

- I could
 I could not

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Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

If I have to, however I believe my words speak for themselves.

Attached Documents

File
Debs Morrison Submission to Taupo Council
Debs Morrison TJ57NK-DownloadableForm5SubmissionforPlanChange

Submission to Taupo District Council regarding Rezoning

Overarching Statement

I am against rezoning from Rural to Rural -Lifestyle because it will have impact on:

- the character of the **current** Rural living
- current residents, as it will create issues and discontent amongst neighbours
- possibly forces landowners to close their businesses and creates financial hardship
- it will have a negative impact on the landscape and the environment of those areas
- increase of rates due to rezoning .

3b.1 Demand for Rural Properties

Palmer Mill Road Demand

According to Council there is increased demand for rural lifestyle living.

The evidence indicates that the opposite may be true. Many residents have confirmed and expressed their concerns and opposition to Councils rezoning proposal .

There have been 2 properties on the market on and around Palmer Mill Road recently, each of them for longer than 2 months. If the demand for rural properties is as high as Council predicts, one would have thought that those properties would have been sold quickly, as they have done in the last couple of years.

Proximity to Taupo town

The general understanding of a lifestyle property is that they are a buffer zone between rural and urban areas which is not the case for most of the suggested areas. This is certainly not the case for Palmer Mill Road.

Palmer Mill Road is 15 kilometers from Taupo with just Wairakei Village and farmland in between. A dispersed pattern of growth means higher transport costs (economic and environmental) and reduces the choices for suitable transport options.

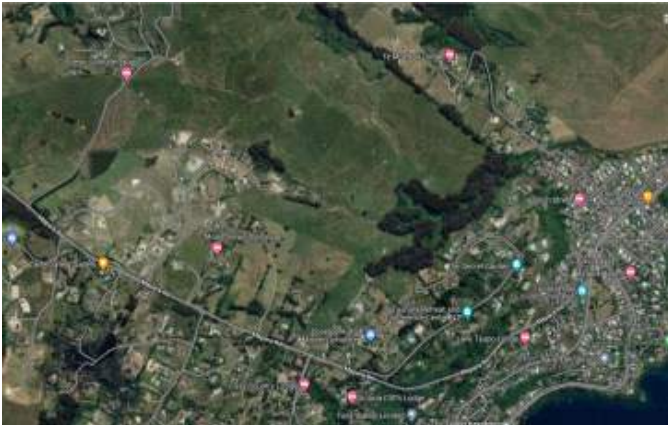
There is no public transport from Palmer Mill Road into town.

Why does Council not consider land boarding on to town for rezoning? We would like to suggest that other areas for further development exist, such as

- both sides of Centennial Drive
- area between Nukuhau and Acacia Bay



- area between Marpara Road Urban neighbourhood and Hill View Drive
- this area already consists of smaller lifestyle blocks, it is in close proximity to town, so it would make sense to extend this further



- area between Lake Terrace, Richmond Ave and SH1



- western side of the lake

According to Statistics New Zealand and Taupo District Plan 2050, there might be a growth until 2030 but after that a more likely decline to the aging population, less births, etc. Therefore, rezoning areas and all the changes and expenses that go with it, seems to be a waste of money, which surely could be invested better in other projects.

3b.3 Environmental Impact

In and around Palmer Mill Road the proposed rezoning will allow the subdivision from around 45 to 150 properties. Adding a minor dwelling to all these properties, would triple the number of houses.

The environmental impact on the area would be great. The possible housing density would destroy rural living and would have a significant impact on the environment resources and certainly have a detrimental aesthetic effect as well.

Most of the properties around this area are between 4 and 20 hectares (plus many huge farms, particularly on the Northern side of the road); why destroy the landscape and put extra pressure on the land. We suggest amending the rezoning to a minimum property size of 4 hectares to minimise the environmental effect, but allowing minor dwellings.

If a minimum size of 4 hectares is not achievable, it is important that the effects of the likely land use change are addressed before change of zoning.

Potential adverse effects on additional buildings are included (see table below). If these issues do not arise initially, most of these points will become an issue in the future.

Effect	Detail
Landform	Earthworks associated with the construction of building platforms, the provision of infrastructure including roads, loss of productive soils, and loss of natural landscape character.
Biodiversity	Vegetation clearance and associated effects on fauna.
Water quality	Vegetation clearance, release of silt and contaminant loadings, stormwater runoff, on-site effluent treatment and disposal systems. But in rural areas, the smaller population size means that services such as water and sewerage treatment plants are less cost-effective.
Infrastructure	Increased demand on stormwater, sewerage, roading, energy, and water supply.
Hazards	The creation of additional allotments within an area susceptible to natural hazards. Environmental hazards that are more likely in rural areas include: <ul style="list-style-type: none"> • untreated drinking-water, which increases the risk of water-borne diseases • contact with livestock, which can carry zoonotic diseases and pollute waterways

Effect	Detail
	<ul style="list-style-type: none"> • lack of tertiary wastewater treatment to kill pathogens in human sewage, which can lead to freshwater and coastal beaches being unsuitable for swimming • lack of reticulated sewerage systems, which can have local environmental impacts (for example, if septic tanks overflow) • longer travel distances to access health services, which can be a barrier to health care.
New boundaries	The height of buildings in relation to boundaries, vehicular access, parking spaces, the provision of public and private infrastructures and the physical changes associated with increased density.
Social and economic	The use of land for different purposes can cause increased demand for infrastructure, community facilities, public and private transport, and a change in amenity values or social coherence.
Restrictions on future land use	Consent notices, covenants and encumbrances on the new allotments (often intended to mitigate adverse environmental effects flowing from subdivision) may dictate the type or nature of any future development.
Land use expectations	Rezoning creates an expectation that subsequent occupation and development will be permitted.
Reverse sensitivity	For example, the establishment of residential settlements sensitive to certain rural activities (such as dust and noise) within an area previously entirely rural.

3b.3.1 Maintain the Character of the Rural Lifestyle

The character of the **current** environment will not be maintained, if property sizes will be reduced, and additional housing will be erected (as pointed out above a potential increase from 45 to 150 properties and three times as many houses).

The impact to the area would be devastating. We would go from a quiet rural neighbourhood to a “Lifestyle” Wharewaka. The land will be more fragmented and less productive and littered with buildings. Council stated in its original letter that ‘buildings are to be separated from each other and not supposed to be dominating the landscape.’ The potential increase in houses would certainly contradict this statement

Traffic within the area will increase. Increased traffic will put increased strain on the environment and will have an impact on safety around the area. More is outlined in the points below.

3b.3.3 Productivity of the land

Initially Council stated in its initial letter, that no subdivision will happen in productive rural areas, it later said that subdivision can potentially happen in productive rural areas.

Minister David Parker stated publically on Sunday 18 September 2022 that productive rural areas are not to be subdivided.

The majority of properties on and around Palmer Mill Road are between 4 and 20 hectares and most of the properties are used 'exclusively or principally' as farmland and / or commercial land, therefore one could say they are classified as non-urban land of 5 hectares and more, based on the definition in Toitu Te Whenua – Land Information New Zealand.

The Council informed us that land below 10 hectares are not classed productive in the economic sense.

Who decides what productive in an economic sense means?

As pointed out above nearly all of the properties run at least several sheep and cattle on their property. Definitely too many animals to be considered pets or a hobby. As most of the animals are sent to the meat works for processing every landowner contributes to the NZ economy, even if it is just on a small scale. By reducing the size of the land, this contribution will be taken away and the land will be 100% **unproductive**.

According to the Environment NZ, publication from 15 April 2021, not all land is equally productive. Highly productive land has a good climate, suitable soil and is flat or gently sloping. Less irrigation and fertilizer are needed to grow food than in other areas. This describes the area we are living in.

Small scale farming is certainly more environmentally friendly and better for animal welfare than a large operation. Large scale farming is not always economical or successful either.

Based on a publication in the Environment NZ, from 15 April 2021 The Government has set a target for the primary industries to increase export earnings by a further \$44 billion (this number has likely increased by now) in the next decade to support economic recovery after the COVID-19 pandemic. Small scale farming will contribute to this as well.

But productive land that is now **unavailable** for agriculture increased by 54% for 2002-19. Rural residential areas have more than doubled in this time.

3b.3.3 Commercial Activities - People's livelihood

According to Council landowners will not have to change what they are currently doing and the way that they currently live, as current activities all have existing use right.

Rezoning and subdivision have proven to force change to landowners for different reasons. Some current businesses create dust, odour and or noise even if it is within the permissible limits, but it still causes neighbours to be upset and complain (Perma Pine is a perfect example, and the pig farm between Cambridge and Hamilton that was pushed out).

Allowing the number of properties and dwellings to triple and bringing new people into the area will undoubtedly result in more issues and complaints for noise, odour, and dust.

Based on past experiences, increased complaints to Councils will lead to further zoning changes, which can result in not being able to run businesses or farm animals on the land.

Loss of the income and financial hardship could be what quite a few of the current landowners will be facing. Is that what Council really wants?

How will Council deal with those issues and how can Council assure current property owners that this will not result in a zoning change again?

3b.3.4 Fragmentation of land

The publication in the Environment NZ, from 15 April 2021, also talked about fragmentation of highly productive land by subdivision can shift this land out of production. This happens particularly with the development of lifestyle blocks, which were about 5 hectares on average in 2011 (Andrew & Dymond, 2013).

These smaller blocks of land can and do produce meat, vegetables, fruit, and eggs. While a percentage of this produce is consumed by the landholder, surplus is generally directed for commercial consumption. From an animal welfare perspective, small density farming produces a happier healthier less stressed animal resulting in a better-quality product. Often overlooked is the support that they can provide to the larger farming units. Some examples of this are winter feeding/grazing, production of silage, raising calves destined to be reintroduced back into dairy herds upon maturity.

The way fragmentation happens can also increase the demand for further subdivision. If lifestyle blocks and rural subdivisions are scattered across an area, the agricultural land in between is also likely to become fragmented (Curran-Cournane et al., 2016; Hart et al., 2013). Land fragmentation can limit the options for land use today and in the future (Rutledge et al., 2015).

3b.3.6 Impact on Community Infrastructure

Landowners around Palmer Mill Road area are currently self-serving when it comes to Infrastructure.

People's expectations: People moving from urban to lifestyle properties still expect the same service as they had in town such as, rubbish collection, streetlights, food paths and reserve land. None of those services exist in any of the areas suggested for subdivision.

Traffic: Increased car movements per property per day, would certainly not only increase noise, dust, odour and of course additional littering.

We already experience increased traffic on days when venues are held or diversions created. I do not even want to imagine what it would be like with all the additional properties.

Safety of people walking, running, cycling, riding their horses or walking their dogs will be compromised. What would the cost be to the community of Taupo to install all footpaths and streetlights?

Water supply: Most properties in and around Palmer Mill Road receive their water supply from bores (at the depth of the lake) or rainwater.

We would like to see research before approval of the rezoning that there is enough water to supply the increased population, that the suggested subdivision would create, should every household decide to take advantage of this new rezoning. Roof supply in times of extended draught might not be enough.

Part of Council's Due Diligence should be to ensure that ALL infrastructure requirements can be met before allowing rezoning.

Land value: Land value on smaller properties is already higher than on bigger properties, therefore the assumption is that the rates for the smaller sections will be higher, which ultimately will lead to a general higher than usual rate increase for the whole area – an area in which we already receive limited services.

Submission Table

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- Each individual submission point should be on a different row. Use as many rows as you require.
- You can attach additional commentary and documents should you need to.
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 - Plan Change 42 – General Rural and Rural Lifestyle Environments
 - Plan Change 43 – Taupō Industrial Environment Rezoning

Plan Change State which Plan Change that your submission relates (see above)	Specific part/provision State the specific part or provision of proposed Plan Change your submission relates to. If you cannot give a specific number Council Planners will add this for you.	Support? Oppose? Amend? choose one of the above	Relief sought What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?	Reasons Include reason(s) for your submission point
Plan Change 38	Strategic Directions 2.1.2 objective - Tangata Whenua, 1 – 6.	Amend	Amend to include all peoples of Taupo, no matter what their culture. Amend to include a more robust consultative process with all peoples.	<ul style="list-style-type: none"> • Consult widely – ensure democratic process is followed. • Where is the consensus on this? • Imbalance of power away from rate payer/owners. • Every culture has connection to their land. • Kotahitanga and manaakitanga should be reflected for all tangata whenua.
Plan Change 38	Strategic Directions 2.2.3 Policy - Fresh Water Quality - Subdivision of land use is managed in a way that promotes positive effects.	Amend part 4: Delete: "Recognise the benefits of subdivision, land	RMA supports promotion of fresh water quality, but does not remove responsibility for our sustainable use of water. Statement 4 under 2.2.3 Policy is	<ul style="list-style-type: none"> • Farmers already maintain water quality, as this is a requirement to farm healthy stock. • Self-responsibility.

		use and development activities which will directly contribute to the enhancement of fresh water quality. ”	defunct through the fact the RMA 1991 caters for this already.	
Plan Change 38	Strategic Directions - Urban Form and Development & Strategic Infrastructure	Amend	To include a more robust planning process to ensure development of infrastructure is well thought out, to reduce costly errors.	<ul style="list-style-type: none"> • Limited foreplanning evident • Inadequate infrastructure - mistakes are being regularly made, eg. roundabouts too small, ineffective planning and changes implemented at intersections, inadequate sewerage system) infrastructure in town. • Trust in town planning is eroded
Plan Change 38	Strategic Directions - Natural Values & Landscapes	Support	2.6.3 Policy 6: Recognise the contribution made by landowners to the protection and enhancement of areas of natural values and landscapes.	<ul style="list-style-type: none"> • Most property owners enhance their natural environments without any enforcement from local or national government required.. • Local enhancement has already been occurring at a great rate. • Self-responsibility for the environment.
Plan Change 39	Residential Coverage	Support	Increase permitted residential building coverage in most residential environments from 30% to 35%.	<ul style="list-style-type: none"> • Limit the % such as 35% to allow for good space between properties.

Plan Change 40	Taupo Town Centre – changes to building height provisions.	Oppose	Change building height provisions <ul style="list-style-type: none"> Amend current proposal to “Maintain 3 storey maximum limit” 	<ul style="list-style-type: none"> Res 199 its p sust: natu reso Mai mou Red Mai rura
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Plan Change 42	3b.3 Environmental Impact	Amend	Amend <ul style="list-style-type: none"> Change minimum property size to 4 hectares to minimise impact. 	<ul style="list-style-type: none"> Lan Bioc com grea mak havi supr

				<p>urban areas are not.</p> <ul style="list-style-type: none">• Water quality• Infrastructure - The current infrastructure already does not provide current residents with the services and quality of utilities they need, so it is a struggle to imagine that you would manage to support this for many more residents.• Hazards• New boundaries• Restrictions on future land use - "Urbanisation" of farming areas tends to increase restrictive covenants and run the risk of pushing out productive farmers of any size - I would not want to see this happen in our area, where we are mostly productive farms, with a few pockets of communities on smaller sections.• Land use expectations• Reverse sensitivity
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Plan Change 38	Strategic Directions - Natural Values & Landscapes	Support	2.6.3 Policy 6: Recognise the contribution made by landowners to the protection and enhancement of areas of natural values and landscapes.	<ul style="list-style-type: none"> • Most property owners enhance their natural environments without any enforcement from local or national government required.. • Local enhancement has already been occurring at a great rate. • Self-responsibility for the environment.
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Plan Change 42	3b.3 Environmental Impact	Amend	Amend <ul style="list-style-type: none"> Change minimum property size to 4 hectares to minimise impact. 	<ul style="list-style-type: none"> Landform Biodiversity - In our rural community our farmers are great at pasture management, making improvements and having sustainable systems to support the environment - urban areas are not. Water quality

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First name: Richard
Last name: Thompson
Postal address: 58 Palmer Mill Road
Suburb: Wairakei
City: Taupo
Country: New Zealand
Postcode: 3384
Email: tomodebs@yahoo.co.nz

Daytime Phone: 0273218282

- I could
 I could not

Gain an advantage in trade competition through this submission

- I am
 I 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 the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

File
Richard ThompsonTJ57NK-DownloadableForm5SubmissionforPlanChange
Richard Thompson Submission to Taupo Council

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Submission to Taupo District Council regarding Rezoning

Overarching Statement

I am against rezoning from Rural to Rural -Lifestyle because it will have impact on:

- the character of the **current** Rural living
- current residents, as it will create issues and discontent amongst neighbours
- possibly forces landowners to close their businesses and creates financial hardship
- it will have a negative impact on the landscape and the environment of those areas
- increase of rates due to rezoning .

3b.1 Demand for Rural Properties

Palmer Mill Road Demand

According to Council there is increased demand for rural lifestyle living.

The evidence indicates that the opposite may be true. Many residents have confirmed and expressed their concerns and opposition to Councils rezoning proposal .

There have been 2 properties on the market on and around Palmer Mill Road recently, each of them for longer than 2 months. If the demand for rural properties is as high as Council predicts, one would have thought that those properties would have been sold quickly, as they have done in the last couple of years.

Proximity to Taupo town

The general understanding of a lifestyle property is that they are a buffer zone between rural and urban areas which is not the case for most of the suggested areas. This is certainly not the case for Palmer Mill Road.

Palmer Mill Road is 15 kilometers from Taupo with just Wairakei Village and farmland in between. A dispersed pattern of growth means higher transport costs (economic and environmental) and reduces the choices for suitable transport options.

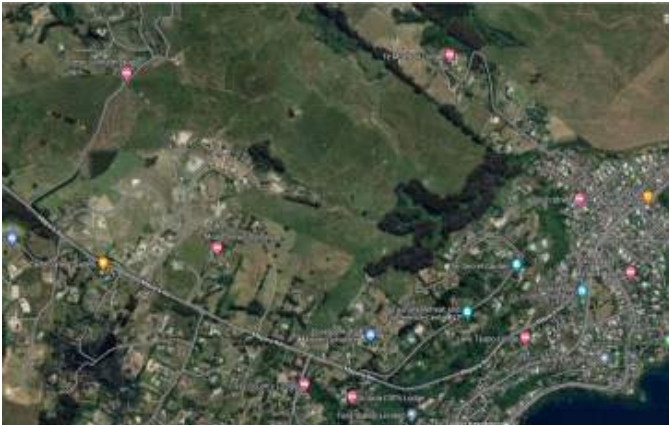
There is no public transport from Palmer Mill Road into town.

Why does Council not consider land boarding on to town for rezoning? We would like to suggest that other areas for further development exist, such as

- both sides of Centennial Drive
- area between Nukuhau and Acacia Bay



- area between Marpara Road Urban neighbourhood and Hill View Drive
- this area already consists of smaller lifestyle blocks, it is in close proximity to town, so it would make sense to extend this further



- area between Lake Terrace, Richmond Ave and SH1



- western side of the lake

According to Statistics New Zealand and Taupo District Plan 2050, there might be a growth until 2030 but after that a more likely decline to the aging population, less births, etc. Therefore, rezoning areas and all the changes and expenses that go with it, seems to be a waste of money, which surely could be invested better in other projects.

3b.3 Environmental Impact

In and around Palmer Mill Road the proposed rezoning will allow the subdivision from around 45 to 150 properties. Adding a minor dwelling to all these properties, would triple the number of houses.

The environmental impact on the area would be great. The possible housing density would destroy rural living and would have a significant impact on the environment resources and certainly have a detrimental aesthetic effect as well.

Most of the properties around this area are between 4 and 20 hectares (plus many huge farms, particularly on the Northern side of the road); why destroy the landscape and put extra pressure on the land. We suggest amending the rezoning to a minimum property size of 4 hectares to minimise the environmental effect, but allowing minor dwellings.

If a minimum size of 4 hectares is not achievable, it is important that the effects of the likely land use change are addressed before change of zoning.

Potential adverse effects on additional buildings are included (see table below). If these issues do not arise initially, most of these points will become an issue in the future.

Effect	Detail
Landform	Earthworks associated with the construction of building platforms, the provision of infrastructure including roads, loss of productive soils, and loss of natural landscape character.
Biodiversity	Vegetation clearance and associated effects on fauna.
Water quality	Vegetation clearance, release of silt and contaminant loadings, stormwater runoff, on-site effluent treatment and disposal systems. But in rural areas, the smaller population size means that services such as water and sewerage treatment plants are less cost-effective.
Infrastructure	Increased demand on stormwater, sewerage, roading, energy, and water supply.
Hazards	The creation of additional allotments within an area susceptible to natural hazards. Environmental hazards that are more likely in rural areas include: <ul style="list-style-type: none"> • untreated drinking-water, which increases the risk of water-borne diseases • contact with livestock, which can carry zoonotic diseases and pollute waterways

Effect	Detail
	<ul style="list-style-type: none"> • lack of tertiary wastewater treatment to kill pathogens in human sewage, which can lead to freshwater and coastal beaches being unsuitable for swimming • lack of reticulated sewerage systems, which can have local environmental impacts (for example, if septic tanks overflow) • longer travel distances to access health services, which can be a barrier to health care.
New boundaries	The height of buildings in relation to boundaries, vehicular access, parking spaces, the provision of public and private infrastructures and the physical changes associated with increased density.
Social and economic	The use of land for different purposes can cause increased demand for infrastructure, community facilities, public and private transport, and a change in amenity values or social coherence.
Restrictions on future land use	Consent notices, covenants and encumbrances on the new allotments (often intended to mitigate adverse environmental effects flowing from subdivision) may dictate the type or nature of any future development.
Land use expectations	Rezoning creates an expectation that subsequent occupation and development will be permitted.
Reverse sensitivity	For example, the establishment of residential settlements sensitive to certain rural activities (such as dust and noise) within an area previously entirely rural.

3b.3.1 Maintain the Character of the Rural Lifestyle

The character of the **current** environment will not be maintained, if property sizes will be reduced, and additional housing will be erected (as pointed out above a potential increase from 45 to 150 properties and three times as many houses).

The impact to the area would be devastating. We would go from a quiet rural neighbourhood to a “Lifestyle” Wharewaka. The land will be more fragmented and less productive and littered with buildings. Council stated in its original letter that ‘buildings are to be separated from each other and not supposed to be dominating the landscape.’ The potential increase in houses would certainly contradict this statement

Traffic within the area will increase. Increased traffic will put increased strain on the environment and will have an impact on safety around the area. More is outlined in the points below.

3b.3.3 Productivity of the land

Initially Council stated in its initial letter, that no subdivision will happen in productive rural areas, it later said that subdivision can potentially happen in productive rural areas.

Minister David Parker stated publically on Sunday 18 September 2022 that productive rural areas are not to be subdivided.

The majority of properties on and around Palmer Mill Road are between 4 and 20 hectares and most of the properties are used 'exclusively or principally' as farmland and / or commercial land, therefore one could say they are classified as non-urban land of 5 hectares and more, based on the definition in Toitu Te Whenua – Land Information New Zealand.

The Council informed us that land below 10 hectares are not classed productive in the economic sense.

Who decides what productive in an economic sense means?

As pointed out above nearly all of the properties run at least several sheep and cattle on their property. Definitely too many animals to be considered pets or a hobby. As most of the animals are sent to the meat works for processing every landowner contributes to the NZ economy, even if it is just on a small scale. By reducing the size of the land, this contribution will be taken away and the land will be 100% **unproductive**.

According to the Environment NZ, publication from 15 April 2021, not all land is equally productive. Highly productive land has a good climate, suitable soil and is flat or gently sloping. Less irrigation and fertilizer are needed to grow food than in other areas. This describes the area we are living in.

Small scale farming is certainly more environmentally friendly and better for animal welfare than a large operation. Large scale farming is not always economical or successful either.

Based on a publication in the Environment NZ, from 15 April 2021 The Government has set a target for the primary industries to increase export earnings by a further \$44 billion (this number has likely increased by now) in the next decade to support economic recovery after the COVID-19 pandemic. Small scale farming will contribute to this as well.

But productive land that is now **unavailable** for agriculture increased by 54% for 2002-19. Rural residential areas have more than doubled in this time.

3b.3.3 Commercial Activities - People's livelihood

According to Council landowners will not have to change what they are currently doing and the way that they currently live, as current activities all have existing use right.

Rezoning and subdivision have proven to force change to landowners for different reasons. Some current businesses create dust, odour and or noise even if it is within the permissible limits, but it still causes neighbours to be upset and complain (Perma Pine is a perfect example, and the pig farm between Cambridge and Hamilton that was pushed out).

Allowing the number of properties and dwellings to triple and bringing new people into the area will undoubtedly result in more issues and complaints for noise, odour, and dust.

Based on past experiences, increased complaints to Councils will lead to further zoning changes, which can result in not being able to run businesses or farm animals on the land.

Loss of the income and financial hardship could be what quite a few of the current landowners will be facing. Is that what Council really wants?

How will Council deal with those issues and how can Council assure current property owners that this will not result in a zoning change again?

3b.3.4 Fragmentation of land

The publication in the Environment NZ, from 15 April 2021, also talked about fragmentation of highly productive land by subdivision can shift this land out of production. This happens particularly with the development of lifestyle blocks, which were about 5 hectares on average in 2011 (Andrew & Dymond, 2013).

These smaller blocks of land can and do produce meat, vegetables, fruit, and eggs. While a percentage of this produce is consumed by the landholder, surplus is generally directed for commercial consumption. From an animal welfare perspective, small density farming produces a happier healthier less stressed animal resulting in a better-quality product. Often overlooked is the support that they can provide to the larger farming units. Some examples of this are winter feeding/grazing, production of silage, raising calves destined to be reintroduced back into dairy herds upon maturity.

The way fragmentation happens can also increase the demand for further subdivision. If lifestyle blocks and rural subdivisions are scattered across an area, the agricultural land in between is also likely to become fragmented (Curran-Cournane et al., 2016; Hart et al., 2013). Land fragmentation can limit the options for land use today and in the future (Rutledge et al., 2015).

3b.3.6 Impact on Community Infrastructure

Landowners around Palmer Mill Road area are currently self-serving when it comes to Infrastructure.

People's expectations: People moving from urban to lifestyle properties still expect the same service as they had in town such as, rubbish collection, streetlights, food paths and reserve land. None of those services exist in any of the areas suggested for subdivision.

Traffic: Increased car movements per property per day, would certainly not only increase noise, dust, odour and of course additional littering.

We already experience increased traffic on days when venues are held or diversions created. I do not even want to imagine what it would be like with all the additional properties.

Safety of people walking, running, cycling, riding their horses or walking their dogs will be compromised. What would the cost be to the community of Taupo to install all footpaths and streetlights?

Water supply: Most properties in and around Palmer Mill Road receive their water supply from bores (at the depth of the lake) or rainwater.

We would like to see research before approval of the rezoning that there is enough water to supply the increased population, that the suggested subdivision would create, should every household decide to take advantage of this new rezoning. Roof supply in times of extended draught might not be enough.

Part of Council's Due Diligence should be to ensure that ALL infrastructure requirements can be met before allowing rezoning.

Land value: Land value on smaller properties is already higher than on bigger properties, therefore the assumption is that the rates for the smaller sections will be higher, which ultimately will lead to a general higher than usual rate increase for the whole area – an area in which we already receive limited services.

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		activities which will directly contribute to the enhancement of fresh water quality.”		
Plan Change 38	Strategic Directions - Urban Form and Development & Strategic Infrastructure	Amend	To include a more robust planning process to ensure development of infrastructure is well thought out, to reduce costly errors.	<ul style="list-style-type: none"> • Limited foreplanning evident • Inadequate infrastructure - mistakes are being regularly made, eg. roundabouts too small, ineffective planning and changes implemented at intersections, inadequate sewerage system) infrastructure in town. • Trust in town planning is eroded
Plan Change 38	Strategic Directions - Natural Values & Landscapes	Support	2.6.3 Policy 6: Recognise the contribution made by landowners to the protection and enhancement of areas of natural values and landscapes.	<ul style="list-style-type: none"> • Most property owners enhance their natural environments without any enforcement from local or national government required.. • Local enhancement has already been occurring at a great rate. • Self-responsibility for the environment.
Plan Change 39	Residential Coverage	Support	Increase permitted residential building coverage in most residential environments from 30% to 35%.	<ul style="list-style-type: none"> • Limit the % such as 35% to allow for good space between properties.

Plan Change 40	Taupo Town Centre – changes to building height provisions.	Oppose	Change building height provisions <ul style="list-style-type: none"> Amend current proposal to “Maintain 3 storey maximum limit” 	<ul style="list-style-type: none"> Resource Management Act 1991 (RMA 1991) Part 2 has its purpose as “...to promote sustainable management of natural and physical resources.” Maintain unique lake and mountain vistas. Reduce shadow casting. Maintain the aesthetics of our rural town environment.
Plan Change 42	3b Rural Environment Chapter 3b.1 Demand for rural lifestyle living in specific locations Please see attached supporting documents, evidence and personal information relating to this submission, particularly for Plan Change 42.	Oppose	Delete Palmer Mill Road from The Rural Lifestyle Environment and add back to the General Rural environment. <ul style="list-style-type: none"> Choose areas closer to town for rural lifestyle environment to avoid fragmentation and risk of increasing the quantity of unproductive land. 	<ul style="list-style-type: none"> Reduction to less than 4ha can make land unproductive Is there really demand? Population growth is not continuing as per Department of Statistics. Too far out of town. Can Council provide actual figures supporting the statement? Resource
Plan Change 42	3b.3 Environmental Impact	Amend	Amend <ul style="list-style-type: none"> Change minimum property size to 4 hectares to minimise impact. 	<ul style="list-style-type: none"> Landform Biodiversity - In our rural community our farmers are great at pasture management, making improvements and having sustainable systems to support the environment - urban areas are not. Water quality

				<ul style="list-style-type: none">• Infrastructure - The current infrastructure already does not provide current residents with the services and quality of utilities they need, so it is a struggle to imagine that you would manage to support this for many more residents.• Hazards• New boundaries• Restrictions on future land use - "Urbanisation" of farming areas tends to increase restrictive covenants and run the risk of pushing out productive farmers of any size - I would not want to see this happen in our area, where we are mostly productive farms, with a few pockets of communities on smaller sections.• Land use expectations• Reverse sensitivity
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Plan Change 42	3b.3.1 Maintaining the Character of Rural Lifestyle Environment	Oppose	Delete as it will change the character of the area.	<p>Productivity of the land - The rates and other costs of subdividing our own assets, are prohibitive and tend to line the TDC pockets more than the owner – this makes subdivision uneconomical as an option.</p> <ul style="list-style-type: none"> • Commercial Activities – adversely affect and change the lifestyle of the farming community. <p>Fragmentation of land – peaceful occupation becomes a tenuous idea. There would be a reduction in the peacefulness and health of our community, due to environmental effects of more dwellings and traffic.</p>
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Plan Change 42	3b.3.3 Productivity of Land Commercial activities – People’s Livelihood	Oppose	Delete as land productivity will be lost	<ul style="list-style-type: none"> • Land productivity will be lost • Potential closing of business • This will further increase land restrictions and the application of restrictive covenants, thereby running the risk of pushing out productive farmers of any size - I would not want to see this happen in our area, where we are mostly productive farms, with a few pockets of communities on smaller sections.
Plan Change 42	3b.3.6 Impact on Community Infrastructure	Oppose	There is no community infrastructure currently – every property is self-serving.	<ul style="list-style-type: none"> • No infrastructure to support all those possible smaller properties. • Rate increase <p>Increased traffic flow - There would be an increase in traffic flow, making things less safe for our families and animals.</p> <p>Subdivision is supported as an idea, however, the very small size proposed should be closer to town than the current proposal.</p>



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- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I 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 the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision: Plan Change 39 - Building Coverage - Residential Environment

Points: 79.1

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Retain

Include reason(s) for your submission point

We support this change to building coverage as it brings TDC in line with other similar sized Councils and provides for additional housing within our Residential Environment.

We do note that page 5 of the S32 references no change in Permeable surfaces relating to stormwater as a result of no change in the Total coverage rule. We only note in brief that the Total Coverage rule as it is worded does not in fact manage the amount of impermeability on each site. If this is what is intended this matter requires addressing in a future Residential Plan Change.

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.1 Performance Standards > 4g.1.10 Taupō Town Centre Environment Height Overlay **Points: 79.2**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Combine Rules 4g.1.9 and 4g.1.10 as follows

g.1.9 Maximum Building Height

The maximum height of any building shall be as follows:

- i. Total Maximum height of three (3) floors above ground level, except where provided by (ii) below:
- ii. The maximum height of any building shall be in accordance with the Taupō Town Centre Environment Height Overlays in the planning maps.

4g.1.10 Taupō Town Centre Environment

Environment

Height Overlay

- ~~i. Any building, or part of any building, located within the Taupō Town Centre Environment Height Overlays in the planning maps that exceeds a total height of (3) floors above ground level.~~
- iii. Any application arising from this rule shall not be limited or publicly notified

Include reason(s) for your submission point

Part i of this rule doesn't say anything. In conjunction with Rule 4g.1.9 is this saying that the height limit is now 3 storeys up to 16m. Why does it matter how many storeys if there is a 16m or 12m height limit.

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.1 Performance Standards > 4g.1.12 Verandas **Points: 79.3**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Support

Include reason(s) for your submission point

Removing rules for verandahs on service lanes makes sense.

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.1 Performance Standards > 4g.1.16 Verandas **Points: 79.4**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Support

Include reason(s) for your submission point

Removing rules for verandahs on service lanes makes sense.

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.2 Land Use Rules **Points: 79.5**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Support

Consider the linkage to noise, odour and loading/parking for the extended period now proposed.

Include reason(s) for your submission point

This change provides more flexibility for temporary activities, although this does provide for a temporary activity to exceed any performance standard (including noise and odour, loading and access) for a period of 2.5 weeks.

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.4 Assessment Criteria **Points: 79.6**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Seek amendment

Amend

NOTE: These matters are applicable to a breach of Rule ~~4g.1.10~~ 4g.1.9

Include reason(s) for your submission point

The assessment criteria are suitable. in light of submission point on Rules 4g.1.9 & 4g.1.10 a slight amendment is proposed

Provision: Plan Change 41 - Removal of Fault lines > Plan Change Provisions **Points: 79.7**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Seek amendment

Include reason(s) for your submission point

No fault line rules in the District Plan means that if owners are building a building which doesn't need resource consent, the identification of fault lines and setbacks is potentially only identified at PIM stage or via the Waikato hazard portal. This could be quite late in the process for this matter to be identified. If not in the District Plan, Council must be diligent in providing this information in LIMs and in PIMs, and on enquiry.

We do question if the new fault lines in the district plan or not? Mapi has them listed as a layer but not in the district plan layers. Similarly we note that the Flood hazard layer sits outside of the District Plan layers in Mapi however they are noted in Section 4e as being in the District Plan. Clarity is needed on how these hazard layers are addressed/labeled on Mapi with regard to District Plan maps.

Provision: Plan Change 43 - Taupō Industrial Zone > 4h Taupō Industrial Environment and Centennial Industrial Environment

Points: 79.8

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Ensure that the future interface of Map 2 industrial zone with Residential zone, and the amenity of the Eastern gateway to Taupo is considered at the time of subdivision in particular if a controlled activity subdivision is proposed.

Identifying the land as Sensitive with specific assessment criteria could address this. Or the addition of assessment criteria in 4h.4.12.

Include reason(s) for your submission point

The provision of additional industrially zoned land is excellent to support industrial growth. Map 2 provides for an area of Industrial land in close proximity to Residential zoned land. Neither the subdivisions rules or the assessment criteria address this. There are provisions relating to avoiding non-industrial activities within the Industrial Zone and existing policy 3t.2.6 requires consideration of this matter. Careful consideration is required to ensure that this policy is sufficient for this location and is reflected in a controlled activity subdivision.

Additionally we note that this location is on a main gateway to the town. Again policy 3t.2.3 addresses this however the key rules addressing this matter are the setback rule 4h.1.3 and 4h.1.4 to be implemented at the time of building construction. There is no linkage to this matter in subdivision, in particular a controlled activity subdivision.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > Planning Maps **Points: 79.9**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Clarification of the area in Kinloch shown as proposed Rural Lifestyle as it relates to Rule 4a.4.4 and proposed minor dwelling rule is required

Include reason(s) for your submission point

An area in Kinloch Structure plan is included as rural lifestyle. Currently a 2nd dwelling requires consent, yet rural lifestyle allows minor dwelling. this appears to be a contradiction in rules.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > Amendments to the Definitions of the Taupō District Plan Section 10

Points: 79.10

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Buildings for the management of farmed animals - includes, but is not limited to, buildings used for accommodating livestock or farmed animals, either overnight or for a period during the day, and includes cow milking sheds, calf sheds, buildings used to house intensive farming activities, poultry farming buildings, feed pads, animal boarding facilities and stables. Buildings housing animals do not include a residential unit accommodating household pets such as cats and dogs and do not include buildings less than 100m².

Include reason(s) for your submission point

For Buildings for the Management of Farm Animals, an exemption for small buildings could be provided to provide for small scale buildings.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > Amendments to the Definitions of the Taupō District Plan Section 10

Points: 79.11

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Rural Industry - an activity that directly supports, services, or is dependent on primary production and has a locational-functional or operational need to be within the General Rural Environment (rather than an urban environment). These activities include, but are not limited to; forestry, agriculture, dairy farming and geothermal/electricity generation, rural contractors, equestrian activities, horticulture, home kill, forestry processors, lawfully established industry, and the sale of rural produce on the site of production.

Include reason(s) for your submission point

Rural Industry definition should also include rural contractors, equestrian, horticulture, home kill, forestry processors, except lawfully established industry, and the sale of rural produce on the site of production (to avoid confusion with the Commercial Activity rule).

Expanding the definition of Rural Industry for greater clarity in particular regarding the retailing of primary produce at the location of production will further enable Rural Industry to function within the General Rural zone.

We also note that 'Locational Need' is not defined, not in the District Plan and not in law. Functional need or

Operational Need is defined in law and in National Planning Standards. We query what locational need is and suggest that functional or operational need would be better.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies

Points: 79.12

What decision are you seeking from the Council? What action would you like: Retain?

Delete? Amend?

Seek amendment

Amend to link policies to specific objectives, similar structure to current plan. Include broader assessment criteria for each rule.

Include reason(s) for your submission point

We seek a change in formatting of the O&Ps, a clear linkage policies to specific objectives provides greater clarity in policy framework which is the policy structure in the rest of the District Plan. Additionally we note the removal of assessment criteria. We value Assessment criteria not as a limit to the issues to be considered but a finer direction of the issues. Where Restricted Discretionary activities are proposed, Assessment criteria are of course most necessary.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Objective 3b.2.3 Rural industry

Points: 79.13

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Seek amendment

Amend

Rural industry is enabled whilst general commercial and industrial activities not having a locational functional or operational need to be within the General Rural Environment, other than home-business, are avoided.

Delete rules that limit vehicle movements for rural industry, delete rules that restrict indoor primary production and delete rules that restrict commercial activities and alter or delete rules that restrict sale of primary produce.

Include reason(s) for your submission point

expanding the definition of Rural Industry for greater clarity in particular regarding the retailing of primary produce at the location of production will further enable Rural Industry to function within the General Rural zone. We note that 'Locational Need' is not defined, not in the District Plan and not in law. Functional need or Operational Need is defined in law and in National Planning Standards. We query what locational need is and suggest that functional or operational need would be better.

We do question how rural industry is enabled through the inclusion of rules that restrict indoor primary production and restrict commercial activities and restrict sale of primary produce.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Objective 3b.2.4 Other activities

Points: 79.14

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Seek amendment

Delete Rule 4b.2.8

Include reason(s) for your submission point

We support this policy however question how is visitor accommodation and tourism activities enabled by the proposed rule restricting commercial activity?

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Objective 3b.2.6 Impacts on infrastructure **Points: 79.15**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Seek amendment

The impacts on road infrastructure arising from subdivision and development are managed through the consent process.

Include reason(s) for your submission point

what does are managed mean? How are the impacts to be managed? And managed by who? Addressed by an applicant or Council via rates and Development contributions? and what about managing the permitted activity impacts? Greater clarity is needed in this objective. We also note that only a policy relating to vehicle movements is proposed but not other infrastructure so is it in fact roading infrastructure that is the key issue?

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Objective 3b.2.7 Papakāinga **Points: 79.16**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Support

Include reason(s) for your submission point

Greater provision for papakainga to provide whanau the ability to live on their whenua is supported.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.9 Maintaining the established character **Points: 79.17**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Seek amendment

Maintain the established General Rural Environment character, as defined by:

1. Large open spaces between built structures
2. A mix of residential and rural industry buildings
3. Noises related to production activities during the day but low levels of noise at night
4. Low levels of light spill.
5. Infrequent variable (weekly and seasonally) vehicle movements to and from a site
6. Limited signage that directly relates to the activity operating on the site.

Include reason(s) for your submission point

We note, as does the District Plan that the Rural environment is one with significant industry and activity within it. In locations there is not infrequent vehicle movements, in some locations there are high site specific vehicle movements such as glasshouses, quarries, milk factories etc. And where roads are upgraded sufficiently this is appropriate. We consider that maintaining the established rural character does not mean restricting vehicle movement and economic development for rural industry. We note that arterial routes have

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.11 Heavy vehicle movements **Points: 79.18**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Amend through the addition of assessment criteria for this rule

Include reason(s) for your submission point

To address perceived impacts from traffic on rural roads, this new policy and associated rule is proposed of 200evm/day. There is little evidence provided in the plan change s32 assessment which illustrates the impact of heavy vehicles on rural roads. The rule itself covers all vehicle movements not just heavy vehicle movements however the policy (Policy 3b.2.11) mentions only heavy vehicles.

At a permitted level, this is an unnecessary and bureaucratic restriction on operations, and requires assessment at a PIM on each building consent for rural industries. Many businesses do not track their vehicle movements to any degree and therefore the assessments may be flawed. Where operations are large as triggered by large buildings (thus requiring consent), consideration of this matter can be addressed in a resource consent as they currently are.

Greater clarity on where mitigation is to occur is also needed.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.1 Vehicle movements **Points: 79.19**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Oppose

Delete

or

Amend infringement of this rule to a Restricted Discretionary Activity to be clear what the key issue is and what mitigation is expected.

Include reason(s) for your submission point

To address perceived impacts from traffic on rural roads, this new rule and associated policy is proposed of 200evm/day. There is little evidence provided in the plan change s32 assessment which illustrates the impact of

heavy vehicles on rural roads. The rule itself covers all vehicle movements not just heavy vehicle movements however the policy (Policy 3b.2.11) mentions only heavy vehicles.

At a permitted level and when considering the policy framework of enabling Rural Industry, this is an unnecessary and bureaucratic restriction on operations, and requires assessment at a PIM on each building consent for rural industries. Many businesses do not track their vehicle movements to any degree and therefore the assessments may be flawed. Where operations are large as triggered by large buildings (thus requiring consent), consideration of this matter can be addressed in a resource consent as they currently are.

Greater clarity on where mitigation is to occur is also needed. If there is a concern regarding the roading network, where are the key concerns and how are these to be addressed in consent applications? Consideration of access crossing and visibility at those access crossings do not appear to be the main concern on damage to the transport network broadly.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.12
Minor residential unit **Points: 79.20**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

This enables additional housing for the elderly or rangatahi or young families with less restriction that currently

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.7 Minor residential units **Points: 79.21**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend

Is this rule A maximum of one minor residential unit per primary residential unit per allotment? Or

A maximum of one minor residential unit per primary residential unit permitted by Rule 4b.2.4 ~~per allotment~~..

Include reason(s) for your submission point

This enables additional housing for the elderly or rangatahi or young families with less restriction that currently.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.14
Commercial and industrial activity **Points: 79.22**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Oppose

delete

Include reason(s) for your submission point

Be clear whether Rural Industry can undertake commercial activities ie sale of produce at the farm gate?

However we have seen little evidence to outline how much of a problem commercial activity in rural zone is? The policy and associated rule creates bureaucracy and problems with defining each activity. We note that these small rural retail activities provide a role in supporting rural communities by being gathering places for social connection, and provide alternative employment in rural areas. Such retail or commercial activities can play a role in reducing vehicle trips and emissions and maintain a sense of community. The number of them are small and will likely continue to be small due to the small population supporting them. Unnecessary restriction on commercial operations limits the rural community from a range of business opportunities and fail to provide for rural communities needs.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.17 Papakāinga

Points: 79.23

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

provides for additional housing for Maori

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.2 Objectives and Policies - General Rural Environment > Policy 3b.2.17 Maori Cultural Activities

Points: 79.24

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

We support the continuation of maori cultural activities as being provided for the General Rural environment.

Clarification is required for Clause ii relates to all land management and uses.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Objective 3b.3.1 Maintain the character of the Rural Lifestyle Environment

Points: 79.25

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend

~~The character of the Rural Lifestyle Environment is maintained and protected from incremental subdivision and development.~~

The development of the Rural Lifestyle Environment shall provide for low intensity rural activities and rural amenity associated with low intensity farming

Include reason(s) for your submission point

Given the level of change to occur through the new areas of Rural Lifestyle zone, the character of this area can't be maintained when rules allow significant subdivision... how will the proposed subdivision occur? The development of the Rural Lifestyle Environment shall provide for low intensity rural activities and rural amenity

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Objective 3b.3.2
Avoid reverse sensitivity **Points: 79.26**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Seek amendment

Amend

~~Adverse reverse sensitivity effects, including conflict with permitted and legally established activities in neighbouring Environments, are avoided.~~

The Development of the Rural Lifestyle Environment shall avoid Adverse reverse sensitivity effects, including conflict with permitted and legally established activities in neighbouring Environments

Include reason(s) for your submission point

We consider it important that the policy frameworks reflects the changing nature of this new zone.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Objective 3b.3.3
Commercial and industrial activities **Points: 79.27**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?

Seek amendment

Include reason(s) for your submission point

Clarity is needed here for Rural industry associated commercial activities

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Objective 3b.3.5
Allotment sizes **Points: 79.28**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Seek amendment

Amend

That allotments are ~~developed~~ maintained at sizes to:

1. Enable small scale primary production to occur; and
2. Avoid the cumulative impacts on community infrastructure and services arising from an increase in demand or increases to level of service.

Include reason(s) for your submission point

This objective needs to reflect the changing nature of this zone. This Objective currently reflects a future state not the change that will occur through the new Rural Lifestyle subdivision provisions

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Objective 3b.3.6 Impacts on community infrastructure **Points: 79.29**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Seek amendment

The impacts on community infrastructure arising from subdivision and development are managed through subdivision consents conditions and development contributions.

Include reason(s) for your submission point

Are managed how?

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Policy 3b.3.9 Character of the Rural Lifestyle Environment **Points: 79.30**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Seek amendment

Manage the anticipated character of the Rural Lifestyle Environment as defined by:

1. Buildings on different sites are separated from each other in a way that creates a sense of privacy.
2. Accessory buildings that do not dominate the landscape.
3. Dwellings may be large but are surrounded by open space and do not dominate the landscape.
4. A general absence of urban infrastructure including community stormwater and wastewater services.
5. An environment which includes residential activities, rural productive activities and home business activities.
6. Noise related to production activities during the day but low levels of noise at night.
7. Low levels of light spill.
8. Limited signage that directly relates to the activity operating on the site.
9. The provision of minor units associated with primary dwellings

Include reason(s) for your submission point

This policy should also reflect the provision of minor units

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.3 Objectives and Policies - Rural Lifestyle Environment > Policy 3b.3.14 Māori Cultural Activities

Points: 79.31

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Support

Include reason(s) for your submission point

Clarity is needed with regard to Clause ii as to its the application of it to all land management and all land uses.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.5 Commercial and industrial activities, and home businesses,

Points: 79.32

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Oppose

delete

OR

Make Rule 4b.1.5 and 4b.3.3 consistent in their assessment criteria.

Include reason(s) for your submission point

Be clear whether Rural Industry can undertake commercial activities ie sale of produce at the farm gate?

However we have seen little evidence to outline how much of a problem commercial activity in rural zone is? The policy and associated rule creates bureaucracy and problems with defining each activity. We note that these small rural retail activities provide a role in supporting rural communities by being gathering places for social connection, and provide alternative employment in rural areas. Such retail or commercial activities can play a role in reducing vehicle trips and emissions and maintain a sense of community. The number of them are small and will likely continue to be small due to the small population supporting them. Unnecessary restriction on commercial operations limits the rural community from a range of business opportunities and fail to provide for rural communities needs.

If the rule is to remain we note that the assessment criteria are different bwtm Gen Rural and Rural Lifestyle for commercial activities.

This rule also covers commercial and industrial and home business however Rule 4b.2.2 covers commercial homes business and retail.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.3 General Rules - Rural Lifestyle Environment > 4b.3.3 Home business, commercial,

and retail activities

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Delete or

amend

4b.3.3 Home business, commercial, and ~~retail~~ industrial activities

1. A home business, commercial and retail activity which complies with performance standards is a permitted activity.
2. A home business, commercial and retail activity which does not comply with performance standards is a restricted discretionary activity.

When considering activities under Rule 4b.3.3 Council restricts the exercise of its discretion to the following matters:

1. The effect of the activity on the Rural Lifestyle Environment character, having regard to visual effects and lighting effects.
2. The effects of the activity's vehicle movements, parking, loading and access on the network.
3. Any nuisance effects such as odour, noise and glare are managed within the site.
4. The effect of the activity on surrounding land uses and how these effects can be managed onsite and/or mitigated.
5. The hours of operation for the activity.
6. The proposed signage associated with the activity.

Include reason(s) for your submission point

We submit that there is little evidence provided that this is a significant effect on the rural zone and that the rule is not necessary.

These small rural retail activities provide a role in supporting rural communities by being gathering places for social connection, and provide alternative employment in rural areas. Such retail or commercial activities can play a role in reducing vehicle trips and emissions and maintain a sense of community. The number of them are small and will likely continue to be small due to the small population supporting them. Unnecessary restriction on commercial operations limits the rural community from a range of business opportunities and fail to provide for rural communities needs. Additionally it is unclear if a Rural Industry wish to sell product from the farm gate, is this a commercial activity subject to these restrictions?.

Further more we do question how visitor accommodation and tourism activities are enabled by this rule restricting commercial activity?

We note that the assessment criteria are different bwtm Gen Rural and Rural Lifestyle for commercial activities.

Also Rule 4b.1.5 covers commercial and industrial and home business however this rule covers commercial homes business and retail. Is industrial not included? Is retail not a subset of commercial?

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.10 Intensive indoor primary

production and rural industry

Points: 79.34

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

amend

4b.1.10 Intensive indoor primary production and rural industry

1. An intensive indoor primary production or rural industry activity which complies with performance standards 4b.2.1, 4b.2.2, 4b.2.3 and 4b.2.5 and 4b.2.6 is a permitted activity.
2. An intensive indoor primary production or rural industry activity which does not comply with these performance standards is a restricted discretionary activity.

The Council restricts the exercise of its discretion to the following matters:

1. The daily vehicle movements expected to and from the allotment.
2. The effect of the activity on the rural character of the area, having regard to visual effects and lighting effects.
3. The effect of the activity on surrounding land uses and how these effects can be managed onsite and/or mitigated.
4. The hours of operation for the activity.
5. The proposed signage associated with the activity.

~~The Council restricts the exercise of its discretion to the following matters:~~

- ~~1. The effect of the activity on the rural character of the area, having regard to visual effects and lighting effects.~~
- ~~2. The effect of the activity on surrounding land uses and how these effects can be managed onsite and/or mitigated.~~
- ~~3. The hours of operation for the activity.~~
- ~~4. The proposed signage associated with the activity.~~

Include reason(s) for your submission point

We suggest that complies with 4b.2.6 is also provided for else infringement of this rule for Rural Industry will fall to discretionary. Also the assessment criteria is repeated.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.2 Maximum building coverage

Points: 79.35

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Support

Include reason(s) for your submission point

greater provision for rural industry

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.3 Maximum building size

Points: 79.36

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

greater provision for rural industry

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.5 Maximum building height

Points: 79.37

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Support

Include reason(s) for your submission point

greater flexibility for rural industry

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.6 Minimum building setbacks

Points: 79.38

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?
Seek amendment

Amend proposed rule 4b.2.6 with

- (i) 30 metre setback for dwellings and minor residential units and other buildings from the front boundary.
- (ii) 15 metres setback for dwellings, and minor residential units and other buildings from all other boundaries.

And

Amend to include

4b.1.11 Building setback

Infringement of Rule 4b.2.6 is a restricted discretionary activity

-

Include reason(s) for your submission point

The setback rule for other buildings to the front and other boundaries is not clear. Additionally the infringement of this rule on its own should be restricted discretionary.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.6 Minimum building setbacks

Points: 79.39

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Either

a.delete the rule

or

b. provide an exemption for buildings of 100m² in the definition , and provide an exemption such buildings located along side existing buildings

or

c. reduce the distance to 30m from all other boundaries,

or

d. (i) reduce the distance to 30m from all other boundaries adjoining General Rural and
(ii) 50m from boundaries adjoining Rural Lifestyle

Include reason(s) for your submission point

The Rule 4b.2.6(iv) building for management of farmed animals to be setback 200m is unnecessarily restrictive.

This rule will capture kennels, calf sheds, milking sheds, stables. As well as the larger buildings, this rule will capture too many smaller buildings (such as dog kennels for 4+ dogs), stables for 1+ horses. It will also impacts on the ability to provide new buildings alongside existing infrastructure unnecessarily. This rule will increase the cost of providing farm buildings such as milking sheds and calf sheds due to increased distances for roading and power, 200m is a significant distance from the road to reticulate power and provide roading. We agree this can be an issue adjoining an urban setting and perhaps may be appropriate in the Rural Lifestyle zone however is unnecessary in General Rural and will increase paperwork unnecessarily. Little evidence has been provided in the S32 to illustrate that the location of such buildings which are common place with the General Rural area is a difficulty.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.7 Minor residential units

Points: 79.40

What decision are you seeking from the Council? What action would you like: Retain?

Delete? Amend?

Seek amendment

4b.2.7Minor residential units

A maximum of one minor residential unit per primary residential unit per allotment.

1. All minor residential or accommodation activity units shall:

1. Be no larger than 100m² in size (inclusive of garaging).
2. Be located no greater than 20 metres from the primary residential unit.
3. Share an accessway/driveway with the primary residential unit.

Include reason(s) for your submission point

Rule 4b.2.7 and Rule 4b.4.5 should be consistent

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment > 4b.1.2 Minor residential units

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Points: 79.41

Seek amendment

Include reason(s) for your submission point

Assessment criteria should be consistent between Rule 4b.1.2 and Rule 4b.3.2.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.3 General Rules - Rural Lifestyle Environment > 4b.3.2 Minor residential units

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Points: 79.42

Seek amendment

When considering activities under Rule 4b.3.2 Council restricts the exercise of its discretion to the following matters:

1. The extent to which the residential unit and vehicle access point design, siting and external appearance adversely affects rural character and amenity.
2. Site topography and orientation and whether the residential unit(s) and vehicle access point can be more appropriately located to minimise adverse visual amenity effects.
3. Effect on nearby sites, including outlook and privacy.
4. Whether the residential unit and the vehicle access point can be more appropriately located to maintain, enhance or restore indigenous biodiversity values.
5. The ability to mitigate adverse effects through the use of screening, planting, landscaping and alternative design.
6. The proximity between the primary residential unit and the minor residential unit.
7. Proposed methods for the avoidance, remedying or mitigation of potential adverse effects, and the degree to which they would be successful
8. The likelihood of future subdivision which results in the minor residential unit being on a separate allotment to the primary residential unit.

Include reason(s) for your submission point

Assessment criteria should be consistent between Rule 4b.1.2 and Rule 4b.3.2.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.2 Performance Standards - General Rural Environment > 4b.2.8 Commercial and industrial activities, and home businesses **Points: 79.43**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Amendment sought is either to delete this rule or increase the area. Additionally Rural Industry should be exempt from limitation for retail.

Include reason(s) for your submission point

We submit that there is little evidence provided that this is a significant effect on the rural zone and that the rule is not necessary.

These small rural retail activities provide a role in supporting rural communities by being gathering places for social connection, and provide alternative employment in rural areas. Such retail or commercial activities can play a role in reducing vehicle trips and emissions and maintain a sense of community. The number of them are small and will likely continue to be small due to the small population supporting them. Unnecessary restriction on commercial operations limits the rural community from a range of business opportunities and fail to provide for rural communities needs. Additionally it is unclear if a Rural Industry wish to sell product from the farm gate, is this a commercial activity subject to these restrictions?.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.1 General Rules - General Rural Environment **Points: 79.44**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Include reason(s) for your submission point

We seek greater inclusion in the district plan of the exclusion of limited notification on appropriate rules in particular that most Restricted discretionary activities are precluded from limited notification given the limited scope of effects, thus increasing certainty on limited notification for applicants on such rules

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.3 General Rules - Rural Lifestyle Environment > 4b.3.7 High voltage transmission lines

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

amend

4b.3.7 High voltage transmission lines

1. Any building (except network utilities) located within 0 - 12m of a high-voltage transmission line is a restricted discretionary activity.

When considering activities under Rule 4b.1.7 Council restricts the exercise of its discretion to the following matters:

1. The location of the structure in relation to high-voltage transmission line.
2. Any effects on the safe and efficient functioning of the transmission line.

~~The Council restricts the exercise of its discretion to the following matters:~~

- ~~1. The effect of the activity on the rural character of the area, having regard to visual effects and lighting effects.~~
- ~~2. The effect of the activity on surrounding land uses and how these effects can be managed onsite and/or mitigated.~~
- ~~3. The hours of operation for the activity.~~
- ~~4. The proposed signage associated with the activity.~~

Include reason(s) for your submission point

remove the second set of assessment criteria as being unrelated

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.4 Performance Standards - Rural Lifestyle Environment > 4b.4.1 Vehicle movements

Points: 79.46

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Delete? Amend?

Oppose

same relief sought as noted against Rule 4b.2.1

Include reason(s) for your submission point

we oppose for the same reasons as noted against Rule 4b.2.1

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.4 Performance Standards - Rural Lifestyle Environment > 4b.4.2 Maximum building coverage

Points: 79.47

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Amend?

Support

Include reason(s) for your submission point

Greater flexibility for buildings

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.4 Performance Standards - Rural Lifestyle Environment > 4b.4.3 Maximum building size

Points: 79.48

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Support

Include reason(s) for your submission point

Greater flexibility for buildings

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.4 Performance Standards - Rural Lifestyle Environment > 4b.4.4 Maximum density of residential units

Points: 79.49

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

we seek clarification how this relates to Areas x & y

Include reason(s) for your submission point

we seek clarification how this relates to Areas x & y

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.4 Performance Standards - Rural Lifestyle Environment > 4b.4.5 Minor residential units

Points: 79.50

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Support

Rule 4b.2.7 and Rule 4b.4.5 should be consistent

Include reason(s) for your submission point

Rule 4b.2.7 and Rule 4b.4.5 should be consistent

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.4 Performance Standards - Rural Lifestyle Environment > 4b.4.7 Minimum building setbacks

Points: 79.51

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

amend

- (i) 30 metre setback for dwellings and minor residential units and other buildings from the front boundary.
- (ii) 15 metres setback for dwellings, and minor residential units and other buildings from all other boundaries except as restricted by clause iii.

Include reason(s) for your submission point

Clarify rules for other buildings

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.4 Performance Standards - Rural Lifestyle Environment > 4b.4.9 Home business, commercial, and retail activities

Points: 79.52

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Oppose

amendment sought is either to delete this rule or increase the area. Additionally Rural Industry should be exempt from limitation for retail.

This rule also covers commercial and industrial and home business however Rule 4b.2.2 covers commercial homes business and retail.

4b.4.9 Home business, commercial, and industry ~~retail~~ activities

1. Any indoor or outdoor space used for a home business, commercial or ~~retail~~ industry purposes, shall be less than 100m² in gross floor area for indoor activities, or 100m² of land area for outdoor activities.
2. For home businesses the principal operator of the home business must be a permanent resident on the site to which the home business relates.

Include reason(s) for your submission point

We submit that there is little evidence provided that this is a significant effect on the rural zone and that the rule is not necessary.

These small rural retail activities provide a role in supporting rural communities by being gathering places for social connection, and provide alternative employment in rural areas. Such retail or commercial activities can play a role in reducing vehicle trips and emissions and maintain a sense of community. The number of them are small and will likely continue to be small due to the small population supporting them. Unnecessary restriction on commercial operations limits the rural community from a range of business opportunities and fail to provide for rural communities needs. Additionally it is unclear if a Rural Industry wish to sell product from the farm gate, is this a commercial activity subject to these restrictions?.

If the rule is to remain we note that the assessment criteria are different bwtwn Gen Rural and Rural Lifestyle for commercial activities.

This rule also covers commercial and industrial and home business however Rule 4b.2.2 covers commercial homes business and retail. Is retail not commercial and why is industry uses restricted in General Rural but not Rural Lifestyle?

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules

Points: 79.53

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Seek amendment

Include reason(s) for your submission point

Under Rule 4b.5.2 and 4b.5.3 a 1.95ha lot inside the Rural Lifestyle zone will be a Non-complying activity however a 1.95ha lot adjoining the Rural zone would be a discretionary activity – this appears inconsistent and requires amendment.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.2 Subdivision - Rural Lifestyle Environment that adjoins the General Rural Environment **Points: 79.54**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Seek amendment

4b.5.2 Subdivision - Rural Lifestyle Environment that adjoins the General Rural Environment

1. Subdivision resulting in lots that are 4 hectares or larger adjoining the General Rural Environment is a controlled activity.
2. Subdivision resulting in lots that are smaller than 4 hectares adjoining the General Rural Environment is a discretionary non-complying activity.

Include reason(s) for your submission point

Under Rule 4b.5.2 and 4b.5.3 a 1.95ha lot internal to ie inside the Rural Lifestyle zone will be a Non-complying activity however a 1.95ha lot adjoining the Rural zone would be a discretionary activity – this appears inconsistent and requires amendment.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.3 Subdivision - Rural Lifestyle Environment that does not adjoin the General Rural Environment **Points: 79.55**

What decision are you seeking from the Council? What action would you like: Retain? Delete?

Amend?
Seek amendment

amend

Amend as follows

4b.5.3 Subdivision - Rural Lifestyle Environment that does not adjoin the General Rural Environment

1. Subdivision resulting in lots that are 2 hectares or larger that do not adjoin the General Rural Environment is a controlled activity.
2. Subdivision resulting in lots that are smaller than 2 hectares that do not adjoin the General Rural Environment is a non-complying discretionary activity.

For the purposes of Rules 4b.5.1.i, 4b.5.2.i and 4b.5.3.i the matters over which the Council reserves control for the purpose of assessment are:

1. The design and layout of the subdivision to ensure safe and efficient access onto existing and/or proposed roads, multi-modal connectivity if appropriate, suitable building platforms to accommodate future complying buildings, and adequate quatam management of stormwater.
2. The identification of any natural hazards or contaminated sites and how these may affect the stability of

- the land and suitability of any future building sites, including any information provided by a suitably qualified person whose investigations are supplied with the subdivision application.
3. Whether the desired environmental outcome with a consistent and appropriate standard of infrastructure is achieved such as through compliance with the Council's Development Guidelines and Structure Plans.
 4. The extent to which earthworks and vegetation removal is required to create vehicle tracks and building platforms.
 5. Any actual or potential effects on areas or features of cultural, historic, landscape or natural value as identified in the plan.
 6. The imposition of conditions in accordance with Sections 108 and 220 of the Resource Management Act 1991.
 7. Any potential adverse effects from Natural Hazards, including flood inundation or erosion from the District's waterways and Lakes, and fault lines.
 8. Any immediate adverse or potentially adverse effects, including cumulative effects, on the amenity and landscape values of the Rural Environment, and the methods by which such effects can be remedied or mitigated.

Include reason(s) for your submission point

Under Rule 4b.5.2 and 4b.5.3 a 1.95ha lot inside the Rural Lifestyle zone will be a Non-complying activity however a 1.95ha lot adjoining the Rural zone would be a discretionary activity – this appears inconsistent and requires amendment.

there is a lack of clarity regarding the inclusive of fault lines and 'adequate' management of stormwater. Is this adequate with regard to quantum mgmt or quality management? In regard to WRC guidelines yet the rural context this requires clarification.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.5 Subdivision resulting in a new public road, or extension of existing public road **Points: 79.56**

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

4b.5.5 Subdivision resulting in a new public road, or extension of existing public road

1. Any subdivision or activity which results in a new public road or extension of existing public roads, water, stormwater or wastewater utility services is a restricted discretionary activity.

The Council restricts the exercise of its discretion to the following matters:

- a. The impact of the resulting development on the ability of the wastewater, stormwater and drinking water infrastructure to service the existing service area as well as the new development;
- b. The impact of the resulting development on the ability of the roading networks to safely and sustainably operate and service the new development including the need for connectivity to adjoining land and other roads and the facilitation of multimodal transport ;
- c. The effect that the development will have on the stormwater catchment.

Include reason(s) for your submission point

assessment criteria does not address the consideration of connectivity or alternative modes of transport

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.6 Subdivision - Other

Points: 79.57

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

Update Rules in Rule 4b.5.6 to be more consistent with General Rural subdivision rules

Include reason(s) for your submission point

Rules in Areas X& Y are inconsistent with the Gen Rural rules.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.9 Subdivision - More than 12 allotments

Points: 79.58

What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?

Seek amendment

amend to include assessment criteria or provide policy direction similarly.

4b.5.9 Subdivision - More than 12 allotments

Any subdivision of land where more than twelve (12) allotments share a single common access in the General Rural Environment or Rural Lifestyle Environment is a discretionary activity.

Assessment Criteria

1. Adequacy of road legal and formed width

2. Adequacy of legal arrangements for the private road maintenance.

3. the consideration for connectivity or future connectivity

4. the provision of multi modal considerations ie public pedestrian access or public cycleways including easements .

-

Include reason(s) for your submission point

There are no related policies for this rule. Additionally there are no assessment criteria for this rule. Some guidance is needed to confirm key matters of consideration. Granted under this rule in the current district plan, there are many rural subdivisions granted for more than 12 users on a private road where it is now known there is difficulty with the ongoing maintenance and ownership structure of these private roads. There is little/no guidance in the proposed plan regarding adequacy of formation, adequacy of legal arrangements for the private road maintenance, the consideration for connectivity or future connectivity or the provision of multi modal considerations ie public pedestrian access or cycleways. Such guidance would assist Council and Developers alike.

We also note that the Traffic and transport O&Ps provide little direction on this matter also.

Attached Documents

File

No records to display.



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On behalf of:

Retirement Villages Association of New Zealand Incorporated

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I could

I could not

Gain an advantage in trade competition through this submission

I am

I 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 the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

File
RVA_-_Submission_on_Taupo_Plan_Changes_38-39 - December 2022



Form 5

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION

Clause 6 of Schedule 1, Resource Management Act 1991

To Taupō District Council

Name of submitter: Retirement Villages Association of New Zealand Incorporated (RVA)¹

INTRODUCTION

- 1 This is a submission on the Council's proposed amendments to the Taupō District Plan (*District Plan*): Proposed Plan Changes 38-43 (*Proposal*).
- 2 The specific provisions of the Proposal that the RVA's submission relates to are:
 - 2.1 Plan Change 38 – Strategic Directions (*PC38*); and
 - 2.2 Plan Change 39 – Residential Building Coverage (*PC39*).
- 3 RVA could not gain an advantage in trade competition through this submission.
- 4 The RVA welcomes this opportunity to provide feedback on PC38 and PC39. This submission builds on the RVA's submission on the Council's pre-consultation material for the first bundle of plan changes (dated 13 June 2022). The RVA does not intend to repeat all the information set out in its previous submission, but kindly requests the Council to take it into account when considering this submission, in particular the background material outlining the benefits and increasing demand of retirement villages, and the consenting challenges for retirement village providers.

¹ Today, the RVA has 407 member villages throughout New Zealand, with approximately 38,520 units that are home to around 50,000 older New Zealanders. This figure is 96% of the registered retirement village units in New Zealand (there are also almost 6,000 Occupation Right Agreements for care suites as part of the aged care system). The RVA's members include all five publicly-listed companies (Ryman Healthcare, Summerset Group, Arvida Group, Oceania Healthcare, and Radius Residential Care Ltd), other corporate groups (such as Metlifecare and Bupa Healthcare) independent operators, and not-for profit operators (such as community trusts, and religious and welfare organisations).

- 5 The RVA and its members have a significant interest in how the changes to the District Plan will impact on, and support, the provision of retirement villages and aged care in Taupō. The under-provision of this type of accommodation and services in New Zealand, including in Taupō, is at crisis point, with the growing ageing population facing a significant shortage in appropriate accommodation and care options.² Demand for retirement village accommodation is outstripping supply, and demographic changes mean that the demand will continue to grow.
- 6 This critical issue is recognised by the Taupō District Growth Management Strategy 2050 (*TD2050*), which notes housing choice as a “critical” question facing councils in New Zealand and identifies the need to provide for an increasing ageing population.³ Further, the National Policy Statement on Urban Development 2020 (*NPSUD*) directs councils to enable all people to provide for their social, economic and cultural wellbeing, including by enabling a variety of homes to meet the needs of different households. It is therefore important to RVA members that planning regimes for retirement villages are clear and consistent and recognise the significant benefits of retirement villages.
- 7 The RVA welcomes changes made to the Proposal following the consultation on the draft changes earlier this year. However, the RVA considers that some aspects of the Proposal do not adequately provide for the district’s ageing population, in particular the need to provide for adequate retirement and aged care accommodation. Further, some proposed provisions may have more restrictive effects than intended and may act as a barrier to necessary development.
- 8 The RVA considers that the Proposal represents a key opportunity to recognise and address the ageing population as a significant resource management issue for the district. In particular, the RVA seeks that the Strategic Directions explicitly recognise and address the ageing population and their specific housing needs. Doing so would ensure the direction set out in the TD2050 is appropriately reflected in the District Plan, and give effect to the NPSUD.
- 9 As previously submitted to the Council, the RVA has been working and engaging with councils across the country to develop a set of tailored and nationally consistent retirement village provisions. The RVA considers this bespoke planning framework can be adapted for the Taupō context. The RVA and its members are very keen to engage with Council officials on those provisions further, including as you develop the second bundle of plan changes which will include the Residential Chapter. We will be in touch to arrange a meeting.
- 10 This submission is structured as follows:

² As noted in our previous submission, the Government recently recognised the ageing population as one of the key housing and urban development challenges facing New Zealand in its overarching direction for housing and urban development – the Government Policy on Housing and Urban Development (*GPS-HUD*). The GPS-HUD records that “[s]ecure, functional housing choices for older people will be increasingly fundamental to wellbeing”. The government strategy *Better later life – He Oranga Kaumatua 2019 to 2034* recognises that “[m]any people want to age in the communities they already live in, while others wish to move closer to family and whānau, or to move to retirement villages or locations that offer the lifestyle and security they want” (GPS-HUD, page 10).

³ TD2050, page 11.

- 10.1 **Submission on PC38:** this section sets out the RVA’s interest in and key concerns with the Council’s proposal to replace Chapter 2 with a new chapter outlining the strategic directions for the district.
- 10.2 **Submission on PC39:** this section briefly sets out the RVA’s support for the Council’s proposed amendments to increase the residential building coverage.
- 10.3 **Decision sought:** this section sets out the relief sought by the RVA in relation to PC38 and PC39.
- 10.4 **Appendix 1:** sets out the RVA’s specific submission points and relief sought using the table provided by the Council.

SUBMISSION ON PC38 – STRATEGIC DIRECTIONS

- 11 The RVA remains concerned that the high-level strategy direction in the proposed Strategic Directions chapter does not adequately provide for the district’s ageing population, and in particular the critical need to provide adequate retirement and aged care options for this demographic. In its current form, the proposed objectives and policies do not clearly support the provision of a range of housing types, nor intensification to address housing needs. Further, the RVA is concerned that some provisions could result in onerous consent requirements and be a strong deterrence to development.
- 12 The Council’s proposed Chapter 2 outlines the key strategic and significant resource management matters for the district, including objectives and policies to guide decision-making at a strategic level. As set out in the introduction of the proposed chapter, the provisions set out in Chapter 2 are intended to be indicative of the matters which are important to the community and will be particularly relevant for any future changes to the District Plan and resource consent applications.
- 13 Given the strategic importance of the new proposed Chapter 2, the RVA seeks to ensure it adequately provides for, and recognises, the district’s increasing ageing population and the need to provide retirement and aged care accommodation.
- 14 The RVA’s specific concerns with proposed Chapter 2 are set out below.

Strategic Direction Three: Urban Form and Development

- 15 The RVA submitted its concerns with the urban form and development provisions in the pre-consultation phase. The RVA welcomes some changes made to the previous draft provisions, but remains concerned with the failure to adequately recognise the district’s increasing ageing population and their housing needs.
- 16 As acknowledged by the Council, *“Taupō District’s diverse and growing population has led to increased demand for housing”*.⁴ It is therefore imperative for the urban form and development objectives and policies to provide a framework that ensures urban development occurs in an efficient and effective manner while addressing the

⁴ Council Section 32 Assessment, page 43.

critical housing needs of the district, as well as the other key resource management matters for the Taupō district.

Strategic Directions need to provide for the ageing population

- 17 The RVA understands the strategic directions in section 2.3 are intended to establish the approach for urban form and development within the District Plan as identified in TD2050.⁵ TD2050 contains a series of objectives for the district, including the provision for a wide range of housing types to be developed.⁶
- 18 TD2050 specifically recognises that “[h]ousing choice is a critical question facing councils in New Zealand” and “[a]n aging population requires a new way of thinking around how to plan for housing demand, location and type”.⁷ As noted in TD2050, diversity in housing types is essential,⁸ and if done thoughtfully, “intensification can help to provide a diversity in housing types and lifestyles, especially meeting the needs of the increasingly ageing population”.⁹
- 19 Further, as outlined in our previous submission, the District Plan must *give effect* to the NPSUD. The NPSUD specifically recognises that well-functioning urban environments enable all people and communities to provide for their wellbeing, health and safety (Objective 1). Achieving this wellbeing objective in relation to older persons within our community means providing for their specific housing and care needs.
- 20 The NPSUD also states that contributing to well-functioning urban environments means enabling a “*variety of homes*” to meet the “*needs ... of different households*” (Policy 1). The NPSUD therefore requires PC38 to specifically respond to the need to provide suitable and diverse housing choices and options for our ageing population as part of the intensification of urban environments.
- 21 It also requires that “*New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations*” (Objective 4). Further, the NPSUD recognises that amenity values can differ among people and communities and also recognises that changes can be made via increased and varied housing densities and types (Policy 6).
- 22 In light of the above, the RVA welcomes the Council’s intention to move away from reliance on existing amenity as a key determinant of what is suitable urban form and more to providing for urban areas that provide for current and future generations.¹⁰ However, the RVA is concerned the proposed urban form and development strategic provisions do not adequately give effect to the NPSUD. In particular, the proposed

⁵ Council Section 32 Assessment, page 43.

⁶ Ibid, page 18.

⁷ TD2050, page 11.

⁸ Ibid, page 11.

⁹ Ibid.

¹⁰ Council Section 32 Assessment, page 44.

provisions fail to adequately address the need for retirement and aged care accommodation.

- 23 Further, by failing to adequately provide for Taupō's ageing population, Chapter 2 does not adequately recognise the matters identified in TD2050, as outlined above. The RVA considers that incorporating the matters set out in TD2050 'by reference', as currently proposed in Objective 2.3.2(2) and Policy 2.3.3(3) is not appropriate. These matters should be clearly reflected and addressed in the District Plan.
- 24 Accordingly, the RVA seeks section 2.3 is amended to provide strong policy direction to enable intensification and the development of a variety of housing types, and specifically recognise the need for appropriate housing for the district's ageing population. The specific provisions of the proposal that RVA's submission relates to, and the relief sought by the RVA, are set out in **Appendix 1**.
- 25 As noted in our earlier submission, given the strategic nature of Chapter 2, the RVA does not request more specific objectives and policies than those outlined in **Appendix 1**, but seeks that the Council includes appropriate provisions to enable retirement and aged care accommodation in residential areas when it undertake its review of the Residential Chapter (to assist the Council prepare its second bundle of plan changes, **Appendix 1** includes the provisions sought by the RVA to be included in the Residential Chapter).

SUBMISSION ON PC39 – RESIDENTIAL BUILDING COVERAGE

- 26 As set out in our previous submission, the RVA welcomes and supports the proposed increase to the maximum building coverage for residential areas from 30% to 35%. As noted, while exceeding this standard will be appropriate for some developments, the RVA considers the proposal represents a reasonable increase that reflects the NPSUD and the need to provide for housing in the district.
- 27 As mentioned above, the RVA expects to provide feedback on the proposed changes to the Residential Chapter when it is made available.

DECISION SOUGHT

- 28 Without limiting the generality of the above, the RVA seeks:
- 28.1 the relief set out in **Appendix 1**; and
- 28.2 any alternative or consequential relief to address the matters addressed in this submission.
- 29 The RVA wishes to be heard in support of this submission.
- 30 If other make a similar submission, the RVA will consider presenting a joint case with them at the hearing.

Signed for and on behalf of Retirement Villages Association of New Zealand by:



John Collyns
Executive Director
9 December 2022

Address for service of submitter:

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APPENDIX 1 – THE RVA’S SPECIFIC SUBMISSION POINTS AND RELIEF SOUGHT

Submission Table

- We recommend using this submission table to state your submission points. This will assist Council to accurately record your submission points and ensure your submission is valid.
- Each individual submission point should be on a different row. Use as many rows as you require.
- You can attach additional commentary and documents should you need to.
- The examples in italics below are for guidance only to show how submission points could be set out and do not represent a position of Council.
- This form is for use for the following Plan Changes:
 - Plan Change 38 – Strategic Directions
 - Plan Change 39 – Residential Building Coverage
 - Plan Change 40 – Taupō Town Centre Environment
 - Plan Change 41- Removal of Fault lines
 - Plan Change 42 – General Rural and Rural Lifestyle Environments
 - Plan Change 43 – Taupō Industrial Environment Rezoning

Plan Change	Specific part/provision	Support? Oppose? Amend?	Relief sought	Reasons
State which Plan Change that your submission relates (see above)	State the specific part or provision of proposed Plan Change your submission relates to. If you cannot give a specific number Council Planners will add this for you.	choose one of the above	What decision are you seeking from the Council? What action would you like: Retain? Delete? Amend?	Include reason(s) for your submission point
PC 38 – Strategic Directions	Urban Form and Development, 2.3.2 Objective 1	Support	Retain	The RVA generally supports Objective 1 and the development of the district in a way that contributes to well-functioning and compact urban forms, connected livable communities, greater social and cultural vitality and wellbeing, and development in a manner that meets the community’s short, medium and long-term housing needs.

<p>PC 38 – Strategic Directions</p>	<p>Urban Form and Development, 2.3.2 Objective 2</p>	<p>Oppose in part</p>	<p>Amend</p>	<p>Objective 2 refers to the need to be consistent with the “TD2050 2018” to maximise the efficient use of land in co-ordination with the provision of cost effective infrastructure. The RVA considers that incorporating the matters of TD2050 ‘by reference’ is inappropriate. Any findings contained in this document, including the need to plan for housing demand, location and type in light of an ageing population, should be reflected in the District Plan. Further, given the changing nature of our urban environments, the Council may need to update its growth management strategy on an ongoing basis, which would render the reference to ‘TD2050 2018’ obsolete. The RVA considers the approach proposed by Objective 2.3.2(2) and Policy 2.3.3(3) will create uncertainty and inconsistent interpretations.</p> <p>The RVA also notes that it has no issues with maximising the efficient use of land but considers that the current drafting of the objective implies that this is the only outcome from the strategy that is relevant to use and development. Therefore, it is considered that the strategic direction objectives and policies need to provide for the additional components set out in TD2050, including providing for an ageing population.</p> <p>The RVA seeks the following amendments (using the terminology found in TD2050):</p> <p><i>Subdivision, use and development of land will: be consistent with TD2050 2018</i></p> <ul style="list-style-type: none"> <i>a. maximise the efficient use of zoned and serviced urban land <u>by enabling intensification and a diversity in housing types and lifestyles, especially meeting the needs of the increasingly ageing population;</u> and</i> <i>b. is co-ordinated with the provision of cost effective infrastructure.</i>
<p>PC 38 – Strategic Directions</p>	<p>Urban Form and Development, 2.3.2 Objective 3</p>	<p>Support in part</p>	<p>Amend</p>	<p>The RVA generally supports Objective 3 and the use and development of land which will have demonstrable social and cultural benefits to the district’s community. However, the RVA considers that the term “demonstrable” is unclear, unnecessary and is likely to lead to differing interpretations between</p>

				<p>Council and other plan users. The RVA therefore seeks the deletion of the term “demonstrable”.</p> <p>The RVA also considers that additional / specific reference should be made in the objective to the benefits of providing increased and diverse housing / accommodation options. In the alternative, the policies should identify the social benefits of land use development, which should include recognition of increased and diverse housing / accommodation options.</p>
PC 38 – Strategic Directions	Urban Form and Development, 2.3.2 Objective 6	Support	Retain	<p>The RVA welcomes the Council’s move away from requiring subdivision, use and development to not detract from “the wider character” of the environment, as previously proposed.</p> <p>The RVA generally supports Objective 6 and the enabling of use and development that supports the planned urban built form and functioning of the environment.</p>
PC 38 – Strategic Directions	Urban Form and Development, 2.3.2 Objectives	Support	Amend	<p>The RVA seeks that a new objective is inserted that provides for the housing and care needs of the ageing population as follows:</p> <p><i><u>Objective 2.3.2(8). Recognise and enable the housing and care needs of the ageing population.</u></i></p>
PC 38 – Strategic Directions	Urban Form and Development, 2.3.3 Policy 2	Support in part	Amend	<p>The RVA supports the enabling of planning and development in urban environments that will positively contribute to well-functioning urban environments. However, the RVA considers that this matter is already sufficiently covered by the higher-level direction set out in proposed Objective 1. Therefore, the RVA seeks that Policy 2 be amended to provide more specific direction / guidance relating to a course of action required in order to achieve the outcome sought by Objective 1, including by enabling a range of building typologies to meet the varied needs of the community.</p>

PC 38 – Strategic Directions	Urban Form and Development, 2.3.3 Policy 3	Support in part	Amend	<p>While the RVA supports the underlying principle of Policy 3, it is noted that the policy is effectively identical to the associated objective (Objective 2). Taking into account the RVA’s key concerns with proposed Objective 2 (as set out above), the RVA seeks that proposed Policy 3 is amended to provide clear direction or a course of action that is required in order to achieve the outcome sought by Objective 2.</p>
PC 38 – Strategic Directions	Urban Form and Development, 2.3.3 Policy 6	Support in part	Amend	<p>While the RVA supports the underlying principle of Policy 6 and the provision for use and development of land that will lead to beneficial social and cultural outcomes for the district’s community, it is noted that the policy is effectively identical to the associated objective (Objective 3).</p> <p>Taking into account the RVA’s key concerns with proposed Objective 3 (as set out above), the RVA considers that the policy should be amended to include specific reference to the benefits of providing increased and diverse housing / accommodation options, particularly retirement and aged care accommodation. Further, recognition should be made of the benefits of a variety of accommodation types and developments, including more intensive or higher density developments of the type supported by the NPSUD and TD2050.</p>
PC 38 – Strategic Directions	Urban Form and Development, 2.3.3 Policy 10	Oppose in part	Amend	<p>While the RVA generally supports the underlying purpose of Policy 10 to manage adverse effects of the use and development of land, it considers that as currently drafted the policy may have more restrictive effects than intended.</p> <p>In particular, the RVA considers that the language of clause (a) is too directive / restrictive and is likely to restrict the level of development and use sought by other objectives and policies of PC38. As currently drafted, the policy could be interpreted as an “avoid” policy whereby any adverse effect on the functioning of the environment resulting from subdivision, use and development must be avoided, as opposed to allowing for adverse effects to be remedied or mitigated for example.</p> <p>Furthermore, the RVA notes that proposed clauses (b) and (d) address the same matter (reverse sensitivity effects). As such, the RVA recommends that clause (b) is removed, and clause (d) retained to cover reverse sensitivity effects.</p>

				<p>Taking into account the above, the RVA seeks the following amendments:</p> <p><i>Manage subdivision, use and development of land to ensure that it will not in a way that considers:</i></p> <ul style="list-style-type: none"> a. have an <i>adverse effects on the functioning of the environment where it is located,</i> b. unduly conflict with existing activities on adjoining properties, c. compromise development consistent with <i>the intent and planned urban built form of the environment where it is located</i> d. give rise to <i>reverse sensitivity effects from existing uses</i>
PC 38 – Strategic Directions	Urban Form and Development	Support	Amend	<p>Given the high-level strategic direction of section 2.3 the RVA does not request any additional objectives and policies to those referred to above, but seek the following policies be included when the Council prepares its Residential Chapter:</p> <p><u>Changing communities:</u> <i>To provide for the diverse and changing residential needs of communities, recognise that the existing character and amenity of the Residential Environment will change over time to enable a variety of housing types with a mix of densities.</i></p> <p><u>Larger sites:</u> <i>Recognise the intensification opportunities provided by larger sites within the Residential Environment by providing for more efficient use of those sites.</i></p> <p><u>Provision of housing for an ageing population:</u></p> <ul style="list-style-type: none"> (a) <i>Provide for a diverse range of housing and care options that are suitable for the particular needs and characteristics of older persons in the Residential Environment, such as retirement villages.</i> (b) <i>Recognise the functional and operational needs of retirement villages, including that they:</i> <ul style="list-style-type: none"> i. <i>May require greater density than the planned urban built character to enable efficient provision of services.</i> ii. <i>Have unique layout and internal amenity needs to cater for the requirements of residents as they age.</i>

				<p><u>Role of density standards:</u> <i>Enable the density standards to be utilised as a baseline for the assessment of the effects of developments.</i></p>
PC 39 – Residential Building Coverage	4a.1 Performance Standards – Development Controls – 4a.1.1	Support	Retain	<p>The RVA supports the proposed increase to the maximum building coverage for residential areas from 30% to 35%. The RVA considers this to be a reasonable increase that reflects the NPSUD and the need to provide for housing in the district. The RVA notes however that exceedances of this standard will be appropriate for some developments in residential areas, such as retirement villages. Because of their functional and operational needs, retirement village and aged care facilities tend to be larger than surrounding residential housing, and may require a greater building coverage, in order to properly cater for resident needs. However, retirement villages often include a range of options to manage stormwater and provide high quality environments for their residents.</p>



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Last name: Penton

On behalf of:
 LWAG

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Country: New Zealand
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- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I 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 the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

File
LWAG submission draft District Plan changes December 2022

Lakes & Waterways Action Group Trust submission to the draft District Plan changes 38-43

5th December, 2022

Lakes and Waterways Action Group Trust would like to thank the Council for the opportunity to comment on the draft District Plan changes.

RE: STRATEGIC DIRECTIONS

- LWAG support '2.2 STRATEGIC DIRECTION 2 FRESHWATER QUALITY / TE MANA O TE WAI'

As with past submissions on water quality and quantity LWAG have sought that LID principles be incorporated into subdivision and land use change. We have seen considerable advances in their inclusion in local greenfield developments.

However potable water is an expensive resource for this community and our per capita water use remains high compared to other districts. While understanding government changes to water supply are pending, LWAG are concerned that TDC has not included specific planning provisions relating to rainwater collection - either retrofitting or for new builds.

When requesting the specifications for the Waiora House build at the last Annual Plan submission round we received this information as part of the list of sustainability principles incorporated into the design:

'Rainwater harvesting system – With hot dry summers, and a large external area to maintain, we have designed a rainwater harvesting system to feed the irrigation of the site, as well as the toilet facilities – so these do not draw on the mains water supply. A 30,000-litre water tank will capture over half the roof area and provide ample irrigation and plumbing to those linked services.'

- LWAG ask that Strategic Directions include provision for all new builds to incorporate rainwater harvesting systems designs to use water for on-site irrigation and toilet facilities (as per above).
- LWAG support the inclusion of 2.4 Strategic Direction 4 Climate Change including the proviso that: *'The Strategic Directions for climate change are consistent with the Government's obligations to achieve net zero carbon emissions by 2050 and accords with the target for 100% renewable electricity generation by 2030.'*

However, LWAG ask how this translates into the DP changes 38-43?

We note for instance that, PC 40 relating to Taupō Town Centre Precincts does not include objectives or policy relating to '2.4 STRATEGIC DIRECTION 4. CLIMATE CHANGE 3. Urban and built development must be designed in a manner which considers the need to reduce greenhouse gas emissions associated with that development and resulting land use'

- LWAG seek an objective be included to this effect

- LWAG ask that clarity be provided on how reduction of greenhouse gas emissions will be measured and monitored for the planning, implementation and outcome of built development

REF: 2.4 STRATEGIC DIRECTION 4 CLIMATE CHANGE

- LWAG wholly support the inclusion of Climate change as strategic Direction 4 for the Taupō District Plan.

Comment: We understand that Strategic Direction 4. Likely relates to the newly adopted Emissions Reduction Targets & Directives. However, we feel that further detail would be helpful in the DP Strategic Direction and specific Chapters under review.

Re: 2.4.2 *Objective 1. Subdivision, use and development of land in the Taupō District will result in positive climate change outcomes.*

- As per above we ask that direction is given clarifying how how greenhouse gas emission budgets will be incorporated into a change of land use or for new developments in the urban area and Taupo Town Centre .

Re: Plan Change 40 Taupo Town Centre

As per our previous comments: Taupo is traditionally a low-rise urban landscape which is valued, we believe, by both residents and visitors. We are concerned with the adverse amenity effects of 4-story buildings on the lakeshore and their visual impact in the newly upgraded lakefront area (Robert St/Lake Tce). Also, the visual amenity from the Lake itself will be adversely affected by this development.

- LWAG ask that any multi-story buildings be limited to a zone at least two blocks back from the road/lakefront in the Taupo Town Centre.

We note that provisions for increased building heights mean more people living/working/staying in the Town Centre.

- Ref: 4.g.1 Performance Standards '*ADDITIONAL PERFORMANCE STANDARDS FOR THE PEDESTRIAN PRECINCT*' LWAG ask that this include performance standard for the provision for secure multi-use active transport parking (Ebikes, bikes, scooters etc)

Revegetation of the Taupo Town Centre is effective in reducing greenhouse gases and has a positive effect on our wellbeing. Allowing increased height in the Town Centre should require provisions for increased vegetation. LWAG ask how this is being encouraged in the Town Centre?

- We seek provisions for tree planting/vegetation, and the encouragement of incorporating vertical gardens/rooftop gardens into building design to be included in performance standards in the Taupō Town Centre environment.
- LWAG ask that performance standards include provision for all new builds to incorporate rainwater harvesting systems designs (as per above).

RE: PLAN CHANGE 42 - GENERAL RURAL ENVIRONMENT & RURAL LIFESTYLE ENVIRONMENT

Plan Change 42- General Rural & Rural Lifestyle Environments:

In general the TCAG supports residential development close to town to minimise travel (Greenhouse gas emissions) and pressure on infrastructure including water supply in a climate stressed world. We understand this preference is in line with TDC 's latest Growth Management Strategy.

Ideally rural residential areas would be adjacent to residential developments, for instance a variety of lot sizes in the Nukahau Plan Change would have provided for this. Public transport and active transport can be facilitated close to urban areas in the District.

While we support the Rural Lifestyle rezoning in principle, we are concerned that allowing further subdivision in these areas will increase carbon emissions as there will be increased travel.

Allowing increased vehicle movements from intensified Rural Lifestyle zone does not fit with Strategic Direction 1. *'Subdivision, use and development of land in the Taupo District will result in positive climate change outcomes.'*

- We ask that Rural Lifestyle subdivision be limited to the periphery of existing urban areas, not those identified in the Rural areas.

Further comment: It is likely that the provision for subdivision within a Rural Lifestyle zone but not on the periphery adjacent to the Rural zone, while commendable in terms of amenity, will be problematic as landowners will likely contest their ability to subdivide if their neighbours are able to do this on a similar lot size. I.e. within the zone itself. We foresee issues of precedent being set in these situations and further erosion of the rural amenity and increased lot numbers being enabled over time.

RE: 4b. Rural Environment

TCAG agrees with WRC's previous comments to the Draft DP that *'development should be situated away from natural gully systems and that gully vegetation should be managed to avoid exacerbating actual or potential erosion (and related) risks. Identification and protection of natural gullies should be mandatory for all development in the district.'*

TCAG commend the council on working with developers in urban areas and support the protection and revegetation of gullies in the district. They can, as is well understood, have multiple benefits, not least as carbon sinks, for recreational use but also serve as invaluable ecological corridors in urban as well as rural areas.

- TCAG request consideration be given to natural gully systems in the General Rural Environment and proposed Rural Lifestyle Zone including general protection, restricted land use in close proximity to, restricted or controlled access, vegetation enhancement and management, erosion control.

Comment: We understand that identifying gullies would be possible via a GIS analysis process. This is well within the capability of Taupō District Council particularly given that there are significant LiDAR datasets currently being processed by LINZ as part of the Elevation Aotearoa programme

As per previous comments LWAG support TDC 's intention to: *'keep large spaces of land available for productive use. aiming to keep property sizes large and limit the number and location of houses.'*

- LWAG generally support the objectives and policy in this draft plan change.

RE: 4b. Rural Environment

LWAG agrees with WRC 's previous comments to the Draft DP that *'development should be situated away from natural gully systems and that gully vegetation should be managed to avoid exacerbating actual or potential erosion (and related) risks. Identification and protection of natural gullies should be mandatory for all development in the district.'*

- LWAG request consideration be given to natural gully systems in the General Rural Environment and proposed Rural Lifestyle Zone including provisions for general protection, restricted land use in close proximity to, restricted or controlled access, vegetation enhancement and management, erosion control.

Comment: We understand that identifying gullies would be possible via a GIS analysis process. This is well within the capability of Taupō District Council particularly given that there are significant LiDAR datasets currently being processed by LINZ as part of the Elevation Aotearoa programme.

Comment Re: Chapter 10 of the Regional Plan nitrogen discharge rules. LWAG have historically asked that all subdivision/land use change provide a N budget. We are concerned that providing for 2 ha subdivision in the rural areas gives a green light for increased intensification (e.g., more grazing animals and larger human population) without regard to the potential effects on Lake Taupo water quality.

- LWAG ask that the provisions ensure that the N restrictions apply to land use in the rural lifestyle zone.

LWAG are concerned that allowing further subdivision in rural areas is not congruent with Strategic Direction 1. *'Subdivision, use and development of land in the Taupo District will result in positive climate change outcomes.'* as it will potentially increase carbon emissions as there will be increased travel.

We seek Rural Lifestyle subdivision is limited to a zone adjacent to existing urban areas, i.e. not permitted in the Rural areas.

RE: RESIDENTIAL COVERAGE – CHANGE OF COVERAGE RULE - to increase the maximum building coverage in residential areas to 35%. ’

Comment: LWAG see that there are advantages to consolidating subdivision in the residential zone. However, we are concerned by the lack of provisions to prevent **the restriction of hard surfaces** in the residential zone. Hard surfaces such as paved and concrete areas mean reduced opportunities for capturing rainwater. There is increased potential for pollutant and nutrient pathways to Lake Taupo via stormwater systems .

Of specific concern is that the total coverage rule doesn’t restrict permeable surfaces. We understand that the review of the Residential Rules is pending, however, the coverage rule change will impact stormwater and we feel it needs to be addressed.

LWAG are also concerned that increasing building coverage will reduce vegetation in urban areas.

- LWAG therefore seek amending wording of the total coverage rule to have a limit on impermeable surfaces.
- We ask that a minimum of 10% of vegetation be retained per site

Re: INDUSTRIAL – ADDITIONAL INDUSTRIAL LAND ZONINGS

Ref 4.h.37 & our previous comment: ‘Low-impact design principles require monitoring and enforcing.’

- LWAG support the requirement for ‘*a stormwater management plan*’ and ask that these are enforceable.

Organisation:

Kainga Ora

First name: Gurv**Last name:** Singh**Postal address:** PO Box 2628**Suburb:****City:** Wellington**Country:** New Zealand**Postcode:** 6140**Email:** gurv.singh@kaingaora.govt.nz**Daytime Phone:** 021 1906349

- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I 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 the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

If others make a similar submission, Kāinga Ora are happy to consider presenting a joint case at a hearing.

Attached Documents

File
PDF - District Plan Submission - Kainga Ora - PC38
PDF - District Plan Submission - Kainga Ora - PC39

File

PDF - District Plan Submission - Kainga Ora - PC40



8th December 2022

Attn: Taupō District Council
30 Tongariro St
Taupō Central
Taupō 3330
Submission via email: info@taupo.govt.nz

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON
A NOTIFIED PROPOSAL FOR PLAN CHANGE 38 ON THE
OPERATIVE TAUPŌ DISTRICT PLAN UNDER CLAUSE 6 OF
SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT 1991**

This is a submission by Kāinga Ora – Homes and Communities on Plan Change 38 – Strategic Direction (“PC38”) from Taupō District Council (“the Council” or “TDC”) on the Taupō District Plan (“the Plan” or “the District Plan”):

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

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

The PC38 in its entirety.

This document and the Appendices attached is Kāinga Ora submission on PC38.

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 Waikato Region.
3. Kāinga Ora therefore has an interest in the PC38 and how it:
 - a) Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”);
 - b) Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental and market housing; and
 - c) Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
4. The Kāinga Ora submission seeks amendments to the PC38 in the following provisions:
 - i. **Tangata Whenua** – Amendments are sought to enable papakāinga development in urban areas and on general title land, in addition to development on Māori land. Kāinga Ora considers papakāinga housing to be inherently residential in nature and provisions should be written in a manner to reflect this and to allow Māori to develop housing that meets their cultural norms which is not restricted to Māori title land only. Moreover, the provision of a permissive framework for papakāinga housing is in accordance with policy 1(a)(ii) of the NPS-UD.

- ii. **Urban Form and Development** – Amendments are sought to include mixed use development within the strategic direction of the Taupō town centre. Kāinga Ora recognises the need to retain commercial activities in the Town Centre and to ensure these activities are consolidated. However, the Town Centre should also provide for residential activities in the form of a mix of apartments and higher density living within close proximity to amenities. Enabling papakāinga development in urban area and on general titled land, in addition to development on Māori land, is also sought.
 - iii. **Freshwater Quality / Te Mana o Te Wai** – Whilst PC38 proposes a policy to give effect to Te Ture Whaimana o Te Awa o Waikato - the Vision and Strategy for the Waikato River (**‘Te Ture Whaimana’** or **‘the Strategy’**), Kāinga Ora considers that an objective should be included under PC38 to further support the application of Te Ture Whaimana within the District Plan. Given the significance of Te Ture Whaimana under the NPS-UD and the absence of Te Ture Whaimana within the District Plan, Kāinga Ora consider that an objective focusing on giving effect to Te Ture Whaimana would effectively guide a focus around Te Ture Whaimana within the District Plan, as intended under the NPS-UD. Kāinga Ora suggests the Council may want to undertake a plan review to ensure that the District Plan gives effect to Te Ture Whaimana as proposed under PC38.
5. Kāinga Ora understands that Plan Change 39 is limited to the amendment of the building coverage standard only and a plan change focusing on the whole Residential Environment Chapter is to follow. Kāinga Ora questions whether the proposed strategic direction and changes on Urban Form and Development in PC38 provides for this future plan change in terms of the planned residential capacity that has not been included in Plan Change 39. Kāinga Ora seeks that the Council propose changes to the District Plan to recognise the planned residential capacity and growth anticipated in the region through PC38 and Plan Change 39, or in the new proposed plan change that focuses on changes to the Residential Environment Chapter. Noting this, Kāinga welcomes the opportunity for further discussion and to provide feedback on this future plan change.
6. The changes requested are made to:
- a) Ensure that Kāinga Ora can carry out its statutory obligations;
 - b) Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;

- c) Ensure that the s32 analysis has appropriately analysed and considered other reasonable options to justify the proposed plan provisions;
- d) Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
- e) Provide clarity for all plan users; and
- f) Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.

7. 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 Taupō District Council:

That the specific amendments, additions or retentions which are sought as specifically outlined in this **document and Appendix 1**, are accepted and adopted into the District Plan, 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 PC38 to address the matters raised in its submission.

If others make a similar submission, Kāinga Ora are happy to consider presenting a joint case at a hearing.

Kāinga Ora – Homes and Communities



Claire Kirman

Special Counsel – Urban Development

ADDRESS FOR SERVICE:

Kāinga Ora – Homes and Communities

PO Box 74598

Greenlane, Auckland

Attention: Development Planning Team

Email: developmentplanning@kaingaora.govt.nz

Appendix 1: Decisions sought on the Plan Change 38

The following table sets out the amendments sought to the Plan Change 38 and also identifies those provisions that Kāinga Ora supports.

Proposed changes are shown as ~~strikethrough~~ 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 struck through for deletion and <u>underlined</u> for proposed additional text.</i>
Plan Change 38 – Chapter 2 Strategic Directions					
1.	2.1.2(4)	Support development on Māori land that meet the needs of those landowners and respects the land, water, significant sites and Wāhi tapu.	Support in part	Whilst Kāinga Ora supports the objective of supporting development on Māori land, Kāinga Ora consider that papakāinga development in urban areas and on general title land should also be encompassed within this objective. Kāinga Ora considers papakāinga housing to be inherently residential in nature and provisions should be drafted to reflect this to allow Māori to develop housing that meets their cultural norms which is not restricted to Māori title land only. Moreover, the provision of a permissive framework for papakāinga housing is in accordance with policy 1(a)(ii) of the NPS-UD.	Amend 2.1.2(4) as follows: Support <u>papakāinga on sites within urban areas, including general title land, as well as</u> development on Māori land that meet the needs of those landowners and respects the land, water, significant sites and Wāhi tapu.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
2.	2.1.3(6)	Enable development of Māori Land within the provisions of the plan for the purposes of fulfilling the economic and social aspirations of those owners.	Support in part	Whilst Kāinga Ora supports the objective of supporting development on Māori land, Kāinga Ora seeks that papakāinga development in urban areas and on general title land be encompassed within this objective. Kāinga Ora considers papakāinga housing to be inherently residential in nature and provisions should be drafted to reflect this to allow Māori to develop housing that meets their cultural norms which is not restricted to Māori title land only. Moreover, the provision of a permissive framework for papakāinga housing is in accordance with policy 1(a)(ii) of the NPS-UD.	<p>Amend 2.1.3(6) as follows:</p> <p>Enable <u>the development of papakāinga in urban areas, including on general title land, as well as</u> development of Māori Land within the provisions of the plan for the purposes of fulfilling the economic and social aspirations of these <u>Māori</u>.</p>

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

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
3.	2.2.2	New Objective proposed.	-	<p>Whilst PC38 proposes a policy to give effect to Te Ture Whaimana o Te Awa o Waikato - the Vision and Strategy for the Waikato River ('Te Ture Whaimana' or 'the Strategy'), Kāinga Ora consider that an objective should also be included under PC38 to further support the application of Te Ture Whaimana within the District Plan.</p>	<p>Insert a new objective under Freshwater Quality /Te Mana o Te Wai, as follows:</p> <p><u>2.2.2(2) The health and wellbeing of the Waikato River is restored and protected so that it may sustain abundant life and prosperous communities.</u></p>
4.	2.3.2(5)	The Town Centre Environment is strengthened and reinforced as the primary commercial, retail, recreational, cultural and entertainment centres for Taupō District.	Support in part	<p>Kāinga Ora recognises the need to retain commercial activities in the Town Centre and to ensure these activities are consolidated. However, the Town Centre should also provide for residential activities in the form of a mix of apartments and higher density living within close proximity to amenities. Kāinga Ora seeks that these objectives recognise the level of intensity and change in</p>	<p>Amend 2.3.2(5) as follows:</p> <p>The Town Centre Environment is strengthened and reinforced as a <u>mixed use area, which includes residential activities while also being the primary commercial, retail, recreational, cultural and</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				housing typology required to cater for the growing population in Taupō. This also provides a mix of housing choice.	entertainment centres for Taupō District.
5.	2.3.2(6)	Subdivision, use and development will not detract from the planned urban built form and effective functioning environment where it is located.	Support in part	Kāinga Ora considers protective language such as ‘detract’ to be limiting of new or alternative housing developments and higher densities. Moreover, it does not enable change. Further, requiring subdivision, use and development to maintain the ‘effective functioning environment’ limits the potential of future development to the existing functioning environment.	Amend 2.3.2(6) as follows: Subdivision, use and development will not detract from the planned urban built form and effective functioning environment where it is located <u>provide for a level of amenity that is reflective of the planned urban environment.</u>
6	2.3.3(6)	Provide for subdivision, use and development of land that will lead to demonstrate beneficial social and cultural outcomes for the District’s community.	Support	Kāinga Ora generally supports this policy and recognises the need to provide for the social outcomes for the local community, which includes more affordable housing choice to cater for the growing population in Taupō.	Retain as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
7.	2.3.3(7)	Provide for the development of Papakāinga on māori land to facilitate māori occupation on their ancestral land.	Support in part	<p>Kāinga Ora seeks that both the restriction on locating papakāinga on “Māori land”, or land which is otherwise under the jurisdiction of the Māori Land Court is removed and that a revised definition is included within the plan change to allow mana whenua to develop papakāinga on general title land – noting that the current definition of papakāinga is limited to land held under the Te Ture Whenua Maori Act (1993). Moreover, Kāinga Ora seeks amendments to ensure that provision is made for a permitted level of papakāinga development, similar to that of general residential developments, with the residential zones. Kāinga Ora considers papakāinga housing to be inherently residential in nature and provisions should be drafted to reflect this. Moreover, the provision of a permissive</p>	<p>Amend 2.3.3(7) as follows:</p> <p>Provide for the development of Papakāinga. on māori land to facilitate māori occupation on their ancestral land <u>This includes enabling papakāinga in urban settings, including general and Māori title land.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought <i>Proposed changes are shown as struckthrough for deletion and <u>underlined</u> for proposed additional text.</i>
7.	2.3.3(8)	Maintain strong boundaries to the town centre to consolidate and intensify retail, commercial and office activities within the city centre and protect planned built form of residential environments.	Support in part	<p>framework for papakāinga housing is in accordance with policy 1(a)(ii) of the NPS-UD.</p> <p>Kāinga Ora generally supports the need to retain commercial activities in the Town Centre and to ensure these activities are consolidated, while also providing for residential activities in the form of a mix of apartments and higher density living.</p>	<p>Amend 2.3.3(8) as follows:</p> <p>Maintain strong boundaries to the town centre to consolidate and intensify <u>residential</u>, retail, commercial and office activities within the city centre and protect planned built form of residential environments.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought <i>Proposed changes are shown as struckthrough for deletion and <u>underlined</u> for proposed additional text.</i>
8.	2.3.3(9)	Restrict the location and development of retail and commercial activities within non-commercial areas of the district to ensure that the town centre continues to be the districts pre-eminent retail, commercial and mixed use centres.	Support in part	Kāinga Ora generally supports the need to retain commercial activities in the Town Centre and to ensure these activities are consolidated, but seeks that residential activities in the form of a mix of apartments and higher density living is also provided for. These policies should recognise the level of intensity and change in housing typology required to cater for the growing population in Taupō.	Amend 2.3.3(9) as follows: Restrict the location and development of retail and commercial activities within non-commercial areas of the district to ensure that the town centre continues to be the districts pre-eminent retail, commercial and mixed use centres <u>while also providing for high density residential activities within the town centre.</u>



8th December 2022

Attn: Taupō District Council
 30 Tongariro St
 Taupō Central
 Taupō 3330
Submission via email: info@taupo.govt.nz

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON
 A NOTIFIED PROPOSAL FOR PLAN CHANGE 39 ON THE
 OPERATIVE TAUPŌ DISTRICT PLAN UNDER CLAUSE 6 OF
 SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT 1991**

This is a submission by Kāinga Ora – Homes and Communities on Plan Change 39 – Residential Building Coverage (“PC39”) from Taupō District Council (“the Council” or “TDC”) on the Taupō District Plan (“the Plan” or “the District Plan”):

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

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

The PC39 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 Waikato Region.
3. Kāinga Ora therefore has an interest in the PC39 and how it:
- a) Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”)
;
 - b) Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental and market housing; and
 - c) Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
4. The Kāinga Ora submission seeks amendments to the building coverage standard within the Residential Environment as proposed by PC39. Whilst Kāinga Ora supports the increase of building coverage as sought by PC39, Kāinga Ora considers that a 40% building coverage would be more appropriate than the proposed 35% to enable more building typologies and housing choices within the main residential zone of the District.
5. The changes requested are made to:
- a) Ensure that Kāinga Ora can carry out its statutory obligations;
 - b) Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
 - c) Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;

- d) Provide clarity for all plan users; and
 - e) 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 Taupō District Council:

That the specific amendments, additions or retentions which are sought as specifically outlined in **this document and in Appendix 1**, are accepted and adopted into the District Plan, 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 PC39 to address the matters raised in its submission.

If others make a similar submission, Kāinga Ora are happy to consider presenting a joint case at a hearing.

Kāinga Ora – Homes and Communities



Claire Kirman

Special Counsel – Urban Development

ADDRESS FOR SERVICE:

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PO Box 74598
Greenlane, Auckland
Attention: Development Planning Team
Email: developmentplanning@kaingaora.govt.nz

Appendix 1: Decisions sought on Plan Change 39

The following table sets out the amendments sought to the Plan Change 39.

Table 1

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
Plan Change 39 – Chapter 4a Residential Environment					
1.	4a.1.1(i)	Maximum building coverage: 35%	Oppose in part	Kāinga Ora seeks that the maximum residential building coverage is increased to 40%. Kāinga Ora consider that 40% is a more appropriate threshold, as this will provide for more development potential on a site, housing typology options and is a more efficient use of land.	Amendments to plan provisions sought are shown in red with deletions shown as strike-through and additions shown <u>underlined</u> . Maximum building coverage: 35% <u>40%</u>



8th December 2022

Attn: Taupō District Council
30 Tongariro St
Taupō Central
Taupō 3330
Submission via email: info@taupo.govt.nz

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON
A NOTIFIED PROPOSAL FOR PLAN CHANGE 40 ON THE
OPERATIVE TAUPŌ DISTRICT PLAN UNDER CLAUSE 6 OF
SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT 1991**

This is a submission by Kāinga Ora – Homes and Communities on Plan Change 40 – Taupō Town Centre (“PC40”) from Taupō District Council (“the Council” or “TDC”) on the Taupō District Plan (“the Plan” or “the District Plan”):

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

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

The PC40 in its entirety.

This document and the Appendices attached is Kāinga Ora submission on PC40.

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 Waikato Region.
3. Kāinga Ora therefore has an interest in the PC40 and how it:
 - a) Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”);
 - b) Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental and market housing; and
 - c) Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
4. The Kāinga Ora submission seeks amendments to the PC40 regarding the **Building height limit within the Town Centre Environment** and **Spatial application of the Taupō Town Centre Environment Height Overlays**, as sought in Appendix 1 and 2.
5. Amendments are sought to the proposed height limits within the Taupō Town Centre Environment as follows:
 - a) Extend the 18m height limit over the central area of the Taupō Town Centre Environment, as indicated in **Appendix 2**. Kāinga Ora consider that this will

better provide for additional development capacity within the town centre that will be required to cater for the growing population in Taupō.

- b) Apply the 15m height limit across majority of the Taupō Town Centre Environment, as indicated in **Appendix 2**, except where 18m is proposed and to be enabled under PC40. Kāinga Ora considers this will enable the intensification potential that will be required within the town centre to provide greater housing choices and typology and additional commercial space to address the growing population of Taupō.
 - c) Retain the existing height limit for the Tongariro Domain. Kāinga Ora considers that the sites bordering the Waikato River should be excluded from the proposed height limit increase due to the nature of the site being a public open space.
6. The changes requested are made to:
- a) Ensure that Kāinga Ora can carry out its statutory obligations;
 - b) Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
 - c) Ensure that the s32 analysis has appropriately analysed and considered other reasonable options to justify the proposed plan provisions;
 - d) Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
 - e) Provide clarity for all plan users; and
 - f) Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.
7. **Appendix 1** – Table 1: Identifies the specific submission points and amendments to the District Plan under the proposed provisions of PC40 that Kāinga Ora either supports, opposes or seeks amendment.
8. **Appendix 2** – Identifies the spatial application increased height building height limit that Kāinga Ora consider to be appropriate, in replacement of the proposed building height increase under PC40.

Kāinga Ora seeks the following decision from Taupō District Council:

That the specific amendments, additions or retentions which are sought as specifically outlined in **this document and Appendix 1-2**, are accepted and adopted into the District Plan, 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 PC40 to address the matters raised in its submission.

If others make a similar submission, Kāinga Ora are happy to consider presenting a joint case at a hearing.

Kāinga Ora – Homes and Communities



Claire Kirman

Special Counsel – Urban Development

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Appendix 1: Decisions sought on Plan Change 40

The following table sets out the amendments sought to the Plan Change 40 and also identifies those provisions that Kāinga Ora supports.

Table 1

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
Plan Change 40 – Chapter 4g Taupō Town Centre Environment					
1.	4g.1.9(i) – (ii)	<p>The total maximum height of any building shall be as follows:</p> <p>i. Maximum height of three (3) floors above ground level except where provided by (ii) below:</p> <p>ii. The maximum height of any building shall be in accordance with the Taupō Town</p>	Oppose in part	<p>Kāinga Ora oppose a height limit of three (3) floors within some parts of the Taupō Town Centre Environment. Kāinga Ora considers this limits the intensification potential that will be required within the town centre to provide greater housing choices and typology and additional commercial space to address the growing population of Taupō. Kāinga Ora seeks that the maximum height of 15m and 18m is applied across the Taupō Town Centre Environment instead of limited pockets, except where 18m is proposed and enabled in the notified PC.</p>	<ol style="list-style-type: none"> Amend the planning maps as shown within Appendix 2. Accept the spatial height change sought in the submission into the Plan. Undertake any consequential changes necessary across the District Plan to address and give effect to this submission.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		Centre Environment Height Overlays in the planning maps.		<p>Kāinga Ora also consider that the sites bordering the Waikato River should also be excluded from the proposed height limit increase due to the nature of the site being a public outdoor living space. The changes sought are shown within Appendix 2.</p> <p>Kāinga Ora also seeks that the height is stipulated in metres rather than storeys to remove ambiguity from the rule.</p>	
2.	4g.1.10(i) – (ii)	<p>Taupō Town Centre Environment Height Overlays</p> <p>i. Any building, or part of any building, located within the Taupō Town Centre Environment Height Overlays in the</p>	Oppose in part	<p>Kāinga Ora oppose a height limit of three (3) floors within some parts of the Taupō Town Centre Environment. Kāinga Ora considers this limits the intensification potential that will be required within the town centre to provide greater housing choices and typology and additional commercial space to address the growing population of Taupō. Kāinga Ora seeks that the maximum height of 15m</p>	<ol style="list-style-type: none"> 1. Amend the planning maps as shown within Appendix 2. 2. Accept the spatial height change sought in the submission into the Plan. 3. Undertake any consequential changes necessary across the

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>planning maps that exceed a total height of (3) floors above ground.</p> <p>ii. Any application arising from this rule shall not be limited or publicly notified.</p>		<p>and 18m is applied across the Taupō Town Centre Environment instead of limited pockets, except where 18m is proposed to be enabled under notified PC40. Kāinga Ora also consider that the sites bordering the Waikato River should also be excluded from the proposed height limit increase due to the nature of the site being a public outdoor living space. The changes sought are shown within Appendix 2. Kāinga Ora also seeks that the height is stipulated in metres rather than storeys to remove ambiguity from the rule.</p>	<p>District Plan to address and give effect to this submission.</p>

Appendix 2: Kāinga Ora changes sought to the planning maps in PC40



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Last name: Delich

On behalf of:
Taupō Climate Action Group

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City: Taupo

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- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I 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 the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

If required, TCAG is happy to present a combined oral submission with other individuals or groups with similar concerns.

Attached Documents

File

TCAG Submission to DP Changes 9 Dec 2022 Final draft

Taupō Climate Action Group (TCAG) Draft Submission to TDC DP Changes 38-43

9 December 2022

Plan Change 38 - Strategic Directions

We strongly support the inclusion of Climate change as strategic Direction 4 for the Taupō District Plan. However, we believe that the objectives are not strong enough to drive low emissions development in our district.

For example, proposed 2.4.2 Objective 1. *"Subdivision, use and development of land in the Taupō District will result in positive climate change outcomes."*

- We ask that this objective could be made stronger to state "Subdivision, use and development of land in the Taupō District will minimise greenhouse gas emissions and result in positive climate change outcomes."
- We ask that the wording in the climate change strategic direction 4 be consistent with new legislation, including the NPSUD and Natural and Built Environment Bill which have stronger statements including, supporting reduction in greenhouse gas emissions and are resilient to current and future effects of climate change and the reduction in risks arising from, and better resilience.

Regarding Policy 2.4.3 (2) – *land use activities which unduly accelerate effects of climate change will be discouraged.*

We ask how this will be discouraged through the District Plan and whether any additional rules or other methods are proposed in order to discourage this?

Regarding Policy 2.4.3 (3) – *subdivision, use and development must demonstrate resilience to the effects of climate change over time.*

We ask what rules or methods will be used to require this to be demonstrated by subdivision proposals and development? There are no objectives, policies, rules or other methods relating to these climate change matters in the District Plan at present. Objectives, policies, rules and methods may need to be added to other chapters of the District Plan in order for this strategic direction to be effective and to provide clarity on what is actually required. [RH1]

Regarding Policy 2.4.3(4) - Urban and built development must be designed in a manner which considers the need to reduce greenhouse gas emissions associated with that development and resulting land use.

We ask how will this be measured? We note that the newly adopted TDC Emissions Reduction Targets & Directive has targets that are in-line with current national emissions budgets and 2050 targets. For instance, procurement, including in relation to subdivision and development, is an area where greenhouse emissions can be effectively reduced.

- We seek that the Strategic Directions clarify how an energy audit and/or emission budget will be required for a change of land use or for new developments in the urban area and Taupo Town Centre.
- We ask that the Strategic Directions are more specific as to how developments include and demonstrate measures to reduce carbon.
- We ask that Strategic Direction 4. provide more clarity regarding methods for reducing emissions in line with TDC's Emissions Reduction Targets & Directives.

2.3 Strategic Direction 3 Urban Form and Development

- TCAG support this section in principle

- TCAG seek objectives and policy to be included relating to preserving and enhancing biodiversity in the urban zones (this also relates to climate change objectives above & '2.3.3 5. *Support subdivision, use and development of land that will lead to beneficial social and cultural outcomes for the District's community.*')

2.6 strategic Direction 6 Natural environment values.

The Taupō district is one of few districts in New Zealand to contain rare and unique geothermal ecosystems, yet our Significant geothermal features have not been recognised in this strategic direction.

- We seek specific recognition of significant geothermal features in the preamble to the strategic direction.
- We seek an additional objective: "The protection of significant geothermal features from inappropriate land use and development which may adversely affect these unique ecosystems."

Plan Change 39 - Residential Building Coverage

We are concerned that the increase in residential building coverage from 30 to 35% will lead to increase in impermeable surfaces within the lake Taupō catchment. Maintaining permeable surface area within the Lake Taupō catchment is important to minimize the loading on stormwater systems. Particularly in a warming climate with more unpredictable rainfall patterns. We note that the maximum site coverage of 50% will not change but that this doesn't actually restrict the amount of non-permeable surfaces on a site (which could be 100%). We feel that increased monitoring will be required to ensure that the increased building footprint does not result in creep in the maximum site coverage.

- We therefore ask that solutions such as permeable driveways are promoted, and that the maximum site coverage of 50% is made enforceable by changing the wording of the maximum building coverage rule to restrict the amount of non-permeable surfacing.

Plan Change 42- General Rural & Rural Lifestyle Environments:

In general, the TCAG supports residential development close to town to minimise travel (Greenhouse gas emissions) and pressure on infrastructure including water supply in a climate stressed world. We understand this preference is in line with TDC's latest Growth Management Strategy.

Ideally rural residential areas would be adjacent to residential developments, for instance a variety of lot sizes in the Nukahau Plan Change would have provided for this. Public transport and active transport can be facilitated close to urban areas in the District.

While we support the Rural Lifestyle rezoning in principle, we are concerned that allowing further subdivision in these areas will increase carbon emissions as there will be increased travel.

Allowing increased vehicle movements from intensified Rural Lifestyle zone does not fit with Strategic Direction 1. '*Subdivision, use and development of land in the Taupo District will result in positive climate change outcomes.*'

- We ask that Rural Lifestyle subdivision be limited to the periphery of existing urban areas, not those identified in the Rural areas.

Further comment: It is likely that the provision for subdivision within a Rural Lifestyle zone but not on the periphery adjacent to the Rural zone, while commendable in terms of amenity, will be problematic as landowners will likely contest their ability to subdivide if their neighbours are able to do this on a similar lot size. I.e. within the zone itself. We foresee issues of precedent being set in these situations and further erosion of the rural amenity and increased lot numbers being enabled over time.

While the formal protection of 4ha of an SNA in the creation of a bonus lot looks good on paper, "formal protection" is merely a legal agreement.

- We suggest the wording "formal protection and enduring ecological management" would create more meaningful environmental outcomes.
- We seek a provision requiring an ecological management plan which includes consideration of weed and animal pest management. This should be submitted as part of the application for a bonus lot.
- In addition, we suggest the inclusion of a Subdivision - Significant Natural Areas section to the affect that: "Any subdivision of land in the General Rural Environment or Rural Lifestyle Environment that is located adjacent to a Significant Natural Area will include a buffer, so as not to encroach on the SNA, and allow for access to that Significant Natural area for on-going ecological management to maintain the ecological integrity of the SNA, including weed and animal pest management."

RE: 4b. Rural Environment

TCAG agrees with WRC's previous comments to the Draft DP that *'development should be situated away from natural gully systems and that gully vegetation should be managed to avoid exacerbating actual or potential erosion (and related) risks. Identification and protection of natural gullies should be mandatory for all development in the district.'*

TCAG commend the council on working with developers in urban areas and support the protection and revegetation of gullies in the district. They can, as is well understood, have multiple benefits, not least as carbon sinks, for stormwater attenuation, recreational use but also serve as invaluable ecological corridors in urban as well as rural areas.

- TCAG request consideration be given to natural gully systems in the General Rural Environment and proposed Rural Lifestyle Zone including general protection, restricted land use in close proximity to, restricted or controlled access, vegetation enhancement and management, erosion control.

Comment: We understand that identifying gullies would be possible via a GIS analysis process. This is well within the capability of Taupō District Council particularly given that there are significant LiDAR datasets currently being processed by LINZ as part of the Elevation Aotearoa programme.

Plan change 43: Taupo Industrial Lane

"We encourage caution towards proposed Plan Change 43 – Taupō Industrial Land. In particular the rezoning of the Broadlands Road West Area. This area includes potential areas of un-mapped geothermal habitat, Geothermal ecosystems represent a unique habitat type that cannot be artificially created, and ongoing development of these areas contributes to the decline of these critically endangered ecosystems. Industrial development on the edge of other geothermal areas within the Taupō District has led to damage to these areas due to dumping, vehicle access and fires.

Development of the Broadlands Road site requires conditions contributing to the restoration of the adjoining geothermal systems, in order to halt the “death by one thousand cuts” of these critically endangered ecosystems.

We ask that provisions include, but not be limited to:

- the inclusion of an ecological assessment of potential geothermal features,
- an ecological mitigation plan and
- a hydrological assessment of effects of development on groundwater recharge.

We also question the inclusion of the site at 189 Napier Road from Rural to Industrial as inconsistent with 2.4 Strategic Direction Climate Change, where there is already a large industrial area opposite this site – is this additional industrial land necessary? There is also a new industrial zone near Taupo Airport. Also, a consent for the EUL development includes this site and there is a consent notice relating to the use of this site for education. Has consideration been given to reverse sensitivity from the residential properties which will adjoin this site in the EUL development, and potential for adverse industrial effects for these new residential properties?

- TCAG ask that the Industrial Zone at 189 Napier Road be removed.

We thank TDC for the opportunity to submit and are happy to speak to our submission.

Alana Delich, on behalf Taupō Climate Action Group

Organisation:

Te Kotahitanga o Ngati Tuwharetoa

First name: George**Last name:** Asher**Postal address:****Suburb:****City:****Country:** New Zealand**Email:** geoera@xtra.co.nz**Daytime Phone:** 021 368566

- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I 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 the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

File
PDF - District Plan Submission - TKNT

Submission by Te Kotahitanga o Ngāti Tuwharetoa (TKNT) on Taupo District Council Plan Changes 38 to 43

Introduction:

TKNT was established in 2017 to receive, manage, hold and administer, and implement to implement the settlement redress on behalf of the 26 hapū of Ngāti Tūwharetoa.

TKNT is the mandated iwi authority for Ngāti Tūwharetoa to act as the representative of Ngāti Tūwharetoa in dealing with the Crown, local and regional authorities, other iwi and other external agencies. Its membership is made up of Te Ariki of Ngāti Tuwharetoa and a delegate and alternate member of each of the 26 hapū of Ngāti Tuwharetoa.

Te Poari Mahi (TPM) is the advisory Board for Te Kotahitanga of Ngāti Tuwharetoa.

This submission is made pursuant to requirements of the Resource Management Act 1991. TKNT acknowledge, however, that comments made in respect of Plan Changes 38 to 43 of the District Plan are heavily influenced by the provisions of the Ngāti Tuwharetoa Claims Settlement Act 2018 (the **Settlement Act**) and the preceding Deed of Settlement, 2017.

Of particular importance to TKNT is that the plan changes reflect the vision and values represented by **Nga Pou e Toru**, three pou or pillars that represent the aspiration of Ngāti Tuwharetoa to ensure a healthy Rohe of Ngāti Tuwharetoa (also known as the Area of Interest of Ngāti Tuwharetoa) that is capable of sustaining the well-being of the whole community.

A key intention of the Settlement Act is to enhance Ngāti Tūwharetoa capability and capacity to achieve beneficial environmental and resource management outcomes for the Taupō catchment and the Rohe of Ngāti Tuwharetoa. To achieve this outcome, it is necessary to ensure that the kawa, tikanga, values and mātauranga of Ngāti Tūwharetoa is respected within the policies and plans that shape the decisions relating to the Taupō catchment.

Te Kōpu ā Kānapanapa

The Ngāti Tūwharetoa Claims Settlement Act 2018 provides for the establishment of a statutory joint committee, **Te Kōpu ā Kānapanapa**, whose function is to:

- restore, protect and enhance the environmental, cultural and spiritual wellbeing of the Taupō catchment
- provide strategic leadership on the sustainable and integrated management of the environment in the Taupō catchment
- provide a mechanism for Ngāti Tūwharetoa to exercise mana and kaitiakitanga over the Taupō catchment in partnership with local government.

The joint committee draws membership from Te Kotahitanga o Ngāti Tūwharetoa, Waikato Regional Council and Taupō District Council.

Te Kōpu ā Kānapanapa is focussed primarily on te taiao restoration, protection, and enhancement within the catchment, however, it must also provide for the health, well-being and prosperity of all members of the community including future generations. These functions embody the intent and meaning set out within the three pillars of **Nga Pou e Toru**.

One of the functions of Te Kōpu ā Kānapanapa is to prepare and approve **Te Kaupapa Kaitiaki**, the high-level plan for the Taupo catchment. Te Kaupapa Kaitiaki gives expression to the vision, objectives, desired outcomes, values, significant issues, and other relevant matters within the Taupo catchment, all matters that Te Kōpu ā Kānapanapa must give effect to.

The statutory requirements of Te Kaupapa Kaitiaki are set out in Sections 181-182 of the Settlement Act. These sections state that, in preparing, reviewing, varying, or changing a regional policy statement, regional plan or district plan (including a proposed policy statement or plan), a local authority must **recognise and provide for** the vision, objectives, values, and desired outcomes in Te Kaupapa Kaitiaki.

RECOMMENDATION 1:

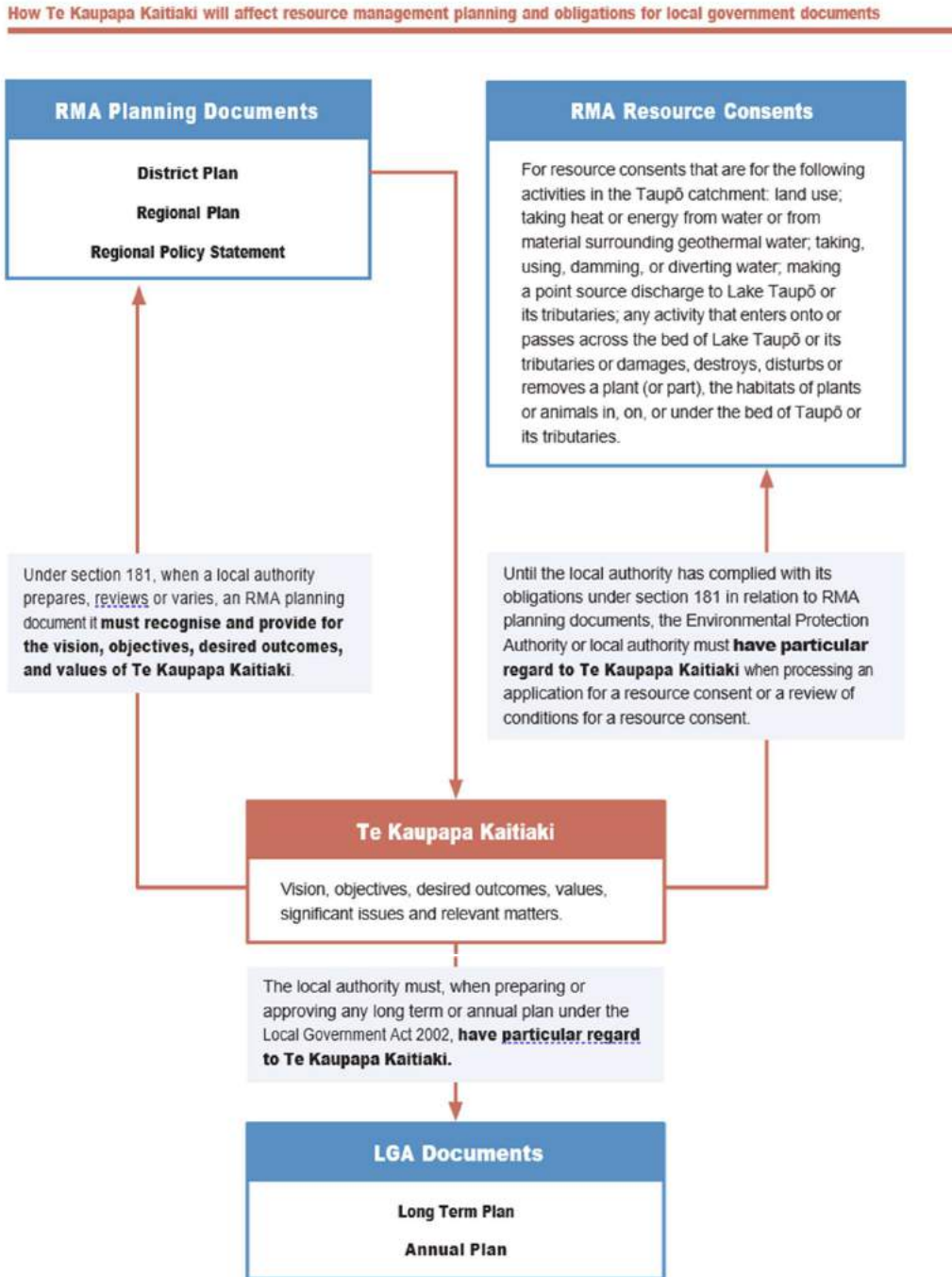
That the objectives and policies of the strategic directions and Plan Changes 38 to 43 recognise and provide for the vision, objectives, values, and desired outcomes in Te Kaupapa Kaitiaki as set out within Section 181 of the Settlement Act.

In addition, whenever a consent authority (Taupo District Council) is processing or making a decisions on an application for resource consent (including any review of the conditions of a resource consent) the consent authority must **have particular regard to** the vision, objectives, values, and desired outcomes in Te Kaupapa Kaitiaki. This applies particularly to consents for the following activities, within the Taupō catchment:

- i) using land:
- ii) taking heat or energy from water:
- iii) taking heat or energy from the material surrounding geothermal water:
- iv) taking, using, damming, or diverting water:
- v) making a point source discharge to Lake Taupō or its tributaries:
- vi) any activity that enters onto or passes across the bed of a lake or river or damages, destroys, disturbs or removes a plant (or part), the habitats of plants or animals in, on, or under the bed of Lake Taupō or its tributaries.

Figure 1(below) illustrates the significant requirements of local authorities with respect to Te Kaupapa Kaitiaki.

Figure 1(Reference – *Te Kaupapa Kaitiaki – Taupo Catchment Plan p.15*)



SUBMISSION SPECIFIC TO PLAN CHANGE 38: STRATEGIC DIRECTIONS:

CHAPTER 2

TKNT note that TDC is required under the RMA to ‘take into account’ of Te Tiriti o Waitangi. TKNT hereby clarifies its preference for the wording of legislation that ensures that local authorities are more respectful and committed to fulfilling Treaty based principles. In this regard, TKNT note that the RMA will largely continue to be applied during the transition of the ‘Reform’ while Regional Spatial Strategies (RSS) and Natural Built Environment Plans (NBE Plan) are being developed within regions. TKNT note that iwi/Maori/ hapu may be exposed to unfair risk and adversity when a local authority makes a choice to not take into account or avoid giving effect to the principles of the Treaty as the RMA Act currently allows. TKNT refer to the several cases that have been before the Waitangi Tribunal since 1992) and ask that TDC when interpreting these Treaty/Te Tiriti, principles, ensure that it fully comprehends the situations/circumstances under consideration. To this end TKNT make the following recommendations:

RECOMMENDATION 2

1. That the content and interpretation of the objectives, policies, rules and performance standards of Plan Changes 38-43 respect and reflect a genuine understanding and commitment to the principles of Te Tiriti/The Treaty of Waitangi.
2. That TDC ensure that the content and interpretation of the objectives and policies of Plan Change 38-43 reflect the new wording of the NBE and SP Acts once these are ratified by the appropriate regional authorities.

2.1 TANGATA WHENUA

TKNT generally support the overall content of **Objective 2.1.2**.

TKNT recommend that the following wording changes be made to the following policies:

RECOMMENDATION 3: TANGATA WHENUA

Recommended changes in **Red Font and strikeouts**:

Policy 2.1.3 :

Recognise and provide for the relationship of Māori/iwi/hapū and their culture and traditions with their ancestral lands, water, sites, wāhi tapu (sacred sites), and other taonga (treasures).

1. Provide for development on Māori land that enables tāngata whenua:
 - a. to **exercise their mana whakahaere and kaitiakitanga** ~~act in a way that is consistent with their~~ **kawa, tikanga and mātauranga** ~~culture and traditions~~

- b. to fulfil **their** cultural, economic and social aspirations, **rights and interests** of ~~these~~ **owners-as mana whenua**
 - c. ~~enhance their ability to exercise kaitiakitanga~~
 - 1. ~~strengthens~~ to enhance their relationships with land, water, significant sites, and wāhi tapu and taonga tuku iho
2. Recognise **and provide for the importance** of mātauranga Māori, kaitiakitanga and tikanga Māori in land use planning and decision making.
 3. Recognise and support opportunities for tāngata whenua to exercise their customary responsibilities as mana whenua
 4. **Recognise and provide for the unique role of mana whenua hapū as Kaitiaki at place of nga taonga tuku iho.**
 5. Recognise that ~~the wider constraints on the utilisation and development of Māori land~~ **has been subjected to inequitable historical constraints that unfairly limit the owners options for the utilisation and development of their lands.**
 6. **Promote** and **enable** the development of Māori Land **consistent with the vision, objectives, values and desired outcomes within Te Kaupapa Kaitiaki and** within the provisions of the plan for the purposes of fulfilling the economic and social aspirations of ~~these~~ Maori land owners.
 7. Provide opportunities for Māori involvement in decision-making and monitoring of the District Plan, resource consents, designations and heritage orders including in relation to sites of significance to Māori and issues of cultural significance.
 8. Recognise, in decision making, the importance of iwi **and/or hapū** environmental management plans in providing important guidance and direction on the sustainable use and development of the environment and natural resources.
 9. Recognise and support **kawa and** the incorporation of **tikanga and** mātauranga Māori **principles** into the **planning,** design, development and/or operation of land use activities.

RECOMMENDATION 4

That TDC agree to include additional objectives in accordance with the requirements of Te Kaupapa Kaitiaki.

2.2 FRESHWATER QUALITY / TE MANA O TE WAI

TKNT note that the objectives contained in this section do not provide explicit recognition of Te Mana o te Wai nor do they reflect the contents of Te Kaupapa Kaitiaki.

RECOMMENDATION 5

That Objective 2.2.2 contain an explicit primary objective reference as provided below.

2.2.2 Objective

That freshwater and water bodies be managed in accordance with the hierarchy and principles of Te Mana o te Wai:

1. To protect its mauri and values so that the water is safe for use for traditional medicinal purposes, for drinking, for taking kai and for swimming.
2. To protect freshwater ecosystems, indigenous species, and trout fisheries.
3. To reflect the vision and objectives of ngā hapū o Tūwharetoa as contained within Te Kaupapa Kaitiaki
4. Subdivision and land use is managed in a way that promotes the positive effects, while avoiding, remedying, or mitigating adverse effects (including cumulative effects) of that development, on the mauri, health and well-being of water bodies, freshwater ecosystems, and receiving environments within the Taupō District.

RECOMMENDATION 6

That TKNT generally support policies 2.2.3 numbers 1-6 and recommend that the following wording/changes be adopted to enhance these further.

That 2 further policies be included as submitted (Policy 2.2.3 - 7. & 8 below).

2.2.3 Policy

1. **Manage** waterbodies in a manner **that enhances the health and well-being** of tāngata whenua, ~~and~~ the wider community and future generations.
2. Decisions, policy and planning reflect an integrated land management or ki uta ki tai approach to water resource management **and** land use planning.
3. Recognise and provide for the vision, objectives, and outcomes in Te Ara Whanui o Rangitāiki (Pathways of the Rangitāiki) and Te Kaupapa Kaitiaki ~~documents~~ and to give effect to Te Ture Whaimana o Te Awa o Waikato - the Vision and Strategy for the Waikato River.
4. Recognise the benefits of subdivision, landuse and development activities which will directly contribute to the enhancement of freshwater quality.
5. Manage subdivision, use and development of land in a manner that restores, protects and enhances the mana, mauri, health and wellbeing of the District's lakes, rivers, **springs, wetlands** and all other waterways.
6. **Recognise and provide for** the relationship of tāngata whenua as mana whakahaere, kaitiaki and traditional users of waterbodies ~~is respected, enhanced and supported.~~
7. **Manage freshwater ecosystems to ensure protection of indigenous biodiversity and trout.**
8. **Recognise that freshwater bodies provide for traditional rituals and spiritual, physical and psychological well-being and sustenance.**

2.3 STRATEGIC DIRECTION: 3 - URBAN FORM AND DEVELOPMENT

2.3.2 Objectives

RECOMMENDATION 7

TKNT generally support Objectives 2.3.2

2.3.3 Policy

1. Identify and zone appropriate areas of land for urban purposes to guide the future provision of infrastructure within the Taupō District.
2. Planning and development in urban environments will positively contribute to well-functioning urban environments.
3. Subdivision, use and development of land will be consistent with TD2050 to maximise the efficient use of zoned and serviced urban land and is co-ordinated with the provision of effective infrastructure.

COMMENT

TDC is aware that Ngati Tuwharetoa land owners own a substantial area of land within the Taupo District and many of their descendants desire to maintain their turangawaewae with their whanau and ancestral lands. TKNT is concerned that TD2050 fell short of providing adequate scoping future or even identifying existing residential or kainga developments of Māori landowners. TD2050 has also promoted 'red zone' potential residential development that has failed to be realised and some may never be developed. Also, at least one substantial proposal has failed to receive due attention and development support of local authorities while long established settlements with predominantly Māori residents have failed to attract a reasonable level of infrastructure support and services.

Furthermore, since the completion of the Ngati Tuwharetoa claims settlement, additional land has been received as cultural and commercial redress. At least one significant area of cultural redress lands has the explicit sanction of the Crown and mana whenua for residential use. Other redress properties may fulfil similar uses as kainga.

RECOMMENDATION 8

In view of the reasons outlined above, TKNT does not support Policy 2.3.3 (3), particularly in the statement that, "Subdivision, use and development of land will be consistent with TD2050 to maximise the efficient use of zoned and serviced urban land"...

RECOMMENDATION 9

The following submissions are made in respect of Policy 2.3.3:

4. That the concept ‘fragmented development’ not be used to characterise developments on Māori land or to prohibit or constrain the customary rights of mana whenua in utilising their lands.
5. That ‘limiting criteria’ include explicit criteria sets that provide for adequate protection of freshwater bodies consistent with the requirements under Te Mana o te Wai and Te Kaupapa Kaitiaki.
6. That in addition to the requirement to demonstrate beneficial social and cultural outcomes, explicit consideration be provided for the desired outcomes and values within Te Kaupapa Kaitiaki.
7. That TKNT support this policy and recommend further that TDC express that the provision of Papakāinga for the occupation by mana whenua on their ancestral lands is a fundamental human right.
10. That TKNT generally support Policy 2.3.3 (10) and recommend the addition of specified limits be introduced to prevent the adverse effects of urban development on the health and well-being of te taiao, its ecosystems and to communities including iwi/hapū/whanau within the district and beyond.

2.4 STRATEGIC DIRECTION: 4 - CLIMATE CHANGE**RECOMMENDATION 10**

TKNT note that the Objective 2.4.2 covers a limited scope of domains that may be effected by climate change within the District.

TKNT recommend, that climate change domains and objectives be expanded to include protection and mitigation of the following from climate-induced changes/risks: (Note the *reference below to the concepts highlighted in 1, 2, 3 and 4.*)

1. **He Kura Taiao** – Living Treasures: Freshwater bodies, ecosystems, natural habitats, indigenous biodiversity
 - a. Explanation: Loss of these ‘treasures’ will adversely impact Māori customary practice, cultural identity, social cohesion, and well-being.
2. **Whakatipu Rawa** - Maori Enterprise: Includes all rural enterprises (forestry, agriculture, horticulture) and Māori land developments and actual and potential fishing related ventures
 - a. Explanation: Over 68% of Māori businesses are in the primary sector. Over 80% of Māori land is defined as hilly-to-mountainous and is susceptible to major erosion events such as landslides. Extreme rainfall events trigger erosion that affects a large proportion of these lands. Māori own nearly 70% of commercial forestry plantations in the district. These are vulnerable to climate extremes such as high-intensity storms, droughts and wildfires.

3. **He Oranga Tangata** – Healthy People: As noted by TDC, Māori are disproportionately affected by climate induced change and communities generally are affected.
 - a. The impacts are evidenced through a variety of well-being and health issues that may also be exacerbated by geographic location, socio-economic status, existing health conditions, poor access to health system services and an incapacity to adapt.
4. **Ahurea Māori, Tikanga Māori** – Maori culture and practices: Climate-induced changes to the natural environment in Aotearoa-NZ are expected to fundamentally alter the way Māori interact with that environment, each other, and other communities. There will be direct impact on the following:
 - a. Marae
 - b. Kainga
 - c. Access to Mahinga Kai and availability of species
 - d. Access to and significant landscapes

Reference: *He huringa āhuarangi, he huringa ao: a changing climate, a changing world*
 – Land Care Research/Te Pae o te Maramatanga - 2021)

RECOMMENDATION 11

TKNT Recommend that appropriate policies be prepared and adopted to support the new objectives in Recommendation 10 (above)

2.5 STRATEGIC DIRECTION: 5. SIGNIFICANT AND LOCAL INFRASTRUCTURE

Comment:

While infrastructure provides benefits to the social and economic wellbeing of people, communities and the nation, several aspects of infrastructure have permanently damaged and altered terrestrial, geothermal and freshwater taonga and their ecosystems. The direct and indirect social, cultural economic and spiritual impact on Ngāti Tūwharetoa hapū and whanau and other iwi within the District, has been profound and the effects of infrastructure development continue to adversely impact on hapū as kaitiaki at place and Māori landowners. (Almost all of these incidents are historically recorded and documented cases)

TKNT note, that despite the seriousness of these adverse impacts and their significant actual and potential costs to Maori/iwi/hapu/whanau, they are not referenced in the summary and there is an absence of objectives and policies to highlight and address the risks presented by modern and future infrastructure.

RECOMMENDATION 12

That additional statements, objectives and policies be included in **Section 2.5** to reflect the following:

1. A statement that acknowledges the profound adverse, direct and indirect, social, cultural, economic and spiritual impact that infrastructure (three waters networks and services, transport, communications, energy generation, transmission and distribution networks, and any other network utilities undertaken by network utility operators), has on Ngāti Tūwharetoa hapū and whanau and other iwi within the Taupo District
2. A statement that acknowledges the profound adverse impact that infrastructure has on the taiao, taonga tuku iho and the resultant significant effects that this impact has on the environmental and the social, cultural, spiritual and economic well-being of iwi/hapu/whanau and the community.

RECOMMENDATION 13

1. That the additional objective(s) be included in the sub-section to enable protection of the health and well-being of iwi/hapū/whanau Māori landowners and the community and the health and well-being of te taiao and taonga tuku iho of the Taupo District.
2. That the objectives in 1. (above) are recognised and provided for in decision-making and land use planning.
3. That the proposed Objectives 2.5.2, 1. and 4. be modified as follows:
 1. The ~~wider~~ benefits and strategic importance of nationally and regionally significant infrastructure to the District and wider, ~~including the economic, cultural and social wellbeing of people and communities and for their health and safety~~, are recognised in decision making and land use planning.
(Note that the reference to benefits is already contained in Objective 2).
 4. Local and national transport infrastructure located in the Taupō District ~~protects the health and well-being of te taiao, taonga tuku iho, tangata whenua and the community and~~ operates in a safe and effective manner.
4. That a separate policy be provided acknowledge the risks that infrastructure development and operation has on te oranga o te taiao, te oranga o nga taonga tuku iho, te oranga o te tangata and to enable their protection.
5. That policy 2.5.3 - 1. be modified as follows to reflect the concerns in the statement and the recommended objectives:
 1. Recognise and provide for the national, regional and local benefits of renewable energy generation activities and resources, and transmission activities, in relation to climate change ~~and security of supply, and social, and economic wellbeing of people and communities and for their health and safety.~~
6. That policy 2.5.3 – 4. be deleted and replaced by the following.
 4. That Local and national transport infrastructure located in the Taupō District is planned and constructed in a manner that protects the health and well-being of te taiao, taonga tuku iho, tangata whenua, the community, and operates in a safe and effective manner.
7. That an additional policy statement be included to ensure that appropriate long-term planning and funding capacity is invoked when infrastructure services are being proposed and that local authorities demonstrate that they have considered all alternative options before proposing that Māori land be used as the most suitable option or location for the construction and support of infrastructure services.
8. That local authorities ensure that Maori land is not utilised for infrastructure or related services without the consent of the landowners or their mandated representative(s).

2.6 STRATEGIC DIRECTION: 6. NATURAL ENVIRONMENT VALUES

RECOMMENDATION 14: ACKNOWLEDGMENTS

1. That TDC report the actual statistics pertaining to Māori land within the District and the amount and proportion of Māori land assigned the status of Significant Natural Areas (SNAs) under the latest 2019 proposed SNAs Policy.
2. That TDC report the amount and percentage of private lands other than Māori land, within the District, that is assigned proposed SNAs, the total area of land assigned SNAs status in DOC managed lands.
3. That TDC acknowledge the extraordinary contribution of Māori landowners and hapū (kaitiaki) to the protection of indigenous biodiversity, ecosystem services and to the general health and well-being of Te Taiao and to climate change mitigation and adaptation.

RECOMMENDATION 15

1. Note that TKNT support objectives and policies that protect, enhance and restore significant indigenous ecosystems, habitats and indigenous species from the adverse effects of inappropriate development.
2. TKNT note and acknowledge the extraordinary steps that Ngati Tuwharetoa, Māori landowners and hapū (kaitiaki) have already taken to protect significant natural landscapes, te taiao, biodiversity and precious taonga including waterbodies, prior to the existence of the Resource Management Act 1991 (RMA). Furthermore, these unheralded contributions continue to be of immeasurable benefit for environmental and biodiversity protection and in the creation of a raft of substantial ecosystem services that have been activated throughout the district over many decades. TKNT note that these services have never been adequately evaluated. Furthermore, the land owners who created them have never been rewarded or considered for reward despite their continued, important role in biodiversity enhancement and climate change adaptation and mitigation.
3. TKNT is deeply concerned that the process currently adopted to determine and assign **Significant Natural Areas (SNAs)** is highly objectionable and contradicts the core values and principles of Ngati Tuwharetoa kawa, tikanga and mātauranga. In this regard, the process of identification and assignment has been imposed by force of legislation and without proper consultation processes. Furthermore, the process of assignment fails to provide Māori landowners with equitable choice or capacity to fully evaluate and determine the nature of their relationship and their culture and traditions with their ancestral lands and wāhi tapu and taonga tuku iho.
4. That TKNT support without reservation, the position of Ngati Tuwharetoa landowners and hapū who oppose directly the assignment (proposed or actual) of **Significant Natural Areas (SNAs)** on their lands.
5. TKNT recommend that a Prohibition (or RAHUI) be declared over Maori owned lands to prevent them from being assigned as SNAs without the express consent of the landowners or their mandated representatives, obtained at a properly notified and constituted meeting of the owners.
6. TKNT recommend that TDC, the Crown and appropriate regional authorities confirm acceptance of a Moratorium on SNAs as explained above and invite Māori landowners and Hapu to discuss and agree a fair and equitable process and agenda to re-engage in discussions on Natural Environmental Values.
7. TKNT recommend that these ecosystem services produced by Māori land owners are fully evaluated and a system of rewards is developed to recognise the contribution of the landowners who deliver these services.

AN EXAMPLE OF EARLY LEADERSHIP IN ENVIRONMENTAL STEWARDSHIP – LAKE TAUPO AND ROTOAIRA FOREST TRUSTS.

Lake Taupo Forest (LTF) was established in 1969 and Lake Rotoāira Forest (LRF) in the early 1970s. The total area of both forests was over 48,000 hectares. The Crown (lessee) and Ngati Tuwharetoa landowners (lessor) agreed to prohibit the planting of 28% of LTF and 42% of LRF. These substantial areas represented a significant opportunity cost, however, this outcome was driven by the commitment of the Ariki (Paramount Chief), kaumatua, the owners and hapū leaders through their unconditional commitment to uphold their kawa, tikanga and mātauranga. In the case of Lake Rotoaira, a 600 metre continuous, ‘no plant zone’ was established around its foreshore to enable protection for its waters and its mauri. This has been maintained intact since the initial plantings in 1971. By far, the largest proportion of the set-aside, protected areas were to maintain the ora (well-being) of all freshwater bodies, their ecosystems, habitats, indigenous species and trout. Some riparian ‘protection strips’ exceeded 500 metres in width to ensure that these waterways were fully protected from runoff, siltation, erosion and physical damage. A much smaller proportion of land within the forests was set aside to protect wāhi tapu, sites and landscapes of special importance and related taonga tuku iho (indigenous forests, mahinga kai, kainga settlements).

The obligation to ensure the health and well-being of the land and waters (manāki whenua, manāki wai Māori) and to secure their relationship with their whenua was the first priority of the landowners. Only after this was accomplished, were they comfortable to turn their attention to developing a world class commercial forestry venture. These forests are unique in NZ and globally insofar as they are characterised as multi-purpose forests that demonstrate deliberately designed attributes of water management, climate change mitigation and adaptation, cultural spiritual and social and environmental outcomes as well as fulfilling highly successful commercial objectives. Achieving these multiple goals for thousands of owners in over 140 separate blocks of privately owned Māori land may appear to many to be a formidable challenge, however, its success was in no small way attributed to insightful leadership and an adherence to Ngati Tuwharetoa kawa, tikanga and mātauranga.

SUBMISSION SPECIFIC TO PAPA KĀINGA - PLAN CHANGE 42 – THE GENERAL RURAL AND RURAL LIFESTYLE ENVIRONMENTS.

RECOMMENDATION 16

1. That TKNT support the deletion of the previous definition in the Taupo District Plan for Papakāinga and support the new definition of Papakāinga.
2. That TKNT support the proposal to split the rural environment into two zones, namely the General Rural Environment and the Rural Lifestyle Environment.
3. That TKNT generally support the Proposed Objectives and the Proposed Policy.
4. That TKNT generally commend the progress that has been made by TDC in developing the rural rules affecting Papakāinga, however, TKNT note to TDC that it is in the early stages of developing its kainga programme including Papakāinga and recommends that TKNT, prospective home owners' and TDC hold further discussions prior to the finalisation of detailed rules for Papakāinga.
5. That TKNT note that innovative Papakāinga performance standards are being proposed and implemented in many local authorities in NZ that are not yet available under the proposed TDC performance standards.
6. That in view of its being in the early stages of developing its kainga programme, including Papakāinga, TKNT recommend that prospective home owners' and TDC hold further discussions prior to the finalisation of detailed performance standards for Papakāinga.
7. That TKNT oppose the stringent performance standards proposed for maximum building coverage and recommend that it be increased for Papakāinga.
8. That TKNT oppose the proposed minimum building setbacks of 15m and recommend that consideration be given for prospective Papakāinga owners to reduce their requirements for minimum building setback.
9. TKNT commend TDC for the progressive changes it has made to accommodate Papakāinga in the Taupo District.

George Asher
Te Poari Mahi
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First name: Hayley
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 Suburb:
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 Country: New Zealand
 Email: h.stronge@harrisonrierson.com

Daytime Phone:

I could

I could not

Gain an advantage in trade competition through this submission

I am

I am not

- a. adversely affects the environment, and
- b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Original Submitter: #29 Megan Kettle (Unknown, New Zealand, Unknown)

Original Point: #29.3 2.3.2 Objectives

Points: FS211.1

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Oppose

The new Strategic Directions chapter covers Urban Form and Development in section 2.3 and Natural Values and Landscapes in section 2.6 and the objectives and policies in the Strategic Directions Chapter (and indeed the whole district plan) need to be read together "as a whole" rather than having to qualify each development oriented objective and policy with environmental qualifiers.

In this case, if there was to be an amendment relating to significant geothermal features, then it should be in section 2.6 alongside other "natural values" matters. It is not appropriate in section 2.3.

Notwithstanding the above point, Mercury supports the recognition of significant geothermal features and geothermal vegetation. However, Mercury seeks to ensure that the use and development of infrastructure of REG's activities is provided for in and around significant geothermal features, in order to support these activities that help to avoid climate change. Absolute protection is not always possible. The amended objective fails to recognise that geothermal electricity generation - which is an important form of renewable electricity generation (REG) activities - have a functional and operational need to locate in and around significant geothermal features.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Disallow

Disallow - the original submission to include new objective 2.3.2.1. See reasons provided.

Original Submitter: #29 Megan Kettle (Unknown, New Zealand, Unknown)

Original Point: #29.4 2.3.2 Objectives

Points: FS211.2

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Support in part

Mercury supports this objective if it is amended to refer to "urban infrastructure" and ensures it does not refer to just "infrastructure" such as Renewable Electricity Generation facilities and the:

Mercury suggests that this objective is amended to read:

Ensure that building, road and other infrastructure developments are directed away from geothermal hazards.

Some infrastructure and development, such as geothermal electricity development and associated pipelines, has a functional and operational need to locate in and around geothermal areas which often are deemed hazard areas.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

Allow in part - this original submission which suggests a new bullet point to Objective 2.3.2(1). See reasons provided

Original Submitter: #29 Megan Kettle (Unknown, New Zealand, Unknown)

Original Point: #29.7 2.3.3 Policy

Points: FS211.3

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Mercury supports this amendment to include "current and future" risks to life, property and the environment, which enables consideration of climate change at the policy stage.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

Allow - the original submission to amend the wording of 2.3.3.11. See reasons provided.

Original Submitter: #29 Megan Kettle (Unknown, New Zealand, Unknown)

Original Point: #29.8 2.3.3 Policy

Points: FS211.4

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Oppose in part:

Mercury is mindful that REG activities will be considered primarily under the objectives and policies in section 2.5 (infrastructure), more so than the objectives and policies in this section (urban form and development). However, to avoid any possible application of this "void" policy to REG activities, Mercury requests that, if it is accepted at all, that it is amended to read:

Ensure the location of infrastructure with a functional or operational need for a specific location, avoid new development and subdivision of areas in close proximity to Significant Geothermal Features as mapped in the Waikato Regional Plan.

The above wording is less absolute. The need for less absolute wording is important: Some infrastructure and development, such as geothermal electricity development and associated pipelines, has a functional and operational need to locate in and around geothermal areas which often are deemed hazard areas.

Mercury notes that REG activities assist towards NZ meeting its climate change obligations.

Mercury seeks to ensure that REG activities and infrastructure are not included in this policy.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Disallow

Disallow - the original submission to include new policy in 2.3.3. See reasons provided.

Original Submitter: #29 Megan Kettle (Unknown, New Zealand, Unknown)

Original Point: #29.10 2.5 Strategic Direction 5 Significant and Local Infrastructure

Points: FS211.5

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Mercury supports the correction as Taupo District currently provides up to 27% of New Zealand's electricity supply through its 20 renewable electricity power stations. The additional wording however should highlight not only that REG activities are locally, regionally, and nationally important infrastructure, but also that REG contributes to positive climate change outcomes and should be given priority (refer Strategic Direction 4).

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

Allow - Strategic Direction 2.5. Change the percentage from 20% to 27%.

Original Submitter: #29 Megan Kettle (Unknown, New Zealand, Unknown)

Original Point: #29.11 2.6 Strategic Direction 6 Natural Environment Values

Points: FS211.6

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Oppose in part.

Mercury supports the recognition of significant geothermal vegetation in the Taupo District Plan.

However, Mercury seeks to ensure that REG activities and infrastructure can be provided for within close proximity to geothermal areas to access and provide renewable electricity for the nation. WRC's proposed policy "to ensure their protection" fails to recognise and enable REG activities and infrastructure locating in geothermal areas where there is a functional and operational need to do so.

The WRPS does not specifically define SNA's rather it uses the term "significant indigenous vegetation and significant habitat of indigenous fauna" and this WRPS definition is not an appropriate foundation for mapping all geothermal areas.

Mercury considers that this is an example of natural values being protected ahead of climate change and that it is important to recognise that rather than protecting specific environments that protection of the environment in aggregate should be recognised and provided for. The reduction of GHG through use and development of REG's will be important for indigenous biodiversity in the future.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Disallow

Disallow in part - Strategic Direction 2.6. Disallow original submission point to include new policy 2.6.3. See reasons provided.

Original Submitter: #62 Alana Delich (72 Hinemoa Avenue, Taupo 3330, Taupo, New Zealand, 3330)

Original Point: #62.6 Plan Change 43 - Taupo Industrial Zone

Points: FS211.7

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Oppose in part.

Mercury notes that this relief was incorrectly coded in the Summary of Submissions to Plan Change 38 - Strategic Directions. This relief is actually specific to the Industrial re-zoning in Plan Change 43 - Taupo Industrial Land.

Mercury supports the recognition of geothermal vegetation and geothermal areas. However, Mercury needs to have continued vehicle access to monitor, develop and use REG activities and infrastructure in geothermal areas to provide renewable electricity.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Disallow

Disallow - The original submission point refers to Strategic Direction 2.2 and 2.3. See reasons provided.

Original Submitter: #89 Ashley Sycamore (Private Bag 3072, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #89.1 Plan Change 38 - Strategic Directions

Points: FS211.8

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Mercury considers that the final form of the NPS-B when it is eventually gazetted may be quite different to the exposure draft of the NPS-B which was the subject of a large number of submissions. Mercury considers therefore that it is not appropriate to pre-empt possible outcomes of the NPS-B prior to its gazettal and that any update to the Strategic Directions chapter must be first subject to a public process.

Mercury supports the enhancement and regeneration of indigenous biodiversity in NZ. Long term success of biodiversity is reliant upon the reduction of greenhouse gases. Mercury seeks to ensure any amendments to plan change 38 will provide for the use, development and maintenance of infrastructure for renewable electricity generation to be able to operate and create renewable electricity.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Disallow

Disallow - the original submission point on Strategic Directions 2.0 - Please refer to the reasons provided.

Original Submitter: #89 Ashley Sycamore (Private Bag 3072, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #89.2 Plan Change 38 - Strategic Directions

Points: FS211.9

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Oppose

Mercury considers any additional objectives and/or policies or definitions in relation to biodiversity should be subject to a public process and/or further. Furthermore, Mercury considers that there could be unintended consequences if amendments are made to include objectives and/or policies or definitions in relation to biodiversity.

Mercury supports the enhancement and regeneration of indigenous biodiversity in NZ. Long term success of biodiversity is reliant upon the reduction of greenhouse gases. Mercury seeks to ensure any amendments to plan change 38 will provide for the use, development and maintenance of infrastructure for renewable electricity generation to be able to operate and create renewable electricity.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Disallow

Disallow - original submission point relating to chapter 2 Natural Environmental Values. See reasons provided.

Original Submitter: #91 Colin Guyton (Unknown, New Zealand, Unknown)

Original Point: #91.8 2.5 Strategic Direction 5 Significant and Local Infrastructure

Points: FS211.10

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Mercury opposes the addition of this policy.

Reverse sensitivity effects on rural land use activities is already addressed in the General Rural and Rural Lifestyle Environments Chapter (Plan Change 43) and therefore not needed in the Strategic Direction Chapter (Plan Change 38).

Mercury is also concerned that the scope of the proposed objective is too narrow and would need to include 'consented activities' which have yet to be constructed. In Mercury's original submission (0568) on plan change 42, Mercury seeks to ensure that the words 'lawfully established and or consented activities' are included.

Mercury opposes this policy and seeks to amend objective 36.2.5 in plan change 42 which addresses reverse sensitivity appropriately.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Disallow

Disallow - The original submission refers to strategic direction 5 and includes new policy 2.5.3.6. See reasons provided.

Original Submitter: #114 Alana Delich (72 Hinemoa Avenue, Taupo, New Zealand, 3330)

Original Point: #114.1.2.4.2 Objective

Points: FS211.11

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Support in part

Mercury supports the inclusion of climate change as a strategic direction.

In addition, Mercury requests an objective to reduce greenhouse gases (by increasing REG). Proposed wording is: **E.g. An increase in the amount of electricity generated from renewable sources within the Taupo District to assist with the decarbonisation of the economy**

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

Allow with amendment - The original submission suggests an amendment to Objective 2.4.2.1. Mercury seeks a new objective also. See reasons and explanation provided.

Original Submitter: #114 Alana Delich (72 Hinemoa Avenue, Taupo, New Zealand, 3330)

Original Point: #114.7 2.6 Strategic Direction 6 Natural Environment Values

Points: FS211.12

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Mercury supports the recognition of significant geothermal features in the Strategic Directions.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

Allow - Strategic Direction 2.6 suggested new policy. See reasons provided.

Original Submitter: #115 George Asher (Unknown, New Zealand, Unknown)

Original Point: #115.15 Plan Change 38 - Strategic Directions

Points: FS211.13

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Mercury support MKNT submission seeking that Te Kaupapa Kaiitiaki should be recognised and provide for.

Te Kaupapa Kaiitiaki is a high-level plan for the Taupo catchment. Its purpose is to identify the significant issues, values, vision, objectives and outcomes.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

Original Submitter: #16 Jo Horrocks (Unknown, New Zealand, Unknown)
Original Point: #16.1 Plan Change 41 - Removal of Fault lines

Points: FS211.14

Do you support or oppose the original submission point/submission?
Please state the reasons for your support/opposition:

Oppose

Oppose

Mercury supports the Council approach of relying on the Building Act as the primary mechanism for ensuring that the risks posed to buildings from potential fault lines are mitigated.

Mercury opposes the re-introduction of the discretionary activity rules (4a.10) without having the opportunity to review the fault line overlay on the planning maps from which the 30m setback would be measured.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:
 Disallow

Disallow - 4a.10. See reasons provided

Original Submitter: #16 Jo Horrocks (Unknown, New Zealand, Unknown)
Original Point: #16.2 Plan Change 41 - Removal of Fault lines

Points: FS211.15

Do you support or oppose the original submission point/submission?
Please state the reasons for your support/opposition:

Oppose

Mercury supports the Council removing the "out of date" fault lines shown on the operative District Plan planning maps.

While Mercury is supportive of more accurate fault line information being made available, if this is to be the basis of regulation such as a setback rule in the District Plan, this should be subject to a public process.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:
 Disallow

Disallow - 4a.10. See reasons provided

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.22 Plan Change 41 - Removal of Fault lines

Points: FS211.16

Do you support or oppose the original submission point/submission?
Please state the reasons for your support/opposition:

Support

Support

Mercury supports the Council approach of relying on the Building Act as the primary mechanism for ensuring that the risks posed to buildings from potential fault lines are mitigated.

Mercury agrees with Contact Energy relief that PC41 be adopted as notified.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:
 Allow

Allow - original submission point on 4a.10. See reasons provided.

Original Submitter: #23 Tony Michelle (PO Box 2096, Wellington, 6140, Wellington, New Zealand, 6140)
Original Point: #23.4

Points: FS211.17

Do you support or oppose the original submission point/submission?
Please state the reasons for your support/opposition:

Support

Support

Mercury's original submission requested an amendment to the definition of "Rural Industry" to delete the reference to geothermal/electricity generation, as follows:

"An activity that directly supports, services or is dependent on primary production and has a locational need to be within the General Rural Environment (rather than an urban environment). These activities include, but are not limited to, forestry, agriculture, and dairy farming ~~and geothermal/electricity generation.~~"

Mercury is equally satisfied with the amendment proposed by this submitter which it agrees aligns with the National Planning Standards.

The key point from Mercury's perspective is that the term 'geothermal / electricity generation' is deleted (and is covered by a separate proposed definition for 'Renewable Electricity Generation').

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:
 Allow

Allow - original submission on section 10 definitions. See reasons provided.

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)
Original Point: #26.3 Plan Change 38 - Strategic Directions

Points: FS211.18

Do you support or oppose the original submission point/submission?
Please state the reasons for your support/opposition:

Support

Support

Mercury's original submission requested an amendment to the definition of "Rural Industry" to delete the reference to geothermal/electricity generation, as follows:

"An activity that directly supports, services or is dependent on primary production and has a locational need to be within the General Rural Environment (rather than an urban environment). These activities include, but are not limited to, forestry, agriculture, and dairy farming ~~and geothermal/electricity generation.~~"

Mercury is equally satisfied with the amendment proposed by this submitter which it agrees aligns with the National Planning Standards.

The key point from Mercury's perspective is that the term 'geothermal / electricity generation' is deleted (and is covered by a separate proposed definition for 'Renewable Electricity Generation').

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:
 Allow

Allow - original submission on Section 10 Definitions. See reasons provided.

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)
Original Point: #26.20 Objective 3b.2.1 Enable Primary Production

Points: FS211.19

Do you support or oppose the original submission point/submission?
Please state the reasons for your support/opposition:

Support

Mercury supports the proposed objective as it enables 'other compatible activities that have a functional and operational need to be in a rural environment', such as Renewable Electricity Generation.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:
 Allow

Allow - the original submissions was to include a new objective, for 3b.2.1. See reasons provided.

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)
Original Point: #26.29 Policy 3b.2.13 Avoiding reverse sensitivity

Points: FS211.20

Do you support or oppose the original submission point/submission?
Please state the reasons for your support/opposition:

Support

Support in part

Mercury supports a "reverse sensitivity" policy and also seeks amendments to policy 3b.2.13 (ref: OS #68).andnbsp;

Mercury notes that this submitter's requested wording goes some way to addressing the issue of "reverse sensitivity" but is deficient in that it only refers to reverse sensitivity in relation to primary production activities and not 'on permitted, lawfully established and/or consented neighbouring activities' which in Mercury's case, may be one of its renewable electricity generation activities.andnbsp;Mercury opposes the limitation of "reverse sensitivity" effects to on primary production activities only.andnbsp;

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:
 Allow

Allow in part - the original submission amends and replaces policy 3b.2.13. See reasons provided.

Original Submitter: #35 Patrick Edwards (PO Box 740, Taupo, New Zealand, 3351)
Original Point: #35.9 Policy 3b.2.13 Avoiding reverse sensitivity

Points: FS211.21

Do you support or oppose the original submission point/submission?
Please state the reasons for your support/opposition:
 Support

Support in part

Mercury supports a "reverse sensitivity" policy and also seeks amendments to policy 3b.2.13 (ref: 05 #68).

Mercury supports a change to this policy, however, opposes the wording being limited to consideration of "reverse sensitivity" effects to just "lawfully established activities". Mercury considers the policy should include 'on permitted, lawfully established and/or consented neighbouring activities' which in Mercury's case, may be one of its renewable electricity generation activities.

Do you seek that council allow/disallow the submission point?
Please specify the provision or part of the provision that you would like allowed or disallowed:
 Allow

Allow in part - the original submission suggests a new policy 3b.2.13. See reasons provided.

Original Submitter: #71 Kendall Goode (30 Tongariro Street, Taupo, New Zealand, 3330)
Original Point: #71.1 4b.2.6 Minimum building setbacks

Points: FS211.22

Do you support or oppose the original submission point/submission?
Please state the reasons for your support/opposition:
 Support

Support in part.

Mercury supports the Foreshore Protection Area and the Operative District Plan 5m minimum building setback rule being included in the proposed Rural General and Rural Lifestyle Environments.

Mercury is however concerned that the proposed rule is not clear and requires clarification.

The Operative District Plan and proposed minimum building setback rule in Plan Change 42 provided specific provisions for REG. These include:

- On front boundary setback for Renewable Electricity Generation activities where they extend over a road.
- On boundary setback for buildings and activities associated with Renewable Generations Activities within Electricity Generation Core Sites
- On boundary setbacks for buildings and activities associated with Renewable Generations Activities within Geothermal Area in Section O.

Mercury seeks the rule be amended to make it clear that the 5m minimum building setback from the Foreshore Protection Area Boundary does not apply to Renewable Electricity Generation activities that have a functional and operational need to be located within the foreshore area.

Do you seek that council allow/disallow the submission point?
Please specify the provision or part of the provision that you would like allowed or disallowed:
 Allow

Allow in part - the original submission refers to adding 4b.2.6 v. See reasons provided.

Original Submitter: #71 Kendall Goode (30 Tongariro Street, Taupo, New Zealand, 3330)
Original Point: #71.2 4b.4.7 Minimum building setbacks

Points: FS211.23

Do you support or oppose the original submission point/submission?
Please state the reasons for your support/opposition:
 Support

Support in part

Mercury considers the minimum setback rule should be consistent between the Rural General and Rural Lifestyle Environments and accordingly seeks the same relief as set out in respect of point 71.1.

Do you seek that council allow/disallow the submission point?
Please specify the provision or part of the provision that you would like allowed or disallowed:
 Allow

Allow in part - the original submission refers to 4b.4.7 v. See reasons provided.

Original Submitter: #78 Dominic Adams (, New Zealand)
Original Point: #78.3 Amendments to the Definitions of the Taupō District Plan Section 10

Points: FS211.24

Do you support or oppose the original submission point/submission?
Please state the reasons for your support/opposition:
 Support

Mercury's primary submission requested an amendment to the definition of "Rural Industry" to delete the reference to geothermal/electricity generation, as follows:

"An activity that directly supports, services or is dependent on primary production and has a locational need to be within the General Rural Environment (rather than an urban environment). These activities include, but are not limited to, forestry, agriculture, and dairy farming and geothermal/electricity generation."

Mercury is equally satisfied with the amendment proposed by this submitter which it agrees aligns with the National Planning Standards.

The key point from Mercury's perspective is that the term 'geothermal / electricity generation' is deleted (and is covered by a separate proposed definition for 'Renewable Electricity Generation').

Do you seek that council allow/disallow the submission point?
Please specify the provision or part of the provision that you would like allowed or disallowed:
 Allow

Allow - the original submission refers to section 10 definitions. See reasons provided.

Original Submitter: #79 Cathiona Eagles ()
Original Point: #79.11 Amendments to the Definitions of the Taupō District Plan Section 10

Points: FS211.25

Do you support or oppose the original submission point/submission?
Please state the reasons for your support/opposition:
 Support

Support in part.

Mercury's original submission requested an amendment to the definition of "Rural Industry" to delete the reference to geothermal/electricity generation, as follows:

"An activity that directly supports, services or is dependent on primary production and has a locational need to be within the General Rural Environment (rather than an urban environment). These activities include, but are not limited to, forestry, agriculture, and dairy farming and geothermal/electricity generation."

Renewable Electricity Generation are not simply a "Rural Industry" because they are located in a Rural Environment, they are REG activities located in the Rural Environment.

Mercury is equally satisfied with the amendment proposed by other submitters (NZAAA, Horticulture New Zealand and Balance Agri-Nutrients) which it agrees aligns with the National Planning Standards.

The key point from Mercury's perspective is that the term 'geothermal / electricity generation' is deleted (and is covered by a separate proposed definition for 'Renewable Electricity Generation').

Do you seek that council allow/disallow the submission point?
Please specify the provision or part of the provision that you would like allowed or disallowed:
 Allow

Allow in part - the original submission refers to Section 10 Definitions. See reasons provided.

Original Submitter: #110 Trudi Burney (31 Giberthorpes Road, Islington, Christchurch, New Zealand, 8042)
Original Point: #110.8 Plan Change 42 - General Rural and Rural Lifestyle Environments

Points: FS211.26

Do you support or oppose the original submission point/submission?
Please state the reasons for your support/opposition:
 Support

Mercury supports the alignment of the definitions with the National Planning Standards, including 'rural industry'. In respect of 'rural industry' the key point from Mercury's perspective is that the term 'geothermal / electricity generation' is deleted (and is covered by a separate proposed definition for 'Renewable Electricity Generation').

Do you seek that council allow/disallow the submission point?
Please specify the provision or part of the provision that you would like allowed or disallowed:
 Allow

Allow - the original submission refers to section 10 Definitions. See reasons provided.

Original Submitter: #110 Trudi Burney (31 Giberthorpes Road, Islington, Christchurch, New Zealand, 8042)
Original Point: #110.13 3b Rural Environment Chapter

Points: FS211.27

Do you support or oppose the original submission point/submission?
Please state the reasons for your support/opposition:
 Support

Mercury wishes to provide further submissions on #110 (Transpower New Zealand) which are not included in the Council summary of submissions. Mercury's further submissions relate to plan changes 38 & 42. Please note that Mercury have provided the further submission points below against #110.13, as there is no other place online to record points that do not have a specific number (and #110.13 is considered the best fit for recording these further submission points against). Please refer to the attached supporting documentation for full explanation.

Submission Summary

Introduction: Mercury supports the development of an energy / infrastructure chapter to give effect to the NPS-ET. This should however not be limited to NPS-ET but also include Energy and NPS-REG.

Overview - Within the Taupo District Mercury's REG power stations connect with the national grid. Ensuring the District Plan recognises and provides for the operation, maintenance, upgrade and development of the electricity transmission network, as well as REG, is of critical importance.

Transpower's Feedback on Plan Change 38 - 43 - Mercury supports the development of an Energy / Infrastructure chapter to give effect to the NPSET. This should however not be limited to NPSET but also include REG and give effect to the NPS-REG. Mercury supports Transpower's requests for consistent plan wide recognition and provisions specific to the National Grid to give effect to the NPSET.

Specific Comments - Mercury supports Transpower's requests for consistent plan wide recognition and provisions specific to the National Grid to give effect to the NPSET.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

Allow - See full explanation in attached supporting documentation.

Original Submitter: #114 Alana Delich (72 Hinemoa Avenue, Taupo, New Zealand, 3330)

Original Point: #114.8 Plan Change 39 - Building Coverage - Residential Environment

Points: 211.28;FS211.29;FS211.30;FS211.31;FS211.32

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Support and Oppose

Note duplication in summary of submission.

As set out above in respect of submission point 114.7, Mercury supports the recognition of significant geothermal features in the Strategic Directions.

Mercury opposes the additional objective seeking "protection" without providing for appropriate REG activities in significant geothermal areas.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Disallow

Disallow - Strategic Direction 2.6 - New objective. See reasons provided.

Attached Documents

File
Final - Further Submissions on Taupo District Plan Changes 38-41 and 42 - Mercury 05-04-2023



**FURTHER SUBMISSIONS ON TAUPO DISTRICT PLAN
PROPOSED PLAN CHANGES
38 - Strategic Directions
41 - Removal of Fault Lines
42 - Rural General and Rural Lifestyle Environments**

Clause 8 of First Schedule, Resource Management Act 1991

Taupo District Council
Private Bag 2005
Taupo Mail Centre 3352

Further Submitter Details

Name of submitter: **Mercury NZ Limited (“Mercury”)**
Contact person: Hayley Stronge
Address for service: c/- Harrison Grierson
Contact phone number: 07 925 0009
Email: H.Stronge@harrisingrierson.com

About Mercury

Mercury is a vertically integrated generator and retailer of electricity throughout New Zealand. 100% of our electricity is generated from renewable energy sources – covering hydro, geothermal and wind generation. Mercury operates the Waikato Hydro Scheme (“WHS”) consisting of the Taupō Control Gates, eight dams and nine power stations on the Waikato River, with a total electricity generating capacity of approximately 1050MW. Mercury also operates five geothermal power stations within the Taupō volcanic zone, four of which are located within the Taupō District, with a total net capacity of approximately 370 MW.

Further Submissions

Mercury lodged an original submission on Plan Changes 38 and 42 (ref: OS #68).

As the owner and/or operator of renewable electricity generation assets within the Taupō District, Mercury is a person who has an interest in the proposal that is greater than the interest of the public generally.

Mercury’s further submissions on Plan Changes 38, 41 and 42 are set out in attached [Tables 1 to 3](#) respectively. A further submission in support of Transpower (OS #110) in respect of both Plan Change 38 & 42 is set out in [Table 4](#).

Mercury **wishes to be heard** in support of its further submissions. If others make a similar submission, Mercury will consider presenting a joint case with them at the hearing.

A copy of this submission has been served on the original submitters, as set out in [Table 5](#).

pp: 

Shirley Chamberlin
On behalf of Mercury NZ Limited
Date: 6 April 2023



Table 1: Plan Change 38 – Strategic Directions

Plan Change Number	Submitter Name / Submission number	Submission point number	Support / Oppose	Reasons	Allow / Disallow	Do you wish all or part of the point to be allowed or disallowed? Please specify if part of the point.
38	Waikato Regional Council 29	29.3	Oppose	<p>The new Strategic Directions chapter covers Urban Form and Development in section 2.3 and Natural Values and Landscapes in section 2.6. The objectives and policies in the Strategic Directions Chapter (and indeed the whole district plan) need to be read together “as a whole” rather than having to qualify each development oriented objective and policy with environmental qualifiers.</p> <p>In this case, if there was to be an amendment relating to significant geothermal features, then it should be in section 2.6 alongside other “natural values” matters. It is not appropriate in section 2.3.</p> <p>Notwithstanding the above point, Mercury supports the recognition of significant geothermal features and geothermal vegetation. However, Mercury seeks to ensure that the use and development of infrastructure of REG's activities is provided for in and around significant geothermal features, in order to support these activities that help to avoid climate change. Absolute protection is not always possible. This submission point fails to recognise that geothermal electricity generation - which is an important form of renewable electricity generation (REG) activities - have a functional and operational need to locate in and around significant geothermal features.</p>	Disallow	The entire submission point.
38	Waikato Regional Council 29	29.4	Oppose	<p>Mercury supports this objective if it is amended to refer to ‘urban infrastructure’ and ensures it does not refer to just ‘infrastructure’ such as Renewable Electricity Generation facilities.</p> <p>Mercury suggests that this objective is amended to read:</p> <p><u>Ensure that building, roading and urban infrastructure developments are directed away from geothermal hazards.</u></p> <p>Some infrastructure and development, such as geothermal electricity development and associated pipelines, has a functional and operational need to locate in and around geothermal areas which often are deemed hazard areas.</p>	Disallow	Disallow the submission point, unless it is amended to refer to ‘ urban infrastructure ’.
38	Waikato Regional Council 29	29.7	Support	Mercury supports this submission point to amend policy 2.3.3.11 to include ‘current and future’ risks to life, property and the environment, which enables consideration of climate change at the policy stage.	Allow	The entire submission point.
38	Waikato Regional Council 29	29.8	Oppose	<p>Mercury is mindful that REG activities will be considered primarily under the objectives and policies in section 2.5 (infrastructure), more so than the objectives and policies in this section (urban form and development). However, to avoid any possible application of the “avoid” policy (in this submission point) to REG activities, Mercury requests that, if it is accepted at all, that it is proposed to read:</p> <p><u>Except in relation to infrastructure with a functional or operational need for a specific location, avoid new development and subdivision of areas in close proximity to Significant Geothermal Features as mapped in the Waikato Regional Plan.</u></p> <p>The above wording is less absolute. The need for less absolute wording is important. Some infrastructure and development, such as geothermal electricity development and associated pipelines, has a functional and operational need to locate in and around geothermal areas which often are deemed hazard areas.</p> <p>Mercury notes that REG activities assist towards NZ meeting its climate change obligations.</p> <p>Mercury seeks to ensure that REG activities and infrastructure are not included in this policy.</p>	Disallow	The entire submission point.
38	Waikato Regional Council 29	29.10	Support	Mercury supports the correction as Taupo District currently provides up to 27% of New Zealand’s electricity supply through its 20 renewable electricity power stations. The additional wording however should highlight not only that REG activities are locally, <u>regionally</u> and nationally important infrastructure, but also that REG contributes to positive climate change outcomes and should be given priority (refer Strategic Direction 4).	Allow	The entire submission point.

38	Waikato Regional Council 29	29.11	Oppose	<p>Mercury supports the recognition of significant geothermal vegetation in the Taupo District Plan.</p> <p>However, Mercury seeks to ensure that REG activities and infrastructure can be provided for within close proximity to geothermal areas to access and provide renewable electricity for the nation. WRC's proposed policy "to ensure their protection" fails to recognise and enable REG activities and infrastructure locating in geothermal areas where there is a functional and operational need to do so.</p> <p>The WRPS does not specifically define SNA's rather it uses the term "Significant indigenous vegetation and significant habitat of indigenous fauna". This WRPS definition is not an appropriate foundation for mapping all geothermal areas.</p> <p>Mercury considers that this is an example of natural values being protected ahead of climate change and that it is important to recognise that rather than protecting specific environments that protection of the environment in aggregate should be recognised and provided for. The reduction of GHG through use and development of REG's will be important for indigenous biodiversity in the future.</p>	Disallow	<p>Disallow the submission where it proposes a new policy in 2.6.3 which states: <u>Map as SNAs all geothermal areas that meet the Waikato Regional Policy Statement definition of SNA, and ensure their protection.</u></p>
38	Alana Delich 62	62.2	Oppose	<p>Mercury notes that this relief was incorrectly coded in the Summary of Submissions to Plan Change 38 – Strategic Directions. This relief is actually specific to the Industrial re-zoning in Plan Change 43 – Taupo Industrial Land.</p> <p>Mercury supports the recognition of geothermal vegetation and geothermal areas. However, Mercury needs to have continued vehicle access to monitor, develop and use REG activities and infrastructure in geothermal areas to provide renewable electricity.</p>	Disallow	The entire submission point.
38	Department of Conservation 89	89.1	Oppose	<p>Mercury considers that the final form of the NPS-IB when it is eventually gazetted may be quite different to the exposure draft of the NPS-IB which was the subject of a large number of submissions. Mercury considers therefore that it is not appropriate to pre-empt possible outcomes of the NPS-IB prior to its gazettal and that any update to the Strategic Directions chapter must be first subject to a public process.</p> <p>Mercury supports the enhancement and regeneration of indigenous biodiversity in NZ. Long term success of biodiversity is reliant upon the reduction of greenhouse gases. Mercury seeks to ensure any amendments to plan change 38 will provide for the use, development and maintenance of infrastructure for renewable electricity generation to be able to operate and create renewable electricity.</p>	Disallow	The entire submission point.
38	Department of Conservation 89	89.2	Oppose	<p>Mercury considers any additional objectives and/or policies or definitions in relation to biodiversity should be subject to a public process. Furthermore, Mercury considers that there could be unintended consequences if amendments are made to include objectives and/or policies or definitions in relation to biodiversity.</p> <p>Mercury supports the enhancement and regeneration of indigenous biodiversity in NZ. Long term success of biodiversity is reliant upon the reduction of greenhouse gases. Mercury seeks to ensure any amendments to plan change 38 will provide for the use, development and maintenance of infrastructure for renewable electricity generation to be able to operate and create renewable electricity.</p>	Disallow	The entire submission point.
38	Federated Farmers of New Zealand – Rotorua / Taupō 91	91.6	Oppose	<p>Mercury opposes the addition of this policy.</p> <p>Reverse sensitivity effects on rural land use activities is already addressed in the General Rural and Rural Lifestyle Environments Chapter (Plan Change 42) and therefore not needed in the Strategic Direction Chapter (Plan Change 38).</p> <p>Mercury is also concerned that the scope of the proposed objective is too narrow and would need to include 'consented activities' which have yet to be constructed. In Mercury's original submission (OS68) on plan change 42, Mercury seeks to ensure that the words 'lawfully established and or consented activities' are included.</p> <p>Mercury opposes this policy and seeks to amend objective 3b.2.5 in plan change 42 which addresses reserve sensitivity appropriately.</p>	Disallow	The entire submission point.
38	Taupō Climate Action Group 114	114.1	Support	<p>Mercury supports the inclusion of climate change as a strategic direction.</p> <p>In Mercury's original submission we requested an objective to reduce greenhouse gases (by increasing REG). The wording proposed in our original submission is:</p>	Allow	The entire submission point.

				E.g: 4. An increase in the amount of electricity generated from renewable sources within the Taupo District to assist with the decarbonisation of the economy.		
38	Taupō Climate Action Group 114	114.7	Support	Mercury supports the recognition of significant geothermal features in the Strategic Directions.	Allow	The entire submission point
38	Taupō Climate Action Group 114	114.8	Oppose	Note duplication in summary of submission. As set out above in respect of submission point 114.7, Mercury supports the recognition of significant geothermal features in the Strategic Directions. However, Mercury opposes the additional objective seeking “protection” without providing for appropriate REG activities in significant geothermal areas.	Disallow	The entire submission point.
115	Te Kotahitanga o Ngati Tuwharetoa (“TKNT”) 115	115.15	Support	Mercury support MKNT submission seeking that Te Kaupapa Kaitiaki should be recognised and provide for. Te Kaupapa Kaitiaki is a high-level plan for the Taupō catchment. Its purpose is to identify the significant issues, values, vision, objectives and outcomes.	Allow	The entire submission point.

Table 2: Plan Change 41 – Removal of Fault Lines

Plan Change Number	Submission Name / submission number	Submitter point number	Support / Oppose	Reasons	Allow / Disallow	Do you wish all or part of the point to be allowed or disallowed? Please specify if part of the point.
PC41 – Removal of Fault Lines	Toka Tū Ake EQC 16	16.1	Oppose	<p>Mercury supports the Council approach of relying on the Building Act as the primary mechanism for ensuring that the risks posed to buildings from potential fault lines are mitigated.</p> <p>Mercury opposes the re-introduction of the discretionary activity rule (4e.10) without having the opportunity to review the fault line overlay on the planning maps from which the 20m setback would be measured.</p>	Disallow	The entire submission point.
PC41 – Removal of Fault Lines	Toka Tū Ake EQC 16	16.2	Oppose	<p>Mercury supports the Council removing the “out of date” fault lines shown on the operative District Plan planning maps.</p> <p>While Mercury is supportive of more accurate fault line information being made available, if this is to be the basis of regulation such as a setback rule in the District Plan, this should be subject to a public process.</p>	Disallow	The entire submission point.
PC41 – Removal of Fault Lines	Contact Energy Limited 93	93.22	Support	<p>Mercury supports the Council approach of relying on the Building Act as the primary mechanism for ensuring that the risks posed to buildings from potential fault lines are mitigated.</p> <p>Mercury agrees with Contact Energy relief that PC41 be adopted as notified.</p>	Allow	The entire submission point.

Table 3: Plan Change 42 – General Rural and Rural Lifestyle Environments

Plan Change	Submission Name /Submission Number	Submission point number	Support / Oppose	Reasons	Decision requests (allow/disallow)	Do you wish all or part of the point to be allowed or disallowed? Please specify if part of the point.
42	New Zealand Agricultural Aviation Association 23	23.4	Support	<p>Mercury’s original submission requested an amendment to the definition of “Rural Industry” to delete the reference to geothermal/electricity generation, as follows:</p> <p>“An activity that directly supports, services or is dependent on primary production and has a locational need to be within the General Rural Environment (rather than an urban environment). These activities include, but are not limited to; forestry, agriculture, and dairy farming and geothermal/electricity generation.”</p> <p>Mercury is equally satisfied with the amendment proposed by this submitter which it agrees aligns with the National Planning Standards.</p> <p>The key point from Mercury’s perspective is that the term ‘geothermal / electricity generation’ is deleted (and is covered by a separate proposed definition for ‘Renewable Electricity Generation’).</p>	Allow	The entire submission point.
42	Horticulture New Zealand 26	26.3	Support	<p>Mercury’s original submission requested an amendment to the definition of “Rural Industry” to delete the reference to geothermal/electricity generation, as follows:</p> <p>“An activity that directly supports, services or is dependent on primary production and has a locational need to be within the General Rural Environment (rather than an urban environment). These activities include, but are not limited to; forestry, agriculture, and dairy farming and geothermal/electricity generation.”</p> <p>Mercury is equally satisfied with the amendment proposed by this submitter which it agrees aligns with the National Planning Standards.</p> <p>The key point from Mercury’s perspective is that the term ‘geothermal / electricity generation’ is deleted (and is covered by a separate proposed definition for ‘Renewable Electricity Generation’).</p>	Allow	The entire submission point
42	Horticulture New Zealand 26	26.20	Support	Mercury supports the proposed objective as it enables ‘other compatible activities that have a functional and operational need to be in a rural environment’, such as Renewable Electricity Generation.	Allow	The entire submission point.
42	Horticulture New Zealand 26	26.29	Oppose	<p>Mercury supports a “reverse sensitivity” policy and also seeks amendments to policy 3b.2.13 (ref: OS #68).</p> <p>Mercury notes that this submitter’s requested wording goes some way to addressing the issue of “reverse sensitivity” but is deficient in that it only refers to reverse sensitivity in relation to primary production activities and not “on permitted, lawfully established and/or consented neighbouring activities” which in Mercury’s case, may be one of its renewable electricity generation activities. Mercury opposes the limitation of “reverse sensitivity” effects to on primary production activities only.</p>	Disallow	The entire submission point.
42	Miraka Ltd 35	35.9	Oppose	<p>Mercury supports a “reverse sensitivity” policy and also seeks amendments to policy 3b.2.13 (ref: OS #68).</p> <p>Mercury supports a change to this policy, however, opposes the wording being limited to consideration of “reverse sensitivity” effects to just “lawfully established activities”. Mercury considers the policy should include “on permitted, lawfully established and/or consented neighbouring activities” which in Mercury’s case, may be one of its renewable electricity generation activities.</p>	Disallow	The entire submission point.
42	Taupo District Council 71	71.1	Support	<p>Mercury supports the Foreshore Protection Area and the Operative District Plan 5m minimum building setback rule being included in the proposed Rural General and Rural Lifestyle Environments.</p> <p>Mercury is however concerned that the proposed rule is not clear and requires clarification.</p>	Disallow	Disallow the submission point, unless clarification is provided that the 5.0m minimum building setback rule does not include Renewable Electricity Generation Activities.

				<p>The Operative District Plan and proposed minimum building setback rule in Plan Change 42 provided specific provisions for REG. These include:</p> <ul style="list-style-type: none"> • 0m front boundary setback for Renewable Electricity Generation activities where they extend over a road. • 0m boundary setback for buildings and activities associated with Renewable Generations Activities within Electricity Generation Core Sites • 0m boundary setbacks for buildings and activities associated with Renewable Generations Activities within Geothermal Area in Section O. <p>Mercury seeks the rule be amended to make it clear that the 5m minimum building setback from the Foreshore Protection Area Boundary does not apply to Renewable Electricity Generation activities that have a functional and operational need to be located within the foreshore area.</p>		
42	Taupo District Council 71	71.2	Support	Mercury considers the minimum setback rule should be consistent between the Rural General and Rural Lifestyle Environments and accordingly seeks the same relief as set out in respect of point 71.1.	Disallow	Disallow the submission point, unless clarification is provided that the 5.0m minimum building setback rule does not include Renewable Electricity Generation Activities.
42	Balance Agri-Nutrients 78	78.3	Support	<p>Mercury's primary submission requested an amendment to the definition of "Rural Industry" to delete the reference to geothermal/electricity generation, as follows:</p> <p>"An activity that directly supports, services or is dependent on primary production and has a locational need to be within the General Rural Environment (rather than an urban environment). These activities include, but are not limited to; forestry, agriculture, and dairy farming and geothermal/electricity generation."</p> <p>Mercury is equally satisfied with the amendment proposed by this submitter which it agrees aligns with the National Planning Standards.</p> <p>The key point from Mercury's perspective is that the term 'geothermal / electricity generation' is deleted (and is covered by a separate proposed definition for 'Renewable Electricity Generation').</p>	Allow	The entire submission point.
42	Cheal Consultants 79	79.11	Oppose	<p>Mercury's original submission requested an amendment to the definition of "Rural Industry" to delete the reference to geothermal/electricity generation, as follows:</p> <p>"An activity that directly supports, services or is dependent on primary production and has a locational need to be within the General Rural Environment (rather than an urban environment). These activities include, but are not limited to; forestry, agriculture, and dairy farming and geothermal/electricity generation."</p> <p>Renewable Electricity Generation are not simply a "Rural Industry" because they are located in a Rural Environment, they are REG activities located in the Rural Environment.</p> <p>Mercury is equally satisfied with the amendment proposed by other submitters (NZAAA, Horticulture New Zealand and Balance Agri-Nutrients) which it agrees aligns with the National Planning Standards.</p> <p>The key point from Mercury's perspective is that the term 'geothermal / electricity generation' is deleted (and is covered by a separate proposed definition for 'Renewable Electricity Generation').</p>	Disallow	Disallow part of the submission point where the definition of 'Rural Industry' includes 'geothermal/electricity generation' as this should be deleted.
42	Transpower New Zealand Limited 110	110.8	Support	Mercury supports the alignment of the definitions with the National Planning Standards, including 'rural industry'. In respect of 'rural industry' the key point from Mercury's perspective is that the term 'geothermal / electricity generation' is deleted (and is covered by a separate proposed definition for 'Renewable Electricity Generation').	Allow	The entire submission point.

Table 4: Plan Changes 38 and 42 – Transpower (OS #110)

Plan Change	Submission Name / Submission Number	Submission point number	Support / Oppose	Reasons	Allow / Disallow	Do you wish all or part of the point to be allowed or disallowed? Please specify if part of the point.
38 & 42	Transpower New Zealand Limited 110	110 – Section entitled: 'Introduction'	Support	Mercury supports the development of an energy / infrastructure chapter to give effect to the NPSET. This should however not be limited to NPSET but also include Energy and NPS-REG.	Allow	The entire submission point
38 & 42	Transpower New Zealand Limited 110	110 - Section entitled 'Overview'.	Support	Within the Taupo District Mercury's REG power stations connect with the national grid. Ensuring the District Plan recognises and provides for the operation, maintenance, upgrade and development of the electricity transmission network , as well as REG, is of critical importance.	Allow	The entire submission point
38 & 42	Transpower New Zealand Limited 110	110 – Section entitled: 'Transpower's Feedback on Plan Changes 38-43'.	Support	Mercury supports the development of an Energy / Infrastructure chapter to give effect to the NPSET. This should however not be limited to NPSET but also include REG and give effect to the NPS-REG.	Allow	The entire submission point
38 & 42	Transpower New Zealand Limited 110	110 – Section entitled: 'Transpower's Feedback on Plan Changes 38 – 43'.	Support	Mercury supports Transpower's requests for consistent plan wide recognition and provisions specific to the National Grid to give effect to the NPSET.	Allow	The entire submission point
38 & 42	Transpower New Zealand Limited 110	110 -Section entitled: 'Specific Comments'	Support	Mercury supports Transpower's requests for consistent plan wide recognition and provisions specific to the National Grid to give effect to the NPSET.	Allow	The entire submission point

Table 5: Submitters to be served copies of Mercury further submissions

Submission #	Submitter name	Contact person	Email address
#16	Toka Tū Ake EQC	Jo Horrocks	resilience@eqc.govt.nz
#23	NZ Agricultural Aviation Association (NZAAA)	Tony Michell	eonzaaa@aviationnz.co.nz
#26	Horticulture NZ	Sarah Cameron	sarah.cameron@hortnz.co.nz
#29	Waikato Regional Council	Joao Paulo	joapaulo.silva@waikatoregion.govt.nz
#35	Miraka Ltd	Patrick Edwards	patrick.edwards@miraka.co.nz
#38	Federated Farmers	Jo-Anne Cook Munro	jcookmunro@fedfarm.org.nz
#62	Alana Delich	Alana Delich	alana.delich@gmail.com
#71	Taupo District Council	Kendall Goode	kgoode@taupo.govt.nz
#78	Balance Agri-Nutrients	Dominic Adams,	Dominic.Adams@ballance.co.nz
#79	Cheal Consultants	Catriona Eagles,	catrionae@cheal.co.nz
#89	Department of Conservation	Ashiley Sycamore (Hamilton)	asycamore@doc.govt.nz
#91	Federated Farmers of NZ - Rotorua / Taupō	Jo-Anne Cook Munro	jcookmunro@fedfarm.org.nz
#93	Contact Energy Limited	Mark Chrisp	mark.chrisp@mitchelldaysh.co.nz
#110	Transpower New Zealand Limited	Trudi Burney	environment.policy@transpower.co
#114	Taupō Climate Action Group	Alana Delich	alana.delich@gmail.com
#115	Te Kotahitanga o Ngati Tuwharetoa ("TKNT")	George Asher	geoera@xtra.co.nz