

NZ Transport Agency Waka Kotahi Reference: 2022-1730

18 March 2026

Taupō District Council
C/- Hilary Samuel & Christle Pilkington
Private Bag 2005
Taupō Mail Centre 3352

Via email: districtplan@taupo.govt.nz

Dear Hilary and Christle,

NZ Transport Agency Waka Kotahi Submission on Taupō District Plan Changes 47, 48 and 49

Attached is the NZ Transport Agency Waka Kotahi (NZTA) submission on Taupō District Plan Changes 47,48 and 49.

We welcome the opportunity to discuss the contents of our submission with council officers in advance of a hearing.

If you have any questions, please contact me.

Yours sincerely



Luke Braithwaite

Senior Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services
Environmentalplanning@nzta.govt.nz
Luke.braithwaite@nzta.govt.nz

FORM 5**NZ Transport Agency Waka Kotahi submission on a notified proposal for the Taupō District Plan Changes 47,48 and 49 under Clause 6 of Schedule 1 of the Resource Management Act 1991**

18 March 2026

District Plan Changes 47,48 and 49

Taupō District Council

Private Bag 2005

Taupō Mail Centre 3352

Via email: districtplan@taupo.govt.nz

This is a submission on a change proposed to the following plan:

Taupō District Plan

The specific provisions of the proposal that our submissions relate to are:

The Taupō District Plan Changes 47,48 and 49 to the extent the provisions have the potential to compromise NZ Transport Agency Waka Kotahi (NZTA) statutory obligations.

The NZ Transport Agency Waka Kotahi submission is:

1. NZTA is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (LTMA) and the Government Roding Powers Act 1989. The primary objective of NZTA under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest. An integrated approach to transport planning, funding and delivery is taken by NZTA. This includes investment in public transport, walking and cycling, local roads and the construction and operation of state highways.
2. In the 2024 National Land Transport Programme, NZTA has allocated investment in the Waikato Region (including the Taupō District) to the improvement, operation and maintenance of the State Highway network, including public transport investment, walking and cycling and transport planning. In addition, NZTA is a co-funder of the local roading network. NZTA is therefore a significant investor in the infrastructure required to achieve the land use change and growth anticipated in the Taupō District Plan.
3. The NZTA submission seeks amendments to the Proposed Taupō District Plan in the following topic areas:
 - Addition of access and noise standards within the Permitted Activity standards.
 - Amendments to the permitted vehicle movements to state highways,
 - Addition of reverse sensitivity provisions as they relate to the state highway.
 - Amendments to the permitted number of dwellings per site where access is to a state highway,
 - Amendments to the NZTA designation numbering and minor mapping amendments.

4. The changes requested are made to:
 - a. Ensure that NZTA can carry out its statutory obligations.
 - b. Reduce interpretation and processing complications for decision makers.
 - c. Provide clarity for all plan users.
5. Where a provision is not specified in Table 1 and 2 below or Attachment A, NZTA generally supports the way it is drafted.
6. NZTA could not gain an advantage in trade competition through this submission.

We seek the following decision from the local authority:

Amend the provisions of the Proposed District Plan as detailed in Table 1 and Attachment A including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

NZTA would like to be heard in support of its submission. If others make a similar submission, NZTA will consider presenting a joint case with them at a hearing.

For all correspondence associated with these plan changes please direct this to me, Luke Braithwaite (Senior Planner) at Luke.Braithwaite@nzta.govt.nz and NZTA Environmental Planning Team at environmentalplanning@nzta.govt.nz.

Signature of person authorised to sign on behalf of Submitter:



Alan Catchpole

Principal Planner

Poutiaki Taiao (Environmental Planning)

Transport Services

NZ Transport Agency Waka Kotahi

Environmentalplanning@nzta.govt.nz

Alan.Catchpole@nzta.govt.nz

Table 1: Decisions Sought on Taupō District Plan Changes 47, 48 and 49

The following table sets out the amendments sought to the Taupō District Plan Changes 47,48 and 49. Table 2 identifies those provisions that NZ Transport Agency Waka Kotahi supports.

Italics = *Taupō District Plan changes notified text*

Underline, not italics = proposed additions.

Strikethrough, italics = ~~*proposed deletions*~~.

Chapter	Plan Provision	Support / Oppose	Reason for Support or Opposition	Relief Sought
Plan Change 47 Special Purpose Zones – Māori Purpose Zone	MPZ-R1 - Permitted Activities	Oppose in Part	NZTA supports providing for Permitted Activities in the Māori Purpose Zone and largely agree with the criteria provided. However, NZTA needs to ensure that road safety and human health are taken into account to provide for these activities. NZTA is concerned with the level of vehicle use that would be permitted by this rule without adequate consideration of the access to the site or road safety. NZTA seeks that the activities proposed are Permitted where a site fronts the state highway, provided that the site is assessed per TRAN R4 & R5 to ensure that the site entrance will allow for the safe and efficient use of the site without increasing the safety risk to users of the site. NZTA seeks that the MPZ be included within the noise corridor boundary overlay rule as this will ensure that the potential adverse effects (including conflicts between activities and reverse sensitivity effects) are mitigated.	Amend as follows: <i>Permitted Subject to:</i> <i>a) Compliance MPZ-S1 to S8 unless specifically provided for in SCHED13.11 - MPZ; and</i> <i>b) Compliance with any relevant standards in SCHED13.11 - MPZ s; and</i> <i>c) Compliance with standards from MPZ - Other Plan Matters; and</i> <i>d) Where the site fronts a state highway compliance with Section 7.3 TRAN R4 and R5 and 12.6 NOISE R8</i> <i>de) Is not identified as a CON, RDIS, DIS or NC activity within the MPZ.</i>
	NOISE R8	Oppose in Part	NZTA seeks that the Noise Control Boundaries Overlay for Sensitive Activities apply to the Māori Purpose Zone. NZTA seeks that this either: a. Is included as an amendment to the 12.6 NOISE chapter, Rule 8 to include the MPZ; or, b. that this provision be included within the zone specific MPZ Rules (see our submission point below) NZTA seeks that the MPZ be included within the noise corridor boundary overlay rule as this will ensure that the potential adverse effects (including conflicts	Amend as follows: Amend NOISE-R8 to include reference to the Māori Purpose Zone - MPZ zoning in addition to the existing zoning references of 'General Rural Zone - GRUZ' and 'Rural Lifestyle Zone - RLZ'.

Chapter	Plan Provision	Support / Oppose	Reason for Support or Opposition	Relief Sought
			between activities and reverse sensitivity effects) are mitigated. The road network operates 24/7 with variability in traffic. Noise and vibration effects can interrupt amenity and enjoyment, as well as ability to sleep which can have significant impacts on people's health and wellbeing. Appropriate mitigation is critical to ensuring that undue restrictions are not placed on the operation of these transport networks and the health and wellbeing of those residing or otherwise occupying nearby sites is protected. Part 2 of the Act supports the efficient use and development of the road network while also enabling people and communities to provide for their well-being and their health and safety. An appropriate balance needs to be achieved between ensuring the transport network is efficiently utilised and adjacent development can be facilitated, without compromising safety of people and communities. The proposed amendment will provide for new or altered buildings within the noise corridor, which can achieve the required internal noise standard, to be permitted activities. Where windows need to be closed to achieve the desired internal noise levels then ventilation performance is prescribed. NZTA will provide corrected geospatial shapefiles to Council in due course to provide for an updated road noise overlay layer.	

Chapter	Plan Provision	Support / Oppose	Reason for Support or Opposition	Relief Sought
	New Provision	Support	NZTA seeks that the Noise Control Boundaries Overlay for Sensitive Activities apply to the Māori Purpose Zone. NZTA seeks that this either: - Is included as an amendment to the 12.6 NOISE chapter, Rule 8 to include the MPZ (see our submission point above); or, - that this provision be included within the zone specific MPZ Rules. NZTA seeks that the MPZ be included within the noise corridor boundary overlay rule as this will ensure that the potential adverse effects (including conflicts between activities and reverse sensitivity effects) are mitigated. The road network operates 24/7 with variability in traffic. Noise and vibration effects can interrupt amenity and enjoyment, as well as ability to sleep which can have significant impacts on people's health and wellbeing. Appropriate mitigation is critical to ensuring that undue restrictions are not placed on the operation of these transport networks and the health and wellbeing of those residing or otherwise occupying nearby sites is protected. Part 2 of the Act supports the efficient use and development of the road network while also enabling people and communities to provide for their well-being and their health and safety. An appropriate balance needs to be achieved between ensuring the transport network is efficiently utilised and adjacent development can be facilitated, without compromising safety of people and communities.	Add a New Provision to the MPZ Chapter: <u>Noise Control Boundary Overlay – Sensitive Activities</u> <u>Within the Noise Corridor Boundary Overlay, where:</u> <u>a new building that contains a noise sensitive activity (as identified in Table 3); or</u> <u>an alteration to an existing building resulting in an increase in floor area of a noise sensitive activity; or</u> <u>a new noise sensitive activity is located in an existing building; is proposed, it shall be:</u> <u>Designed, constructed and maintained to achieve indoor design noise levels not exceeding the maximum values in Table 3; and</u> <u>If windows must be closed to achieve the design noise levels in i. above, the building is designed, constructed and maintained with a mechanical ventilation system that:</u> <u>For habitable rooms for a residential activity, achieves the following requirements:</u> <u>Provides mechanical ventilation to satisfy clause G4 of the New Zealand Building Code; and</u> <u>is adjustable by the occupant to control the ventilation rate in increments up to a high air flow setting that provides at least 6 air changes per hour; and</u> <u>provides relief for equivalent volumes of spill air; and</u>

Chapter	Plan Provision	Support / Oppose	Reason for Support or Opposition	Relief Sought
			The proposed amendment will provide for new or altered buildings within the noise corridor, which can achieve the required internal noise standard, to be permitted activities. Where windows need to be closed to achieve the desired internal noise levels then ventilation performance is prescribed. NZTA will provide corrected geospatial shapefiles to Council in due course to provide for an updated road noise overlay layer.	• <u>provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18C and 25C; and</u> • <u>Does not generate more than 35 dB LAeq (30s) when measured 1 metre away from any grille or diffuser.</u> b. <u>For other spaces, is as determined by a suitably qualified and experienced person; and</u> iii. <u>A report is submitted by a suitably qualified and experienced person to the Council demonstrating compliance with i and ii above (as relevant) prior to the construction or alteration of any building containing an activity sensitive to noise.</u> iv. <u>Instead of i, ii and iii above, is within the Noise Corridor Boundary Overlay but is at least 50 metres from the carriageway of any State Highway and is designed so that a noise barrier entirely blocks line-of-sight from all parts of doors and windows to the road surface.</u>
	S6 Number of Dwellings per MPS	Oppose in Part	NZTA supports providing for Permitted Activities in the Māori Purpose Zone and largely agree with the criteria provided. However, NZTA generally requires an Integrated Transport Assessment (ITA) for activities that generate over 100 vehicle movements per day as they tend to require site specific access design or intersection treatment in accordance with Austroads Guides. NZTA then determines whether the access design or	Amend as follows: 15 per MPS; <u>or</u> <u>Where the site fronts a state highway this is limited to eight per MPS</u>

Chapter	Plan Provision	Support / Oppose	Reason for Support or Opposition	Relief Sought
			intersection treatment is appropriate to ensure the proposed activity does not result in any adverse effects upon the safety and efficiency of the state highway network. As such, NZTA seeks that where a site in the MPS has frontage to a state highway this is limited to the 100 vehicle movements per day or eight dwellings in accordance with the trip generation rates within the NZTA Planning Policy Manual chapter on Access onto the state highway from private property - Table 8.4 Typical New Zealand Trip Generation Rates where this state a trip generation rate of 10.7 vehicles per day associated with each dwelling.	
	Energy Infrastructure and Transport TRAN-R5 - Maximum Equivalent Vehicle Movements	Oppose in part	NZTA supports providing for Permitted Activities in the Māori Purpose Zone and largely agree with the criteria provided. However, NZTA generally requires an Integrated Transport Assessment (ITA) for activities that generate over 100 vehicle movements per day as they tend to require site specific access design or intersection treatment in accordance with Austroads Guides. NZTA then determines whether the access design or intersection treatment is appropriate to ensure the proposed activity does not result in any adverse effects upon the safety and efficiency of the state highway network. As such, NZTA seeks that where a site in the MPZ has frontage to a state highway this is limited to the 100 vehicle movements per day or eight dwellings in accordance with the trip generation rates within the NZTA Planning Policy Manual chapter on Access onto the state highway from private property - Table 8.4	Amend as follows: 6. Vehicle movements within the MPZ <i>a. MPZ Rural - 200 EVM's for that MPS or 24 per dwelling whichever is higher.</i> <i>b. MPZ Urban - 150 EVMs for that MPS or 24 per dwelling whichever is higher.</i> <u>c. 100 EVM's where access is to a State Highway.</u>

Chapter	Plan Provision	Support / Oppose	Reason for Support or Opposition	Relief Sought
			Typical New Zealand Trip Generation Rates where this state a trip generation rate of 10.7 vehicles per day associated with each dwelling.	
	SUB-R12 – RDIS Activity MPZ	Support in Part	NZTA largely agrees with the criteria provided. However, NZTA need to ensure that road safety is taken into account to provide for subdivisions. NZTA are concerned with the level of vehicle use that would be allowed through a subdivision without adequate consideration of the access to the site or road safety. NZTA seeks that subdivisions that front the state highway are provided for on the basis that the site is assessed per TRAN R4 to ensure that the site entrance will allow for the safe and efficient use of the site without increasing the safety risk to users of the site.	Amend as follows: <i>Matters of Discretion</i> a) <i>Those Objectives and Policies set out in MPZ1 and MPZ2</i> b) <i>The need for the land to remain as Māori land.</i> c) <i>The need to ensure an ongoing connection between the land and its ancestral owners.</i> d) <i>The ability of the land to meet Māori cultural needs.</i> e) <i>That the land is to be used for traditional activities.</i> f) <u>Where the site fronts a state highway compliance with Section 7.3 TRAN R4</u> <i>Notification: Applications under SUB-R12-RDIS Activity MPZ will not be notified.</i>
Plan Change 48 Designations	NZTA01- NZTA10	Support in Part	NZTA Supports the designation tables, however we note that the unique identifier within the table is not in numerical order. For clarity and ease of interpretation NZTA seeks that the numbering be changed so that the numbering is in ascending order, and the state highway are ordered in numerical order.	Amend as follows: <i>State Highway 1</i> <i>Designation Unique Identifier: NZTA01</i> <i>State Highway 5</i> <i>Designation Unique Identifier: NZTA04 NZTA02</i> <i>State Highway 30</i> <i>Designation Unique Identifier: NZTA05 NZTA03</i> <i>State Highway 32</i> <i>Designation Unique Identifier: NZTA06 NZTA04</i> <i>State Highway 41</i> <i>Designation Unique Identifier: NZTA03 NZTA05</i>

Chapter	Plan Provision	Support / Oppose	Reason for Support or Opposition	Relief Sought
				<i>State Highway 46</i> <i>Designation Unique Identifier: NZTA07 <u>NZTA06</u></i> <i>State Highway 47</i> <i>Designation Unique Identifier: NZTA010 <u>NZTA07</u></i>
	Designation Maps	Support in Part	NZTA supports the inclusion of our state highway designations on the planning maps. However, we note that there a few areas of our designations that are required to be corrected, as per Attachment A. NZTA will provide corrected geospatial shapefiles to Council in due course.	Amend as follows: NZTA requests that the state highway designation geospatial shapefiles be corrected as per Attachment A - Specific Amendments Sought to State Highway Designations.

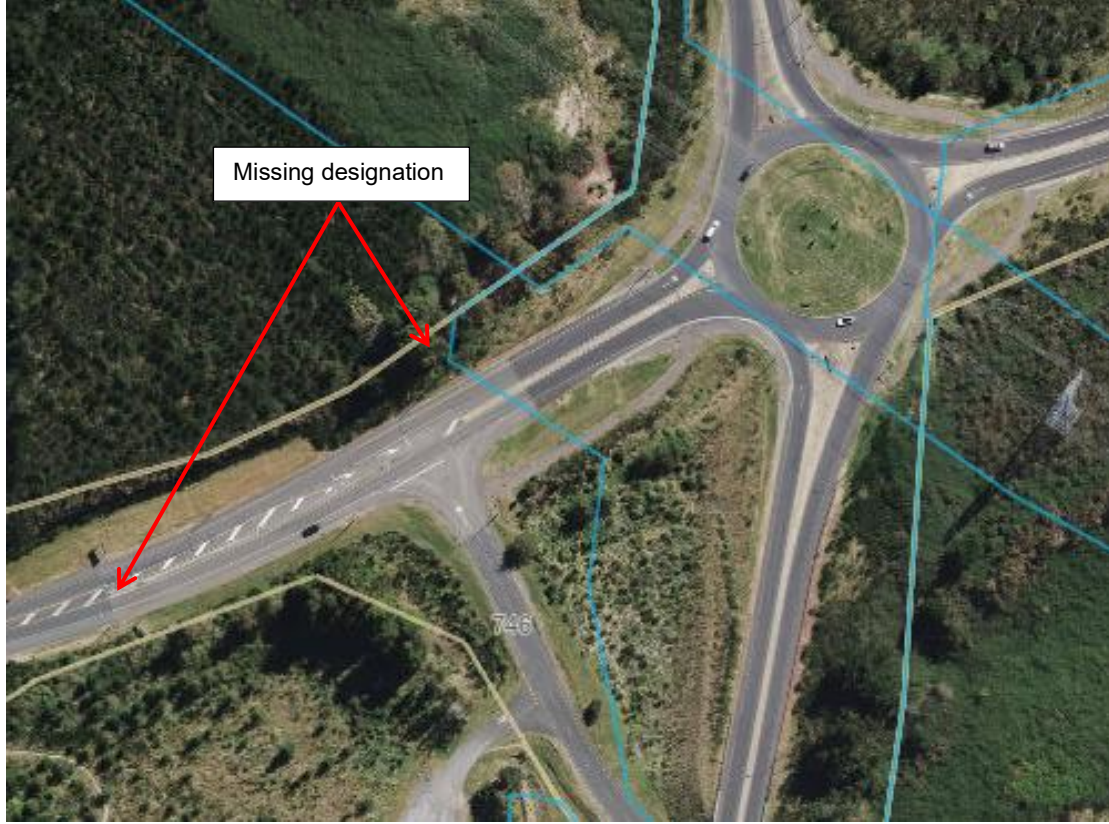
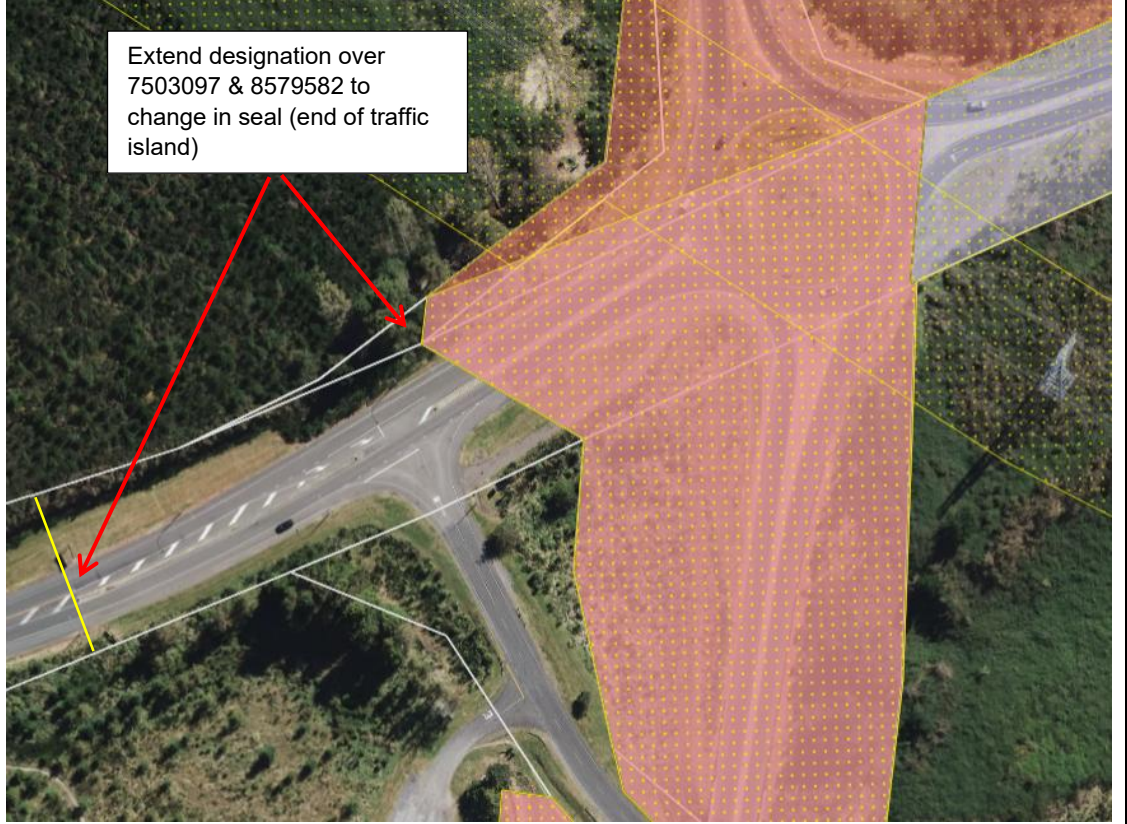
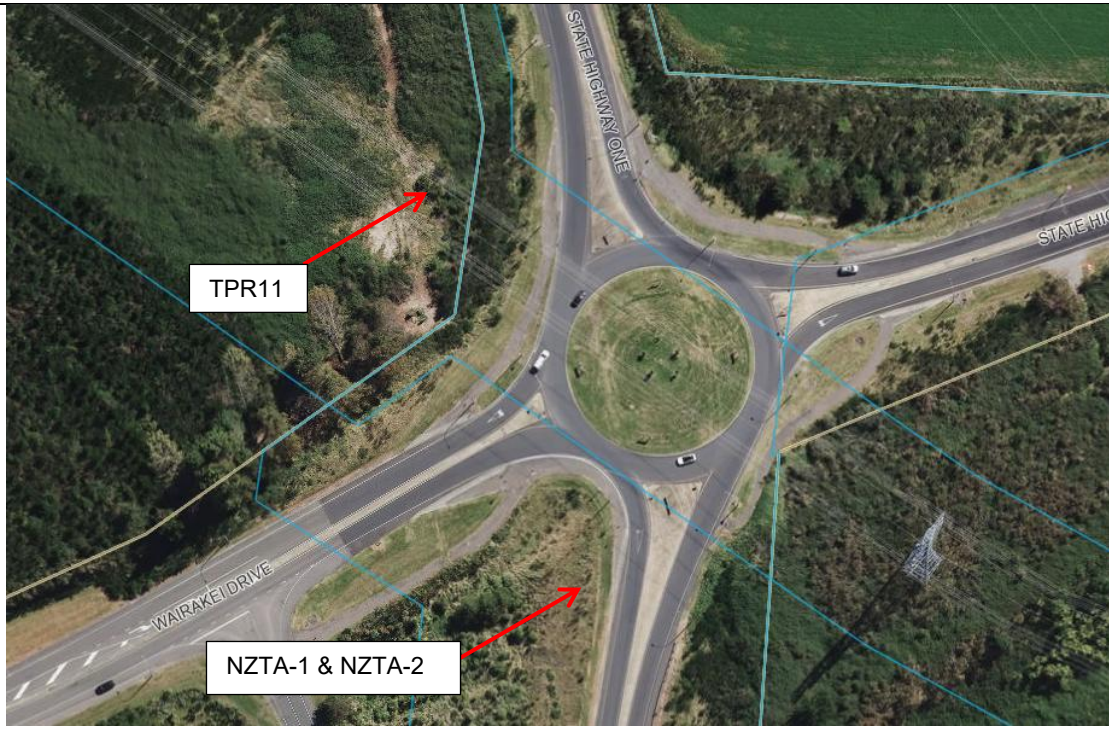
Table 2: Provision of Taupō District Plan Changes 47,48 and 49 That NZ Transport Agency Waka Kotahi Supports

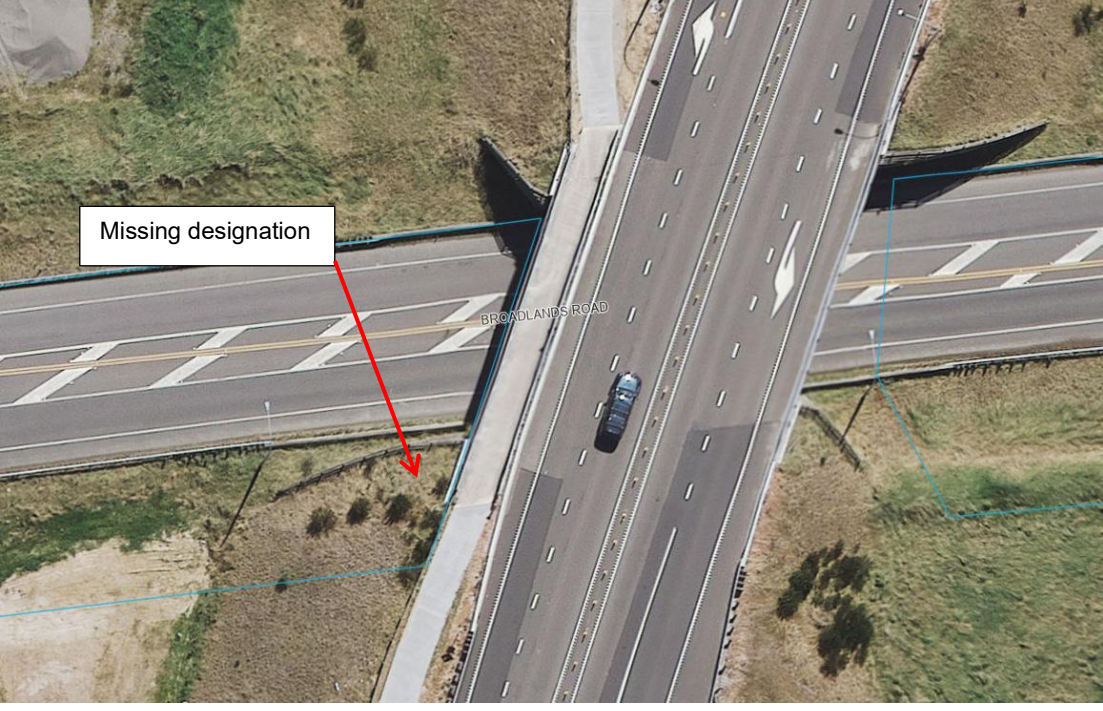
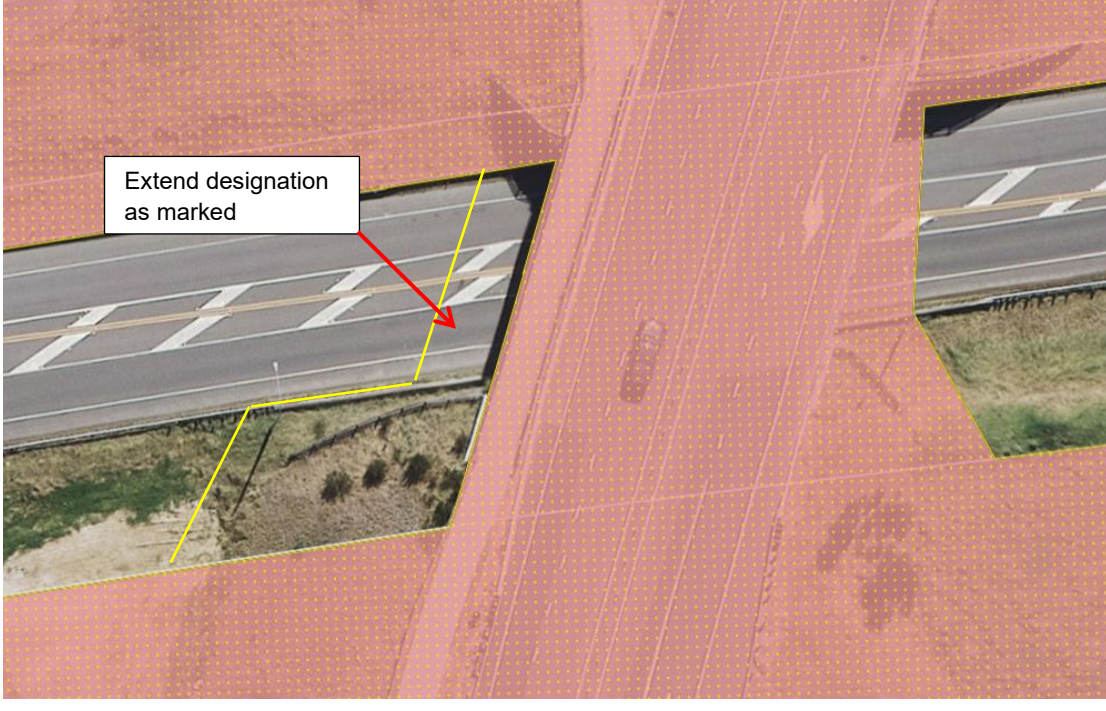
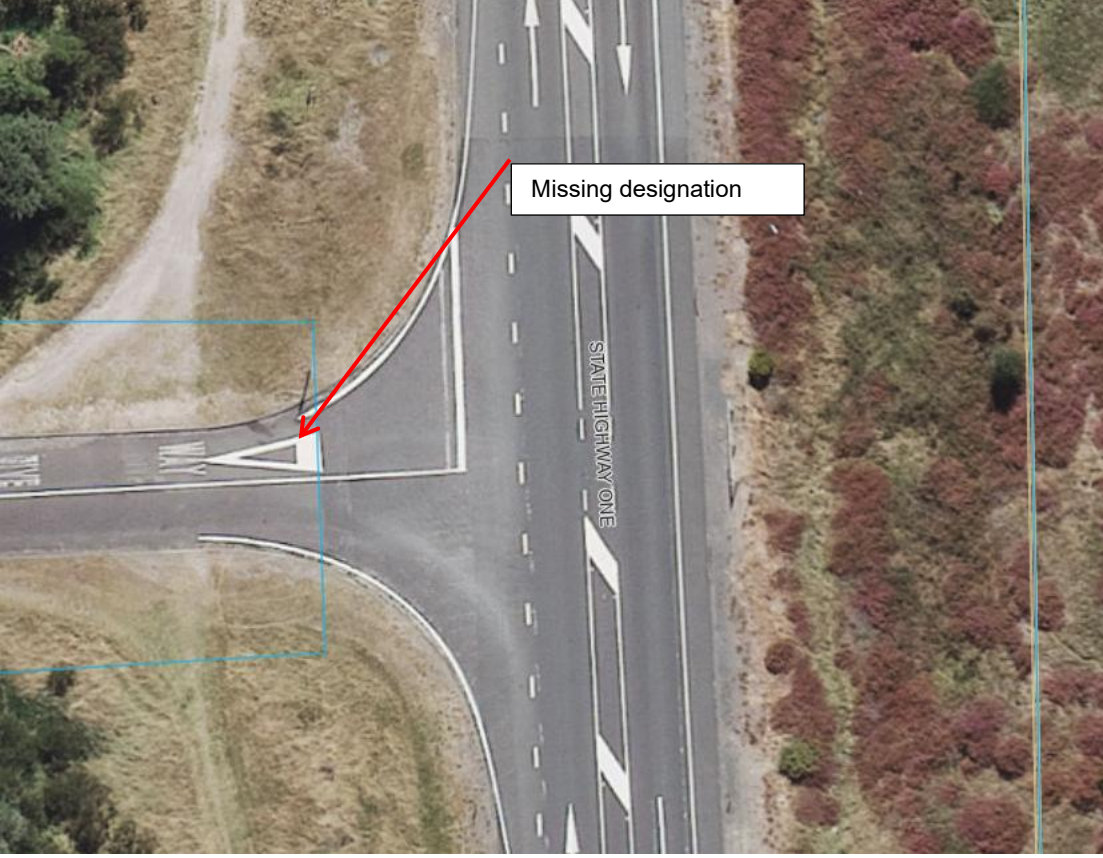
The following table identifies those provisions of Plan Change 47,48 and 49 that are supported because they align with our statutory objectives and resulting in an affordable, integrated, safe, responsive, and sustainable land transport system.

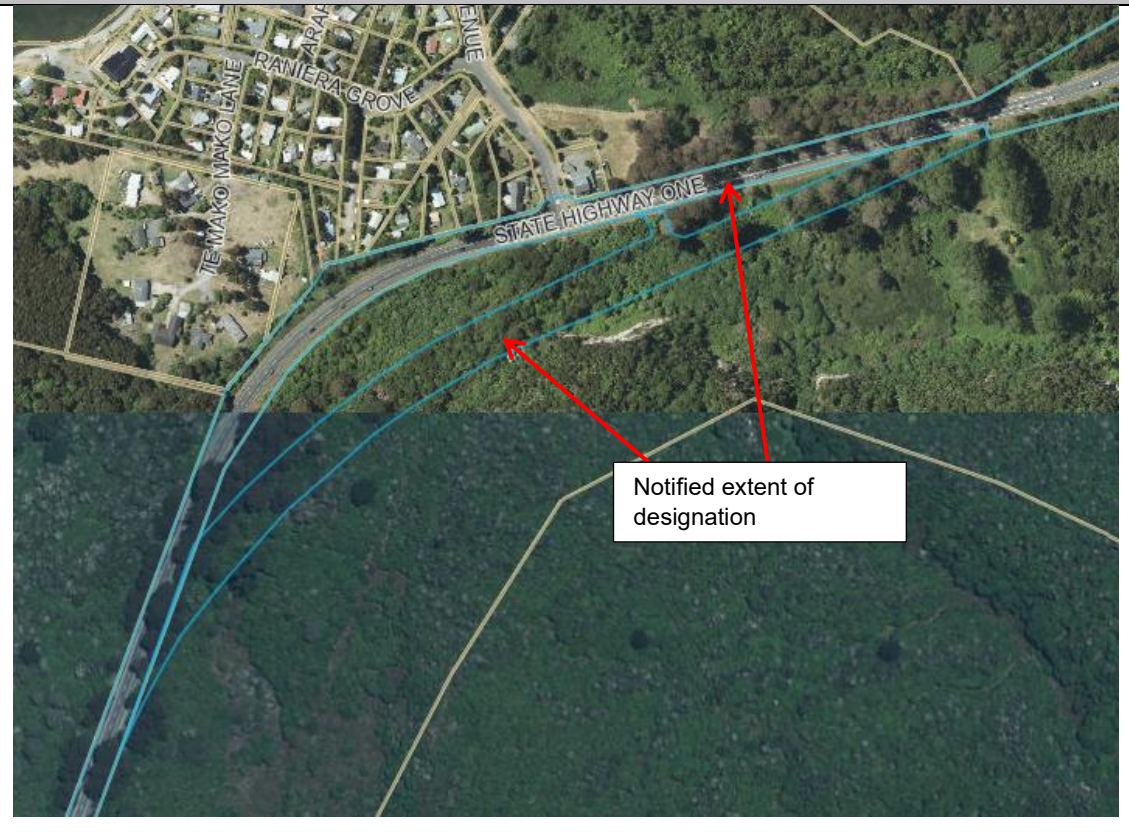
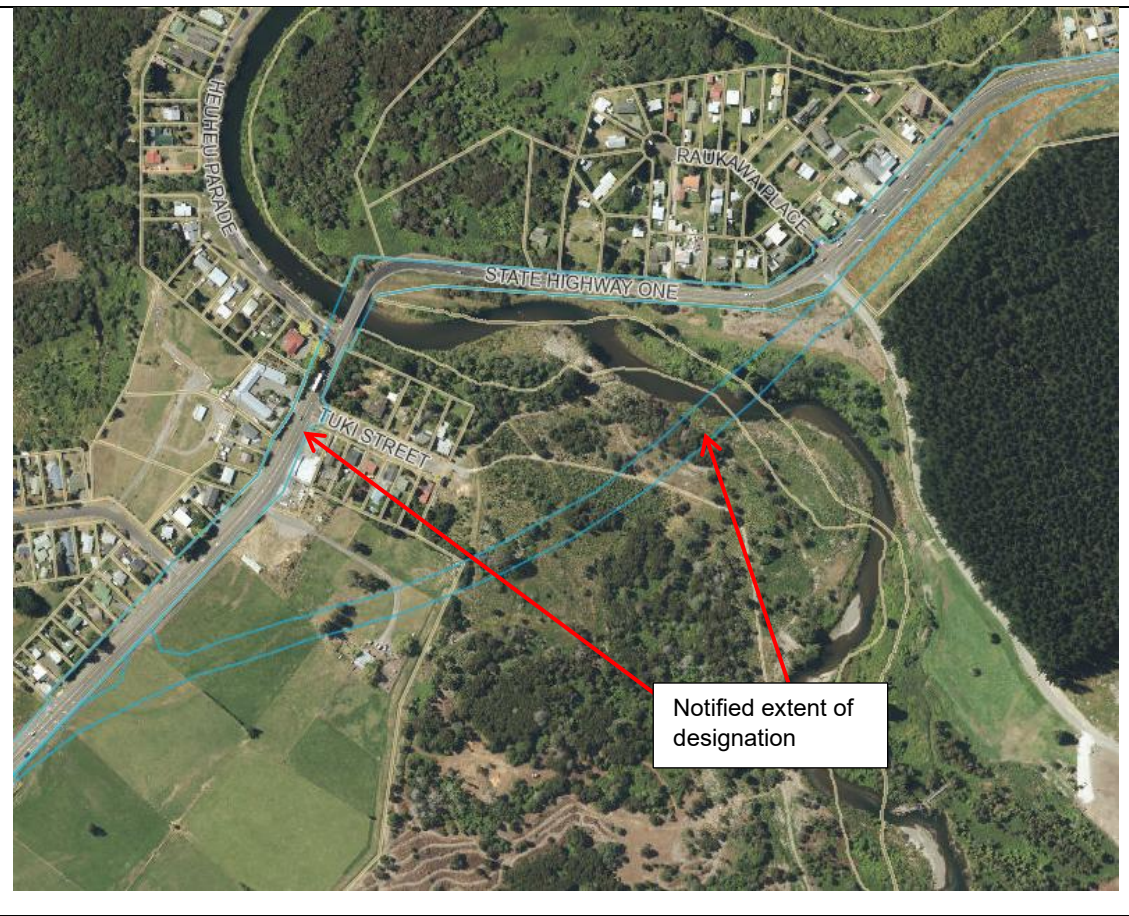
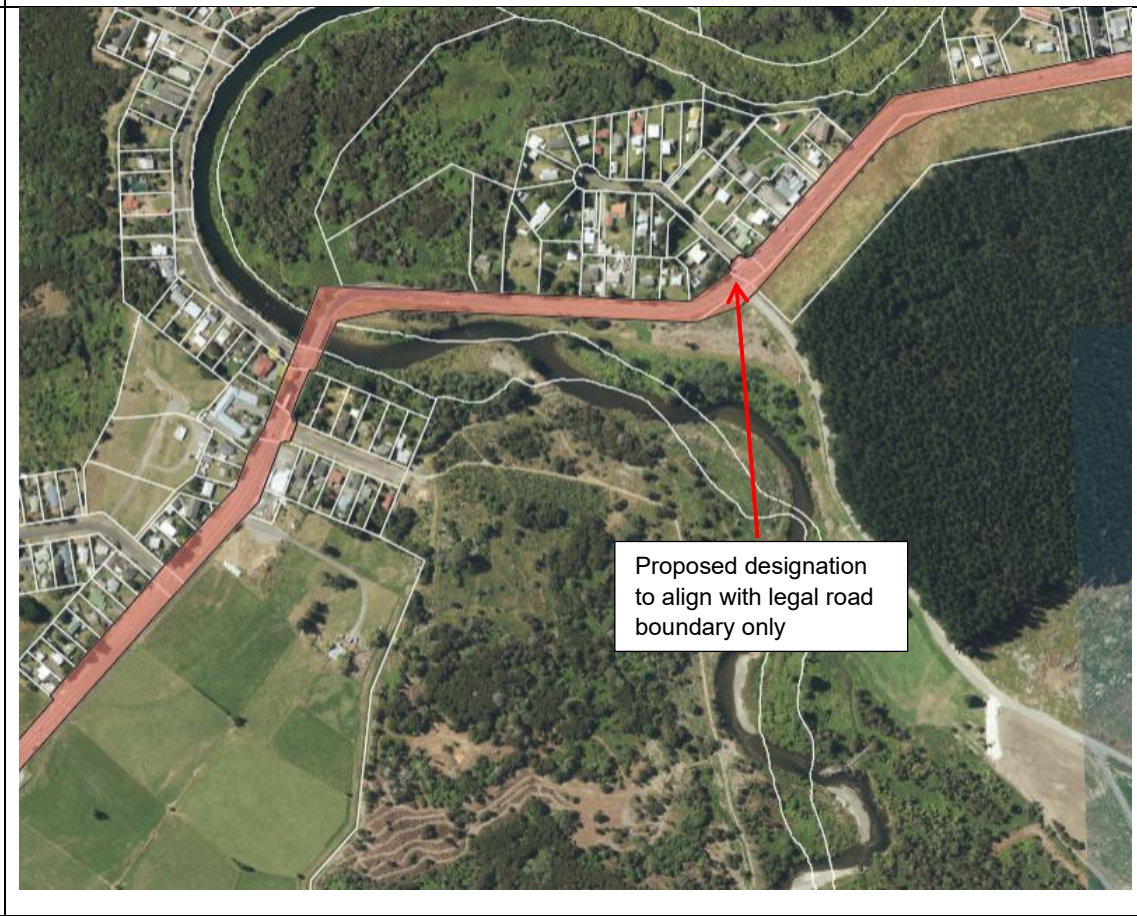
Chapter	Plan Provision	Support / Oppose	Relief Sought
Plan Change 47 Special Purpose Zones – Māori Purpose Zone	MPZ-R2 - RDIS activities	Support	Retain as notified.
	MPZ-S5 - Minimum Building Setbacks from MPS boundary	Support	Retain as notified.
	12 General District Wide Matters Rule 12.5 - Light	Support	Retain as notified.
Plan Change 49	INF-R5	Support	Retain as notified.

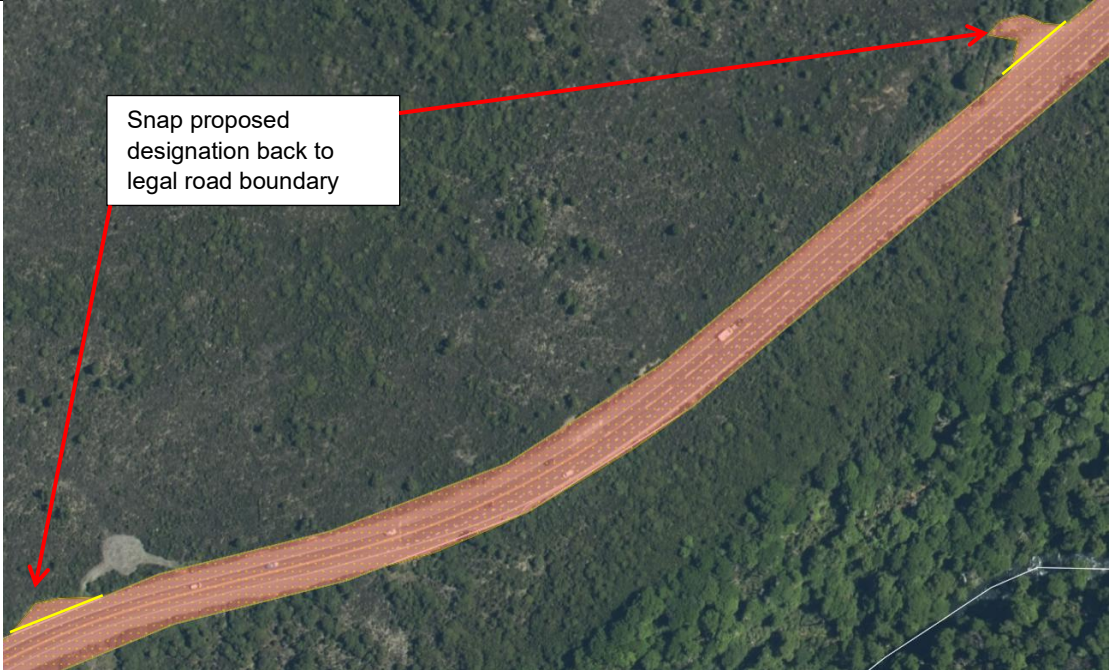
Attachment A: Specific Amendments Sought to State Highway Designations

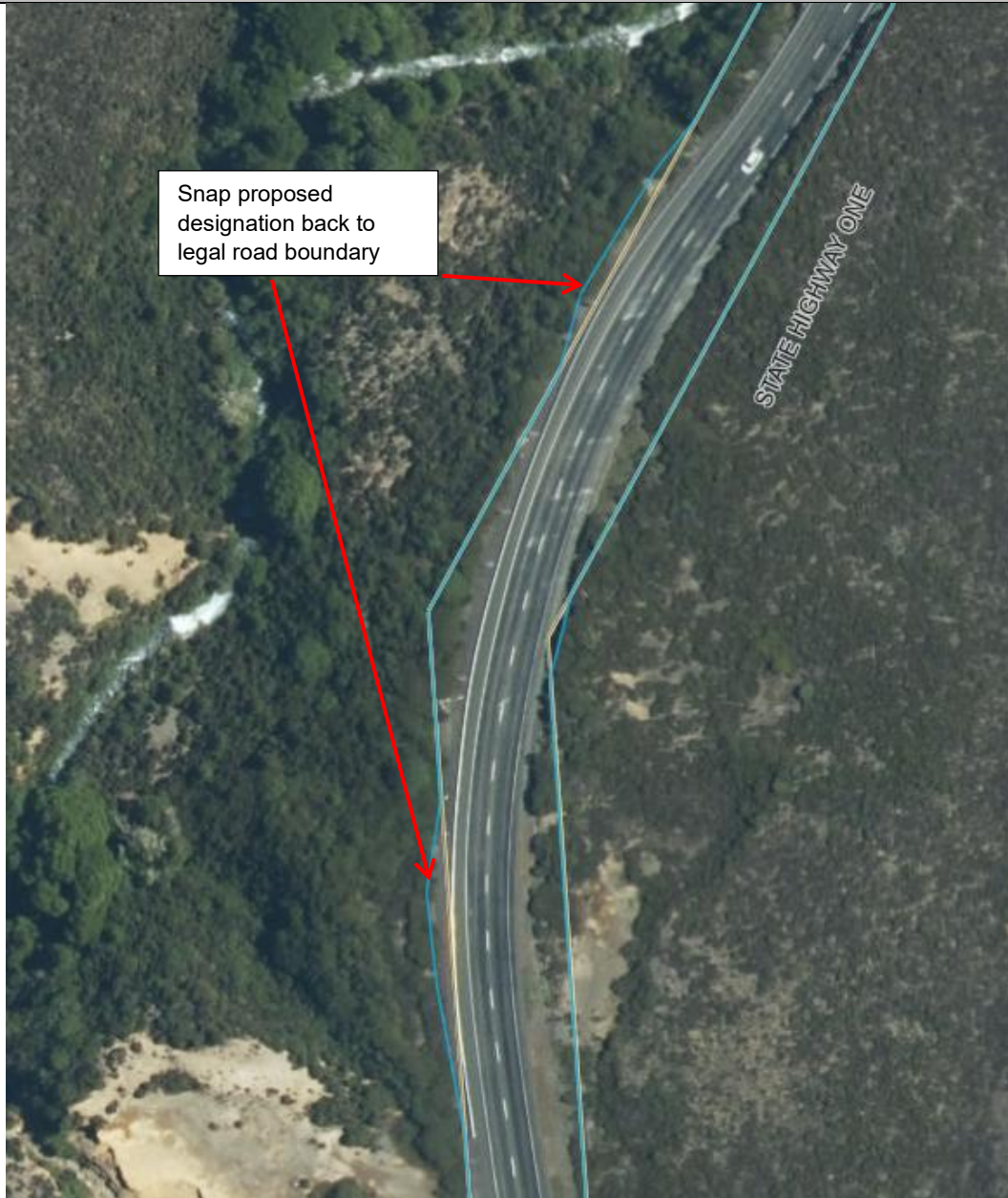
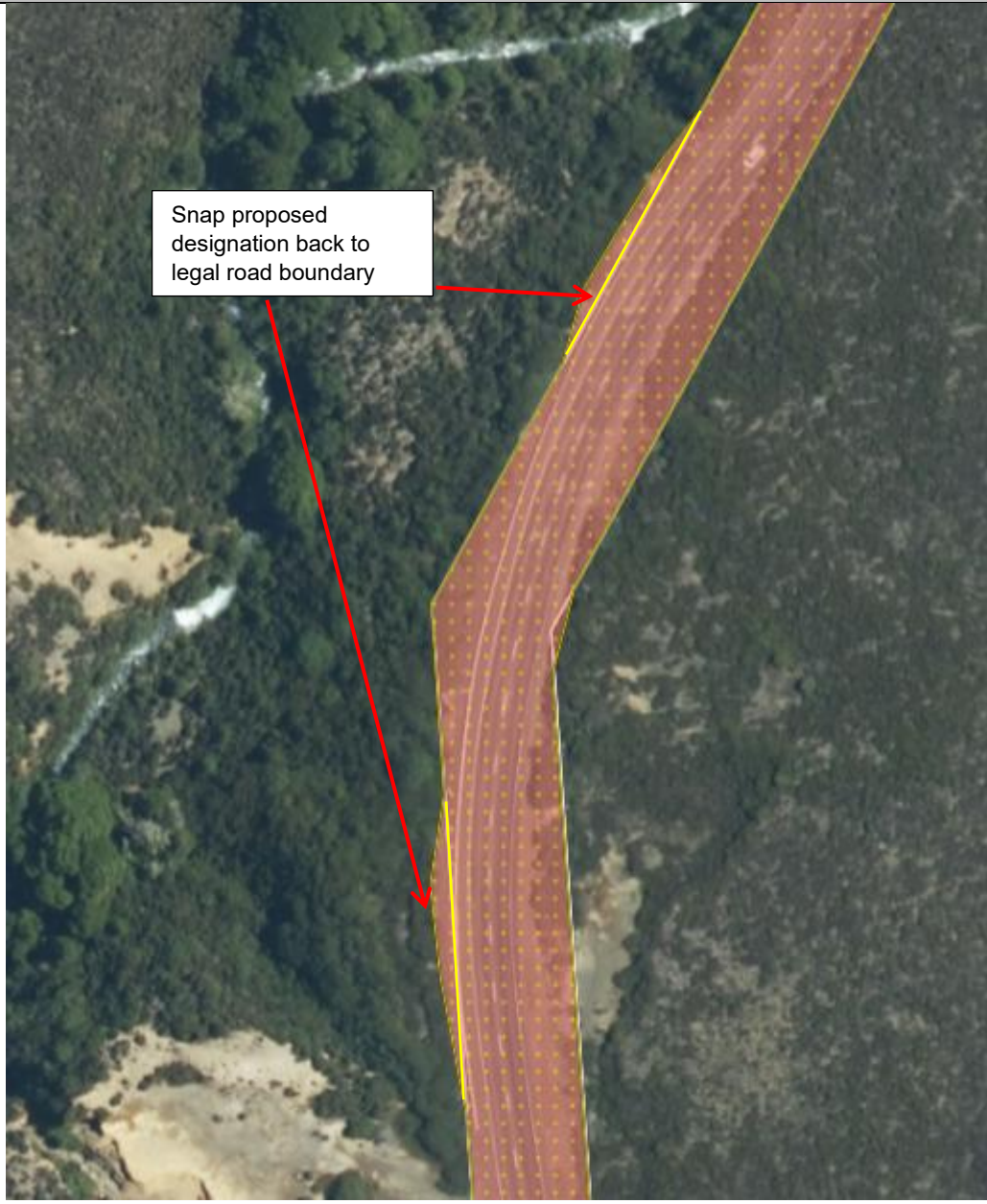
NZTA-1 (State Highway 1)

Property address / Parcel ID	Nature of relief	Proposed NZ Transport Agency Waka Kotahi designations, as notified in the Taupō Proposed District Plan Changes 47-49 (19 February 2026)	Relief Requested
Parcel ID: 7503097 8579582	Extend the proposed state highway designation to include these legal road parcels on the western side of SH1, as marked. Parcel 8579582 to be designated to the end of the existing traffic island (change in seal), as marked by yellow line.		
Parcel ID: 7503097 4581044 4605135 7503093 4568403	To clarify that NZTA is the Primary designation holder where NZTA-1 and NZTA-2 are overlapped by TPR11 in the vicinity of the SH1 / SH5 roundabout.		That Transpower New Zealand Ltd designation TPR11 be amended to “Varies” to reflect that NZTA-1 and NZTA-2 are the Primary designations for the identified parcels. This amendment is required because TPR11 is currently recorded as the Primary designation in the designation hierarchy under section 177 of the Resource Management Act 1991, whereas NZTA-1 and NZTA-2 hold primary status for these parcels.

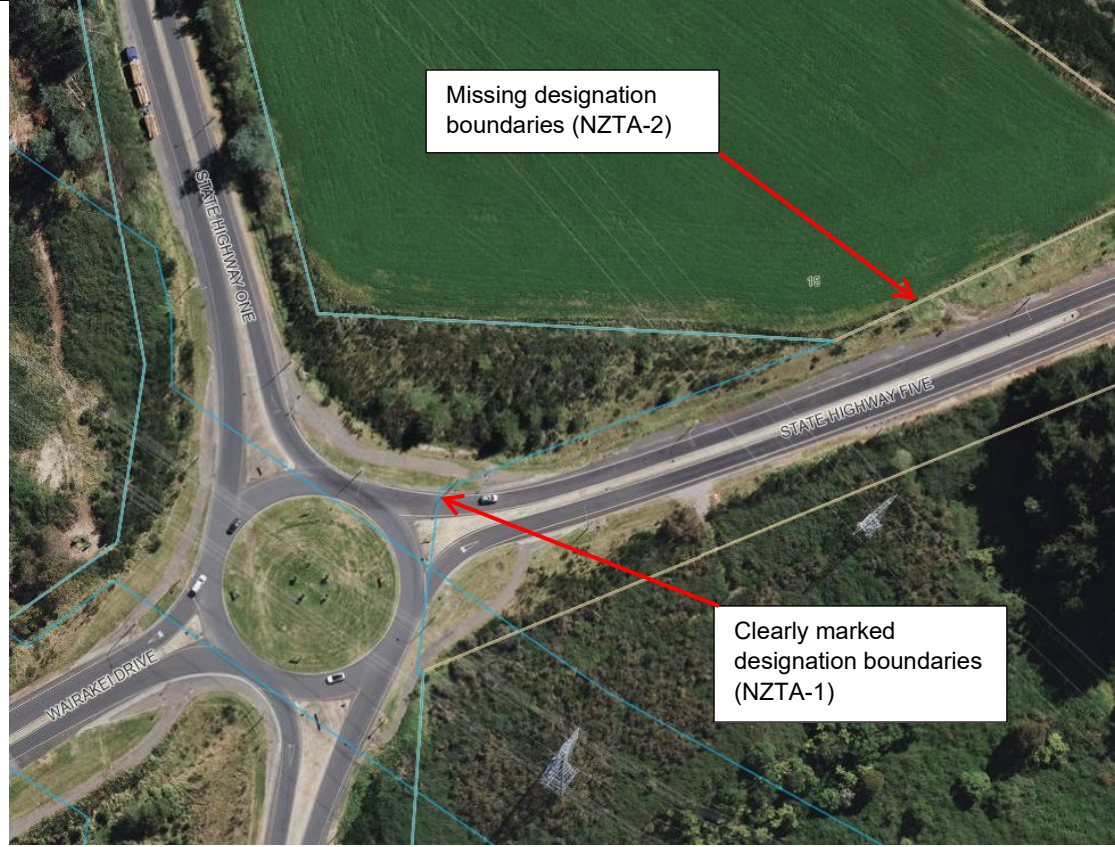
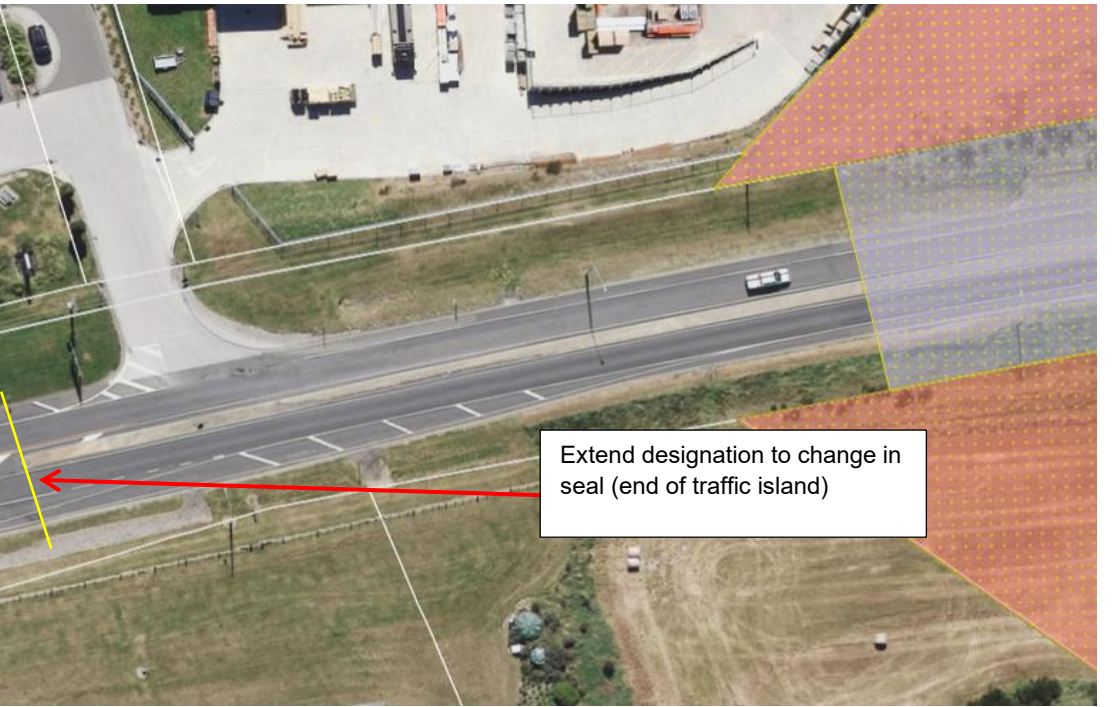
Property address / Parcel ID	Nature of relief	Proposed NZ Transport Agency Waka Kotahi designations, as notified in the Taupō Proposed District Plan Changes 47-49 (19 February 2026)	Relief Requested
Parcel ID: 4587353	Extend the proposed state highway designation to 5m from the western edge of the SH1 bridge, and on road reserve containing wingwall supporting SH1 bridge, as marked. As standard practice, NZTA maintains a designation width of at least 5m beyond the edge of NZTA bridges and structures to enable the operation, maintenance and improvement of the asset.		
Parcel ID: 7171357	Extend the proposed state highway designation to 10m from the limit line, on the western side of SH1, on 5 "Mile Bay", as marked.		

Property address / Parcel ID	Nature of relief	Proposed NZ Transport Agency Waka Kotahi designations, as notified in the Taupō Proposed District Plan Changes 47-49 (19 February 2026)	Relief Requested
Parcel ID: 4411222	Remove designation D67 over Parcel 4411222, as it has lapsed, as per the NZTA 26 February 2025 rollover notice and GIS shapefiles.		
Parcel ID: 4481888 4318580 4562586	Remove designation D72 over Parcel 4481888, 4318580, and 4562586 because it has lapsed, as per the NZTA 26 February 2025 rollover notice and GIS shapefiles.		

Property address / Parcel ID	Nature of relief	Proposed NZ Transport Agency Waka Kotahi designations, as notified in the Taupō Proposed District Plan Changes 47-49 (19 February 2026)	Relief Requested
Parcel ID: 7223747	Snap the proposed state highway designation back to the legal road parcel boundary of SH1, as marked. More detail is provided below.		
Parcel ID: 7223747	Snap the proposed state highway designation back to the legal road parcel boundary of SH1, as marked.		

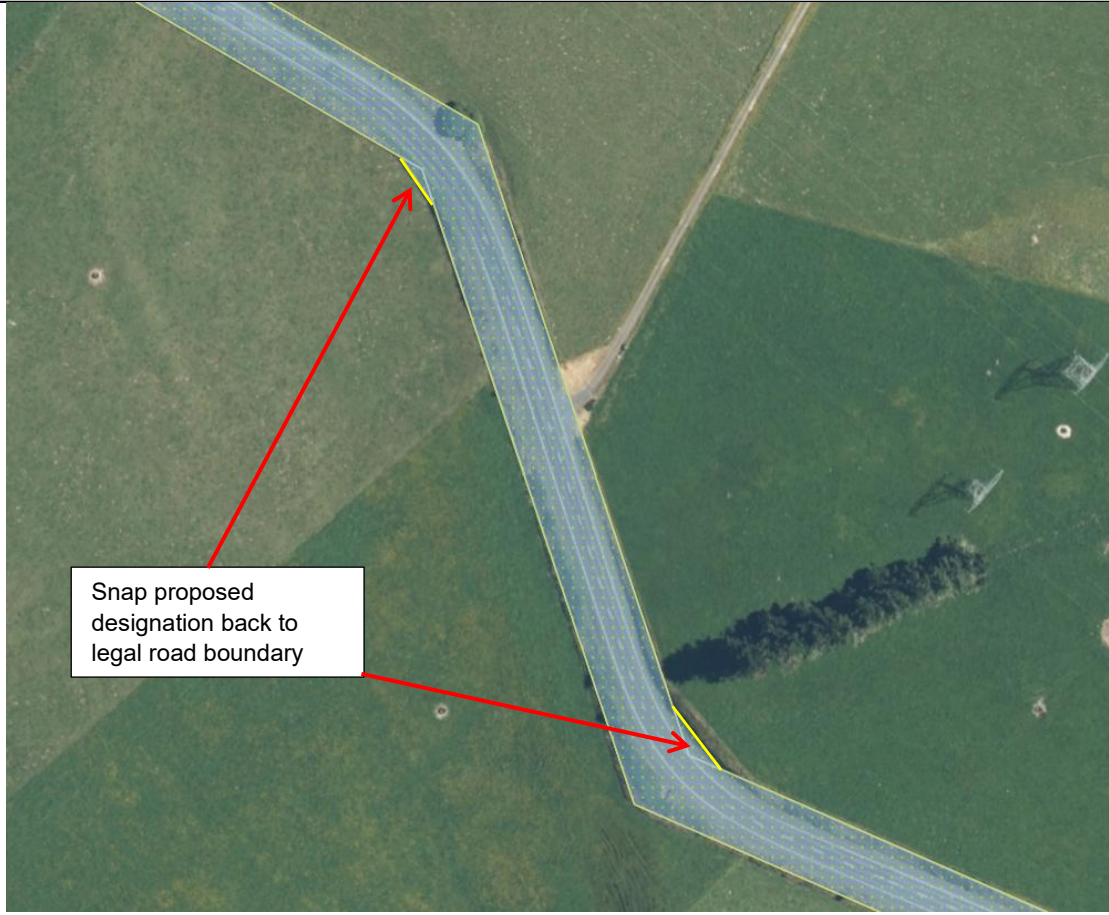
Property address / Parcel ID	Nature of relief	Proposed NZ Transport Agency Waka Kotahi designations, as notified in the Taupō Proposed District Plan Changes 47-49 (19 February 2026)	Relief Requested
Parcel ID: 7223746	Snap the proposed state highway designation back to the legal road parcel boundary of SH1, as marked.		

NZTA-2 (State Highway 5)

Property address / Parcel ID	Nature of relief	Proposed NZ Transport Agency Waka Kotahi designations, as re-notified in the Taupō Proposed District Plan Changes 47-49 (19 February 2026)	Relief Requested
Varies	To map NZTA-2 (SH5) in the Taupō District Plan as per the NZTA 26 February 2025 rollover notice and GIS shapefiles.		
Parcel ID: 8579586	To extend NZTA-2 (SH5) to the end of the existing traffic island/change of seal at the western end of SH5 on Napier Road (LINZ parcel 8579586), as marked.		

NZTA-3 (State Highway 30)

Property address / Parcel ID	Nature of relief	Proposed NZ Transport Agency Waka Kotahi designations, as re-notified in the Taupō Proposed District Plan Changes 47-49 (19 February 2026)	Relief Requested
Parcel ID: 4327488	Snap the proposed state highway designation back to the legal road parcel boundary of SH30, as marked.		
Parcel ID: 4327488	Snap the proposed state highway designation back to the legal road parcel boundary of SH30, as marked.		

Property address / Parcel ID	Nature of relief	Proposed NZ Transport Agency Waka Kotahi designations, as re-notified in the Taupō Proposed District Plan Changes 47-49 (19 February 2026)	Relief Requested
Parcel ID: 4477110	Snap the proposed state highway designation back to the legal road parcel boundary of SH30, as marked.		

NZTA-7 (State Highway 47)

Property address / Parcel ID	Nature of relief	Proposed NZ Transport Agency Waka Kotahi designations, as re-notified in the Taupō Proposed District Plan Changes 47-49 (19 February 2026)	Relief Requested
Parcel ID: 7174480	Snap the proposed state highway designation back to the legal road parcel boundary of SH47, as marked.		

PC 49 - Minor Corrections (2026)



Submitter Details

Submission Date: 19/03/2026
First name: Christle **Last name:** Pilkington
Organisation: Taupo District Council
Preferred method of contact Email
Postal address: 30 Tongariro Street, Taupō, New Zealand, 3330
Email: districtplan@taupo.govt.nz
Daytime Phone: 073760899

Trade competition and adverse effects: *

I could not **Gain an advantage in trade competition through this submission**

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

a. adversely affects the environment, and

I am not **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

1. Provision: 7.3 TRAN - Transport > TRAN-R8.9 - Vehicle Crossing Requirements

I seek an amendment to the provision

The decision I seek is (please state the exact amendment you seek or state that you wish the proposed provision to be retained)::

Amend the provision to include the rural lifestyle zone (RLZ).

The reason for my submission is::

The correction as proposed only applies to the General Rural Zone, and there are no vehicle crossing requirements applying to the Rural Lifestyle Zone.

2. Provision: Section 32

I seek an amendment to the provision

The decision I seek is (please state the exact amendment you seek or state that you wish the proposed provision to be retained)::

1. The Plan contains an interchangeable reference to the noise control overlay imposed alongside the State

Highway in rural zones, with reference to the "Noise Control Boundary Overlay" and "Noise Corridor Boundary Overlay". Amend the rule to refer only to the Noise Control Boundary Overlay, which is consistent also with references to the overlay in General Rural and Rural Lifestyle Zone chapters.

2. Move TEMP-R4- PER activities Temporary Signage to Chapter 12.7 Signs, to improve legibility of the Plan and keep all sign-related provisions in one place.

3. Remove Rule ENGY-R3.6, which was included to replace Rule 4d..1.ii when converting the District Plan into National Planning Standards format. The same provisions were replicated elsewhere in GIZ-R8, HIZ-R5, and EW-R1.8 so would not be missing from the Plan should ENGY-R3.6 be removed.

4. Include earthworks exclusion for earthworks associated with Geothermal Electricity Generation in Rule EW-R1.9 as follows (additions sought in bold/underline): Earthworks within GIZ-PREC1- Taupō and HIZ-PREC1-Taupō and HIZ- PREC2-Centennial, except areas of the GIZ associated with Geothermal Electricity Generation shown on the Planning Maps where no standards apply – being Wairakei, Poihipi, Rotokawa, Mokai, Ohaaki and Tauhara.

5. The National Grid Line and associated buffer is shown incorrectly on the Planning Maps. Update Planning Map to align with Transpower's designations, notably north of the intersection between Poihipi Road and Tuhingamata Road.

6. Insert text as follows: "". This is to replace text that was inadvertently removed from the Plan through Plan Change 42.

7. Update the District Plan maps to remove the Unserved Residential Area layer from properties that are now serviced by public infrastructure.

8. Amend SIGN-R1.5 to remove "and TCZ-PREC2-Turangi", and SIGN-R1.9 to include "GIZ-PREC1 – Taupo".

The reason for my submission is::

Amend Table 1 in Section 3 of the report to include additional corrections. Consequential amendments to Plan Change material to incorporate the amendments sought.



Fig 1. Napier Road



Fig 2. Tauhara Ridge Drive/Moa Lane



Fig 3. Richmond Avenue



Fig 4. EUL



Fig 5. Nga Roto Estate

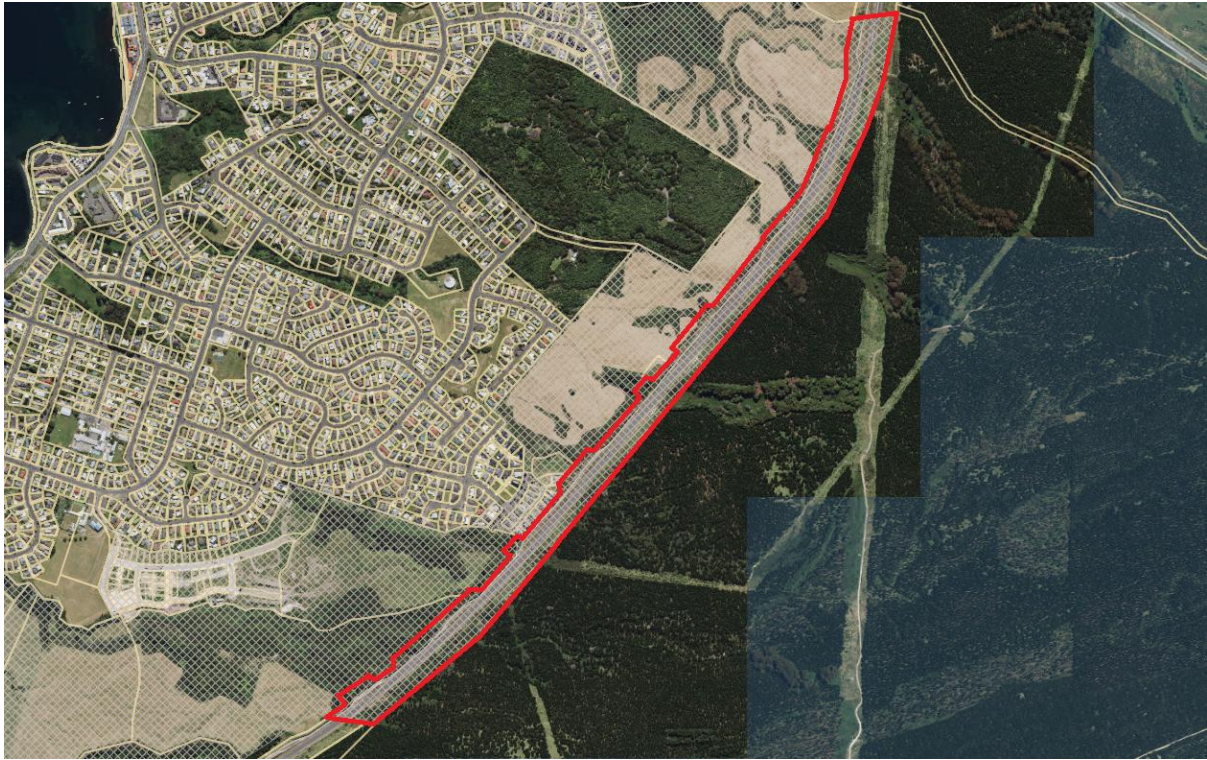


Fig 6. East Taupō Arterial



Fig 7. Loch Views Road

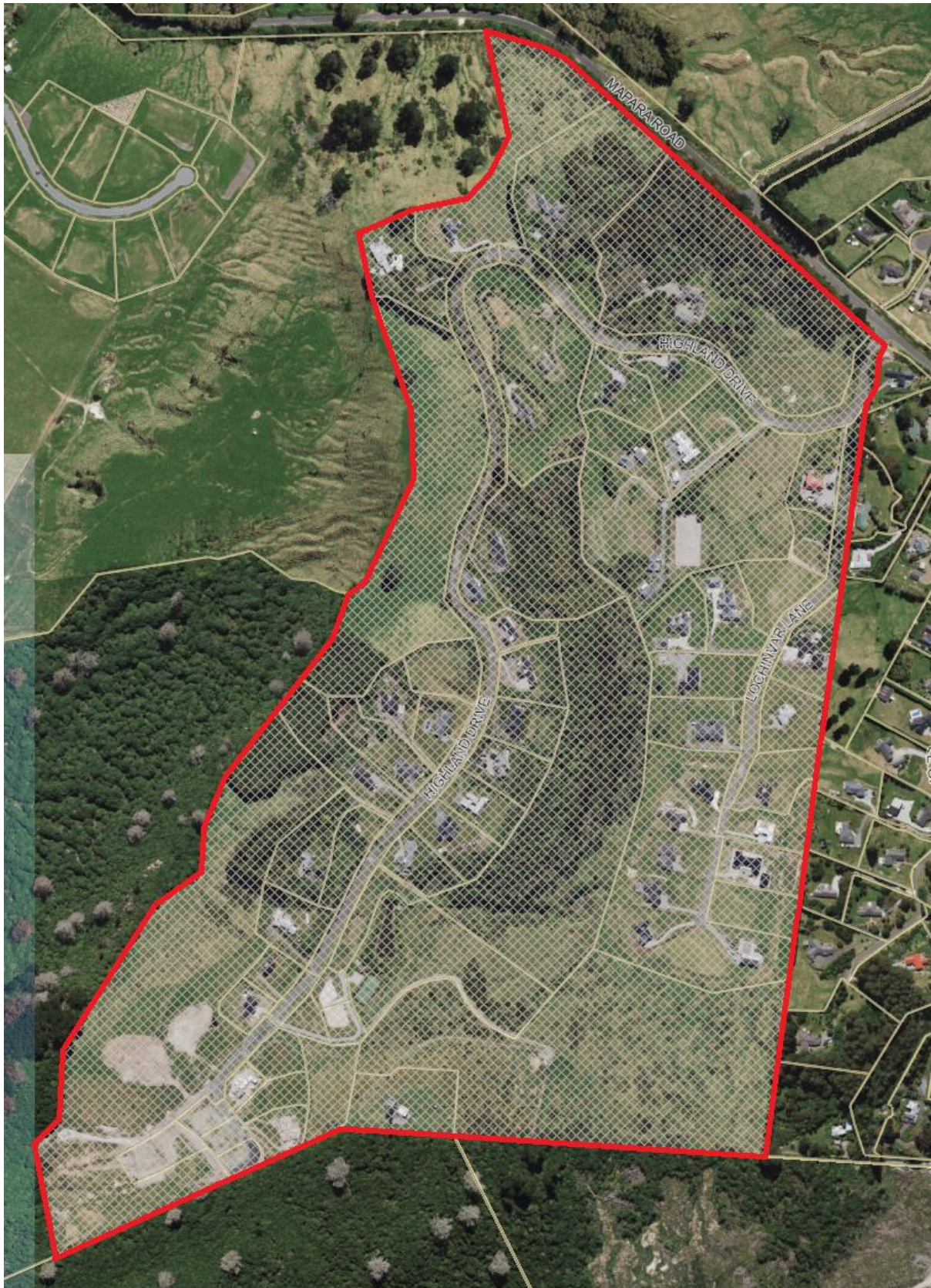


Fig 8. Highland Drive



Contact Energy Limited
Submissions on Plan Change 49
to the Taupō District Plan
Minor Corrections

Date: 19 March 2026

To: Taupō District Council

Submitter: Contact Energy Limited

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- Contact Energy Ltd (Contact) wishes to be heard in support of this submission.
- Contact could not gain an advantage in trade competition through this submission.
- If others make a similar submission, Contact would consider presenting a joint case with them at any hearing.

1. INTRODUCTION

- 1.1. Contact Energy Limited (**Contact**) welcomes the opportunity to submit on Proposed Plan Change 49 (**PC49**) to the Taupō District Plan.

2. CONTACT ENERGY LIMITED

- 2.1. Following the recent acquisition of Manawa Energy (formerly TrustPower), Contact owns and operates 38 power stations across the country and currently produces 97% of its electricity from renewable hydro and geothermal resources.
- 2.2. Contact is New Zealand's largest producer of renewable electricity from geothermal resources with the operation of its Wairākei A & B Power Station, Wairākei Binary Plant, Poihipi Road, Te Mihi, Ohaaki, Te Huka and Tauhara Power Stations (all located in the Taupō District).

3. SUBMISSION

- 3.1. Contact's submissions in relations to specific aspects of PC49 are as follows:

12.2 AIR – Air Emissions

- 3.2. PC49 seeks to change the status of an activity under Rule 12.2 from Restricted Discretionary Activity to Discretionary Activity.
- 3.3. Contact submits that Rules AIR-R1 and AIR-R2 are an unnecessary duplication of the same rules which appear in the Waikato Regional Plan. Specifically, Rule 6.1.8 in the Waikato Regional Plan requires that: "The discharge shall not result in odour that is objectionable to the extent that it causes an adverse effect at or beyond the boundary of the subject property" which is precisely the same outcome required by Rule AIR-R1 (and which any breach of that standard triggers the need for a resource consent under Rule AIR-R2). On that basis, rather than amend the rules, Contact is of the view that Rules AIR-R1 and AIR-R2 should be deleted (and as a consequence, so should Rule AIR-R3 be deleted).
- 3.4. If Rule AIR-R2 is to be retained in the Taupō District Plan, then it should remain as a Restricted Discretionary Activity. There is no reason why a breach of an air quality standard should result in the need for a full assessment of effects as a Discretionary Activity including potentially matters such as traffic and noise effects.
- 3.5. If one of the above outcomes are not adopted by TDC (and it becomes a Discretionary Activity), Contact is of the view that the rule needs to be further amended in two respects as follows:
 - i. The rule currently refers to "Any activity which does not comply with one or more of the standards for PER activities." It is not clear as to which PER standards are being referred to. It is Contact's interpretation that Rule AIR-R2 is referring Rule AIR-R1 (which should be the case rather than any other PER rules in the District Plan) but that is not clear. The situation is further confused by the reference to "PER standards" in the plural when Rule AIR-R1 only has one standard.
 - ii. While the status of activities under Rule AIR-R2 are being changed from Restricted Discretionary Activity to Discretionary Activity, the rule as proposed in PC49 retains the following which would then falsely imply that the activity status is a Restricted Discretionary Activity (and that any application under the rule should be assessed as such):

Matters of Discretion

Restricted to only the matters of non-compliance specified in that standard

The above is appropriate in the context of a Restricted Discretionary Activity but not for a Discretionary Activity.

12.5 LIGHT – Light

- 3.6. While the effects of lighting more squarely fall with the jurisdiction of TDC (compared to air discharges discussed above), Rules LIGHT-R2 and LIGHT-R3 suffer from the same issues noted above in relation to the AIR rules. Contact notes the same concerns and seeks similar relief (see Section 4 below).

4. RELIEF SOUGHT

- 4.1. Contact seeks the following relief:

Section 12.2 AIR – Air Emissions

- 4.2. As a first preference, delete Rules AIR-R1, AIR-R2 and AIR-R3.
- 4.3. As a second preference, amend Rule AIR-R2 as follows (including retaining it as a Restricted Discretionary Activity):

AIR-R2 RDIS activities within RESZ, NCZ, TCZ, GIZ, HIZ	
1. Any activity which does not comply with one or more of the standards for PER activities <u>in Rule AIR-R1</u> .	Matters of Discretion Restricted to only the matters of non-compliance specified in that standard

As a third preference, amend Rule AIR-R2 as follows:

AIR-R2 RDIS activities within RESZ, NCZ, TCZ, GIZ, HIZ	
2. Any activity which does not comply with one or more of the standards for PER activities <u>in Rule AIR-R1</u> .	Matters of Discretion Restricted to only the matters of non-compliance specified in that standard

12.5 LIGHT – Light

- 4.4. As a first preference, do not amend Rules LIGHT-R2 and LIGHT-R3 (i.e. keep them as Restricted Discretionary Activities).
- 4.5. As a second preference, amend Rules LIGHT-R2 and LIGHT-R3 as follows:

LIGHT-R2 RDIS activities within MRZ, GRZ, LRZ, MUZ, NCZ	
1. Any activity which does not comply with one or more of the standards for PER activities <u>in Rule LIGHT-R1</u> .	Matters of Discretion Restricted to only the matters on non-compliance specified in that standard
LIGHT-R3 RDIS within GIZ-PREC1-Taupō-Light Overlay	
1. Any activity which does not comply with the standards <u>in Rule LIGHT-R1</u>	Matters of Discretion LIGHT-R5 for GIZ-PREC1-Taupō-Light Overlay

and is not otherwise identified as a CON or DIS activity	
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Dated: 19 March 2026

Contact Energy Limited by its duly authorised agent:

Mitchell Daysh Limited



Mark Chrisp