



First name: Jen

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On behalf of:

Turangi Riverside Area Preservation Group

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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?

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

Attached Documents

File
Submission from TRAP-G 4 November 2022

Submission to Taupo District Council on District Plan Change 38 - Strategic Directions

The Turangi Riverside Area Preservation Group ('the Group') submits as follows:

The Group is made up of approximately 76 owners of property in the Turangi riverside area between state Highway 1 and the Tongariro River. The Group's focus is on preservation and protection of the Turangi Riverside residential area, making several points in Plan Change 38 - Strategic Directions, the most relevant ones for the Group to submit on. The Group has been guided by Council's statement that

the strategic directions will be particularly relevant for any future changes to the Plan and any significant resource consent applications where there is a requirement to consider District Plan policy.

1. The Group supports Plan Change 38 2.3.2 point 7, and 2.3.3 points 10 and 12.

- 2.3.2 7. Subdivision is designed to avoid, remedy or mitigate adverse effects on the environment and occurs in a sequenced and coherent manner that protects or enhances the important natural values of the environment where it is located.
- 2.3.3. 10. Manage subdivision use and development of land to ensure that it will not:
 - a. have an adverse effect on the functioning of the environment where it is located,
 - b. unduly conflict with existing activities on adjoining properties,
 - c. compromise development consistent with the intent and planned urban built form of the environment where it is located
 - d. give rise to reverse sensitivity effects from existing uses
- 2.3.3. 12. Do not support subdivision and development which will inappropriately affect heritage sites or areas of important natural and landscape values.

2. The Group supports 2.6.2.

The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna from the adverse effects of inappropriate development.

3. The Group acknowledges that the overall context of Plan Change 38 is Taupo District 2050 which implies that Taupo Town Centre is the District's only town centre, but nevertheless the Group has concerns about 2.3.3 point 8:

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 the planned urban built form of residential neighbourhoods.

- a. 2.3.3. 8 appears to refer only to Taupo Town Centre, rather than to all town centres in the Taupo District.
- b. The Group therefore submits that the key concept in Plan Change 38 of consolidating, and intensifying commercial activities while protecting "the planned urban built form of residential neighbourhoods" should apply to the District as a whole.

4. In light of the Group's submission point 3b above, the Group seeks an amendment to 2.3.3. 8, to make reference to all town centres in District. The Group suggests:

Maintain strong boundaries to the District's town centres to consolidate and intensify retail, commercial and office activities within them and protect the planned urban built form of residential neighbourhoods.

(The Group's November 2022 submission ends.)

The Group's June 2022 submission is appended, for reference.

For reference, the submission the Group made in June 2022 is as follows:

Strategic Directions (full replacement of the Significant Resource Management Issues Chapter):

The Group submits that Taupo District Council 's Strategic Directions must

- protect Lake Taupo and the rivers in our District from contaminated and toxic run-off
- protect the amenity of residential neighbourhoods.

With those two over-arching points in mind, t he Group supports the Strategic Directions draft as follows, except as noted below:

SD2 Freshwater quality

2.2.3 Policy

4. Recognise the benefits of subdivision, land-use and development activities which will directly contribute to the enhancement of freshwater quality.

SD3 Urban form and development

2.3.2. Objectives

5. Subdivision, use and development will not detract from the wider character and effective functioning of the environment in which it is located.

2.3.3 Policy

5. Support subdivision, use and development of land that will lead to beneficial social and cultural outcomes for the District's community.

7. Maintain strong boundaries to the town centre to consolidate and intensify retail, commercial and office activities within the city centre and protect the amenity of residential neighbourhoods.

Note: The Group assumes that "town centre" refers to all town centres in the District, not only Taupo Town Centre. This needs to be spelt out in the finalised document.

9. Manage subdivision use and development of land to ensure that it will not:

a. have an adverse effect on the functioning of the environment where it is located

Note: the concept of "functioning" needs specificity. The Group is concerned that notions of efficiency and convenience of functioning in any given environment could work against protection of the amenity of residential neighbourhoods. We submit that adding the word "nature" in 9 above would assist at this stage, as in "nature and functioning of the environment".

b. unduly conflict with existing activities on adjoining properties

c. compromise development consistent with the intent of the environment where it is located

d. give rise to reverse sensitivity effects from existing uses.

10. Require the design and location of activities to avoid or mitigate natural hazards to an acceptable level of risk to life, property and the environment.

(The Group's June 2022 submission ends)



First name: Lucy

Last name: Edwards

On behalf of:
New Zealand Defence Force

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Suburb:

City: Wellington

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Daytime Phone: 021 934270

- 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 - New Zealand Defence Force - District Plan Submission



Submission on Taupō District Plan Changes 38-43

Clause 6 of First Schedule, Resource Management Act 1991

To: Taupō District Council
Attention: District Plan Review – Team Leader

Email: districtplan@taupo.govt.nz

Feedback provided by: New Zealand Defence Force
Contact Person: Lucy Edwards, Senior Environmental Officer

Address for Service: New Zealand Defence Force
 C/- Tonkin & Taylor Ltd
 PO Box 2083
 Wellington 6140

Mobile: +64 21 934 270
Email: Lucy.Edwards@nzdf.mil.nz / AGifford@tonkintaylor.co.nz

This is a submission on Taupō District Council's (TDC) proposed plan changes 38-43. The proposed changes include a new Strategic Directions chapter, new General Rural and Rural Lifestyle Environment chapters, changes to the residential building coverage rule, additional industrial land zoning and a review of the building height limits and the temporary activities rule within the Town Centre Environment chapter.

The New Zealand Defence Force (NZDF) has military interests throughout New Zealand. While NZDF does not currently operate any facilities within the Taupō District, this does not preclude the potential for NZDF to need to establish new facilities in the district in the future.

NZDF may also undertake temporary military training activities (TMTA) in the district from time to time. NZDF undertakes TMTA across the country as part of its function of maintaining its operational capacity and nation's security, as well as providing for the well-being, health and safety of communities.

Within the General Rural and Rural Lifestyle Environments and Town Centres chapters, the proposed rules for temporary activities (reference 4b.1.3, 4b.3.5 and 4g.2.2, respectively) do not distinguish between TMTA and other temporary activities such as concerts and sports events. TMTA are uniquely military in nature and therefore it is appropriate for District Plans to include specific TMTA provisions to address their effects. A detailed submission is attached.

NZDF has previously provided feedback and information to TDC in 2019, 2020 and 2022. The latest feedback is provided in Attachment C. Unfortunately, this has not been reflected in the proposed plan.

NZDF **could not gain** an advantage in trade competition through this submission. NZDF wishes to be heard in support of this submission.

If others make a similar submission, **we will consider** presenting a joint case with them at the hearing.



Person authorised to sign
on behalf of New Zealand Defence Force

Date 15 November 2022

Attachment A: Detailed submission

Deletions are marked with ~~strikethrough~~ and additions with underline.

Point	Provision	Support/ Oppose / Amend	Reasons	Relief sought
<i>Plan Change 38 – Strategic Directions</i>				
1.	Objectives 2.5.2.1 and 2.5.2.3	Support	It is appropriate that the Plan provisions provide direction that the benefits of nationally and regionally significant infrastructure are to be recognised and provided for.	Retain objectives as notified.
2.	Policy 2.5.3.3 and 2.5.3.4		As above.	Retain policy as notified.
<i>Plan Change 40 – Taupō Town Centre</i>				
3.	Town Centre Environment Policy iii.	Amend	A permitted activity rule specific to TMTA is requested in point 5 below. The policy framework should enable TMTA and support the requested permitted activity rule.	Town Centre Environment Policy iii. To recognise the important role of the Tongariro Domain and its existing infrastructure and services (including those provided by commercial operators) as resources that support the wider town centre environment and contribute to the economic and social wellbeing of the district by: a. enabling a diverse range of temporary activities, <u>including Temporary Military Training Activities</u> , given the nature and frequency of these activities and taking into account the amenity of the surrounding environment; and b. providing recreation and commercial opportunities.
4.	Town Centre Environment Rule 4g.2.2	Oppose	The operative District Plan and proposed changes do not differentiate between temporary activities, such as sporting events and TMTA. TMTA are uniquely military in nature and therefore it is appropriate for District Plans to include specific TMTA provisions to address their effects. This is supported by	Include a new permitted activity rule specific to TMTA with the wording set out below (noting the standards would ideally sit within the District Wide Performance standards, however this is outside the scope of this plan change)

Point	Provision	Support/ Oppose / Amend	Reasons	Relief sought
			<p>the National Planning Standards which includes a specific definition of “temporary military training activity” as distinct from temporary activities.</p> <p>NZDF’s requested provisions for TMTA have been incorporated into the operative planning documents for a number of territorial authorities (with or without minor modifications), including the South Taranaki, Horowhenua, South Waikato, Rotorua, Napier, Southland, and Whangarei District Councils as well as the Auckland Unitary Plan. Further, some councils such as the Thames-Coromandel and Queenstown Lakes District Councils have decided not to regulate TMTA at all in their District Plans on the basis that the activity does not warrant a regulatory approach.</p>	<p><u>4g.2.3 Any Temporary Military Training Activities</u> are a <u>permitted activity</u>, provided that:</p> <ol style="list-style-type: none"> <u>The duration is limited to a period of 31 days, excluding set-up or pack-down activities, which can occur up to one week prior to commencement and up to one week following completion of the temporary military training activity.</u> <u>Compliance with the following noise standards [refer to Attachment B of this letter for complete noise standards]</u> <ol style="list-style-type: none"> <u>Weapons firing and/or the use of explosives [...]</u> <u>Mobile noise sources [...]</u> <u>Fixed (stationary noise sources [...])</u> <u>Helicopter landing areas [...]</u> <p>Alternatively, the following wording could be incorporated into the existing rule 4g.2.2:</p> <p>Any temporary activity, being an activity of up to a total of three four operational days in any one calendar year six-month period, <u>or a temporary military training activity up to 31 consecutive days, which exceeds any performance standard(s), is a permitted activity, provided that:</u></p>
6.	None.	Amend	<p><i>Plan Change 42 – General Rural and Rural Lifestyle Environments</i></p> <p>The general rural and rural lifestyle environment chapters contain permitted activity rules for temporary activities, but no supporting objectives and policies.</p>	<p>Include the following new objective, or words to similar effect:</p>

Point	Provision	Support/ Oppose / Amend	Reasons	Relief sought
				<u>Temporary activities enhance and contribute to community connectedness, a vibrant district and the social, environmental, economic and cultural well-being of communities.</u>
7.	None.	Amend	As above.	Include the following new policy, or words to similar effect: <u>Allow temporary activities provided that their effects are appropriately managed.</u>
8.	General Rural Environment rule 4b.1.3	Oppose	As outlined in submission point 5.	Include a new permitted activity rule specific to TMTA using the wording and approach sought in submission point 5.
9.	Rural Lifestyle Environment rule 4b.3.5	Oppose	As outlined in submission point 5.	Include a new permitted activity rule specific to TMTA using the wording and approach sought in submission point 5.

Attachment B: TMTA permitted activity rule noise standards

Rule X: Temporary Military Training Activities are permitted activities provided they comply with the following noise standards:

1. Weapons firing and/or the use of explosives

- a. Notice is provided to the Council at least 5 working days prior to the commencement of the activity.
- b. The activity complies with the following minimum separation distances to the notional boundary of any building housing a noise sensitive activity:
 - 0700 to 1900 hours: 500m
 - 1900 to 0700 hours: 1,250m
- c. Where the minimum separation distances specified above cannot be met, then the activity shall comply with the following peak sound pressure level when measured at the notional boundary of any building housing a noise sensitive activity:
 - 0700 to 1900 hours: 95 dBC
 - 1900 to 0700 hours: 85 dBC

2. Mobile noise sources

Shall comply with the noise limits set out in Tables 2 and 3 of *NZS6803:1999 Acoustics – Construction Noise*, with reference to ‘construction noise’ taken to refer to mobile noise sources*.

Note: Mobile noise sources (other than firing of weapons and explosives) include personnel, light and heavy vehicles, self-propelled equipment, earthmoving equipment.

3. Fixed (stationary) noise sources

Shall comply with the noise limits set out in the table below when measured at the notional boundary of any building housing a noise sensitive activity*.

Time (Monday to Sunday)	L _{Aeq} (15 min)	L _{AFmax}
0700 to 1900 hours	55 dB	n.a.
1900 to 2200 hours	50 dB	
2200 to 0700 hours the next day	45 dB	75 dB

Note: Fixed (stationary) noise sources (other than firing of weapons and explosives) include power generation, heating, ventilation or air conditioning systems, or water or wastewater pumping/treatment systems.

4. Helicopter landing areas

Shall comply with NZS6807:1994 Noise Management and Land Use Planning for Helicopter Landing Areas*.

* Noise levels shall be measured in accordance with NZS6801:2008 Acoustics – Measurement of Sound.

Attachment C: Previous Feedback



New Zealand Defence Force
 Defence Estate and Infrastructure
 NZDF Headquarters
 Private Bag 39997
 Wellington 6045

Taupō District Plan Review: Draft Plan Changes

To: Taupō District Council
Attention: District Plan Review – Team Leader

Feedback provided by: New Zealand Defence Force
Contact Person: Lucy Edwards, Senior Environmental Officer

Address for Service: New Zealand Defence Force
 C/- Tonkin & Taylor Ltd
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1. Introduction

The Taupō District Council (TDC) is undertaking a partial review of the Taupō District Plan. NZDF understands that a partial review is being undertaken due to the uncertainty of the upcoming reform to New Zealand's resource management system and replacement of the Resource Management Act 1991.

In 2019 TDC prepared an "issues identification" document for feedback from key stakeholders. In September 2019 NZDF provided feedback on the document and in September 2020 NZDF provided further details on Temporary Military Training Activities (TMTA) and requested that they be provided for as a permitted activity within the District Plan on a district-wide basis. A copy of this previous feedback is included as Attachment A.

TDC has recently released, in draft, the details of the partial plan review. The draft includes a new Strategic Directions chapter, a new Rural Environment chapter, changes to the residential building coverage rule, additional industrial land zoning and a review of the building height limits and the temporary activities rule within the Town Centre Environment chapter.

This letter provides NZDF's feedback on the draft District Plan provisions.

2. Background to NZDF and Temporary Military Training Activities

NZDF's previous feedback (Attachment A) details the importance of TMTA. TMTA are a critical component of ensuring that NZDF meets its responsibilities under the Defence Act 1990. Therefore, it is important that they are provided for within District Plans.

NZDF has successfully worked with a large number of other local authorities to include specific TMTA provisions in their District Plans (including the Horowhenua District Plan,

South Waikato District Plan, Southland District Plan, Whangarei District Plan, Auckland Unitary Plan and Rotorua Lakes District Plan).

3. Feedback on draft Taupō District Plan provisions

Due to the broad nature of TMTA and the need for NZDF to train in unfamiliar real-world situations, TMTA may need to be undertaken in any zone within a district. NZDF's interest in the current suite of draft plan changes therefore relates to the Rural Environment and Town Centres chapters.

Within the Rural Environment and Town Centres chapters, the draft rule for temporary activities (reference 4b.1.3 and 4g.2.2, respectively) does not distinguish between TMTA and other temporary activities such as concerts and sports events. TMTA are uniquely military in nature and therefore it is appropriate for District Plans to include specific TMTA provisions to address their effects. This is supported by the National Planning Standards which includes a specific definition of "temporary military training activity" as distinct from temporary activities.

NZDF requests that TMTA are provided for as a permitted activity within the Rural Environment and Town Centres Chapters via a TMTA specific rule. The requested rule wording is provided in Appendix C of Attachment A to this letter. Objectives and policies that support the temporary activity rules, including TMTA, should also be included within the Rural Environment and Town Centres chapters.

4. Conclusions and next steps

NZDF looks forward to further discussion with TDC on these matters, with a view to ensuring appropriate provisions for TMTA and other matters of importance to NZDF are included in the review of the Taupō District Plan.



Person authorised to sign
on behalf of New Zealand Defence Force

Date 9 June 2022

Attachment A: TMTA information



New Zealand Defence Force
 Defence Estate and Infrastructure
 Level 6 Reserve Bank
 NZDF Headquarters
 Private Bag 39997
 Wellington 6045

Taupo District Plan Review: Further Information on Temporary Military Training Activities

To: Taupo District Council
Attention: Temi Allinson

Feedback provided by: New Zealand Defence Force
Contact Person: Rebecca Davies, Senior Planner, Environmental Services

Address for Service: New Zealand Defence Force
 C/- Tonkin & Taylor Ltd
 PO Box 2083
 Wellington 6140

Mobile: +64 21 445 482
Email: rebecca.davies@nzdf.mil.nz / AGifford@tonkintaylor.co.nz

1. Introduction

New Zealand Defence Force (NZDF) understands that the Taupo District Council (TDC) is in the early stages of reviewing its District Plan. Although no formal Plan Change documentation is currently available, in 2019 TDC prepared an “issues identification” document for feedback. In September 2019 NZDF provided feedback on the document and requested further engagement with TDC during the plan review process.

As discussed with you on 15 September 2020, we understand that TDC would like further information on Temporary Military Training Activities (TMTA) and how they may be included within the proposed District Plan. This letter provides information on TMTA, requests TMTA are provided for within the proposed District Plan and sets out the provisions that NZDF seeks for inclusion in the District Plan.

2. Background to NZDF and TMTA

NZDF has military interests throughout New Zealand. While there are no NZDF facilities within the Taupo District, NZDF undertakes TMTA throughout New Zealand and from time to time it may need to undertake TMTA in the District.

TMTA are a critical component of ensuring that NZDF meets its responsibilities under the Defence Act 1990. They are undertaken as part of NZDF’s function of maintaining the nation’s security, maintaining NZDF operational capacity and providing for the well-being, health and safety of communities. TMTA can include a range of activities, from office/classroom based activities to large scale military exercises, and might involve search and rescue, infrastructure support (such as deployment of water purification and supply facilities as used in the aftermath of the Canterbury earthquakes), bomb deactivation training,

weapons firing, personnel etc. They may be undertaken over a period of days or weeks, on an intermittent or continuous basis, and during both day and night.

It is important to note that the use of weapons and explosives training is only one component of TMTA and that there is a broad range of activities undertaken by NZDF on a day-to-day or regular basis, or only intermittently. While TMTA can occasionally have some unique characteristics, most notably the noise effects of weapons firing and the use of explosives, the actual effects of most TMTA are similar to the effects of other, non-military, day-to-day activities.

Further information on TMTA is provided in Appendix A.

3. Requested plan provisions

As some of the activities undertaken as TMTA are uniquely military in nature, they often are not clearly addressed by other rules in district plans. Therefore, NZDF's preference is for district plans to include specific TMTA provisions to address their effects. NZDF has successfully worked with a large number of other local authorities to include specific TMTA provisions in their District Plans (including the Horowhenua District Plan, South Waikato District Plan, Southland District Plan, Whangarei District Plan, Auckland Unitary Plan and Rotorua Lakes District Plan). Accordingly, NZDF provides the following comments on proposed provisions for the Taupo District Plan.

3.1. Definition of TMTA

The first set of National Planning Standards included a definition for TMTA. This definition should therefore be included within the proposed District Plan (refer to Appendix B for the definition).

3.2. Location within the District Plan

Due to the broad nature of TMTA and the need for NZDF to train in unfamiliar real-world situations, they may need to be undertaken in any zone within a district. Therefore, it is important to NZDF that TMTA are provided for in all zones in a district plan. As such, NZDF request that the provisions for TMTA are included in the 'General Activities' chapter that applies to every zone in the district.

3.3. Activity status

NZDF requests that TMTA be provided for as a permitted activity under the proposed District Plan, subject to appropriate standards. Due to the temporary and sometimes specialised nature of TMTA, NZDF considers that a permitted activity standard for noise is all that is required to address the effects of TMTA.

NZDF requests that TMTA that do not meet the permitted activity standards are provided for as a controlled activity, as NZDF must undertake training in order to fulfil its statutory obligations under the Defence Act. Therefore, controlled activity status provides certainty to NZDF that TMTA can proceed and allows Council a suitable level of control to ensure effects are appropriately managed. In determining what conditions to impose, Council should limit its control to effects relating to the permitted activity standards only (i.e. noise).

3.4. TMTA provision wording

The requested wording of the permitted activity rule and standards is outlined in Appendix C and an explanation for the provisions is provided in Appendix D. These provisions include noise limits relating to:

- Weapons firing and/or the use of explosives;
- Mobile noise sources;
- Fixed (stationary) noise sources; and
- Helicopter landing areas.

Note: NZDF is promoting national consistency in TMTA provisions in District Plans throughout New Zealand. To assist Councils, NZDF has engaged an acoustic consultant to develop bespoke noise standards for TMTA. These noise standards are currently being updated. We will provide the updated provisions to Council in due course, however, the provisions outlined within Appendix C provide an example of how TMTA have been included in other District Plans.

3.5. Relationship with other rules in the proposed District Plan

Due to the temporary and specialised nature of TMTA, NZDF requests that TMTA are exempt from the rules in other chapters of the proposed District Plan (e.g. transportation). If TMTA are to be subject to specific chapters or rules, such as for earthworks or permanent structures, NZDF requests that this is clearly noted in the relevant parts of the proposed District Plan.

4. Conclusions and next steps

NZDF looks forward to further discussion with TDC on these matters, with a view to ensuring appropriate provisions for TMTA and other matters of importance to NZDF are included in the review of the Taupo District Plan.

PP.



Person authorised to sign
on behalf of New Zealand Defence Force

Date 10 November 2020

Appendix A: Temporary Military Training Activities Information Sheet

The New Zealand Defence Force (NZDF) is required to undertake training activities in accordance with the Defence Act 1990.

These training activities include a wide range of activities, including: physical training, dog training, signals (radio communications) exercises, medical and dental exercises, medivac simulation, Improvised Explosive Device Disposal (IEDD) exercises, IEDD search exercises (in commercial or industrial buildings as well as outdoors), small construction tasks, camp setup, including field kitchens and ablutions, search and rescue, Civil Defence support, driver training and infrastructure support (e.g. water purification and supply facilities). NZDF also undertakes activities that are more recognisable as military exercises, including the use and firing of weapons (both live and blank ammunition) and the detonation of explosives.

A practical example of training relates to the unit that provides dental services to deployed troops. A key part of training is setting up and operating their deployable facilities in locations remote from their home base. They exercise that skill by setting up in location for a period and providing free dental care to patients who might otherwise miss out. School children in areas remote from dental services are often the beneficiaries of that training activity.

Troops also train within NZDF owned properties, military camps and bases. However, it is important that troops are trained outside of these locations to ensure the skills learned are able to be applied in new and different situations, not just in familiar areas.

Many activities are carried out “off-base” by NZDF personnel are essentially similar to training activities conducted by other public service or commercial organisations. Included in that comparison are (for example) NZ Police, NZ Fire Service, the various ambulance services, search and rescue, and specialist cliff rescue teams.

Training activities may include the use of powered machinery, vehicles or aircraft and may involve weapons firing and the use of explosives, in addition to the deployment of personnel. In some exercises weapons may be carried or set up for realism but not fired. Temporary military training activities may be undertaken over a period of days or weeks on an intermittent or continuous basis, during both day and night.

Training activities are carried out “off-base” for a variety of reasons and two of the important reasons are diversity and realism. Skills that are learned and practiced “on-base” must be tested or extended in unfamiliar contexts “off base”.

Extended “off-base” activities are costly in terms of funding and time and are not used for routine, repetitive training. An extended duration is not required to achieve the objective of testing skills in a different context. So, while an exercise might be undertaken over a period of days or weeks, typically an exercise would only take place in one locality for a period of a few days.

Appendix B: TMTA definition

The following definition for TMTA is included in the first set of National Planning Standards, and NZDF seeks that it be included in the Taupo District Plan:

Temporary military training activity: means a temporary activity undertaken for the training of any component of the New Zealand Defence Force (including with allied forces) for any defence purpose. Defence purposes are those purposes for which a defence force may be raised and maintained under section 5 of the Defence Act 1990 which are:

- a. the defence of New Zealand, and of any area for the defence of which New Zealand is responsible under any Act;
- b. the protection of the interests of New Zealand, whether in New Zealand or elsewhere;
- c. the contribution of forces under collective security treaties, agreements, or arrangements;
- d. the contribution of forces to, or for any of the purposes of, the United Nations, or in association with other organisations or States and in accordance with the principles of the
- e. Charter of the United Nations;
- f. the provision of assistance to the civil power either in New Zealand or elsewhere in time of emergency; and
- g. the provision of any public service.

Appendix C: Permitted Activity Noise Standards for Temporary Military Training Activities

Rule X: Temporary Military Training Activities are permitted activities provided they comply with the following noise standards:

1. Weapons firing and/or the use of explosives

- a. Notice is provided to the Council at least 5 working days prior to the commencement of the activity.
- b. The activity complies with the following minimum separation distances to the notional boundary of any building housing a noise sensitive activity:
 - 0700 to 1900 hours: 500m
 - 1900 to 0700 hours: 1,250m
- c. Where the minimum separation distances specified above cannot be met, then the activity shall comply with the following peak sound pressure level when measured at the notional boundary of any building housing a noise sensitive activity:
 - 0700 to 1900 hours: 95 dBC
 - 1900 to 0700 hours: 85 dBC

2. Mobile noise sources

Shall comply with the noise limits set out in Tables 2 and 3 of *NZS6803:1999 Acoustics – Construction Noise*, with reference to 'construction noise' taken to refer to mobile noise sources*.

Note: Mobile noise sources (other than firing of weapons and explosives) include personnel, light and heavy vehicles, self-propelled equipment, earthmoving equipment.

3. Fixed (stationary) noise sources

Shall comply with the noise limits set out in the table below when measured at the notional boundary of any building housing a noise sensitive activity*.

Time (Monday to Sunday)	L _{Aeq} (15 min)	L _{AFmax}
0700 to 1900 hours	55 dB	n.a.
1900 to 2200 hours	50 dB	
2200 to 0700 hours the next day	45 dB	75 dB

Note: Fixed (stationary) noise sources (other than firing of weapons and explosives) include power generation, heating, ventilation or air conditioning systems, or water or wastewater pumping/treatment systems.

4. Helicopter landing areas

Shall comply with NZS6807:1994 Noise Management and Land Use Planning for Helicopter Landing Areas*.

* Noise levels shall be measured in accordance with NZS6801:2008 Acoustics – Measurement of Sound.

Appendix D: Explanation for replacement noise standards for Temporary Military Training Activities

NZDF wishes to make sure that the noise standards included in Plans are up-to-date, appropriate for the type of noise generated and relatively simple to understand and assess compliance with. To this end, in 2018 NZDF commissioned professional acoustic advice on appropriate permitted activity standards to control noise effects from Temporary Military Training Activities (TMTA). This report can be provided on request. Based on this advice, NZDF has developed revised noise control standards that it will seek to have included in proposed plans nation-wide.

The replacement noise standards proposed by NZDF focus on compliance at dwellings, residentially zoned sites, and buildings used for residential, educational or healthcare purposes.

In summary, the NZDF's proposed standards divide noise sources from TMTA into four categories: weapons firing and explosions; other mobile sources such as vehicles and earthmoving equipment; fixed noise sources such as power generators and water pumping; and helicopter landing areas. Each of these noise sources has different noise characteristics, and therefore, a different set of standards for controlling noise. NZDF considers that this division allows a more comprehensive and appropriate method for controlling noise from TMTA.

1. Weapons firing and/or the use of explosives

The noise control standard uses a tiered approach for weapons firing and explosives, where the first tier is separation distances between the activity and any sensitive receiver (dwelling, residentially zoned site, or building used for residential, educational or healthcare purposes). Two separation distances are specified – a night-time distance and a daytime distance. The distances are conservative and have been arrived at after review and analysis of data measured from real military activities, to ensure that the sound levels received at the specified distances will be reasonable (generally less than 55 dBA for daytime and less than 45 dBA for night-time). Using separation distance as a standard has the advantage of being an easy to comply with and easy to monitor standard.

For weapons firing/explosives activities that are not able to meet the separation distance standard, or if the site location conditions meant that the setback could be reduced (e.g. where a hill separates a sensitive receiver from the TMTA), then the second tier - the peak sound pressure levels (dBC) - would apply. Where these peak sound pressure levels can be met, then the TMTA would be a permitted activity.

2. Mobile noise sources

For mobile noise sources (other than weapons firing and explosives), compliance with the construction noise standards is recommended, as this standard most appropriately addresses this type of noise.

3. Fixed (stationary) noise sources

For fixed noise sources, which can be located to ensure compliance with standards, dB LAeq levels are specified, in line with NZS6802:2008 Acoustics – Environmental Noise. This is considered the most appropriate way to control noise levels from these sources.

4. Helicopter landing areas

NZDF has also considered noise from helicopters associated with temporary military training activities. NZDF proposes the use of NZS6807:1994 Noise Management and Land Use Planning for Helicopter Landing Areas to control this type of noise.



First name: Jennifer

Last name: Molloy-Hargreaves

On behalf of:
Select an option...

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City:

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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
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 property's 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



First name: Hannah

Last name: Ritchie

On behalf of:
New Zealand Pork Industry Board

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City: Christchurch

Country: New Zealand

Postcode: 8543

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

Yes

Additional requirements for hearing:

Attached Documents

File
Taupo Plan Change 42 Rural Environment NZ Pork
Taupo Plan Change 38 Strategic Directions Submission NZ Pork

NZ PORK



SUBMISSION ON Taupō District Plan Change 42 (General Rural and Rural Lifestyle Environments)

29 November 2022

TO: Taupō District Council

SUBMITTER: New Zealand Pork Industry Board

1. Introduction

The New Zealand Pork Industry Board (NZPork) welcomes the opportunity to submit on the Taupō District Plan Change 42 (General Rural and Rural Lifestyle Environments).

NZPork could not gain an advantage in trade competition through this submission.

NZPork wishes to be heard in support of this submission and would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

Contact for service:

Hannah Ritchie
Senior Environmental Advisor
NZ Pork
PO Box 20176
Christchurch
8543



2. About the New Zealand Pork Industry

NZ Pork is a statutory Board funded by producer levies. It actively promotes "100% New Zealand Pork" to support a sustainable and profitable future for New Zealand grown pork. The Board's statutory function is to act in the interests of pig farmers to help attain the best possible net on-going returns while farming sustainably into the future.

The New Zealand pig industry is a highly productive specialized livestock sector, well integrated within New Zealand's primary production economic base. It draws on both downstream and upstream inputs and economic activity from New Zealand's rural sector including feed inputs, equipment and animal health supply, transport, slaughterhouse facilities plus further processing. Currently New Zealand's pig farmers produce around 45,350 tonnes of pig meat per year for New Zealand consumers. This represents around 38% of pig meat consumed by the domestic market, with the other 62% provided by imported pig meat from a range of countries. Nationally there are less than 100 commercial pork producers, comprising a relatively small but significantly integrated sector of the New Zealand agricultural economy. In 2007 it was estimated by the NZ Institute of Economic Research that the total economic activity associated with domestically farmed pigs was approximately \$750 million per annum.

Pigs' needs are unique compared to other farmed animals. They need constant access to shelter, a balanced diet and regular care and supervision. To meet these needs, New Zealand's commercial pig farmers have adopted a range of farming methods. Many farmers prefer indoor farming because they believe it allows them to provide the best care for the

modern animal by allowing them to carefully manage their environment. Approximately 55% of New Zealand's pigs are farmed in this way.

The other 45% of New Zealand's commercial breeding herd is farmed outdoors. Outdoor breeding (also called free-farmed pork) can only occur in a moderate climate with low rainfall and free-draining soil conditions. In New Zealand, these conditions are mostly found in Canterbury. In most free-farmed systems, sows are farmed in groups in paddocks during gestation with huts for shelter and shade. When sows farrow, they are provided with individual, dry and draught-free huts with straw for warmth. A variety of housing systems are then used to house pigs after weaning, including indoor barns or open-air sheds.

New Zealand pork producers are facing several economic, social and environmental challenges in order to remain viable. The contribution of imported pork to New Zealand's total pork consumption has increased significantly in recent years, placing further demands on producers who have responded by developing increasingly efficient systems. Currently, nearly all pork produced in New Zealand is consumed locally and makes up less than 40% of the domestic market supply.

The New Zealand pork industry is dedicated to producing environmentally sustainable pork. NZPork is proactive in supporting farmers to reduce environmental impacts through investing producer funds into research, innovation and technologies in a range of environmental areas including nutrient management, greenhouse gas emission reductions and by-product reuse. Pig farmers in New Zealand have a firm grasp of environmental issues and demonstrate a high level of innovation and environmental stewardship. The New Zealand pork industry has committed significant time and resource to Sustainable Farming Fund projects centred on environmental initiatives, including development and implementation of Environmental Guidelines (attached) and Nutrient Management Guidelines. However, profit margins for the industry remain tight and dialogue with farmers has indicated that compliance costs and uncertainty into the future are key issues.

3. Summary of submission

An overview of key points of feedback to the proposed plan change is provided below. Specific submission points are detailed in Section 4.

3.1 Definitions for Intensive Primary Production Activities.

NZ Pork supports the use of the National Planning Standards definition of Intensive Indoor Primary Production. However, there is no reference in the plan to outdoor intensive farming activities or outdoor pig farming activities. A definition of intensive indoor primary production should be part of a broader definition structure encompassing both indoor and outdoor intensive primary production activities (Intensive Primary Production) and delineate between intensive and extensive outdoor pig farming. We propose a definition for extensive pig farming based on the ability of the operation to maintain groundcover in accordance with industry good management practices. The maintenance of groundcover requires suitably low stocking densities that would make the farming practice and associated effects more akin to pastoral farming activities, and so should be subject to similar controls.

3.2 Reverse Sensitivity

The reverse sensitivity effects of new sensitive activities to existing pig farming activities are one of the primary causes of complaints and subsequent restrictions to established pig farming operations in rural areas. Objectives, policies and rules for reverse sensitivity within the General Rural Environment could be strengthened to better provide for the protection of primary production activities, as this is the primary purpose of the zone.

3.3 Workers Accommodation

Farming pigs is very different from farming other livestock. Stockpersons are far more involved with the care of pigs than other livestock. Pigs have a greater need for shelter and their social and dietary requirements are more complex than sheep and cattle. Animal care is a daily responsibility, as pigs are not like ruminants which derive their nutrition from grass: pigs are monogastric like humans, and require a balanced diet fed daily.

As such, providing accommodation on site for workers is an important component of many commercial pig farming operations, which often require the onsite provision of farm workers accommodation to provide onsite farm assistance, animal husbandry and security. NZPork notes that there are no specific provisions for worker accommodation in the proposed plan.

The provision of a minor residential unit with 100m² limitation and requirement at the minor residential unit is no more than 20m for the principal residential unit does not support a viable farm workers accommodation. NZPork seeks the inclusion of a definition, policy support and specific rule structure for workers accommodation.

4. Specific submissions on Taupō Plan Change 42.

Provision to which our submission relates	Our position on this provision is:	The reasons for our submission are:	The decision we want Council to make
Definitions			
Intensive Indoor Primary Production	Support in part	<p>Support the use of the National Planning Standards Definition for intensive indoor primary production.</p> <p>The definitions and associated rule structure for farming activities within the district should clearly define and delineate between intensive and extensive farming activities.</p> <p>At present, only intensive indoor primary production is defined, which means that all other types of farming activity would be captured by the definition of 'farming'.</p> <p>Pig farming which occurs outdoors may produce effects consistent with intensive farming in certain situations or circumstances (such as high stocking rates). This should be recognised in the plan and those activities protected from reverse sensitivity associated with sensitive activities.</p>	<p>Include additional definitions to cover the typical range of primary production activities that can be deemed intensive:</p> <p><u>Intensive Primary Production</u> means any activity defined as intensive indoor primary production or intensive outdoor primary production.</p> <p><u>Intensive Indoor Primary Production</u> (as per National Planning Standards definition) means primary production activities that principally occur within buildings and involve growing fungi, or keeping or rearing livestock (excluding calf-rearing for a specified time period) or poultry.</p> <p><u>Intensive Outdoor Primary Production</u> means any primary production activities involving the keeping or rearing of livestock (excluding calf-rearing for a specified time period) that principally occurs outdoors which, by the nature of the activity, precludes the maintenance of pasture or ground cover. Excludes <u>Extensive Pig Farming</u>.</p>

		A definition and rule structure that also accounts for outdoor <u>intensive</u> primary production activities and outdoor <u>extensive</u> primary production activities would give clarity to the plan.	<u>Extensive Pig Farming</u> means the <u>keeping of pigs outdoors on land at a stock density which ensures permanent vegetation cover is maintained and in accordance with any relevant industry code of practice, and where no fixed buildings are used for the continuous housing of animals.</u>
Primary Production		Primary production activities are referenced in the General Rural Environment chapter, but no definition is provided, which creates ambiguity as to the application of objectives, policies and rules to certain activities within the zone. Insert a new definition to the plan to provide for Primary Production activities.	Insert a new definition to the plan to provide for Primary Production activities, as per the National Planning Standards: <u>Primary production means:</u> <u>(a) any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities; and (b) includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a); (c) includes any land and buildings used for the production of the commodities from a) and used for the initial processing of the commodities in b); but (d) excludes further processing of those commodities into a different product:</u>
Sensitive activities		Define sensitive activities, being those activities likely to be sensitive to the effects of rural production and reverse sensitivity issues.	Sensitive activity means any: <u>Residential activity</u> <u>Visitor accommodation</u>

			<u>Community facility</u> <u>Educational facility</u> <u>Tourism activities</u> <u>Camping grounds</u> <u>Conference facilities</u> <u>Healthcare facilities</u>
3b Rural Environment Chapter			
3b.1 Introduction			
General Rural Environment	Support in part	<p>The use of the term General Rural Environment deviates from the terms defined in the National Planning Standards, which refer to 'Zones' rather than 'Environment'. For consistency across territorial boundaries, consistency in terminology as per the National Planning Standards should be achieved. The intent of the National Planning Standards was to assist with plan interpretation and administration particularly for lay users. Primary producers often operate across regional and district jurisdictions and while the language used might be subtle in difference this does not assist a plan users.</p> <p>The description of land use within the zone refers to a diverse range of land uses including farming, horticulture, energy and plantation forestry activities. Farming is not defined within the plan, and so this creates ambiguity as to the</p>	<p>Rename zone General Rural Zone to align with zones and zone purpose defined in the National Planning Standards.</p> <p>Incorporate the National Planning Standards description of the General Rural Zone.</p> <p>Amend description as follows:</p> <p>Primary production activities in the General Rural Environment will produce effects that are different from urban areas, such as noise, odour, vibration, spray drift and dust. <u>These effects should be anticipated and tolerated within a productive rural environment.</u></p>

		<p>accommodation of intensive farming activities as an expected activity within the zone.</p> <p>The National Planning Standards description of the General Rural Zone should be incorporated as this refers to areas used predominantly for primary production activities, including intensive indoor primary production, to avoid ambiguity.</p> <p>Support the acknowledgement of effects from primary production activities, however it should be explicitly stated within the introduction that these effects should be anticipated and tolerated within the general rural environment.</p>	
3b.2 Objectives and Policies – General Rural Environment			
3.b.2.1 Enable Primary Production	Support in part	Support, on the understanding that the definition of primary production is aligned with that of the National Planning Standards, which includes intensive indoor primary production.	Include definition of primary production within the plan change.
3.b.2.2 Maintaining the established General Rural character	Support in full	Support objective to maintain the character of the zone and avoid incremental subdivision and development.	Retain as proposed
Objective 3b.2.4 Other activities	Oppose in part	Oppose tourism activities and visitor accommodation as enabled activities within the general rural environment. These are sensitive activities and so could give rise to reverse sensitivity effects from established primary	<p>Amend objective as follows:</p> <p>Māori cultural activities, tourism activities, visitor accommodation and renewable electricity generation and transmission activities are enabled in the General Rural Environment.</p>

		<p>production activities operating within the vicinity of the tourism/visitor operations.</p> <p>This would in turn reduce the productive capability of the land by curtailing primary production activities in these areas.</p> <p>A policy and rule framework should address the potential impacts of sensitive activities on primary production activities, rather than enabling them as a general objective.</p>	<p><u>Tourism activities and visitor accommodation are provided for where their establishment and operation will not negatively impact on primary production activities within the General Rural Environment.</u></p>
Objective 3b.2.5 Avoidance of reverse sensitivity	Support in part	<p>Support an objective of avoiding reverse sensitivity, but this should specifically link back to not constraining the operation of primary production activities within the environment, as this is the primary function of the zone. This should also be supported by a specific rule framework to managed defined sensitive activities.</p>	<p>Amend objective as follows:</p> <p>Reverse sensitivity effects on permitted and legally established <u>Primary Production</u> activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided.</p>
Policy 3b.2.9 Maintaining the established character	Support in part	<p>Support policy to maintain the established character of the zone, but the description should also include reference to air-based effects including odour and dust as being typical of primary production activities within a rural environment.</p>	<p>Amend policy as follows:</p> <p>Maintain the established General Rural Environment character, as defined by:</p> <ul style="list-style-type: none"> a) Large open spaces between built structures b) A mix of residential and rural industry buildings c) Noises related to production activities during the day but low levels of noise at night d) Low levels of light spill.

			<p>e) Infrequent vehicle movements to and from a site</p> <p>f) Limited signage that directly relates to the activity operating on the site.</p> <p><u>g) sights, odour and dust associated with primary production activities.</u></p>
<p>Policy 3b.2.12 Minor residential unit</p>	Support in part	<p>Support policy providing for minor residential units however a separate policy and rule structure should be developed to provide for farm worker accommodation.</p> <p>The provisions for minor residential units are unsuited to farm worker accommodation, where workers are often accommodated with their families (so require a larger property size) and the most suitable location is not always in close proximity to the primary residence but will be based on the needs of the farm.</p>	<p>Create a policy and rule structure to provide for farm worker accommodation separate from the provisions for minor residential units.</p>
<p>Policy 3b.2.13 Avoiding reverse sensitivity</p>	Support in part	<p>Support policy to avoid reverse sensitivity, however this should be aimed at protecting primary production activities from neighbouring sensitive activities, to ensure the continued productive operation of the rural environment.</p>	<p>Amend policy as follows:</p> <p><u>Sensitive activities must be separated from primary production activities through the use of setbacks, to prevent reverse sensitivity effects from impacting on the ability of primary production to operate within the zone.</u></p>
4. Rules and Standards			
4b Rural Environment			
4b.1. General Rules – General Rural Environment			

4b.1.1 Activities in the General Rural Environment	Support in full	Support permitted activity status for all activities unless otherwise specified. Note that without a specific definition and rule structure in place for intensive outdoor primary production and extensive pig farming that this rule will cover both of these activities as permitted.	Retain as proposed. Provide a definition and rule structure for other intensive farming activities beyond Intensive Indoor Primary Production to give clarity to the application of this rule to such activities.
4.b.1.2 Minor Residential Units	Support in part.	<p>Support minor residential units as a permitted activity.</p> <p>Create a policy and rule structure to provide for farm worker accommodation separate from the provisions for minor residential units.</p>	Retain rule as proposed and create a new policy and rule structure to provide for farm worker accommodation separate from the provisions for minor residential units.
4.b.1.5 Commercial and industrial activities	Oppose	<p>Oppose commercial and industrial activity as a permitted activity within the General Rural Zone. This contradicts Objective 3b.2.3 which states that general commercial and industrial activities not having a locational need to be within the General Rural Environment are avoided and Objective 3b.2.1 which states that the availability of rural land resource will be protected for primary production activities.</p> <p>Commercial and industrial activities locating in the General Rural Environment can reduce the availability of productive land for primary production and give rise to reverse sensitivity effects from activities incompatible with primary production, further eroding the productive capacity of the zone.</p>	Amend activity status for commercial and industrial activities to discretionary.

		<p>The assessment of locational need should be addressed via a consenting pathway for these activities.</p> <p>The proposed plans approach to commercial and industrial activity directly conflicts with the zone purpose and district plan structure set out in the National Planning Standards.</p>	
4b.1.10 Intensive indoor primary production and rural industry	Support in part	<p>Support intensive indoor primary production and rural industry as a permitted activity, subject to standards. Support RD status for activities that don't comply with performance standards.</p> <p>Performance standards relating to building setbacks (4b.2.6) should also apply to intensive indoor primary production, to provide a setback between buildings housing animals and sensitive activities.</p> <p>A rule structure should also be provided for intensive <u>outdoor</u> primary production.</p>	<p>Amend rule as follows:</p> <p>i. An intensive indoor primary production or <u>intensive outdoor primary production or rural industry activity</u> 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.</p>
4b.2 Performance Standards – General Rural Environment			
4b.2.6 Minimum building setbacks	Support in part	<p>Support controls on minimum setback for buildings, however this should include setbacks for new sensitive activities from existing intensive primary production activities, to address potential reverse sensitive issues.</p> <p>The setback from buildings for the management of farmed animals would be better calculated from the notional boundary of any sensitive</p>	<p>Amend standard as follows:</p> <p>4b.2.6 Minimum building setbacks</p> <p>i. 30 metre setback for dwellings and minor residential units from the front boundary.</p> <p>ii. 15 metres from all other boundaries.</p>

		<p>activities, rather than the property boundary. This allows the maximum preferential use of the farm site, while offering protection to sensitive receptors in the environment (on boundaries where there are no sensitive activities, what is the setback aiming to achieve?). 300m is a standard setback distance which has been adopted in several other key pig farming districts.</p> <p>The potential effects of an intensive indoor primary production activity can arise from elsewhere on site beside the buildings in which the animals are kept, such as effluent ponds, feed milling sheds, loading areas etc. We recommend expanding the setbacks to accommodate these areas.</p>	<p>iii. 25 metres in Outstanding Landscape Areas from all boundaries.</p> <p>iv. 200- 300 <u>300</u> metres for buildings for the management of farmed animals, <u>or any hard stand areas, treatment systems or other structures related to an intensive indoor primary production activity</u> from all boundaries <u>the notional boundary of any lawfully established sensitive activity.</u></p> <p>v. <u>300 metres for new sensitive activities from the notional boundary of any lawfully established intensive farming activity.</u></p> <p>v. There shall be no front boundary setback for buildings and activities associated with Electricity Generation and Renewable Energy Generation Activities on land identified as Geothermal Area in Section O within an Electricity Generation Core Site where the road extends over any power generation Building or Structure.</p> <p>vi. There shall be no boundary setback for buildings and activities associated with Electricity Generation on land identified as Geothermal Area in Section O within an Electricity Generation Core Site.</p>
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NZ PORK



SUBMISSION ON Taupō District Plan Change 38 (Strategic Directions)

29 November 2022

TO: Taupō District Council

SUBMITTER: New Zealand Pork Industry Board

1. Introduction

The New Zealand Pork Industry Board (NZPork) welcomes the opportunity to submit on the Taupō District Plan Change 38 (Strategic Directions).

NZPork could not gain an advantage in trade competition through this submission.

NZPork wishes to be heard in support of this submission and would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

Contact for service:

Hannah Ritchie
Senior Environmental Advisor
NZ Pork
PO Box 20176
Christchurch
8543



2. About the New Zealand Pork Industry

NZ Pork is a statutory Board funded by producer levies. It actively promotes "100% New Zealand Pork" to support a sustainable and profitable future for New Zealand grown pork. The Board's statutory function is to act in the interests of pig farmers to help attain the best possible net on-going returns while farming sustainably into the future.

The New Zealand pig industry is a highly productive specialized livestock sector, well integrated within New Zealand's primary production economic base. It draws on both downstream and upstream inputs and economic activity from New Zealand's rural sector including feed inputs, equipment and animal health supply, transport, slaughterhouse facilities plus further processing. Currently New Zealand's pig farmers produce around 45,350 tonnes of pig meat per year for New Zealand consumers. This represents around 38% of pig meat consumed by the domestic market, with the other 62% provided by imported pig meat from a range of countries. Nationally there are less than 100 commercial pork producers, comprising a relatively small but significantly integrated sector of the New Zealand agricultural economy. In 2007 it was estimated by the NZ Institute of Economic Research that the total economic activity associated with domestically farmed pigs was approximately \$750 million per annum.

Pigs' needs are unique compared to other farmed animals. They need constant access to shelter, a balanced diet and regular care and supervision. To meet these needs, New Zealand's commercial pig farmers have adopted a range of farming methods. Many farmers prefer indoor farming because they believe it allows them to provide the best care for the

modern animal by allowing them to carefully manage their environment. Approximately 55% of New Zealand's pigs are farmed in this way.

The other 45% of New Zealand's commercial breeding herd is farmed outdoors. Outdoor breeding (also called free-farmed pork) can only occur in a moderate climate with low rainfall and free-draining soil conditions. In New Zealand, these conditions are mostly found in Canterbury. In most free-farmed systems, sows are farmed in groups in paddocks during gestation with huts for shelter and shade. When sows farrow, they are provided with individual, dry and draught-free huts with straw for warmth. A variety of housing systems are then used to house pigs after weaning, including indoor barns or open-air sheds.

New Zealand pork producers are facing several economic, social and environmental challenges in order to remain viable. The contribution of imported pork to New Zealand's total pork consumption has increased significantly in recent years, placing further demands on producers who have responded by developing increasingly efficient systems. Currently, nearly all pork produced in New Zealand is consumed locally and makes up less than 40% of the domestic market supply.

The New Zealand pork industry is dedicated to producing environmentally sustainable pork. NZPork is proactive in supporting farmers to reduce environmental impacts through investing producer funds into research, innovation and technologies in a range of environmental areas including nutrient management, greenhouse gas emission reductions and by-product reuse. Pig farmers in New Zealand have a firm grasp of environmental issues and demonstrate a high level of innovation and environmental stewardship. The New Zealand pork industry has committed significant time and resource to Sustainable Farming Fund projects centred on environmental initiatives, including development and implementation of Environmental Guidelines (attached) and Nutrient Management Guidelines. However, profit margins for the industry remain tight and dialogue with farmers has indicated that compliance costs and uncertainty into the future are key issues.

3. Specific submissions on Taupō Plan Change 38.

Provision to which our submission relates	Our position on this provision is:	The reasons for our submission are:	The decision we want Council to make
Strategic Directions			
Strategic Direction 2: Freshwater Quality/Te mana o te wai			
2.2.2 Objective			
1.	Oppose in part	<p>NZ Pork understands that this objective has been written to give effect to the NPS FM 2020, which states that every territorial authority must include objectives, policies, and methods in its district plan to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of <u>urban development</u> on the health and well-being of water bodies, freshwater ecosystems, and receiving environments.</p> <p>However, Objective 2.2.2.1 differs from that in the NPSFM by not specifically referencing <u>urban development</u>, and therefore broadening the scope beyond the intent of the policy statement.</p> <p>Clarification is needed as to the application of the objective - for example, would this objective extend to the rural environments when making</p>	Amend Objective 2.2.2(1) to an objective that corresponds to the function, powers and duties of the territorial authority.

		<p>consenting decisions on agricultural land use activities in the district, and to what extent?</p> <p>Proposed Objective 2.2.2(1) appears to extend the matters TDC would consider to include water quality from a discharge perspective which creates confusion between the function, powers and duties of the territorial authority from the regional council.</p>	
2.2.3 Policy			
4	Oppose in part	<p>The policy seeks that the District Plan will</p> <p><i>“Recognise the benefits of subdivision, land use and development activities which will directly contribute to the enhancement of freshwater quality.”</i></p> <p>In the absence of being able to review a comprehensive planning response (rather than sectional plan changes) the policy cannot be understood.</p>	<p>Explain in the strategic direction what benefits the district plan seeks to achieve for water quality within the function, powers and duties of the territorial authority.</p>

5.	Oppose in part	<p>Clarification is needed on the intent of the policy in managing '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 and all other waterways.</p> <p>Provide clarification on the intent of the policy to manage land use for freshwater quality outcomes. For example, would this objective extend to the rural environments when making consenting decisions on agricultural activities in the district, and to what extent?</p> <p>NZ Pork does not support duplication of land use and discharge management requirements between regional and district plans to manage freshwater quality.</p>	Amend Policy 2.2.3(5) to a policy that corresponds to the function, powers and duties of the territorial authority.
2.4 Strategic Direction 4: Climate Change			
2.4.2 Objective			
1.	Support in part	<p>Support objective to achieve positive climate change outcomes across the district, but it is unclear how this objective will be implemented in relation to land use and development activities such as agriculture.</p> <p>Agricultural activities can produce greenhouse gas emissions in excess of sequestration opportunities. How will agricultural activities be considered within this objective?</p>	Provide clarification through the strategic direction on how this objective relates back to land-use activities within the district that produce greenhouse gas emissions.

2 and 3	Support in full	The agricultural sector, including pig farmers, will be challenged by the new norms and acute weather events that climate change brings with it. NZ Pork supports objectives that acknowledge the need for resilience and adaptation across the district to address such challenges.	Retain as proposed.
2.4.3 Policy			
2.	Oppose in part	Clarification is needed on how this policy will relate to land use activities within the district such as agricultural production. How will the impacts on climate change of a particular activity be measured and assessed? How does this policy relate back to land use policies and rules in the rural zones?	Provide clarification through the strategic direction on the intent of the policy in relation to assessing and measuring the effects on climate change of individual land-based activities.
2.7 Strategic Direction 7: Rural Environments			
		<p>Create a new strategic direction, objectives and policies to outline the key strategic and significant resource management issues for the rural environments within the district.</p> <p>The rural environment is the largest by area within the district. Not acknowledging or defining the key issues for the zone within the</p>	<p>Create a new strategic direction, objectives and policies to outline the key strategic and significant resource management issues for the rural environments within the district.</p> <p>Social and Economic Wellbeing</p>

		<p>strategic objectives downplays the importance of the rural environments to the district.</p>	<ul style="list-style-type: none"> • Taupos rural environment contributes positively to the districts economic and social wellbeing. <p>Productive capacity</p> <ul style="list-style-type: none"> • Rural land remains available for primary production activities and productive capacity is protected. <p>Reverse Sensitivity</p> <ul style="list-style-type: none"> • Reverse sensitivity effects are managed so as not to constraint primary production activities • Rural lifestyle Opportunities for rural lifestyle subdivision and development are only provided in parts of the rural environment where they do not conflict with enabling primary production and protecting the productive potential of land.
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End of Submission.

Organisation:

Horticulture 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
Taupo District Plan Submission

SUBMISSION ON Taupo District Plan

1 December 2022

To: Taupo District Council

Name of Submitter: Horticulture New Zealand

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OVERVIEW

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Our submission

Horticulture New Zealand (HortNZ) thanks Taupo District Council for the opportunity to submit on the District Plan Change and welcomes any opportunity to continue to work with council and to discuss our submission.

HortNZ could not gain an advantage in trade competition through this submission.

HortNZ wishes to be heard in support of our submission and would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

The details of HortNZ's submission and decisions we are seeking are set out in our submission below.

HortNZ's Role

Background to HortNZ

HortNZ represents the interests of approximately 5,500 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruit, and vegetables. The horticultural sector provides over 40,000 jobs. The horticulture sector is valued at 6.95bn.

There is approximately, 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain; and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

HortNZ's purpose is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand.

HortNZ's Resource Management Act 1991 Involvement

On behalf of its grower members HortNZ takes a detailed involvement in resource management planning processes around New Zealand. HortNZ works to raise growers' awareness of the Resource Management Act 1991 (RMA) to ensure effective grower involvement under the Act.

Submission

1. Horticulture in Taupo

Although LUC 1-3 in the district is low at 33,197 hectares¹, horticulture is an emerging market in the Taupo district due to the geothermal power source. In addition, the central north island provides ideal climatic conditions for growing tomatoes and capsicums due to cooler temperatures which cause the plants to reproduce more frequently.

By way of example, Gourmet Mokai has been established in the region since 2002 and uses geothermal to heat the glasshouses which cover five hectares. Around 50 full time staff are employed in addition to seasonal staff.

Vegetables grown include palermo, chillies, tomatoes and capsicums (around 175,000 capsicum and tomato plants are grown each year). The bulk of the produce is exported to Japan and Australia and to supplying the local market.

Other horticulture operations in the district include hydroponic lettuce and microgreens.

2. Summary of Decisions Sought by HortNZ

HortNZ seek the following outcomes:

- Definitions and rules that recognise the importance of primary production
 - Reverse sensitivity
 - Ancillary earthworks
 - Seasonal accommodation
 - Greenhouses
 - Artificial crop protection and crop protection structures
 - Frost fan and audible bird scarers
- Provisions that recognise highly productive land in line with the National Policy Statement Highly Productive Land
- Strategic direction that provides for primary production and which is not compromised by other activities
- Strategic direction for the rural environment
- Revised strategic direction that relates to council jurisdiction
- Provisions for activities and buildings/structures that are an inherent part of horticulture
- Appropriate setbacks for dwellings, buildings and artificial crop protection structures from boundaries

3. Proposed Taupo District Plan

3.1. Strategic Direction

There is no strategic direction for the rural environment. By council's own reasoning, rural environment makes of most of the land in the district. As required by the planning standards,

¹ https://ourenvironment.scinfo.org.nz/maps-and-tools/app/Land%20Suitability/Iri_luc_main

HortNZ has proposed a strategic direction for plan change 38 (rural environment) that provides for significant resource management matters for the rural environment throughout the district.

Plan change 38 (strategic direction) in its current form crosses jurisdiction boundaries between Waikato Regional Council and Taupo District Council. A regional council has the jurisdiction to manage water – discharges to water and water allocation. A district council is restricted to activities on the surface of water and land use activities. We support integrated resource management (particularly for freshwater) but are of the opinion that the strategic direction should be focused on matters that the Taupo District Council has jurisdiction (functions, powers and duties) over as prescribed in the RMA. The proposal appears intended to address urban related freshwater management issues but could be interpreted as a means of rural land use control to achieve freshwater management outcomes when no corresponding methods are or should be applied through the district plan.

To avoid confusion, regulatory duplication and inconsistency across planning documents, the strategic direction should be removed.

3.2. Plan Format

The purpose of the of national planning standards is to improve efficiency and effectiveness of the planning system by providing nationally consistent:

- Structure
- Format
- Definitions
- Noise and vibration metrics
- Electronic functionality and accessibility

This is important for regional policy statements, regional plans, district plans and combined plans under the Resource Management Act 1991 ('RMA') and particularly important for the horticultural sector that typically operates across territorial boundaries such that the ability to easily navigate planning documents is necessary (as was the intent of the National Planning Standards 2019).

The format and structure of the rural and strategic direction chapter have not been drafted inline with the planning standards. These chapters will need to be redrafted to ensure standards are met. If the council is doing a rolling review, the new format can be used on a rolling basis.

3.3. Future-proofing the District Plan to enable horticulture growth

It is important the district plan is future-proofed so that it is fit-for-purpose and responsive to change over its approximately ten-year life (under the current RMA review timeframes) – notwithstanding the RMA reforms. The review of the rural provisions of the district plan is occurring in a dynamic space of change – including freshwater regulations, climate change mitigation and adaptation and national policy context in terms of matters such as highly productive land, biodiversity and urban development. This highlights the importance of future-proofing the availability of resources to supply the district's growing population.

3.3 General Zoning Approach

HortNZ supports the intent of the General Rural Environment (GRUZ) however protection of the rural zone from incompatible activities and reverse sensitivity should be strengthened.

HortNZ supports rural lifestyle development being directed towards defined areas (e.g the Rural Lifestyle Zone) and a robust policy framework that limits ad-hoc development of inappropriate activities within the GRUZ. This is important for maintaining the viability of horticultural operations within rural areas.

3.4 Highly Productive Land

The National Policy Statement for Highly Productive Land (NPSHPL) seeks to protect highly productive land (HPL) for primary production uses. The objective and policies provide clear avoid policies against inappropriate subdivision, use and development of HPL. There are also specific protection clauses for existing use, productive uses and reverse sensitivity.

The NPSHPL has one Objective: *Highly productive land is protected for use in land-based primary production, both now and for future generations.* There are nine policies which support the objective. The policies set a clear pathway that HPL is to be protected - urban rezoning, rezoning and development as rural lifestyle, and subdivision, are activities to be avoided. Policy 9 also provides for reverse sensitivity effects to be managed so as not to constrain land based primary production on HPL.

HortNZ seeks a definition for HPL and objectives, policies and rules that protect HPL from inappropriate use as well as to allow for buildings and activities that support primary production on HPL e.g postharvest facilities, wash houses seasonal accommodation etc.

3.5 Reverse Sensitivity

Reverse sensitivity issues are becoming an increasing problem for the horticulture sector as more people move into productive areas who do not have realistic expectations with regards to the activities that can occur because of primary production. Horticulture tends to be particularly susceptible to reverse sensitivity effects due to the location of highly productive land often being located near urban centres and/or the land they operate on being subject to demand for urban development.

It is important for district plans to include a robust management response. Setbacks are an important management tool in helping to manage the potential for reverse sensitivity effects. As a permitted activity requirement, they do not preclude development within a lesser distance, but at least ensure that a site-specific assessment can be made through a resource consent process.

A definition is sought for reverse sensitivity and consideration given to appropriate setbacks throughout the plan to avoid reverse sensitivity effects.

4. Providing for horticultural activities in the rural environment

4.1 Seasonal Worker Accommodation

Seasonal worker accommodation provides for temporary and often communal living arrangements; it is quite distinct from permanent worker accommodation which might support a full-time employee and their family. It is a definable activity that requires a specific resource management response to reflect the nature of the activity. Accommodating seasonal workers in appropriate accommodation near their places of employment is more efficient for the horticulture industry, than accommodation that will need to be found further afield and workers will be required to commute.

The district plan will provide a planning framework for the community for at least the next decade and therefore a definition of seasonal worker accommodation should be included in the plan and should be provided for within the GRUZ. Several district plans have taken the approach of providing for such facilities based on a concept of shared kitchen and ablution facilities and separate sleeping quarters. This type of facility is cost efficient and adequately provides for seasonal accommodation.

4.2 Artificial Crop Protection Structures (ACPS) and Crop Support Structures (CSS)

Artificial Crop Protection Structures (ACPS) are structures that use permeable materials to cover and protect crops and are now essential for horticulture production of some crops.

Crop Support Structures (CSS) extend to a variety of structures upon which various crops rely for growth and support and are positioned and designed to direct growth to establish canopies. They include 'A', 'T' and 'Y' frames, pergolas and fences.

Land use controls imposed by district plans have the most direct impact on the resource management regulatory framework for CSS and ACPS. It is here that growers typically have interaction and issues with the regulatory authority. HortNZ has experienced inconsistency in how these structures are controlled under 'generic' building or structure rules, due to the broadness of these definitions (and ensuing uncertainty in whether they are a building or not). Often then being caught by controls such as - yard setbacks, height limitations, height to boundary controls, building coverage limitations, impervious surface limitations, amenity controls (colour, reflectivity) etc. - which are not always relevant.

The National Planning Standards now define building. We note the following commentary from the Ministry for the Environment's 'Recommendations on Submissions Report for the first set of National Planning Standards' for 2I Definitions Standard²:

"It was considered that any exclusion for a permeable roof could result in a loophole in the definition. Is a roof that leaks a permeable roof? How impermeable would it need to be to qualify? This could make it difficult for compliance and enforcement purposes. We consider that it would be better for the plan provisions (rather than the building definition) to clearly enable crop protection structures or other similar structures if this is the desired outcome" (pg 52)

² <https://environment.govt.nz/publications/2i-definitions-standard-recommendations-on-submissions-report-for-the-first-set-of-national-planning-standards/>

In light of this, HortNZ has submitted seeking that a specific definition is provided for CSS and ACPS so that a specific, clear and appropriate rule framework can be applied which includes a permitted activity rule for CSS and ACPS in the GRUZ.

Several district plans around the country specifically provide provisions for ACPS (including for example Whangarei, Auckland, Opotiki, Western Bay of Plenty, Whakatane, Hastings, Tasman).

4.3 Shelterbelts

Shelterbelts are part of primary production activities and assist in realising productive potential. They are an important mechanism for growers by providing shelter from wind and prevent agrichemical spray drift. Shelterbelts are also a mechanism that can reduce the potential for reverse sensitivity complaints as there is barrier between the primary productive activity and adjoining properties.

Shelterbelts play an important role in providing protection from wind and also mitigating spray draft and are generally necessary on a boundary for some crops. HortNZ seeks a definition of shelterbelt to recognise the importance of mitigating spray drift.

4.4 Earthworks

The industry requires several supporting activities and infrastructure to enable on-going operation and development. HortNZ seeks an approach to provide for ancillary rural earthworks. There is a need to provide for 'day-to-day' activities that are integral to productive land use in the rural zone.

Ancillary rural earthworks is the disturbance of soil, earth or substrate land surfaces ancillary to farming that includes:

- Land preparation and cultivation (including establishment of sediment and erosion control measures), for planting and growing operations and harvesting of agricultural and horticultural crops (farming)
- Burying of material infected by unwanted organisms as declared by Ministry for Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993
- Irrigation and land drainage
- Maintenance and construction of facilities, devices and structures typically associated with farming activities including but not limited to farm tracks, driveways and unsealed parking areas, stock races, silage pits, farm drains, farm effluent ponds, and feeding lots, fencing, crop protection and sediment control measures.

HortNZ has developed a code of practice for erosion and sediment control to provide guidance at an industry level for cultivation of vegetable crops (Horticulture New Zealand Code of Practice 'Erosion and Sediment Control Guidelines for Vegetable Production' (June 2014³). We also note that Farm Environment Plans also assist in managing day-to-day activity and are requirements at a regional level in some catchments and coming through at a national level - this lessens the need for regulation at a district plan level. Note: Cultivation is not covered by earthwork rules.

³ <https://www.hortnz.co.nz/assets/Compliance/Erosion-and-Sediment-Control-Guidelines-for-vegetable-production-v1.1.pdf>

4.5 Approach to Managing Greenhouses

Historically, and with changing practice, crop types and diversification in the horticultural sector, growers have become increasingly reliant on a variety of covered cropping methods to support rural production activities. Growing within a greenhouse can produce a more consistent yield and consistent quality of product for longer periods of the year in comparison to outdoor growing. On this basis HortNZ seeks a definition of greenhouse be included.

In the proposed plan, greenhouses are not included in the definition of 'Intensive Primary Production' which HortNZ supports. This is consistent with the definition for Intensive primary production in the National Planning Standards:

"Means primary production activities that principally occur within buildings and involve growing fungi or keeping or rearing livestock (excluding calf-rearing for a specified time period) or poultry"⁴.

HortNZ does not consider that the rules for intensive primary production are appropriate for greenhouses, and instead they can be addressed through the rules applicable to primary production (which include performance standards relating to matters such as building coverage, height, setbacks, transport, light, noise etc.).

4.6 Noise

Rural environments are working rural production areas and should not be portrayed as quiet. Noise does occur in those areas, sometimes on an intermittent or seasonal basis. Ensuring adequate setbacks of dwellings from horticultural properties is an important part of minimising the potential for reverse sensitivity complaints.

If rural noise standards are being considered, the following factors should be incorporated:

- Rural activities in rural areas should not be subject to urban standards for noise as it will curtail rural productivity
- Daytime noise controls should be effective seven days per week – not limited to Monday to Friday as primary production activities are not limited Monday to Saturday
- Noise standards in rural zones should be at least 55 LAeq to ensure that any assessment against the permitted baseline represents the normal rural environment
- Specific rules should be provided for some rural production activities that are not able to be controlled by noise standards such as frost fans and audible bird scaring devices. Such a provision is included in most district plans, such as Whakatane and Western Bay of Plenty and an example is provided below
- An exemption for normal primary production activities in the rural zone

The example below has a similar effect to sections 326-328 of the RMA.

Exemption from noise standards

Subject to best practicable option being adopted the following activities are exempt from complying with noise standards:

⁴ <https://environment.govt.nz/assets/publications/national-planning-standards-november-2019-updated-2022.pdf>

- Rural production activities, including agricultural and horticultural vehicles and equipment; aircraft used for agricultural and horticultural purposes; and portable equipment (excluding portable sawmills and frost protection fans and audible bird scaring devices) associated with agricultural and horticultural activities such as: spraying, harvesting
- Livestock

In the draft plan, frost fans and audible bird scaring devices have not been included in definitions or as a permitted activity in the GRUZ.

Frost Fans

A frost fan is essentially a steel tower with a rotating fan near the top. Frost fans are expensive pieces of equipment that growers invest in to provide a means of protecting their crops if frosts occur. Frost fans cost money to operate and need to be supervised while in operation. They are generally operated during the very early hours of the morning and therefore growers certainly do not operate them unnecessarily. Growers need to be able to operate them if temperatures drop below the critical threshold for their crop

Audible bird scarer devices

A bird scarer is a noise emitting device being used for the purpose of disturbing or scaring birds and can include a gas gun, avian distress alarm, or firearm when being used specifically for bird scaring. This is a necessary part of horticulture to protect the crop ready for harvest as birds can destroy an entire crop if not managed.

It is important to understand that audible bird scarers are used for a limited period of the year. They are not used year-round.

4.7 Biosecurity

The issue of biosecurity relates to the maintenance and enhancement of biodiversity values in the district. There is a need for rapid response in the event of a biosecurity incursion of an unwanted organism. Vegetation removal, burial, burning and spraying of material are methods that may be used. It is therefore important that the plan adequately provides for these activities to be undertaken.

HortNZ seeks provisions to provide for the active management of pest plants and pest animals including those identified in the Regional Pest Management Plan and unwanted organisms under the Biosecurity Act 1993.

Submission on PC 38 and 42 to the Taupo District Plan

Without limiting the generality of the above, HortNZ seeks the following decisions on the plan change 38 and 42, as set out below, or alternative amendments to address the substance of the concerns raised in this submission and any consequential amendments required to address the concerns raised in this submission.

Additions are indicated by bolded underline, and deletions by strikethrough text.

Provision	Support/ oppose	Reason	Decision sought
Definition			
Intensive indoor primary production	Oppose in part	Definition doesn't align with the National Planning Standards	Amend definition Means primary production activities that principally occur within buildings that and involve growing produce fungi or keeping or rearing livestock (excluding calf-rearing for a specified time period) or poultry.
Residential activities	Oppose in part	Unsure why this definition is noted for rural environment only. Definition should apply across the board	Amend (Rural Environment) the use of land and buildings by people for the purpose of permanent living accommodation and includes associated accessory buildings.
Rural industry	Oppose in part	Definition doesn't align with the National Planning Standards	

			<p><u>Means industry or business undertaken in a rural environment</u> 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, dairy farming and geothermal/electricity generation.</p>
<p>New definition - <u>Ancillary rural earthworks</u></p>	<p>New definition</p>	<p>There is a need to provide for 'day-to-day' activities that are integral to productive land use in the rural zone.</p> <p>In HortNZ's experience, providing a definition for ancillary rural earthworks and a clear rule framework is an efficient approach.</p> <p>Cultivation (gardening, and the disturbance of land for the installation of fence posts) are excluded from the definition of earthworks, however there are other activities which HortNZ seeks to provide for.</p>	<p>Amend to include a definition of 'ancillary rural earthworks'</p> <p><u>Ancillary rural earthworks means earthworks associated with primary production, such as:</u></p> <ul style="list-style-type: none"> <u>a. maintenance of drains, troughs and installation of their associated pipe networks, drilling bores and offal pits, burying of dead stock and plant waste, erosion and sediment control measures</u> <u>b. the burying of material infected by unwanted organisms as declared by the Ministry of Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993.</u>

			Note: For clarity, it is noted that cultivation is not 'defined as earthworks'.
New definition - <u>Agricultural aviation movements</u>	New definition	A definition would provide clarity within the plan - as detailed in this submission, HortNZ seeks to clearly provide for this activity as a permitted activity in rural zones due to its intermittent nature.	<p>Include a definition for 'agricultural aviation movements',</p> <p><u>Agricultural aviation movements mean intermittent aircraft and helicopter movements for purposes ancillary to primary production activities, including topdressing, spraying, stock management, fertiliser application, and frost mitigation, and associated refuelling.</u></p>
New definition - <u>Artificial crop protection structures and Crop support structures</u>	New definition sought	<p>As noted above, HortNZ seek to ensure that these structures are not inadvertently covered by inappropriate effects standards, where there is a risk that they may be considered 'buildings' (due to inconsistency in interpretation).</p> <p>A way of addressing this is to provide a clear framework through a definition and specific standard or rule for the rural zone.</p> <p>For further clarity, a definition of crop support structure could also be</p>	<p>Include a definition for 'artificial crop protection structures'</p> <p><u>Artificial crop protection structure means structures with material used to protect crops and/or enhance growth (excluding greenhouses).</u></p> <p><u>Note: For the avoidance of doubt artificial crop protection structures are not a building.</u></p> <p>Include a definition for 'artificial support structure'</p>

		included as this term is referred to in the plan also.	<u>Crop support structure means an open structure on which plants are grown</u>
New definition - <u>Audible bird scaring device</u>	New definition	These devices are used at certain times of the year to scare birds from certain crops. They are a significant part of horticulture production.	Include <u>Gas guns and avian distress alarms used for the purposes of disturbing or scaring birds, and excludes firearms and vehicles used for that purpose.</u>
New definition - <u>Frost fans</u>	New definition	Frost fans are used on horticultural properties to prevent frost damage to crops, mainly fruit crops such as kiwifruit, summerfruit, and apples. Frost damage to crops, particularly at bud burst, can cause reduced crop yield and hence reduced revenue.	Include <u>Means a machine used to move air around a horticultural or rural site for the purpose of drying fruit or mitigating the effects of frost.</u>
New definition - <u>Greenhouse</u>	New definition	A definition should be included for greenhouses to support diversification to alternative growing methods	Include a definition for greenhouses <u>Greenhouses means a structure enclosed by glass or other transparent impermeable material and used for the cultivation or protection of plants in a controlled environment but excludes artificial crop protection structures</u>
New definition - <u>Highly productive land</u>	New definition	Include definition consistent with the National Policy Statement Highly Productive Land	Include definition in consideration to National Policy Statement Highly Productive Land

New definition - <u>Land based primary production</u>	New definition	Include definition consistent with the National Policy Statement Highly Productive Land	Add definition <u>Production from agricultural, pastoral, horticultural, or forestry activities, that is reliant on the soil resource of the land</u>
New definition - <u>National Grid Yard</u>	New definition	The National Policy Statement on Electricity Transmission 2008 (NPSET), a planning document under the Resource Management Act 1991 (RMA), requires Council's to give effect to the NPSET objectives and policies in all plan documents. A council's district may give effect to the NPSET by including specific rules about subdivision, land use and development near National Grid transmission lines and substations.	Define National Grid Yard as follows: <u>The area located within:</u> <ul style="list-style-type: none"> • <u>12m in any direction from the visible outer edge of a National Grid tower; or</u> • <u>10m in any direction from a National Grid single pole or pi-pole; or</u> • <u>The area located within 10m either side of the centreline of any overhead 110kV National Grid line on single or pi-pole; or</u> • <u>The area located within 12m either side of the centre line of any overhead National Grid line on towers.</u>
New definition - <u>Noise</u>	New definition	Consistent with National Planning Standards and RMA	Include definition <u>Has the same meaning as in section 2 of the RMA</u> <u>Includes vibration.</u>
New definition - <u>Primary Production</u>	New definition	Include definition to align with planning standards	Include definition

			<p>means:</p> <ul style="list-style-type: none"> • <u>any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities; and</u> • <u>includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a);</u> • <u>includes any land and buildings used for the production of the commodities from a) and used for the initial processing of the commodities in b); but</u> • <u>excludes further processing of those commodities into a different product.</u>
New definition - <u>Reverse sensitivity</u>	New definition	A definition for reverse sensitivity that should be included in the Plan.	<p>Include a new definition for reverse sensitivity</p> <p><u>Means the vulnerability of an existing lawfully established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activity, thereby creating the potential for the</u></p>

			<u>operation of such existing activity to be constrained</u>
New definition - <u>Rural produce retail</u>	New definition	To support retail sales of produce in rural zone	Include definition <u>Means the sale of rural produce grown or produced by the rural production operation, including products manufactured from that produce</u>
New definition - <u>Seasonal worker accommodation</u>	New definition	Include a definition for seasonal worker accommodation as it is distinct from visitor accommodation.	Insert new definition as follows: <u>Seasonal worker accommodation means the use of land and buildings for the sole purpose of accommodating the short-term labour requirement of a farming activity, rural industry or post-harvest facility.</u>
New definition - <u>Shelterbelt</u>	New definition	Shelter belts protect crops from winds and mitigate spray drift	Include definition <u>Means any trees planted primarily to provide shelter for stock, crops or buildings from the prevailing wind(s) or to mitigate potential spray drift from agrichemical applications</u>
Objectives and Policies - General Rural Environment			
3b.2.1 Enable primary production	Support		Retain

Objective - OX	New	To provide for primary production and ancillary activities in rural zone	Include OX <u>The rural zone is used for primary production activities, ancillary activities that support primary production and other compatible activities that have a functional and operational need to be in a rural environment.</u>
3b.2.2 Maintaining the established General Rural character	Support		Retain
3b.2.3 Rural industry	Support		Retain
3b.2.4 Other activities	Support in part	It is important that visitor accommodation and tourism activities in the rural environment is of a scale and/or managed such that it does not impact on the ability to productive use rural land.	Amend Māori cultural activities, tourism activities, visitor accommodation and renewable electricity generation and transmission activities are enabled in the General Rural Environment <u>where they do not adversely impact on the productive land use</u>
3b.2.5 Avoidance of reverse sensitivity	Support		Retain

<p>3b.2.9 Maintaining the established character</p>	<p>Oppose in part</p>	<p>Current policy is somewhat draconian and limits activities</p>	<p>Delete policy and replace</p> <p><u>Land use and subdivision activities are undertaken in a manner that maintains or enhances the rural character and amenity of the rural zone, which includes:</u></p> <ul style="list-style-type: none"> <u>i. a predominance of primary production activities</u> <u>ii. generally open space between built structures</u> <u>iii. typical adverse effects such as odour, noise and dust associated with a rural working environment; and</u> <u>iv. a diverse range of rural environments, rural character and amenity values throughout the district.</u>
<p>Policy - PX</p>	<p>New</p>	<p>Subdivision should be avoided in the rural environment</p>	<p><u>Avoid subdivision that:</u></p> <ul style="list-style-type: none"> <u>i. results in the loss of highly productive land for use by land based primary production;</u>

			<ul style="list-style-type: none"> ii. <u>fragments land into parcel sizes that are no longer able to support land based primary production, taking into account:</u> iii. <u>the type of farming proposed; and</u> iv. <u>whether smaller land parcels can support more productive forms of farming due to the presence of highly productive land.</u> v. <u>provides for rural lifestyle living unless there is an environmental benefit.</u>
Policy - PX	New	<p>Consistent with National Policy Statement of Highly Productive Land.</p> <p>Avoids incompatible activities from rural environment.</p>	<p><u>Avoid land use that:</u></p> <ul style="list-style-type: none"> i. <u>is incompatible with the purpose, character and amenity of the general rural environment;</u> ii. <u>does not have a functional need to locate in the general rural environment and is more appropriately located in another zone;</u>

			<ul style="list-style-type: none"> iii. <u>would result in the loss of productive capacity of highly productive land;</u> iv. <u>would exacerbate natural hazards; and</u> v. <u>cannot provide appropriate on-site infrastructure.</u> vi. <u>could result in reverse sensitivity effects</u>
3b.2.10 Residential units	Support		Retain
3b.2.13 Avoiding reverse sensitivity	Support in part	Amend policy to avoid and mitigate reverse sensitivity effects	Amend and replace with <u>Manage the establishment, design and location of new sensitive activities and other non-productive activities in the general rural environment to avoid where possible, or otherwise mitigate, reverse sensitivity effects on primary production activities.</u>
3b.2.14 Commercial and industrial activity	Support in part	These activities should be avoided in the rural environment	Amend Limit the scale of Avoid commercial and industrial activity to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary

			production activities within the general rural environment.
3b.3.1 Maintain the character of the Rural Lifestyle Environment	Support		Retain
3b.3.2 Avoid reverse sensitivity	Support		Retain
3b.3.3 Commercial and industrial activities	Support		Retain
3b.3.4 Consolidate rural lifestyle activities	Oppose	It is unclear what this objective hopes to achieve. Rural lifestyle activities are not defined in the plan	Delete 3b.3.4
3b.3.9 Character of the Rural Lifestyle Environment	Support in part	It is not clear 'what dominating the landscape' means. Rural buildings can be large in nature.	Amend b) Accessory buildings that do not dominate the landscape. c) Dwellings may be large but are surrounded by open space and do not dominate the landscape.
General Rural Zone			
4b.1.7	Oppose	There are no provisions for artificial crop protection structures and a	<u>Amend</u>

<p>High voltage transmission lines</p>	<p>setback of 12m from a critical electricity line would compromise horticultural activities.</p> <p>If the activity complies with NZECP34:2001 then the activity should be permitted, not just when being undertaken by a network utility operation.</p>	<p><u>Rename to National Grid and delete High Voltage Transmission Lines</u></p> <p><u>Delete 4b.1.7 and replace</u></p> <p><u>Activity status: Permitted</u> <u>Where: PER-1</u></p> <p><u>No new building(s) or structures, and extensions shall be erected within 12m of any National Grid support structure, except for fences less than 2.5m in height and more than 5m from the support structure.</u></p> <p><u>PER-2</u></p> <p><u>Under the National Grid Conductors (wires) the following can occur:</u></p> <ul style="list-style-type: none"> • <u>A fence less than 2.5m in height</u> • <u>An extension to existing buildings used for sensitive activities that do not increase the building envelope</u> • <u>Non habitable buildings ancillary to a farming activity, such as milking sheds, piggeries, poultry sheds,</u>
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			<p><u>greenhouses and protective canopies.</u></p> <p><u>This rule does not apply to: network utilities within a transport corridor or any part of electricity infrastructure that connects the National Grid.</u></p> <p><u>NOTES:</u></p> <ul style="list-style-type: none"> • <u>Structures and activities located near transmission lines must comply with the safe distance requirements in the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001). Compliance with this plan does not ensure compliance with NZECP34:2001;</u> • <u>Vegetation planted near the National Grid Yard should be selected and/or managed to ensure that it complies with the Electricity (Hazards from Trees) Regulations 2003.</u>
4b.1.8 Buildings within Outstanding Landscape Areas	Oppose in part	While the rule heading relates to buildings, the provisions within the rule relate to structures - these are two separate things.	Amend Delete 'structures' and replace with <u>'buildings'</u> .

			Allow rule for artificial crop protection structure as a permitted activity within outstanding landscape area
4b.1.9 Earthworks within Outstanding Landscape Areas	Oppose in part	There should be allowances for permitted activity for primary production earthworks and indigenous vegetation clearance	<p>Amend 4b.1.0 to include PER</p> <p><u>Activity status: Permitted</u></p> <p><u>Where:</u></p> <p><u>PER-1</u></p> <p><u>The earthworks or indigenous vegetation clearance is:</u></p> <p><u>required for repair or maintenance</u></p> <p><u>required to provide for safe and reasonable clearance for existing overhead power lines.</u></p> <p><u>necessary to address a risk to public health and safety.</u></p> <p><u>for biosecurity reasons.</u></p> <p><u>for the sustainable non-commercial harvest of plant material for rongoā Māori.</u></p> <p><u>PER-2</u></p> <p><u>The earthworks or indigenous vegetation clearance outside the</u></p>

			<u>coastal environment complies with standard earthworks or indigenous vegetation clearance</u>
4b.1.10 Intensive indoor primary production and rural industry	Support in part	Note proposed amendments for 4b.2.2	Retain however note amendments to 4b.2.2
4b.2.2 Intensive indoor primary production and rural industry	Support in part	The standard provides for 10% site coverage by buildings or structures – due to nature of ancillary buildings, an increase of 12.5% is proposed. There should be provision for a greater site coverage of artificial crop protection structures and green houses	Amend 4b.2.2 by adding: 10 12.5% of the total allotment area <u>This standard does not apply to:</u> <u>a. Artificial crop protection structures</u> <u>b. Greenhouses</u>
GRUZ - RX Seasonal worker accommodation	New rule	The provision of seasonal worker accommodation is becoming a necessary supporting activity to horticultural operations. HortNZ is seeking a suite of provisions to provide for this activity – this is explained in more depth in the submission. HortNZ seeks that where seasonal worker accommodation does not meet the permitted activity standards, that	Include a permitted activity rule for Seasonal Worker Accommodation <u>RPROZ-RX – Seasonal Worker Accommodation</u> <u>Activity Status: PER</u> <u>1. The establishment of a new, or expansion of existing seasonal worker accommodation.</u> <u>Where:</u>

this default to a Restricted Discretionary rule.

a. The seasonal worker accommodation is associated with horticultural activity

b. The accommodation comprises of a combination of communal kitchen and eating areas and sleeping and ablution facilities

c. The accommodation provides for no more than 12 workers

d. It complies with Code of Practice for Able Bodied Seasonal Workers, published by Dept of Building and Housing 2008.

Where this activity complies with the following rule requirements:

4b.2.5 - Maximum height

4b.2.6 - Setbacks

Activity status when compliance not achieved:

2. When compliance with RPROX-RX 1. (a)-(d) is not achieved: RDIS Matters of discretion:

Those matters in RPROZ-RX 1. (a)-(d) that are not able to be met

			<p><u>Methods to avoid, remedy or mitigate the effects on existing activities, including the provision of screening, landscaping and methods for noise control</u></p> <p><u>The extent to which the application complies with the Code of Practice for Able Bodied Seasonal Workers, published by Dept of Building and Housing 2008</u></p> <p><u>4.Where compliance with any rule requirement is not achieved: Refer to relevant Rule Requirement</u></p> <p><u>Note: HortNZ has elsewhere in this submission sought definitions be included for Seasonal Worker Accommodation.</u></p>
Performance Standards - General Rural Environment			
4b.2.5 Maximum building height	Support in part	Provision to exclude artificial crop protection structures	Amend 4b.2.5 <u>This standard does not apply to:</u> <u>a. Artificial crop protection structures</u>
4b.2.6	Support in part	A clear distinction should be provided for habitable buildings. 15 meters is	Amend 4b.2.6

Minimum building setbacks		considered insufficient to address potential reverse sensitivity effects.	<p>i. 30 metre setback for habitable dwellings and minor residential units from the front boundary</p> <p>ii. 4520 metres from all other boundaries.</p> <p>vii. <u>Artificial crop protection and support structures must be setback at least 1 m from all site boundaries</u></p>
4b.2.7 Minor residential units	Support in part Oppose in part	<p>HortNZ does not support combined standard for accommodation activities due to reverse sensitivity effects. Separate rules and standards should be drafted for:</p> <ul style="list-style-type: none"> • Visitor accommodation • Seasonal accommodation • Tiny homes/caravans <p>The standards relating to buildings should be included in these rules</p>	<p>A maximum of one minor residential unit per primary residential unit per allotment.</p> <p>i. All minor residential or accommodation activity units shall:</p> <p>a. Be no larger than 100m² <u>Not exceed a GFA of 65m²</u> in size.</p> <p>b. Be located no greater than 20 15 metres from the primary residential unit.</p> <p>c. Share an accessway/driveway with the primary residential unit.</p> <p>NOTE: Minor residential units also include accommodation activities, tiny</p>

			<p>homes/houses, caravans and other structures used for accommodation for more than</p> <p>two consecutive months in a calendar year on the allotment.</p>
<p>4b.2.8 Commercial and industrial activities, and home businesses</p>	<p>Support in part</p>	<p>Commercial and industrial activities should be restricted in the rural production zone. 100m² allowance is significant. This rule contradicts objective 3b.2.3</p>	<p>Amend 4b.2.8 (i)</p> <p>Any indoor or outdoor space used for commercial, industrial or home business purposes, shall have a gross floor area less than 10050m² for indoor activities, or 100m² of land area for and outdoor activities.</p> <p>Include PER for home business</p> <p><u>PER - 1</u></p> <p><u>The home business is undertaken within:</u></p> <ul style="list-style-type: none"> i. <u>a residential unit; or</u> ii. <u>an accessory building that does not exceed 40m² GFA; or</u> iii. <u>a minor residential unit.</u>

PER-2

There is no more than two full-time equivalent persons engaged in the home business who reside off-site

PER-3

Hours of operation are between:

7am-8pm Monday to Friday.

8am-8pm Weekends and public holidays.

- i. ~~Any indoor or outdoor space used for commercial, industrial or home business purposes, shall have a gross floor area less than 100m² for indoor activities, or 100m² of land area for outdoor activities.~~**
- ii. For home businesses the principal operator of the home business must be a permanent resident on the**

			<u>site to which the home business relates.</u>
4b.2.9 Maximum noise limits	Support		Retain
Noise - RX Frost Fans	New rule		<p>Include NOISE - RX</p> <p><u>PER-1</u> <u>The use is for the protection of crops from frost only</u></p> <p><u>PER-2</u> <u>Maintenance or use of frost fans is undertaken between 7am and 10pm. Testing outside these hours may only take place for urgent unforeseen maintenance purposes or for testing operational readiness.</u></p> <p><u>PER-3</u> <u>The maximum noise generated by a single or multiple frost fans shall not exceed 55 dB LAeq(15min) at any time when assessed within the notional boundary of any noise sensitive activity on another site</u></p> <p><u>PER-4</u></p>

Frost fans are only operated when the air at canopy height is 2 degrees C or less

Activity status when compliance not achieved:

RDIS

Matters of discretion are restricted to:

- **Operational requirements of frost control fans;**
- **Proximity to a residential area or dwelling including the visual effects;**
- **Noise mitigation measures;**
- **Generation of noise with special audible characteristics;**
- **Frequency and duration of operation**
- **Location, orientation**

Monitoring and reporting

<p>Noise - RX Audible bird scaring devices</p>	<p>New rule</p>		<p>Include NOISE - RX Activity status: Permitted</p> <p><u>Where:</u></p> <p><u>PER-1</u> <u>Bird scaring devices must only be used between 7.00am and 7.00pm on any calendar year</u></p> <p><u>PER-2</u> <u>Bird scaring events from any device shall operate at:</u></p> <p><u>Not more than 12 events per hour where an event includes clusters of up to three shots from percussing type devices or three individual shots from a firearm in quick succession</u></p> <p><u>A maximum noise level frequency of 65 dB LAE within the notional boundary of any noise sensitive activity not owned by the operator of the device</u></p> <p><u>PER-3</u></p>
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The audible bird scaring device complies with standard:

NOISE-4b.4.13 Maximum Noise Levels.

This standard does not apply to: bird scaring devices that generate a noise level less than 55 dB LAE within the notional boundary of any noise sensitive activity not owned by the operator of the device.

Activity status where compliance not achieved with PER-1 or PER-2: Restricted Discretionary

Matters of discretion are restricted to:

- **the level, hours of operation, duration and nature of the noise;**
- **proximity and nature of nearby activities and the adverse effects they may experience from the noise;**

			<ul style="list-style-type: none"> • <u>the existing noise environment;</u> • <u>effects on character and amenity values on the surrounding environment;</u> • <u>effects on the health and wellbeing of people; and</u> • <u>any noise reduction measures.</u> <p><u>Activity status where compliance not achieved with PER-3: Non-complying</u></p>
4b.2.13	Support	Support however recommend adding primary production activities to be consistent with National Planning definition	<p>Amend to be consistent with National Planning definition</p> <p>Nothing in the foregoing Performance Standards shall apply to primary production activities farm animals including working dogs, and to agricultural and forestry vehicles, agricultural and forestry machinery or equipment (including mobile plant at produce packing facilities but excluding sawmilling equipment), operated and maintained in accordance with the manufacturer's specifications in accordance with accepted management practices (e.g.</p>

			for milking, spraying, harvesting, packing, forest harvesting and the like).
4b2.15 Signage	Support in part	Allows for more signage coverage for rural retail and home business	<p>Maximum of one sign per allotment.</p> <p>i. Maximum total face area of sign = 2m². <u>The maximum total of sign area on any site must not exceed 3m². Where a sign is double-sided, the maximum sign area is calculated as the area of one side of the sign.</u></p> <p>ii. Signage must relate to the activity undertaken on the allotment.</p> <p>iii. No flashing, reflectorised or illuminated signage.</p> <p>iv. One temporary sign per allotment for the sale of land or buildings of not more than 2m² total face area. <u>There shall be no more than two signs per site.</u></p> <p>EXCEPTIONS: Official signs required by statute and warning signs related to</p>

			aspects of public safety are not required to comply with the standards.
Rural Lifestyle Performance Standards			
4b.4.6 Maximum building height	Support in part	Unclear why maximum building height is not the same as in the GRUZ	Amend i. The maximum height of a building shall not exceed 40 12 metres
4b.4.7 Minimum building setbacks	Support in part	A clear distinction should be provided for habitable buildings. 15 meters is considered insufficient to address potential reverse sensitivity effects.	Amend 4b.2.7 iii. 30 metre setback for habitable dwellings and minor residential units from the front boundary iv. 45 20 metres from all other boundaries. vii. <u>Artificial crop protection and support structures must be setback at least 1 m from all site boundaries</u>
4b.4.9 Home business, commercial, and retail activities	Support in part	Commercial and retail activities should be restricted in the rural lifestyle zone. 100m ² allowance is significant. This rule contradicts objective 3b.2.3	Amend Delete commercial and retail activities from the rule Include PER for home business <u>PER - 1</u>

The home business is undertaken within:

- i. a residential unit; or**
- ii. an accessory building that does not exceed 40m² GFA; or**
- iii. a minor residential unit.**

PER-2

There is no more than two full-time equivalent persons engaged in the home business who reside off-site

PER-3

Hours of operation are between:

7am-8pm Monday to Friday.

8am-8pm Weekends and public holidays.

Any indoor or outdoor space used for commercial, industrial or home business

purposes, shall have a gross floor area less than 100m²

for indoor activities, or

			<p><u>100m² of land area for outdoor activities.</u></p> <p><u>ii. For home businesses the principal operator of the home business must be a permanent resident on the site to which the home business relates.</u></p>
			<p>Amend</p> <p>Maximum one sign per allotment. <u>There shall be no more than one sign for each road frontage.</u></p> <p>ii. Maximum total face area - 1m².</p> <p>iii. Signage must relate to the activity undertaken on the allotment.</p> <p>iv. No flashing, reflectorised or illuminated signs.</p> <p>v. One temporary sign per allotment, 2m² total face area, for the sale of land or buildings. <u>The maximum total of sign area on any site must not exceed 1.5m². Where a sign is double-sided, the maximum sign area is calculated as the area of one side of the sign.</u></p>
4b.4.12 Maximum Artificial Light Level	Support in part	To align with Lux levels from other district plans	<p>Amend</p> <p>⊘ 10 LUX (lumens per square meter) at the boundary</p>

Subdivision			
<p>4b.5.1 Subdivision - General Rural Environment</p>	<p>Oppose in part</p>	<p>Unclear why there are two rules for subdivision based on lot size. A controlled activity subdivision status means that affected parties would not be consulted as part of the subdivision application. This is particularly relevant to the Rural Production Zone where the potential for adverse effects on adjoining land uses exist and effects on highly productive land which the plan seeks to protect. A controlled activity will not achieve that outcome.</p>	<p>Delete GRUZ from controlled activity rule</p> <p><u>Activity status - Restricted discretionary</u></p> <p><u>RDIS-1</u></p> <p><u>Where subdivision complies with standards:</u></p> <p><u>minimum lot sizes</u></p> <p><u>Requirements for building platform for each allotment</u></p> <p><u>Water supply</u></p> <p><u>Stormwater management</u></p> <p><u>Wastewater disposal</u></p> <p><u>Telecommunications and power supply</u></p> <p><u>Easements for any purpose</u></p> <p><u>Note: Text in yellow should relate to SUB standards however these have not been included in draft</u></p> <p><u>Matters of discretion are limited to:</u></p> <ul style="list-style-type: none"> <u>The potential adverse effects on adjoining horticultural and agricultural activities, including reverse sensitivity effects</u>

			<p><u>NOTE: Applications for restricted discretionary subdivision within the Rural Production Zone will be notified</u></p> <p><u>Activity status where compliance is not achieved - Discretionary</u></p>
<p>4b.5.2 Subdivision - Rural Lifestyle Environment that adjoins the General Rural Environment</p>	<p>Oppose in part</p>	<p>Unclear why there are two rules for subdivision based on lot size. A controlled activity subdivision status means that affected parties would not be consulted as part of the subdivision application. This is particularly relevant to the Rural Production Zone where the potential for adverse effects on adjoining land uses exist and effects on highly productive land which the plan seeks to protect. A controlled activity will not achieve that outcome.</p>	<p>Amend</p> <p>Subdivision resulting in lots that are 4 hectares or larger adjoining the General Rural Environment is a controlled activity. <u>restricted discretionary activity</u></p>
<p>4b.5.7 Subdivision - Outstanding Landscape Areas</p>	<p>Support in part</p>	<p>Subdivision of land particularly in the rural zone should be avoided regardless of lot size</p>	<p>Amend</p> <p>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.</p>

4b.5.8 Subdivision - Bonus lots	Oppose	The draft NPSIB requires councils to identify and map areas of SNA. Unclear why this rule has been drafted as contradicts....i (a) states Each Bonus Lot must correspond to no less than 4ha of a Nominated Significant Natural Area while c (i) states that the Bonus Lot(s) will not be located within any of the following - Significant Natural Area,	Delete rule
Strategic Direction Rural Environment			
SD - SX	New	Add new strategic direction for rural environment	<p>Add to chapter 38</p> <p><u>SD - RE-01</u></p> <p><u>Primary production activities are recognised and provided for to enable them to operate efficiently and effectively to ensure the contribution for the economic and social wellbeing of the district and not be compromised by inappropriate subdivision, use and development</u></p> <p><u>SD - RE - 02</u></p> <p><u>Protection of highly productive land from inappropriate development to</u></p>

			<u>ensure its production potential for generations to come.</u>
PC 38 Strategic Direction			
SD	Oppose in part	Council has no jurisdiction over the matters raised in 2.2	<p>Delete</p> <p>2.2 strategic direction freshwater quality / te mana o te wai</p> <p>The health and wellbeing of the lakes and rivers in the district have been degraded both directly and indirectly over recent decades. This degradation includes declining water quality, loss of indigenous biodiversity, loss of access and declining water availability and is the result of activities both on land and in the water bodies themselves. Waterways continue to face increasing demands for use, such as</p> <p>takes for irrigation and drinking water, hydro power generation, and assimilation of discharges from towns, agriculture and other industry; as well as pressures arising from land management practices, land use change and intensification. Holistic and integrated management of land and water resources is critical to reversing declining trends</p>

Organisation:

Waikato Regional Council

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

joapaulo.silva@waikatoregion.govt.nz

Daytime Phone: 079497179

- 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
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,

A handwritten signature in blue ink, appearing to read "Tracey May".

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
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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
(b) does not relate to trade competition or the effects of trade competition.

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 unreplacable 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://environment.govt.nz/national-policy-statement-for-highly-productive-land-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 outcomes, and values 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 māori land to facilitate māori occupation on their ancestral lands.</u>	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.



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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?

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.

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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: Kaaren

Last name: Rosser

On behalf of:
EnviroWaste Services Ltd

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Suburb:

City:

Country: New Zealand

Email: kaaren.rosser@environz.co.nz

Daytime Phone: 0275541065

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
Submission to Taupo District Plan PC38-43 Envirowaste

**ENVIROWASTE SERVICES LTD SUBMISSION ON THE TAUPO DISTRICT PLAN
CHANGES 38-43**

Submitter Details:

1. Name: Enviro Waste Services Ltd
2. Address for Service:
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PO Box 92810
Penrose
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Email: kaaren.rosser@environz.co.nz
3. Contact Person: Kaaren Rosser
Environmental Planner

Laurence Dolan
Environmental Manager
4. Date of Submission: 9 December 2022

Introduction:

5. Enviro Waste Services Limited (EnviroWaste) is the second-largest solid and liquid waste management company in New Zealand.
6. EnviroWaste owns and operates significant portions of the Country's waste management infrastructure including landfills, waste treatment facilities, recycling facilities and waste transfer facilities. EnviroWaste also provides waste and recycling collection services for Councils, businesses and households throughout New Zealand.
7. EnviroWaste operates waste and recycling collection services (including a materials recovery facility) within the Taupo District. It also manages the landfill at 132 Broadlands Road, Taupo, with all these services under contract to Taupo District Council.
8. The Broadlands Rd Landfill and transfer station is strategically located close to the Taupo town to minimise the cost of refuse haulage from the main urban development in the district. The location also allows for convenient disposal of refuse for the public and businesses of Taupo. There is a nearly 3-hour drive to the nearest consented Class 1 landfills with capacity for Taupo's refuse at Hampton Downs in the Waikato or Marton in

the Manawatu. Therefore, the landfill is of regional significance.



Figure 1: Broadlands Road Recycling Facility

9. As a materials management and resource recovery company, EnviroWaste is committed to managing, recovering and processing waste streams to deliver sustainable outcomes.

Scope of Submission

10. EnviroWaste makes this submission on the following plan changes:
 - Plan Change 38 (Strategic Directions)
 - Plan Change 42 (General Rural and Rural Lifestyle Environments)
 - Plan Change 43 (Taupo Industrial Environments)
11. Specific comments have been detailed in the table at **Appendix 1**.

General Comments on the District Plan Changes

12. In consideration of the Strategic Directions section of the District Plan, EnviroWaste considers that the Waste Management & Minimisation Plan for the Taupo District Council (2018-2024) is one of the documents that should inform the strategic direction of the District Plan. The Waste Management & Minimisation Plan seeks a goal to ensure “*waste and diverted material is managed in a safe and sustainable manner that maintains natural and aesthetic values*”. One of the objectives in achieving this vision is to “*Increase the quantity of diverted material through reduction, reuse, recycling and recovery.*”
13. To achieve these objectives, existing or planned waste facilities need to have sites that are distant to residential properties and any other sensitive receivers. Waste facilities are especially vulnerable to reverse sensitivity effects arising from the potential discharge of odour, dust and noise from these facilities. There are also high numbers of vehicle movements with respect to any waste facility.
14. Waste facilities can also take significant resources to design, consent and construct

facilities that minimise effects on the natural environment and nearby residents. To achieve continuing waste diversion, existing sites are likely to need upgrading to sort and handle different waste streams, or be expanded to handle increases in volumes. The equipment required to establish or upgrade a modern facility, that meets current environmental standards, is very capital intensive. Accordingly, it is important that waste facilities are recognised and provided for within the District, and also that their ongoing operation is protected from reverse sensitivity.

15. The submitter therefore proposes a rule for any subdivision within the General Rural Environment and Rural Lifestyle Environment which makes it discretionary within 1.5km of the landfill, detailed at Appendix 1.

Rural Lifestyle Zoning locations

16. EnviroWaste acknowledges that the proposed location of the new Rural Lifestyle zone along Centennial Drive is mostly away from the Taupo Landfill. EnviroWaste opposes any re-zoning of property to Rural Lifestyle within a 1.5km radius of the landfill. This is in consideration of the unique characteristics of landfills where reverse sensitivity effects arise from the potential discharge of odour, dust and noise from these facilities. If the proposed zoning is upheld, further subdivision of those properties closest to Broadlands Road (1.5km) can be controlled through the proposed new subdivision rule.

Infrastructure Definition

17. To ensure that waste facilities are provided for, the infrastructure definition should be amended to include regional resource recovery and disposal facilities (refer to Appendix 1). This will then remove the need to amend a number of strategic objectives and policies as listed within Appendix 1. Adding to this definition also acknowledges that waste management and disposal facilities are an essential part of the services needed for a society to function and aligns with the Natural and Built Environments Bill definition for infrastructure currently under consideration by government.

Industrial Land Supply

18. EnviroWaste opposes the rezoning of the Broadlands Road West land (Site 4). The submitter is concerned that certain commercial/commercial services or tourism activities can be established on this land under the current Taupo Industrial Environment zone rules. The Broadlands Road West land is sufficiently close to the landfill where subdivided sites may be exposed to adverse environmental and amenity effects from the operation of the landfill. It is the opinion of the landfill operator that use of the landfill will become increasingly difficult and costly to operate if sites are intensified with non-industrial uses in proximity to the landfill. Separation is most suitable form of mitigation to ensure continued operation.
19. While the submitter notes that the Broadlands Road West land is proposed to be identified as “sensitive” land, for which all land uses are a discretionary activity resource consent, the objectives and policies that refer to sensitive land only encompass landscape and geotechnical matters and not reverse sensitivity issues to significant infrastructure such as a landfill.
20. The submitter also notes that the Economic Multi-Criteria Analysis report, while assessing reverse sensitivity as a criterion for determining the most appropriate locations for

additional industrial land, only looked the potential industrial land in terms of **its** impact on residential and recreational areas. It did not assess the location of the industrial land in terms of its potential to create reverse sensitivity effects on adjacent land uses resulting from the types of activities that may establish there, given that commercial activities are permitted under the Taupo Industrial Environment Zone. The s32 report states that the Taupō Industrial Environment zoning (light industry and trade) was chosen to reduce loadings on wastewater infrastructure. Nowhere in the s32 assessment is the proximity to the landfill assessed for this site.

21. The relief sought by the submitter encompasses one of the following options:
- a) A landfill buffer is established on the Broadlands Road West land where certain types of non-industrial activities are non-complying via precinct rules; or
 - b) Delay the rezoning of Site 4 until such time as the Taupo Industrial Zone rules are updated in a subsequent plan change to limit the use of that land to compatible industrial activities, or introduce an overlay whereby uses that are not sensitive to the landfill are located within the boundaries of the overlay.
22. The submitter wishes to be heard in support of this submission.

Signed for and on behalf of EnviroWaste Ltd:



Laurence Dolan
Environmental Manager
MSc(Hons) Dip Nat Res



Kaaren Rosser
Environmental Planner
BSc, DipNatRes, CPlan, Assoc. NZPI

Section of Proposed Plan	Support/ Oppose	Specific Text Identified	Relief Sought	Reasons
10. Definitions				
Infrastructure definition		<i>.../ anything described as a <u>network utility</u> operation in regulations made for the purposes of the definition of “<u>network utility</u> operator” in section 166 of the Act.</i>	Addition of ‘ <i>.....(m) district or regional resource recovery and waste disposal facilities.</i> ’	The definition for infrastructure under the RMA excludes waste processing and disposal facilities, however the draft Natural and Built Environment Act includes ‘district or regional resource recovery or waste disposal facilities’. It therefore is sensible to include waste facilities as part of the infrastructure definition to provide for an easier transition to the new provisions, but more importantly so that the appropriate objectives and policies come into play in the Strategic Directions chapter, particularly at 2.3 and 2.5. Without inclusion in the definition, none of these objectives and policies will operationally apply to the regional landfill or transfer stations, etc, in the Taupo area. This will then help to ensure that activities which may result in reverse sensitivity effects do not establish in close proximity to these sites but most particularly, the landfill.
Chapter 2 Strategic Directions				
Objective 2.3.2.1	Support with amendments	<i>Development is serviced by an appropriate level of infrastructure that effectively meets the needs of that development.</i>	Addition of ‘ <i>.....an appropriate level of infrastructure and waste facilities that effectively meets...</i> ’	If the addition to the infrastructure definition is not accepted as above, then the continuance and expansion of waste recovery and disposal facilities needs to be included in the Strategic Directions chapter and be part of this relevant objective. The submitter considers that amending the infrastructure definition is preferable to specifically referring to waste facilities in the Strategic Directions chapter.
Objective 2.3.2.6	Support	<i>Subdivision, use and development will not detract from the planned urban built form and effective functioning of the environment which it is located.</i>		This objective will partially support the functionality of the regional landfill.
Policy 2.3.3.5	Support with amendments	<i>Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure (including development and additional infrastructure), according to the capacity limitations of that infrastructure</i>	<i>Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure (including development and additional infrastructure (such as waste facilities), according to the capacity limitations of that infrastructure.</i>	If the addition to the infrastructure definition is not accepted as above, then waste facilities need to be specifically defined as they are excluded from the definition of infrastructure and therefore cannot be considered as infrastructure.
Policy 2.3.3.10	Support	<i>Manage subdivision.... d. give rise to reverse sensitivity effects from existing uses.</i>		This objective will help support the continuance and operational ability of the regional landfill, and the functionality of industrial zones.
Policy 2.4.3.2	Neutral	<i>Land use activities which will unduly accelerate the effects of climate change will be discouraged.</i>		While it is acknowledged that waste minimisation is necessary to meet particular climate change outcomes, refuse transfer stations and waste treatment and disposal facilities will still be required by the community. Interpreting Policy 2.4.3.2 will therefore be key in whether new facilities or the consenting of existing facilities will be acceptable when an activity such as a landfill has a complex climatic footprint. The policy should identify the mechanisms by which complex climatic footprints

				are assessed.
Section 2.5	Support with amendments	Paragraphs 1, 4 and 5	<p><i>...and any other network utilities undertaken by network utility operators. Waste recovery, treatment and disposal facilities are also critical services.</i></p> <p><i>...The Taupo District is also home to Regionally Significant Infrastructure including municipal waste water systems, the telecommunications and electricity networks, and a regional landfill.</i></p> <p><i>...In addition to nationally and regionally significant infrastructure, local roads and other infrastructure (including development and additional infrastructure (such as waste facilities)) is vital...</i></p>	<p>As the current definition for infrastructure under the RMA and the current District Plan excludes waste facilities, the continuance and possible expansion of these facilities needs to be included in this section, unless the amendment to the infrastructure definition is accepted as above.</p> <p>As stated above, a change to the infrastructure definition is preferable to avoid altering paragraphs 1 and 5.</p> <p>The submitter considers that the Taupo Landfill should be included in the regionally significant infrastructure list in any case, given its regional status.</p>
Objective 2.5.2.3	Support with amendments	<i>Land use in the District will not adversely affect the capacity and the safe and effective functioning of nationally and regionally significant and local infrastructure required to service existing and future communities</i>	<i>Land use in the District will not adversely affect the capacity and the safe and effective functioning of nationally and regionally significant and local infrastructure (including waste facilities) required to service existing and future communities.</i>	As the current definition for infrastructure under the RMA and the current District Plan excludes waste facilities, the continuance and possible expansion of these facilities needs to be included in this section, unless the amendment to the infrastructure definition is accepted. As stated above, a change to the infrastructure definition is preferable.
Policy 2.5.3.3	Support with amendments	<i>Subdivision, landuse and development will not adversely affect (including reverse sensitivity effects) the effective and safe functioning of infrastructure</i>	<i>Subdivision, landuse and development will not adversely affect (including reverse sensitivity effects) the effective and safe functioning of infrastructure (including waste facilities).</i>	As the current definition for infrastructure under the RMA and the current District Plan excludes waste facilities, the continuance and possible expansion of these facilities needs to be included in this section, unless the amendment to the infrastructure definition is accepted. As stated above, a change to the infrastructure definition is preferable.
3b Rural Environment Chapter				
Objective 3b.2.4 Other Activities	Support with amendments	<i>Māori cultural activities, tourism activities, visitor accommodation and renewable electricity generation and transmission activities are enabled in the General Rural Environment.</i>	<i>Māori cultural activities, tourism activities, visitor accommodation and renewable electricity generation and transmission activities are enabled in the General Rural Environment where compatible with existing and planned</i>	Some tourism activities and visitor accommodation are not compatible in proximity to the regionally significant landfill. The additional text seeks to qualify the general enabling clause so that unintended consequences do not arise.

			<i>character.</i>	
Objective 3b.2.5 Avoidance of reverse sensitivity	Support	<i>Reverse sensitivity effects on permitted and legally established activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided.</i>		This policy is supported as legally established activities include the Taupo landfill as an example of an activity that can be subject to reverse sensitivity.
Objective 3b.2.6 Impacts on Infrastructure	Support with amendments	<i>The impacts on infrastructure arising from subdivision and development are managed.</i>	<i>The impacts on infrastructure (including waste facilities) arising from subdivision and development are managed and where necessary avoided.</i>	While some infrastructure needs management, other infrastructure needs protection from the effects of encroaching subdivision and development. The objective is too wide in its current application. See comments elsewhere in submission regarding reverse sensitivity.
Policy 3b.2.10	Support with amendments	<i>Avoid the cumulative effects of rural lifestyle development by limiting residential units that: a) Increase the demand for community infrastructure and services b) Result in the inefficient use of land or loss of future flexibility for productive uses c) Erode the general rural character through its density, scale and location.</i>	<i>Avoid the cumulative effects of rural lifestyle development by limiting restricting residential units that:</i>	This policy needs to be strengthened to avoid the cumulative effects of eroding of rural character and to maintain a low intensity of residential buildings. At the very least, replacing the word limiting for restricting will aid in achieving this aim. Otherwise EnviroNZ is concerned that as additional dwellings are only a discretionary activity, reverse sensitivity issues will occur for regional infrastructure and the regional landfill.
Policy 3b.2.13 Avoiding reverse sensitivity	Support	<i>Any adverse effects generated by an activity must be managed within the allotment so as to avoid adversely affecting permitted and lawfully established neighbouring activities.</i>		
Policy 3b.2.14 Commercial and industrial activity	Support with amendments	<i>Limit the scale of commercial and industrial activity (unless necessary for regional or national infrastructure) and avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary production activities within the General Rural Environment.</i>		The submitter is concerned that some regional/national industrial infrastructure activities may have a functional need to be located in the rural environment and need sufficient space to do so.
New Objective for quarries,			<i>Restrict quarries, cleanfills and managed fills so that they should not adversely affect or</i>	While we note this objective was rejected in the draft form of the District Plan we consider that it is important that these facilities are considered and consented appropriately as they are important rural uses and necessary for development. By restricting their establishment to

cleanfills and managed fills			<i>inhibit the use of surrounding land for productive purposes or for carrying out permitted or consented activities; and their completed state should be in keeping with the appearance, form and location of existing rural character and amenity values.</i>	defined parameters, their appropriateness can be assessed.
Objective 3b.3.2 Avoid reverse sensitivity	Support	<i>Adverse reverse sensitivity effects, including conflict with permitted and legally established activities in neighbouring Environments, are avoided.</i>		This objective is supported as legally established activities include the Taupo landfill as an example of an activity in a neighbouring Environment that can be subject to reverse sensitivity.
Policy 3b.3.10 Lot sizes and setbacks for allotments adjoining the General Rural Environment	Support	<i>Require larger lot sizes and greater building setbacks for allotments adjoining the General Rural Environment to manage reverse sensitivity.</i>		This policy is supported.
Rule 4b.4.4 Maximum Density of residential units	Support	<i>...ii. One residential unit per 4 hectares for lots adjoining the General Rural Environment</i>		This policy is supported to reduce reverse sensitivity on existing land uses within the General Rural zone, such the landfill, with exception of those within 1.5km of the Taupo landfill where a buffer should apply and density should be controlled.
Rule 4b.4.7 Minimum building setbacks	Support	<i>...iii. Dwellings and minor residential units shall be setback a minimum of 50 metres from the General Rural Environment</i>		This policy is supported to reduce reverse sensitivity on existing and permitted land uses within the General Rural zone, such the landfill.
Rule 4b.5.1 Subdivision – General Rural Environment	Oppose	<i>i. Subdivision resulting in lots that are 10 hectares or larger is a controlled activity.</i>		The controlled activity status is opposed as it could potentially increase the number of sites and dwellings within proximity (1.5km) of the Taupo Landfill. Any subdivision within 1.5km of the landfill needs to be a discretionary activity.
New rule 4b.5.6vi			<i>Any subdivision of land in the General Rural Environment or Rural Lifestyle Environment that is located with Area Z on Planning Map ? is a discretionary activity.</i>	Creating a new buffer “Z” around the landfill where subdivision is carefully assessed and managed will enable the landfill to continue operation and have less effects from reverse sensitivity as development encroaches.
Rule 4b.5.8 Subdivision – Bonus Lots	Oppose	<i>The creation of one or more Bonus Lots 4ha or greater within the General Rural Environment is a Restricted Discretionary activity....</i>		The subdivision size of 4ha is opposed where it will result in increased lots in the proximity (1.5km) of the Taupo Landfill. If the above new rule is adopted then this would provide relief unless bonus lots do not come under ‘any subdivision’.



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Last name: Lenihan

On behalf of:
Rangatira Block Trusts

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Suburb: Epsom

City: Auckland

Country: New Zealand

Postcode: 1051

Email: johnle@rcg.co.nz

Daytime Phone: 021817336

- 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:

As we are submitting on behalf of 7 Maori Trusts with 8000 owners, we would like 2 hours at the hearing.

Attached Documents

File
2022-12-07_Submission Taupo Proposed District Plan Changes 38 to 43

Taupo District Council
Private Bag 2005
Taupo Mail Centre
Taupo 3352

Email: districtplan@taupo.govt.nz

Dear Sir/Madam

Submission to Proposed Taupo DC Plan Changes 38 - 43 (PPC 2022) – RMA Form 5

Submitters

- Rangatira E Trust
- The Proprietors of Hirharama Ponui Block
- Rangatira Point Incorporation
- Paenoa te Akau Trust
- Rangatira 8A14A (Paenoa Te Akau Block)
- Rangatira 8A16 (61 Huka Falls Rd)
- Rangatira 8A17 (Nukuhau)

Consultant lodging submission:
C/O RCG Ltd
PO Box 9672 Newmarket 1148
Attn: John Lenihan
Email: johnle@rcg.co.nz
Ph: 021817336

Introduction and Background

The above submitters could not gain an advantage in trade competition through this submission.

The submitters are all significant Maori land holding trusts who own all the undeveloped land on the western side of the river, from Rangatira Park, part of Nukuhau, through Acacia Bay to Rangatira Point; an area of 1500 hectares. The Submitters represent the interest of over 8,000 individuals who are mana whenua of land in Taupo and are directly impacted by these plan changes.

The Council's Strategic Plan 2050, recognised these landowners as significant with an important interest in the development of the city and region.

The submitters have been engaged with Council executive for the last 18 months on their development aspirations for their land. Master planned communities of commercial and residential use have been provided to the Council for comment and feedback. The

Submitters are a group with a large landholding who are working together to bring change and sustainable management of land capable of development to the district. The aspirations of the Submitters is to provide for the community at large and the mana whenua. This requires exploration of commercial opportunities and arrangement with Council and the Crown to open this land up.

Taupo is not alone in going on this journey. Tauranga has worked with Maori land trusts to open land for development in Papamoa. Hamilton and Rotorua have worked with mana whenua to develop Maori land blocks. The Submitters wish to work with Council to deliver the Taupo 2050 strategy.

The recent engagement with the Council has been instigated by the Submitters. However, the Council's response had been limited and not particularly open. Taupo District Council has not been collaborative. There has been a long history of Council not informing the Submitters on planning issues that impact them, or consulting the Submitters proactively. As the Council is aware there is an explicit duty to involve mana whenua in planning decisions. A partnership that promotes collaborative decision making would benefit the Taupo District and all its people.

Commentary on Proposed Plan Changes

Proposed Taupo DC Plan Changes 38 - 43 (**PPC 2022**) is described by the Council as being the first bundle in a series of plan changes aimed to ensure the District Planning framework is operating efficiently and effectively. Since the plans were notified, the Natural and Built Environment Bill has been introduced and open for submission, along with the Spatial Planning Bill. In looking at the resource management reforms, it is clear that the aim of the new framework is to ensure mana whenua have a say over the development of their land and any district in which they own land. The new framework promotes partnership and collaboration.

PPC 2022 is an opportunity for the Taupo council to lead. As such the submission focuses on changes the Submitters wish to see implemented to allow for a wider range of activities to take place on their land – instead of limiting development to Papakainga with no access to commercial, industrial or lifestyle activities. The Submitters view is that the Council has to engage with the Submitters as land owners to ascertain the needs of the whole community.

Instead, the Council has set a new Strategic Direction (**PPC 38**) which seeks to limit the capacity and use of the property owned by the Submitters. No basis for this approach has been outlined in the section 32 reports.

There is no meaningful mention in the PPC 2022 as to engagement with the Submitters. For instance whilst some members of the community were involved in the pre-consultation phase between 13 May and 13 June 2022 and preparation of background documents that became the section 32 reports, the Submitters were not approached – not as a collective or as individuals. Some of the Submitters, using their own initiative met with Council staff on 11 April 2022, but that was a short engagement and did not result in meaningful follow up discussions. That one meeting certainly has not transformed into planning provisions that allow mana whenua to provide for their beneficiaries into the future by using land to provide opportunities.

Draft plan provisions were not as stated in the section 32 report, tested with the Submitters. This formal submission process is the first opportunity the Submitters have had to provide feedback to the Council on PPC 2022. The Submitters consider the Council's approach to be disrespectful to the mana whenua interests. Meaningful consultation is required to develop a framework that allows the Submitters to participate in the same manner as other parties in the District.

The Submitters, despite owning the most significant land-holding adjacent to Taupo township, have not been invited to be part of the Iwi Reference Group, or considered an "Iwi Partner" and this is in spite of the Submitters making this request in writing for inclusion in the District Plan Change process.

The submitters consider they are directly affected by the PPC 2022 and request to be heard in relation to this submission. Two hours is requested to be heard given the number of land owning trusts that form the Submitters group.

The submission is a summary of issues only. The Submitters may produce further submissions and evidence at the hearing.

Comments on each plan change as follows

PC 38 Strategic Directions

Submission	Stance	Reasons	Decision Requested
2.1 Tangata Whenua	Support		
2.1.2 Objectives	Support		
2.1.3 Policy Item 5	Object/Amend	This policy wording is ambiguous and can be interpreted that Maori Multiple owned land should remain as under-utilised and un-developed.	Amend by adding to the policy that public structure planning processes would enable the re-zoning of land and provision of infrastructure to remove constraints and enable development of Multiple Maori owned land.

Submission	Stance	Reasons	Decision Requested
2.1.3 Policy Item 6	Object/amend	The wording of this policy does not recognise that the District Plan and supporting documents such as TDC 2050 growth Strategy (2018) do not have the provisions to enable development, the current provisions have restrained development.	Amend by removing “within the provisions of the plan”
2.3 Urban Form & Development	Object/amend	The District Plan does not provide a framework for urban development on multiple Maori owned land. Existing urban areas including the Town Centre have been protected at the expense of Maori land.	Amend to add to the second paragraph after 2050 “ and supports urban development on Multiple Māori owned land.”
2.3.2 Objectives Item 2	Object/amend	TD2050 (2018) discounted multiple maori owned land from future development, and infrastructure solutions have excluded maori landowners from involvement with capacity strategy and solutions	Amend after 2050 2018“ and to support urban development on Multiple Māori owned land, to maximise efficient use of potential unzoned & unserviced Maori land along with existng...”
2.3.2 Item 6	Object/amend	Multiple Maori owned land is currently not part of the planned urban built form & so this objective is written ambiguously and can be interpreted to be exclusionary of Maori land. In order for something to	Item 5 already supports the Town Centre Environment as the “primary” centre. Remove objective 6 as un-necessary and poorly defined.

		<p>detract from form and function – that form and function has to be detailed.</p> <p>This is a poorly written objective.</p>	
2.3.3 Policy Item 3	Object/amend	<p>TD2050 (2018) discounted multiple maori owned land from future development, and infrastructure solutions have excluded maori landowners from involvement with capacity strategy and solutions</p>	<p>Amend after 2050 2018“ and to support urban development on Multiple Māori owned land, to maximise efficient use of potential unzoned & unserviced Maori land along with existing ...”</p>
2.3.3.Ploicy Item 4	Object/amend	<p>The introduction of “fragmented development” requires some explanation, Taupo by virtue of geography and geology is fragmented. The current lack of exisitng and planned infrastructure on the western side of the river is resulting in inefficiencies elsewhere and detrimental to the development of Multiple owned Maori land.</p> <p>Item 5 covers the issue of efficient and effective infrastructure and landuse.</p>	<p>Remove item 4</p>
2.3.3 Policy Item 7	Object/amend	<p>Development on maori land should not just be restricted to Papakaiinga.</p>	<p>Remove “the “ and “of papakainga”</p>

Submission	Stance	Reasons	Decision Requested
2.3.3 Policy Item 8	Object/amend	<p>This is a poorly drafted policy that confuses non-residential “activity” with the “built form” of residential neighbourhoods, and the use of the term “boundaries”. Either this is a policy about the scale of built form or a policy about the scale of activities.</p> <p>What residential neighbourhoods are being “protected” from is also unclear. Maori land has a history and culture of being mixed use. Contemporary urban planning advocates for mixed use activity , with the scale of activity and therefore the scale of built form being determined by transportation systems, public service provisions, and environmental attributes.</p>	Amend to remove this policy
2.5 Infrastructure	Object/Amend	There is no mention of developing infrastructure to enable development of Māori land, and recognition that Māori land has been disadvantaged historically by investment decision making of Council and its District Plan	Include maori land in the objectives and policy section wording.
2.6	Natural Object/Amend	Maori land has been left	Objectives and Policy

Environment Values		in a more natural state due to a framework of statutes and planning practices and a legal system based on freehold property . This has restricted the development of Maori land. The loss of environmental values, character and amenity on other land should not be a burden to remedy on Maori landowners, where maori land is treated as reserves or to be protected.	wording needs to be changed to include the ability for Maori-landowners to determine how they develop their land and what should be protected, enhanced or mitigated.

PC42 General Rural & Rural Lifestyle Environments

Submission	Stance	Reasons	Decision Requested
3b.1 Introduction	Object/Amend	The District Plan should recognise that Maori land has most often been forced into a rural zoning status by statutes, court rulings and planning frameworks, usually against the wishes of Maori landowners or without consultation. The new provisions of the RMA and other relevant legislation has recognised that Māori are entitled, within certain limits, to develop practices and exploit their resources by acquiring and adapting new skills and technology in the same way as other communities	Amend wording to incorporate this reasoning.
3b.1 Rural Lifestyle	Object/Amend	Council has identified 5000 hectares of rural land for re-zoning as Rural Lifestyle of which	amend to reject the all the sites identified in the maps for re-zoning and rezone the

		4000 hectares are on the western side of the Waikato River, non of this land is multiple owned maori Land. All of it sits further beyond The Rangatira blocks. There has been no consultation in regards to the proposed zone maps despite the submitters idenitfing to Council their desire for this zone on their land, which is capable of providing all the desired outcome in the plan change documents	Rangatira blocks
Policy 3b.2.9 (e)	Object/Amend	The introduction of Rural Industry will require frequent regular vehicle movements to function. The existng Rural Environment also functions on regular and frequent vehicle movements . Defining a Rural character based on infrequent vehicle movements is ambiguous and poorly considered	Remove item (e) from the objective.
Rule 4b.2.8	Object/amend	The use of “Commercial and Industrial” purpose is ambiguous relative to the new definition of Rural Industry. A maximum building size in standard 4b2.3 of 5000sqm gross appears contradictory with this standard of a restriction to 100sqm gross. This standard is the same as the Rual Lifestyle standard which suggests there has been an error.	Amend wording for clarity and co-ordination of standards.

PC 43 Industrial.

Submission	Stance	Reasons	Decision Requested
	Object/Amend	The District Plan should recognise that Maori land has most often been forced into a rural zoning status by statutes, court rulings and planning frameworks, usually against the wishes of Maori landowners or without consultation. The new provisions of the RMA and other relevant legislation has recognised that Māori are entitled, within certain limits, to develop practices and exploit their resources by acquiring and adapting new skills and technology in the same way as other communities	Amend to zone part of the Rangatira E land as industrial as the section 32 evaluation & methodology are flawed and had no regard for the RMA requirement to consider the development of maori owned land as to the following;

This Plan Change is to simply rezone rural land to increase the Industrial land supply in Taupo.

Council identified 8 sites with proximity to the urban area with proximity to supporting infrastructure. 7 of the sites are all on the east side.

The Rangatira E option was added due to it being tabled to Council in a meeting in April 2022.

A Total of 285 hectares was considered in the section 32 report with only one Maori owned block (20% of the total land considered) with a narrow and non-evidence based assessment

24.5 hectares on 2 blocks made the final selection for re-zoning . Council had identified that 80-90 hectares of new industrial land would be needed by 2053. The 24.5h may fulfil the 10 year projected requirement only.

Objection is based on a flawed section 32 evaluation & methodology that excluded the benefits to the Maori community, their economy & environment has not been identified & assessed- despite our masterplan shared with Council consultants preparing s32 reports. No input from iwi owners has been included. The rationale and analysis from the Maori/iwi perspective is lacking entirely. Maori involvement in Industrial development has not been addressed.



First name: David

Last name: Grey

On behalf of:
Rangatira 8A11D(Paenoa Te Akau)

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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.

Consultation Document Submissions

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.1 Strategic Direction 1
Tangata Whenua > 2.1.3 Policy **Points: 45.1**

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

Support

Retain,

There seems to be no proactive decisions to protect these taonga because people either do not know, do not care or want to erase.

Solutions, would be to identify, protect, apply privacy/respect to certain areas identified, and maintain, using a competent local maori advisory that respects whakapapa, pono and the preservation of our stories.

Depending on sensitivity, protection from public would be an option also.

The isolation from surveying which made its inception in the late 1860's is what cut our peoples connection to the whenua. Money that came with these new frameworks then distorted relationships and stories. A lot has been lost, and perspectives have changed but, not all is lost.

These taonga are the umbilical from the whenua to its descendants, whakapapa is a the map to navigate this umbilical and its stories.

Getting assistance to protect these taonga gives an opportunity for local Rangatahi to clear the fog connecting themselves with who they are finding an old perspective which burns the tinder inside them, whakapapa has no business being public knowledge, but is a huge asset for maori and their identity.

Once again, creating an insurance from further desecration by preserving and protecting what is left, we can enrichen our tangata whenua and our community emboldening a mana together, building together.

Include reason(s) for your submission point

2.1.3 Policy

1. Recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu (sacred sites), and other taonga (treasures).

Support.

This provision is paramount in regards to the Rangatira area of Taupo, now known as Rangatira pt, Hiruhama Ponui, Paenoa Te Akau, and Rangatira E, and its Tangata whenua.

These ancestral lands are packed with history that can educate not only its descendants but the Taupo community that will only enrichen our local identity.

If there were to be any development in housing of this area, this provision would also be vital building better relationships between a spectrum of communities prioritizing our hapu's mana, protecting and identifying what is left of taonga, wahi tapu, and urupa.

Without acknowledgement, or protection of this. History has proved that this a detriment to local iwi and a burden to making positive changes building our community as a whole.

Attached Documents

File
No records to display.



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- I could not

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- a. adversely affects the environment, and
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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 LIA s 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

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- I could
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Gain an advantage in trade competition through this submission

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

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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 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.3 Strategic Direction 3 Urban Form and Development > 2.3.3 Policy **Points: 57.1**

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

Seek amendment

Amend to read as follows:

2.3.3 Policies

...

5. Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure (including development ~~and of~~ additional infrastructure), according to the capacity limitations of that infrastructure.

...

7. Provide for the development of Papakāinga on ~~m~~Māori land to facilitate ~~m~~Māori occupation on their ancestral lands.

...

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 district's pre-eminent retail, commercial and mixed-use centres.

10. Manage subdivision use and development of land to ensure that it will not:

- a. have an adverse effect on the functioning of the environment where it is located,
- b. unduly conflict with existing activities on adjoining properties ~~and the surrounding areas,~~
- c. compromise development consistent with the intent and planned urban built form of the environment where it is located
- d. give rise to reverse sensitivity effects ~~from existing uses.~~

...

Include reason(s) for your submission point

There are a number of typos that need to be corrected and other edits.

Conflicts need to be avoided with activities in the wider surrounding environment, not just on adjoining properties.

Reverse sensitivity effects do not arise from "existing uses". They arise from new or expanded sensitive activities locating in proximity to existing uses.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.4 Strategic Direction 4 Climate Change > 2.4.2 Objective **Points: 57.2**

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

Seek amendment

2.4.2 Objectives

...

2. An increase in the amount of electricity generated from renewable sources within the Taupō District to assist with the decarbonisation of the economy.

23. Subdivision, use and development of land in the Taupō District will be resilient to the current and future effects of climate change on the District's current and future communities, including any disproportionate effects on ~~m~~Māori.

34. The Taupō District is well prepared to adapt to the risks and effects from climate change, such as natural hazards.

Include reason(s) for your submission point

A new objective needs to clearly articulate the desirability of increased renewable electricity generation to assist with the decarbonisation of the economy (both within the Taupō District and nationally).

Typos / Grammar

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.4 Strategic Direction 4 Climate Change > 2.4.3 Policy **Points: 57.3**

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

Seek amendment

2.4.3 Policies

1. Land use activities which will result in positive climate change outcomes, including through reducing greenhouse gas emissions and decarbonisation, will be supported and ~~encouraged-enabled~~.

2. Recognise and provide for the use and development of the District's renewable energy resources to facilitate decarbonization of the economy, including a reduction in greenhouse gas emissions, increased electricity generation capacity and improved security of supply including transmission.

3. Enable the upgrading and maintenance of existing and development of new renewable electricity generation activities and transmission, including where contributing to one of the following:

- adaptation required to mitigate risks from climate change
- provides for increased electricity output, or greater efficiency

continued safe, efficient and secure operation

24. Land use activities which will ~~unduly~~ accelerate the effects of climate change will be discouraged.

35. 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.

46. Subdivision, use and development of land must demonstrate resilience to the effects of climate change over time.

Include reason(s) for your submission point

The New Zealand Energy Strategy 2011 has set a target that 90 percent of electricity generation will be from renewable sources by 2025. Using more renewable resources to meet energy demand will reduce dependence on fossil fuels which are a finite resource and reduce carbon dioxide emissions, which contribute to global warming and climate change effects. These approaches are also consistent with the National Policy Statement on Renewable Electricity Generation, 2011.

Typos / Grammar

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.5 Strategic Direction 5

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

Seek amendment

Amend 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 **and protected** in decision making and land use planning.

2. The local and national benefits of the sustainable development, operation, maintenance and upgrading of electricity transmission and renewable electricity generation resources and activities are recognised and **encouraged achieved**.

...

Include reason(s) for your submission point

The National Planning Statement Renewable Electricity Generation in Policy A states that Decision-makers shall recognise and provide for the national significance of renewable electricity generation activities, including the national, regional and local benefits relevant to renewable electricity generation activities. Manawa Energy is seeking for more than recognise and encourage and that Renewable Electricity Generation is provided for in District Planning.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.5 Strategic Direction 5 Significant and Local Infrastructure > 2.5.3 Policy

Points: 57.5

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

Seek amendment

Amend as follows:

2.5.3 Policies

1. Recognise and provide for the national, regional and local benefits of renewable **energy electricity** generation activities and resources, and transmission activities, in relation to climate change, security of supply, and social, and economic wellbeing of people and communities and for their health and safety.

2. Recognise **and provide for** the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure.

...

Include reason(s) for your submission point

The introduction should more accurately refer to "electricity generation", not "energy generation". One of the laws of physics is that energy cannot be generated. It can only be transformed from one form to another. The NPS Renewable Energy has been in effect since 2011 and with current renewable electricity goals from the government it is no longer enough to simply recognise the role renewable energy but as per the NPS: REG Policy A that Councils should provide for renewable electricity generations.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.6 Strategic Direction 6 Natural Environment Values > 2.6.3 Policy

Points: 57.6

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

Seek amendment

Amend as follows:

2.6.3 Policies

...

7. Recognise the benefits of offset measures and compensation and provide for their use as feasible alternatives to manage significant residual adverse effects of renewable electricity generation activities and regionally significant infrastructure.

Include reason(s) for your submission point

Manawa seek the inclusion of an additional policy that covers an increasingly important aspect of consenting renewable electricity generation activities.

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

Points: 57.7

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

Oppose

Amend as follows:

Rural Industry – 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.

Insert a new definition of Renewable Electricity Generation as follows (being the same definition in the NPS-REG):

Renewable electricity generation means generation of electricity from solar, wind, hydro-electricity, geothermal, biomass, tidal, wave, or ocean current energy sources.

Insert a new definition for Renewable electricity generation activities (being the same definition in the NPS-REG) as follows:

Renewable electricity generation activities means the construction, operation and maintenance of structures associated with renewable electricity generation. This includes small and community-scale distributed renewable generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.

Insert a new definition for reverse sensitivity (being the definition in the Waikato RPS) as follows:

Reverse sensitivity is the vulnerability of a lawfully established activity to a new activity or land use. It arises when a lawfully established activity causes potential, actual or perceived adverse environmental effects on the new activity, to a point where the new activity may seek to restrict the operation or require mitigation of the effects of the established activity.

Include reason(s) for your submission point

Manawa opposes the view that Renewable Electricity Generation are recognised as ‘Rural Industry’. The 20 power generation facilities within the existing rural environmental in the Taupo District are located there, as there is a functional need to be located where energy resources exist. They are not simply a ‘Rural Industry’ because they are located in a ‘Rural Environment’. They are ‘Renewable Electricity Generation’ activities located in the Rural Environment.

Renewable electricity generation is an activity that has been recognised in the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG) as a matter of national significance. Renewable electricity generation is also an activity identified in the Waikato and BoP RPS as a Regionally Significant Infrastructure. It is therefore inappropriate to treat that activity as part of, and in the same manner as, other activities that occur in the rural environment such as forestry, agriculture and dairy farming. The elevated status and importance of renewable electricity generation should be recognised in the Taupō District Plan with its own set of objectives, policies and methods.

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.2.1 Enable Primary Production **Points: 57.8**

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

Seek amendment

Amend as follows:

Objective 3b.2.1 Enable Primary Production and the Use of Natural Resources

Primary production and the use of natural resources are enabled by protecting the availability of the rural land and other resources and its their productive capability.

Include reason(s) for your submission point

Manawa supports Objective 3b.2.1 with an amendment so that it covers a wider range of uses anticipated in the General Rural Environment beyond just “primary production”.

In accordance with s75(3) of the RMA District objectives and policies must give effect to existing RPS objectives and policies. Objective IM-02 in the Waikato RPS is ‘Resource Use and Development’. One of the policies which achieves objective IM-02 is IM-P4 ‘Regionally Significant industry and primary production’. Our suggested amendments give effect to the Waikato RPS.

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.2.2 Maintaining the established General Rural character **Points: 57.9**

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

Seek amendment

Amend as follows:

Objective 3b.2.2 Maintaining the established General Rural character

~~The established character of the General Rural Environment is maintained and the cumulative erosion of its character through incremental subdivision and development is avoided. Enable a range of activities in the General Rural Environment that are compatible with rural character.~~

Include reason(s) for your submission point

The established character of the General Rural Environment may not represent a good environmental outcome to the extent that it should be “maintained”. An objective that seeks to maintain the “established character” is essentially seeking no change. The objective seeks to avoid “incremental subdivision and development” which essentially locks in the status quo and will make it difficult for any new development to occur, including new development that has been identified in other planning provision as being appropriately located in the General Rural Environment.

The wording of some of the existing planning provisions in the Rural Environment have been proposed as alternative wording for Objective 3b.2.2.

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: 57.10**

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

Seek amendment

Insert new objective as follows:

Objective 3b.2.X Renewable Electricity Generation and Transmission Activities

Enable the development, operation, maintenance and upgrading of renewable electricity generation activities and transmission activities in the General Rural Environment.

Include reason(s) for your submission point

Due to its elevated status under the NPS-REG, Manawa has sought (above) that the definition of Rural Industry be amended to delete any reference to electricity generation and that a new definition of Renewable Electricity Generation and Renewable Electricity Generation Activities be including in the Plan. In line with that outcome, a new objective needs to be included in the Plan seeking to enable renewable electricity generation activities (and transmission activities by association).

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: 57.11**

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

Seek amendment

Amend as follows:

Māori cultural activities, tourism activities, ~~and~~ visitor accommodation ~~and renewable electricity generation and transmission~~ activities are enabled in appropriate locations within the General Rural Environment.

Include reason(s) for your submission point

As a consequential change to the relief sought above (inserting a new objective in relation to renewable electricity

generation activities), Objective 3b.2.4 needs to be amended to remove the reference to renewable electricity generation (and transmission by association).

Visitor accommodation is a sensitive activity and should only be enabled in appropriate locations within the General Rural Environment rather than enabled anywhere including in locations whereby reverse sensitivities could arise.

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.2.5 Avoidance of reverse sensitivity **Points: 57.12**

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

Seek amendment

Amend as follows:

Reverse sensitivity effects on permitted, ~~and~~ legally established, ~~and/or consented~~ activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided.

Include reason(s) for your submission point

The scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already exists. The objective needs to also cover consented activities which have yet to be constructed / undertaken.

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: 57.13**

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

Seek amendment

Amend as follows:

The impacts ~~on infrastructure~~ arising from subdivision and development ~~are managed do not compromise the safe and efficient functioning of infrastructure.~~

Include reason(s) for your submission point

An objective (or policy) that only seeks to "manage" something (with no specified outcome) does not provide useful guidance to resource management decision makers or other users of the Taupō District Plan.

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: 57.14**

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

Oppose

Amend as follows:

Policy 3b.2.9 ~~Maintaining the established Rural~~ character

Enable activities in the ~~Maintain the established~~ General Rural Environment that will not compromise the character of

the General Rural Environment, as defined by:

- a) Extensive pastoral farming and forestry
- b) Structures associated with Renewable Electricity generation Activities
- c) Geothermal areas and activities, electricity transmission and distribution
- ad) Large open spaces between built structures
- be) A mix of residential and rural industry buildings
- c) ~~Noises related to production activities during the day but low levels of noise at night~~
- d) ~~Low levels of light spill~~
- f) Effects from activities including noise, vibration, odour and visual effects
- e) ~~Infrequent vehicle movements to and from a site~~
- fg) Limited signage that directly relates to the activity operating on the site.

Include reason(s) for your submission point

Manawa is concerned that Policy 3b.2.9 may not lead to good environmental outcomes for the General Rural Environment. The character of the rural environment should also be defined by the activities which take place there. A policy that seeks to maintain the “established character” is essentially seeking no change.

The policy characterises the rural environment by matters such as “limited signage” whereas the existence of more than 20 large-scale renewable electricity generation activities is a far more significant and defining aspect of the General Rural Environment in the Taupō District.

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.2.10 Residential units **Points: 57.15**

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

Seek amendment

Amend as follows:

Avoid the cumulative effects of rural lifestyle development by providing for these activities within the Rural Lifestyle Environment and otherwise limiting residential units within the General Rural Environment that:

- a) Increase the demand for community infrastructure and services
- b) Result in the inefficient use of land or loss of future flexibility for productive uses
- c) Erode the general rural character through its density, scale and location-
- d) Result in the potential to generate reverse sensitivity effects.
- e) Constrain the ability to access or utilise renewable energy resources.

Include reason(s) for your submission point

Manawa supports Policy 3b.2.10 but it needs to be expanding to address one of the most significant adverse effects that

can arise as a result of residential units being established in the General Rural Environment, that being reverse sensitivity effects. The establishment of residential units should also not constrain the ability to access or utilise renewable energy resources (which are of national significance).

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: 57.16**

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

Seek amendment

Amend as follows:

Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and to ensure that the future availability of the rural land resource will not be compromised and to avoid the potential for reverse sensitivity effects.

Include reason(s) for your submission point

It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.

A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment.

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.2.15
Allotment size **Points: 57.17**

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

Support

Retain as notified

Include reason(s) for your submission point

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: 57.18**

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

Oppose

Delete Objective 3b.3.1 and replace it with the following:

Objective 3b.3.1 Enable Rural Residential Activities

Zone parts of the Rural Environment as Rural Lifestyle Environment to enable and provide for rural residential activities in

appropriate locations where they will not give rise to reverse sensitivity effects on the surrounding General Rural Environment or Industrial Environments.

Include reason(s) for your submission point

This is an unexpected objective for the parts of the Rural Environment where a greater density of subdivision and development is anticipated and provided for. The objective should focus on enabling rural residential opportunities in appropriate locations (i.e. where they will not create reverse sensitivity effects on activities in the wider General Rural Environment or Industrial Environments).

It is preferable that only appropriate locations are zoned Rural Lifestyle Environment whereby activities occurring within those zones do not need to be constrained by way of the rules and performance standards.

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: 57.19**

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

Seek amendment

Amend as follows:

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

Include reason(s) for your submission point

Manawa supports an objective in the Rural Lifestyle Environment chapter that seeks to avoid reverse sensitivity effects. However, Manawa is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already exists. This is particularly concerning for Manawa. The objective needs to also cover consented activities which have yet to be constructed / undertaken.

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: 57.20**

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

Seek amendment

Amend as follows:

Objective 3b.2.6 Impacts on ~~community~~ infrastructure

The impacts ~~on community infrastructure~~ arising from subdivision and development ~~are managed~~ do not compromise the safe and efficient functioning of infrastructure.

Include reason(s) for your submission point

The objective should apply to all infrastructure, not just community infrastructure.

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: 57.21**

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

Amend?

Seek amendment

Amend as follows:

...

i) An environment that is surrounded by a working rural environment including rural production, geothermal areas and renewable electricity generation activities.

Include reason(s) for your submission point

Manawa supports Policy 3b.3.9 but is also needs to recognise, and not have adverse effects on, the nature of the surrounding General Rural Environment.

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.3.10 Lot sizes and setbacks for allotments adjoining the General Rural Environment **Points: 57.22**

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

Amend?

Support

Retain as notified

Include reason(s) for your submission point

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.3.12 Minor residential unit **Points: 57.23**

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

Amend?

Seek amendment

Amend as follows:

Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, **and** to further protect the character of the ~~r~~Rural Lifestyle Environment ~~-and to avoid reverse sensitivity effects~~

Include reason(s) for your submission point

A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment.

It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity

effects on activities in the General Rural Environment.

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.1.1 Activities in the General Rural Environment

Points: 57.24

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

Support

Retain as notified

Include reason(s) for your submission point

Manawasupports Rule 4b.1.1 on the basis that it is consistent with the approach throughout the rest of the Plan, is effects based, and enables activities to occur that do not need to be the subject of a resource consent application process.

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: 57.25

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

Seek amendment

Amend as follows:

...

When considering activities under Rule 4b.1.2 Council restricts the exercise of its discretion to the following matters:

...

f. The ability to ~~mitigate~~ avoid adverse effects, including reverse sensitivity effects, through the use of screening, planting, landscaping, ~~and~~ alternative design, and/or other means including restrictive covenants.

g. Proposed methods for the avoidance, remedying or mitigation of potential adverse effects, and the degree to which they would be successful

h. The likelihood of future subdivision which results in the minor residential unit being on a separate allotment to the primary residential unit.

i. The potential to constrain access to and/or the utilisation of renewable energy sources.

Include reason(s) for your submission point

Minor residential units are sensitive activities whereby their establishment needs to be controlled so as to not result in reverse sensitivity effects.

An additional criterion has been added to ensure that minor residential units do not constrain access to and/or the utilisation of renewable energy sources.

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

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

Retain as notified

Include reason(s) for your submission point

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.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Steamfields

Points: 57.27

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

Amend as follows:

4b.1.4 Electricity Generation Core Sites, Renewable Electricity Energy Generation Activities and Geothermal Areas Steamfields

i. Any activity involving continued operation, maintenance and minor upgrading of existing electricity generation core sites, geothermal areas steamfield, renewable energy electricity generation activities and associated structures and ancillary activities is a **permitted activity**.

ii. Activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators are a permitted activity.

NOTE: For the purpose of this rule “maintenance” means:

All activities associated with the protective care, and monitoring of a hydro dam, a geothermal or hydroelectric power station, geothermal steamfields and associated structures, in order to monitor, test and/or arrest the processes of decay, structural fatigue, erosion or dilapidation of all associated structures and includes maintenance of surrounds and water areas.

NOTE: For the purpose of this rule “minor upgrading” means:

Structural improvement, repair and replacement or upgrade of components, or activities required for the continued safe and efficient operation including worn or technically deficient parts of any structure including the powerhouse, hydro dams, separation plants, switchyards, intake, control and diversion structures, wells, pipes, tunnels, cables, other equipment and accessory buildings and structures of similar character and scale, and includes associated drilling, vehicles, infrastructure, machinery, testing, monitoring, earthworks and vegetation removal. Also the extension to existing Buildings and Structures, and the erection of new Buildings and Structures up to 100m² in area and not exceeding the maximum height standard for the Rural Environment and the erection of any aerial, antennae or communication dish not exceeding 5m² in area located on top of a hydro or geothermal existing structure, subject to compliance with the Noise Performance Standard.

Manawa also seek the inclusion of their operations as Electricity Generation Core Sites at the following locations as depicted in Appendix A:

- Wheao and Flaxy
- Kuratau
- Hinemaia

Include reason(s) for your submission point

Manawa supports the retention of Rule 4b.1.4 (being a continuation of the Rule currently in the Rural Environment) with a number of minor amendments. This is the enabling rule that appropriately provides for the operation, maintenance and minor upgrading of renewable electricity generation activities in the General Rural Environment.

A second clause has been added to the rule on the basis that Policy G of NPS-REG states:

“Regional policy statements and regional and district plans shall include objectives, policies, and methods (including rules within plans) to provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators.”

Activities of this nature tend to be temporary activity and any effects are easily remediated.

Manawa also seeks the inclusion of their operations as Electricity Generation Core Sites at the following locations as depicted in Appendix A:

- Wheao and Flaxy
- Kuratau
- Hinemaia

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.1.7 High voltage transmission lines

Points: 57.28

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

Delete? Amend?

Seek amendment

Amend as follows:

4b.1.7 Buildings and Structures in proximity to High high voltage transmission lines

i. Any building or structure (except network utilities and Renewable Electricity Generation activities) located within 0 – 12 meters of a high voltage transmission line is a restricted discretionary activity.

Include reason(s) for your submission point

Manawa supports this rule as it seeks to ensure the safe operation of transmission lines. However, the heading of the rule needs to be more accurate. Renewable electricity generation activities are not necessarily network utilities and should also be exempt from this rule.

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.1.9 Earthworks within Outstanding Landscape Areas

Points: 57.29

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

Amend?

Seek amendment

Amend as follows:

EXCEPTION:

This rule will not apply to Earthworks associated with existing and consented renewable electricity generation activities including within Electricity Generation Core Sites

Manawa also seek the inclusion of their operations as Electricity Generation Core Sites at the following locations as depicted in Appendix 1:

- Wheao and Flaxy
- Hinenaia
- Kuratau

Include reason(s) for your submission point

Manawa supports this rule on the basis that it does not apply to earthworks within Electricity Generation Core Sites, but there is no reason why it should not apply to all other existing renewable electricity generation activities.

Manawa also seek the inclusion of their operations as Electricity Generation Core Sites at the following locations as depicted in Appendix 1:

- Wheao and Flaxy
- Hinenaia
- Kuratau

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: 57.30

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

Seek amendment

Amend as follows:

...

EXCEPTION:

This performance standard shall not apply to traffic movements involved in forest harvesting operations or existing and consented renewable electricity generation activities.

Include reason(s) for your submission point

Manawa supports Rule 4b.2.1 subject to the exception being expanded to include renewable electricity generation activities.

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: 57.31

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

Seek amendment

Amend as follows:

...

iv . 15 meters for ~~renewable E~~lectricity ~~G~~eneration ~~activities~~ on land identified as a Geothermal Area in Section O ~~within an Electricity Generation Core Site~~.

EXCEPTIONS:

- activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators including wind monitoring masts – no height limit

- Cranes being used as part of any construction or maintenance works for the duration of the works – no height limit.

- Drilling Rigs for up to 60 days per well ~~allotment~~ – no height limit.

Manawa also seek the inclusion of their operations as Electricity Generation Core Sites at the following locations as depicted in Appendix 1:

- Wheao and Flaxy
- Hinenaiia
- Kuratau

Include reason(s) for your submission point

An additional exception has been added to the rule on the basis that Policy G of NPS-REG states:

"Regional policy statements and regional and district plans shall include objectives, policies, and methods (including rules within plans) to provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators."

Activities if this nature tend to be temporary activity and any effects are easily remediated.

Manawa also seek the inclusion of their operations as Electricity Generation Core Sites at the following locations as depicted in Appendix 1:

- Wheao and Flaxy
- Hinenaiia
- Kuratau

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: 57.32**

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

Support

Retain as notified

Include reason(s) for your submission point

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.2.10 Maximum Noise - Construction Noise **Points: 57.33**

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

Amend?

Support

Retain as notified

Include reason(s) for your submission point

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.2.11 Maximum Noise - Electricity Generation Core Sites

Points: 57.34

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

Amend?

Support

Retain as notified

Include reason(s) for your submission point

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.2.12 Maximum Noise - Well Drilling and Testing

Points: 57.35

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

Amend?

Support

Retain as notified

Include reason(s) for your submission point

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.2.13 Maximum Noise - Other

Points: 57.36

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

Amend?

Seek amendment

Amend as follows:

...

ii. Nothing in the foregoing Performance Standards shall apply to sirens, circuit breakers, bursting discs, emergency or upset operating conditions and hydro spills associated with the operation of Renewable Electricity Generation Activities Core-sites. Provided that the activity shall comply with the requirements of S16 of the Resource Management Act 1991

Include reason(s) for your submission point

Manawa seeks minor amendments to ensure it applies to all applicable circumstances.

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.2.14 Parking, Loading and Access **Points: 57.37**

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

Delete Rule 4b.2.14

Include reason(s) for your submission point

Taupo District is a Tier 3 territorial authority. The NPS-UD sets out that tier 1, 2 and 3 territorial authorities must remove district plan rules, assessment criteria, policies and objectives that have the effect of setting minimum car parking rates as soon as practicable, no more than 18 months from the date of commencement of the NPS-UD.

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.2.15 Signage **Points: 57.38**

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

Retain as notified

Include reason(s) for your submission point

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.1 Subdivision - General Rural Environment **Points: 57.39**

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

Amend as follows:

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:

a) ...

i) Any effects on the functioning of the Rural Environment including adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources.

Include reason(s) for your submission point

Additional matter of control i) is applicable to 4b.5.1.i, 4b.5.2.i

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: 57.40**

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

Amend as follows:

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:

a) ...

i) Any effects on the functioning of the Rural Environment including adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources.

Include reason(s) for your submission point

Additional matter of control i) is applicable to 4b.5.1.i, 4b.5.2.i

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.2.13
Avoiding reverse sensitivity **Points: 57.41**

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

Seek amendment

Amend as follows:

Any adverse effects generated by a new sensitive activity must be managed within the allotment so as to avoid adversely affecting reverse sensitivity effects on permitted, and lawfully established and/or consented neighbouring activities.

Include reason(s) for your submission point

Manawa supports a policy in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects and seek an amendment to the policy for the same reasons set out in relation to the changes sought to Objective 3b.2.5.

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: 57.42**

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

Seek amendment

Amend as follows:

Limit the scale of commercial and industrial activity (excluding renewable electricity generation activities) to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary production and other activities provided for within the General Rural Environment.

Include reason(s) for your submission point

Because renewable electricity generation activities fall within the definition of industrial activities, they need to be excluded from the first part of the policy which seeks to limit commercial and industrial activities.

Manawa supports the intent of the policy but it needs to be widened to cover other activities (including renewable electricity generation activities) that are provided for and anticipated in the General Rural Environment beyond just primary production

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: 57.43

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

Seek amendment

Amend as follows:

...

ii. A commercial, industrial activity or home business which does not comply with the performance standards is a **restricted discretionary activity**.

When considering activities under Rule 4b.1.5ii Council restricts the exercise of its discretion to the following matters:

- a. The daily vehicle movements expected to and from the allotment.
- b. The effect of the activity on the rural character of the area, having regard to visual effects and lighting effects.
- c. The effect of the activity on surrounding land uses (including reverse sensitivity effects) and how these effects can be managed onsite and/or mitigated.

...

Include reason(s) for your submission point

Home businesses could include sensitive activities and therefore there is the need to avoid creating reverse sensitivity effects.

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.1.8 Buildings within Outstanding Landscape Areas

Points: 57.44

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

Seek amendment

Amend as follows:

...

EXCEPTION: This rule will not apply to the erection of structures:

a. Associated with existing renewable electricity generation activities including ~~W~~within Electricity Generation Core Sites.

...

Manawa also seek the inclusion of their operations as Electricity Generation Core Sites at the following locations as depicted in Appendix A:

- Wheao and Flaxy
- Kuratau
- Hinemaia

Include reason(s) for your submission point

Manawa supports this rule on the basis that it does not apply to buildings within Electricity Generation Core Sites, but there is no reason why it should not apply to all other existing renewable electricity generation activities.

Manawa also seek the inclusion of their operations as Electricity Generation Core Sites at the following locations as depicted in Appendix A:

- Wheao and Flaxy
- Kuratau
- Hinemaia

Attached Documents

File
Taupo DC Plan Changes Chapter 38 and 42 Entered Review 221209
Appendix A- Electricity Generation core sites

Consultation Document Submissions

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.3 Strategic Direction 3 Urban Form and Development > 2.3.3 Policy

Seek amendment

Relief sought

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

Amend to read as follows:

2.3.3 Policies

...

5. Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure (including development ~~and of~~ additional infrastructure), according to the capacity limitations of that infrastructure.

...

7. Provide for the development of Papakāinga on ~~m~~Māori land to facilitate ~~m~~Māori occupation on their ancestral lands.

...

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 district's pre-eminent retail, commercial and mixed-use centres.

10. Manage subdivision use and development of land to ensure that it will not:

- a. have an adverse effect on the functioning of the environment where it is located,
- b. unduly conflict with existing activities on adjoining properties ~~and the surrounding areas~~,
- c. compromise development consistent with the intent and planned urban built form of the environment where it is located
- d. give rise to reverse sensitivity effects ~~from existing uses~~.

...

Reasons

Include reason(s) for your submission point:

There are a number of typos that need to be corrected and other edits.

Conflicts need to be avoided with activities in the wider surrounding environment, not just on adjoining properties.

Reverse sensitivity effects do not arise from "existing uses". They arise from new or expanded sensitive activities locating in proximity to existing uses.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.4 Strategic Direction 4 Climate Change > 2.4.2 Objective

Seek amendment

Relief sought

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

2.4.2 Objectives

...

~~2.~~ **An increase in the amount of electricity generated from renewable sources within the Taupō District to assist with the decarbonisation of the economy.**

~~3.~~ Subdivision, use and development of land in the Taupō District will be resilient to the current and future effects of climate change on the District's current and future communities, including any disproportionate effects on ~~m~~Māori.

~~34.~~ The Taupō District is well prepared to adapt to the risks and effects from climate change, such as natural hazards.

Reasons

Include reason(s) for your submission point:

A new objective needs to clearly articulate the desirability of increased renewable electricity generation to assist with the decarbonisation of the economy (both within the Taupō District and nationally).

Typos / Grammar

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.4 Strategic Direction 4 Climate Change > 2.4.3 Policy

Seek amendment

Relief sought

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

2.4.3 Policies

1. Land use activities which will result in positive climate change outcomes, including through reducing greenhouse gas emissions and decarbonisation, will be supported and ~~encouraged~~ enabled.

2. Recognise and provide for the use and development of the District's renewable energy resources to facilitate decarbonization of the economy, including a reduction in greenhouse gas emissions, increased electricity generation capacity and improved security of supply including transmission.

3. Enable the upgrading and maintenance of existing and development of new renewable electricity generation activities and transmission, including where contributing to one of the following:

- adaptation required to mitigate risks from climate change
- provides for increased electricity output, or greater efficiency

continued safe, efficient and secure operation

~~24.~~ Land use activities which will ~~unduly~~ accelerate the effects of climate change will be discouraged.

~~35.~~ 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.

46. Subdivision, use and development of land must demonstrate resilience to the effects of climate change over time.

Reasons

Include reason(s) for your submission point:

The New Zealand Energy Strategy 2011 has set a target that 90 percent of electricity generation will be from renewable sources by 2025. Using more renewable resources to meet energy demand will reduce dependence on fossil fuels which are a finite resource and reduce carbon dioxide emissions, which contribute to global warming and climate change effects. These approaches are also consistent with the National Policy Statement on Renewable Electricity Generation, 2011.

Typos / Grammar

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.5 Strategic Direction 5 Significant and Local Infrastructure > 2.5.2 Objectives

Seek amendment

Relief sought

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

Amend 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 and protected in decision making and land use planning.

2. The local and national benefits of the sustainable development, operation, maintenance and upgrading of electricity transmission and renewable electricity generation resources and activities are recognised and ~~encouraged~~ achieved.

...

Reasons

Include reason(s) for your submission point:

The National Planning Statement Renewable Electricity Generation in Policy A states that Decision-makers shall recognise and provide for the national significance of renewable electricity generation activities, including the national, regional and local benefits relevant to renewable electricity generation activities. Manawa Energy is seeking for more than recognise and encourage and that Renewable Electricity Generation is provided for in District Planning.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.5 Strategic Direction 5 Significant and Local Infrastructure > 2.5.3 Policy

Seek amendment

Relief sought

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

Amend as follows:

2.5.3 Policies

1. Recognise and provide for the national, regional and local benefits of renewable ~~energy~~ electricity generation activities and resources, and transmission activities, in relation to climate change, security of supply, and social, and economic wellbeing of people and communities and for their health and safety.

...

Reasons

Include reason(s) for your submission point:

The introduction should more accurately refer to “electricity generation”, not “energy generation”. One of the laws of physics is that energy cannot be generated. It can only be transformed from one form to another. The NPS Renewable Energy has been in effect since 2011 and with current renewable electricity goals from the government it is no longer enough to simply recognise the role renewable energy but as per the NPS: REG Policy A that Councils should provide for renewable electricity generations.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.6 Strategic Direction 6 Natural Environment Values > 2.6.3 Policy

Seek amendment

Relief sought

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

Amend as follows:

2.6.3 Policy [iesy](#)

...

[7. Recognise the benefits of offset measures and compensation and provide for their use as feasible alternatives to manage significant residual adverse effects of renewable electricity generation activities and regionally significant infrastructure..](#)

Reasons

Include reason(s) for your submission point:

Manawa seek the inclusion of an additional policy that covers an increasingly important aspect of consenting renewable electricity generation activities.

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

Oppose

Relief sought

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

Amend as follows:

Rural Industry – 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](#).

Insert a new definition of Renewable Electricity Generation as follows (being the same definition in the NPS-REG):

[Renewable electricity generation means generation of electricity from solar, wind, hydro-electricity, geothermal, biomass, tidal, wave, or ocean current energy sources.](#)

Insert a new definition for Renewable electricity generation activities (being the same definition in the NPS-REG) as follows:

[Renewable electricity generation activities means the construction, operation and maintenance of structures associated with renewable electricity generation. This includes small and community-scale distributed renewable generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.](#)

Insert a new definition for reverse sensitivity (being the definition in the Waikato RPS) as follows:

[Reverse sensitivity is the vulnerability of a lawfully established activity to a new activity or land use. It arises when a lawfully established activity causes potential, actual or perceived adverse environmental effects on the new activity, to a point where the new activity may seek to restrict the operation or require mitigation of the effects of the established activity.](#)

Reasons

Include reason(s) for your submission point:

Manawa opposes the view that Renewable Electricity Generation are recognised as ‘Rural Industry’. The 20 power generation facilities within the existing rural environmental in the Taupo District are located there, as there is a functional need to be located where energy resources exist. They are not simply a ‘Rural Industry’ because they are located in a ‘Rural Environment’. They are ‘Renewable Electricity Generation’ activities located in the Rural Environment.

Renewable electricity generation is an activity that has been recognised in the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG) as a matter of national significance. Renewable electricity generation is also an activity identified in the Waikato and BoP RPS as a Regionally Significant Infrastructure. It is therefore inappropriate to treat that activity as part of, and in the same manner as, other activities that occur in the rural environment such as forestry, agriculture and dairy farming. The elevated status and importance of renewable electricity generation should be recognised in the Taupō District Plan with its own set of objectives, policies and methods.

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.2.1 Enable Primary Production

Seek amendment

Relief sought

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

Amend as follows:

Objective 3b.2.1 Enable Primary Production and the Use of Natural Resources

Primary production and the use of natural resources are enabled by protecting the availability of the rural land and other resources and its their productive capability. **Reasons**
Include reason(s) for your submission point:

Manawa supports Objective 3b.2.1 with an amendment so that it covers a wider range of uses anticipated in the General Rural Environment beyond just "primary production".

In accordance with s75(3) of the RMA District objectives and policies must give effect to existing RPS objectives and policies. Objective IM-02 in the Waikato RPS is 'Resource Use and Development'. One of the policies which achieves objective IM-02 is IM-P4 'Regionally Significant industry and primary production'. Our suggested amendments give effect to the Waikato RPS.

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.2.2 Maintaining the established General Rural character

Seek amendment

Relief sought

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

Amend as follows:

Objective 3b.2.2 ~~Maintaining the established General~~ Rural character

The established character of the General Rural Environment is maintained and the cumulative erosion of its character through incremental subdivision and development is avoided. Enable a range of activities in the General Rural Environment that are compatible with rural character.

Reasons

Include reason(s) for your submission point:

The established character of the General Rural Environment may not represent a good environmental outcome to the extent that it should be "maintained". An objective that seeks to maintain the "established character" is essentially seeking no change. The objective seeks to avoid "incremental subdivision and development" which essentially locks in the status quo and will make it difficult for any new development to occur, including new development that has been identified in other planning provision as being appropriately located in the General Rural Environment.

The wording of some of the existing planning provisions in the Rural Environment have been proposed as alternative wording for Objective 3b.2.2.

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

Seek amendment

Relief sought

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

Insert new objective as follows:

Objective 3b.2.X Renewable Electricity Generation and Transmission Activities

Enable the development, operation, maintenance and upgrading of renewable electricity generation activities and transmission activities in the General Rural Environment.

Reasons

Include reason(s) for your submission point:

Due to its elevated status under the NPS-REG, Manawa has sought (above) that the definition of Rural Industry be amended to delete any reference to electricity generation and that a new definition of Renewable Electricity Generation and Renewable Electricity Generation Activities be including in the Plan. In line with that outcome, a new objective needs to be included in the Plan seeking to enable renewable electricity generation activities (and transmission activities by association).

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

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

Amend as follows:

Māori cultural activities, tourism activities, **and** visitor accommodation **and renewable electricity generation and transmission** activities are enabled in **appropriate locations within** the General Rural Environment.

Reasons**Include reason(s) for your submission point:**

As a consequential change to the relief sought above (inserting a new objective in relation to renewable electricity generation activities), Objective 3b.2.4 needs to be amended to remove the reference to renewable electricity generation (and transmission by association).

Visitor accommodation is a sensitive activity and should only be enabled in appropriate locations within the General Rural Environment rather than enabled anywhere including in locations whereby reverse sensitivities could arise.

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.2.5 Avoidance of reverse sensitivity

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

Amend as follows:

Reverse sensitivity effects on permitted, **and** legally established, **and/or consented** activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided.

Reasons**Include reason(s) for your submission point:**

The scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already exists. The objective needs to also cover consented activities which have yet to be constructed / undertaken.

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

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

Amend as follows:

The impacts **on infrastructure** arising from subdivision and development **are managed do not compromise the safe and efficient functioning of infrastructure.**

Reasons**Include reason(s) for your submission point:**

An objective (or policy) that only seeks to “manage” something (with no specified outcome) does not provide useful guidance to resource management decision makers or other users of the Taupō District Plan.

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

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

Amend as follows:

Policy 3b.2.9 **Maintaining the established Rural** character

Enable activities in the **Maintain the established** General Rural Environment **that will not compromise the character of the General Rural Environment**, as defined by:

- a) **Extensive pastoral farming and forestry**
- b) **Structures associated with Renewable Electricity generation Activities**
- c) **Geothermal areas and activities, electricity transmission and distribution**
- a**d**) Large open spaces between built structures
- b**e**) A mix of residential and rural industry buildings
- e) **Noises related to production activities during the day but low levels of noise at night**
- d) **Low levels of light spill**
- f) **Effects from activities including noise, vibration, odour and visual effects**

Reasons
Include
reason(s)
for your

fg) Limited signage that directly relates to the activity operating on the site.

submission point:

Manawa is concerned that Policy 3b.2.9 may not lead to good environmental outcomes for the General Rural Environment. The character of the rural environment should also be defined by the activities which take place there. A policy that seeks to maintain the “established character” is essentially seeking no change.

The policy characterises the rural environment by matters such as “limited signage” whereas the existence of more than 20 large-scale renewable electricity generation activities is a far more significant and defining aspect of the General Rural Environment in the Taupō District.

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.2.10 Residential units

Seek amendment

Relief sought

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

Amend as follows:

Avoid the cumulative effects of rural lifestyle development by providing for these activities within the Rural Lifestyle Environment and otherwise limiting residential units within the General Rural Environment that:

- a) Increase the demand for community infrastructure and services
- b) Result in the inefficient use of land or loss of future flexibility for productive uses
- c) Erode the general rural character through its density, scale and location:

d) Result in the potential to generate reverse sensitivity effects.

e) Constrain the ability to access or utilise renewable energy resources.

Reasons

Include reason(s) for your submission point:

Manawa supports Policy 3b.2.10 but it needs to be expanding to address one of the most significant adverse effects that can arise as a result of residential units being established in the General Rural Environment, that being reverse sensitivity effects. The establishment of residential units should also not constrain the ability to access or utilise renewable energy resources (which are of national significance).

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

Seek amendment

Relief sought

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

Amend as follows:

Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and to ensure that the future availability of the rural land resource will not be compromised and to avoid the potential for reverse sensitivity effects.

Reasons

Include reason(s) for your submission point:

It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.

A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment.

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.2.15 Allotment size

Support

Relief sought

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

Retain as notified

Reasons

Include reason(s) for your submission point:

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

Oppose

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

Delete Objective 3b.3.1 and replace it with the following:

Objective 3b.3.1 Enable Rural Residential ActivitiesZone parts of the Rural Environment as Rural Lifestyle Environment to enable and provide for rural residential activities in appropriate locations where they will not give rise to reverse sensitivity effects on the surrounding General Rural Environment or Industrial Environments.**Reasons****Include reason(s) for your submission point:**

This is an unexpected objective for the parts of the Rural Environment where a greater density of subdivision and development is anticipated and provided for. The objective should focus on enabling rural residential opportunities in appropriate locations (i.e. where they will not create reverse sensitivity effects on activities in the wider General Rural Environment or Industrial Environments).

It is preferable that only appropriate locations are zoned Rural Lifestyle Environment whereby activities occurring within those zones do not need to be constrained by way of the rules and performance standards.

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

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

Amend as follows:

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

Reasons**Include reason(s) for your submission point:**

Manawa supports an objective in the Rural Lifestyle Environment chapter that seeks to avoid reverse sensitivity effects. However, Manawa is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already exists. This is particularly concerning for Manawa. The objective needs to also cover consented activities which have yet to be constructed / undertaken.

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

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

Amend as follows:

Objective 3b.2.6 Impacts on ~~community~~ infrastructure

The impacts ~~on community infrastructure~~ arising from subdivision and development ~~are managed~~ do not compromise the safe and efficient functioning of infrastructure.

Reasons**Include reason(s) for your submission point:**

The objective should apply to all infrastructure, not just community infrastructure.

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

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

Amend as follows:

...

i) An environment that is surrounded by a working rural environment including rural production, geothermal areas and renewable electricity generation activities.

Reasons**Include reason(s) for your submission point:**

Manawa supports Policy 3b.3.9 but is also needs to recognise, and not have adverse effects on, the nature of the surrounding General Rural Environment.

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.3.10 Lot sizes and setbacks for allotments adjoining the General Rural Environment

Support

Relief sought

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

Retain as notified

Reasons

Include reason(s) for your submission point:

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.3.12 Minor residential unit

Seek amendment

Relief sought

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

Amend as follows:

Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, ~~and~~ to further protect the character of the ~~Rural Lifestyle Environment-~~and to avoid reverse sensitivity effects

Reasons

Include reason(s) for your submission point:

A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment.

It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.

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.1.1 Activities in the General Rural Environment

Support

Relief sought

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

Retain as notified

Reasons

Include reason(s) for your submission point:

Manawasupports Rule 4b.1.1 on the basis that it is consistent with the approach throughout the rest of the Plan, is effects based, and enables activities to occur that do not need to be the subject of a resource consent application process.

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

Seek amendment

Relief sought

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

Amend as follows:

...

When considering activities under Rule 4b.1.2 Council restricts the exercise of its discretion to the following matters:

...

f. The ability to ~~mitigate avoid~~ adverse effects, including reverse sensitivity effects, through the use of screening, planting, landscaping, ~~and~~ alternative design, and/or other means including restrictive covenants.

g. Proposed methods for the avoidance, remedying or mitigation of potential adverse effects, and the degree to which they would be successful

h. The likelihood of future subdivision which results in the minor residential unit being on a separate allotment to the primary residential unit.

i. The potential to constrain access to and/or the utilisation of renewable energy sources.

Reasons

Include reason(s) for your submission point:

Minor residential units are sensitive activities whereby their establishment needs to be controlled so as to not result in reverse sensitivity effects.

An additional criterion has been added to ensure that minor residential units do not constrain access to and/or the utilisation of renewable energy sources.

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

Oppose**Relief sought**

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

Retain as notified

Reasons

Include reason(s) for your submission point:

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.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Steamfields

Seek amendment**Relief sought**

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

Amend as follows:

4b.1.4 Electricity Generation Core Sites, Renewable ~~Electricity Energy~~ Generation Activities and Geothermal ~~Areas Steamfields~~

i. Any activity involving continued operation, maintenance and minor upgrading of existing electricity generation core sites, geothermal ~~areas steamfield~~, renewable ~~energy electricity~~ generation activities and associated structures ~~and ancillary activities~~ is a **permitted activity**.

ii. Activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators are a permitted activity.

NOTE: For the purpose of this rule "maintenance" means:

All activities associated with the protective care, ~~and monitoring of a hydro dam, a geothermal or hydroelectric power station, geothermal steamfields and associated structures, in order to monitor~~, test and/or arrest the processes of decay, structural fatigue, erosion or dilapidation ~~of all associated structures~~ and includes maintenance of surrounds and water areas.

NOTE: For the purpose of this rule "minor upgrading" means:

Structural improvement, repair and replacement or upgrade of components, or activities required for the continued safe and efficient operation including worn or technically deficient parts of any structure including the powerhouse, hydro dams, separation plants, switchyards, intake, control and diversion structures, wells, pipes, tunnels, cables, other equipment and accessory buildings and structures of similar character and scale, and includes associated drilling, vehicles, infrastructure, machinery, testing, monitoring, earthworks and vegetation removal. Also the extension to existing Buildings and Structures, and the erection of new Buildings and Structures up to 100m² in area and not exceeding the maximum height standard for the Rural Environment and the erection of any aerial, antennae or communication dish not exceeding 5m² in area located on top of a hydro or geothermal existing structure, subject to compliance with the Noise Performance Standard.

Manawa also seek the inclusion of their operations as Electricity Generation Core Sites at the following locations as depicted in Appendix A:

- Wheao and Flaxy
- Kuratau
- Hinemaia

Reasons

Include reason(s) for your submission point:

Manawa supports the retention of Rule 4b.1.4 (being a continuation of the Rule currently in the Rural Environment) with a number of minor amendments. This is the enabling rule that appropriately provides for the operation, maintenance and minor upgrading of renewable electricity generation activities in the General Rural Environment.

A second clause has been added to the rule on the basis that Policy G of NPS-REG states:

"Regional policy statements and regional and district plans shall include objectives, policies, and methods (including rules within plans) to provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators."

Activities if this nature tend to be temporary activity and any effects are easily remediated.

Manawa also seek the inclusion of their operations as Electricity Generation Core Sites at the following locations as depicted in Appendix A:

- Wheao and Flaxy
- Kuratau
- Hinemaia

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.1.7 High voltage transmission lines

Seek amendment

Relief sought

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

Amend as follows:

4b.1.7 Buildings and Structures in proximity to High voltage transmission lines

i. Any building or structure (except network utilities and Renewable Electricity Generation activities) located within 0 – 12 meters of a high voltage transmission line is a restricted discretionary activity.

Reasons

Include reason(s) for your submission point:

Manawa supports this rule as it seeks to ensure the safe operation of transmission lines. However, the heading of the rule needs to be more accurate.

Renewable electricity generation activities are not necessarily network utilities and should also be exempt from this rule.

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.1.9 Earthworks within Outstanding Landscape Areas

Seek amendment

Relief sought

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

Amend as follows:

EXCEPTION:

This rule will not apply to Earthworks associated with existing and consented renewable electricity generation activities including within Electricity Generation Core Sites

Manawa also seek the inclusion of their operations as Electricity Generation Core Sites at the following locations as depicted in Appendix 1:

- Wheao and Flaxy
- Hinenaia
- Kuratau

Reasons

Include reason(s) for your submission point:

Manawa supports this rule on the basis that it does not apply to earthworks within Electricity Generation Core Sites, but there is no reason why it should not apply to all other existing renewable electricity generation activities.

Manawa also seek the inclusion of their operations as Electricity Generation Core Sites at the following locations as depicted in Appendix 1:

- Wheao and Flaxy
- Hinenaia
- Kuratau

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

Seek amendment

Relief sought

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

Amend as follows:

...

EXCEPTION:

This performance standard shall not apply to traffic movements involved in forest harvesting operations or existing and consented renewable electricity generation activities.

Reasons

Include reason(s) for your submission point:

Manawa supports Rule 4b.2.1 subject to the exception being expanded to include renewable electricity generation activities.

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

Seek amendment

Relief sought

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

Amend as follows:

...

iv . 15 meters for renewable Electricity Generation activities on land identified as a Geothermal Area in Section O within an Electricity Generation Core Site.

EXCEPTIONS:

- activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators including wind monitoring masts – no height limit

- Cranes being used as part of any construction or maintenance works for the duration of the works – no height limit.

- Drilling Rigs for up to 60 days per well ~~at~~ lotment – no height limit.

Manawa also seek the inclusion of their operations as Electricity Generation Core Sites at the following locations as depicted in Appendix 1:

- Wheao and Flaxy
- Hinenaia
- Kuratau

Reasons

Include reason(s) for your submission point:

An additional exception has been added to the rule on the basis that Policy G of NPS-REG states:

“Regional policy statements and regional and district plans shall include objectives, policies, and methods (including rules within plans) to provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators.”

Activities if this nature tend to be temporary activity and any effects are easily remediated.

Manawa also seek the inclusion of their operations as Electricity Generation Core Sites at the following locations as depicted in Appendix 1:

- Wheao and Flaxy
- Hinenaia
- Kuratau

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

Support

Relief sought

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

Retain as notified

Reasons

Include reason(s) for your submission point:

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.2.10 Maximum Noise - Construction Noise

Support

Relief sought

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

Retain as notified

Reasons

Include reason(s) for your submission point:

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.2.11 Maximum Noise - Electricity Generation Core Sites

Support

Relief sought

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

Retain as notified

Reasons

Include reason(s) for your submission point:

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.2.12 Maximum Noise - Well Drilling and Testing

Support

Relief sought

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

Retain as notified

Reasons

Include reason(s) for your submission point:

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.2.13 Maximum Noise - Other

Seek amendment

Relief sought

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

Amend as follows:

...

ii. Nothing in the foregoing Performance Standards shall apply to sirens, circuit breakers, [bursting discs](#), [emergency or upset operating conditions](#) and hydro spills associated with the operation of [Renewable](#) Electricity Generation [Activities Core sites](#). Provided that the activity shall comply with the requirements of S16 of the Resource Management Act 1991

Reasons

Include reason(s) for your submission point:

Manawa seeks minor amendments to ensure it applies to all applicable circumstances.

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.2.14 Parking, Loading and Access

Oppose

Relief sought

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

Delete Rule 4b.2.14

Reasons

Include reason(s) for your submission point:

Taupo District is a Tier 3 territorial authority. The NPS-UD sets out that tier 1, 2 and 3 territorial authorities must remove district plan rules,

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.2.15 Signage

Support

Relief sought

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

Retain as notified

Reasons

Include reason(s) for your submission point:

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.1 Subdivision - General Rural Environment

Seek amendment

Relief sought

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

Amend as follows:

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:

a) ...

[i\) Any effects on the functioning of the Rural Environment including adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources.](#)

Reasons

Include reason(s) for your submission point:

Additional matter of control i) is applicable to 4b.5.1.i, 4b.5.2.i

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

Seek amendment

Relief sought

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

Amend as follows:

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:

a) ...

[i\) Any effects on the functioning of the Rural Environment including adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources.](#)

Reasons

Include reason(s) for your submission point:

Additional matter of control i) is applicable to 4b.5.1.i, 4b.5.2.i

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.2.13 Avoiding reverse sensitivity

Seek amendment

Relief sought

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

Amend as follows:

Any adverse effects generated by an new sensitive activity must be managed within the allotment so as to avoid adversely affecting reverse sensitivity effects on permitted, and lawfully established and/or consented neighbouring activities.

Reasons

Include reason(s) for your submission point:

Manawa supports a policy in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects and seek an amendment to the policy for the same reasons set out in relation to the changes sought to Objective 3b.2.5.

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

Seek amendment

Relief sought

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

Amend as follows:

Limit the scale of commercial and industrial activity ([excluding renewable electricity generation activities](#)) to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary production [and other](#) activities [provided for](#) within the General Rural Environment.

Reasons

Include reason(s) for your submission point:

Because renewable electricity generation activities fall within the definition of industrial activities, they need to be excluded from the first part of the policy which seeks to limit commercial and industrial activities.

Manawa supports the intent of the policy but it needs to be widened to cover other activities (including renewable electricity generation activities) that are provided for and anticipated in the General Rural Environment beyond just primary production

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,

Seek amendment

Relief sought

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

Amend as follows:

...

ii. A commercial, industrial activity or home business which does not comply with the performance standards is a **restricted discretionary activity**.

When considering activities under Rule 4b.1.5*ii* Council restricts the exercise of its discretion to the following matters:

- a. The daily vehicle movements expected to and from the allotment.
- b. The effect of the activity on the rural character of the area, having regard to visual effects and lighting effects.
- c. The effect of the activity on surrounding land uses ([including reverse sensitivity effects](#)) and how these effects can be managed onsite and/or mitigated.

...

sensitivity effects.

Reasons

Include reason(s) for your submission point:

Home businesses could include sensitive activities and therefore there is the need to avoid creating reverse

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.1.8 Buildings within Outstanding Landscape Areas

Seek amendment

Relief sought

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

Amend as follows:

...

EXCEPTION: This rule will not apply to the erection of structures:

[a. Associated with existing renewable electricity generation activities including W](#)within Electricity Generation Core Sites.

...

Manawa also seek the inclusion of their operations as Electricity Generation Core Sites at the following locations as depicted in Appendix A:

- Wheao and Flaxy
- Kuratau
- Hinemaia

Reasons

Include reason(s) for your submission point:

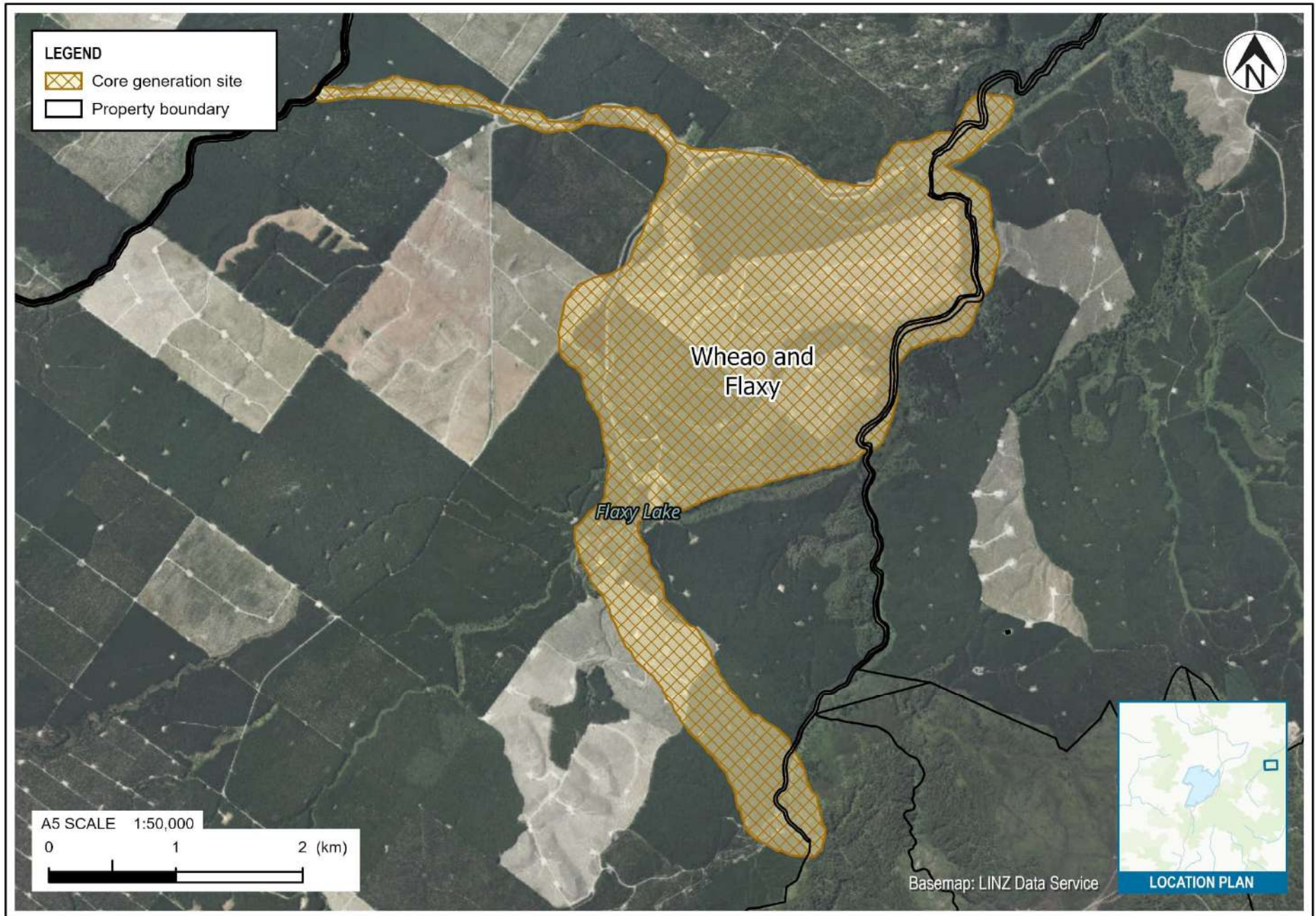
Manawa supports this rule on the basis that it does not apply to buildings within Electricity Generation Core Sites, but there is no reason why it should not apply to all other existing renewable electricity generation activities.

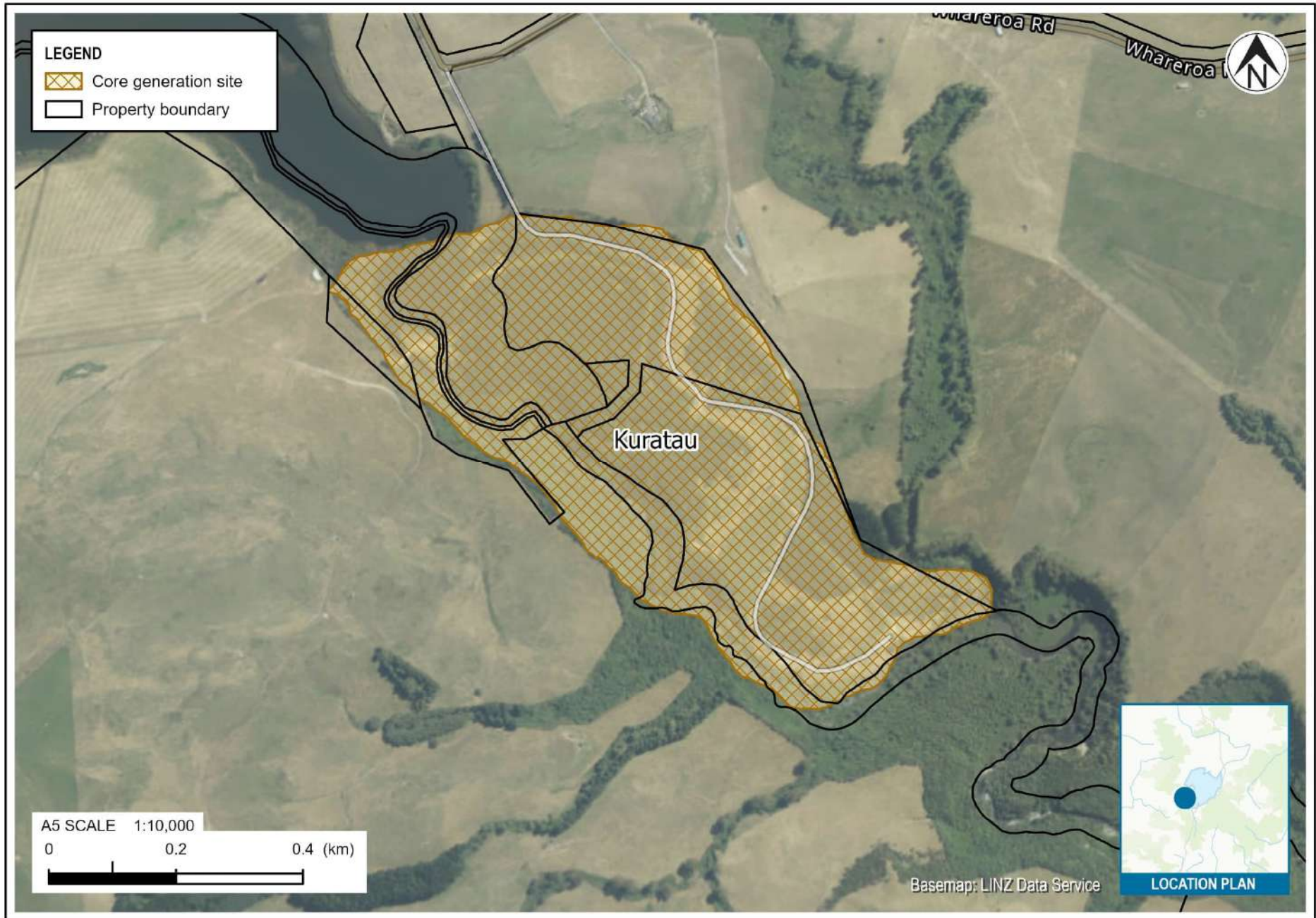
Manawa also seek the inclusion of their operations as Electricity Generation Core

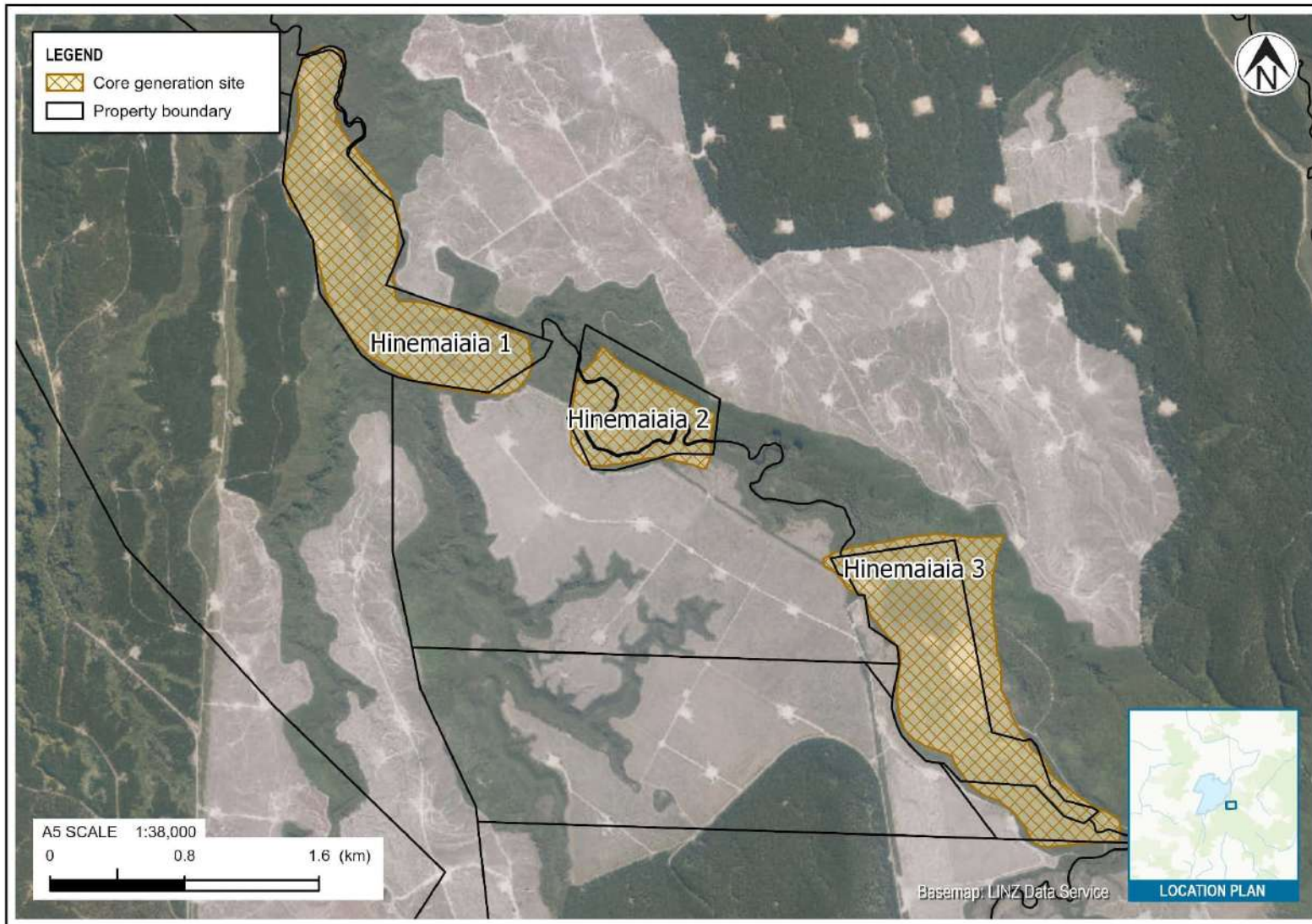
Sites at the following locations as depicted in Appendix A:

- Wheao and Flaxy
- Kuratau
- Hinemaia

Appendix A: Electricity Generation Core Sites









First name: Joan

Last name: Forret

On behalf of:
Pukawa D2 Trust

Postal address:
Suburb:
City:
Country: New Zealand

Email: joan.forret@harkness.co.nz

Daytime Phone: 078344662

- 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
Submission Pukawa D2 Trust

Pukawa D2 Trust

Form 5

Submission on notified proposal for policy statement or plan, change or variation

[Clause 6](#) of Schedule 1, Resource Management Act 1991

Taupō District Plan

Name of submitter: Gary Te Hiraka Konui, and Tutewheriko Raymond Leevey as trustees of the Pukawa D2 Trust.

This is a submission on Proposed Plan 38.

We could not gain an advantage in trade competition through this submission.

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

See attached **Schedule 1**.

We wish to be heard in support of our submission.

If others make a similar submission, we will consider presenting a joint case with them at a hearing.



Signature of submitter
(or person authorised to sign
on behalf of submitter)

Date: 09/12/2022

Electronic address for service of submitter: joan.forret@harkness.co.nz;
charlotte.muggeridge@harkness.co.nz

Telephone: 07 834 4662

Postal address Private Bag 3077, Hamilton, 3240

Contact person: Joan Forret

Pukawa D2 Trust

Schedule 1

This submission is on behalf of:

Gary Te Hiraka Konui, and Tutewheriko Raymond Leevey as trustees of the Pukawa D2 Trust (“the Trust”) on the property reference 111295 held as Māori General Land and on the property reference WN38B/25 held as General Land.

Submission:

The land now held by the Pukawa D2 and D3 trusts represents the last remnants of the lands at Kuratau and Omori that were traditionally used by the tangata whenua as their gardens, dating from ancient times right up to the commencement of the Second World War. Their homes were situated around Lake Rotoaira and further up the mountain for defensive purposes. That land was not suitable for gardens, so the people would spend the spring and summer on the warmer, more fertile land close to the Lake to grow food to keep them through the rest of the year. The land was historically zoned residential.

The Trust agrees that the Significant Resource Management Issues section of the District Plan should be replaced with the new Strategic Directions section. The Trust is in general support of the directions but seeks further clarity on the status of the directions to the district plan.

The Tāngata Whenua clauses are sought to be strengthened, making the clauses more aligned with the Natural and Built Environments Bill (that the principles of te Tiriri o Waitangi will be given effect to) and that iwi management plans are recorded as being higher level documents than the district plan.

Changes to the Natural Environment Values clauses are sought to allow for environmental offsetting when appropriate (and to be consistent with the Natural Values chapter of the District Plan which enables activities which result in a Net Environmental Gain. Offsetting is considered an appropriate tool and should be an option able to be contemplated and reflected in the objectives and policies in the Strategic Directions chapter. Offsetting should be allowed after steps to avoid, remedy, and mitigate adverse effects have been considered, particularly where offsetting may give rise to a net environmental gain.

Details of the submission are on the following page.

Pukawa D2 Trust

Plan Section	Support/oppose	Relief sought	Reasons
<p>Chapter 2 Strategic Directions</p> <p>Overview</p>	<p>Support in part</p>	<p>The following chapter provides an outline of the key strategic and significant resource management matters for the Taupō district. This chapter includes objectives and policies to guide decision making at a strategic level.</p> <p>The order of the Strategic Directions reflects the status and importance of each Direction and its objectives and policies.</p> <p>The strategic objectives set the direction for the District Plan and help to implement the Council’s community outcomes for resource management practices. They are indicative of the matters which are important to the Taupō District community and Council and reflect the intended outcomes to be achieved through the implementation of the District Plan.</p> <p>The strategic directions will be particularly relevant for any future changes to the Plan and any significant resource consent applications where there is a requirement to consider District Plan policy. The strategic directions must</p>	<p>Clear understanding of the legal status of the directions is required to assist planners when making assessments against the district plan.</p> <p>To assist with the importance and status of each direction, a hierarchy should be established.</p> <p>Establishing a hierarchy for the directions is needed to ensure Tangata Whenua – Direction 1 is regarded on all decision making processes to take into account the Principles of te Tiriti o Waitangi. That outcome is anticipated in clause 4 of the Natural and Built Environment Bill.</p>

Pukawa D2 Trust

		<p>be considered in all resource consent applications and plan changes.–This chapter should be read as a whole and applied across the district and all zonings unless the provisions relate to a specific zoning or part of the District.</p> <p>This chapter does not include rules. Relevant rules can instead be found in the chapters under the District Wide and Area Specific headings of the Plan.</p>	<p>It is not clear why particular zoning would not be subject to overarching strategic directions.</p>
<p>Chapter 2 Strategic Directions Tāngata Whenua</p> <p>Objective 2.1.2.1</p>	<p>Support in part</p>	<p>The values, rights and interests of Taupō District mana whenua are listened to, recognised and protected. (moved to be objective 4)</p>	<p>A lot of planning processes are about listening to mana whenua.</p>
<p>Chapter 2 Strategic Directions Tāngata Whenua</p> <p>Objectives 2.1.2.2, 3, 4, and 5</p>	<p>Support</p>	<p>2. Mana whenua are a partner in District Plan planning and decision making. (moved to be objective 5)</p> <p>3. Resource management planning and decision making reflects tikanga, mana whakahaere, Kaitiakitanga, manaakitanga, whakapapa, mautaranga māori and te whanake (moved to be objective 6).</p>	<p>Mana whenua are a partnership and this relationship should be acknowledged.</p> <p>A hierarchy of these directions should be followed, outlined in green is the order in which these should be.</p>

Pukawa D2 Trust

		<p>4. Support development on Māori land that meet the needs of those landowners and respects the exercise of kaitiakitanga, self-determination and the relationship of tāngata whenua with their land, water, significant sites and Wāhi tapu. (moved to be objective 3)</p> <p>5. Māori are supported to develop their ancestral lands for their social, economic and cultural wellbeing. (moved to be objective 2)</p>	
<p>Chapter 2 Strategic Directions Tāngata Whenua</p> <p>Objective 2.1.3.6</p>	Support in part	<p>The principles of te tiriti o Waitangi are must be taken into account through District Plan planning and decision making.</p> <p>(moved to be objective 1)</p>	Clause 4 Natural and Built Environment Bill.
<p>Chapter 2 Strategic Directions Tāngata Whenua</p> <p>Policies 2.1.3.1, 2, 3, 4, 5, 6, 7 and 9</p>	Support	<p>1. Recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu (sacred sites), and other taonga (treasures).</p> <p>2. Provide for development on Māori land that enables tāngata whenua:</p> <ul style="list-style-type: none"> a. to act in a way that is consistent with their culture and traditions b. to fulfil cultural, economic and social aspirations of those owners c. enhance their ability to exercise kaitiakitanga 	

		<p>d. strengthens their relationships with land, water, significant sites and Wāhi tapu.</p> <p>3. Recognise the importance of mātauranga Māori, kaitiakitanga and tikanga Māori in landuse planning and decision making.</p> <p>4. Recognise and support opportunities for tāngata whenua to exercise their customary responsibilities as mana whenua and kaitiaki.</p> <p>5. Recognise the wider constraints on the utilisation and development of māori land as different from land in freehold title.</p> <p>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.</p> <p>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.</p> <p>9. Recognise and support the incorporation of mātauranga Māori principles into the design,</p>	
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Pukawa D2 Trust

		development and/or operation of land use activities.	
Chapter 2 Strategic Directions Tāngata Whenua Policy 2.1.3.8	Support in part	Recognise that iwi management plans are higher order statutory documents in decision making, and the importance of iwi environmental management plans in providing important guidance and direction on the sustainable use and development of the environment and natural resources.	Making it clear that the iwi management plan takes precedence over the district plan. “Higher order statutory documents” is the terminology used in the section 32 report.
Chapter 2 Strategic Directions Natural Environment Values	Support in part	The Taupō district is characterised by important landscapes and natural areas. These areas are a strong part of the identity to the district and are valued by the local communities and mana whenua and some also hold importance nationally. As well as being an important part of the districts identity, these areas also have a range of important social, cultural and environmental (including intrinsic) values. The effects of human activities such as built development, vegetation clearance and land development etc. can significantly alter the character of the environment resulting in the loss of these areas and their values, if completed with little regard to the environment. While parts of the District have been significantly	Natural areas are valued by mana whenua. Not all areas hold national importance. It needs to be clear that some areas are regarded nationally. Built development is needed, a balance needs to be met.

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		<p>modified by human activity, vast areas of the natural landscape remain.</p> <p>These areas are on a range of public (reserve, forest and national parks) and private tenure. There is also a high proportion of these areas on māori land throughout the District which can impacts the ability of māori landowners in to undertaking development on their ancestral lands.</p>	
<p>Chapter 2 Strategic Directions Natural Environment Values</p> <p>Objective 2.6.2.1</p>	Support	Recognise the importance of the districts natural values and landscapes and their significance to the Taupō Districts communities and identity.	
<p>Chapter 2 Strategic Directions Natural Environment Values</p> <p>Objective 2.6.2.2</p>	Support in part	The protection of the natural values of areas of significant indigenous vegetation and significant habitats of indigenous fauna from the adverse effects of inappropriate development, including through offsetting to result in a net environmental gain.	Offsetting is a recognised tool.
<p>Chapter 2 Strategic Directions Natural Environment Values</p> <p>Objective 2.6.2.3</p>	Support in part	Activities which will lead to the enhancement of indigenous biodiversity values will be recognised and provided for, including activities used as an environmental offset.	Offsetting is a recognised tool.

Pukawa D2 Trust

Chapter 2 Strategic Directions Natural Environment Values Objective 2.6.2.4		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, as well as using land to provide for their communities as Māori see appropriate .	Restrictions have been placed by Council over Māori land tenure, which resulted in present vegetation growing over land that was always used as gardens. Over the past 20 years, the Trust has spent over \$1m to comply with Council in an endeavour to use their own land.
Chapter 2 Strategic Directions Natural Environment Values Objective 2.6.2.5 and 7	Support	5. The protection of outstanding landscape areas from inappropriate land use and development which may adversely affect their landscape attributes. 7. The natural character of riparian margins are preserved, and enhanced where appropriate, and protected from inappropriate subdivision, use and development.	Support in that it is linked to 'outstanding landscapes'.
Chapter 2 Strategic Directions Natural Environment Values Objective 2.6.2.6	Support	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.	Relationship should be recognised.
Chapter 2 Strategic Directions Natural Environment Values Policy 2.6.3.1	Support in part	Protect the natural values of areas of significant indigenous vegetation and significant habitats of indigenous fauna from land use and development activities that will	Restrictions have been placed by Council over Māori land tenure, which resulted in present vegetation growing over land that was always used as gardens. Offsetting should

Pukawa D2 Trust

		have more than minor adverse effects on the ecological values that cannot be offset. and processes important to those areas.	be available as a tool to achieve a net environmental gain.
Chapter 2 Strategic Directions Natural Environment Values Policy 2.6.3.2, 3, 4, 6	Support	2. Support and facilitate those activities which will lead to the long term protection and or enhancement of indigenous biodiversity values. 3. Recognise and provide for tāngata whenua in their role as kaitiaki of the natural values on their lands and the wider district. 4. Activities must recognise and maintain the attributes of identified outstanding natural features and landscapes and not have any more than minor adverse effects on them. 6. Recognise the contribution made by landowners to the protection and enhancement of areas of natural values and landscapes.	Agree that areas can be supported.
Chapter 2 Strategic Directions Natural Environment Values Policy 2.6.3.5	Support in part	5. Encourage the protection, enhancement and restoration of natural and landscape value areas, including by Supporting opportunities for tāngata whenua to exercise their customary responsibilities as mana whenua and	Allow tāngata whenua to decide what is best for their land.

Pukawa D2 Trust

		kaitiaki in restoring, protecting and enhancing these areas.	
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Last name: Curcio Lamas

On behalf of:
Ryman Healthcare Limited

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City:
Country: New Zealand

Email:
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Daytime Phone: 04 498 4919

- 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
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
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PO Box 2206
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First name: Alana

Last name: Delich

On behalf of:

Waikato

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Suburb:

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Country: New Zealand

Postcode: 3330

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Daytime Phone: 0276738851

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:

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

Yes

Additional requirements for hearing:

I am prepared to consider a joint submission with others making a similar submission.

Attached Documents

File

Alana Delich_Plan Change 43 Submission letter 7Dec22



RE: Submission on Plan Change 43 to the Taupō District Plan

I am writing this submission to encourage caution towards proposed Plan Change 43 – Taupō Industrial Land. In particular the re-zoning of the Broadlands Road West Area. The Broadlands Road West site is adjacent to the Broadlands Road geothermal area and includes potential areas of un-mapped geothermal habitat (outlined in pink in the included map), which have not been adequately assessed for the ecological value.

Industrial development has been allowed to occur adjacent to geothermal areas in the Taupō District in the past, without adequate assessment, delineation, and ecological protection of these areas. Although these are not a pristine geothermal ecosystems, they represent a unique habitat type that cannot be artificially created, and development of these areas contributes to the on-going decline of these critically endangered ecosystems.

Geothermal Ecosystems

In New Zealand, areas of geothermal vegetation are classified as naturally uncommon ecosystems, as they were rare prior to human colonisation. Of the five geothermal ecosystem types that have been identified, three are found within Broadlands Road geothermal area. These are Heated Ground, Fumaroles and Hydrothermally altered ground – now cool. All three of these rare geothermal ecosystems have been described as a critically endangered (Holdaway et al. 2012, Wiser et al. 2013).

Geothermal ecosystems require the correct surrounding geological conditions to exist. They cannot be created like a native forest or a wetland. That is why it is particularly important to protect the geothermal ecosystems we have left.

Geothermal areas often have plant assemblages that differ from the surrounding cooler areas. And due to the rarity of these ecosystems, that plants within them are also often rare. Geothermal kānuka (*Kunzea tenuicaulis*) is the predominant geothermal vegetation at Broadlands Road geothermal area and is a Threatened – Nationally Endangered species (De Lange et al. 2017).

Potential Effects of Development

Geothermal systems are naturally dynamic, and steam vents and areas of hot ground tend to “wander” or move spatially over time (Willoughby and Beard 2015). Therefore, it is important to retain an appropriate buffer of undeveloped land around any geothermal features to allow for this future wandering. In addition, Willoughby and Beard identify urban and industrial development as the adjacent land-use that has the greatest impact on the ecological integrity of geothermal ecosystems.

Although the evidence is anecdotal, another potential effect of development on the periphery of geothermal areas is the increase in impermeable surfaces potentially reducing the potential for rainwater recharge of shallow heated groundwater. Research has shown the Otumuheke Springs are fed by shallow groundwater, and that changes in rainfall may contribute to changes in the flow-rate of the springs (Bromley and Glover 1996). Therefore, the wider impacts on geothermally influenced shallow groundwater due to the ongoing increases in industrial development within the geothermal



areas of Taupō needs to be considered. Hydrological assessments should be undertaken as part of any consent applications for industrial development.

Review of PC43 Attachments

The S32 does review “Natural Values” within SNA108, and I note that “site 4” is set back 100m from SNA 108. However, the geothermal values have not been adequately taken into account. The 100m setback from SNA108 does not include the potential geothermal vents in the centre of the site (outlined in pink in the attached Figure 1 map).

I note that this area has been highlighted in Attachment D as “possible geothermal vents”. Cheal did find hot ground present towards the centre of the site. Any heated geothermal soils, or hydrothermally altered ground – now cool is a critically endangered ecosystem. From the photograph within the Cheal report there are small remnants of geothermal kānuka (*Kunzea tenuicaulis*) present which is a Threatened – Nationally Endangered species (De Lange et al. 2017).

The S32 does not review the Geothermal Module of the Waikato Regional Plan in the context of the Broadlands Road West site, and Significant Geothermal Features are not mapped. (Most recent map, as per Wildlands 2021 included in Figure 1).

Waikato Regional Plan – Module 7 -Geothermal Module

There are relevant rules in the Geothermal Module to the proposed plan change 43 at Broadlands Road West. In particular section 7.6.6 – Surface Activities Affecting Significant Geothermal Features. The geothermal module of the regional plan does not seem to have been reviewed as part of this plan change.

The Broadlands Road geothermal area is within the Wairakei-Tauhara geothermal system, this is classified as a development system under module 7 of the Waikato Regional Plan, as the geothermal field has been developed for the production of geothermal energy. In Development systems, all Significant Geothermal Features (SGF’s) are identified. SGF’s are as mapped in Section 7.10 of the Regional Plan. However, Implementation Methods for Policy 7, point 2. states that “Waikato Regional Council will introduce a variation to correct/update the maps in Section 7.10 of this plan for Significant Geothermal features as a consequence of new information obtained since notification”. The maps in Section 7.10 were updated by Variation No. 7 – Minor Variations and Geothermal Maps which became operative in December 2010, so another update would be timely.

The Glossary definition of Significant Geothermal Features includes “Geothermal habitat on heated ground or cooled acid ground: Any area of terrestrial habitat of thermotolerant indigenous species on current or formerly geothermally heated ground”. Therefore, an ecological assessment to map the full distribution of geothermal ecosystems, and geothermal kānuka at Broadlands Road Geothermal Area should be conducted as part of the information gathering to inform this plan change.

In Section 7.6.6. vegetation clearance and soil disturbance are only permitted within 20m of significant geothermal features if they are for the protection of the geothermal features (Rule 7.6.6.2). Therefore, any earthworks for development would not be permitted within 20m of an SGF without resource consent.

Mitigation

As the landholders will benefit financially from any plan change which re-zones this land to industrial land, it is prudent to think about the potential for future developers to contribute to ecological mitigation at this site.

There are opportunities to improve the existing geothermal ecosystem from the current baseline, which would also increase the resilience of this ecosystem to any potential environmental effects.

Potential mitigation is best achieved by buffering geothermal ecosystems with indigenous dominant vegetation. This increases the resilience of these ecosystems to change (e.g. in the instance of 'wandering' geothermal activity). A buffer should be at least 20m to comply with Rule 7.6.6.2 of the WRP, but a buffer of 50m would be more ecologically appropriate.

Mitigation to create an indigenous dominant buffer and increase the resilience of a geothermal ecosystem include fencing to exclude vehicles and industrial encroachment, weed control, planting of native buffer vegetation, and animal pest control.

Any mitigation needs to be enduring. Weed control must be followed up to ensure missed weeds are treated, and newly germinating weeds are managed. Native buffer planting will require release weeding to allow good establishment. Animal pest control will also require an enduring commitment to maintain healthy ecosystems.

Conclusion

The Broadlands Road West Site has not had adequate ecological assessment completed as part of this proposed plan change.

Potential hot vents towards the centre of the site (likely geothermal heated ground, or hydrothermally altered ground now cool – both critically endangered ecosystems) have not been included in the 100m setback from SNA108. These areas must be assessed by a qualified ecologist, and if found to be geothermal ecosystems, must be excluded from the plan change with an appropriate buffer (minimum 20m).

Any development of this site must come with conditions of contributing to the restoration of the adjoining geothermal systems, in order to halt the on-going decline of these critically endangered ecosystems.

Suggested Plan Change 43 text

If "Broadlands West" is to be re-zoned, I suggest that the following bulleted additions to the text in plan change 43, 4h.3.7 would address the concerns of this submission:

"...shall also include, but not be limited to:

- Ecological assessment of potential geothermal features,
- Ecological mitigation plan
- Hydrological assessment of effects of development on groundwater recharge."

Thank you for the opportunity to submit on Plan Change 43.

Ngā mihi

Alana Delich



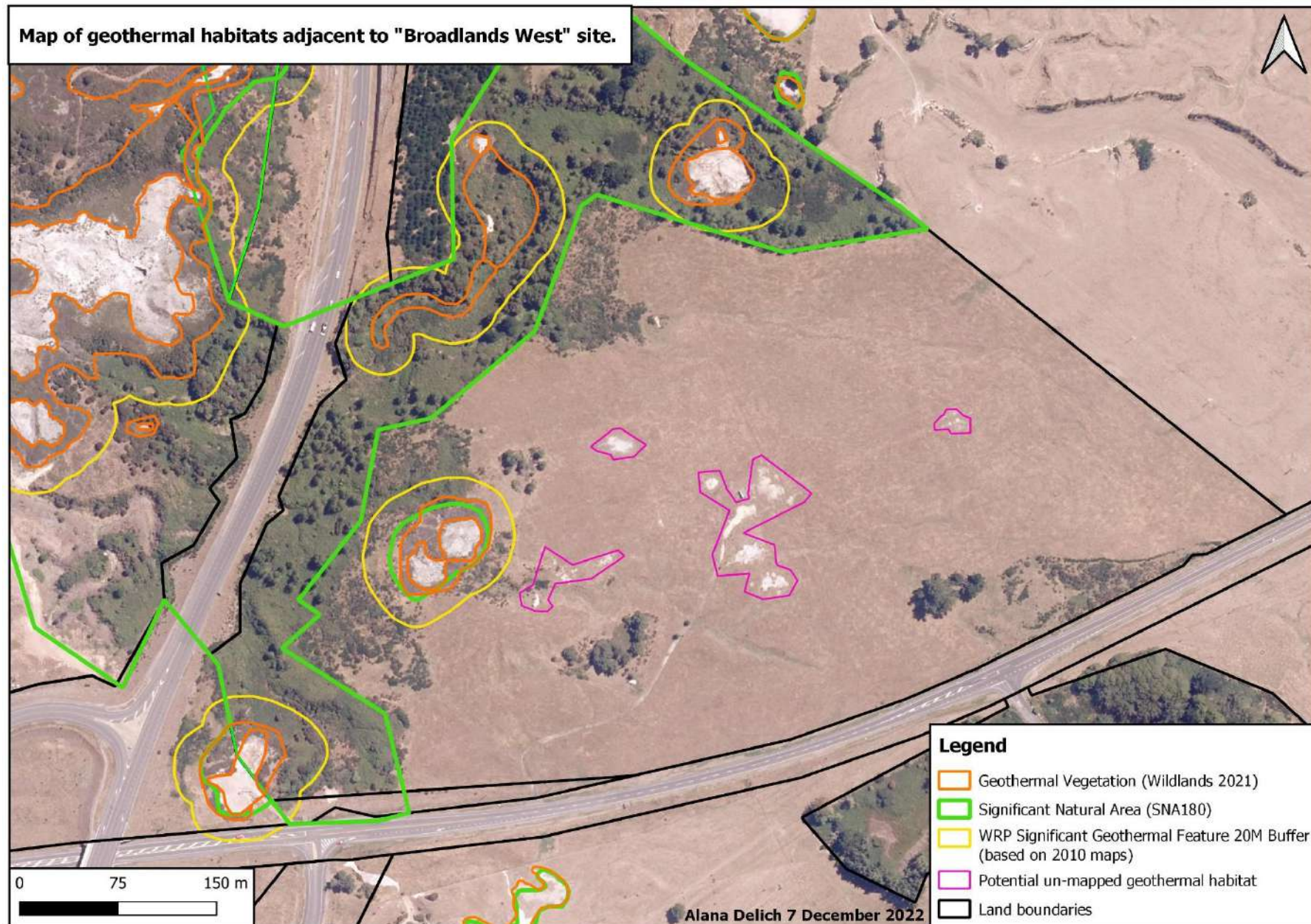
Senior Ecologist, Singers Ecological

Email: alana.delich@gmail.com, Ph: 027 673 8851

References

- Bromley, C. J. and Glover, R. B. (1996). CHANGES IN SHALLOW HYDROLOGY OF THE TAUHARA GEOTHERMAL FIELD. Proceedings 18th NZ Geothermal Workshop 1996. P. 63-68.
- de Lange, P.J.; Rolfe, J.R.; Barkla, J.W.; Courtney, S.P.; Champion, P.D.; Perrie, L.R.; Beadel, S.M.; Ford, K.A.; Breitwieser, I.; Schonberger, I.; Hindmarsh-Walls, R.; Heenan, P.B.; Ladley, K. (2018): Conservation status of New Zealand indigenous vascular plants, 2017. *New Zealand Threat Classification Series 22*. Department of Conservation, Wellington. 82 p.
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- Willoughby, B, and Beard, C. (2015). GEORGA: Managing biodiversity in geothermal sites. Waikato Regional Council Technical Report 2015/17.
- Wisser SK, Buxton RP, Clarkson BR, Hoare RJB, Holdaway RJ, Richardson SJ, Smale MC, West C, Williams PA. (2013). New Zealand's naturally uncommon ecosystems. In Dymond JR ed. Ecosystem services in New Zealand – conditions and trends. Manaaki Whenua Press, Lincoln, New Zealand. Pp. 49–61.

Figure 1: Map of geothermal vegetation, and potential un-mapped geothermal habitat adjacent to the "Broadlands West" site, proposed for re-zoning as Taupō Industrial Environment by Plan Change 43.



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Daytime Phone: 0273895278

- 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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Note to person making submission:

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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.

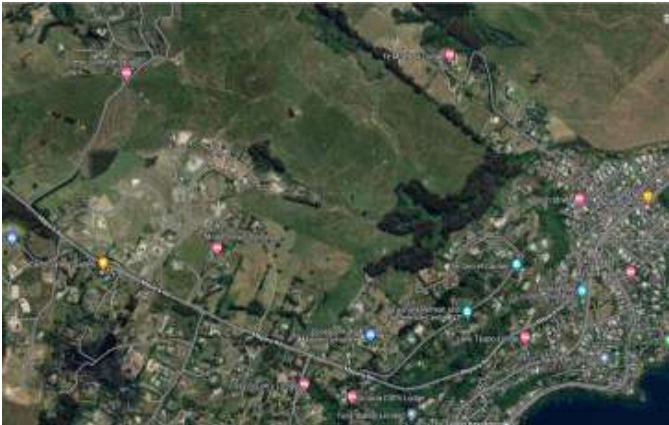
There is no public transport from Palmer Mill Road into town.

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

- 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.
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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 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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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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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.

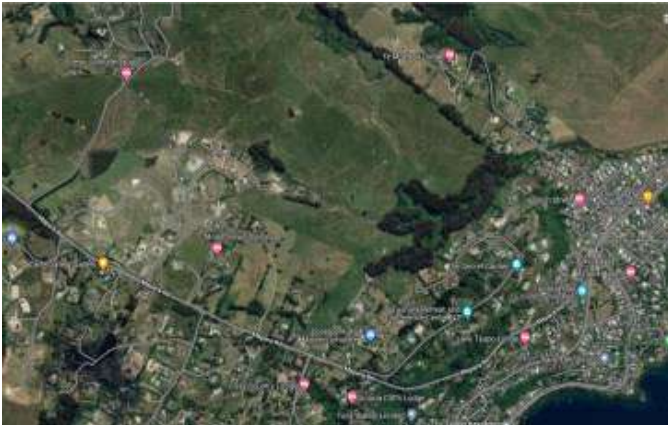
There is no public transport from Palmer Mill Road into town.

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.

Submission Table

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- 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
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 use and development	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 defunct through the fact the RMA 1991 caters for this already.	<ul style="list-style-type: none"> • Farmers already maintain water quality, as this is a requirement to farm healthy stock. • Self-responsibility.

		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?

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 NTNWRT 2022

Submission Table

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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
PC38-Strategic Directions	2.1 Strategic Direction 1 Tangata Whenua	Support	Retain	Recognises the principles of Te Tiriti o Waitangi as well s iwi values and aspirations
	2.2 Strategic Direction 2 Freshwater Quality / Te Mana o te Wai	Amend	Recognise the National Policy Statement for Freshwater Management (NPS-FM) which contains the principles of Te Mana o te Wai	Provides context for the relevance and importance of Te Mana o te Wai
	2.4 Strategic Direction 4 Climate Change	Support	Retain	Recognises how much importance the community (including iwi) places on climate change
	2.6 Strategic Direction 6 Natural Environment Values	Amend	Recognise the right of iwi Maori to provide for their social, cultural and economic wellbeing in developing underdeveloped land	Iwi Maori should not be disadvantaged in developing their land because it has natural environment values.
PC42-General Rural and Rural Lifestyle Environments	3b.2 Objectives and Policies General Rural Environment	Support	Retain	Recognises the needs and aspirations and relationship of iwi Maori with their whenua in the rural environment
	3b.3 Objectives and Policies Rural Lifestyle Environment	Support	Retain	Recognises the needs and aspirations and relationship of iwi Maori with their whenua in the rural environment
	4b.1.6 Rules and Standards Rural Environment Papakaiinga	Support	Retain	This section was amended/developed in conjunction with iwi



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Mercury

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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
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Note to person making submission:

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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 38 - Strategic Directions

Points: 68.1

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

Seek amendment

Retain policies 2.1.3(1) to 2.1.3(9) other than Policy 2.1.3(6) which should be deleted. Amend policies as shown below:

2.1.3 Policies

1. Recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu (sacred sites), and other taonga (treasures).
2. Provide for development on Māori land that enables tāngata whenua:
 - a. to act in a way that is consistent with their culture and traditions
 - b. to fulfil cultural, economic and social aspirations of those owners
 - c. enhance their ability to exercise kaitiakitanga
 - d. strengthens their relationships with land, water, significant sites and Wāhi tapu.
3. Recognise the importance of mātauranga Māori, kaitiakitanga and tikanga Māori in landuse planning and decision making.
4. Recognise and support opportunities for tāngata whenua to exercise their customary responsibilities as mana whenua and kaitiaki.
5. Recognise the wider constraints on the utilisation and development of Māori land as different from land in freehold title.
- ~~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.~~
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 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 the incorporation of mātauranga Māori principles into the design, development and/or operation of land use activities.

Include reason(s) for your submission point

Mercury supports all policies in 2.1.3 and Policy 2.1.3(2) in particular. This objective is consistent with the Matters of National Importance of the RMA and is appropriate in the context of supporting joint venture partnerships for several renewable electricity generation sites in the Taupo District.

Mercury is of the view that policy 2.1.3(6) should be deleted as it duplicates Policy 2.1.3(2).

Provision: Plan Change 38 - Strategic Directions

Points: 68.2

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

Retain 2.2.2 Objective in same or similar form

Include reason(s) for your submission point

Objective 2.2.2 states:

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.

This objective is consistent with the sustainable management purpose of the RMA and is appropriate in the context of the issues facing Taupo District.

Provision: Plan Change 38 - Strategic Directions

Points: 68.3

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

Seek amendment

Amend Objective 2.3.2(3) and add new Objective 2.3.2(8) as below:

3. Subdivision, use and development of land in appropriate locations which will have demonstrable social and cultural benefits to the District's community will be supported.

8. The East Taupō Arterial will continue to act as an 'urban fence' separating urban activities to the west from industrial and rural activities to the east including renewable electricity generation activities.

Include reason(s) for your submission point

An important aspect of the urban form of Taupō is the East Taupō Arterial being an 'urban fence' separating urban activities to the west (particularly residential activities) from industrial and rural activities to the east including renewable electricity generation activities. It is important to reinforce this as an enduring objective in the District Plan. The separation of incompatible activities is one of the most fundamental principles of sound planning and resource management practice. The ability to utilise the Wairākei-Tauhara Geothermal System for renewable electricity generation purposes, unfettered by the establishment of compatible urban activities, is recognised as a matter of both regional and national significance in the Waikato Regional Policy Statement (RPS) and the National Policy Statement for Renewable Electricity Generation (NPS-REG). The District Plan has a role to play in implementing the RPS and the NPS-REG.

Provision: Plan Change 38 - Strategic Directions

Points: 68.4

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

Seek amendment

Amend Policy 2.3.3(10) to read as follows:

10. Manage subdivision use and development of land to ensure that it will not:

- a. have an adverse effect on the functioning of the environment where it is located,
- b. unduly conflict with existing activities on adjoining properties and the surrounding areas.
- c. compromise development consistent with the intent and planned urban built form of the environment where it is located
- d. give rise to reverse sensitivity effects from existing uses

Include reason(s) for your submission point

Conflicts need to be avoided with activities in the wider surrounding environment, not just on adjoining properties.

Reverse sensitivity effects do not arise from "existing uses". They arise from new or expanded sensitive activities locating in proximity to existing uses.

Provision: Plan Change 38 - Strategic Directions

Points: 68.5

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

Seek amendment

Amend the introductory part of section 2.4 (STRATEGIC DIRECTION 4 CLIMATE CHANGE) as follows:

Climate change has been identified as an issue which is important globally and within the Taupō District. A warming environment, longer and drier droughts and increased intensity of storm events are anticipated. It is important that the District and its communities are able to adapt to the effects of climate change to be resilient and safe.

For environmental management and planning purposes there are two separate, but important aspects of climate change:

1. Effects on climate change – which refers to activities that may lead to an increase in greenhouse gases and those which may result in a reduction of greenhouse gases from discharged to the atmosphere or help to facilitate efforts towards decarbonisation, including the electrification of home heating, transport and industry.

2. Effects of climate change – which are the effects caused by climate change such as more frequent flooding, droughts or intensive weather events which can endanger communities, assets and infrastructure.

It is important to consider both of these aspects of climate change to effectively enable people and communities to provide for their social, economic, and cultural well-being and for their health and safety. Supporting positive climate change outcomes and ensuring that the effects of climate change are recognised and provided for will assist in planning for a district which helps avoid, does not contribute to, and is resilient to, climate change. 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.

Include reason(s) for your submission point

Mercury strongly supports section 2.4 (climate change) and requests only minor amendments.

Climate change is one the most significant issues facing the entire planet. As noted in the following section of the Plan (Section 2.5 Strategic Direction 5 Significant and Local Infrastructure), the Taupō District provides up to 20% of New Zealand's electricity supply. There are more than 20 renewable electricity power stations in the Taupō District, mostly located in the Rural Environment. It is therefore one of the most significant land uses in the Taupō District.

The importance of renewable electricity generation needs to be recognised and provided for in the Taupō District Plan, particularly within this section that sets out how climate change is to be addressed within the Taupō District. In that regard, the first priority should be to support activities that will help avoid climate change occurring in the first place. High on that list is renewable electricity generation.

Provision: Plan Change 38 - Strategic Directions

Points: 68.6

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

Seek amendment

Retain objectives, 2.4.2(1), 2.4.2(2) and 2.4.2(3).

In addition, add new objective 2.4.2(4) that reads:

4. An increase in the amount of electricity generated from renewable sources within the Taupo District to assist with the decarbonisation of the economy.

Include reason(s) for your submission point

Objectives 2.4.2(1), 2.4.2(2) and 2.4.2(3) are important for addressing the issues facing Taupo District, Aotearoa New Zealand and the world.

In addition, a new objective needs to clearly articulate the necessity of increased renewable electricity generation to assist with the decarbonisation of the economy (both within the Taupō District, regionally and nationally). This decarbonisation is essential for the country to achieve its international GHG reduction targets that it has committed to achieve.

Provision: Plan Change 38 - Strategic Directions

Points: 68.7

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

Seek amendment

Retain policies 2.4.3(1),

Delete policy 2.4.3(3) and policy 2.4.3(4)

In addition, add new policies 2.4.3(2) and 2.4.3(3) as below and renumber proposed policy 2.4.3.(2) to policy 2.4.3.(4) with a minor amendment as below.

1. Land use activities which will result in positive climate change outcomes, including through reducing greenhouse gas emissions and decarbonisation, will be supported and encouraged.

~~2. Land use activities which will unduly accelerate the effects of climate change will be discouraged.~~

- ~~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.~~
2. Recognise and provide for the use and development of the District's renewable energy resources to facilitate decarbonization of the economy, including a reduction in greenhouse gas emissions, increased electricity generation capacity, improved security of supply and transmission.
3. Enable the upgrading and maintenance of existing and new renewable electricity generation activities and transmission, including where contributing to one of the following:
- adaptation required to mitigate risks from climate change or
 - provides for increased electricity output, or greater efficiency
 - continued safe, efficient and secure operation.
- ~~24. Land use activities which will unduly accelerate the effects of climate change will be discouraged.~~

Include reason(s) for your submission point

Policies need to be included which specifically provide for and enable activities that will help address climate change.

Provision: Plan Change 38 - Strategic Directions

Points: 68.8

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

Seek amendment

Amend the introductory part of section 2.5 (STRATEGIC DIRECTION 5 SIGNIFICANT AND LOCAL INFRASTRUCTURE) as follows:

Infrastructure, as defined in the Resource Management Act generally encompasses physical services and facilities which enable society to function, such as the three waters network, transport, communications, energy electricity generation, transmission and distribution networks, and any other network utilities undertaken by network utility operators.

Infrastructure is critical to the social and economic wellbeing of people and communities, including providing for their health and safety, and has national, regional and local benefits. However, inappropriately located or designed land use activities can adversely affect the safe and effective functioning of significant and locally important infrastructure and the natural resources on which they rely on to operate.

The Taupō District plays an important role in the location and provision of nationally 'significant infrastructure'. Its central location and natural resources means that Taupō is home to:

- State highways (1, 5, 32, 41 and 47).
- the national grid electricity transmission network
- renewable electricity generation facilities that connect with the national grid, that provide electricity to meet up to 20% of New Zealand's total electricity demand
- Airports used for regular air transport services by aeroplanes

The Taupō District is also home to Regionally Significant Infrastructure including municipal waste water systems, the telecommunications and electricity networks.

In addition to nationally and regionally significant infrastructure, local roads and other infrastructure (including development and additional infrastructure) is vital for the ongoing functioning of the District District's urban and rural communities.

Include reason(s) for your submission point

The introduction should more accurately refer to "electricity generation", not "energy generation".

Renewable electricity generation activities is regionally significant whether or not it is connected to the national grid.

Provision: Plan Change 38 - Strategic Directions

Points: 68.9

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

Seek amendment

Retain the following Objectives, subject to minor amendments to Objective 2.5.2(1) and 2.5.2(2) as follows:
2.5.2 Objectives

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 **and protected** in decision making and land use planning.
2. The local and national benefits of the sustainable development, operation, maintenance and upgrading of electricity transmission and renewable electricity generation resources and activities are recognised and **encouraged achieved**.
3. Land use in the District will not adversely affect the capacity and the safe and effective functioning of nationally and regionally significant and local infrastructure required to service existing and future communities.
4. Local and national transport infrastructure located in the Taupō District operates in a safe and effective manner.

Include reason(s) for your submission point

Mercury supports all the objectives in 2.5.2 as infrastructure at all levels (locally, regionally and nationally significant infrastructure) is critical for the effective functioning and social and economic wellbeing of our communities.

A minor addition is sought to Objective 2.5.2(1) so that the outcome sought by the objective is not just the recognition of the importance and benefits of infrastructure but that there is also a tangible outcome in that the benefits are provided for,

A minor amendment to Objective 2.5.2(2) is requested to make the objective stronger as it is important to actually achieve these local and national benefits.

Provision: Plan Change 38 - Strategic Directions

Points: 68.10

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

Seek amendment

Retain the following policies, subject to minor amendments to Policy 2.5.3(1) and 2.5.3(2) as follows:

2.5.3 Policies

1. Recognise and provide for the national, regional and local benefits of renewable **energy-electricity** generation activities and resources, and transmission activities, in relation to climate change, security of supply, and social, and economic wellbeing of people and communities and for their health and safety.
2. Recognise **and provide for** the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure.
3. Subdivision, landuse and development will not adversely affect (including reverse sensitivity effects) the effective and safe functioning of infrastructure.
4. Planning and development of infrastructure will consider the needs and the wellbeing of current and future communities.
5. Recognise that infrastructure can have important environmental, economic, cultural and social effects.

Include reason(s) for your submission point

Mercury supports all the policies in 2.5.3 as infrastructure at all levels (locally, regionally and nationally significant infrastructure) is critical for the effective functioning and social and economic wellbeing of our communities. The policies are appropriate ways of achieving the objectives in 2.5.2.

Policy 2.5.3(1) should more accurately refer to “electricity generation”, not “energy generation”. One of the laws of physics is that energy cannot be generated. It can only be transformed from one form to another.

Policy 2.5.3(2) should be amended so that the policy direction is not just to *recognise* the functional and operational needs of infrastructure but to also to then do to *provide for* these important needs

Provision: Plan Change 38 - Strategic Directions

Points: 68.11

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

Seek amendment

Add the following new policy 2.6.3(7) as follows:

7. Recognise the benefits of offset measures and compensation and provide for their use as feasible alternatives to manage significant residual adverse effects of renewable electricity generation activities and regionally significant infrastructure.

Include reason(s) for your submission point

Mercury supports the addition of one additional policy which covers an increasingly important aspect of consenting renewable electricity generation activities.

Attached Documents

File
Mercury Submission Taupo DP PPC38
Mercury - Submission on PC38 - Final - 8 Dec 2022



Taupo District Council

Via email: hsamuel@taupo.govt.nz

Comments on Draft Taupo District Plan Strategic Issues and Rural Environment.

Mercury NZ Limited (Mercury) welcomes the opportunity to provide submissions on Plan Change 42 (General Rural and Rural Lifestyle Environments) and Plan Change 38 (Strategic Directions) to the Taupo District Plan. Working in the electricity supply sector, we recognise and fully support the urgent need to take bold action to achieve Aotearoa New Zealand's goals of reducing net GHG emissions to 50% below gross 2005 levels by 2030 and to reach net zero carbon emissions by 2050¹. The Taupo District is well positioned to play a significant role in New Zealand's successful transition to a low carbon economy, through the generation and delivery of secure, affordable and low carbon electricity to decarbonise home heating, transport and industry.

Taupo is strategically located within the central North Island, which has abundant electricity infrastructure. There are 21 existing electricity generation facilities within the District, as well as strategically located distribution and transmission infrastructure, which also needs to be used efficiently. It is highly likely that if New Zealand is to meet its climate change obligations, **significant expansion of existing electricity generation plant as well as new electricity generation facilities will be required to be built within the Taupo District in the short term**. The utilisation and optimisation of existing infrastructure, such as the national grid and relevant distribution infrastructure is also essential to ensure increased electricity output and efficiency gains can be achieved. It is for this reason, the explicit recognition of the use and development of renewable energy resources is needed within the District Plan, which is a primary regulatory tool. From Mercury's perspective more emphasis is needed within the District Plan to assist with decarbonisation, which is of critical importance to New Zealand. As the current operative District Plan has no dedicated Energy chapter, the Rural Zone chapter is the "default" chapter for energy sector provisions that address electricity infrastructure located within the rural environment.

The notified version of the two Plan Changes falls well short of the decarbonisation outcomes needed. Mercury has worked with other generators Contact, Genesis and Manawa to draft collective relief, to ensure the Taupo District Plan framework can provide for the following necessary decarbonisation outcomes relating to the use and development of renewable energy;

1. Provide an enabling framework for the use and development of renewable energy, whilst supporting the broader functioning of the general rural environment;
 - a. Objectives and Policies within the Climate Change (section 2.4) and Infrastructure (section 2.5) sections of the Strategic Directions chapter, which are relevant from a generation development perspective, this includes upgrading, in response to a changing environment.
 - b. Policies, rules and relevant standards within the General Rural Environment to provide for the implementation and regulation of land uses, which the majority of renewable electricity generation facilities and activities, which are located within the General Rural Environment.
 - c. Provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation within the General Rural Environment as a permitted activity e.g. wind monitoring masts and associated activities.
 - d. The framework should achieve a reduction of Green House Gas (GHG) emissions from the end use of energy, including associated with home heating, transport and industrial process heat. This relates to broader land use management policy outcomes for the end use of energy, such as providing for EV charging in public locations within the Rural Environment as a permitted activity.
2. Continue to provide for the maintenance and minor upgrading of existing REG activities under a permissive rule framework, which include;

¹ [Greenhouse gas emissions targets and reporting | Ministry for the Environment](#)



- a. Providing for (i.e. not encumbering) the efficient, safe adaptation of assets owned by lifeline utilities to mitigate identified risks from climate change e.g. civil and structural alterations to hydro assets in response to high flow and/or extreme weather events;
- b. Enabling increased REG output from existing generation sites, to increase New Zealand's electricity generation capacity, noting that electricity demand will significantly increase over time as transport and process industrial heat is electrified and supply must always meet demand.
- c. Protect renewable energy resources from reverse sensitivity conflicts, including for example, anticipated use of geothermal steam fields from lifestyle subdivision.

Mercury's interests in the Taupo District

Mercury is a Lifeline Utility infrastructure owner with electricity generation assets and activities within the Taupo District. Mercury is a vertically integrated generator and retailer of electricity throughout New Zealand. Mercury generates all its electricity from 100% renewable energy sources (hydro, geothermal and wind).

Mercury owns and operates the Waikato Hydro Scheme (WHS) which consists of eight dams and nine power stations on the Waikato River. The nine power stations have a total electricity generating capacity of approximately 1050MW and harness the power of water via the force of gravity. Critical infrastructure located within the Taupo District includes: Lake Taupo and the Taupo Control Gates, the Aratiatia, Ohakuri, Atiamuri, Whakamaru, Maraetai II, and Maraetai I (Left abutment/half of Dam) power stations – all of which are located within the General Rural Environment. WHS generation output is highly influenced by inflows into Lake Taupo and 20% of those inflows are derived from the Tongariro Power Scheme. Currently Lake Taupo storage range is limited to 1.4m and annual rainfall and snowmelt exceed this storage capacity resulting in water cycling through the lake 5-6 times a year. The ongoing maintenance and potential upgrade to ensure all infrastructure is able to be resilient to the effects from climate change is essential.

Mercury also owns and/or operates four geothermal power stations (Rotokawa, Nga Awa Purua, Ngatamariki and Mokai) in the Taupo District with a total net capacity of approximately 370 MW. These geothermal power stations provide baseload electricity that is not subject to climatic constraints, which complements the variable (peaking) from generation on the Waikato Hydro Scheme. With the exception of the Rotokawa power station, which is zoned industrial, all other power stations and geothermal area and activities are located within the General Rural Environment. Rotokawa geothermal power station is located within a fragmented industrial zone, surrounded by the General Rural Environment. The power station is connected to the National Grid via local distribution lines.

Mercury has REG (mainly wind) development interests within the district located within the General Rural Environment. To support development of these interests, a temporary activity such as erecting wind monitoring masts (which are needed to collect data on wind resources), should be enabled within the Rural Environment.

Addressing impacts of Climate Change will necessitate Adaptation, Mitigation, and Upgrading – all of which must be enabled.

The serious implications of climate change have been acknowledged by New Zealand in its ratification of the UNFCCC and the Paris Agreement, in government policy and in legislation. New Zealand has accepted the IPCC science and, pursuant to the Paris Agreement, has submitted a Nationally Determined Contribution to reduce net GHG emissions to 50% below gross 2005 levels by 2030.

Mercury seeks that Chapter 2 (Strategic Directions), and in particular section 2.4 (Climate Change), will drive all decarbonisation outcomes through a clear enabling framework, including Objectives and Policies which explicitly acknowledge the use and development of renewable energy resources, as well as the end use of energy which is fundamental to a successful transition for New Zealand. To put decarbonisation into perspective, if New Zealand is to meet its climate change (i.e. emission reduction) obligations (as noted in the first paragraph above), **approximately 70% more electricity supply from renewable resources will be necessary by 2050** to meet the increased demand from the electrification of transport, home heating and the conversion of industrial process heat from fossil based fuels to electricity. This is the scale of the very real challenge ahead.



Renewable energy projects are key to early GHG emission reductions needed to meet these commitments because the technology is mature, they are cost-effective and they are relatively politically palatable.² The effects of renewable energy projects are also readily understood.³ For New Zealand renewable energy is particularly critical because of the difficulties in addressing agricultural emissions and the country's intended reliance on electrification to replace fossil fuels in key areas (e.g. transport, industry and heating).

Climate Change – Safe Adaptation to a Changing Environment

Mercury considers the concepts of land use and risk are poorly articulated from a climate perspective, which is primarily relevant to “Effects of Climate Change” as noted Section 2.4. As the climate becomes more volatile, communities will potentially be exposed to increased or even intolerable risks, resulting in sub-optimal social, economic and cultural outcomes.

There are operational challenges associated with managing the effects of climate change, such as a warmer climate reducing the efficiency of geothermal generation, and/or managing more volatile hydrology from changing weather patterns. Lost generation output or system capacity will need to be replaced elsewhere in the electricity system, as supply must always meet demand if the lights are to stay on. It is expected there will be greater variability in weather events, more intense storms (which lead to high inflow events) as well as longer more extreme droughts, all of which create significant operational challenges for hydro power station owners.

The Waikato Hydro System can attenuate some (but not all) high flow events, as there is limited storage capacity in Lake Taupo and in the hydro lakes. The Waikato Hydro System also provides benefits for the wider community by ensuring water security during periods of low inflows. The Waikato Hydro Scheme is essentially a ‘run of river’ system but the dams along the river provide the ability to attenuate flows for the benefit of Waikato communities once the water is released from Lake Taupo. e.g. water supply resilience for all water uses such as municipal, rural and recreational activities, as well as geothermal activities (which are reliant upon water supply for cooling and drilling activities). There are also interdependencies between lifeline utilities that adaptation needs to be cognisant of.

Failure to adapt, or adequately manage risk could have significant consequences, including on the health and safety of people and their communities, and less reliability of lifeline utilities if operational thresholds/requirements are compromised. Adapting to manage the potential impacts from a more volatile environment is an important tool to successfully mitigate potential effects to an acceptable risk threshold. It is anticipated major upgrades will be required to the Taupo Control Gate structures (which dictates how much water flows down the Waikato River from Lake Taupo) and to spillways on dam structures to allow for **safe passage of water during high flow events**.

Strong consideration needs to be given to objectives and policies within Section 2.4 (Climate Change) to ensure sufficient consideration is given to this issue, as well as enabling permissive rules in direct response to adaptive requirements.

Operational Efficiency and Increasing Electricity Output from Existing Infrastructure Critical to Decarbonisation.

Renewable electricity generation activities need the ability to maximise generation output from existing sites and improve operational efficiencies if decarbonisation outcomes are to be realised and agreed targets reached. Mercury seeks exclusions from building footprint and setback requirements within all existing sites for structures within the General Rural Environment. This provides for greater ability to maintain and upgrade activities, which will be essential if the sector is to achieve decarbonisation outcomes.

Mercury supports the operative provisions which provide permissive rules enabling “maintenance and “minor upgrading” to all existing renewable electricity generation activities, rather than just EGCS's. However, further exemptions from building setbacks, SNAs, ONLs on existing sites are needed if an effective framework is to be provided. We note that future REG development will be subject to consent processes, so there will still be a mechanism to assess development effects against competing values. These changes are justified by increasing efficiencies and output which assist decarbonisation.

² As discussed by the IPCC and summarised below.

³ See eg NZS6808:2010 in relation to noise generated from wind turbines.



Rural Character

The General Rural Environment framework as notified lacks clarity and does not acknowledge the importance of renewable electricity generation activities as an appropriate activity within the context of the General Rural Environment. The use and context of the term "Rural Character" as notified is problematic. There is insufficient acknowledgement of working structures, effects and activities associated with renewable electricity generation activities and existence of energy resources, all of which are prevalent in the rural environment. Hydro dams, geothermal areas and activities such as power stations, drill rigs and geothermal pipelines are all working components of General Rural Environment. Looking forward to New Zealand's transition to a low carbon economy, wind farms, solar farms and battery storage systems are anticipated to occupy the General Rural Zone as well. There are also electricity distribution and transmission activities and structures, as well as industrial zoned renewable electricity generation facilities surrounded by the rural environment. It is not always reasonable to reduce effects to within site boundaries.

Electricity generation needs to be excluded from the definition of "rural industry", which is problematic from an implementation perspective. The generator group seeks to ensure rural character is well considered and recognises structures, effects and activities associated with development and use of renewable energy resources, which has a functional need to be located where energy resources exist. These outcomes coupled with recognition of functional need with policy, recognises the practical constraints associated with the use and development of renewable energy as provided for in the NPS-REG.

Functional Need to Locate Where Energy Resources are Located

Existing renewable electricity generation activities and future use and development have a functional need to exist where renewable energy resources are located.

Utilisation of energy resources needs to be protected from inappropriate sensitive land uses that could limit future use, or access. Activities within the General Rural Environment need to be cognisant of anticipated effects (odour, noise, visual effects (steam, light) subsidence) from the utilisation of renewable energy resources and existing renewable generation activities. The provision of lifestyle subdivision if not well planned around existing clusters within the Rural Environment could limit utilisation of geothermal energy, which will create future reverse sensitivity effects by constraining access to geothermal energy. Mercury seek changes to ensure the policy framework manages reverse sensitivity, and mechanisms to manage sensitive uses near renewable energy resources.

I would be happy to discuss any aspect of our submission with Council.

Yours sincerely



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ATTACHMENT A

Submissions on Proposed Change 38 to the Taupō District Plan – Strategic Directions

Plan Section / Provision	Support / Oppose	Relief Sought	Reasons for Submission
Chapter 2 Strategic Directions			
2.1.3 Policy	Support in part	<p>Retain policies 2.1.3(1) to 2.1.3(9) other than Policy 2.1.3(6) which should be deleted. Amend policies as shown below:</p> <p>2.1.3 Policiesy</p> <ol style="list-style-type: none"> 1. Recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu (sacred sites), and other taonga (treasures). 2. Provide for development on Māori land that enables tāngata whenua: <ol style="list-style-type: none"> a. to act in a way that is consistent with their culture and traditions b. to fulfil cultural, economic and social aspirations of those owners c. enhance their ability to exercise kaitiakitanga d. strengthens their relationships with land, water, significant sites and Wāhi tapu. 3. Recognise the importance of mātauranga Māori, kaitiakitanga and tikanga Māori in landuse planning and decision making. 4. Recognise and support opportunities for tāngata whenua to exercise their customary responsibilities as mana whenua and kaitiaki. 5. Recognise the wider constraints on the utilisation and development of māori land as different from land in freehold title. 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. 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 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 the incorporation of mātauranga Māori principles into the design, development and/or operation of land use activities. 	<p>Mercury supports all policies in 2.1.3 and Policy 2.1.3(2) in particular. This objective is consistent with the Matters of National Importance of the RMA and is appropriate in the context of supporting joint venture partnerships for several renewable electricity generation sites in the Taupo District.</p> <p>Mercury is of the view that policy 2.1.3(6) should be deleted as it duplicates Policy 2.1.3(2).</p>
2.2.2 Objective	Support	Retain 2.2.2 Objective in same or similar form	<p>Objective 2.2.2 states: <i>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.</i></p>

Plan Section / Provision	Support / Oppose	Relief Sought	Reasons for Submission
			This objective is consistent with the sustainable management purpose of the RMA and is appropriate in the context of the issues facing Taupo District.
2.3.2 Objectives Objective 2.3.2(3) Requested new Objective 2.3.2(8)	Support in part	Amend Objective 2.3.2(3) and add new Objective 2.3.2(8) as below: 3. Subdivision, use and development of land <u>in appropriate locations</u> which will have demonstrable social and cultural benefits to the District's community will be supported. <u>8. The East Taupō Arterial will continue to act as an 'urban fence' separating urban activities to the west from industrial and rural activities to the east including renewable electricity generation activities.</u>	An important aspect of the urban form of Taupō is the East Taupō Arterial being an 'urban fence' separating urban activities to the west (particularly residential activities) from industrial and rural activities to the east including renewable electricity generation activities. It is important to reinforce this as an enduring objective in the District Plan. The separation of incompatible activities is one of the most fundamental principles of sound planning and resource management practice. The ability to utilise the Wairākei-Tauhara Geothermal System for renewable electricity generation purposes, unfettered by the establishment of compatible urban activities, is recognised as a matter of both regional and national significance in the Waikato Regional Policy Statement (RPS) and the National Policy Statement for Renewable Electricity Generation (NPS-REG). The District Plan has a role to play in implementing the RPS and the NPS-REG.
2.3.3 Policy Policy 2.3.3(10)	Support in part	Amend Policy 2.3.3(10) to read as follows: 10. Manage subdivision use and development of land to ensure that it will not: <ol style="list-style-type: none"> have an adverse effect on the functioning of the environment where it is located, unduly conflict with existing activities on adjoining properties <u>and the surrounding areas.</u> compromise development consistent with the intent and planned urban built form of the environment where it is located give rise to reverse sensitivity effects from existing uses 	Conflicts need to be avoided with activities in the wider surrounding environment, not just on adjoining properties. Reverse sensitivity effects do not arise from "existing uses". They arise from new or expanded sensitive activities locating in proximity to existing uses.
2.4 Strategic Direction 4 Climate Change	Support in part	Amend the introductory part of section 2.4 (STRATEGIC DIRECTION 4 CLIMATE CHANGE) as follows: Climate change has been identified as an issue which is important <u>globally and within the Taupō District</u> . A warming environment, longer and drier droughts and increased intensity of storm events are anticipated. It is important that the District and its communities are able to adapt to the effects of climate change to be resilient and safe. For environmental management and planning purposes there are two separate, but important aspects of climate change: <ol style="list-style-type: none"> Effects on climate change – which refers to activities that may lead to an increase in greenhouse gasses and those which may result in a reduction of greenhouse gasses from discharged to the atmosphere or help to facilitate efforts towards decarbonisation, <u>including the electrification of home heating, transport and industry.</u> Effects of climate change – which are the effects caused by climate change such as more frequent flooding, droughts or intensive weather events which can endanger communities, assets and infrastructure. It is important to consider both of these aspects of climate change to effectively enable people and communities to provide for their social, economic, and cultural well-being and for their health and safety. Supporting positive climate change outcomes and ensuring that the effects of climate change are recognised and	Mercury strongly supports section 2.4 (climate change) and requests only minor amendments. Climate change is one the most significant issues facing the entire planet. As noted in the following section of the Plan (Section 2.5 Strategic Direction 5 Significant and Local Infrastructure), the Taupō District provides up to 20% of New Zealand's electricity supply. There are more than 20 renewable electricity power stations in the Taupō District, mostly located in the Rural Environment. It is therefore one of the most significant land uses in the Taupō District. The importance of renewable electricity generation needs to be recognised and provided for in the Taupō District Plan, particularly within this section that sets out how climate change is to be addressed within the Taupō District. In that regard, the first priority should be to support activities that will help avoid climate change occurring in the first place. High on that list is renewable electricity generation.

Plan Section / Provision	Support / Oppose	Relief Sought	Reasons for Submission
		provided for will assist in planning for a district which <u>helps avoid</u> , does not contribute to, and is resilient to, climate change. 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.	
2.4.2 Objective Requested new objective 2.4.2(4)	Support in part	Retain objectives, 2.4.2(1), 2.4.2(2) and 2.4.2(3). In addition, add new objective 2.4.2(4) that reads: <u>4. An increase in the amount of electricity generated from renewable sources within the Taupo District to assist with the decarbonisation of the economy.</u>	Objectives 2.4.2(1), 2.4.2(2) and 2.4.2(3) are important for addressing the issues facing Taupo District, Aotearoa New Zealand and the world. In addition, a new objective needs to clearly articulate the necessity of increased renewable electricity generation to assist with the decarbonisation of the economy (both within the Taupō District, <u>regionally</u> and nationally). This decarbonisation is essential for the country to achieve its international GHG reduction targets that it has committed to achieve.
2.4.3 Policy Requested new policy 2.4.3(2) and policy 2.4.3(3)	Support in part	Retain policies 2.4.3(1), Delete policy 2.4.3(3) and policy 2.4.3(4) In addition, add new policies 2.4.3(2) and 2.4.3(3) as below and renumber proposed policy 2.4.3.(2) to policy 2.4.3.(4) with a minor amendment as below. 1. Land use activities which will result in positive climate change outcomes, including through reducing greenhouse gas emissions and decarbonisation, will be supported and encouraged. 2. Land use activities which will unduly accelerate the effects of climate change will be discouraged. 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. <u>2. Recognise and provide for the use and development of the District's renewable energy resources to facilitate decarbonization of the economy, including a reduction in greenhouse gas emissions, increased electricity generation capacity, improved security of supply and transmission.</u> <u>3. Enable the upgrading and maintenance of existing and new renewable electricity generation activities and transmission, including where contributing to one of the following:</u> <ul style="list-style-type: none"> • <u>adaptation required to mitigate risks from climate change or</u> • <u>provides for increased electricity output, or greater efficiency</u> • <u>continued safe, efficient and secure operation.</u> 24. Land use activities which will unduly accelerate the effects of climate change will be discouraged.	Policies need to be included which specifically provide for and enable activities that will help address climate change.
2.5 Strategic Direction 5 Significant and local infrastructure	Support in part	Amend the introductory part of section 2.5 (STRATEGIC DIRECTION 5 SIGNIFICANT AND LOCAL INFRASTRUCTURE) as follows: Infrastructure, as defined in the Resource Management Act generally encompasses physical services and facilities which enable society to function, such as the three waters network, transport, communications, energy <u>electricity</u> generation,	The introduction should more accurately refer to "electricity generation", not "energy generation". Renewable electricity generation activities is regionally significant whether or not it is connected to the national grid.

Plan Section / Provision	Support / Oppose	Relief Sought	Reasons for Submission
		<p>transmission and distribution networks, and any other network utilities undertaken by network utility operators.</p> <p>Infrastructure is critical to the social and economic wellbeing of people and communities, including providing for their health and safety, and has national, regional and local benefits. However, inappropriately located or designed land use activities can adversely affect the safe and effective functioning of significant and locally important infrastructure <u>and the natural resources on which they rely on to operate.</u></p> <p>The Taupō District plays an important role in the location and provision of nationally 'significant infrastructure'. Its central location and natural resources means that Taupō is home to:</p> <ul style="list-style-type: none"> • State highways (1, 5, 32, 41 and 47). • the national grid electricity transmission network • renewable electricity generation facilities <u>that connect with the national grid, that provide electricity to meet</u> up to 20% of New Zealand's total electricity demand • Airports used for regular air transport services by aeroplanes <p>The Taupō District is also home to Regionally Significant Infrastructure including municipal waste water systems, the telecommunications and electricity networks.</p> <p>In addition to nationally and regionally significant infrastructure, local roads and other infrastructure (including development and additional infrastructure) is vital for the ongoing functioning of the <u>District District's</u> urban and rural communities.</p>	
2.5.2 Objectives	Support in part	<p>Retain the following Objectives, subject to minor amendments to Objective 2.5.2(1) and 2.5.2(2) as follows:</p> <p>2.5.2 Objectives</p> <ol style="list-style-type: none"> 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 <u>and protected</u> in decision making and land use planning. 2. The local and national benefits of the sustainable development, operation, maintenance and upgrading of electricity transmission and renewable electricity generation resources and activities are recognised and <u>encouraged achieved.</u> 3. Land use in the District will not adversely affect the capacity and the safe and effective functioning of nationally and regionally significant and local infrastructure required to service existing and future communities. 4. Local and national transport infrastructure located in the Taupō District operates in a safe and effective manner. 	<p>Mercury supports all the objectives in 2.5.2 as infrastructure at all levels (locally, regionally and nationally significant infrastructure) is critical for the effective functioning and social and economic wellbeing of our communities.</p> <p>A minor addition is sought to Objective 2.5.2(1) so that the outcome sought by the objective is not just the recognition of the importance and benefits of infrastructure but that there is also a tangible outcome in that the benefits are provided for,</p> <p>A minor amendment to Objective 2.5.2(2) is requested to make the objective stronger as it is important to actually achieve these local and national benefits.</p>
2.5.3 Policy	Support in part	<p>Retain the following policies, subject to minor amendments to Policy 2.5.3(1) and 2.5.3(2) as follows:</p> <p>2.5.3 Policies</p> <ol style="list-style-type: none"> 1. Recognise and provide for the national, regional and local benefits of renewable <u>energy-electricity</u> generation activities and resources, and transmission activities, 	<p>Mercury supports all the policies in 2.5.3 as infrastructure at all levels (locally, regionally and nationally significant infrastructure) is critical for the effective functioning and social and economic wellbeing of our communities. The policies are appropriate ways of achieving the objectives in 2.5.2.</p>

Plan Section / Provision	Support / Oppose	Relief Sought	Reasons for Submission
		<p>in relation to climate change, security of supply, and social, and economic wellbeing of people and communities and for their health and safety.</p> <p>2. Recognise <u>and provide for</u> the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure.</p> <p>3. Subdivision, landuse and development will not adversely affect (including reverse sensitivity effects) the effective and safe functioning of infrastructure.</p> <p>4. Planning and development of infrastructure will consider the needs and the wellbeing of current and future communities.</p> <p>5. Recognise that infrastructure can have important environmental, economic, cultural and social effects.</p>	<p>Policy 2.5.3(1) should more accurately refer to “electricity generation”, not “energy generation”. One of the laws of physics is that energy cannot be generated. It can only be transformed from one form to another.</p> <p>Policy 2.5.3(2) should be amended so that the policy direction is not just to <i>recognise</i> the functional and operational needs of infrastructure but to also to then do <i>provide for</i> these important needs,</p>
<p>2.6.3 Policy Requested new objective 2.6.3(7)</p>	<p>Support in part</p>	<p>Add the following new policy 2.6.3(7) as follows:</p> <p><u>7. Recognise the benefits of offset measures and compensation and provide for their use as feasible alternatives to manage significant residual adverse effects of renewable electricity generation activities and regionally significant infrastructure.</u></p>	<p>Mercury supports the addition of one additional policy which covers an increasingly important aspect of consenting renewable electricity generation activities.</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 42 - General Rural and Rural Lifestyle Environments

Points: 68.12

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

Oppose

Amend the definition of **Rural Industry** as follows.

Rural Industry – 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**.

Insert a new definition of Renewable Electricity Generation as follows (being the same definition in the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG):

Renewable electricity generation means generation of electricity from solar, wind, hydro-electricity, geothermal, biomass, tidal, wave, or ocean current energy sources.

Include reason(s) for your submission point

Mercury opposes the inclusion of “geothermal / electricity generation” within the definition of Rural Industry.

Renewable electricity generation is an activity that has been recognised in the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG) as a matter of national significance. Renewable electricity generation is also an activity identified in the Waikato and Bay of Plenty Regional Policy Statements (RPS) as a Regionally Significant Infrastructure. It is therefore inappropriate to treat the activity of Renewable Electricity Generation as part of, and in the same manner as, other activities that occur in the rural environment such as forestry, agriculture and dairy farming. The elevated status and importance of Renewable Electricity

Mercury opposes the inclusion of Renewable Electricity Generation activities within the definition of ‘Rural Industry’. The 21 power generation facilities within the existing rural environment in the Taupo District are located there, as there is a functional need to be located where energy resources exist. They are not simply a ‘Rural Industry’ because they are located in a ‘Rural Environment’, they are ‘Renewable Electricity Generation’ activities located in the ‘Rural Environment’.

In addition to the above primary reason, the notified definition also does not work because of its sentence structure. Specifically, the use of the word “and” in the first sentence of the definition (shown in bold below) means that to meet the definition an activity has to be dependent on primary production – which electricity generation clearly is not. Even though the second sentence of definition carries on to state that these activities “include” and geothermal/electricity generation, the second sentence effectively contradicts the first sentence.

*Rural Industry – 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.*

The easiest way to resolve the above sentence structure issue, and also address the more fundamental points about the national significance of REG activities, is to separate the definitions as requested in this submission point and the one that follows.

Due to the nature of the following submissions by Mercury, two additional definitions need to be included in the Taupō District Plan.

The proposed new definition of Renewable Electricity Generation activities, is the same definition as in the NPS-REG.

The proposed new definition of Reverse Sensitivity is the same definition as in the Waikato RPS.

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

Points: 68.13

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

Seek amendment

Insert a new definition for Renewable Electricity Generation activities as follows.

Renewable Electricity Generation activities means the construction, operation and maintenance of structures associated with renewable electricity generation. This includes small and community-scale distributed renewable generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.

Insert a new definition for Reverse Sensitivity as follows:

Reverse sensitivity is the vulnerability of a lawfully established activity to a new activity or land use. It arises when a lawfully established activity causes potential, actual or perceived adverse environmental effects on the new activity, to a point where the new activity may seek to restrict the operation or require mitigation of the effects of the established activity.

Include reason(s) for your submission point

Due to the nature of the following submissions by Mercury, two additional definitions need to be included in the Taupō District Plan.

The proposed new definition of Renewable Electricity Generation activities, is the same definition as in the NPS-REG.

The proposed new definition of Reverse Sensitivity is the same definition as in the Waikato RPS.

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

Points: 68.14

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

Seek amendment

Amend the Introduction to Chapter 3b.1 as follows:

3b.1 Introduction

The Rural Environment makes up most of the land within the District and has been categorised into two distinct areas, being the General Rural Environment and the Rural Lifestyle Environment. These separate areas highlight the increasing need to protect the open space characteristics of the Rural Environment and its production values, while also providing for the growth of the District and the demand for rural lifestyle living in specific locations.

The Rural Environment also contains sites that are of significance, some of these are identified as Outstanding Landscape Areas. The Rural Environment objectives and policies seek to manage subdivision and land use activities in a way that reflects the productive nature of the land, the rural level of infrastructural services and the amenity values of the landscape, as well as managing effects and enabling rural lifestyle living in appropriate areas. Other activities that are anticipated in the Rural Environment are tourism activities, visitor accommodation and renewable electricity generation and transmission. It is important that all such activities do not affect the ability of the rural environment to function effectively. It is also important to acknowledge that existing, lawfully established activities in the Rural Environment are able to continue operating and that activities that choose to locate in close proximity to these activities are aware of the effects they can generate and that the Rural Environment is the best location for these activities. It is expected in the Rural Environment that all properties are self-servicing in terms of the provision of potable water and the disposal of stormwater and wastewater.

The papakāinga provisions recognise the intent of Part 2 of the RMA and provide for the occupation by whanau, hapū or iwi members on Māori land. The provisions recognise the importance of enabling Māori to settle on their ancestral lands. Papakāinga development will often be at higher densities than other residential land uses in the rural environment. Papakāinga may also have associated social, cultural or commercial aspects to support the community who reside there.

In addition to papakāinga there is a wide range of cultural activities and activities of importance to Māori which are appropriate to occur within the rural environment.

General Rural Environment

The General Rural Environment is predominantly characterised by large open space and vegetated areas including productive farmland and forest, ridgelines, native bush, lakes, rivers and their margins. Other prime characteristics of the General Rural Environment are the diverse range of land uses including farming, horticulture, energy **sources** and plantation forestry activities, with dispersed buildings and rural roads. There is also a wide range of development associated with tourism activities, recreation, and the District is one of New Zealand's most significant for the generation, storage and transmission of renewable electricity.

The purpose of separating the General Rural Environment from the Rural Lifestyle Environment is to preserve the productive potential of the land **and other natural resources** within the General Rural Environment by retaining large property sizes and limiting the extent of housing provided for, ~~yet~~ allowing appropriate development to occur while preserving the rural character of the General Rural Environment. The creation of the General Rural Environment aims to support primary productive uses, **renewable electricity generation activities**, and rural industry, **meaning an activity being activities** that directly supports, services, ~~or is~~ **are** dependent on primary production and/or **have** a locational **or functional** need to be within the General Rural Environment (rather than an urban environment).

~~Primary production a~~ Activities in the General Rural Environment will produce effects that are different from urban areas, such as noise, odour, vibration, spray drift and dust. Allowing these activities to operate in a more suitable environment, along with compatible activities, aims to protect rural land uses from unnecessary restrictions.

The General Rural Environment provisions seek to limit the scale of commercial and industrial activities unless they are dependent on primary production and/or have a **locational functional or operational** need to be within the General Rural Environment. This is to avoid the uptake of General Rural Environment land by activities which are provided for in other Environments and may therefore impact on the land available for primary production activities within the General Rural Environment.

Rural Lifestyle Environment

The Rural Lifestyle Environment has been created to address the increasing demand for rural lifestyle living within the Rural Environment. The Rural Lifestyle Environment aims to provide for rural residential development in specific locations for those who want the benefits of rural living without necessarily undertaking a productive rural activity.

By creating separate areas in appropriate locations within the Rural Environment, the Rural Lifestyle Environment creates areas for rural living on smaller property sizes, whilst retaining separation from the rural production **and other** activities **predominating** in the General Rural Environment. This separation of activities serves to minimise reverse sensitivity issues. By concentrating rural residential development within the Rural Lifestyle Environment this serves to preserve **the open space characteristics rural character** and **the** productive potential of the rest of the Rural Environment, and to reduce the potential for land use conflict.

The Rural Lifestyle Environment will be less populated than a Residential Environment, with standards in place for minimum lot sizes to preserve the rural residential aspect of the area. Limited provision is also made for home business and commercial activity to occur, but not of a scale or extent that changes the predominantly rural residential amenity and character intended. The Rural Lifestyle Environment areas are located **closer in proximity** to urban areas to allow for access to community facilities within the district's townships

Include reason(s) for your submission point

The introductory statement to Chapter 3b provides context about the nature and character of the District's rural environment, and the activities that are anticipated to occur within it.

Mercury generally supports the introductory statement but seeks minor changes to recognise the importance and functional need for renewable electricity generation to occur within the Rural Environment, its contribution to the regional economy and New Zealand's security of electricity supply.

These changes also reflect the need to ensure that renewable electricity generation activities are protected from potential reverse sensitivity effects (such as housing, visitor accommodation and lifestyle development both within the General Rural Environment and the new Rural Lifestyle Environment), and that if sensitive and incompatible activities do establish, they do not constrain the ability of renewable electricity generation activities to continue operating efficiently and effectively.

Mercury supports the statement about creating Rural Lifestyle Environments "*in appropriate locations within the Rural Environment*".

Mercury also supports the statement: "*By concentrating rural residential development within the Rural Lifestyle Environment this serves to preserve the open space characteristics and productive potential of the rest of the Rural Environment, and to reduce the potential for land use conflict.*".

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

Points: 68.15

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

Seek amendment

Retain Objective 3b.2.1 with amendments.

Objective 3b.2.1 Enable Primary Production **and the Use of Natural Resources**

Primary production **and the use of natural resources** are enabled by protecting the availability of **the** rural land **and other** resources and **its their** productive capability.

Include reason(s) for your submission point

Mercury supports Objective 3b.2.1 with an amendment so that it covers a wider range of uses anticipated in the General Rural Environment beyond just "primary production".

In accordance with s75(3) of the RMA District objectives and policies must give effect to existing RPS objectives and policies. Objective IM-02 in the Waikato RPS is 'Resource Use and Development'. One of the policies which achieves Objective IM-02 is IM-P4 'Regionally Significant Industry and Primary Production'. The suggested amendments give effect to the Waikato RPS.

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

Points: 68.16

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

Oppose

Amend Objective 3b.2.2 to read:

Objective 3b.2.2 ~~Maintaining the established General~~ Rural character

~~The established character of the General Rural Environment is maintained and the cumulative erosion of its character through incremental subdivision and development is avoided.~~

Enable a range of activities in the General Rural Environment that are compatible with rural character.

Include reason(s) for your submission point

Mercury is of the view that Objective 3b.2.2 is misguided and seeks to achieve the wrong outcome. Firstly, it presupposes that the established character of the General Rural Environment represents a good environmental outcome in all respects to the extent that it should be “maintained”. Secondly, an objective that seeks to maintain the “established character” is essentially seeking no change. The objective seeks to avoid “incremental subdivision and development” which essentially locks in the status quo and will make it difficult for any new development to occur, including new development that has been identified in other planning provision as being appropriately located in the General Rural Environment.

As an example, a new geothermal power station will definitely change the character of the part of the General Rural Environment in which it is proposed and ultimately constructed which is an outcome contrary to Objective 3b.2.2. The same applies for other forms of development such as the construction and operation of a dairy shed.

The wording of some of the existing planning provisions in the Rural Environment have been proposed as alternative wording for Objective 3b.2.2.

The relief sought focuses on the use of “rural character” which scope of activities, affect and structure are outlined in the amended Policy 3.b.2.9 below.

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

Points: 68.17

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

Seek amendment

Retain Objective 3b.2.3.

Insert a new objective following Objective 3b.2.3 as follows:

Objective 3b.2.X Renewable Electricity Generation and Transmission Activities

Enable the development, operation, maintenance and upgrading of renewable electricity generation activities and transmission activities in the General Rural Environment.

Include reason(s) for your submission point

Due to its elevated status under the NPS-REG, Mercury’s earlier submission point (above) seeks that the definition of Rural Industry be amended to delete any reference to electricity generation and that a new definition of Renewable Electricity Generation and Renewable Electricity Generation Activities be included in the Plan. Consistent with that request, and for the same reasons, , a new objective needs to be included in the Plan to enable renewable electricity generation activities (and transmission activities by association).

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

Points: 68.18

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

Seek amendment

Provided that new Objective 3b.2.X is added as requested above, amend Objective 3b.2.4 as follows:

Objective 3b.2.4 Other activities

Māori cultural activities, tourism activities, ~~and~~ visitor accommodation ~~and renewable electricity generation and transmission~~ activities are enabled in appropriate locations within the General Rural Environment.

Include reason(s) for your submission point

As a consequential change to the relief sought above (inserting a new objective in relation to renewable electricity generation activities), Objective 3b.2.4 needs to be amended to remove the reference to renewable electricity generation (and transmission by association).

Visitor accommodation is a sensitive activity and should only be enabled in appropriate locations within the General Rural Environment rather than enabled anywhere including in locations whereby reverse sensitivities could arise.

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

Points: 68.19

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

Seek amendment

Amend Objective 3b.2.5 as follows:

Objective 3b.2.5 Avoidance of reverse sensitivity

Reverse sensitivity effects on permitted, **and** legally established, **and/or consented** activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided.

Include reason(s) for your submission point

Mercury supports an objective in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects. However, Mercury is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already exists. This is particularly concerning for Mercury. The objective needs to also cover consented activities which have yet to be constructed / undertaken.

Mercury's geothermal generation activities occur in the District's General Rural Environment (as identified in the introductory text to this chapter and Strategic Directions chapter).

From time-to-time new wells and pipelines will be required to establish to support the on-going operation of its geothermal generation plants.

This objective and policy framework could allow a proliferation of new houses to establish in areas of the rural environment because there are few if any rural production activities operating.

Reverse sensitivity is an issue for Mercury. The introduction of new sensitive activities into the rural environment where rural production and renewable electricity generation exist has the potential to create complaints as the two are incompatible

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

Points: 68.20

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

Oppose

Amend Objective 3b.2.6 as follows:

Objective 3b.2.6 Impacts on infrastructure

The impacts **on infrastructure** arising from subdivision and development **are managed** do not compromise the safe and efficient functioning of infrastructure.

Include reason(s) for your submission point

An objective (or policy) that only seeks to "manage" something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupō District Plan.

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

Points: 68.21

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

Oppose

Amend Policy 3b.2.9 as follows:

Policy 3b.2.9 ~~Maintaining the established Rural~~ character

Enable activities in the ~~Maintain the established~~ General Rural Environment ~~that will not compromise the character of the General Rural Environment~~, as defined by:

- ~~a) Extensive pastoral farming and forestry~~
- ~~b) Renewable Electricity Generation Activities~~
- ~~c) Geothermal areas and activities, electricity transmission and distribution~~
- ~~ad) Large open spaces between built structures~~
- ~~be) A mix of residential and rural industry buildings~~
- ~~c) Noises related to production activities during the day but low levels of noise at night~~
- ~~d) Low levels of light spill~~
- ~~f) Effects from activities including noise, vibration, dust, odour and visual effects~~
- ~~eg) Infrequent vehicle movements to and from a site~~
- ~~fh) Limited signage that directly relates to the activity operating on the site.~~

Include reason(s) for your submission point

Mercury opposes Policy 3b.2.9 for the same reasons it opposes Objective 3b.2.2.

Mercury is of the view that Policy 3b.2.9 is misguided and seeks to achieve the wrong outcome. Firstly, it presupposes that the established character of the General Rural Environment represents a good environmental outcome in all respects to the extent that it should be "maintained". Secondly, a policy that seeks to maintain the "established character" is essentially seeking no change.

The policy characterises the rural environment by matters such as "limited signage" whereas the existence of more than 21 large-scale renewable electricity generation activities is a far more significant and defining aspect of the General Rural Environment in the Taupō District.

The rural environment does experience significant vehicle movements, noise and light spill associated with primary production activities, renewable electricity generation and rural industry activities. Accordingly Mercury proposes some clause deletions to ensure the policy is realistic

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

Points: 68.22

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

Seek amendment

Amend Policy 3b.2.10 as follows:

Policy 3b.2.10 Residential units

Avoid the cumulative effects of rural lifestyle development by providing for these activities within the Rural Lifestyle Environment and otherwise limiting residential units within the General Rural Environment that:

- a) Increase the demand for community infrastructure and services
- b) Result in the inefficient use of land or loss of future flexibility for productive uses
- c) Erode the general rural character through its density, scale and location.
- d) Result in the potential to generate reverse sensitivity effects.
- e) Constrain the ability to access or utilise renewable energy resources.

Include reason(s) for your submission point

Mercury supports Policy 3b.2.10 but it needs to be expanded to address one of the most significant adverse effects that can arise as a result of residential units being established in the General Rural Environment, that being reverse sensitivity effects. The establishment of residential units should also not constrain the ability to access or utilise renewable energy resources (which are of national significance).

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

Points: 68.23

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

Seek amendment

Amend Policy 3b.2.12 as follows:

Policy 3b.2.12 Minor residential unit

Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and to ensure that the future availability of the rural land resource will not be compromised and to avoid the potential for reverse sensitivity effects

Include reason(s) for your submission point

It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.

A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment.

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

Points: 68.24

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

Seek amendment

Amend Policy 3b.2.13 as follows:

Policy 3b.2.13 Avoiding reverse sensitivity

Any ~~adverse effects generated by an new sensitive~~ activity must be located and managed ~~within the allotment~~ so as to avoid ~~adversely affecting reverse sensitivity effects on~~ permitted, ~~and~~ lawfully established and/or consented neighbouring activities.

Include reason(s) for your submission point

Mercury supports a policy in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects.

Mercury seeks an amendment to the policy for the same reasons set out in relation to the changes sought to Objective 3b.2.5.

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

Points: 68.25

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

Seek amendment

Amend Policy 3b.2.14 as follows:

Policy 3b.2.14 Commercial and industrial activity

Limit the scale of commercial and industrial activity (excluding renewable electricity generation activities) to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary production and other activities provided for within the General Rural Environment

Include reason(s) for your submission point

Because renewable electricity generation activities fall within the definition of industrial activities, they need to be excluded from the first part of the policy which seeks to limit commercial and industrial activities.

Mercury supports the intent of the policy, but it needs to be widened to cover other activities (including renewable electricity generation activities) that are provided for and anticipated in the General Rural Environment beyond just primary production.

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

Points: 68.26

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

Retain Policy 3b.2.15.

Include reason(s) for your submission point

Mercury supports Policy 3b.2.15 on the basis that it reinforces the intension that the General Rural Environment is for larger scale productive activities (rather than rural residential opportunities).

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

Points: 68.27

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

Delete Objective 3b.3.1 and replace it with the following:

Objective 3b.3.1 Enable Rural Residential Activities

Zone parts of the Rural Environment as Rural Lifestyle Environment to enable and provide for rural residential activities in appropriate locations where they will not give rise to reverse sensitivity effects on the surrounding General Rural Environment or Industrial Environments.

Include reason(s) for your submission point

This is an unexpected objective for the parts of the Rural Environment where a greater density of subdivision and development is anticipated and provided for. The objective should focus on enabling rural residential opportunities in appropriate locations (i.e. where they will not create reverse sensitivity effects on activities in the wider General Rural Environment or Industrial Environments).

If Rural Lifestyle Environment are proposed in inappropriate locations (and no decision is made to amend that situation), it forces Mercury (and other parties) to seek to amend the rules and performance standards within the Rural Lifestyle Environment as an alternative means to avoid the creation of reverse sensitivity effects. It is preferable that only appropriate locations are zoned Rural Lifestyle Environment whereby activities occurring within those zones do not need to be constrained by way of the rules and performance standards

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

Points: 68.28

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

Amend Objective 3b.3.2 as follows:

Objective 3b.3.2 Avoid reverse sensitivity

Adverse reverse sensitivity effects, **including conflict with on permitted, and** legally established **and/or consented** activities in neighbouring Environments, are avoided.

Include reason(s) for your submission point

Mercury supports an objective in the Rural Lifestyle Environment chapter that seeks to avoid reverse sensitivity effects. However, Mercury is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already exists. This is particularly concerning for Mercury. The objective needs to also cover consented activities which have yet to be constructed / undertaken.

Mercury's geothermal generation activities, which do and are anticipated to occur in the District's General Rural Environment (as identified in the introductory text to this chapter and Strategic Directions chapter).

From time-to-time new wells and pipelines will be required to establish to support the on-going operation of its geothermal generation plants.

This objective and policy framework could allow housing to proliferation of new houses to establish in areas of the rural environment because there are few if any rural production activities operating.

Reverse sensitivity is an issue for Mercury. The introduction of new sensitive activities into the rural environment where rural production and renewable electricity generation exist has the potential to create complaint as the two are incompatible.

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

Points: 68.29

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

Seek amendment

Amend Objective 3b.3.3 as follows:

Objective 3b.3.3 Commercial and industrial activities

The establishment of commercial and industrial activities that have no functional need to locate and are incompatible with the rural residential activities occurring within the [Rural Lifestyle](#) Environment are avoided.

Include reason(s) for your submission point

Mercury supports Objective 3b.3.3 but it needs to be more precisely drafted for accuracy and clarity.

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

Points: 68.30

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

Seek amendment

Retain Objective 3b.3.4.

Include reason(s) for your submission point

Mercury supports the consolidation of Rural Lifestyle activities within identified and appropriately located Rural Lifestyle Environments.

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

Points: 68.31

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

Seek amendment

Amend Objective 3b.3.6 as follows:

Objective 3b.2.6 Impacts on [community](#) infrastructure

The impacts ~~on community infrastructure~~ arising from subdivision and development [are managed do not compromise the safe and efficient functioning of infrastructure](#).

Include reason(s) for your submission point

An objective (or policy) that only seeks to “manage” something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupō District Plan.

The objective should apply to all infrastructure, not just community infrastructure.

These amendments are considered necessary so that there is a policy which achieves Objective 3b.3.2 (avoid reverse sensitivity).

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

Points: 68.32

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

Seek amendment

Add a new point i) to Policy 3b.3.9 as follows:

i) An environment that is surrounded by a working rural environment including rural production, geothermal areas and renewable electricity generation activities.

Include reason(s) for your submission point

Mercury supports Policy 3b.3.9 but it also needs to recognise, and not have adverse effects on, the nature of the surrounding General Rural Environment

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

Points: 68.33

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

Support

Retain Policy 3b.3.10

Include reason(s) for your submission point

Requiring larger lot sizes and greater building setbacks for new dwellings within the Rural Lifestyle Environment are two key methods for managing reverse sensitivity effects. Mercury therefore supports this policy on this basis.

However, Mercury reiterates that these two measures alone will not always avoid the potential for reverse sensitivity effects (which is what new Objective 3b.3.2 requires), and this needs to be reflected across several policies within this sub-chapter. See the relief sought in relation to other objectives and policies.

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

Points: 68.34

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

Seek amendment

Amend Policy 3b.3.12 as follows:

Policy 3b.3.12 Minor residential unit

Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, **and** to further protect the character of the ~~r~~Rural Lifestyle Environment ~~and to avoid reverse sensitivity effects.~~

Include reason(s) for your submission point

A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment.

It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.

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

Points: 68.35

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

Support

Retain Rule 4b.1.1.

Include reason(s) for your submission point

Mercury supports Rule 4b.1.1 on the basis that it is consistent with the approach throughout the rest of the Plan, is effects based, and enables activities to occur that do not need to be the subject of a resource consent application process.

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

Points: 68.36

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

Amend?

Seek amendment

Amend Rule 4b.1.2 as follows:

Add new matter of discretion as 4b.1.2(i) as follows:

- i. A minor residential unit which complies with the performance standards is a **permitted activity**.
- ii. A minor residential unit which does not comply with the performance standards is a **restricted discretionary activity**.

When considering activities under Rule 4b.1.2 Council restricts the exercise of its discretion to the following matters:

- a. The proximity between the primary residential unit and the minor residential unit.
- b. The extent to which the residential unit and vehicle access point design, siting and external appearance adversely affects rural character and amenity.
- c. 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.
- d. Effect on nearby sites, including outlook and privacy.
- e. Whether the residential unit and the vehicle access point can be more appropriately located to maintain, enhance or restore indigenous biodiversity values.
- f. The ability to **mitigate avoid** adverse effects, **including reverse sensitivity effects**, through the use of screening, planting, landscaping, **and** alternative design, **and/or other means including restrictive covenants**.
- g. Proposed methods for the avoidance, remedying or mitigation of potential adverse effects, and the degree to which they would be successful
- h. The likelihood of future subdivision which results in the minor residential unit being on a separate allotment to the primary residential unit.
- i. The potential to constrain access to and/or the utilisation of renewable energy sources.**

Include reason(s) for your submission point

Minor residential units are sensitive activities whereby their establishment needs to be controlled so as to not result in reverse sensitivity effects.

An additional criterion has been added to ensure that minor residential units do not constrain access to and/or the utilisation of renewable energy sources.

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

Points: 68.37

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

Amend?

Support

Retain Rule 4b.1.3.

Include reason(s) for your submission point

Mercury supports this rule.

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

Points: 68.38

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

Amend?

Seek amendment

Retain Rule 4b.1.4, and amend it as follows, including new clause (ii).

4b.1.4 Electricity Generation Core Sites, Renewable ~~Electricity~~ **Energy** Generation Activities and Geothermal Areas ~~Steamfields~~

i. Any activity involving continued operation, maintenance and minor upgrading of existing electricity generation core sites, geothermal areas ~~steamfield~~, renewable ~~energy~~ **electricity** generation activities and associated structures and ancillary activities is a **permitted activity**.

ii) Activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators are a permitted activity.

NOTE: For the purpose of this rule “maintenance” means:

All activities associated with the protective care, ~~and monitoring of a hydro dam, a geothermal or hydroelectric power station, geothermal steamfields and associated structures, in order to monitor~~, test and/or arrest the processes of decay, structural fatigue, erosion or dilapidation of all associated structures and includes maintenance of surrounds and water areas.

NOTE: For the purpose of this rule “minor upgrading” means:

Structural improvement, repair and replacement or upgrade of components, or activities required for the continued safe and efficient operation including worn or technically deficient parts of any structure including the powerhouse, hydro dams, separation plants, switchyards, intake, control and diversion structures, wells, pipes, tunnels, cables, other equipment and accessory buildings and structures ~~of similar character and scale~~, and includes associated drilling, vehicles, infrastructure, machinery, testing, monitoring, earthworks and vegetation removal. Also the extension to existing Buildings and Structures, and the erection of new Buildings and Structures. up to 100m² in area and not exceeding the maximum height standard for the Rural Environment and the erection of any aerial, antennae or communication dish not exceeding 5m² in area located on top of a hydro or geothermal existing structure, subject to compliance with the Noise Performance Standard.

Include reason(s) for your submission point

Mercury supports the retention of Rule 4b.1.4 (being a continuation of the Rule in currently in the Rural Environment) with a number of minor amendments. This is the enabling rule that appropriately provides for the operation, maintenance and minor upgrading of renewable electricity generation activities in the General Rural Environment.

The term “Geothermal Areas” has been used rather than “Geothermal Steamfields” due to Section O of the Plan identifying and mapping Geothermal Areas.

A second clause is requested to be added to the rule on the basis that Policy G of NPS-REG states:

“Regional policy statements and regional and district plans shall include objectives, policies, and methods (including rules within plans) to provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators.”

Activities of this nature tend to be temporary activity and any effects are easily remediated.

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

Points: 68.39

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

Seek amendment

Amend Rule 4b.1.5 as follows:

i. A commercial, industrial activity or home business which complies with the performance standards is a **permitted activity**.

ii. A commercial, industrial activity or home business which does not comply with the performance standards is a **restricted discretionary activity**.

When considering activities under Rule 4b.1.5*ii* Council restricts the exercise of its discretion to the following matters:

- a. The daily vehicle movements expected to and from the allotment.
- b. The effect of the activity on the rural character of the area, having regard to visual effects and lighting effects.
- c. The effect of the activity on surrounding land uses (including reverse sensitivity effects) and how these effects can be managed onsite and/or mitigated.
- d. The hours of operation for the activity.
- e. The proposed signage associated with the activity.

Include reason(s) for your submission point

Home businesses could include sensitive activities and need to avoid creating reverse sensitivity effects.

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

Points: 68.40

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

Seek amendment

Amend Rule 4b.1.7. as follows:

4b.1.7 Buildings and Structures in proximity to Hhigh voltage transmission lines

i. Any building or structure (except network utilities and Renewable Electricity Generation Activities) located within 0 – 12 meters of a high-voltage transmission line is a **restricted discretionary activity**.

Include reason(s) for your submission point

Mercury supports this rule as it seeks to ensure the safe operation of transmission lines, through the management of risk associated with structures in close proximity to high voltage infrastructure.

Electricity generation is not a network utilities, so needs an exclusion to avoid unnecessary consents.

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

Points: 68.41

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

Seek amendment

Retain Rule 4b.1.8 but amend the first exception to the rule as follows:

EXCEPTION: This rule will not apply to the erection of structures:

- a. Associated with existing renewable electricity generation activities including Wwithin Electricity Generation Core Sites.
- b. ...

Include reason(s) for your submission point

Mercury supports this exception as we agree that this RDA rule should not apply to structures within Electricity Generation Core Sites. However, there is no reason why this exception should not apply to all other existing renewable electricity generation activities

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

Points: 68.42

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

Seek amendment

Retain 4b.1.9 but amend the exception as follows:

EXCEPTION:

This rule will not apply to Earthworks associated with existing and consented renewable electricity generation activities including within Electricity Generation Core Sites

Include reason(s) for your submission point

Mercury supports this exception as we agree that this RDA rule should not apply to earthworks within Electricity Generation Core Sites. However, we consider that the exception should be extended to include other existing and consented renewable electricity generation activities.

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

Points: 68.43

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

Seek amendment

Retain 4b.2.1 but amend the exception as follows:

EXCEPTION:

This performance standard shall not apply to traffic movements involved in forest harvesting operations or existing and consented renewable electricity generation activities.

Include reason(s) for your submission point

Mercury supports Rule 4b.2.1 subject to the exception being expanded to include renewable electricity generation activities.

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

Points: 68.44

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

Seek amendment

Amend Rule 4b.2.5 as follows:

4b.2.5 Maximum building height

- i. 12 metres.
- ii. 5 meters in a height restricted area.
- iii. 5 meters in an Outstanding Landscape Area.

iv. 15 meters for renewable Electricity Generation activities on land identified as a Geothermal Area in Section O ~~within an Electricity Generation Core Site.~~

EXCEPTIONS:

- Activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators including wind monitoring masts – no height limit
- Cranes being used as part of any construction or maintenance works for the duration of the works – no height limit.
- Drilling Rigs for up to 60 days per well allotment – no height limit.

Include reason(s) for your submission point

Mercury seeks amendments to Rule 4b.2.5 to make the rule applicable to all renewable electricity generation activities within Geothermal Areas.

An additional exception has been added to the rule on the basis that Policy G of NPS-REG states:

“Regional policy statements and regional and district plans shall include objectives, policies, and methods (including rules within plans) to provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators.”

Activities of this nature tend to be temporary activity and any effects are easily remediated.

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

Points: 68.45

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

Seek amendment

Amend Rule 4b.2.6 as follows:

4b.2.6 Minimum building setbacks

- i. 30 metre setback for dwellings and minor residential units from the front boundary.
- ii. 15 metres from all other boundaries
- iii. 25 metres in Outstanding Landscape Areas from all boundaries.
- iv. 200 metres for buildings for the management of farmed animals from all boundaries.
- v. There shall be no front boundary setback for buildings and activities associated with ~~Electricity Generation~~ and Renewable ~~Energy~~ Electricity Generation Activities on land identified as Geothermal Area in Section O ~~within an Electricity Generation Core Site~~ where the road extends over any power generation Building or Structure.
- vi. There shall be no boundary setback for buildings and activities associated with Renewable Electricity Generation Activities on land identified as Geothermal Area in Section O including within an Electricity Generation Core Site

-

EXCEPTIONS:

- For the purpose of this performance standard water tanks are not required to comply with the setback requirements in this standard.

Include reason(s) for your submission point

Mercury seeks minor amendments to Rule 4b.2.6 to make it more accurate and workable.

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

Points: 68.45

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

Seek amendment

Amend Rule 4b.2.7 as follows and to add a new clause (c):

4b.2.7 Minor residential units

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

- i. All minor residential units or accommodation activity units shall:
 - a. Be no larger than 100m² in size
 - b. Be located no greater than 20 metres from the primary residential unit.
 - c. Be located no closer than the existing primary residential unit on the same site to a Consent Area which is the subject of resource consents issued by the Waikato Regional Council for the take or discharge of geothermal fluid exceeding 1,000 tonnes per day provided that this clause shall not apply to properties more that 300m away from any aforementioned Consent Area.

e.d. Share an accessway/driveway with the primary residential unit.

EXCEPTION:

Papakāinga

NOTE:

Minor residential units also include accommodation activities, tiny homes/houses, caravans and other structures used for accommodation for more than two consecutive months in a calendar year on the allotment.

Include reason(s) for your submission point

Minor residential units need to be located so that they do not create additional restrictions on renewable electricity generation activities by, for example, moving a point of noise compliance closer to the source of noise.

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

Points: 68.47

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

Amend?

Seek amendment

Amend Rule 4b.2.8 by including a new clause (iii) as below:

4b.2.8 Commercial and industrial activities, and home businesses

i. Any indoor or outdoor space used for commercial, industrial or home business purposes, shall have a gross floor area less than 100m² for indoor activities, or 100m² of land area for outdoor activities.

ii. For home businesses the principal operator of the home business must be a permanent resident on the site to which the home business relates.

iii. Home businesses shall be located no closer than the existing primary residential unit on the same site to a Consent Area which is the subject of resource consents issued by the Waikato Regional Council for the take or discharge of geothermal fluid exceeding 1,000 tonnes per day provided that this clause shall not apply to properties more than 300m away from any aforementioned Consent Area.

EXCEPTION:

Home business or commercial activities within a Papakāinga.

Include reason(s) for your submission point

Home businesses need to be located so that they do not create additional restrictions on renewable electricity generation activities.

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

Points: 68.48

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

Amend?

Seek amendment

Amend Rule 4b.2.13 as follows:

4b.2.13 Maximum Noise – Other

i. Nothing in the foregoing Performance Standards shall apply to farm animals including working dogs, and to agricultural and forestry vehicles, agricultural and forestry machinery or equipment (including mobile plant at produce packing facilities but excluding sawmilling equipment), operated and maintained in accordance with the manufacturer's specifications in accordance with accepted management practices (e.g. for milking, spraying, harvesting, packing, forest harvesting and the like). Provided that the activity shall comply with the requirements of S16 of the Resource Management Act 1991

ii. Nothing in the foregoing Performance Standards shall apply to sirens, circuit breakers, **bursting discs, emergency or upset operating conditions** and hydro spills associated with the operation of **Renewable Electricity Generation Activities Core-sites**. Provided that the activity shall comply with the requirements of S16 of the Resource Management Act 1991.

Include reason(s) for your submission point

Mercury supports this rule subject to minor amendments to ensure it applies to all applicable circumstances.

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

Points: 68.49

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

Retain Rule 4b.2.15.

Include reason(s) for your submission point

Mercury supports this rule.

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

Points: 68.50

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

Retain Rule 4b.5.1 subject to an additional matter of control as set out in Rule 4b.5.3 (as per the relief below).

Include reason(s) for your submission point

Mercury supports this rule subject to an additional matter of control as set out in Rule 4b.5.3 (as per the relief below).

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

Points: 68.51

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

Amend Rule 4b.5.3 to include an additional matter of control as 4b.5.3(i) as follows:

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**.

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:

- a) 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 management of stormwater.
- 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.
- c) 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.
- d) The extent to which earthworks and vegetation removal is required to create vehicle tracks and building platforms.
- e) Any actual or potential effects on areas or features of cultural, historic, landscape or natural value as identified in the plan.
- f) The imposition of conditions in accordance with Sections 108 and 220 of the Resource Management Act 1991.
- g) Any potential adverse effects from Natural Hazards, including flood inundation or erosion from the District's waterways and Lakes.
- h) 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.

i) Any effects on the functioning of the Rural Environment including adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources.

Include reason(s) for your submission point

Mercury supports the inclusion of an additional matter over which control is reserved for controlled activities.

The matters of control need to refer to renewable electricity generation activities and renewable energy resources as they are located in the existing Rural Environment

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

Points: 68.52

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

Support

Retain Rule 4b.5.4.

Include reason(s) for your submission point

Mercury supports this rule.

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

Points: 68.53

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

Support

Retain Rule 4b.5.5

Include reason(s) for your submission point

Mercury supports this rule.

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

Points: 68.54

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

Support

Retain Rule 4b.5.5.

Include reason(s) for your submission point

Mercury supports this rule.

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

Points: 68.55

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

Support

Retain Rule 4b.5.7.

Include reason(s) for your submission point

Mercury supports this rule.

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

Points: 68.56

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

**Amend?
Support**

Retain Rule 4b.5.8.

Include reason(s) for your submission point

Mercury supports this rule.

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

Points: 68.57

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

**Amend?
Support**

Retain Rule 4b.5.9.

Include reason(s) for your submission point

Mercury supports this rule.

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

Points: 68.58

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

**Amend?
Seek amendment**

Amend rule 4e.2.1 as follows:

4e.2.1 Foreshore Protection

Any building on or above ground within a Foreshore Protection Area is a discretionary activity.

- i. EXCEPTION: Electricity Generation Core Sites (as identified on the planning maps) – permitted activity where in accordance with Rule ~~4b.2.4~~ 4e.2.1 and where located no more than 100 metres from any existing structure associated with power generation.

Include reason(s) for your submission point

As a consequential change to the relief sought rule 4e.2.1 Foreshore Protection, must be edited to remove the reference to rule 4b.2.4 which no longer relates. Rule 4e.2.1 Foreshore Protection, must be edited to refer to rule 4b.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Areas

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

Points: 68.59

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

**Amend?
Support**

Retain 4b.2.9

Include reason(s) for your submission point

Mercury supports this rule

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

Points: 68.60

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

Retain 4b.2.10

Include reason(s) for your submission point
 Mercury supports this rule.

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

Points: 68.61

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

Retain 4b.2.11

Include reason(s) for your submission point
 Mercury supports this rule.

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

Points: 68.62

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

Retain 4b.2.12

Include reason(s) for your submission point
 Mercury supports this rule

Attached Documents

File
Mercury Submission Taupo DP PPC42
Mercury - Submission on PC42 - Final- 8 Dec 2022



Taupo District Council

Via email: hsamuel@taupo.govt.nz

Comments on Draft Taupo District Plan Strategic Issues and Rural Environment.

Mercury NZ Limited (Mercury) welcomes the opportunity to provide submissions on Plan Change 42 (General Rural and Rural Lifestyle Environments) and Plan Change 38 (Strategic Directions) to the Taupo District Plan. Working in the electricity supply sector, we recognise and fully support the urgent need to take bold action to achieve Aotearoa New Zealand's goals of reducing net GHG emissions to 50% below gross 2005 levels by 2030 and to reach net zero carbon emissions by 2050¹. The Taupo District is well positioned to play a significant role in New Zealand's successful transition to a low carbon economy, through the generation and delivery of secure, affordable and low carbon electricity to decarbonise home heating, transport and industry.

Taupo is strategically located within the central North Island, which has abundant electricity infrastructure. There are 21 existing electricity generation facilities within the District, as well as strategically located distribution and transmission infrastructure, which also needs to be used efficiently. It is highly likely that if New Zealand is to meet its climate change obligations, **significant expansion of existing electricity generation plant as well as new electricity generation facilities will be required to be built within the Taupo District in the short term**. The utilisation and optimisation of existing infrastructure, such as the national grid and relevant distribution infrastructure is also essential to ensure increased electricity output and efficiency gains can be achieved. It is for this reason, the explicit recognition of the use and development of renewable energy resources is needed within the District Plan, which is a primary regulatory tool. From Mercury's perspective more emphasis is needed within the District Plan to assist with decarbonisation, which is of critical importance to New Zealand. As the current operative District Plan has no dedicated Energy chapter, the Rural Zone chapter is the "default" chapter for energy sector provisions that address electricity infrastructure located within the rural environment.

The notified version of the two Plan Changes falls well short of the decarbonisation outcomes needed. Mercury has worked with other generators Contact, Genesis and Manawa to draft collective relief, to ensure the Taupo District Plan framework can provide for the following necessary decarbonisation outcomes relating to the use and development of renewable energy;

1. Provide an enabling framework for the use and development of renewable energy, whilst supporting the broader functioning of the general rural environment;
 - a. Objectives and Policies within the Climate Change (section 2.4) and Infrastructure (section 2.5) sections of the Strategic Directions chapter, which are relevant from a generation development perspective, this includes upgrading, in response to a changing environment.
 - b. Policies, rules and relevant standards within the General Rural Environment to provide for the implementation and regulation of land uses, which the majority of renewable electricity generation facilities and activities, which are located within the General Rural Environment.
 - c. Provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation within the General Rural Environment as a permitted activity e.g. wind monitoring masts and associated activities.
 - d. The framework should achieve a reduction of Green House Gas (GHG) emissions from the end use of energy, including associated with home heating, transport and industrial process heat. This relates to broader land use management policy outcomes for the end use of energy, such as providing for EV charging in public locations within the Rural Environment as a permitted activity.
2. Continue to provide for the maintenance and minor upgrading of existing REG activities under a permissive rule framework, which include;

¹ [Greenhouse gas emissions targets and reporting | Ministry for the Environment](#)



- a. Providing for (i.e. not encumbering) the efficient, safe adaptation of assets owned by lifeline utilities to mitigate identified risks from climate change e.g. civil and structural alterations to hydro assets in response to high flow and/or extreme weather events;
- b. Enabling increased REG output from existing generation sites, to increase New Zealand's electricity generation capacity, noting that electricity demand will significantly increase over time as transport and process industrial heat is electrified and supply must always meet demand.
- c. Protect renewable energy resources from reverse sensitivity conflicts, including for example, anticipated use of geothermal steam fields from lifestyle subdivision.

Mercury's interests in the Taupo District

Mercury is a Lifeline Utility infrastructure owner with electricity generation assets and activities within the Taupo District. Mercury is a vertically integrated generator and retailer of electricity throughout New Zealand. Mercury generates all its electricity from 100% renewable energy sources (hydro, geothermal and wind).

Mercury owns and operates the Waikato Hydro Scheme (WHS) which consists of eight dams and nine power stations on the Waikato River. The nine power stations have a total electricity generating capacity of approximately 1050MW and harness the power of water via the force of gravity. Critical infrastructure located within the Taupo District includes: Lake Taupo and the Taupo Control Gates, the Aratiatia, Ohakuri, Atiamuri, Whakamaru, Maraetai II, and Maraetai I (Left abutment/half of Dam) power stations – all of which are located within the General Rural Environment. WHS generation output is highly influenced by inflows into Lake Taupo and 20% of those inflows are derived from the Tongariro Power Scheme. Currently Lake Taupo storage range is limited to 1.4m and annual rainfall and snowmelt exceed this storage capacity resulting in water cycling through the lake 5-6 times a year. The ongoing maintenance and potential upgrade to ensure all infrastructure is able to be resilient to the effects from climate change is essential.

Mercury also owns and/or operates four geothermal power stations (Rotokawa, Nga Awa Purua, Ngatamariki and Mokai) in the Taupo District with a total net capacity of approximately 370 MW. These geothermal power stations provide baseload electricity that is not subject to climatic constraints, which complements the variable (peaking) from generation on the Waikato Hydro Scheme. With the exception of the Rotokawa power station, which is zoned industrial, all other power stations and geothermal area and activities are located within the General Rural Environment. Rotokawa geothermal power station is located within a fragmented industrial zone, surrounded by the General Rural Environment. The power station is connected to the National Grid via local distribution lines.

Mercury has REG (mainly wind) development interests within the district located within the General Rural Environment. To support development of these interests, a temporary activity such as erecting wind monitoring masts (which are needed to collect data on wind resources), should be enabled within the Rural Environment.

Addressing impacts of Climate Change will necessitate Adaptation, Mitigation, and Upgrading – all of which must be enabled.

The serious implications of climate change have been acknowledged by New Zealand in its ratification of the UNFCCC and the Paris Agreement, in government policy and in legislation. New Zealand has accepted the IPCC science and, pursuant to the Paris Agreement, has submitted a Nationally Determined Contribution to reduce net GHG emissions to 50% below gross 2005 levels by 2030.

Mercury seeks that Chapter 2 (Strategic Directions), and in particular section 2.4 (Climate Change), will drive all decarbonisation outcomes through a clear enabling framework, including Objectives and Policies which explicitly acknowledge the use and development of renewable energy resources, as well as the end use of energy which is fundamental to a successful transition for New Zealand. To put decarbonisation into perspective, if New Zealand is to meet its climate change (i.e. emission reduction) obligations (as noted in the first paragraph above), **approximately 70% more electricity supply from renewable resources will be necessary by 2050** to meet the increased demand from the electrification of transport, home heating and the conversion of industrial process heat from fossil based fuels to electricity. This is the scale of the very real challenge ahead.



Renewable energy projects are key to early GHG emission reductions needed to meet these commitments because the technology is mature, they are cost-effective and they are relatively politically palatable.² The effects of renewable energy projects are also readily understood.³ For New Zealand renewable energy is particularly critical because of the difficulties in addressing agricultural emissions and the country's intended reliance on electrification to replace fossil fuels in key areas (e.g. transport, industry and heating).

Climate Change – Safe Adaptation to a Changing Environment

Mercury considers the concepts of land use and risk are poorly articulated from a climate perspective, which is primarily relevant to “Effects of Climate Change” as noted Section 2.4. As the climate becomes more volatile, communities will potentially be exposed to increased or even intolerable risks, resulting in sub-optimal social, economic and cultural outcomes.

There are operational challenges associated with managing the effects of climate change, such as a warmer climate reducing the efficiency of geothermal generation, and/or managing more volatile hydrology from changing weather patterns. Lost generation output or system capacity will need to be replaced elsewhere in the electricity system, as supply must always meet demand if the lights are to stay on. It is expected there will be greater variability in weather events, more intense storms (which lead to high inflow events) as well as longer more extreme droughts, all of which create significant operational challenges for hydro power station owners.

The Waikato Hydro System can attenuate some (but not all) high flow events, as there is limited storage capacity in Lake Taupo and in the hydro lakes. The Waikato Hydro System also provides benefits for the wider community by ensuring water security during periods of low inflows. The Waikato Hydro Scheme is essentially a ‘run of river’ system but the dams along the river provide the ability to attenuate flows for the benefit of Waikato communities once the water is released from Lake Taupo. e.g. water supply resilience for all water uses such as municipal, rural and recreational activities, as well as geothermal activities (which are reliant upon water supply for cooling and drilling activities). There are also interdependencies between lifeline utilities that adaptation needs to be cognisant of.

Failure to adapt, or adequately manage risk could have significant consequences, including on the health and safety of people and their communities, and less reliability of lifeline utilities if operational thresholds/requirements are compromised. Adapting to manage the potential impacts from a more volatile environment is an important tool to successfully mitigate potential effects to an acceptable risk threshold. It is anticipated major upgrades will be required to the Taupo Control Gate structures (which dictates how much water flows down the Waikato River from Lake Taupo) and to spillways on dam structures to allow for **safe passage of water during high flow events**.

Strong consideration needs to be given to objectives and policies within Section 2.4 (Climate Change) to ensure sufficient consideration is given to this issue, as well as enabling permissive rules in direct response to adaptive requirements.

Operational Efficiency and Increasing Electricity Output from Existing Infrastructure Critical to Decarbonisation.

Renewable electricity generation activities need the ability to maximise generation output from existing sites and improve operational efficiencies if decarbonisation outcomes are to be realised and agreed targets reached. Mercury seeks exclusions from building footprint and setback requirements within all existing sites for structures within the General Rural Environment. This provides for greater ability to maintain and upgrade activities, which will be essential if the sector is to achieve decarbonisation outcomes.

Mercury supports the operative provisions which provide permissive rules enabling “maintenance and “minor upgrading” to all existing renewable electricity generation activities, rather than just EGCS's. However, further exemptions from building setbacks, SNAs, ONLs on existing sites are needed if an effective framework is to be provided. We note that future REG development will be subject to consent processes, so there will still be a mechanism to assess development effects against competing values. These changes are justified by increasing efficiencies and output which assist decarbonisation.

² As discussed by the IPCC and summarised below.

³ See eg NZS6808:2010 in relation to noise generated from wind turbines.



Rural Character

The General Rural Environment framework as notified lacks clarity and does not acknowledge the importance of renewable electricity generation activities as an appropriate activity within the context of the General Rural Environment. The use and context of the term "Rural Character" as notified is problematic. There is insufficient acknowledgement of working structures, effects and activities associated with renewable electricity generation activities and existence of energy resources, all of which are prevalent in the rural environment. Hydro dams, geothermal areas and activities such as power stations, drill rigs and geothermal pipelines are all working components of General Rural Environment. Looking forward to New Zealand's transition to a low carbon economy, wind farms, solar farms and battery storage systems are anticipated to occupy the General Rural Zone as well. There are also electricity distribution and transmission activities and structures, as well as industrial zoned renewable electricity generation facilities surrounded by the rural environment. It is not always reasonable to reduce effects to within site boundaries.

Electricity generation needs to be excluded from the definition of "rural industry", which is problematic from an implementation perspective. The generator group seeks to ensure rural character is well considered and recognises structures, effects and activities associated with development and use of renewable energy resources, which has a functional need to be located where energy resources exist. These outcomes coupled with recognition of functional need with policy, recognises the practical constraints associated with the use and development of renewable energy as provided for in the NPS-REG.

Functional Need to Locate Where Energy Resources are Located

Existing renewable electricity generation activities and future use and development have a functional need to exist where renewable energy resources are located.

Utilisation of energy resources needs to be protected from inappropriate sensitive land uses that could limit future use, or access. Activities within the General Rural Environment need to be cognisant of anticipated effects (odour, noise, visual effects (steam, light) subsidence) from the utilisation of renewable energy resources and existing renewable generation activities. The provision of lifestyle subdivision if not well planned around existing clusters within the Rural Environment could limit utilisation of geothermal energy, which will create future reverse sensitivity effects by constraining access to geothermal energy. Mercury seek changes to ensure the policy framework manages reverse sensitivity, and mechanisms to manage sensitive uses near renewable energy resources.

I would be happy to discuss any aspect of our submission with Council.

Yours sincerely



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ATTACHMENT A

Submissions on Proposed Change 42 to the Taupō District Plan - General Rural and Rural Lifestyle Environments

Plan Section / Provision	Support / Oppose	Relief sought	Reasons for Submission
Section 10: Definitions			
Rural Industry and new definition	Oppose	<p>Amend the definition of Rural Industry as follows.</p> <p>Rural Industry – 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>Insert a new definition of Renewable Electricity Generation as follows (being the same definition in the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG):</p> <p><u>Renewable electricity generation means generation of electricity from solar, wind, hydro-electricity, geothermal, biomass, tidal, wave, or ocean current energy sources.</u></p>	<p>Mercury opposes the inclusion of “geothermal / electricity generation” within the definition of Rural Industry.</p> <p>Renewable electricity generation is an activity that has been recognised in the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG) as a matter of national significance. Renewable electricity generation is also an activity identified in the Waikato and Bay of Plenty Regional Policy Statements (RPS) as a Regionally Significant Infrastructure. It is therefore inappropriate to treat the activity of Renewable Electricity Generation as part of, and in the same manner as, other activities that occur in the rural environment such as forestry, agriculture and dairy farming. The elevated status and importance of Renewable Electricity</p> <p>Mercury opposes the inclusion of Renewable Electricity Generation activities within the definition of ‘Rural Industry’. The 21 power generation facilities within the existing rural environment in the Taupo District are located there, as there is a functional need to be located where energy resources exist. They are not simply a ‘Rural Industry’ because they are located in a ‘Rural Environment’, they are ‘Renewable Electricity Generation’ activities located in the ‘Rural Environment’.</p> <p>In addition to the above primary reason, the notified definition also does not work because of its sentence structure. Specifically, the use of the word “and” in the first sentence of the definition (shown in bold below) means that to meet the definition an activity has to be dependent on primary production – which electricity generation clearly is not. Even though the second sentence of definition carries on to state that these activities “include” and geothermal/electricity generation, the second sentence effectively contradicts the first sentence.</p> <p>Rural Industry – 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>The easiest way to resolve the above sentence structure issue, and also address the more fundamental points about the national significance of REG activities, is to separate the definitions as requested in this submission point and the one that follows.</p>

Plan Section / Provision	Support / Oppose	Relief sought	Reasons for Submission
New definitions	Oppose	<p>Insert a new definition for Renewable Electricity Generation activities as follows.</p> <p><u>Renewable Electricity Generation activities means the construction, operation and maintenance of structures associated with renewable electricity generation. This includes small and community-scale distributed renewable generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.</u></p> <p>Insert a new definition for Reverse Sensitivity as follows:</p> <p><u>Reverse sensitivity is the vulnerability of a lawfully established activity to a new activity or land use. It arises when a lawfully established activity causes potential, actual or perceived adverse environmental effects on the new activity, to a point where the new activity may seek to restrict the operation or require mitigation of the effects of the established activity.</u></p>	<p>Due to the nature of the following submissions by Mercury, two additional definitions need to be included in the Taupō District Plan.</p> <p>The proposed new definition of Renewable Electricity Generation activities, is the same definition as in the NPS-REG.</p> <p>The proposed new definition of Reverse Sensitivity is the same definition as in the Waikato RPS.</p>
3b.1: Rural Environment Chapter – Introduction			
3b.1 Introduction	Support with amendment	<p>Amend the Introduction to Chapter 3b.1 as follows:</p> <p><i>3b.1 Introduction</i></p> <p>The Rural Environment makes up most of the land within the District and has been categorised into two distinct areas, being the General Rural Environment and the Rural Lifestyle Environment. These separate areas highlight the increasing need to protect the open space characteristics of the Rural Environment and its production values, while also providing for the growth of the District and the demand for rural lifestyle living in specific locations.</p> <p>The Rural Environment also contains sites that are of significance, some of these are identified as Outstanding Landscape Areas. The Rural Environment objectives and policies seek to manage subdivision and land use activities in a way that reflects the productive nature of the land, the rural level of infrastructural services and the amenity values of the landscape, as well as managing effects and enabling rural lifestyle living in appropriate areas. Other activities that are anticipated in the Rural Environment are tourism activities, visitor accommodation and renewable electricity generation and transmission. It is important that all such activities do not affect the ability of the rural environment to function effectively. It is also important to acknowledge that existing, lawfully established activities in the Rural Environment are able to continue operating and that activities that choose to locate in close proximity to these activities are aware of the effects they can generate and that the Rural Environment is the best location for these activities. It is expected in the Rural Environment that all properties are self-servicing in terms of the provision of potable water and the disposal of stormwater and wastewater.</p> <p>The papakāinga provisions recognise the intent of Part 2 of the RMA and provide for the occupation by whanau, hapū or iwi members on Māori land. The provisions recognise the importance of enabling Māori to settle on their ancestral lands. Papakāinga development will often be at higher densities than other residential land uses in the rural environment. Papakāinga may also have associated social, cultural or commercial aspects to support the community who reside there.</p> <p>In addition to papakāinga there is a wide range of cultural activities and activities of importance to Māori which are appropriate to occur within the rural environment.</p> <p>General Rural Environment</p>	<p>The introductory statement to Chapter 3b provides context about the nature and character of the District’s rural environment, and the activities that are anticipated to occur within it.</p> <p>Mercury generally supports the introductory statement but seeks minor changes to recognise the importance and functional need for renewable electricity generation to occur within the Rural Environment, its contribution to the regional economy and New Zealand’s security of electricity supply.</p> <p>These changes also reflect the need to ensure that renewable electricity generation activities are protected from potential reverse sensitivity effects (such as housing, visitor accommodation and lifestyle development both within the General Rural Environment and the new Rural Lifestyle Environment), and that if sensitive and incompatible activities do establish, they do not constrain the ability of renewable electricity generation activities to continue operating efficiently and effectively.</p> <p>Mercury supports the statement about creating Rural Lifestyle Environments “<i>in appropriate locations within the Rural Environment</i>”.</p> <p>Mercury also supports the statement: “<i>By concentrating rural residential development within the Rural Lifestyle Environment this serves to preserve the open space characteristics and productive potential of the rest of the Rural Environment, and to reduce the potential for land use conflict.</i>”.</p>

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		<p>The General Rural Environment is predominantly characterised by large open space and vegetated areas including productive farmland and forest, ridgelines, native bush, lakes, rivers and their margins. Other prime characteristics of the General Rural Environment are the diverse range of land uses including farming, horticulture, energy <u>sources</u> and plantation forestry activities, with dispersed buildings and rural roads. There is also a wide range of development associated with tourism activities, recreation, and the District is one of New Zealand's most significant for the generation, storage and transmission of renewable electricity.</p> <p>The purpose of separating the General Rural Environment from the Rural Lifestyle Environment is to preserve the productive potential of the land <u>and other natural resources</u> within the General Rural Environment by retaining large property sizes and limiting the extent of housing provided for, yet allowing appropriate development to occur while preserving the rural character of the General Rural Environment. The creation of the General Rural Environment aims to support primary productive uses, <u>renewable electricity generation activities</u>, and rural industry, meaning an activity being activities that directly supports, services, or is are dependent on primary production and/or have a locational <u>or functional</u> need to be within the General Rural Environment (rather than an urban environment).</p> <p>Primary production a Activities in the General Rural Environment will produce effects that are different from urban areas, such as noise, odour, vibration, spray drift and dust. Allowing these activities to operate in a more suitable environment, along with compatible activities, aims to protect rural land uses from unnecessary restrictions.</p> <p>The General Rural Environment provisions seek to limit the scale of commercial and industrial activities unless they are dependent on primary production and/or have a locational functional or operational need to be within the General Rural Environment. This is to avoid the uptake of General Rural Environment land by activities which are provided for in other Environments and may therefore impact on the land available for primary production activities within the General Rural Environment.</p> <p>Rural Lifestyle Environment</p> <p>The Rural Lifestyle Environment has been created to address the increasing demand for rural lifestyle living within the Rural Environment. The Rural Lifestyle Environment aims to provide for rural residential development in specific locations for those who want the benefits of rural living without necessarily undertaking a productive rural activity.</p> <p>By creating separate areas in appropriate locations within the Rural Environment, the Rural Lifestyle Environment creates areas for rural living on smaller property sizes, whilst retaining separation from the rural production <u>and other</u> activities predominating in the General Rural Environment. This separation of activities serves to minimise reverse sensitivity issues. By concentrating rural residential development within the Rural Lifestyle Environment this serves to preserve the open space characteristics <u>rural character</u> and the productive potential of the rest of the Rural Environment, and to reduce the potential for land use conflict.</p> <p>The Rural Lifestyle Environment will be less populated than a Residential Environment, with standards in place for minimum lot sizes to preserve the rural residential aspect of the area. Limited provision is also made for home business and commercial activity to occur, but not of a scale or extent that changes the predominantly rural residential amenity and character intended. The Rural Lifestyle Environment areas are located <u>closer in proximity</u> to urban areas to allow for access to community facilities within the district's townships.</p>	
3b.2 Objectives and Policies – General Rural Environment			

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Objective 3b.2.1	Support in part	Retain Objective 3b.2.1 with amendments. Objective 3b.2.1 Enable Primary Production <u>and the Use of Natural Resources</u> Primary production <u>and the use of natural resources</u> are enabled by protecting the availability of the rural land <u>and other</u> resources and its <u>their</u> productive capability.	Mercury supports Objective 3b.2.1 with an amendment so that it covers a wider range of uses anticipated in the General Rural Environment beyond just “primary production”. In accordance with s75(3) of the RMA District objectives and policies must give effect to existing RPS objectives and policies. Objective IM-02 in the Waikato RPS is ‘Resource Use and Development’. One of the policies which achieves Objective IM-02 is IM-P4 ‘Regionally Significant Industry and Primary Production’. The suggested amendments give effect to the Waikato RPS.
Objective 3b.2.2	Oppose	Amend Objective 3b.2.2 to read: Objective 3b.2.2 Maintaining the established General Rural character The established character of the General Rural Environment is maintained and the cumulative erosion of its character through incremental subdivision and development is avoided. <u>Enable a range of activities in the General Rural Environment that are compatible with rural character.</u>	Mercury is of the view that Objective 3b.2.2 is misguided and seeks to achieve the wrong outcome. Firstly, it presupposes that the established character of the General Rural Environment represents a good environmental outcome in all respects to the extent that it should be “maintained”. Secondly, an objective that seeks to maintain the “established character” is essentially seeking no change. The objective seeks to <u>avoid</u> “incremental subdivision and development” which essentially locks in the status quo and will make it difficult for any new development to occur, including new development that has been identified in other planning provision as being appropriately located in the General Rural Environment. As an example, a new geothermal power station will definitely change the character of the part of the General Rural Environment in which it is proposed and ultimately constructed which is an outcome contrary to Objective 3b.2.2. The same applies for other forms of development such as the construction and operation of a dairy shed. The wording of some of the existing planning provisions in the Rural Environment have been proposed as alternative wording for Objective 3b.2.2. The relief sought focuses on the use of “rural character” which scope of activities, affect and structure are outlined in the amended Policy 3.b.2.9 below.
Objective 3b.2.3 Rural Industry Requested new Objective 3.b.2.X	Support in part	Retain Objective 3b.2.3. Insert a new objective following Objective 3b.2.3 as follows: Objective 3b.2.X Renewable Electricity Generation and Transmission Activities <u>Enable the development, operation, maintenance and upgrading of renewable electricity generation activities and transmission activities in the General Rural Environment.</u>	Due to its elevated status under the NPS-REG, Mercury’s earlier submission point (above) seeks that the definition of Rural Industry be amended to delete any reference to electricity generation and that a new definition of Renewable Electricity Generation and Renewable Electricity Generation Activities be included in the Plan. Consistent with that request, and for the same reasons, , a new objective needs to be included in the Plan to enable renewable electricity generation activities (and transmission activities by association).
Objective 3b.2.4 Other activities	Oppose in part	Provided that new Objective 3b.2.X is added as requested above, amend Objective 3b.2.4 as follows: Objective 3b.2.4 Other activities Māori cultural activities, tourism activities, <u>and</u> visitor accommodation and renewable electricity generation and transmission activities are enabled in <u>appropriate locations within</u> the General Rural Environment.	As a consequential change to the relief sought above (inserting a new objective in relation to renewable electricity generation activities), Objective 3b.2.4 needs to be amended to remove the reference to renewable electricity generation (and transmission by association). Visitor accommodation is a sensitive activity and should only be enabled in appropriate locations within the General Rural Environment rather that enabled anywhere including in locations whereby reverse sensitivities could arise.
Objective 3b.2.5 Avoidance of reverse sensitivity	Support in part	Amend Objective 3b.2.5 as follows: Objective 3b.2.5 Avoidance of reverse sensitivity Reverse sensitivity effects on permitted, <u>and</u> legally established, <u>and/or consented</u> activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided.	Mercury supports an objective in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects. However, Mercury is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already <i>exists</i> . This is particularly concerning for Mercury. The objective needs to also cover consented activities which have yet to be constructed / undertaken. Mercury’s geothermal generation activities occur in the District’s General Rural Environment (as identified in the introductory text to this chapter and Strategic Directions chapter). From time-to-time new wells and pipelines will be required to establish to support the on-going operation of its geothermal generation plants.

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			<p>This objective and policy framework could allow a proliferation of new houses to establish in areas of the rural environment because there are few if any rural production activities operating.</p> <p>Reverse sensitivity is an issue for Mercury. The introduction of new sensitive activities into the rural environment where rural production and renewable electricity generation exist has the potential to create complaints as the two are incompatible.</p>
Objective 3b.2.6 Impacts on infrastructure	Oppose	<p>Amend Objective 3b.2.6 as follows:</p> <p>Objective 3b.2.6 Impacts on infrastructure</p> <p>The impacts on infrastructure arising from subdivision and development are managed <u>do not compromise the safe and efficient functioning of infrastructure</u>.</p>	<p>An objective (or policy) that only seeks to “manage” something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupō District Plan.</p>
Policy 3b.2.9 Maintaining the established character	Oppose	<p>Amend Policy 3b.2.9 as follows:</p> <p>Policy 3b.2.9 Maintaining the established Rural character</p> <p>Enable activities in the Maintain the established General Rural Environment <u>that will not compromise the character of the General Rural Environment</u>, as defined by:</p> <p><u>a) Extensive pastoral farming and forestry</u></p> <p><u>b) Renewable Electricity Generation Activities</u></p> <p><u>c) Geothermal areas and activities, electricity transmission and distribution</u></p> <p>ad) Large open spaces between built structures</p> <p>be) A mix of residential and rural industry buildings</p> <p>c) Noises related to production activities during the day but low levels of noise at night</p> <p>d) Low levels of light spill</p> <p><u>f) Effects from activities including noise, vibration, dust, odour and visual effects</u></p> <p>eg) Infrequent vehicle movements to and from a site</p> <p><u>fh) Limited signage that directly relates to the activity operating on the site.</u></p>	<p>Mercury opposes Policy 3b.2.9 for the same reasons it opposes Objective 3b.2.2.</p> <p>Mercury is of the view that Policy 3b.2.9 is misguided and seeks to achieve the wrong outcome. Firstly, it presupposes that the established character of the General Rural Environment represents a good environmental outcome in all respects to the extent that it should be “maintained”. Secondly, a policy that seeks to maintain the “established character” is essentially seeking no change.</p> <p>The policy characterises the rural environment by matters such as “limited signage” whereas the existence of more than 21 large-scale renewable electricity generation activities is a far more significant and defining aspect of the General Rural Environment in the Taupō District.</p> <p>The rural environment does experience significant vehicle movements, noise and light spill associated with primary production activities, renewable electricity generation and rural industry activities. Accordingly Mercury proposes some clause deletions to ensure the policy is realistic.</p>
Policy 3b.2.10 Residential units	Support in part	<p>Amend Policy 3b.2.10 as follows:</p> <p>Policy 3b.2.10 Residential units</p> <p>Avoid the cumulative effects of rural lifestyle development by <u>providing for these activities within the Rural Lifestyle Environment and otherwise</u> limiting residential units <u>within the General Rural Environment</u> that:</p> <p>a) Increase the demand for community infrastructure and services</p> <p>b) Result in the inefficient use of land or loss of future flexibility for productive uses</p> <p>c) Erode the general rural character through its density, scale and location-</p> <p><u>d) Result in the potential to generate reverse sensitivity effects.</u></p> <p><u>e) Constrain the ability to access or utilise renewable energy resources.</u></p>	<p>Mercury supports Policy 3b.2.10 but it needs to be expanded to address one of the most significant adverse effects that can arise as a result of residential units being established in the General Rural Environment, that being reverse sensitivity effects. The establishment of residential units should also not constrain the ability to access or utilise renewable energy resources (which are of national significance).</p>
Policy 3b.2.12 Minor residential unit	Support in part	<p>Amend Policy 3b.2.12 as follows:</p> <p>Policy 3b.2.12 Minor residential unit</p> <p>Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and to ensure that the future availability of</p>	<p>It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.</p> <p>A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment.</p>

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		the rural land resource will not be compromised <u>and to avoid the potential for reverse sensitivity effects.</u>	
Policy 3b.2.13 Avoiding reverse sensitivity	Support in part	Amend Policy 3b.2.13 as follows: Policy 3b.2.13 Avoiding reverse sensitivity Any adverse effects generated by an new sensitive activity must be located and managed within the allotment so as to avoid adversely affecting reverse sensitivity effects on permitted, and lawfully established <u>and/or consented</u> neighbouring activities.	Mercury supports a policy in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects. Mercury seeks an amendment to the policy for the same reasons set out in relation to the changes sought to Objective 3b.2.5.
Policy 3b.2.14 Commercial and industrial activity	Support in part	Amend Policy 3b.2.14 as follows: Policy 3b.2.14 Commercial and industrial activity Limit the scale of commercial and industrial activity (<u>excluding renewable electricity generation activities</u>) to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary production <u>and other</u> activities <u>provided for</u> within the General Rural Environment.	Because renewable electricity generation activities fall within the definition of industrial activities, they need to be excluded from the first part of the policy which seeks to limit commercial and industrial activities. Mercury supports the intent of the policy, but it needs to be widened to cover other activities (including renewable electricity generation activities) that are provided for and anticipated in the General Rural Environment beyond just primary production.
Policy 3b.2.15 Allotment size	Support	Retain Policy 3b.2.15.	Mercury supports Policy 3b.2.15 on the basis that it reinforces the intension that the General Rural Environment is for larger scale productive activities (rather than rural residential opportunities).
3b.3 Objectives and Policies –Rural Lifestyle Environment			
Objective 3b.3.1 Maintain the character of the Rural Lifestyle Environment	Oppose	Delete Objective 3b.3.1 and replace it with the following: Objective 3b.3.1 Enable Rural Residential Activities <u>Zone parts of the Rural Environment as Rural Lifestyle Environment to enable and provide for rural residential activities in appropriate locations where they will not give rise to reverse sensitivity effects on the surrounding General Rural Environment or Industrial Environments.</u>	This is an unexpected objective for the parts of the Rural Environment where a greater density of subdivision and development is anticipated and provided for. The objective should focus on enabling rural residential opportunities in appropriate locations (i.e. where they will not create reverse sensitivity effects on activities in the wider General Rural Environment or Industrial Environments). If Rural Lifestyle Environment are proposed in inappropriate locations (and no decision is made to amend that situation), it forces Mercury (and other parties) to seek to amend the rules and performance standards within the Rural Lifestyle Environment as an alternative means to avoid the creation of reverse sensitivity effects. It is preferable that only appropriate locations are zoned Rural Lifestyle Environment whereby activities occurring within those zones do not need to be constrained by way of the rules and performance standards.
Objective 3b.3.2 Avoid reverse sensitivity	Oppose in part	Amend Objective 3b.3.2 as follows: Objective 3b.3.2 Avoid reverse sensitivity Adverse reverse sensitivity effects, including conflict with on permitted, and legally established <u>and/or consented</u> activities in neighbouring Environments, are avoided.	Mercury supports an objective in the Rural Lifestyle Environment chapter that seeks to avoid reverse sensitivity effects. However, Mercury is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already <i>exists</i> . This is particularly concerning for Mercury. The objective needs to also cover consented activities which have yet to be constructed / undertaken. Mercury's geothermal generation activities, which do and are anticipated to occur in the District's General Rural Environment (as identified in the introductory text to this chapter and Strategic Directions chapter). From time-to-time new wells and pipelines will be required to establish to support the on-going operation of its geothermal generation plants. This objective and policy framework could allow housing to proliferation of new houses to establish in areas of the rural environment because there are few if any rural production activities operating.

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			Reverse sensitivity is an issue for Mercury. The introduction of new sensitive activities into the rural environment where rural production and renewable electricity generation exist has the potential to create complaint as the two are incompatible.
Objective 3b.3.3 Commercial and industrial activities	Support in part	Amend Objective 3b.3.3 as follows: Objective 3b.3.3 Commercial and industrial activities The establishment of commercial and industrial activities that have no functional need to locate and are incompatible with the rural residential activities occurring within the <u>Rural Lifestyle Environment</u> are avoided.	Mercury supports Objective 3b.3.3 but it needs to be more precisely drafted for accuracy and clarity.
Objective 3b.3.4 Consolidate rural lifestyle activities	Support	Retain Objective 3b.3.4.	Mercury supports the consolidation of Rural Lifestyle activities within identified and appropriately located Rural Lifestyle Environments.
Objective 3b.3.6 Impacts on community infrastructure	Oppose	Amend Objective 3b.3.6 as follows: Objective 3b.2.6 Impacts on community infrastructure The impacts on community infrastructure arising from subdivision and development are managed do not compromise the safe and efficient functioning of infrastructure.	An objective (or policy) that only seeks to “manage” something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupō District Plan. The objective should apply to all infrastructure, not just community infrastructure. These amendments are considered necessary so that there is a policy which achieves Objective 3b.3.2 (avoid reverse sensitivity).
Policy 3b.3.9 Character of the Rural Lifestyle Requested new policy 3b.3.6(i)	Support in part	Add a new point i) to Policy 3b.3.9 as follows: <u>i) An environment that is surrounded by a working rural environment including rural production, geothermal areas and renewable electricity generation activities.</u>	Mercury supports Policy 3b.3.9 but it also needs to recognise, and not have adverse effects on, the nature of the surrounding General Rural Environment.
Policy 3b.3.10 Lot sizes and setbacks for allotments adjoining the General Rural Environment	Support	Retain Policy 3b.3.10	Requiring larger lot sizes and greater building setbacks for new dwellings within the Rural Lifestyle Environment are two key methods for managing reverse sensitivity effects. Mercury therefore supports this policy on this basis. However, Mercury reiterates that these two measures alone will not always avoid the potential for reverse sensitivity effects (which is what new Objective 3b.3.2 requires), and this needs to be reflected across several policies within this sub-chapter. See the relief sought in relation to other objectives and policies.
Policy 3b.3.12 Minor residential unit	Support in part	Amend Policy 3b.3.12 as follows: Policy 3b.3.12 Minor residential unit Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and to further protect the character of the Rural Lifestyle Environment and to avoid reverse sensitivity effects.	A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment. It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.
4b.1 General Rules – General Rural Environment			
4b.1.1 Activities in the General Rural Environment	Support	Retain Rule 4b.1.1.	Mercury supports Rule 4b.1.1 on the basis that it is consistent with the approach throughout the rest of the Plan, is effects based, and enables activities to occur that do not need to be the subject of a resource consent application process.

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4b.1.2 Minor residential units	Support	<p>Amend Rule 4b.1.2 as follows:</p> <p>Add new matter of discretion as 4b.1.2(i) as follows:</p> <p>i. A minor residential unit which complies with the performance standards is a permitted activity.</p> <p>ii. A minor residential unit which does not comply with the performance standards is a restricted discretionary activity.</p> <p>When considering activities under Rule 4b.1.2 Council restricts the exercise of its discretion to the following matters:</p> <p>a. The proximity between the primary residential unit and the minor residential unit.</p> <p>b. The extent to which the residential unit and vehicle access point design, siting and external appearance adversely affects rural character and amenity.</p> <p>c. 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.</p> <p>d. Effect on nearby sites, including outlook and privacy.</p> <p>e. Whether the residential unit and the vehicle access point can be more appropriately located to maintain, enhance or restore indigenous biodiversity values.</p> <p>f. The ability to mitigate avoid adverse effects, <u>including reverse sensitivity effects</u>, through the use of screening, planting, landscaping, and alternative design, <u>and/or other means including restrictive covenants</u>.</p> <p>g. Proposed methods for the avoidance, remedying or mitigation of potential adverse effects, and the degree to which they would be successful</p> <p>h. The likelihood of future subdivision which results in the minor residential unit being on a separate allotment to the primary residential unit.</p> <p><u>i. The potential to constrain access to and/or the utilisation of renewable energy sources.</u></p>	<p>Minor residential units are sensitive activities whereby their establishment needs to be controlled so as to not result in reverse sensitivity effects.</p> <p>An additional criterion has been added to ensure that minor residential units do not constrain access to and/or the utilisation of renewable energy sources.</p>
4b.1.3 Temporary Activities	Support	Retain Rule 4b.1.3.	Mercury supports this rule.
4b.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Steamfields Requested new rule 4b.1.4(ii)	Support in part	<p>Retain Rule 4b.1.4, and amend it as follows, including new clause (ii).</p> <p>4b.1.4 Electricity Generation Core Sites, Renewable <u>Electricity Energy</u> Generation Activities and Geothermal Areas <u>Steamfields</u></p> <p>i. Any activity involving continued operation, maintenance and minor upgrading of existing electricity generation core sites, geothermal areas steamfield, renewable energy electricity generation activities and associated structures and ancillary activities is a permitted activity.</p> <p><u>ii) Activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators are a permitted activity.</u></p> <p>NOTE: For the purpose of this rule “maintenance” means: All activities associated with the protective care, and monitoring of a hydro dam, a geothermal or hydroelectric power station, geothermal steamfields and associated structures, in order to monitor, test and/or arrest the processes of decay, structural fatigue, erosion or dilapidation of all associated structures and includes maintenance of surrounds and water areas.</p> <p>NOTE: For the purpose of this rule “minor upgrading” means: Structural improvement, repair and replacement or upgrade of <u>components, or activities required for the continued safe and efficient operation including</u> worn or technically deficient parts of <u>any structure including</u> the powerhouse, hydro dams, separation plants, switchyards,</p>	<p>Mercury supports the retention of Rule 4b.1.4 (being a continuation of the Rule in currently in the Rural Environment) with a number of minor amendments. This is the enabling rule that appropriately provides for the operation, maintenance and minor upgrading of renewable electricity generation activities in the General Rural Environment.</p> <p>The term “Geothermal Areas” has been used rather than “Geothermal Steamfields” due to Section O of the Plan identifying and mapping Geothermal Areas.</p> <p>A second clause is requested to be added to the rule on the basis that Policy G of NPS-REG states:</p> <p><i>“Regional policy statements and regional and district plans shall include objectives, policies, and methods (including rules within plans) to provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators.”</i></p> <p>Activities of this nature tend to be temporary activity and any effects are easily remediated.</p>

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		intake, control and diversion structures, wells, pipes, tunnels, cables, other equipment and accessory buildings and structures of similar character and scale , and includes associated drilling, vehicles, infrastructure, machinery , testing, monitoring, earthworks and vegetation removal. Also the extension to existing Buildings and Structures, and the erection of new Buildings and Structures. up to 100m2 in area and not exceeding the maximum height standard for the Rural Environment and the erection of any aerial, antennae or communication dish not exceeding 5m2 in area located on top of a hydro or geothermal existing structure, subject to compliance with the Noise Performance Standard.	
4b.1.5 Commercial and industrial activities, and home businesses,	Support in part	Amend Rule 4b.1.5 as follows: i. A commercial, industrial activity or home business which complies with the performance standards is a permitted activity . ii. A commercial, industrial activity or home business which does not comply with the performance standards is a restricted discretionary activity . When considering activities under Rule 4b.1.5ii Council restricts the exercise of its discretion to the following matters: a. The daily vehicle movements expected to and from the allotment. b. The effect of the activity on the rural character of the area, having regard to visual effects and lighting effects. c. The effect of the activity on surrounding land uses (including reverse sensitivity effects) and how these effects can be managed onsite and/or mitigated. d. The hours of operation for the activity. e. The proposed signage associated with the activity.	Home businesses could include sensitive activities and need to avoid creating reverse sensitivity effects.
4b.1.7 High voltage transmission lines	Support in part	Amend Rule 4b.1.7. as follows: 4b.1.7 Buildings and Structures in proximity to High voltage transmission lines i. Any building or structure (except network utilities and Renewable Electricity Generation Activities) located within 0 – 12 meters of a high-voltage transmission line is a restricted discretionary activity .	Mercury supports this rule as it seeks to ensure the safe operation of transmission lines, through the management of risk associated with structures in close proximity to high voltage infrastructure. Electricity generation is not a network utilities, so needs an exclusion to avoid unnecessary consents.
4b.1.8 Buildings within Outstanding Landscape Areas	Support in part	Retain Rule 4b.1.8 but amend the first exception to the rule as follows: EXCEPTION: This rule will not apply to the erection of structures: a. Associated with existing renewable electricity generation activities including within Electricity Generation Core Sites. b. ...	Mercury supports this exception as we agree that this RDA rule should not apply to structures within Electricity Generation Core Sites. However, there is no reason why this exception should not apply to all other existing renewable electricity generation activities.
4b.1.9 Earthworks within Outstanding Landscape Areas	Support in part	Retain 4b.1.9 but amend the exception as follows: EXCEPTION: This rule will not apply to Earthworks associated with existing and consented renewable electricity generation activities including within Electricity Generation Core Sites	Mercury supports this exception as we agree that this RDA rule should not apply to earthworks within Electricity Generation Core Sites. However, we consider that the exception should be extended to include other existing and consented renewable electricity generation activities.
4b.2 Performance Standards – General Rural Environment			
4b.2.1 Vehicle movements	Support in part	Retain 4b.2.1 but amend the exception as follows: EXCEPTION:	Mercury supports Rule 4b.2.1 subject to the exception being expanded to include renewable electricity generation activities.

Plan Section / Provision	Support / Oppose	Relief sought	Reasons for Submission
		This performance standard shall not apply to traffic movements involved in forest harvesting operations <u>or existing and consented renewable electricity generation activities.</u>	
4b.2.5 Maximum building height	Support in part	<p>Amend Rule 4b.2.5 as follows:</p> <p>4b.2.5 Maximum building height</p> <p>i. 12 metres.</p> <p>ii. 5 meters in a height restricted area.</p> <p>iii. 5 meters in an Outstanding Landscape Area.</p> <p>iv. 15 meters for <u>renewable Electricity Generation activities</u> on land identified as a Geothermal Area in Section O within an Electricity Generation Core Site.</p> <p>EXCEPTIONS:</p> <ul style="list-style-type: none"> <u>Activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators including wind monitoring masts – no height limit</u> Cranes being used as part of any construction or maintenance works for the duration of the works – no height limit. Drilling Rigs for up to 60 days per well allotment – no height limit. 	<p>Mercury seeks amendments to Rule 4b.2.5 to make the rule applicable to all renewable electricity generation activities within Geothermal Areas.</p> <p>An additional exception has been added to the rule on the basis that Policy G of NPS-REG states:</p> <p><i>“Regional policy statements and regional and district plans shall include objectives, policies, and methods (including rules within plans) to provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators.”</i></p> <p>Activities if this nature tend to be temporary activity and any effects are easily remediated.</p>
4b.2.6 Minimum building setbacks	Support in part	<p>Amend Rule 4b.2.6 as follows:</p> <p>4b.2.6 Minimum building setbacks</p> <p>i. 30 metre setback for dwellings and minor residential units from the front boundary.</p> <p>ii. 15 metres from all other boundaries</p> <p>iii. 25 metres in Outstanding Landscape Areas from all boundaries.</p> <p>iv. 200 metres for buildings for the management of farmed animals from all boundaries.</p> <p>v. There shall be no front boundary setback for buildings and activities associated with Electricity Generation and Renewable <u>Energy Electricity</u> Generation Activities on land identified as Geothermal Area in Section O within an Electricity Generation Core Site where the road extends over any power generation Building or Structure.</p> <p>vi. There shall be no boundary setback for buildings and activities associated with <u>Renewable Electricity Generation Activities</u> on land identified as Geothermal Area in Section O <u>including</u> within an Electricity Generation Core Site</p> <p>EXCEPTIONS:</p> <ul style="list-style-type: none"> For the purpose of this performance standard water tanks are not required to comply with the setback requirements in this standard. 	Mercury seeks minor amendments to Rule 4b.2.6 to make it more accurate and workable.
4b.2.7 Minor residential units Requested new rule 4b.2.7(c)	Oppose in part	<p>Amend Rule 4b.2.7 as follows and to add a new clause (c):</p> <p>4b.2.7 Minor residential units</p> <p>A maximum of one minor residential unit per primary residential unit per allotment.</p> <p>i. All minor residential <u>units</u> or accommodation activity units shall:</p> <ol style="list-style-type: none"> Be no larger than 100m² in size Be located no greater than 20 metres from the primary residential unit. <u>Be located no closer than the existing primary residential unit on the same site to a Consent Area which is the subject of resource consents issued by the Waikato Regional Council for the take or discharge of geothermal fluid exceeding 1,000 tonnes per day provided that this clause shall not apply to properties more that 300m away from any aforementioned Consent Area.</u> Share an accessway/driveway with the primary residential unit. 	Minor residential units need to be located so that they do not create additional restrictions on renewable electricity generation activities by, for example, moving a point of noise compliance closer to the source of noise.

Plan Section / Provision	Support / Oppose	Relief sought	Reasons for Submission
		EXCEPTION: Papakāinga NOTE: Minor residential units also include accommodation activities, tiny homes/houses, caravans and other structures used for accommodation for more than two consecutive months in a calendar year on the allotment.	
4b.2.8 Commercial and industrial activities, and home businesses Requested new rule 4b.2.8(iii)	Support in part	Amend Rule 4b.2.8 by including a new clause (iii) as below: 4b.2.8 Commercial and industrial activities, and home businesses i. Any indoor or outdoor space used for commercial, industrial or home business purposes, shall have a gross floor area less than 100m ² for indoor activities, or 100m ² of land area for outdoor activities. ii. For home businesses the principal operator of the home business must be a permanent resident on the site to which the home business relates. <u>iii. Home businesses shall be located no closer than the existing primary residential unit on the same site to a Consent Area which is the subject of resource consents issued by the Waikato Regional Council for the take or discharge of geothermal fluid exceeding 1,000 tonnes per day provided that this clause shall not apply to properties more than 300m away from any aforementioned Consent Area.</u> EXCEPTION: Home business or commercial activities within a Papakāinga.	Home businesses need to be located so that they do not create additional restrictions on renewable electricity generation activities.
4b.2.9 Maximum Noise – Limits	Support	Retain 4b.2.9	Mercury supports this rule.
4b.2.10 Maximum Noise – Construction Noise	Support	Retain 4b.2.10	Mercury supports this rule.
4b.2.11 Maximum Noise – Electricity Generation Core Sites	Support	Retain 4b.2.11	Mercury supports this rule.
4b.2.12 Maximum Noise – Well Drilling and Testing	Support	Retain 4b.2.12	Mercury supports this rule.
4b.2.13 Maximum Noise – Other	Support in part	Amend Rule 4b.2.13 as follows: 4b.2.13 Maximum Noise – Other i. Nothing in the foregoing Performance Standards shall apply to farm animals including working dogs, and to agricultural and forestry vehicles, agricultural and forestry machinery or equipment (including mobile plant at produce packing facilities but excluding sawmilling equipment), operated and maintained in accordance with the manufacturer's specifications in accordance with accepted management practices (e.g. for milking, spraying, harvesting, packing, forest harvesting and the like). Provided that the activity shall comply with the requirements of S16 of the Resource Management Act 1991 ii. Nothing in the foregoing Performance Standards shall apply to sirens, circuit breakers, <u>bursting discs, emergency or upset operating conditions</u> and hydro spills associated with the operation of <u>Renewable Electricity Generation Activities Core sites</u> . Provided that the activity shall comply with the requirements of S16 of the Resource Management Act 1991.	Mercury supports this rule subject to minor amendments to ensure it applies to all applicable circumstances.
4b.2.15 Signage	Support	Retain Rule 4b.2.15.	Mercury supports this rule.

Plan Section / Provision	Support / Oppose	Relief sought	Reasons for Submission
4b.5 Subdivision			
4b.5.1 Subdivision – General Rural Environment	Support in part	Retain Rule 4b.5.1 subject to an additional matter of control as set out in Rule 4b.5.3 (as per the relief below).	Mercury supports this rule subject to an additional matter of control as set out in Rule 4b.5.3 (as per the relief below).
4b.5.2 Subdivision – Rural Lifestyle Environment that adjoins the General Rural Environment	Support in part	Retain Rule 4b.5.2 subject to an additional matter of control as set out in Rule 4b.5.3 (as per the relief below).	Mercury supports this rule subject to an additional matter of control as set out in Rule 4b.5.3 (as per the relief below).
4b.5.3 Subdivision – Rural Lifestyle Environment that does not adjoin the General Rural Environment Requested additional Matter of Control 4b.5.3(i)	Support in part	<p>Amend Rule 4b.5.3 to include an additional matter of control as 4b.5.3(i) as follows:</p> <p>4b.5.3 Subdivision – Rural Lifestyle Environment that does not adjoin the General Rural Environment</p> <p>i. Subdivision resulting in lots that are 2 hectares or larger that do not adjoin the General Rural Environment is a controlled activity.</p> <p>ii. Subdivision resulting in lots that are smaller than 2 hectares that do not adjoin the General Rural Environment is a non-complying activity.</p> <p>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:</p> <p>a) 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 management of stormwater.</p> <p>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.</p> <p>c) 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.</p> <p>d) The extent to which earthworks and vegetation removal is required to create vehicle tracks and building platforms.</p> <p>e) Any actual or potential effects on areas or features of cultural, historic, landscape or natural value as identified in the plan.</p> <p>f) The imposition of conditions in accordance with Sections 108 and 220 of the Resource Management Act 1991.</p> <p>g) Any potential adverse effects from Natural Hazards, including flood inundation or erosion from the District’s waterways and Lakes.</p> <p>h) 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.</p> <p><u>i) Any effects on the functioning of the Rural Environment including adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources.</u></p>	<p>Mercury supports the inclusion of an additional matter over which control is reserved for controlled activities.</p> <p>The matters of control need to refer to renewable electricity generation activities and renewable energy resources as they are located in the existing Rural Environment</p>

Plan Section / Provision	Support / Oppose	Relief sought	Reasons for Submission
4b.5.4 Subdivision – Default Activity Status	Support	Retain Rule 4b.5.4.	Mercury supports this rule.
4b.5.5 Subdivision resulting in a new public road, or extension of existing public road	Support	Retain Rule 4b.5.5.	Mercury supports this rule.
4b.5.6 Subdivision – Other	Support	Retain Rule 4b.5.5.	Mercury supports this rule.
4b.5.7 Subdivision – Outstanding Landscape Areas	Support	Retain Rule 4b.5.7.	Mercury supports this rule.
4b.5.8 Subdivision – Bonus Lots	Support	Retain Rule 4b.5.8.	Mercury supports this rule.
4b.5.9 Subdivision – More than 12 allotments	Support	Retain Rule 4b.5.9.	Mercury supports this rule.
4e.2 Foreshore Protection	Support with amendment	<p>Amend rule 4e.2.1 as follows:</p> <p>4e.2.1 Foreshore Protection Any building on or above ground within a Foreshore Protection Area is a discretionary activity.</p> <p>i. EXCEPTION: Electricity Generation Core Sites (as identified on the planning maps) – permitted activity where in accordance with Rule 4b.2.4 4e.2.1 and where located no more than 100 metres from any existing structure associated with power generation.</p>	As a consequential change to the relief sought rule 4e.2.1 Foreshore Protection, must be edited to remove the reference to rule 4b.2.4 which no longer relates. Rule 4e.2.1 Foreshore Protection, must be edited to refer to rule 4b.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Areas



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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
Form5SubmissionforPlanChange 38 and 42 Tauhara Quarries Ltd v1

Submitter: Tauhara Quarries Ltd, PO Box 153, Matamata 3440, Attention: Dudley Clemens dudley.clemens@jswap.co.nz

Consultant: 4Sight – part of SLR, 214, Durham Street, Christchurch 8011, Attention: Duncan Whyte duncan.whyte@4sight.co.nz

Tauhara Quarries Ltd supports the points made in the submission by the Aggregate and Quarry Association to Plan Change 38 and Plan Change 42 since it emphasises inter alia:

1. The importance of aggregate for the construction sector, for housing and transport infrastructure, and for climate change adaption and resilience.
2. The definition for rural industry includes quarrying but not explicitly.
3. Aggregates will be required to protect against extreme weather events as well as restoring damaged infrastructure as a response to climate change.
4. If aggregates are not available locally, there will be greater transport distances adding to project costs and increased vehicle emissions.
5. The National Planning Standards provide a useful definition for primary production that should be adopted instead of the bespoke definition for rural industry. This will provide greater clarity in avoiding the potential for conflict between quarrying activities and other land uses in the Rural Environments.
6. Once the provisions are established for the Rural Lifestyle Environment as distinct from the General Rural Environment, they may expand to new locations over time with consequences for existing or future quarrying activities and reverse sensitivity effects.

With this in mind, some specific amendments are requested in this submission by Tauhara Quarries Ltd.

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
<i>PC 38 – Strategic Directions</i>	<i>2.5. Strategic Direction 5 Significant and Local Infrastructure</i>	<i>Amend</i>	<i>Amend.</i> <i>Include an objective that recognises the strategic importance of producing aggregate to support significant and local infrastructure. e.g.</i> <u><i>5. The importance of quarrying as a component of primary production that supports the construction and maintenance for development and infrastructure is recognised.</i></u>	<i>It is important to provide for the activities that are necessary to construct and maintain the infrastructure and broader development as well as for the infrastructure itself.</i>
<i>PC 38 – Strategic Directions</i>	<i>2.5. Strategic Direction 5 Significant and Local Infrastructure 2.5.3 Policy 2</i>	<i>Amend</i>	<i>Amend.</i> <i>Recognise the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure, including those activities which support them such as quarrying.</i>	<i>A change to the policy that recognises that there are other activities that are needed to support this nationally and regionally significant infrastructure.</i>
<i>PC 38 – Strategic Directions</i>	<i>2.5. Strategic Direction 5 Significant and Local Infrastructure 2.5.3 Policy 3</i>	<i>Amend</i>	<i>Amend.</i> <i>Subdivision, land use and development will not adversely affect (including reverse sensitivity effects) the effective and safe functioning of infrastructure, including those activities which support them such as quarrying.</i>	<i>A change to the policy that recognises that there are other activities that are needed to support this nationally and regionally significant infrastructure that may also require protection from reverse sensitivity effects.</i>
<i>PC 42 – General Rural and Rural Lifestyle Environments</i>	<i>Section 10 Definitions</i>	<i>Amend</i>	<i>Amend.</i> <i>Rural Industry – 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, dairy farming, quarrying activities, and geothermal/electricity generation.</i>	<i>Where guidance is available in the National Planning Standards this should be adopted for long-term consistency and establishing a sound direction for development of the district plan.</i> <i>The NPS definition of primary production means:</i>

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			<p><i>Add:</i></p> <p><i>primary production means:</i></p> <p><i>(a) any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities; and</i></p> <p><i>(b) includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a);</i></p> <p><i>(c) includes any land and buildings used for the production of the commodities from a) and used for the initial processing of the commodities in b); but</i></p> <p><i>(d) excludes further processing of those commodities into a different product.</i></p>	<p><i>(a) any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities; and</i></p> <p><i>(b) includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a);</i></p> <p><i>(c) includes any land and buildings used for the production of the commodities from a) and used for the initial processing of the commodities in b); but</i></p> <p><i>(d) excludes further processing of those commodities into a different product.</i></p> <p><i>The National Planning Standards have a definition for rural industry that explicitly references primary production i.e. rural industry means an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production. That could be an alternative to amending the definition of rural industry as well as adding the definition of primary production.</i></p>
<p><i>PC 42 – General Rural and Rural Lifestyle Environments</i></p>	<p><i>3b.2 Objectives and Policies – General Rural Environment, Objective 3b.2.1</i></p>	<p><i>Support</i></p>	<p><i>Retain.</i></p> <p><i>Objective 3b.2.1 Enable Primary Production</i></p> <p><i>Primary production is enabled by protecting the availability of the rural land resource and its productive capability.</i></p>	<p><i>This would be supported with the inclusion of a definition of primary production as above. It makes it clear that quarrying is a part of the productive capability of the rural land resource.</i></p>
<p><i>PC 42 – General Rural and Rural Lifestyle Environments</i></p>	<p><i>3b.2 Objectives and Policies – General Rural Environment, Objective 3b.2.3</i></p>	<p><i>Support</i></p>	<p><i>Retain.</i></p> <p><i>Objective 3b.2.3 Rural industry</i></p> <p><i>Rural industry is enabled whilst general commercial and industrial activities not</i></p>	<p><i>No change is necessary if the definition of rural industry is amended above, or the definition of the National Planning Standards is used in conjunction with adding a definition for primary production.</i></p>

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
			<i>having a locational need to be within the General Rural Environment, other than home-business, are avoided.</i>	<i>It is important that quarrying activities are clearly enabled with this objective.</i>
<i>PC 42 – General Rural and Rural Lifestyle Environments</i>	<i>3b.2 Objectives and Policies – General Rural Environment, Objective 3b.2.5</i>	<i>Support</i>	<i>Retain.</i> <i>Objective 3b.2.5 Avoidance of reverse sensitivity</i> <i>Reverse sensitivity effects on permitted and legally established activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided.</i>	<i>Quarrying activities may be permitted or lawfully established through resource consent. It is important that reverse sensitivity effects are managed through this objective and related policy to provide guidance to neighbouring development in the Rural General Environment.</i>
<i>PC 42 – General Rural and Rural Lifestyle Environments</i>	<i>3b.2 Objectives and Policies – General Rural Environment, Policy 3b.2.13</i>	<i>Support</i>	<i>Retain.</i> <i>Policy 3b.2.13 Avoiding reverse sensitivity</i> <i>Any adverse effects generated by an activity must be managed within the allotment so as to avoid adversely affecting permitted and lawfully established neighbouring activities.</i>	<i>Quarrying activities may be permitted or lawfully established through resource consent. It is important that reverse sensitivity effects are managed through this policy to provide guidance to neighbouring development in the Rural General Environment.</i>
<i>PC 42 – General Rural and Rural Lifestyle Environments</i>	<i>3b.3 Objectives and Policies – Rural Lifestyle Environment, Objective 3b.3.2 Avoid reverse sensitivity</i>	<i>Support</i>	<i>Retain.</i> <i>Objective 3b.3.2 Avoid reverse sensitivity</i> <i>Adverse reverse sensitivity effects, including conflict with permitted and legally established activities in neighbouring Environments, are avoided.</i>	<i>Quarrying activities may be permitted or lawfully established through resource consent. It is important that reverse sensitivity effects are managed through this policy to provide guidance to neighbouring development even though it may be located in the Rural General Environment.</i>
<i>PC 42 – General Rural and Rural Lifestyle Environments</i>	<i>3b.3 Objectives and Policies – Rural Lifestyle Environment, Objective 3b.3.3 Commercial and industrial activities</i>	<i>Amend</i>	<i>Amend.</i> <i>Objective 3b.3.3 Commercial and industrial and rural industry activities</i> <i>The establishment of commercial and industrial and rural industry activities that have no functional need to locate and are incompatible with the rural residential activities occurring within the Environment are avoided.</i>	<i>Aggregate resources may still be located in these areas so it is important that this objective supports the establishment of rural industry within the amended definition as above. An alternative may be to add reference to primary production provided that a definition is also included.</i>

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
<i>PC 42 – General Rural and Rural Lifestyle Environments</i>	<i>3b.3 Objectives and Policies – Rural Lifestyle Environment, Policy 3b.3.9</i>	<i>Amend</i>	<i>Amend.</i> <i>Policy 3b.3.9 Character of the Rural Lifestyle Environment</i> <i>Manage the anticipated character of the Rural Lifestyle Environment as defined by:</i> <i>a) Buildings on different sites are separated from each other in a way that creates a sense of privacy.</i> <i>b) Accessory buildings that do not dominate the landscape.</i> <i>c) Dwellings may be large but are surrounded by open space and do not dominate the landscape.</i> <i>d) A general absence of urban infrastructure including community stormwater and wastewater services.</i> <i>e) An environment which includes residential activities, rural productive primary production activities and home business activities.</i> <i>f) Noise related to production activities during the day but low levels of noise at night.</i> <i>g) Low levels of light spill.</i> <i>h) Limited signage that directly relates to the activity operating on the site.</i>	<i>This change assumes adoption of the primary production definition above. Rural productive activities is not defined in the plan. It is important that this allows for the full range of primary production activities that includes quarrying. Otherwise, an undefined term such as rural productive activities could lead to uncertainty when applying this policy.</i>
<i>PC 42 – General Rural and Rural Lifestyle Environments</i>	<i>3b.3 Objectives and Policies – Rural Lifestyle Environment, Policy 3b.3.10</i>	<i>Amend</i>	<i>Amend.</i> <i>Policy 3b.3.10 Lot sizes and setbacks for allotments adjoining the Rural Lifestyle Environment</i> <i>Require larger lot sizes and greater building setbacks for allotments adjoining the General Rural Environment or <u>primary production activities in the Rural Lifestyle Environment</u> to manage reverse sensitivity.</i>	<i>This is a key mechanism to avoid reverse sensitivity effects on lawfully established activities either for primary production in the General Rural Environment or in the Rural Lifestyle Environment itself. The changes are necessary to clarify this as relevant to all primary production including quarrying.</i>



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Last name: Harding

On behalf of:
Aggregate and Quarry Association

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Suburb:

City:

Country: New Zealand

Email: jeremy@straterra.co.nz

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
AQA Submission - Draft Taupo District Plan

Submission from the AQA on the Taupō District Plan Changes

December 2022

Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing construction material companies which produce 50 million tonnes of aggregate and quarried materials consumed in New Zealand each year.

Funded by its members, the AQA has a mandate to increase understanding of the need for aggregates to New Zealanders, improve our industry and users' technical knowledge of aggregates and assist in developing a highly skilled workforce within a safe and sustainable work environment.

We would like to thank Taupō District Council for the opportunity to comment on the [Taupō District Plan Changes](#).

The Plan Changes which our comments are most relevant to are:

- [Plan Change 38](#) (Strategic Directions) – a new Strategic Directions chapter; and
- [Plan Change 42](#) (General Rural & Rural Lifestyle Environments) – full review of the Rural chapters, including new provisions for primary production and rural industry.

Recommendations and Key Points

- We recommend the text, policies and objectives of the Strategic Directions Chapter be amended to recognise the strategic importance of aggregate.
- In the General Rural & Rural Lifestyle Environments, we recommend the use of National Planning Standards definitions to avoid confusion. This is particularly around the area of rural industries and primary production as it relates to quarries.
- As the Rural Lifestyle Environments expand it is important that locations designated for these areas do not clash with areas of quarrying potential.
- The District Plan changes must not shut off access to potential aggregate resources. Council planning must identify where the rock is located and protect those areas

General Comments on Aggregate

Importance of Aggregate

This submission focuses on issues in the plan as they relate to the aggregate and quarrying sector.

Aggregate (crushed rock, gravel and sand) is an essential resource for the construction sector, for housing and transport infrastructure and for climate change adaptation.

Due to unprecedented levels of construction and infrastructure development activity, there is growing demand for aggregate which is in short supply in many parts of New Zealand including the Taupō district.

Characteristics of Aggregate

Aggregate is a locationally constrained resource. Quarrying can only occur where suitable aggregate resource exists.

It is therefore important that the District Plan does not shut off access to potential aggregate resources. Council planning must identify where the rock is located and protect those areas from other development and alternative land uses. We are happy to assist in identifying such resources.

Due to its weight and volume, aggregate is very expensive to transport. An additional 30km travel typically doubles the cost of aggregate. This highlights that shifting large volumes from outside the region or far from where it is to be used is very expensive and would increase the cost of many of the proposed projects.

Specific Comments on Plan Change 38 – Strategic Directions

We generally support the new Strategic Directions Chapter as drafted in the plan change. The chapter provides an outline of the key strategic and significant resource management matters for the Taupō district.

Many of the themes included in the chapter (e.g. urban form, climate change, and infrastructure) have a connection with aggregate and there is merit in acknowledging this in the district's strategic direction.

Urban Form and Development

Aggregate and quarries are very relevant to the urban form section of the Strategic Direction Chapter.

Not only is aggregate needed for the construction of urban infrastructure, good planning is required to ensure that available resource is not sterilised by urban expansion. As stated in the earlier comments, aggregate is locationally constrained – it is where it is. Council planning must identify where the rock is located and protect

those areas. It is also expensive to transport, meaning that the risk of reverse sensitivity and these transport costs need to be balanced.

Climate Change

Aggregates are particularly relevant to the Effects of Climate Change that are identified in this section of the Strategic Direction Chapter.

Aggregates are needed to make infrastructure more resilient to resist extreme weather events. They will be required to build the structures that will protect against the effects of stronger storms, sea level rise and increased flooding on our infrastructure, including sea walls. They will also be at the fore in fixing damage as well as relocation and rebuild of infrastructure and housing. It should also be noted that sand, limestone and aggregates are an essential ingredient in cement and concrete manufacture.

Infrastructure

The same issues set out above under urban development apply to aggregates and infrastructure. It is an essential component of infrastructure and good planning is required.

In addition to this, just as regionally and nationally significant infrastructure is identified in the plan as requiring attention, the same to quarries due to their regional significance and locationally constrained nature.

Recommendation

We recommend the text, policies and objectives of these three sections be amended to recognise the strategic importance of aggregate in each of them.

It would be helpful if the chapter linked well to the rest of the plan so that these things had to be taken account of.

Specific Comments on Plan Change 42 – General Rural & Rural Lifestyle Environments

New Definitions

We note the document and the plan change and the plan itself does not make much use of the National Planning Standards including in the definitions.

The proposed **definition of 'rural industry' in** the proposed plan change covers quarrying but it is not explicit.

“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, dairy farming and geothermal/electricity generation."

The plan uses rural industry rather than 'Primary Production' which is part of the National Planning Standards. This definition of Primary Production includes quarrying.

We recommend the use of National Planning Standards definitions to avoid confusion and potential duplication. This is particularly important around the area of rural industries and primary production as it relates to quarries.

The National Planning Standards definitions of Earthworks, Primary Production, Quarry and Quarrying Activities are particularly important for the sector.

New Rural Chapters

We support the new chapters 3b and 4b which includes objectives and policies and rules and performance standards for the General Rural and the Rural Lifestyle Environments.

We support the intent of the new chapter's provisions which seek to limit the scale of activities within these environments unless they have a locational need to be. This is a sensible approach, consistent with our views on aggregate provision as discussed earlier.

Any activity is permitted if it complies with all the Rural Lifestyle Environment & district-wide performance standards (and is not identified as controlled, restricted discretionary, discretionary or non-complying activity) otherwise, the activity defaults to discretionary. Quarrying will usually be permitted or discretionary, subject to compliance with all performance standards.

As the Rural Lifestyle Environments expand, we agree it will be important that locations designated for these areas are appropriate. As set out earlier in this submission, it is particularly important for our sector that they do not clash with areas of quarrying potential.

Wayne Scott

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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 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.3 Strategic Direction 3 Urban Form and Development > 2.3.2 Objectives

Points: 84.1

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

Amend?

Support

Retain with amendment as shown below.

3. Subdivision, use and development of land in appropriate locations which will have demonstrable social and cultural benefits to the District's community will be supported.

Include reason(s) for your submission point

Genesis generally supports the proposed objectives. A minor edit is suggested to provide clarity.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.3 Strategic Direction 3 Urban Form and Development > 2.3.3 Policy **Points: 84.2**

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

Seek amendment

Retain provisions subject to amendments below

5. Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure (including development and of additional infrastructure), according to the capacity limitations of that infrastructure.

10. Manage subdivision use and development of land to ensure that it will not:

- a. have an adverse effect on the functioning of the environment where it is located,
- b. unduly conflict with existing activities on adjoining properties and the surrounding areas,
- c. compromise development consistent with the intent and planned urban built form of the environment where it is located
- d. give rise to reverse sensitivity effects from existing uses

Include reason(s) for your submission point

Genesis generally supports the proposed policies. However, in respect of Policy 10, Genesis considers conflicts need to be avoided with activities in the wider surrounding environment, not just on adjoining properties. In addition, reverse sensitivity effects do not arise from "existing uses" – they arise from new or expanded sensitive activities locating in proximity to existing uses. Suggested changes are therefore made to accurately reflect the intent of Policy 10.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.4 Strategic Direction 4 Climate Change **Points: 84.3**

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

Seek amendment

Retain 2.4 overview statement subject to amendments below.

2.4 STRATEGIC DIRECTION 4 CLIMATE CHANGE

Climate change has been identified as an issue which is important globally and within the Taupō District. A warming environment, longer and drier droughts and increased intensity of storm events are anticipated. It is important that the District and its communities are able to adapt to the effects of climate change to be resilient and safe.

For environmental management and planning purposes there are two separate, but important aspects of climate change:

1. Effects on climate change – which refers to activities that may lead to an increase in greenhouse gasses and those which may result in a reduction of greenhouse gasses from discharged to the atmosphere or help to facilitate efforts towards decarbonisation, including the electrification of home heating, transport and industry.
2. Effects of climate change – which are the effects caused by climate change such as more frequent flooding, droughts or intensive weather events which can endanger communities, assets and infrastructure.

It is important to consider both of these aspects of climate change to effectively enable people and communities to provide for their social, economic, and cultural well-being and for their health and safety. Supporting positive climate change outcomes and ensuring that the effects of climate change are recognised and provided for will assist in planning for a district which helps avoid, does not contribute to, and is resilient to, climate change. 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.

Include reason(s) for your submission point

Climate change is one the most significant issues facing the entire planet. As noted in section 2.5 Strategic Direction 5 Significant and Local Infrastructure, the Taupō District provides up to 20% of New Zealand's electricity supply. There are more than 20 renewable electricity power stations in the Taupō District, mostly located in the Rural Environment. It is therefore one of the most significant land uses in the Taupō District.

Genesis consider the importance of renewable electricity generation needs to be appropriately recognised and provided for in the Taupō District Plan, particularly within this section that sets out how climate change is to be addressed within the Taupō District. In that regard, the first priority should be to support activities that will help avoid climate change occurring in the first place. High on that list is renewable electricity generation.

The minor changes are therefore suggested to strengthen the overview statement leading to the objectives and policies in this section.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.4 Strategic Direction 4 Climate Change > 2.4.2 Objective **Points: 84.4**

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

Seek amendment

Retain 2.4.2 Objective subject to amendments below.

2.4.2 Objectives

1. Subdivision, use and development of land in the Taupō District will result in positive climate change outcomes.
2. An increase in the amount of electricity generated from renewable sources within the Taupō District to assist with the decarbonisation of the economy.
3. Subdivision, use and development of land in the Taupō District will be resilient to the current and future effects of climate change on the District's current and future communities, including any disproportionate effects on Māori.
4. The Taupō District is well prepared to adapt to the risks and effects from climate change, such as natural hazards.

Include reason(s) for your submission point

Genesis supports the proposed directions for community resilience and adaptation to the effects of climate change. However, with the serious implications of climate change being increasingly experienced across New Zealand, Genesis considers explicit references for direct actions are required in conjunction with objectives that build resilience and adaptation. Genesis considers a new objective should be included that explicitly recognises the increasing contribution renewable electricity generation in the District has on reducing greenhouse gas emissions and mitigating the potential effects of climate change.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.4 Strategic Direction 4 Climate Change > 2.4.3 Policy **Points: 84.5**

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

Seek amendment

Retain 2.4.3 Policy subject to amendments below.

2.4.3 Policies

1. Land use activities which will result in positive climate change outcomes, including through reducing greenhouse gas emissions and decarbonisation, will be supported and encouraged.
2. Recognise and provide for the use and development of the District's renewable energy resources to facilitate decarbonisation of the economy, including a reduction in greenhouse gas emissions, increased electricity generation capacity and improved security of supply including transmission.
3. Enable the upgrading and maintenance of existing and the development of new renewable electricity generation activities, including where contributing to one of the following:
 - adaptation required to mitigate risks from climate change
 - provides for more electricity output, or greater efficiency
 - continued safe, efficient and secure operation.
24. Land use activities which will ~~unduly~~ accelerate the effects of climate change will be discouraged.
35. 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.
46. Subdivision, use and development of land must demonstrate resilience to the effects of climate change over time.

Include reason(s) for your submission point

As outlined in 2.4.2 Objective above, Genesis considers two new policies need to be included which specifically provide for and enable activities that will help address climate change.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.5 Strategic Direction 5 Significant and Local Infrastructure **Points: 84.6**

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

Seek amendment

Retain 2.5 overview statement subject to amendments below.

2.5 STRATEGIC DIRECTION 5 SIGNIFICANT AND LOCAL INFRASTRUCTURE

Infrastructure, as defined in the Resource Management Act generally encompasses physical services and facilities which enable society to function, such as the three waters network, transport, communications, energy electricity generation, transmission and distribution networks, and any other network utilities undertaken by network utility operators.

Infrastructure is critical to the social and economic wellbeing of people and communities, including providing for their health and safety, and has national, regional and local benefits. However, inappropriately located or designed land use activities can adversely affect the safe and effective functioning of significant and locally important infrastructure and the natural resources on which they rely on to operate.

The Taupō District plays an important role in the location and provision of nationally 'significant infrastructure'. Its central location and natural resources means that Taupō is home to:

- State highways (1, 5, 32, 41 and 47).
- the national grid electricity transmission network
- renewable electricity generation facilities ~~that connect with the national grid~~, accounting for up to 20% of New Zealand's total electricity demand
- Airports used for regular air transport services by aeroplanes

The Taupō District is also home to Regionally Significant Infrastructure including municipal waste water systems, the telecommunications and electricity networks.

In addition to nationally and regionally significant infrastructure, local roads and other infrastructure (including development and additional infrastructure) is vital for the ongoing functioning of the ~~Districts~~ District's urban and rural communities.

Include reason(s) for your submission point

Genesis generally supports the proposed overview statement which identifies the range of infrastructure important within the District. Minor changes are however suggested to provide clarity and accuracy. In particular, Genesis considers “energy generation” should be more accurately referenced as “electricity generation”. In addition, as “significant infrastructure” is not (and should not be) a defined term, Genesis considers the quotation marks should be removed to avoid confusion.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.5 Strategic Direction 5 Significant and Local Infrastructure > 2.5.2 Objectives **Points: 84.7**

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

Seek amendment

Retain 2.5.2 Objectives subject to amendments below.

2.5.2 Objectives

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 **and protected** in decision making and land use planning.
2. The local and national benefits of the sustainable development, operation, maintenance and upgrading of electricity transmission and renewable electricity generation resources and activities are recognised and **encouraged achieved**.
3. Land use in the District will not adversely affect the capacity and the safe and effective functioning of nationally and regionally significant and local infrastructure required to service existing and future communities.
4. Local and national transport infrastructure located in the Taupō District operates in a safe and effective manner.

Include reason(s) for your submission point

Genesis supports 2.5.2 Objectives which appropriately recognises the strategic importance and benefits of infrastructure, including electricity infrastructure. Minor changes are suggested to strengthen the objectives.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.5 Strategic Direction 5 Significant and Local Infrastructure > 2.5.3 Policy **Points: 84.8**

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

Seek amendment

Retain 2.5.3 Policy subject to amendments below.

Amend to read as follows:

2.5.3 Policies

1. Recognise and provide for the national, regional and local benefits of renewable **energy-electricity** generation activities and resources, and transmission activities, in relation to climate change, security of supply, and social, and economic wellbeing of people and communities and for their health and safety.
2. Recognise **and provide for** the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure.
3. Subdivision, landuse and development will not adversely affect (including reverse sensitivity effects) the effective and safe functioning of infrastructure.
4. Planning and development of infrastructure will consider the needs and the wellbeing of current and future communities.
5. Recognise that infrastructure can have important environmental, economic, cultural and social effects.

Include reason(s) for your submission point

Genesis generally supports the proposed policies; however, minor changes are suggested to strengthen the provisions and to provide clarity and accuracy as outlined elsewhere in Genesis' submission.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.6 Strategic Direction 6 Natural Environment Values > 2.6.2 Objectives **Points: 84.9**

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

Retain 2.6.2 Objectives with amendments below.

2.6.2 Objectives

1. Recognise the importance of the ~~districts~~ **District's** natural values and landscapes and their significance to the Taupō ~~Districts~~ **District's** 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 on~~ Māori land ~~tenure~~, and the need to provide for the important relationship of Māori and their culture and traditions with their ancestral lands and wāahi 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.

Include reason(s) for your submission point

Genesis generally supports the proposed objectives. Minor changes are suggested for accuracy.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.6 Strategic Direction 6 Natural Environment Values > 2.6.3 Policy **Points: 84.10**

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

Retain 2.6.3 Policy subject to new clause 7 shown below:

7. Recognise the benefits of offset measures and compensation and provide for their use as feasible alternatives to manage significant residual adverse effects of renewable electricity generation activities and Regionally Significant Infrastructure.

Include reason(s) for your submission point

Genesis generally supports the proposed policies. However, in addition to minor changes suggested for accuracy, Genesis considers the potential benefits provided by offset measures and compensation should be explicitly provided for, particularly when considered against development and activities that have a wider benefit (e.g. regional, national and global) such as renewable electricity generation activities and Regionally Significant Infrastructure.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > Amendments to the Definitions of the Taupō District Plan Section 10 **Points: 84.11**

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

Amend the definition of **Rural Industry** as shown, and insert new definitions of “Renewable Electricity Generation” and “Renewable Electricity Generation Activities” (being the same definitions in the NPS-REG).

Rural Industry – 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.

Insert:

Renewable electricity generation means generation of electricity from solar, wind, hydro-electricity, geothermal, biomass, tidal, wave, or ocean current energy sources.

Renewable electricity generation activities means the construction, operation and maintenance of structures associated with renewable electricity generation. This includes small and community-scale distributed renewable generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.

Insert a new definition of “reverse sensitivity” (being the definition in the Waikato Regional Policy Statement) as follows:

-

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

Include reason(s) for your submission point

Genesis opposes the inclusion of “geothermal / electricity generation” within the definition of Rural Industry.

The proposed definition is inconsistent with the National Planning Standard 2019 (NP Standard) definition for Rural Industry, which states:

Rural industry means an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production.

Primary production is defined in the NP Standard to relate to aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities.

Geothermal and electricity generation activities do not fit within the NP Standard definition for rural industry, and should not be included as these activities do not relate to primary production.

Whilst Genesis acknowledges that the NP Standard definitions may not need to be incorporated into the Taupō District Plan until 2026, including an inconsistent definition as part of PC42 unnecessarily complicates the Plan, and hinders the efficient application of the Rural Chapter provisions.

Notwithstanding the inconsistency with the NP Standard, renewable electricity generation is an activity that has been recognised in the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG) as a matter of national significance. It is therefore inappropriate to treat that activity as part of, and in the same manner as, other activities that occur in the rural environment such as forestry, agriculture and dairy farming. The elevated status and importance of renewable electricity generation should be recognised in the Taupō District Plan with its own set of definitions, objectives, policies and methods.

Further to Genesis’ submission to the definition of Rural Industry, due to the nature of the wider submissions by Genesis, a definition for “Reverse Sensitivity” need to be included in the Taupō District Plan.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.1 Introduction

Points: 84.12

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

Seek amendment

Retain 3b.1 Introduction subject to amendments below:

General Rural Environment

The General Rural Environment is predominantly characterised by large open space and vegetated areas including productive farmland and forest, ridgelines, native bush, lakes, rivers and their margins. Other prime characteristics of the General Rural Environment are the diverse range of land uses including farming, horticulture, energy sources and plantation forestry activities, with dispersed buildings and rural roads. There is also a wide range of development associated with tourism activities, recreation, and the District is one of New Zealand’s most significant for the generation, storage and transmission of renewable electricity.

The purpose of separating the General Rural Environment from the Rural Lifestyle Environment is to preserve the productive potential of the land and other natural resources within the General Rural Environment by retaining large property sizes and limiting the extent of housing provided for. Yet allowing appropriate development to occur while preserving the 'openness' rural character of the General Rural Environment. The creation of the General Rural Environment aims to support primary productive uses, renewable electricity generation activities, and rural industry, meaning an activity being activities that directly supports, services, or is are dependent on primary production and/or have a locational or functional need to be within the General Rural Environment (rather than an urban environment).

Primary production a Activities in the General Rural Environment will produce effects that are different from urban areas, such as noise, odour, vibration, spray drift and dust. Allowing these activities to operate in a more suitable environment, along with compatible activities, aims to protect rural land uses from unnecessary restrictions.

The General Rural Environment provisions seek to limit the scale of commercial and industrial activities unless they are dependent on primary production and/or have a locational functional or operational need to be within the General Rural Environment. This is to avoid the uptake of General Rural Environment land by activities which are provided for in other Environments and may therefore impact on the land available for primary production activities within the General Rural Environment.

Rural Lifestyle Environment

The Rural Lifestyle Environment has been created to address the increasing demand for rural lifestyle living within the Rural Environment. The Rural Lifestyle Environment aims to provide for rural residential development in specific locations for those who want the benefits of rural living without necessarily undertaking a productive rural activity.

By creating separate areas in appropriate locations within the Rural Environment, the Rural Lifestyle Environment creates areas for rural living on smaller property sizes, whilst retaining separation from the rural production and other activities predominating in the General Rural Environment. This separation of activities serves to minimise reverse sensitivity issues. By concentrating rural residential development within the Rural Lifestyle Environment this serves to preserve the open space characteristics rural character and the productive potential of the rest of the Rural Environment, and to reduce the potential for land use conflict.

The Rural Lifestyle Environment will be less populated than a Residential Environment, with standards in place for minimum lot sizes to preserve the rural residential aspect of the area. Limited provision is also made for home business and commercial activity to occur, but not of a scale or extent that changes the predominantly rural residential amenity and character intended. The Rural Lifestyle Environment areas are located closer in proximity to urban areas to allow for access to community facilities within the district's townships.

Include reason(s) for your submission point

As previously identified, the TPS within the Rural Environment is also identified by the EGCS. Whilst this arrangement in the Taupō District Plan has generally served well for the TPS, in the context of the emerging climate change challenges, Genesis considers more enabling framework is necessary in the form of a dedicated Energy Chapter. Genesis understands an Energy Chapter is likely to be introduced in a future plan change as part of the Taupō District Plan review; however, as the form and timing of the new chapter is currently unknown, Genesis' submission on PC42 seeks to ensure the provisions under the Rural Environments appropriately provides for existing and new renewable electricity generation activities.

The introductory statement to Chapter 3b provides context about the nature and character of the District's rural environment, and the activities that are anticipated to occur within it.

Genesis generally supports the introductory statement but seeks minor changes to recognise the importance and functional need for renewable electricity generation to occur within the Rural Environment and its contribution to New Zealand's security of electricity supply.

These changes also reflect the need to ensure that renewable electricity generation activities are protected from potential reverse sensitivity effects (such as housing, visitor accommodation and lifestyle development both within the General Rural Environment and the new Rural Lifestyle Environment), and that if sensitive and incompatible activities do establish, they do not constrain the ability of renewable electricity generation operations to continue operating efficiently and effectively.

Genesis supports the statement about creating Rural Lifestyle Environments *"in appropriate locations within the Rural Environment"*.

Genesis also supports the statement: *"By concentrating rural residential development within the Rural Lifestyle Environment this serves to preserve the open space characteristics and productive potential of the rest of the Rural Environment, and to reduce the potential for land use conflict"*.

Genesis suggests other amendments to this section for clarity and accuracy, particularly in respect to recognise activities (including renewable electricity generation) that have a functional need to be located in the General Rural Environment.

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.2.1 Enable Primary Production **Points: 84.13**

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

Seek amendment

Retain Objective 3b.2.1 subject to amendments below.

Objective 3b.2.1 Enable Primary Production **and the Use of Natural Resources**

Primary production **and the use of natural resources** is enabled by protecting the availability of **the** rural land **and other** resources and **its** **their** productive capability.

Include reason(s) for your submission point

Genesis supports Objective 3b.2.1 with an amendment so that it covers a wider range of uses anticipated in the General Rural Environment beyond just “primary production”.

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.2.2 Maintaining the established General Rural character **Points: 84.14**

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

Oppose

Amend Objective 3b.2.2 as shown below:

Objective 3b.2.2 ~~Maintaining the established General~~ Rural character

~~The established character of the General Rural Environment is maintained and the cumulative erosion of its character through incremental subdivision and development is avoided.~~

Enable a range of productive activities in the General Rural Environment that are compatible with rural character.

Include reason(s) for your submission point

Genesis is of the view that Objective 3b.2.2 is misguided and seeks to achieve the wrong outcome. Firstly, it presupposes that the established character of the General Rural Environment represents a good environmental outcome in all respects to the extent that it should be “maintained”. Secondly, an objective that seeks to maintain the “established character” is essentially seeking no change. The proposed objective seeks to **avoid** “incremental subdivision and development” which essentially locks in the status quo and will make it difficult for any new activity to occur, including new activity that has been identified in other planning provision as being appropriately located in the General Rural Environment.

As an example, a new geothermal power station will definitely change the character of the part of the General Rural Environment in which it is proposed and ultimately constructed which is an outcome contrary to Objective 3b.2.1. The same applies for other forms of development such as the construction and operation of a dairy shed.

Genesis considers the objective should more appropriately focus on enabling activities in the General Rural Environment that are compatible in scale, amenity and character.

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: 84.15**

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

Seek amendment

Retain Objective 3b.2.3 as notified, and insert a new objective following Objective 3b.2.3 as follows:

Objective 3b.2.3 Rural industry

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

Objective 3b.2.X Renewable Electricity Generation and Transmission Activities

Enable the development, operation, maintenance and upgrading of renewable electricity generation activities and transmission activities in the General Rural Environment.

Include reason(s) for your submission point

Due to its elevated status under the NPS-REG, Genesis has sought (above) that the definition of Rural Industry be amended to delete any reference to electricity generation and that a new definition of Renewable Electricity Generation be including in the Plan. In line with that outcome, a new objective needs to be included in the Plan seeking to enable renewable electricity generation activities (and transmission activities by association).

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: 84.16**

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

Amend?

Oppose

Amend Objective 3b.2.4 as follows:

Objective 3b.2.4 Other activities

Māori cultural activities, tourism activities, ~~and~~ visitor accommodation ~~and renewable electricity generation and transmission~~ activities are enabled in appropriate locations within the General Rural Environment.

Include reason(s) for your submission point

As a consequential change to the relief sought above (inserting a new objective in relation to renewable electricity generation activities), Objective 3b.2.4 needs to be amended to remove the reference to renewable electricity generation (and transmission by association).

Visitor accommodation is a sensitive activity and should only be enabled in appropriate locations within the General Rural Environment rather than enabled anywhere including in locations whereby reverse sensitivities could arise.

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.2.5 Avoidance of reverse sensitivity **Points: 84.17**

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

Amend?

Seek amendment

Amend Objective 3b.2.5 as follows:

Objective 3b.2.5 Avoidance of reverse sensitivity

Reverse sensitivity effects on permitted, ~~and~~ legally established, and/or consented activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided.

Include reason(s) for your submission point

Genesis supports an objective in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects. However, Genesis is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already *exists*. The objective needs to also cover consented activities which have yet to be constructed / undertaken.

This objective and policy framework could allow housing to proliferation of new houses to establish in areas of the rural environment because there are few if any rural production activities operating.

The introduction of new sensitive activities into the rural environment where rural production and renewable electricity generation exist has the potential to create complaint as the two are incompatible.

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: 84.18**

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

Seek amendment

Amend Objective 3b.2.6 as follows:

Objective 3b.2.6 Impacts on infrastructure

The impacts ~~on infrastructure~~ arising from subdivision and development ~~are managed~~ do not compromise the safe and efficient functioning of infrastructure.

Include reason(s) for your submission point

Genesis considers an objective (or policy) that only seeks to “manage” something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupō District Plan.

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: 84.19**

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

Oppose

Amend Policy 3b.2.9 as follows:

Policy 3b.2.9 ~~Maintaining the established Rural~~ character

Enable activities in the ~~Maintain the established~~ General Rural Environment that will not compromise the character of the General Rural Environment, as defined by:

- a) ~~Extensive pastoral farming and forestry~~
- b) ~~Renewable electricity generation activities~~
- c) ~~Geothermal steamfields, electricity transmission and distribution~~
- ad) Large open spaces between built structures
- be) A mix of residential and rural industry buildings
- e) ~~Noises related to production activities during the day but low levels of noise at night~~
- d) ~~Low levels of light spill~~
- f) ~~Effects from activities including noise, vibration, odour and visual effects~~
- e) ~~Infrequent vehicle movements to and from a site~~
- fg) Limited signage that directly relates to the activity operating on the site.

Include reason(s) for your submission point

Genesis opposes Policy 3b.2.9 for the same reasons it opposes Objective 3b.2.2.

Genesis is of the view that Policy 3b.2.9 is misguided and seeks to achieve the wrong outcome. Firstly, it presupposes that the established character of the General Rural Environment represents a good environmental outcome in all respects to the extent that it should be “maintained”. Secondly, a policy that seeks to maintain the “established character” is essentially seeking no change.

The policy characterises the rural environment by matters such as “limited signage” whereas the existence of more than 20 large-scale renewable electricity generation activities is a far more significant and defining aspect of the General Rural Environment in the Taupō District.

Furthermore, Genesis considers other aspects of the policy need to be more realistic and not create false expectations.

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.2.10 Residential units **Points: 84.20**

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

Seek amendment

Amend Policy 3b.2.10 as follows:

Policy 3b.2.10 Residential units

Avoid the cumulative effects of rural lifestyle development by providing for these activities within the Rural Lifestyle Environment and otherwise limiting residential units within the General Rural Environment that:

- a) Increase the demand for community infrastructure and services
- b) Result in the inefficient use of land or loss of future flexibility for productive uses
- c) Erode the general rural character through its density, scale and location-
- d) Result in the potential to generate reverse sensitivity effects.
- e) Constrain the ability to access or utilise renewable energy resources.

Include reason(s) for your submission point

Genesis supports Policy 3b.2.10 but considers it needs to be expanding to address one of the most significant adverse effects that can arise as a result of residential units being established in the General Rural Environment, that being reverse sensitivity effects. The establishment of residential units should also not constrain the ability to access or utilise renewable energy resources (which are of national significance).

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: 84.21

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

Amend?

Seek amendment

Amend Policy 3b.2.12 as follows:

Policy 3b.2.12 Minor residential unit

Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and to ensure that the future availability of the rural land resource will not be compromised and to avoid the potential for reverse sensitivity effects.

Include reason(s) for your submission point

It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.

A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment.

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.2.13
Avoiding reverse sensitivity

Points: 84.22

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

Amend?

Seek amendment

Amend Policy 3b.2.13 as follows:

Policy 3b.2.13 Avoiding reverse sensitivity

Any adverse effects generated by an new sensitive activity must be managed within the allotment so as to avoid adversely affecting reverse sensitivity effects on permitted, and lawfully established and/or consented neighbouring activities.

Include reason(s) for your submission point

Genesis supports a policy in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects.

Genesis seeks an amendment to the policy for the same reasons set out in relation to the changes sought to Objective 3b.2.5.

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: 84.23

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

Seek amendment

Amend Policy 3b.2.14 as follows:

Policy 3b.2.14 Commercial and industrial activity

Limit the scale of commercial and industrial activity ([excluding renewable electricity generation activities](#)) to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary production [and other](#) activities [provided for](#) within the General Rural Environment.

Include reason(s) for your submission point

Genesis notes that as renewable electricity generation activities fall within the definition of industrial activities, they need to be excluded from the first part of the policy which seeks to limit commercial and industrial activities.

Genesis supports the intent of the policy but considers it needs to be widened to cover other activities (including renewable electricity generation activities) that are provided for and anticipated in the General Rural Environment beyond just primary production.

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.2.15 Allotment size

Points: 84.24

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

Support

Retain Policy 3b.2.15 as notified.

Include reason(s) for your submission point

Genesis supports Policy 3b.2.15 on the basis that it reinforces the intent that the General Rural Environment is for larger scale productive activities (rather than rural residential opportunities).

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: 84.25

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

Oppose

Delete Objective 3b.3.1 and replace it with the following:

Objective 3b.3.1 Maintain the character of the Rural Lifestyle Environment

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

[Objective 3b.3.1 Enable Rural Residential Activities](#)

[Zone parts of the Rural Environment as Rural Lifestyle Environment to enable and provide for rural residential activities in appropriate locations where they will not give rise to reverse sensitivity effects on the surrounding General Rural Environment or Industrial Environments.](#)

Include reason(s) for your submission point

It is assumed that this objective relates to activities within the Rural Lifestyle Environment (if it is intended to control activities in the surrounding General Rural Environment, then the objective is in the wrong section of the Plan).

This is an unexpected objective for the parts of the Rural Environment where a greater density of subdivision and development is anticipated and provided for. The objective should focus on enabling rural residential opportunities in appropriate locations (i.e. where they will not create reverse sensitivity effects on activities in the wider General Rural Environment or Industrial Environments).

If Rural Lifestyle Environment are proposed in inappropriate locations (and no decision is made to amend that situation), it forces Genesis (and other parties) to seek to amend the rules and performance standards within the Rural Lifestyle Environment as an alternative means to avoid the creation of reverse sensitivity effects. It is preferable that only appropriate locations are zoned Rural Lifestyle Environment whereby activities occurring within those zones do not need to be constrained by way of the rules and performance standards.

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: 84.26**

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

Amend Objective 3b.3.2 as follows:

Objective 3b.3.2 Avoid reverse sensitivity

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

Include reason(s) for your submission point

Genesis supports an objective in the Rural Lifestyle Environment chapter that seeks to avoid reverse sensitivity effects. However, Genesis is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already *exists*. The objective needs to also cover consented activities which have yet to be constructed / undertaken.

This objective and policy framework could allow housing to proliferation of new houses to establish in areas of the rural environment because there are few if any rural production activities operating.

The introduction of new sensitive activities into the rural environment where rural production and renewable electricity generation exist has the potential to create complaint as the two are incompatible.

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: 84.27**

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

Amend Objective 3b.3.3 as follows:

Objective 3b.3.3 Commercial and industrial activities

The establishment of commercial and industrial activities that have no functional need to locate and are incompatible with the rural residential activities occurring within the Rural Lifestyle Environment are avoided.

Include reason(s) for your submission point

Genesis supports Objective 3b.3.3 but it needs to be more precisely drafted for accuracy and clarity.

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.3.4 Consolidate rural lifestyle activities **Points: 84.28**

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

Retain Objective 3b.3.4.

Include reason(s) for your submission point

Genesis supports the consolidation of Rural Lifestyle activities within identified and appropriately located Rural Lifestyle Environments.

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: 84.29**

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

Amend?

Oppose

Amend Objective 3b.3.6 as follows:

Objective 3b.2.6 Impacts on ~~community~~ infrastructure

The impacts ~~on community infrastructure~~ arising from subdivision and development ~~are managed~~ do not compromise the safe and efficient functioning of infrastructure.

Include reason(s) for your submission point

An objective (or policy) that only seeks to “manage” something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupō District Plan.

The objective should apply to all infrastructure, not just community infrastructure.

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: 84.30**

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

Amend?

Seek amendment

Add a new point i) to Policy 3b.3.9 as follows:

Policy 3b.3.9 Character of the Rural Lifestyle Environment

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

- a) Buildings on different sites are separated from each other in a way that creates a sense of privacy.
- b) Accessory buildings that do not dominate the landscape.
- c) Dwellings may be large but are surrounded by open space and do not dominate the landscape.
- d) A general absence of urban infrastructure including community stormwater and wastewater services.
- e) An environment which includes residential activities, rural productive activities and home business activities.
- f) Noise related to production activities during the day but low levels of noise at night.
- g) Low levels of light spill.
- h) Limited signage that directly relates to the activity operating on the site.

i) An environment that is surrounded by a working rural environment including rural production, geothermal steamfields and renewable electricity generation activities.

Include reason(s) for your submission point

Genesis supports Policy 3b.3.9 but considers it also needs to recognise, and not have adverse effects on, the nature of the surrounding General Rural Environment.

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.3.10 Lot sizes and setbacks for allotments adjoining the General Rural Environment **Points: 84.31**

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

Amend?

Support

Retain Policy 3b.3.10 as notified.

Include reason(s) for your submission point

Requiring larger lot sizes and greater building setbacks for new dwellings within the Rural Lifestyle Environment are two key methods for managing reverse sensitivity effects. Genesis therefore supports this policy on this basis.

However, Genesis reiterates that these two measures alone will not always avoid the potential for reverse sensitivity effects (which is what new Objective 3b.3.2 requires), and this needs to be reflected across several policies within this sub-chapter. See the relief sought in relation to other objectives and policies.

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.3.12 Minor residential unit **Points: 84.32**

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

Seek amendment

Amend Policy 3b.3.12 as follows:

Policy 3b.3.12 Minor residential unit

Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, ~~and~~ to further protect the character of the ~~R~~Rural Lifestyle Environment ~~and to avoid reverse sensitivity effects~~.

Include reason(s) for your submission point

A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment.

It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.

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.1.1 Activities in the General Rural Environment **Points: 84.33**

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

Support

Retain Rule 4b.1.1 as notified.

Include reason(s) for your submission point

Genesis supports Rule 4b.1.1 on the basis that it is consistent with the approach throughout the rest of the Plan, is effects based, and enables activities to occur that do not need to be the subject of a resource consent application process.

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: 84.34**

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

Seek amendment

Retain Rule 4b.1.2 subject to the amendments below.

f. The ability to ~~mitigate avoid~~ adverse effects, ~~including reverse sensitivity effects~~, through the use of screening, planting, landscaping, ~~and~~ alternative design, ~~and/or other means including restrictive covenants~~.

-

i. The potential to constrain access to and/or the utilisation of renewable energy sources.

Include reason(s) for your submission point

Minor residential units are sensitive activities whereby their establishment needs to be controlled so as to not result in reverse sensitivity effects. The relevant matters of discretion should therefore consider any potential for reverse sensitivity effects. An additional criterion is also suggested to ensure that minor residential units do not constrain access to and/or the utilisation of renewable energy sources.

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.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Steamfields **Points: 84.35**

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

Amend?

Seek amendment

Amend Rule 4b.1.4 as follows:

4b.1.4 Electricity Generation Core Sites, Renewable Energy Electricity Generation Activities and Geothermal Steamfields Areas

i. Any activity involving continued operation, maintenance and minor upgrading of existing electricity generation core sites, geothermal steamfields areas, renewable energy electricity generation activities and associated structures and ancillary activities is a **permitted activity**.

NOTE: For the purpose of this rule “maintenance” means:

All activities associated with the protective care, and monitoring of a hydro dam, a geothermal or hydroelectric power station, geothermal steamfields and associated structures, in order to monitor, testing and/or arresting the processes of decay, structural fatigue, erosion or dilapidation of all associated structures and includes maintenance of surrounds and water areas.

NOTE: For the purpose of this rule “minor upgrading” means:

Structural improvement, repair and replacement or upgrade of components, or activities required for the continued safe and efficient operation including worn or technically deficient parts of any structure including the powerhouse, hydro dams, separation plants, switchyards, intake, control and diversion structures, wells, pipes, tunnels, cables, other equipment and accessory buildings and structures of similar character and scale, and includes associated drilling, vehicles, infrastructure, machinery, testing, monitoring, earthworks and vegetation removal. Also the extension to existing Buildings and Structures, and the erection of new Buildings and Structures up to 100m² in area and not exceeding the maximum height standard for the Rural Environment and the erection of any aerial, antennae or communication dish not exceeding 5m² in area located on top of a hydro or geothermal existing structure, subject to compliance with the Noise Performance Standard.

Include reason(s) for your submission point

Genesis supports the retention of Rule 4b.1.4 (being a continuation of the Rule in currently in the Rural Environment) with a number of minor amendments. This is the enabling rule that appropriately provides for renewable electricity generation activities in the General Rural Environment.

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: 84.36**

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

Amend?

Seek amendment

Retain Rule 4b.1.5 subject to the amendments below.

i. A commercial, industrial activity or home business which complies with the performance standards is a **permitted activity**.

ii. A commercial, industrial activity or home business which does not comply with the performance standards is a **restricted discretionary activity**.

When considering activities under Rule 4b.1.5ⁱⁱ Council restricts the exercise of its discretion to the following matters:

c. The effect of the activity on surrounding land uses ([including reverse sensitivity effects](#)) and how these effects can be managed onsite and/or mitigated.

Include reason(s) for your submission point

As home businesses could include sensitive activities, Genesis considered there is a need to avoid creating reverse sensitivity effects which should be a matter of discretion.

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.1.7 High voltage transmission lines

Points: 84.37

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

Delete? Amend?

Seek amendment

Retain Rule 4b.1.7 subject to the amendments shown:

4b.1.7 [Buildings and structures in proximity to High](#) high voltage transmission lines

i. Any building [or structure](#) (except network utilities [or renewable electricity generation activities](#)) located within 0 – 12 meters 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:

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

Include reason(s) for your submission point

Genesis supports this rule as it seeks to ensure the safe operation of transmission lines. However the heading of the rule needs to be more accurate and the rule needs to provide for renewable electricity generation activities (new definition included, which includes maintenance activities) which, by nature of the activity, are connected to the high-voltage network.

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.1.8 Buildings within Outstanding Landscape Areas

Points: 84.38

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

Amend?

Seek amendment

Retain Rule 4b.1.8 but amend the first exception to the rule as follows:

- i. Provided that the activity has not been identified as a discretionary or non-complying activity by another rule in the Plan, within an Outstanding Landscape Area, the erection of structures:
 - a. Between 5m and 10m in height; or
 - b. For Masts and Poles between 5m and 20m in height; or
 - c. Which are between 250m² and 1,000m² in ground floor area, and have an aggregate coverage less than 2.5% of the allotment

is a **restricted discretionary activity**.

EXCEPTION: This rule will not apply to the erection of structures:

- a. [Associated with existing renewable electricity generation activities including Ww](#) within Electricity Generation Core Sites.
- b. For the purpose of papakāinga.
- c. Within any Māori Reservation established under the Te Ture Whenua Māori Act 1993/ Māori Lands Act 1993 for the purposes of a village site, marae, scenic interest and/or wildlife protection

Include reason(s) for your submission point

Genesis supports this rule on the basis that it does not apply to buildings within Electricity Generation Core Sites. However, Genesis considers the exception should be broadened to include all other existing renewable electricity generation activities.

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.1.9 Earthworks within Outstanding Landscape Areas **Points: 84.39**

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

Seek amendment

Retain Rule 4b.1.9 but amend the exception to the rule as follows:

Earthworks within an Outstanding Landscape Area that creates a new cut face or fill that is in excess of 1.5 metres in height, or cumulative vertical ground alteration in excess of 3.0 metres over a 12 month period, is a **restricted discretionary activity**, provided that any exposed cut or fill face located in vegetation of a height 1.5 metres or less is revegetated not later than the next growing season. Revegetation should consist of indigenous species or the same or similar species (other than pest species) present on the site prior to earthworks).

EXCEPTION:

This rule will not apply to Earthworks associated with existing and consented renewable electricity generation activities including within Electricity Generation Core Sites.

Include reason(s) for your submission point

Genesis supports this rule on the basis that it does not apply to earthworks within Electricity Generation Core Sites. However, Genesis considers the exception should be broadened to include all other existing renewable electricity generation activities.

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: 84.40**

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

Seek amendment

Retain 4b.2.1 subject to the amendment below.

- i. 200 'equivalent vehicle movements' per day for the allotment.
- ii. Papakāinga - 100 'equivalent vehicle movements' per day for the allotment or 24 per dwelling, whichever is the greater.

EXCEPTION:

This performance standard shall not apply to traffic movements involved in forest harvesting operations or existing and/or consented renewable electricity generation activities.

Include reason(s) for your submission point

Genesis supports Rule 4b.2.1 subject to the exception being expanded to include renewable electricity generation activities.

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: 84.41**

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

Support

Retain 4b.2.9 as notified.

Include reason(s) for your submission point

Genesis support performance standard 4b.2.9 as it retains the existing provision in the District Plan.

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.2.10 Maximum Noise - Construction Noise **Points: 84.42**

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

Support

Retain 4b.2.10 as notified.

Include reason(s) for your submission point

Genesis supports performance standard 4b.2.10 as the New Zealand Standard for construction noise is a well understood standard.

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.2.11 Maximum Noise - Electricity Generation Core Sites **Points: 84.43**

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

Support

Retain 4b.2.11 as notified.

Include reason(s) for your submission point

Genesis supports performance standard 4b.2.11 as it retains the existing provision in the District Plan.

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.2.13 Maximum Noise - Other **Points: 84.44**

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

Seek amendment

Amend Rule 4b.2.13 as follows:

4b.2.13 Maximum Noise – Other

- i. Nothing in the foregoing Performance Standards shall apply to farm animals including working dogs, and to agricultural and forestry vehicles, agricultural and forestry machinery or equipment (including mobile plant at produce packing facilities but excluding sawmilling equipment), operated and maintained in accordance with the manufacturer's specifications in accordance with accepted management practices (e.g. for milking, spraying, harvesting, packing, forest harvesting and the like). Provided that the activity shall comply with the requirements of S16 of the Resource Management Act 1991
- ii. Nothing in the foregoing Performance Standards shall apply to sirens, circuit breakers, [bursting discs](#), [emergency or upset operating conditions](#) and hydro spills associated with the operation of [Renewable Electricity Generation Activities Core sites](#). Provided that the activity shall comply with the requirements of S16 of the Resource Management Act 1991.

Include reason(s) for your submission point

Genesis supports this rule subject to minor amendments to ensure it applies to all applicable circumstances.

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: 84.45

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

Seek amendment

Amend Rule 4b.5.3 as follows:

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**.

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:

...

i) Any effects on the functioning of the Rural Environment including adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources.

Include reason(s) for your submission point

Genesis supports this rule with the inclusion of an additional matter over which control is reserved for controlled activities.

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

Points: 84.46

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

Seek amendment

Genesis seeks the relief set out under each relevant provision.

To the extent that any of the relief sought is not accepted, Genesis seeks any alternative relief which will have the same or similar effect.

Include reason(s) for your submission point

The Tongariro Power Scheme (TPS) within the Rural Environment is identified by the Electricity Generation Core Site (EGCS). Whilst this arrangement in the Taupō District Plan has generally served well for the TPS, in the context of the emerging climate change challenges, Genesis considers more enabling framework is necessary in the form of a dedicated Energy Chapter. Genesis understands an Energy Chapter is likely to be introduced in a future plan change as part of the Taupō District Plan review; however, as the form and timing of the new chapter is currently unknown, Genesis' submission on PC42 seeks to ensure the provisions under the Rural Environments appropriately provides for existing and new renewable electricity generation activities.

In addition, Genesis generally supports the creation of the Rural Lifestyle Environment on the basis that they can provide for rural residential activities in appropriate locations, which do not include within or in close proximity to permitted, lawfully existing and/or consented renewable electricity generation activities. If Rural Lifestyle Environments are only located in appropriate locations, that outcome avoids the need for Genesis (and others) to seek changes to the rules and performance standards relating to the Rural Lifestyle Environment to avoid reverse sensitivity effects. That is the approach taken in this submission where amendments are focused on the proposed objectives and policies. If Genesis' relief sought in relation to the

Rural Lifestyle Environment provisions are not accepted, Genesis may seek alternative relief (including additional changes to the rules and performance standards relating to the Rural Lifestyle Environment) to avoid the creation of reverse sensitivity effects.

Provision: Plan Change 38 - Strategic Directions

Points: 84.47

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

Seek amendment

Include an Energy Chapter in the Taupō District Plan in accordance with the National Planning Standards, either as a result of Plan Change 38 or by way of a subsequent Proposed Plan Change in the near future.

Include reason(s) for your submission point

In addition to the detailed relief sought under the provisions, Genesis seeks the inclusion of an Energy Chapter in the Taupō District Plan in accordance with the National Planning Standards, either as a result of Plan Change 38 or by way of a subsequent Proposed Plan Change in the near future. There are more than 20 power stations in the Taupō District making renewable electricity generation one of the most significant activities in the Taupō District. The ongoing operation of existing renewable electricity generation activities and the development of additional renewable electricity generation capacity is one of the most important resource management issues facing the country (and the planet) in order to address climate change by decarbonising the economy.

Attached Documents

File
221209 Taupo PC38-43 Genesis Energy submission



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Submission on Plan Changes 38 – 43 to the Taupō District Plan

Genesis Energy Ltd (**Genesis**) welcomes the opportunity to submit on Proposed Plan Changes 38 to 43 to the Taupō District Plan.

About Genesis

Genesis owns and operates the Tongariro Power Scheme (**TPS**, the **Scheme**). The Scheme comprises three hydro power stations – Rangipo (120MW, underground), Tokaanu (240MW) and Mangaio (1.8MW) and has a catchment area of more than 2,600km² in the North Island's central volcanic plateau. The Scheme gathers water from the mountains of the central plateau through the Eastern and Western Diversions. Water passes through a series of pipes, lakes, canals, and tunnels to the Mangaio, Tokaanu and Rangipo hydro power stations before entering Lake Taupō, where the water is utilised again for the generation of renewable electricity via the Waikato Hydro System.

The Eastern Diversion, part of the Western Diversion, and all three power stations are located in the Taupō District under the General Rural Environment and the Electricity Generation Core Site (**EGCS**). The generation and supply of electricity from the TPS is critical at both national and regional levels, with the TPS generating approximately 1,300 GWh annually – the equivalent to the annual electricity usage by approximately 168,000 households. The national significance of the TPS is recognised in the National Policy Statement for Renewable Electricity Generation (**NPSREG**) and the National Policy Statement for Freshwater Management 2020 (**NPSFM**). The recognition of the five large hydro schemes in the NPSFM highlights the important role played by renewable electricity generation (**REG**) in decarbonising New Zealand and achieving our goals in greenhouse gas emissions reduction to address the climate change crisis.

Genesis is committed to empowering New Zealand’s sustainable future, and to help the move to a low-carbon future, powered by renewable energy. The Genesis Future-gen programme is the lens we are using to identify opportunities to decarbonise New Zealand’s energy sector while continuing to supply reliable, affordable electricity. Within the Taupō District, in addition to ensuring the ongoing operation of the TPS, we are continuing to assess new opportunities for renewable generation to utilise the abundance of resources within the district. It is with this setting that Genesis’ submission on Plan Changes 38 and 42 to the Taupō District Plan is made.

General Submission

In addition to the detailed submissions, Genesis seeks the inclusion of an Energy Chapter in the Taupō District Plan in accordance with the National Planning Standards, either as a result of Plan Change 38 or by way of a subsequent Proposed Plan Change in the near future. There are more than 20 power stations in the Taupō District making renewable electricity generation one of the most significant activities in the Taupō District. The ongoing operation of existing renewable electricity generation activities and the development of additional renewable electricity generation capacity is one of the most important resource management issues facing the country (and the planet) in order to address climate change by decarbonising the economy.

As previously identified, the TPS within the Rural Environment is identified by the EGCS. Whilst this arrangement in the Taupō District Plan has generally served well for the TPS, in the context of the emerging climate change challenges, Genesis considers more enabling framework is necessary in the form of a dedicated Energy Chapter. Genesis understands an Energy Chapter is likely to be introduced in a future plan change as part of the Taupō District Plan review; however, as the form and timing of the new chapter is currently unknown, Genesis’ submission on Plan Change 42 seeks to ensure the provisions under the Rural Environments appropriately provides for existing and new renewable electricity generation activities.

In addition, Genesis generally supports the creation of the Rural Lifestyle Environment on the basis that they can provide for rural residential activities in appropriate locations, which do not include within or in close proximity to permitted, lawfully existing and/or consented renewable electricity generation activities. If Rural Lifestyle Environments are only located in appropriate locations, that outcome avoids the need for Genesis (and others) to seek changes to the rules and performance standards relating to the Rural Lifestyle Environment to avoid reverse sensitivity effects. That is the approach taken in this submission where amendments are focused on the proposed objectives and policies. If Genesis’ relief sought in relation to the Rural Lifestyle Environment provisions are not accepted, Genesis may seek alternative relief (including additional changes to the rules and performance standards relating to the Rural Lifestyle Environment) to avoid the creation of reverse sensitivity effects.

Relief Sought

In addition to the detailed submissions, include an Energy Chapter in the Taupō District Plan in accordance with the National Planning Standards, either as a result of Plan Change 38 or by way of a subsequent Proposed Plan Change in the near future.

Genesis wishes to be heard in support of this submission.

Genesis could not gain an advantage in trade competition through this submission.

If others make a similar submission, Genesis would consider presenting a joint case with them at any hearing.

If you have any queries in relation to this feedback, please contact Alice Lin on email Alice.Lin@genesisenergy.co.nz or phone 021 022 11 943.

Nakū noa, nā

A handwritten signature in black ink that reads "Alice Barnett". The signature is written in a cursive, slightly stylized font.

Alice Barnett
Environmental Policy and Planning Manager



First name: Sophie
Last name: Andrews

On behalf of:
 Ministry of Education

Postal address: PO Box 903
Suburb:
City: Tauranga
Country: New Zealand
Postcode: 3144

Email: sophie.andrews@beca.com

Daytime Phone: +64 7 578 0896

- 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 38 - Strategic Directions

Points: 85.1

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

Support

Include reason(s) for your submission point

Please see attached submission

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

Points: 85.2

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

Please see attached submission

Attached Documents

File
Taupo District Plan Changes 38-43 Review

FORM 5

Submission on a publicly notified proposal for policy statement or plan, change or variation under Clause 6 of Schedule 1, Resource Management Act 1991

To: Taupō District Council

Name of submitter: Ministry of Education Te Tāhuhu o Te Mātauranga ('the Ministry')

Address for service: Eden 5, Level 3/12-18 Normanby Road
Mount Eden
Auckland 1011

Attention: Gemma Hayes

Phone: (09) 638 0294

Email: Gemma.hayes@education.govt.nz

This is a submission on the Draft Taupō District Plan - Plan Changes 38 - 43 (the Plan Changes).

Introduction/Background

Thank you for the opportunity to provide feedback on the Plan Changes above. The Ministry is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has a responsibility not only for all State schools owned by the Crown, but also those State schools that are not owned by the Crown, such as designated character schools and State Integrated schools. For the Crown owned State school this involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing. The Ministry is therefore a considerable stakeholder in terms of activities that may impact on existing and future educational facilities and assets in the Taupō District.

The Ministry's feedback is:

The Ministry has a particular interest in the parts of the Plan Changes that, either directly or indirectly, have the potential to impact on the Ministry's interests such as the management and operation of existing educational facilities or the establishment of new educational facilities.

The Ministry acknowledges that Taupō District Council have been and will continue to be consulting on the District Plan review in different bundles. The Ministry provided feedback on the first draft bundle and have taken this into account when submitting on the second proposed bundle.

The provisions that most directly impact on the Ministry within this bundle are in the Rural Environment chapter. Details of the Ministry's submission is outlined in Appendix 1 to this submission. The following general comments have been made on the Plan Changes.

Strategic Directions

The Urban Form and Development strategic direction section states that the Taupō District's growing population has led to increased demand on infrastructure. This will include additional pressure on social infrastructure, such as education facilities, as demand increases as a result of residential growth.

The Ministry provided feedback to Taupō District Council on the Draft Taupō District Plan Changes in June 2022. All of the feedback provided on the new Strategic Directions chapter was accepted and included in the updated Plan Change 38 document. The Ministry supports the adoption of these changes.

Rural Environment

The Ministry provided feedback to Taupō District Council on the Draft Taupō District Plan Changes in June 2022. The feedback provided by the Ministry on the Rural Environment chapter was rejected and has not been updated in this proposed plan change bundle. The matters rejected related to providing for educational facilities in rural areas.

The Ministry has an obligation to provide educational facilities to support the needs and demands of rural communities. The Rural Environments Chapter currently does not provide for educational facilities and was not updated following the feedback provided by the Ministry in relation to this matter in the draft.

The Ministry draws Council's attention to their obligation under the National Policy Statement for Urban Development 2020 (NPS-UD) to ensure sufficient additional infrastructure (which includes educational facilities) is provided in development areas (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular). The Ministry considers that enabling provisions for educational facilities in the rural zone will assist council in achieving this outcome to support existing and growing rural communities. Rural schools, kura, early childhood education centres and training centres are examples of educational facilities which exist and are required in rural areas across New Zealand.

Decision sought

The specific amendments, additions or retentions to the Plan sought by the Ministry are listed in Appendix 1 to this submission with ~~strikethrough~~ and underline.

Overall, the Ministry is neutral on this bundle of plan changes if Council accepts the following relief and any consequential amendments required to give effect to the matters raised in this submission.

The Ministry wishes to be heard in support of its submission.

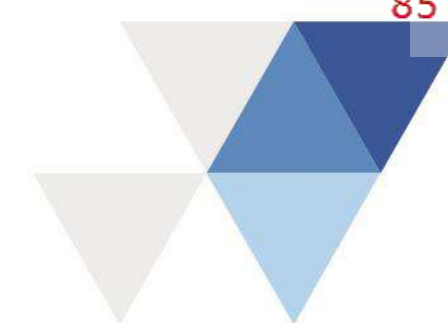
Gemma Hayes

Principal Planning Advisor - Natural & Built Environments
Te Puna Hanganga, Matihiko | Infrastructure & Digital
Date: 3 March 2023

Appendix 1: Ministry of Education feedback on the draft Taupō District Plan Changes					
ID	Section of Plan	Current Draft Provision	Support/ Oppose/ Neutral/ New Provision	Reason	Relief Sought
Strategic Direction chapter					
1.	2.3 Strategic Direction 3	Urban form and Development The Taupō Districts diverse and growing population has led to increased demand for housing and demand for new commercial and industrial areas. Urban development also generates further demand for infrastructure services, particularly development infrastructure such as three waters and transportation services. The District Plan provides a framework for ensuring that urban development, subdivision and changes in land use occurs in a planned and efficient manner and is adequately serviced by infrastructure (including development and additional infrastructure).	Support	The Ministry supports this opening statement as it recognises the need for development to be adequately serviced by additional infrastructure (which includes schools). This wording of this opening statement is in line with the Ministry's feedback in June 2022 to enable educational facilities.	Retain as proposed
2.	2.3.2 Objective 3	Subdivision, use and development of land which will have demonstrable social and cultural benefits to the district's community will be supported.	Support	The Ministry supports this objective as it recognises the need for development that provides social benefits to the district's community (which includes schools). This wording of this objective is in line with the Ministry's feedback in June 2022 to enable educational facilities.	Retain as proposed
3.	2.3.3 Policy 5	Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure (including development and additional infrastructure), according to the capacity limitations of that infrastructure.	Support	The Ministry supports this policy as it recognises the need for development to be adequately serviced by additional infrastructure (which includes schools). This wording of this policy is in line with the Ministry's feedback in June 2022 to enable educational facilities.	Retain as proposed
Rural Environment					
4.	Objective 3b.2.6	Impacts on infrastructure The impacts on infrastructure arising from subdivision and development are managed.	Support in part	The Ministry agree that impacts arising from subdivision and development should be managed. Under the NPS-UD, educational facilities are included in the definition of 'additional infrastructure'. Therefore, the Ministry request the inclusion of 'additional infrastructure' to recognise the impacts subdivision and development can have on the Ministry's school network.	The impacts on infrastructure <u>(including additional infrastructure)</u> arising from subdivision and development are managed.
5.	Objective 3b.3.6	Impacts on community infrastructure The impacts on community infrastructure arising from subdivision and development are managed.	Support in part	The Ministry agree that impacts on community infrastructure arising from subdivision and development should be managed. Under the NPS-UD, educational facilities are included in the definition of 'additional infrastructure'. Therefore, the Ministry request the inclusion of 'additional infrastructure' to recognise the impacts subdivision and development on its school network.	The impacts on community <u>and additional</u> infrastructure arising from subdivision and development are managed.



Appendix 1: Ministry of Education feedback on the draft Taupō District Plan Changes					
ID	Section of Plan	Current Draft Provision	Support/ Oppose/ Neutral/ New Provision	Reason	Relief Sought
Strategic Direction chapter					
1.	2.3 Strategic Direction 3	<p>Urban form and Development</p> <p>The Taupō Districts diverse and growing population has led to increased demand for housing and demand for new commercial and industrial areas. Urban development also generates further demand for infrastructure services, particularly development infrastructure such as three waters and transportation services. The District Plan provides a framework for ensuring that urban development, subdivision and changes in land use occurs in a planned and efficient manner and is adequately serviced by infrastructure (including development and additional infrastructure).</p>	Support	The Ministry supports this opening statement as it recognises the need for development to be adequately serviced by additional infrastructure (which includes schools). This wording of this opening statement is in line with the Ministry's feedback in June 2022 to enable educational facilities.	Retain as proposed
2.	2.3.2 Objective 3	Subdivision, use and development of land which will have demonstrable social and cultural benefits to the district's community will be supported.	Support	The Ministry supports this objective as it recognises the need for development that provides social benefits to the district's community (which includes schools). This wording of this objective is in line with the Ministry's feedback in June 2022 to enable educational facilities.	Retain as proposed
3.	2.3.3 Policy 5	Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure (including development and additional infrastructure), according to the capacity limitations of that infrastructure.	Support	The Ministry supports this policy as it recognises the need for development to be adequately serviced by additional infrastructure (which includes schools). This wording of this policy is in line with the Ministry's feedback in June 2022 to enable educational facilities.	Retain as proposed
6.	Policy 3b.2.9	<p>Maintaining the established character</p> <p>Maintain the established General Rural Environment character, as defined by:</p> <ul style="list-style-type: none"> a) Large open spaces between built structures b) A mix of residential and rural industry buildings c) Noises related to production activities during the day but low levels of noise at night d) Low levels of light spill. e) Infrequent vehicle movements to and from a site f) Limited signage that directly relates to the activity operating on the site. 	Support in part	<p>The Ministry recognises the importance of maintaining rural character and amenity. Educational facilities are required to support rural communities and as such are part of the rural character. Therefore, the Ministry requests the inclusion of 'additional infrastructure' (as defined by the NPS-UD) to Policy 3b.2.9.</p> <p>The Ministry understands that council are of the opinion that the Ministry do not need enabling provisions for educational facilities, as the Ministry is a requiring authority and can establish schools through the Notice of Requirements (NoR) Process. However, the NoR process leans heavily on the policy framework. Therefore, if there are no enabling objectives and policies to tell the decision makers that schools are required to support rural communities, the NoR process can become challenging. Educational facilities are a crucial form of social infrastructure that support the social and economic wellbeing of all communities (including rural communities). The Ministry understands council are concerned</p>	<p>Maintaining the established character</p> <p>Maintain the established General Rural Environment character, as defined by:</p> <ul style="list-style-type: none"> a) Large open spaces between built structures b) A mix of residential and rural industry <u>buildings and buildings containing education facilities.</u> c) Noises related to production activities during the day but low levels of noise at night d) Low levels of light spill. e) Infrequent vehicle movements to and from a site f) Limited signage that directly relates to the activity operating on the site.



Appendix 1: Ministry of Education feedback on the draft Taupō District Plan Changes					
ID	Section of Plan	Current Draft Provision	Support/ Oppose/ Neutral/ New Provision	Reason	Relief Sought
Strategic Direction chapter					
1.	2.3 Strategic Direction 3	<p>Urban form and Development</p> <p>The Taupō Districts diverse and growing population has led to increased demand for housing and demand for new commercial and industrial areas. Urban development also generates further demand for infrastructure services, particularly development infrastructure such as three waters and transportation services. The District Plan provides a framework for ensuring that urban development, subdivision and changes in land use occurs in a planned and efficient manner and is adequately serviced by infrastructure (including development and additional infrastructure).</p>	Support	The Ministry supports this opening statement as it recognises the need for development to be adequately serviced by additional infrastructure (which includes schools). This wording of this opening statement is in line with the Ministry's feedback in June 2022 to enable educational facilities.	Retain as proposed
2.	2.3.2 Objective 3	Subdivision, use and development of land which will have demonstrable social and cultural benefits to the district's community will be supported.	Support	The Ministry supports this objective as it recognises the need for development that provides social benefits to the district's community (which includes schools). This wording of this objective is in line with the Ministry's feedback in June 2022 to enable educational facilities.	Retain as proposed
3.	2.3.3 Policy 5	Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure (including development and additional infrastructure), according to the capacity limitations of that infrastructure.	Support	The Ministry supports this policy as it recognises the need for development to be adequately serviced by additional infrastructure (which includes schools). This wording of this policy is in line with the Ministry's feedback in June 2022 to enable educational facilities.	Retain as proposed
7.	Policy 3b.3.9	<p>Character of the Rural Lifestyle Environment</p> <p>Manage the anticipated character of the Rural Lifestyle Environment as defined by:</p> <ul style="list-style-type: none"> a) Buildings on different sites are separated from each other in a way that creates a sense of privacy. b) Accessory buildings that do not dominate the landscape. c) Dwellings may be large but are surrounded by open space and do not dominate the landscape. d) A general absence of urban infrastructure including community stormwater and wastewater services. e) An environment which includes residential activities, rural productive activities and home business activities. f) Noise related to production activities during the day but low levels of noise at night. g) Low levels of light spill. h) Limited signage that directly relates to the activity operating on the site. 	Support in part	<p>about reverse sensitive effects of schools establishing around rural activities. This can be managed through appropriate matters of discretion and assessment criteria. The Ministry would like to work with Taupō District Council to form an agreed assessment criteria and policy framework that would manage these effects appropriately and would ensure all rural communities have adequate access to education.</p> <p>Furthermore, locating educational facilities in rural communities reduces traffic and contributes to lower carbon emissions, as children do not have to travel into town centres to go to school.</p> <p>There are 5 existing schools in the Taupō District rural environment. These schools provide essential education opportunities for residents in the rural environment across the district, therefore contributing to the character of the general rural environment and anticipated rural lifestyle environment.</p> <p>The character of the rural environment should also recognise the assumptions made in the valuing of 'rural' activities. The current character outlined in the policy does not include consideration of Te Ao Māori world view and the uses and opportunities that should be provided in the rural zone, when considering the provisions of section 6(e) of the RMA.</p> <p>The Ministry considers that the rural zone should provide for schools and kura where they need to be located to address an educational need and are located in an area that reflects the relationship Māori have with that land in accordance with section 6(e) of the RMA.</p>	<p>Character of the Rural Lifestyle Environment</p> <p>Manage the anticipated character of the Rural Lifestyle Environment as defined by:</p> <ul style="list-style-type: none"> a) Buildings on different sites are separated from each other in a way that creates a sense of privacy. b) Accessory buildings that do not dominate the landscape. c) Dwellings may be large but are surrounded by open space and do not dominate the landscape. d) A general absence of urban infrastructure including community stormwater and wastewater services. e) An environment which includes residential activities, education facilities, rural productive activities and home business activities. f) Noise related to production activities during the day but low levels of noise at night. g) Low levels of light spill. h) Limited signage that directly relates to the activity operating on the site.



Appendix 1: Ministry of Education feedback on the draft Taupō District Plan Changes					
ID	Section of Plan	Current Draft Provision	Support/ Oppose/ Neutral/ New Provision	Reason	Relief Sought
Strategic Direction chapter					
		Urban form and Development			
1.	2.3 Strategic Direction 3	The Taupō Districts diverse and growing population has led to increased demand for housing and demand for new commercial and industrial areas. Urban development also generates further demand for infrastructure services, particularly development infrastructure such as three waters and transportation services. The District Plan provides a framework for ensuring that urban development, subdivision and changes in land use occurs in a planned and efficient manner and is adequately serviced by infrastructure (including development and additional infrastructure).	Support	The Ministry supports this opening statement as it recognises the need for development to be adequately serviced by additional infrastructure (which includes schools). This wording of this opening statement is in line with the Ministry's feedback in June 2022 to enable educational facilities.	Retain as proposed
2.	2.3.2 Objective 3	Subdivision, use and development of land which will have demonstrable social and cultural benefits to the district's community will be supported.	Support	The Ministry supports this objective as it recognises the need for development that provides social benefits to the district's community (which includes schools). This wording of this objective is in line with the Ministry's feedback in June 2022 to enable educational facilities.	Retain as proposed
3.	2.3.3 Policy 5	Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure (including development and additional infrastructure), according to the capacity limitations of that infrastructure.	Support	The Ministry supports this policy as it recognises the need for development to be adequately serviced by additional infrastructure (which includes schools). This wording of this policy is in line with the Ministry's feedback in June 2022 to enable educational facilities.	Retain as proposed



8.	3b and 4b: New provision	N/A	New provision	<p>The Ministry requests that educational facilities are enabled in the Rural environments to serve the educational needs of the rural community and suggests a restricted discretionary activity status and the following matters of discretion.</p> <p>This provision should apply to both</p> <ul style="list-style-type: none"> • Rural Lifestyle Environment; and • General Rural Environment <p>The Ministry understands that council are of the opinion that the Ministry do not need enabling provisions for educational facilities, as the Ministry is a requiring authority and can establish schools through the Notice of Requirements (NoR) Process. However, the NoR process leans heavily on the policy framework. Therefore, if there are no enabling objectives and policies to tell the decision makers that schools are required to support rural communities, the NoR process can become challenging. Educational facilities are a crucial form of social infrastructure that support the social and economic wellbeing of all communities (including rural communities). The Ministry understands council are concerned about reverse sensitive effects of schools establishing around rural activities. This can be managed through appropriate matters of discretion. The Ministry would like to work with Taupō District Council to form an agreed assessment criteria that would manage these effects appropriately and would ensure all rural communities have adequate access to education.</p> <p>Furthermore, locating educational facilities in rural communities reduces traffic and contributes to lower carbon emissions, as children do not have to travel into town centres to go to school.</p>	<p>Educational facilities in all rural zones</p> <p><u>Activity status: Restricted Discretionary</u></p> <p><u>The Council restricts the exercise of its discretion to the following matters:</u></p> <ol style="list-style-type: none"> <u>The effect on surrounding properties, rural character and amenity; and</u> <u>Whether the scale, intensity and character of the activity is appropriate in the context of the site and receiving environment; and</u> <u>The effects associated with layout, design and location of the activity, including operating hours; and</u> <u>Parking, maneuvering and access; safety and efficiency, including the provision of sufficient off-street parking and the effects of traffic generation; and</u> <u>Provision of on-site infrastructure; and</u> <u>Potential reverse sensitivity effects on any adjoining rural activities.</u>
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**Organisation:**

Department of Conservation

First name: Ashiley**Last name:** Sycamore**On behalf of:**

Penny Nelson, Director-General of Conservation

Postal address: Private Bag 3072, Waikato Mail Centre**Suburb:****City:** Hamilton**Country:** New Zealand**Postcode:** 3240**Email:** asycamore@doc.govt.nz**Daytime Phone:** 0272344847 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 38 - Strategic Directions**Points: 89.1**

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

Seek amendment

Refer to submission document for full submission points.

Include reason(s) for your submission point

Refer to submission document for full submission points.

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

Points: 89.2

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

Refer to submission document for full submission points.

Include reason(s) for your submission point

Refer to submission document for full submission points.

Provision: Plan Change 43 - Taupō Industrial Zone

Points: 89.3

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

Refer to submission document for full submission points.

Include reason(s) for your submission point

Refer to submission document for full submission points.

Attached Documents

File
Submission by the Director-General of Conservation



Department of
Conservation
Te Papa Atawhai

DOC-7222510
DOC Reference: CP227

9 December 2022

Taupō District Council
30 Tongariro Street
Taupō 3330

Email: districtplan@taupo.govt.nz

Attn: District Plan Team

Taupō Operative District Plan – Plan Change 38, 42, & 43 – Strategic Directions, General Rural and Lifestyle Environments, & Taupō Industrial Land

Please find enclosed the submission by the Director-General of Conservation in respect of Plan Change 38, 42, & 43 of the Taupō Operative District Plan. The submission identifies the Director-General's concerns.

Please contact Ashiley Sycamore (RMA Planner) in the first instance if you wish to discuss any of the matters raised in this submission (asycamore@doc.govt.nz or 027 234 4847).

Yours sincerely

Dave Lumley
Operations Manager – Tūrangi District
Department of Conservation
Te Papa Atawhai

Form 5: Submission on notified proposal for policy statement or plan, change or variation

Pursuant to clause 6 of the First Schedule of the Resource Management Act 1991

To: Taupō District Council (**the Council**)

Name of submitter: Penny Nelson, Director-General of Conservation (the **Director-General**)

1. This is a submission on Plan Change 38 (Strategic Directions), Plan Change 42 (General Rural and Lifestyle Environments), and Plan Change 43 (Taupō Industrial Land) of the Taupō Operative District Plan.
2. I could not gain an advantage in trade competition through this submission
3. The specific provisions of the proposal that my submission relates, and the detailed decisions sought to are set out in **Attachment 1** to this submission.
4. I **seek** the following decision from the Council:
 - a. That the particular provisions of Proposed Plan Change 38, 42, & 43 that I support, as identified in Attachment 1, are retained;
 - b. That the amendments, additions and deletions to Proposed Plan Change 38, 42, & 43 sought in Attachments 1 are made; and
 - c. Further or alternative relief to like effect to that sought in 4. a. and 4. b. above.
5. The decisions sought in this submission are required to ensure that Proposed Plan Change 38, 42, & 43:
 - a. promotes the sustainable management of natural and physical resources in the Taupō District as required by Part 2 of the Resource Management Act 1991 (RMA);
 - b. provides for the preservation of the natural character of wetlands, lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development as required by section 6(a) of the RMA;
 - c. provides for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna as required by section 6(c) of RMA;
 - d. is otherwise consistent with Part 2 of the RMA;
 - e. has particular regard to the other matters in section 7 of the Act.

- f. Gives effect to the National Policy Statement for Freshwater Management 2020 (NPS-FM);
 - g. gives effect to the Waikato Regional Policy Statement as required by section 75(3) of the RMA.
 - h. gives effect to the Vision and Strategy for the Waikato River ('Vision and Strategy').
 - i. The changes sought are necessary, appropriate and sound resource management practice.
6. I wish to be heard in support of my submission, and if others make a similar submission, I will consider presenting a joint case with them at the hearing.

Dave Lumley

Operations Manager – Turangi District
Department of Conservation
Te Papa Atawhai

Acting pursuant to delegated authority on behalf of Penny Nelson, Director-General of Conservation
Date: 9 December 2022

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Address for service:

Attn: Ashiley Sycamore, RMA Planner
Department of Conservation
RMA Shared Services
Private Bag 3072
Hamilton 3240
New Zealand
Email: asycamore@doc.govt.nz
Phone: 027 234 4847

ATTACHMENT 1:

**PROPOSED PLAN CHANGE 38, 42, & 43 – TAUPŌ OPERATIVE DISTRICT PLAN
SUBMISSION BY THE DIRECTOR-GENERAL OF CONSERVATION**

The decision that has been requested may suggest new or revised wording for identified sections of Proposed Plan Change 38, 42, & 43. This wording is intended to be helpful but similar, alternative, or additional wording which will address the matters outlined in this submission may be equally acceptable. Text quoted from Proposed Plan Change 38, 42, & 43 and the Taupō Operative District Plan is shown in *Italics*. The wording of decisions sought shows proposed amendments in **bold** with new text as underlined and original text to be deleted as ~~strikethrough~~.

Unless specified in each submission point my reasons for supporting are that the policies are consistent with the purposes and principles of the Resource Management Act 1991 (RMA).

PLAN PROVISION	POSITION	REASON	RELIEF SOUGHT
Proposed Plan Change 38 – Strategic Directions			
General – National Policy Statement for Indigenous Biodiversity exposure draft (NPS-IB)	Amendment requested	The NPS-IB currently has no legal effect; however, it is expected to come into effect in December 2022 prior to the further submission and hearing process of Plan Change 38. The Director-General considers it would be effective and efficient to align the review of the Plan Change 38 provisions with the policy direction and requirements anticipated under the NPS-IB, to avoid an additional plan change.	The Council should undertake a review of the NPS-IB exposure draft (or the soon to be gazetted NPS-IB document) to confirm Proposed Plan Change 38 is giving effect to this national direction. The Strategic Directions chapter should be updated to give effect to the NPS-IB where required. Any other amendments that may be necessary or appropriate to address my concerns.
General – Biodiversity offsetting and biodiversity compensation	Amendment requested	The Director-General notes that while biodiversity compensation is mentioned once in the ODP, there needs to be a more coordinated shift towards an effects management hierarchy to have better regard to section 6(c) of the RMA.	Include an objective and/or policy in relation to biodiversity offsetting and biodiversity compensation. Include definitions for biodiversity offsetting and biodiversity compensation. This could be included within the Natural Environmental Values section of the Strategic Direction chapter.

PLAN PROVISION	POSITION	REASON	RELIEF SOUGHT
		<p>As a starting point, Proposed Plan Change 38 (Strategic Direction chapter) should be updated to include an objective and/or policy in relation to biodiversity offsetting and biodiversity compensation, with definitions.</p> <p>Either at this stage or in a different Plan Change or District Plan update, include clear guidance on biodiversity offsetting with regard to significant biodiversity such as wetlands and wetland fauna.</p> <p>Up to date guidance can be found here: Guidance on biodiversity offsetting in New Zealand: Policies and plans (doc.govt.nz) Additionally, as noted above, it would be effective and efficient to align the District Plan provisions with the policy direction and requirements anticipated under the National Policy Statement on Indigenous Biodiversity.</p>	<p>Provide clear guidance on biodiversity offsetting and biodiversity compensation. Up to date guidance on this topic is found here: Guidance on biodiversity offsetting in New Zealand: Policies and plans (doc.govt.nz)</p> <p>Also, see Appendix 3 in the exposure draft of the National Policy Statement on Indigenous Biodiversity which is available at the following link: NPSIB-exposure-draft.pdf (environment.govt.nz)</p> <p>Any other amendments that may be necessary or appropriate to address my concerns.</p>
2.1 Strategic Direction, 1 Tangata Whenua, Whole Chapter	Support	<p>The Director-General generally supports the tangata whenua section, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the chapter.</p> <p>The provisions are consistent with Part 2 of the RMA and wider planning documents.</p>	<p>Retain as notified, unless iwi/hapu/whanau request specific changes.</p> <p>Note: There are spelling errors in this section that should be corrected prior to Plan Change 38 becoming operative e.g. “the Te Tiriti o Waitangi” should be corrected to “Te Tiriti o Waitangi”; “mautaranga” should be corrected to “mātauranga”.</p>

PLAN PROVISION	POSITION	REASON	RELIEF SOUGHT
2.2 Strategic Direction, 2 Freshwater Quality / Te Mana o te Wai, Whole Chapter	Support	<p>The Director-General generally supports the freshwater quality/Te Mana o te Wai section, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the cultural objectives and policies within this section.</p> <p>The provisions give effect to the NPS-FM and wider planning documents.</p>	Retain as notified, unless iwi/hapu/whanau request specific changes.
2.3 Strategic Direction, 3 Urban Form and Development, 2.3.2 Objectives, Objective 7	Support in part – Amendment requested	<p>The Director-General requests an amendment to Objective 7 to ensure the wording is consistent with the other Objectives within this section and to ensure the consideration of adverse effects on the environment is not limited to just subdivision stage.</p> <p>The wording of Objective 7 is otherwise supported.</p>	<p>Change the wording of Objective 7 to:</p> <p><i>7. Subdivision, use and development is designed to avoid, remedy or mitigate adverse effects on the environment and occurs in a sequenced and coherent manner that protects or enhances the important natural values of the environment where it is located.</i></p>
2.3 Strategic Direction 3 Urban Form and Development, 2.3.3 Policies, Policy 7	Support	<p>The Director-General generally supports Policy 7, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the policy.</p> <p>Papakāinga provisions enable māori to occupy their ancestral land in line with Part 2 of the RMA.</p>	Retain as notified, unless iwi/hapu/whanau request specific changes.
2.3 Strategic Direction, 3 Urban Form and Development, 2.3.3 Policies, Policy 12	Support in part –	The Director-General requests an amendment to strengthen the wording of proposed Policy 12 and	12. Do not support Avoid subdivision and development which will inappropriately affect heritage sites or areas of important natural and landscape values.

PLAN PROVISION	POSITION	REASON	RELIEF SOUGHT
	Amendment requested	thereby have better regard to section 6 of the RMA.	
2.4 Strategic Direction, 4 Climate Change, Whole Chapter	Support	<p>The Director-General generally supports the climate change section. New Zealand's biodiversity and natural landscapes are being affected by climate change. These changes are resulting in extreme weather, rising sea levels, and rising temperatures. This is putting pressure on our wildlife and wild places.</p> <p>Adapting to climate change and reducing our national greenhouse gas emissions will increase the natural environment's resilience to these impacts. Including a section on climate change within Proposed Plan Change 38 is considered to be consistent with Part 2 of the RMA.</p>	Retain as notified.
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.2 Objectives, Objective 2	Support	The Director-General supports proposed Objective 2 for being consistent with section 6(c) of the RMA.	Retain as notified.
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.2 Objectives, Objective 3	Support	The Director-General supports proposed Objective 3.	Retain as notified.
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.2 Objectives, Objective 4	Support	The Director-General generally supports proposed Objective 4, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the objective.	Retain as notified, unless iwi/hapu/whanau request specific changes.

PLAN PROVISION	POSITION	REASON	RELIEF SOUGHT
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.2 Objectives, Objective 5	Support in part – Amendment requested	The Director-General requests an amendment to strengthen the wording of proposed Objective 5 and thereby have better regard to section 6(b) of the RMA.	Change the wording of Objective 5 to: <i>5. The protection of outstanding landscape areas from inappropriate subdivision, land use and development which may adversely affect their landscape attributes.</i>
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.2 Objectives, Objective 6	Support	The Director-General generally supports proposed Objective 6, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the objective.	Retain as notified, unless iwi/hapu/whanau request specific changes.
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.2 Objectives, Objective 7	Support	The Director-General supports proposed Objective 7.	Retain as notified.
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.3 Policies, Policy 1	Support in part – Amendment requested	The Director-General requests the inclusion of ‘subdivision’ within proposed Policy 1 to allow for consideration of the adverse effects that could occur on SNAs from subdivision.	Change the wording of Policy 1 to: <i>1. Protect areas of significant indigenous vegetation and significant habitats of indigenous fauna from subdivision, land use and development activities that will have more than minor effects on the ecological values and processes important to those areas.</i>
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.3 Policies, Policy 2	Support	The Director-General supports proposed Policy 2.	Retain as notified.
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.3 Policies, Policy 3	Support	The Director-General generally supports proposed Policy 3, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the policy.	Retain as notified, unless iwi/hapu/whanau request specific changes.

PLAN PROVISION	POSITION	REASON	RELIEF SOUGHT
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.3 Policies, Policy 4	Support	The Director-General supports proposed Policy 4.	Retain as notified.
2.6 Strategic Direction, 6 Natural Environmental Values, 2.6.3 Policies, Policy 5	Support	The Director-General generally supports proposed Policy 5, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the policy.	Retain as notified, unless iwi/hapu/whanau request specific changes.
Proposed Plan Change 42 – General Rural and Rural Lifestyle Environments			
New papakāinga provisions	Support	The Director-General generally supports the proposed papakāinga provisions, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the proposed provisions.	Retain as notified, unless iwi/hapu/whanau request specific changes.
Proposed Plan Change 43 - Taupō Industrial Land			
The rezoning of identified Site 4 from Rural Environment to Industrial Land: 63 Broadlands Road and 261 Broadlands Road, Taupō	Oppose	<p>Identified Site 4 is proposed to be rezoned from Rural Environment to Industrial Land. There is a lack of detail in the Section 32 Evaluation Report for Plan Change 43 in relation to the potential adverse effects on SNA180 from the rezoning of Site 4 to Industrial Land.</p> <p>The Section 32 report notes that “SNA180 is to the north of the site and a modest 0.38ha within”, while another part of the s32 report states “Area 4 – Broadlands Road West is set back 100m from, and does not extend into, SNA180 which is located</p>	<p>Retain identified Site 4 at 63 Broadlands Road and 261 Broadlands Road, Taupō as Rural Environmental Zone.</p> <p>Alternatively, complete additional investigations to determine whether there are any adverse effects on SNA180 or any area that meets the criteria of a SNA or geothermal SNA from the proposed rezoning of identified Site 4 to Industrial Land. Suggested relief includes, but is not limited to:</p>

PLAN PROVISION	POSITION	REASON	RELIEF SOUGHT
		<p>to the east and north of the rezoning.” It appears the location of the rezoned Industrial Land has been adjusted around the extent of SNA180, however the maps provided in the report could be clearer in this regard.</p> <p>The Director-General considers the loss of indigenous ecosystems and geothermal features, including geothermal vegetation to be a significant risk associated with the proposed rezoning. In case of industrial development adjoining SNAs or geothermal SNAs there is the risk of encroachment into these sensitive environments, which are irreplaceable.</p> <p>The National Policy Statement for Indigenous Biodiversity exposure draft includes a policy in relation to geothermal SNAs which states “Policy 11: Geothermal SNAs are protected at a level that reflects their vulnerability, or in accordance with any pre-existing underlying geothermal system classification.” If an area meets the criteria of a geothermal SNA, the district must work with tangata whenua to make or change its plans to include objectives, policies, and methods that, in relation to any new subdivision, use, and development that provide a level of protection of</p>	<ul style="list-style-type: none"> • A suitably qualified ecologist confirms whether identified Site 4 qualifies as an SNA or a geothermal SNA. • Complete further investigation to determine if other aspects of the NPS-IB should be explored in relation to the proposed rezoning. The NPS-IB is expected to be gazetted in December 2022. • Provide an Ecological Assessment to determine the indigenous biodiversity values of SNA180 and the impact (if any) of the proposed Industrial Land rezoning on those values through the application of the effects management hierarchy.

PLAN PROVISION	POSITION	REASON	RELIEF SOUGHT
		the geothermal SNA further detailed within the NPS-IB.	



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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:

I wish to be heard and present evidence

Attached Documents

File
PDF - District Plan Submission - Angela Bell

Plan Change 38 to the Taupo District Council Plan Strategic Directions
Oppose
The plan change does not provide strategic direction on the rural environment or rural-residential zoning. Primary production and the rural environment is facing a range of significant resource pressures many of which are cross cutting with the strategic matters covered in Plan Change 38, yet these sections appear to only consider the urban environment.
Reference to the National Policy Statement for Highly Productive Land is not considered.
Reference to the National Adaptation Plan and outcomes, including natural hazards is inconsistent.
Plan Change 42 to the Taupo District Plan General Rural and Rural Lifestyle Environments Including Rural Lifestyle maps
Oppose
The plan change does not adequately protect the rural environment from the effects of subdivision, including but not limited to, consideration of infrastructure, reverse sensitivity, climate change and natural hazards, impacts on character, ability for primary production
The plan change is inconsistent with Taupo 2050 and the Regional Policy Statement
The plan change is inconsistent or doesn't adequately take into account with the National Adaptation Plan and Emissions Reduction Plan or other applicable national direction
The plan change is inconsistent with Taupo 2050
The plan change is inconsistent with Waikato Regional Policy Statement
The plan change does not consider adequately the constraints of areas considered for rural residential zoning

Organisation:

Federated Farmers of New Zealand – Rotorua / Taupō

First name: Colin**Last name:** Guyton**Postal address:****Suburb:****City:****Country:** New Zealand**Email:** jcookmunro@fedfarm.org.nz**Daytime Phone:** 027 331 0084

- 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:

Submission made by Colin Guyton - 027 2756546
 Address for Service - Jo-Anne Cook Munro - 027 331 0084

Attached Documents

File
PDF - District Plan Submission - Federated Farmers of New Zealand – Rotorua - Taupo

SUBMISSION

TELEPHONE 0800 327 646 | WEBSITE WWW.FEDFARM.ORG.NZ



Form 5

Submission on publicly notified proposal for policy statement or plan Clause 6 of First Schedule, Resource Management Act 1991

- To: Taupō District Council
30 Tongariro Street
Taupō 3330

Private Bag 2005
Taupō 3352

Via email: districtplan@taupo.govt.nz
- Submission on: **Taupō District Plan Change 38 – Strategic Direction, Plan Change 41 – Removal of Fault Lines, Plan Change 42 – General Rural and Rural Lifestyle Environments and Plan Change 43 – Taupō Industrial Land**
- Date: 9 December 2022
- Submission by: Federated Farmers of New Zealand – Rotorua / Taupō
COLIN GUYTON
ROTORUA / TAUPŌ PROVINCIAL PRESIDENT
Federated Farmers of New Zealand
M 027 275 6546
E jcookmunro@fedfarm.org.nz
- Address for service: **JO-ANNE COOK MUNRO**
SENIOR POLICY ADVISOR / RESOURCE MANAGEMENT SOLICITOR
Federated Farmers of New Zealand
M 027 331 0084
E jcookmunro@fedfarm.org.nz
1. Federated Farmers of New Zealand – Rotorua / Taupō (Federated Farmers) could not gain an advantage in trade competition for this submission.
 2. Please refer to the attached table for the specific provisions of Plan Change 38 – Strategic Direction, Plan Change 41 – Removal of Fault Lines, Plan Change 42 – General Rural and Rural Lifestyle Environments and Plan Change 43 – Taupō Industrial Land that our submission relates to.
 3. Refer to the table attached for the details of Federated Farmers’ submission and whether we support or oppose the specific provisions on which we have submitted.
 4. The decisions sought by Federated Farmers are outlined in the table attached to this submission.
 5. We wish to be heard in support of this submission.
 6. Federated Farmers seeks any consequential changes necessary to give effect to the relief sought in each of the individual submission points made.

1.0 Introduction

- 1.1 Federated Farmers – Rotorua / Taupō (**Federated Farmers**) welcomes the opportunity to submit on the Taupō District Council's (**Council**) proposed plan changes to its district plan.
- 1.2 Federated Farmers acknowledges any submissions submitted by individual members.
- 1.3 Federated Farmers are a primary sector organisation with a long and proud history of representing the needs and interests of New Zealand farmers involved in a range of rural businesses.
- 1.4 Farming has a strong presence in the Taupō district and contributes significantly to the wider Waikato and Bay of Plenty regions. Federated Farmers represent a variety of dairy, dry stock and horticulture land users and seeks to uphold and enhance the value of farming to the region. We have over 200 members located within the Taupō district.
- 1.5 Federated Farmers aim to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
- (a) our members may operate their business in a fair and flexible commercial environment;
 - (b) our members' families and their staff have access to services essential to the needs of the rural community; and
 - (c) our members adopt responsible management and environmental practices.
- 1.6 Federated Farmers is actively involved in district plan reviews across New Zealand. Primary production activities from our members make a significant contribution to the economic, social, and cultural well-being of New Zealand.
- 1.7 Our members want district plans that balances environmental, cultural, social, and economic values while ensuring rules are equitable, cost-effective, pragmatic and effects based. They also want district plans that are written in plain English; are easy to use and understand; acknowledge and reward the positive effects farming has on conservation; and recognise the importance of collaborating with communities to achieve desired environmental outcomes.
- 1.8 A lot of regulation has come at a significant cost on financial and mental health within the primary sector. Many of the costs are unnecessary and place additional pressure on the primary industry. Areas of discussion around climate change, biodiversity, outstanding natural features, and general land use activities need to be carefully considered to ensure that decision making with the consideration of the impacts of Councils decisions economically, socially, and environmentally.

2.0 General Comments

- 2.1 In general, farmers want a district plan that:
- (a) balances environmental, cultural, social, and economic values;
 - (b) ensures rules are equitable, cost-effective, pragmatic and effects based;
 - (c) is written in plain English, is consistent and follows a clear, user-friendly format;
 - (d) acknowledges and rewards the positive impacts farming has on conservation, and
 - (e) recognises the importance of collaborating with communities to achieve desired environmental outcomes.
- 2.2 There is an expectation that Councils, when undertaking a plan review, will adopt a no-frills approach and only target what is necessary to manage and resolve any issues occurring in the district and to meet their responsibilities under the Resource Management Act 1991 (RMA).
- 2.3 Federated Farmers can appreciate that given the uncertainty in future planning frameworks that will be required through the current resource management reforms. A focus on the parts of the district plan that have the most issues at present is a practical and pragmatic approach.

- 2.4 Our members who work and live rurally play a critical role for the community contributing in economic, social, and cultural aspects of the district. We wish to make this point clear to Council for consideration when undertaking decisions impacting rural people.
- 2.5 Rural ratepayers are constantly interacting with both natural and built resources and rely heavily on these resources. Farmers and primary producers are very aware of the importance of managing these resources effectively, responsibly, and sustainably to provide for the viability of both their businesses and the resources for future generations.
- 2.6 It is important that Councils use every means available to them to keep the costs imposed on farmers as low as possible. Farmers and growers are price takers and cannot pass on rising costs to consumers. Rising farming costs (including Council costs) are the key driver behind farmers needing to continually raise farm productivity to remain viable. This usually results in intensification and, in turn, may place additional pressure on the district's resources.
- 2.7 The importance of the economic use of land needs to be recognised throughout the District Plan. A sizable proportion of the district is dedicated to earning a living off the land, which provides not only for those families, but also to district and regional wealth.
- 2.8 A district plan should not be unnecessarily restrictive and should focus on non-regulatory methods such as education and partnerships rather than having a priority focus on regulation. Non-regulatory methods are effective in engaging resource users to collaborate with Councils towards achieving mutual goals and is a more efficient way of achieving 'buy-in' from resource users.
- 2.9 Resource users are more likely to engage and work proactively in partnership with Council when they have a sense of ownership of and responsibility for the targets and activities being conducted. It is important that resource users feel that they have played an active role in the decision-making process. Education is a valuable tool, particularly for issues that are not well-known or where perceptions need adjusting. As people gain more accurate knowledge about issues important in the region, misconceptions will reduce. As a result, people will be more willing to proactively engage in non-regulatory solutions.
- 2.10 Federated Farmers also believes that reducing misconceptions will result in more realistic and achievable community expectations. The need for some regulation is accepted but the Council needs to ensure that it is the most appropriate method before introducing a rule, or a requirement for landowners to adhere to.
- 2.11 Each plan change has been given its own section below. Each section clearly outlines the provisions which Federated Farmers has submitted on, the reasons for doing so and the relief sought.
- 2.12 In respect of our submissions, our suggested amendments are shown with ~~strikeout~~ for deletions and underlining for additional wording. In each of the individual submission points made, the decision sought includes any consequential amendments that may be required to any and all other related elements in the proposed plan.

PROPOSED PLAN CHANGE 38 – STRATEGIC DIRECTIONS

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Chapter 2 - Strategic Directions				
Page 2, Introduction	1	Support in part	<p>Federated Farmers supports the inclusion of a strategic direction chapter into the Taupō District Plan. It is important that the key strategic and significant resource management issues are defined in the district plan as they will play a vital role in influencing the direction the Council takes on behalf of its communities.</p> <p>Federated Farmers supports the proposed strategic directions, including tangata whenua, freshwater quality, urban form and development, climate change, strategic infrastructure and natural values and landscapes.</p> <p>The Taupō district has a significant rural presence and a considerable amount of rural land which is used for primary production. Federated Farmers seeks the protection of the values, character and resources of the general rural environment as it is defined in Proposed Plan Change 42 (subject to any amendments that have been sought).</p> <p>It is important that there is a strategic direction which recognises and provides for the rural economy and environment. Federated Farmers believes that the implementation of a strong rural economy and environment strategic direction would support and enable the continued use of rural land for rural production. It would also provide recognition that farming and other activities located within the general rural environment contribute significantly to the district as well as the wider region. Rural sustainability must include the protection of the existing land use activities such as primary production which have been present and operating in the rural environment for many years, if not decades. Primary production makes a substantial contribution to New Zealand's economy across national, regional and district levels.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the inclusion of a new strategic or significant resource management issue in Chapter 2 Strategic Directions focused on rural sustainability and the protection of the rural economy and environment within the Taupō district; and</p> <p>(b) the inclusion of the following objectives for the strategic direction rural sustainability or wording with similar intent:</p> <p>2.X.X Objectives</p> <ol style="list-style-type: none"> 1. <i>The district's general rural environment is managed in a way that promotes rural sustainability while protecting rural land from inappropriate subdivision, land use and development;</i> 2. <i>Existing, lawfully established rural land use activities are recognised and protected from incompatible activities.</i> 3. <i>The value of the rural economy to the district and the wider region is acknowledged and provided for.</i> <p>(c) the inclusion of appropriate policies which will implement the proposed objectives outlined in (b) above; and</p> <p>(d) any consequential amendments required as a result of the relief sought.</p>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Pages 3 and 4, 2.1 Strategic Direction 1 Tangata Whenua	2	Support	Federated Farmers supports the inclusion of strategic direction 1 in respect of tangata whenua. We also support the objectives and policies as outlined for the strategic direction as they are a positive step towards the district plan acknowledging and providing for the principles to Te Tiriti o Waitangi (the Treaty of Waitangi).	Federated Farmers seeks the following relief: (a) the retention of strategic direction 1 Tangata Whenua as currently written in the plan change or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Page 5, 2.2 Strategic Direction 2 Freshwater Quality / Te Mana o te Wai	3	Support in part	Federated Farmers supports the intent of this strategic direction. There is concern over the strategic direction as it is currently drafted that it is not consistent with the National Objectives Framework for the National Policy Statement for Freshwater Management 2020. ¹ The National Objectives Framework sets out the Te Mana o te Wai hierarchy that applies to all decision making in the freshwater space. The hierarchy is: 1. the health and wellbeing of waterbodies and freshwater ecosystems; 2. the health needs of people (e.g., drinking water); and 3. people and communities provide to provide for their social, economic and cultural wellbeing, now and in the future. The proposed strategic direction for freshwater needs to be rewritten to ensure that it achieves consistency with the National Objectives Framework and clearly sets out the defined process that the framework has defined. It is essential that the strategic direction supports the national direction that has been set by central government.	Federated Farmers seeks the following relief: (a) the amendment of strategic direction 2 Freshwater Quality / Te Mana o te Wai to achieve consistency with the requirement of the National Objectives Framework; and (b) any consequential amendments required as a result of the relief sought.
Pages 6 and 7, 2.3 Strategic Direction 3 Urban Form and Development	4	Support	Federated Farmers supports the strategic direction related to urban form and development as it is currently drafted in the plan change. It recognises that urban development creates additional demands on and for infrastructure and that there is a need for land use to be integrated with infrastructure development.	Federated Farmers seeks the following relief: (a) the retention of strategic direction 3 Urban Form and Development as currently written in the plan change or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.

¹ <https://environment.govt.nz/acts-and-regulations/freshwater-implementation-guidance/inf/> accessed at 8.15am on 9 November 2022.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Page 8, 2.4 Strategic Direction 4 Climate Change	5	Support in part	<p>Federated Farmers supports the inclusion of a strategic direction that deals with climate change and how important it is to ensure that communities need to become climate change resilience.</p> <p>Policy 2.4.3(2) is not supported as it is currently written. There should be an acknowledgement that some land use activities have a functional need for occurring and that some may not be able to achieve a positive climate change outcome but are also not increasing their emissions into the environment.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of Policy 2.4.3 as currently written to read as below or with wording to similar effect;</p> <p>2. <i>Land use activities which will <u>will</u> unduly <u>overly</u> accelerate the effects of climate change will be discouraged recognising that some land use activities will be able to continue with no significant changes to their emissions output.</i></p> <p>(b) and any consequential amendments required as a result of the relief sought.</p>
Pages 9 and 10, 2.5 Strategic Direction 5 Significant and local infrastructure	6	Support in part	<p>Federated Farmers supports strategic direction 5 as it is currently drafted including the objectives and policies. However, we seek an amendment to the policies so that it is acknowledged that infrastructure can (and does) have reverse sensitivity effects on existing land use activities such as farming and primary production.</p> <p>Federated Farmers recognises the importance for infrastructure to be able to be delivered safely and efficiently. However, it is important that the that the strategic direction tells the whole story. The provision of infrastructure can create conflict between the infrastructure provider and the landowner whose property the infrastructure is going on or over</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the addition to Policy 2.5.3 of a new clause to read as below or with wording to similar effect;</p> <p>6. <i>To recognise the reverse sensitivity effects infrastructure may have on existing land use activities and to avoid, remedy or mitigate these effects where possible.</i></p> <p>(b) and any consequential amendments required as a result of the relief sought.</p>
Pages 11 and 12, 2.6 Strategic Direction 6 Natural Environment Values	7	Support in part	<p>Federated Farmers supports the intent of strategic direction 6. The preservation of indigenous ecosystems and biodiversity has and will continue to create tensions between private landowners, Iwi and Councils.</p> <p>There are concerns that the proposed objectives and policies do not provide for existing activities to continue. There needs to be an additional objective and policy that recognises and provides for existing activities such as grazing and other farming activities to continue if the scale and intensity of effects do not / have not increased following the commencement date of the plan.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of strategic direction 6 Natural Environment Values to recognise and provide for non-regulatory methods as well as the role that private landowners play in the preservation of natural environment values; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
			<p>It is felt that the objectives and policies for the strategic direction have missed the mark by not including engagement and education of private landowners in them.</p> <p>Federated Farmers supports the use of non-regulatory measures to assist landowners to continue this journey. The Council needs to be prepared to function as an intermediary so that effective partnerships can be established between all the parties involved with the protection of indigenous vegetation and fauna and natural values and landscapes to ensure the best possible outcomes. Private property owners will not appreciate having provisions imposed on them without having prior engagement.</p> <p>Natural character is a matter that Federated Farmers and its members are heavily invested in. Our members are constantly improving riparian margins and natural character on their land through planting, fencing, and retiring land with natural character from use. All this is done at their expense.</p> <p>It is important that the Council recognises and provides for in the district plan for activities that have a functional need to be located within an area of natural character. These activities are required to be located next to the resources that they utilise and cannot be located anywhere else. These activities need to be provided for as they form part of an existing working landscape.</p>	

PROPOSED PLAN CHANGE 41 – REMOVAL OF FAULT LINES

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Plan Change 41 Removal of Fault Lines				
Entire Plan Change	1	Support in part	<p>Federated Farmers supports in part this plan change. The removal of outdated data from the district plan is essential to ensure the plan stays up-to-date and useful to plan users.</p> <p>However, the removal of the fault lines from the district panning maps, raises the issue of how plan users will be able to determine whether a proposed activity will require resource consent. The district plan rules require a buffer twenty metre either side of fault lines as being unsuitable for any structure (excluding network utility lines, cables, and pipelines). Structures within 20m of the mapped fault line requires resource consent.</p> <p>While the removal of the outdated fault lines and associated provisions from the district plan maps means that more accurate data can be relied upon for subdivision and development resource consents and building consents, it is uncertain if plan users will be able to access this data. This creates an unfairness as without the fault lines being identified in the District Plan, the subdivision consent and Building Act/ building consent processes will be the primary mechanisms for ensuring that the risks posed to buildings from potential fault lines are mitigated.</p>	<p>Federated Farmers seeks the following relief:</p> <ul style="list-style-type: none"> (a) the retention of a reference in the district plan that tells plan users where they can access the up-to-date data on fault lines; and (b) that the Council provides access to the up-to-date fault line data from the GNZ report to district plan users; and (c) any consequential amendments required as a result of the relief sought.

PROPOSED PLAN CHANGE 42 – GENERAL RURAL AND RURAL LIFESTYLE ENVIRONMENTS

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Section 10 – General Rural and Rural Lifestyle Environments				
Page 3, Section 10 Definitions	1	Support in part	<p>Federated Farmers supports the inclusion of the proposed new definitions. In respect of the definition for stock proof fence it is recommended that the Council incorporates the full definition from Schedule 2.7 of the Fencing Act 1978. This would make it easier for users of the district plan as they will not have to go to a different place to find out the requirements are for a stock proof fence.</p> <p>The new definition for papakāinga is supported as it better reflects the concept of how tangata whenua live and work in this space.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of the definition for stock proof fence so that it reads: <i>Stock Proof Fence - A 9 or 10 wire fence: as described in Schedule 2.7 of the Fencing Act 1978, a substantial wire fence having 9 or 10 wires properly strained, with or without battens (droppers) or lacing affixed to the wires between the posts or standards; the posts or standards to be of durable timber, metal, or reinforced concrete, well and substantially erected, and not more than 5 m apart, the top wire not to be less than 1 m from the ground surface, the wires to be galvanised, and of 2.5 mm high tensile steel or 4 mm steel, or its equivalent, the space between the ground and the bottom wire not to exceed 100 mm, the 4 bottom wires to be not more than 130 mm apart.</i></p> <p>(b) the retention of the proposed definition for papakāinga as currently drafted or with wording to similar effect; and</p> <p>(c) any consequential amendments required as a result of the relief sought.</p>
Page 3, Section 10 Definitions	2 and 3		<p>Federated Farmers seeks the inclusion of definitions for the following terms:</p> <ul style="list-style-type: none"> highly productive land; and minor residential units <p>as these terms are used frequently throughout the plan change text. Providing definitions for these terms will provide clarity to plan users.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the inclusion of definitions in chapter 10 of the district plan for the terms ‘highly productive land’ and ‘minor residential units; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Pages 5 to 7, 3b Rural Environment Chapter, 3b.1 Introduction	4	Support	<p>The recognition of the need to ensure that other activities do not affect the ability of the rural environment to function effectively is strongly supported. Federated Farmers also supports the acknowledgement of the functional need of rural</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the retention of 3b.1 Introduction to the rural environment chapter or with wording to similar effect; and</p>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Pages 7 and 8, 3b Rural Environment Chapter, 3b.2 Objectives and Policies – General Rural Environment Objectives	5	Support in part	<p>activities to be located within the rural environment and the potential for reverse sensitivity effects to occur from their continued operation.</p> <p>Federated Farmers has concerns over the way in which the objectives have been written. The objectives do not read as a statement of what is to be achieved through the resolution of a particular issue.</p> <p>An objective should state what is to be achieved, where and when. With the current objectives, the matter of ‘when’ is not addressed and it is uncertain how it would be known what the objectives have been met.</p> <p>The objectives have also been written as absolute targets in that matters are to be protected or avoided. Again, there will be difficulty in assessing the achievement of these objectives which require absolute outcomes.</p> <p>Federated Farmers has concerns over Objective 3b.2.6 which deals with the impacts on infrastructure from subdivision and development. We recognise that for some essential infrastructure there will be a need to locate in the rural environment. However, the objective also should acknowledge that essential infrastructure can cause reverse sensitivity effects on activities located in the rural environment.</p> <p>Objective 3b.2.4 as currently drafted is inconsistent with Part 2 of the Resource Management Act 1911. It is not appropriate that the objective does not address both sides of the issue or that it seeks to protect all infrastructure from the effects of all subdivision and development.</p>	<p>(b) any consequential amendments required as a result of the relief sought.</p> <p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of the objectives for chapter 3b Rural Environment so that they clearly state what is to be achieved, where the objective is to be achieved and when the objective will be achieved; and</p> <p>(b) the amendment of objective 3b.2.6 so that it reads as follows or with wording to similar effect:</p> <p>Objective 3b.2.6 Impacts on essential infrastructure The impacts on <u>essential</u> infrastructure arising from inappropriate subdivision, <u>use</u> and development are managed <u>avoided, remedied or mitigated where it is possible to do so.</u></p> <p>(c) the insertion of a definition for ‘essential infrastructure’ into the district plan; and</p> <p>(d) any consequential amendments required as a result of the relief sought.</p>
Pages 8 and 9, 3b Rural Environment Chapter, 3b.2 Objectives and	6	Support in part	<p>Federated Farmers supports in part the proposed policies as they are currently written. However, the policies do not appear to meet the best practice guidelines set by Quality Planning.²</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of the policies for chapter 3b Rural Environment so that they clearly state how the objective will be</p>

² <https://www.qualityplanning.org.nz/node/610> accessed at 12.18pm on 14/11/2022.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Policies – General Rural Environment - Policies			<p>Policies are intended to define the course of action to achieve or implement an objective. Policies need to be written to provide clear direction to decision makers who will be making the decisions on the methods and/or rules used to implement the policies.</p> <p>Policies need to be written to address effects. This requires consideration of the following:</p> <ul style="list-style-type: none"> • How will the policy meet the relevant objective? • Where in the district or region does the policy apply? • What action is required to be taken and when (i.e., under what circumstances). • Who is required to comply with the policy and who will implement the policy? <p>It is also difficult to determine what objectives some of the policies are related to. For example, it is not clear which policy is related to objective 3b.2.1 Enable Primary Production and objective 3b.2.3 Rural Industry. The focus appears to have been taken off these matters and placed on commercial and industrial activity.</p> <p>In addition, it is not clear which policy connects to objective 3b.2.6 Impacts on Infrastructure. For objectives and policies to be effective and provide clear directions for methods and rules, they need to relate to each other. Policies should address all the objectives defined so that there is a clear connection to the methods or rules to be used to implement the objectives and policies.</p>	<p>met by this policy, where in the region or district will the policy apply, what course of action is to be taken and when, and who is required to comply with the policy and who is to implement the policy; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Pages 10 and 11, 3b Rural Environment Chapter, Objectives and Policies – Rural Lifestyle Environment Objectives	7	Support	<p>Federated Farmers supports the objectives as they are proposed for the rural lifestyle zone.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the retention of objectives 3b.3.1 to 3b.3.8 as currently drafted or with wording to similar effect; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Pages 11 and 12, 3b Rural Environment Chapter, 3b.3 Objectives and Policies – Rural Lifestyle Environment - Policies	8	Support	Federated Farmers supports the policies as they are currently drafted for the rural lifestyle zone.	Federated Farmers seeks the following relief: (a) the retention of policies 3b.3.9 to 3b.3.14 as currently drafted or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Pages 12 to 18, Rules and Standards - Rural Environment – 4b.1 General Rules – Rural Environment	9	Support	Federated Farmers supports the general rules for the general rural environment as they are currently drafted. The rules as proposed allow for the continuation of existing, lawfully established activities within the rural environment without any unnecessary obstacles.	Federated Farmers seeks the following relief: (a) the retention of policies 3b.3.9 to 3b.3.14 as currently drafted or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Pages 18 to 22, Rules and Standards - Rural Environment – 4b.2 Performance Standards – General Rural Environment	10	Support	Federated Farmers supports performance standards 4b.2.1 to 4b.2.5 and 4b.2.7 to 4b.2.15. The performance standards allow for continuation of existing, lawfully established activities within the rural environment without any unwarranted barriers.	Federated Farmers seeks the following relief: (a) the retention of performance standards 4b.2.1 to 4b.2.5 and 4b.2.7 to 4b.2.15.as currently drafted or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Pages 18 to 22, Rules and Standards - Rural Environment – 4b.2 Performance Standards – General Rural Environment 4b.2.6	11	Oppose	Federated Farmers opposes the performance standard as it is currently drafted. Performance standard 4b.2.6 (iv) requires a minimum setback of two hundred metres from all boundaries for buildings for the management of farmed animals from all boundaries. For the purposes of this performance standard, farmed animals means (but is not limited to) buildings used for accommodating livestock of 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 activities, feed pads, animal boarding facilities and stables. The current setback from boundaries for the rural environment is 15-25m (depending on the situation and application). The proposed change is significant and has the potential to	Federated Farmers seeks the following relief: (a) the amendment of the required setback in performance standard 4b.2.6 (iv) from 200m to 25m from residential buildings and community facilities; and (b) any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
			<p>significantly impact on our farming members. It may prove impractical or impossible to meet the new proposed setback of 200m.</p> <p>As previously highlighted to the Council, we question what the issue is that the proposed increase in the setback is trying to address. We note that farmed animals and associated buildings are anticipated in the rural environment, and consequently so are any reasonable and permitted noises, odours and effects on rural amenity.</p> <p>Federated Farmers proposes that a 25m setback be required from any residential units or community facilities (such as churches, schools, halls etc.) regardless of whether where the boundary is located. This will strike an appropriate balance between addressing potential effects on people and aesthetics of rural living, while being more practical for farming operations as the dominant land use in the GRE.</p>	
Pages 23 to 25, Rules and Standards - Rural Environment – 4b.3 General Rules – Rural Lifestyle Environment	12	Support	<p>Federated Farmers supports the general rules that are proposed for the rural lifestyle environment.</p>	<p>Federated Farmers seeks the following relief:</p> <ul style="list-style-type: none"> (a) the retention of general rules 4b.3.1 to 4b.3.7 as currently drafted or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Pages 26 to 28, Rules and Standards - Rural Environment – 4b.4 Performance Standards – Rural Lifestyle Environment	13	Support	<p>Federated Farmers supports the performance standards proposed for the rural lifestyle environment. The standards provide for the development of an appropriate rural lifestyle and seeks to avoid or minimise any adverse effects on adjoining rural environments.</p>	<p>Federated Farmers seeks the following relief:</p> <ul style="list-style-type: none"> (a) the retention of performance standards 4b.4.1 to 4b.4.24 as currently drafted or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Pages 28 to 32, 4b.5 Subdivision Rules – 4b.5.1 Subdivision – General Rural Environment and	14	Oppose in part	<p>Federated Farmers has concerns over how the rule is currently drafted. A minimum size of ten hectares has been used to determine whether a subdivision is a controlled activity or whether it becomes non-complying.</p>	<p>Federated Farmers seeks the following relief:</p> <ul style="list-style-type: none"> (a) the amendment of rule 4b.5.1 to provide for all subdivision in the rural zone as a controlled activity provided certain performance standards are met; and

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
associated performance standards			<p>This creates unwarranted barriers and costs for farmers and other landowners in the rural environment. Council subdivision and development policies and rules should provide for managed growth in rural communities. While acknowledging that the loss of productive land can impact on the district's economy, there is also a need to recognise that farmers undertake small lot subdivision to provide for farm succession, dispose of surplus dwellings and for providing on-farm accommodation for employees.</p> <p>A lot of time and money will need to be spent on a non-complying activity resource consents which potentially could end up being publicly notified and go to a hearing when all that is sought is for a subdivision of land around an existing residential dwelling. This is customary practice for retiring farmers who are looking to hand the on-going operation of a farm over to other people.</p> <p>It is important to realise that there are several activities occurring in the rural zone. The district plan should not put unnecessary barriers in place that prevent landowners from achieving the best use possible of their land.</p> <p>There is also benefit that can be seen for subdivision and development in the rural environment, which will bring people back to the rural communities, increasing the number of ratepayers and increase the number of people that can support existing facilities in rural townships.</p> <p>Federated Farmers supports the performance standards given for rule 4.5.1 (i) as currently drafted.</p>	<p>(b) provide for the subdivision of rural land down to four hectares in size or relief with similar intent; and</p> <p>(c) the retention of the associated performance standards for this rule as currently drafted or with wording to similar effect; and</p> <p>(d) any consequential amendments required as a result of the relief sought.</p>
Pages 28 to 32, 4b.5 Subdivision Rules – 4b.5.8 Subdivision – Bonus Lots	15	Support in part	<p>Federated Farmers would like to acknowledge the work the Council has done on improving this rule since the first version of it was released. The rule is now clear and is easy to understand.</p> <p>The new activity classification of restricted discretionary is supported for the creation of new bonus lots.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of rule 4b.5.8 to allow for the creation of bonus lots in conjunction with outstanding natural landscapes or features and other similar areas; and</p>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
			<p>There is concern over the fact the proposed rules appears only to allow for the creation of bonus lots that are connected to or providing protection for Significant Natural Areas. This limitation to significant natural areas does not provide incentive or encouragement for the long-term protection of other features located within the rural environment. Federated Farmers requests that the Council provides for the environment gains that can be achieved by other areas (such as Outstanding or Amenity Landscape Areas, Foreshore Protection Area, etc), being able to be utilised as bonus lots.</p>	<p>(b) any consequential amendments required as a result of the relief sought.</p>

PROPOSED PLAN CHANGE 43 – TAUPŌ INDUSTRIAL ENVIRONMENTS

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Plan Change 43 Taupō Industrial Environment and Centennial Industrial Environment				
Entire Plan Change	1	Support	<p>Federated Farmers supports proposed plan change 34 in its entirety. The new land to be rezoned is located adjacent to the existing industrial zone which should allow for easy access to the required infrastructure.</p> <p>The industrial zone is located on the edge of Taupō, and it makes sense to rezone land next to the existing zone rather than locating a new industrial zone elsewhere where it could impact on the rural environment.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(d) the retention of the proposed plan change as currently drafted or with wording to similar effect; and</p> <p>(e) any consequential amendments required as a result of the relief sought.</p>



First name: Mark

Last name: Chrisp

On behalf of:
Contact Energy Limited

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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 38 - Strategic Directions

Points: 93.1

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

1.1. Contact seeks the relief set out in **[its submission]**.

1.2. Include an Energy Chapter in the Taupō District Plan in accordance with the National Planning Standards, either as a result of Plan Change 38 or by way of a subsequent Proposed Plan Change in the near future.

Include reason(s) for your submission point

1.1. Contact's detailed points of submission are set out in **[its submission]**.

1.2. More generally, Contact seeks the inclusion of an Energy Chapter in the Taupō District Plan in accordance with the National Planning Standards, either as a result of Plan Change 38 or by way of a subsequent Proposed Plan Change in the near future.

1.3. There are more than 20 power stations in the Taupō District making renewable electricity generation one of the most significant activities in the Taupō District. The ongoing operation of existing renewable electricity generation activities and the development of additional renewable electricity generation capacity is one of the most important resource management issues facing the country (and the planet) in order to address climate change by decarbonising the economy.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions

Points: 93.2

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

Amend the introduction to Chapter 2 Strategic Directions to read as follows:

Chapter 2 Strategic Directions

The following chapter provides an outline of the key strategic and significant resource management matters for the Taupō eDistrict. This chapter includes objectives and policies to guide decision making at a strategic level.

The strategic objectives set the direction for the District Plan and help to implement the Council's community outcomes. They are indicative of the matters which are important to the Taupō District community and reflect the intended outcomes to be achieved through the implementation of the District Plan.

The strategic directions will be particularly relevant for any future changes to the Plan and any significant resource consent applications where there is a requirement to consider District Plan policy.

This chapter should be read as a whole and applied across the district and all zonings unless the provisions relate to a specific zoning or part of the District.

This chapter does not include rules. Relevant rules can instead be found in the chapters under the District Wide and Area Specific headings of the Plan.

The key strategic or significant resource management matters ~~for the district~~ for the Taupō District are:

1. Tāngata Whenua
2. Fresh Water Quality
3. Urban Form and Development
4. Climate Change
5. Strategic Infrastructure
6. Natural Values and Landscapes

Include reason(s) for your submission point

There are a number of typos that need to be corrected.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.1 Strategic Direction 1

Tangata Whenua

Points: 93.3

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

Amend to read as follows:

2.1 STRATEGIC DIRECTION 1 TANGATA WHENUA

The Council, through the District Plan, is required to take into account the principles of the Te Tiriti o Waitangi. This is to be done at all levels of planning and decision making under the Plan. A comparatively high proportion of the district is Māori freehold or multiple-owned land. There is a strong desire for Māori to return to their ancestral land, with a range of aspirations for changed land use, land development and settlement, whilst exercising kaitiakitanga and protecting sites of cultural significance. The District Plan has an important role to play in supporting mana whenua in achieving these aspirations.

The Council is also required to, in partnership with mana whenua, recognise and provide for the Māori values in resource management and decision making. These include the important relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga and to have particular regard to kaitiakitanga.

This is to happen not just through recognition and incorporation of these matters into the Plan but also the wider decision making and plan implementation process. These values should not be considered as a separate matter to the wider plan but are expected to be applied throughout all aspects of planning and decision making within the Taupō District.

Include reason(s) for your submission point

There are a number of typos that need to be corrected.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.1 Strategic Direction 1
Tangata Whenua > 2.1.2 Objective

Points: 93.4

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

Amend to read as follows:

2.1.2 Objectives

1. The values, rights and interests of Taupō District mana whenua are recognised and protected.
2. Mana whenua are a partner in District Plan planning and decision making.
3. Resource management planning and decision making reflects tikanga, mana whakahaere, kaitiakitanga, manaakitanga, whakapapa, mautaranga Māori and te whanake.
4. Support development on Māori land that meet the needs of those landowners and respects the exercise of kaitiakitanga, self-determination and the relationship of tāngata whenua with their land, water, significant sites and Wāhi tapu.
5. Māori are supported to develop their ancestral lands for their social, economic and cultural wellbeing.
6. The principles of te tiriti o Waitangi are taken into account through District Plan planning and decision making.

Include reason(s) for your submission point

There are a number of typos that need to be corrected.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.1 Strategic Direction 1
Tangata Whenua > 2.1.3 Policy

Points: 93.5

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

Amend to read as follows:

2.1.3 Policies

1. Recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu (sacred sites), and other taonga (treasures).
2. Provide for development on Māori land that enables tāngata whenua:
 - a. to act in a way that is consistent with their culture and traditions
 - b. to fulfil cultural, economic and social aspirations of those owners
 - c. enhance their ability to exercise kaitiakitanga
 - d. strengthens their relationships with land, water, significant sites and Wāhi tapu.
3. Recognise the importance of mātauranga Māori, kaitiakitanga and tikanga Māori in landuse planning and decision making.
4. Recognise and support opportunities for tāngata whenua to exercise their customary responsibilities as mana whenua and kaitiaki.
5. Recognise the wider constraints on the utilisation and development of Māori land as different from land in freehold title.
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.
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 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 the incorporation of mātauranga Māori principles into the design, development and/or operation of land use activities.

Include reason(s) for your submission point

There are a number of typos that need to be corrected.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.2 Strategic Direction 2
Freshwater Quality / Te Mana O Te Wai

Points: 93.6

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

Amend to read as follows:

2.2 STRATEGIC DIRECTION 2 FRESHWATER QUALITY / TE MANA O TE WAI

The health and wellbeing of the lakes and rivers in the district have been degraded both directly and indirectly over recent decades. This degradation includes declining water quality, loss of indigenous biodiversity, loss of access and declining water availability and is the result of activities both on land and in the water bodies themselves. Waterways continue to face increasing demands for use, such as takes for irrigation and drinking water, hydro power generation, and assimilation of discharges from towns, agriculture and other industry; as well as pressures arising from land management practices, land use change and intensification. Holistic and integrated management of land and water resources is critical to reversing declining trends.

The Taupō District Plan has a ~~responsibility role to assist with to the management of the~~ adverse effects on the environment that may arise from subdivision and land use in the District. Managing the adverse effects on waterways resulting from subdivision and land use forms part of that responsibility and there are clear benefits from doing this. The state of the Districts freshwater resources is of significant interest to the Taupō District community, and it is important that positive freshwater outcomes are achieved through the ~~application implementation~~ of the Plan.

Include reason(s) for your submission point

There are a number of typos that need to be corrected.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.3 Strategic Direction 3 Urban Form and Development Points: 93.7

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

2.3 STRATEGIC DIRECTION 3 URBAN FORM AND DEVELOPMENT

The Taupō ~~District District's~~ diverse and growing population has led to increased demand for housing and demand for new commercial and industrial areas. Urban development also generates further demand for infrastructure services, particularly development infrastructure such as three waters and transportation services. The District Plan provides a framework for ensuring that urban development, subdivision and changes in land use occurs in a planned and efficient manner and is adequately serviced by infrastructure (including development ~~and of~~ additional infrastructure).

The strategic directions for urban development establish the approach for urban form and development within the Plan as identified through the 2018 District wide growth management strategy, Taupō District 2050. This approach reflects ~~the~~ an efficient and effective urban form which will develop in a manner that is appropriately serviced by infrastructure reflects the important values and communities within the District.

As well as green field development, the plan provides important guidance about the protection of existing urban areas, including Town Centres, to enable them to continue to function effectively in a manner that best serves the wider District.

Include reason(s) for your submission point

There are a number of typos that need to be corrected.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.3 Strategic Direction 3 Urban Form and Development > 2.3.2 Objectives Points: 93.8

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

2.3.2 Objectives

1. The district develops in a cohesive, compact and structured way that:
 - a. contributes to well-functioning and compact urban forms that provide for connected liveable communities;
 - b. enables greater social and cultural vitality and wellbeing, including through recognising the relationship of tāngata whenua with their culture, traditions, and taonga;
 - c. ensures infrastructure is efficiently and effectively integrated with land use; and
 - d. meets the community's short, medium and long-term housing and business needs.
2. Subdivision, use and development of land will be consistent with TD2050 2018 to maximise the efficient use of zoned and serviced urban land and is co-ordinated with the provision of cost effective infrastructure.
3. Subdivision, use and development of land ~~in appropriate locations~~ which will have demonstrable social and cultural benefits to the District's community will be supported.
4. Development is serviced by an appropriate level of infrastructure that effectively meets the needs of that development.
5. The Town Centre Environment is strengthened and reinforced as the primary commercial, retail, recreational, cultural and entertainment centres ~~s~~ for Taupō District.
6. Subdivision, use and development will not detract from the planned urban built form and effective functioning of the environment which it is located.
7. Subdivision is designed to avoid, remedy or mitigate adverse effects on the environment and occurs in a sequenced and coherent manner that protects or enhances the important natural values of the environment where it is located.

~~8. The East Taupō Arterial will continue to act as an 'urban fence' separating urban activities to the west from industrial and rural activities to the east including renewable electricity generation activities.~~

Include reason(s) for your submission point

An important aspect of the urban form of Taupō is the East Taupō Arterial being an 'urban fence' separating urban activities to the west (particularly residential activities) from industrial and rural activities to the east including renewable electricity generation activities. It is important to reinforce this as an enduring objective in the District Plan. The separation of incompatible activities is one of the most fundamental principles of sound planning and resource management practice. The ability to utilise the Wairākei-Tauhara Geothermal System for renewable electricity generation purposes, unfettered by the establishment of compatible urban activities, is recognised as a matter of both regional and national significance in the Waikato Regional Policy Statement (RPS) and the National Policy Statement for Renewable Electricity Generation (NPS-REG). The District Plan has a role to play in implementing the RPS and the NPS-REG.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.3 Strategic Direction 3 Urban Form and Development > 2.3.3 Policy Points: 93.9

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

Amend to read as follows:

2.3.3 Policies

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.
4. Avoid fragmented development that results in inefficiencies in the provision of infrastructure and landuse.
5. Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure (including development **and of** additional infrastructure), according to the capacity limitations of that infrastructure.
6. Provide for subdivision, use and development of land that will lead to demonstrable beneficial social and cultural outcomes for the District's community.
7. Provide for the development of Papakāinga on **mMāori** land to facilitate **mMāori** occupation on their ancestral lands.
8. Maintain strong boundaries to the town centre to consolidate and intensify retail, commercial and office activities within the city centre and protect the planned urban built form of residential neighbourhoods.
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 **district district's** pre-eminent retail, commercial and mixed-use centres.
10. Manage subdivision use and development of land to ensure that it will not:
 - a. have an adverse effect on the functioning of the environment where it is located,
 - b. unduly conflict with existing activities on adjoining properties **and the surrounding areas**,
 - c. compromise development consistent with the intent and planned urban built form of the environment where it is located
 - d. give rise to reverse sensitivity effects **from existing uses**
11. Require the design and location of activities to avoid or mitigate natural hazards to an acceptable level of risk to life, property and the environment.
12. Do not support subdivision and development which will inappropriately affect heritage sites or areas of important natural and landscape values.
13. Ensure that new urban subdivision and land development is designed in a manner that enables effective and logical multi modal transportation links to the surrounding, including planned, urban areas.

Include reason(s) for your submission point

There are a number of typos that need to be corrected and other edits.

Conflicts need to be avoided with activities in the wider surrounding environment, not just on adjoining properties. Reverse sensuosity effects do not arise from "existing uses". They arise from new or expanded sensitive activities locating in proximity to existing uses.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.4 Strategic Direction 4 Climate Change

Points: 93.10

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

2.4 STRATEGIC DIRECTION 4 CLIMATE CHANGE

Climate change has been identified as an issue which is important **globally and** within the Taupō District. A warming environment, longer and drier droughts and increased intensity of storm events are anticipated. It is important that the District and its communities **are able to** adapt to the effects of climate change to be resilient and safe.

For environmental management and planning purposes there are two separate, but important aspects of climate change:

1. Effects on climate change – which refers to activities that may lead to an increase in greenhouse gasses and those which may result in a reduction of greenhouse gasses **from discharged to** the atmosphere or help to facilitate efforts towards decarbonisation, **including the electrification of home heating, transport and industry**.
2. Effects of climate change – which are the effects caused by climate change such as more frequent flooding, droughts or intensive weather events which can endanger communities, assets and infrastructure.

It is important to consider both of these aspects of climate change to effectively enable people and communities to provide for their social, economic, and cultural well-being and for their health and safety. Supporting positive climate change outcomes and ensuring that the effects of climate change are recognised and provided for will assist in planning for a district which **helps avoid**, does not contribute to, and is resilient to, climate change. 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.

Include reason(s) for your submission point

Climate change is one the most significant issues facing the entire planet. As noted in the following section of the Plan (Section 2.5 Strategic Direction 5 Significant and Local Infrastructure), The Taupō District provides up to 20% of New Zealand's electricity supply. There are more than 20 renewable electricity power stations in the Taupō District, mostly located in the Rural Environment. It is therefore one of the most significant land uses in the Taupō District.

The importance of renewable electricity generation needs to be recognised and provided for in the Taupō District Plan, particularly within this section that sets out how climate change is to be addressed within the Taupō District. In that regard, the first priority should be to support activities that will help avoid climate change occurring in the first place. High on that list is renewable electricity generation.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.4 Strategic Direction 4 Climate Change > 2.4.2 Objective

Points: 93.11

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

2.4.2 Objectives

1. Subdivision, use and development of land in the Taupō District will result in positive climate change outcomes.
2. An increase in the amount of electricity generated from renewable sources within the Taupō District to assist with the decarbonisation of the economy.
2. Subdivision, use and development of land in the Taupō District will be resilient to the current and future effects of climate change on the District's current and future communities, including any disproportionate effects on Māori.
3. The Taupō District is well prepared to adapt to the risks and effects from climate change, such as natural hazards.

Include reason(s) for your submission point

A new objective needs to clearly articulate the desirability of increased renewable electricity generation to assist with the decarbonisation of the economy (both within the Taupō District, regionally and nationally).

There are a number of typos that need to be corrected.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.4 Strategic Direction 4 Climate Change > 2.4.3 Policy

Points: 93.12

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

2.4.3 Policies

1. Land use activities which will result in positive climate change outcomes, including through reducing greenhouse gas emissions and decarbonisation, will be supported and encouraged.
2. Recognise and provide for the use and development of the District's renewable energy resources to facilitate decarbonization of the economy, including a reduction in greenhouse gas emissions, increased electricity generation capacity and improved security of supply including transmission.
3. Enable the upgrading and maintenance of existing and development of new renewable electricity generation activities and transmission, including where contributing to one of the following:
 - adaptation required to mitigate risks from climate change
 - provides for increased electricity output, or greater efficiency
 - continued safe, efficient and secure operation.
24. Land use activities which will unduly accelerate the effects of climate change will be discouraged.
35. 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.
46. Subdivision, use and development of land must demonstrate resilience to the effects of climate change over time.

Include reason(s) for your submission point

Policies need to be included which specifically provide for and enable activities that will help address climate change.

There are a number of typos that need to be corrected.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.5 Strategic Direction 5 Significant and Local Infrastructure

Points: 93.13

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

2.5 STRATEGIC DIRECTION 5 SIGNIFICANT AND LOCAL INFRASTRUCTURE

Infrastructure, as defined in the Resource Management Act generally encompasses physical services and facilities which enable society to function, such as the three waters network, transport, communications, **energy electricity** generation, transmission and distribution networks, and any other network utilities undertaken by network utility operators.

Infrastructure is critical to the social and economic wellbeing of people and communities, including providing for their health and safety, and has national, regional and local benefits. However, inappropriately located or designed land use activities can adversely affect the safe and effective functioning of significant and locally important infrastructure **and the natural resources on which they rely on to operate.**

The Taupō District plays an important role in the location and provision of nationally 'significant infrastructure'. Its central location and natural resources means that Taupō is home to:

- State highways (1, 5, 32, 41 and 47).
- the national grid electricity transmission network
- renewable electricity generation facilities **that connect with the national grid**, accounting for up to 20% of New Zealand's total electricity demand
- Airports used for regular air transport services by aeroplanes

The Taupō District is also home to Regionally Significant Infrastructure including municipal waste water systems, the telecommunications and electricity networks.

In addition to nationally and regionally significant infrastructure, local roads and other infrastructure (including development and additional infrastructure) is vital for the ongoing functioning of the **District District's** urban and rural communities.

Include reason(s) for your submission point

The introduction should more accurately refer to "electricity generation" and not "energy generation".

Renewable electricity generation activities is regionally significant whether or not it is connected to the national grid.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.5 Strategic Direction 5 Significant and Local Infrastructure > 2.5.2 Objectives

Points: 93.14

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

Retain the following Objectives:

2.5.2 Objectives

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 **and protected** in decision making and land use planning.
2. The local and national benefits of the sustainable development, operation, maintenance and upgrading of electricity transmission and renewable electricity generation resources and activities are recognised and **encouraged achieved.**
3. Land use in the District will not adversely affect the capacity and the safe and effective functioning of nationally and regionally significant and local infrastructure required to service existing and future communities.
4. Local and national transport infrastructure located in the Taupō District operates in a safe and effective manner.

Include reason(s) for your submission point

Minor additions are sought to the policies.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.5 Strategic Direction 5 Significant and Local Infrastructure > 2.5.3 Policy

Points: 93.15

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

Amend to read as follows:

2.5.3 Policies

1. Recognise and provide for the national, regional and local benefits of renewable **energy electricity** generation

activities and resources, and transmission activities, in relation to climate change, security of supply, and social, and economic wellbeing of people and communities and for their health and safety.

2. Recognise **and provide for** the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure.
3. Subdivision, landuse and development will not adversely affect (including reverse sensitivity effects) the effective and safe functioning of infrastructure.
4. Planning and development of infrastructure will consider the needs and the wellbeing of current and future communities.
5. Recognise that infrastructure can have important environmental, economic, cultural and social effects.

Include reason(s) for your submission point

The introduction should more accurately refer to “electricity generation” and not “energy generation”.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.6 Strategic Direction 6
Natural Environment Values

Points: 93.16

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

Amend to read as follows:

2.6 STRATEGIC DIRECTION 6 NATURAL ENVIRONMENT VALUES

The Taupō **ed**istrict is characterised by important landscapes and natural areas. These areas are a strong part of the identity to the district and are valued by the local communities and also hold importance nationally. As well as being an important part of the **District District's** identity, these areas also have a range of important social, cultural and environmental (including intrinsic) values.

The effects of human activities such as built development, vegetation clearance and land development **ete**: can significantly alter the character of the environment resulting in the loss of these areas and their values. While parts of the District have been significantly modified by human activity, vast areas of the natural landscape remain.

These areas are on a range of public (reserve, forest and national parks) and private **tenure land**. There is also a high proportion of these areas on **m**Māori land throughout the District which can impact the ability of **m**Māori landowners in undertaking development on their ancestral lands.

Include reason(s) for your submission point

Minor edits.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.6 Strategic Direction 6
Natural Environment Values > 2.6.2 Objectives

Points: 93.17

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

2.6.2 Objectives

1. Recognise the importance of the **District District's** natural values and landscapes and their significance to the Taupō **District District's** 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 on** 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.

Include reason(s) for your submission point

Minor edits.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.6 Strategic Direction 6
Natural Environment Values > 2.6.3 Policy

Points: 93.18

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

Amend to read as follows:

2.6.3 Policies

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.
3. Recognise and provide for tāngata whenua in their role as kaitiaki of the natural values on their lands and the wider district.
4. Activities must recognise and maintain the attributes of identified outstanding natural features and landscapes and not have any more than minor adverse effects on them.
5. Encourage the protection, enhancement and restoration of natural and landscape value areas, including by supporting opportunities for tāngata whenua to exercise their customary responsibilities as mana whenua and kaitiaki in restoring, protecting and enhancing these areas.
6. Recognise the contribution made by landowners to the protection and enhancement of areas of natural values and landscapes.

7. Recognise the benefits of offset measures and compensation and provide for their use as feasible alternatives to manage significant residual adverse effects of renewable electricity generation activities and regionally significant infrastructure.

Include reason(s) for your submission point

Minor edits are proposed and the addition of one additional policy which covers an increasingly important aspect of consenting renewable electricity generation activities.

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.2 Strategic Direction 2
 Freshwater Quality / Te Mana O Te Wai > 2.2.2 Objective

Points: 93.19

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

Retain the objective.

Include reason(s) for your submission point

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.2 Strategic Direction 2
 Freshwater Quality / Te Mana O Te Wai > 2.2.3 Policy

Points: 93.20

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

Retain the Policy.

Include reason(s) for your submission point

Provision: Plan Change 38 - Strategic Directions > Chapter 2 Strategic Directions > 2.2 Strategic Direction 2
 Freshwater Quality / Te Mana O Te Wai > 2.2.3 Policy

Points: 93.21

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

Retain the Policy.

Include reason(s) for your submission point

Provision: Plan Change 41 - Removal of Fault lines

Points: 93.22

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

Contact seeks that Taupō District Council adopts PC41 as notified.

Include reason(s) for your submission point

Contact supports PC41 in its entirety. It is important that resource management decisions are made with the best available information.

Contact supports the deletion of fault lines from the planning maps and the associated rule in Section 4e.10 of the Taupō District Plan. Dealing with any risks associated with fault lines at the subdivision and/or building consent stage of a proposed development is efficient and appropriate.

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

Points: 93.23

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

Contact seeks the relief set out in **Attachment A [to its submission]**.

To the extent that the relief sought as set out in Attachment A is not accepted, Contact seeks any alternative relief which will have the same or similar effect.

Include reason(s) for your submission point

Contact's detailed points of submission are set out in [its submission].

Contact supports the creation of Rural Lifestyle Zones on the basis that they can provide for rural residential activities in appropriate locations. However, a key aspect of Contact's submission is seeking to ensure that Rural Lifestyle Zones are only created in appropriate locations which does not include within or in close proximity to permitted, lawfully existing and/or consented renewable electricity generation activities.

If Rural Lifestyle Environments are only located in appropriate locations, that outcome avoids the need to Contact (and others) to seek changes to the rules and performance standards relating to the Rural Lifestyle Environment to avoid reverse sensitivity effects. That is the approach that has been taken in this submission. If Contact's relief sought in relation to the location of Rural Lifestyle Zones is not accepted, then Contact seeks alternative relief (including additional changes to the rules and performance standards relating to the Rural Lifestyle Environment) which will avoid the creation of reverse sensitivity effects.

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

Points: 93.24

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

Amend the definition of **Rural Industry** as follows:

Rural Industry – 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.

Insert a new definition of Renewable Electricity Generation as follows (being the same definition in the NPS-REG): Renewable electricity generation means generation of electricity from solar, wind, hydro-electricity, geothermal, biomass, tidal,

wave, or ocean current energy sources.

Include reason(s) for your submission point

Contact opposes the inclusion of “geothermal / electricity generation” within the definition of Rural Industry.

Renewable electricity generation is an activity that has been recognised in the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG) as a matter of national significance. Renewable electricity generation is also an activity identified in the Waikato RPS and Bay of Plenty RPS as a Regionally Significant Infrastructure. It is therefore inappropriate to treat that activity as part of, and in the same manner as, other activities that occur in the rural environment such as forestry, agriculture and dairy farming. The elevated status and importance of renewable electricity generation should be recognised in the Taupō District Plan with its own set of objectives, policies and methods.

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

Points: 93.25

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

Oppose

Insert a new definition of Renewable electricity generation activities (being the same definition in the NPS-REG) as follows:

Renewable electricity generation activities means the construction, operation and maintenance of structures associated with renewable electricity generation. This includes small and community-scale distributed renewable generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.

Insert a new definition of reverse sensitivity (being the definition in the Waikato RPS) as follows:

Reverse sensitivity is the vulnerability of a lawfully established activity to a new activity or land use. It arises when a lawfully established activity causes potential, actual or perceived adverse environmental effects on the new activity, to a point where the new activity may seek to restrict the operation or require mitigation of the effects of the established activity.

Include reason(s) for your submission point

Due to the nature of the following submissions by Contact, two additional definitions need to be included in the Taupō District Plan.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies > 3b Rural Environment Chapter > 3b.1 Introduction

Points: 93.26

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

Seek amendment

Amend the Introduction to Chapter 3b.1 as follows:

3b.1 Introduction

The Rural Environment makes up most of the land within the District and has been categorised into two distinct areas, being the General Rural Environment and the Rural Lifestyle Environment. These separate areas highlight the increasing need to protect the open space characteristics of the Rural Environment and its production values, while also providing for the growth of the District and the demand for rural lifestyle living in specific locations. The Rural Environment also contains sites that are of significance, some of these are identified as Outstanding Landscape Areas. The Rural Environment objectives and policies seek to manage subdivision and land use activities in a way that reflects the productive nature of the land, the rural level of infrastructural services and the amenity values of the landscape, as well as managing effects and enabling rural lifestyle living in appropriate areas. Other activities that are anticipated in the Rural Environment are tourism activities, visitor accommodation and renewable electricity generation and transmission. It is important that all such activities do not affect the ability of the rural environment to function effectively. It is also important to acknowledge that existing, lawfully established activities in the Rural Environment are able to continue operating and that activities that choose to locate in close proximity to these activities are aware of the effects they can generate and that the Rural Environment is the best location for these activities. It is expected in the Rural Environment that all properties are self-servicing in terms of the provision of potable water and the disposal of stormwater and wastewater.

The papakāinga provisions recognise the intent of Part 2 of the RMA and provide for the occupation by whanau, hapū or iwi members on Māori land. The provisions recognise the importance of enabling Māori to settle on their ancestral lands. Papakāinga development will often be at higher densities than other residential land uses in the rural environment. Papakāinga may also have associated social, cultural or commercial aspects to support the community who reside there.

In addition to papakāinga there is a wide range of cultural activities and activities of importance to Māori which are appropriate to occur within the rural environment.

General Rural Environment

The General Rural Environment is predominantly characterised by large open space and vegetated areas including productive farmland and forest, ridgelines, native bush, lakes, rivers and their margins. Other prime characteristics of the General Rural Environment are the diverse range of land uses including farming, horticulture, energy sources and plantation forestry activities, with dispersed buildings and rural roads. There is also a wide range of development associated with tourism activities, recreation, and the District is one of New Zealand's most significant for the generation, storage and transmission of renewable electricity.

The purpose of separating the General Rural Environment from the Rural Lifestyle Environment is to preserve the productive potential of the land and other natural resources within the General Rural Environment by retaining large property sizes and limiting the extent of housing provided for, ~~Yet~~ allowing appropriate development to occur while preserving the rural character 'openness' of the General Rural Environment. The creation of the General Rural Environment aims to support primary productive uses, renewable electricity generation activities, and rural industry, meaning an activity being activities that directly supports, services, or is are dependent on primary production and/or has a locational or functional need to be within the General Rural Environment (rather than an urban environment).

Primary production a Activities in the General Rural Environment will produce effects that are different from urban areas, such as noise, odour, vibration, spray drift and dust. Allowing these activities to operate in a more suitable environment, along with compatible activities, aims to protect rural land uses from unnecessary restrictions. The General Rural Environment provisions seek to limit the scale of commercial and industrial activities unless they are dependent on primary production and/or have a locational functional or operational need to be within the General Rural Environment. This is to avoid the uptake of General Rural Environment land by activities which are provided for in other Environments and may therefore impact on the land available for primary production activities within the General Rural Environment.

Rural Lifestyle Environment

The Rural Lifestyle Environment has been created to address the increasing demand for rural lifestyle living within the Rural Environment. The Rural Lifestyle Environment aims to provide for rural residential development in specific locations for those who want the benefits of rural living without necessarily undertaking a productive rural activity. By creating separate areas in appropriate locations within the Rural Environment, the Rural Lifestyle Environment creates areas for rural living on smaller property sizes, whilst retaining separation from the rural production and other activities predominating in the General Rural Environment. This separation of activities serves to minimise reverse sensitivity issues. By concentrating rural residential development within the Rural Lifestyle Environment this serves to preserve the open space characteristics rural character and the productive potential of the rest of the Rural Environment, and to reduce the potential for land use conflict.

The Rural Lifestyle Environment will be less populated than a Residential Environment, with standards in place for minimum lot sizes to preserve the rural residential aspect of the area. Limited provision is also made for home business and commercial activity to occur, but not of a scale or extent that changes the predominantly rural residential amenity and character intended. The Rural Lifestyle Environment areas are located closer in proximity to urban areas to allow for access to community facilities within the district's townships.

Include reason(s) for your submission point

The introductory statement to Chapter 3b provides context about the nature and character of the District's rural environment, and the activities that are anticipated to occur within it.

Contact generally supports the introductory statement but seeks minor changes to recognise the importance and functional need for renewable electricity generation to occur within the Rural Environment, its contribution to **the regional economy and** New Zealand's security of electricity supply.

These changes also reflect the need to ensure that renewable electricity generation activities are protected from potential reverse sensitivity effects (such as housing, visitor accommodation and lifestyle development both within the General Rural Environment and the new Rural Lifestyle Environment), and that if sensitive and incompatible activities do establish, they do not constrain the ability of renewable electricity generation activities to continue operating efficiently and effectively.

Contact supports the statement about creating Rural Lifestyle Environments "*in appropriate locations within the Rural Environment*".

Contact also supports the statement: "*By concentrating rural residential development within the Rural Lifestyle Environment this serves to preserve the open space characteristics and productive potential of the rest of the Rural Environment, and to reduce the potential for land use conflict.*".

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.2.1 Enable Primary Production **Points: 93.27**

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

Retain Objective 3b.2.1.

Objective 3b.2.1 Enable Primary Production **and the Use of Natural Resources**

Primary production and the use of natural resources are is enabled by protecting the availability of the rural land and other resources s and its their productive capability.

Include reason(s) for your submission point

Contact supports Objective 3b.2.1 with an amendment so that it covers a wider range of uses anticipated in the General Rural Environment beyond just “primary production”.

In accordance with s75(3) of the RMA District objectives and policies must give effect to existing RPS objectives and policies. Objective IM-02 in the Waikato RPS is ‘Resource Use and Development’. One of the policies which achieves Objective IM-02 is IM-P4 ‘Regionally Significant Industry and Primary Production’. The suggested amendments give effect to the Waikato RPS.

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.2.2 Maintaining the established General Rural character **Points: 93.28**

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

Amend Objective 3b.2.2 to read:

Objective 3b.2.2 ~~Maintaining the established General~~ Rural character

~~The established character of the General Rural Environment is maintained and the cumulative erosion of its character through incremental subdivision and development is avoided.~~

Enable a range of activities in the General Rural Environment that are compatible with rural character.

Include reason(s) for your submission point

Contact is of the view that Objective 3b.2.2 is misguided and seeks to achieve the wrong outcome. Firstly, it presupposes that the established character of the General Rural Environment represents a good environmental outcome in all respects to the extent that it should be “maintained”. Secondly, an objective that seeks to maintain the “established character” is essentially seeking no change. The objective seeks to avoid “incremental subdivision and development” which essentially locks in the status quo and will make it difficult for any new development to occur, including new development that has been identified in other planning provision as being appropriately located in the General Rural Environment.

As an example, a new geothermal power station will definitely change the character of the part of the General Rural Environment in which it is proposed and ultimately constructed which is an outcome contrary to Objective 3b.2.1. The same applies for other forms of development such as the construction and operation of a dairy shed.

The wording of some of the existing planning provisions in the Rural Environment have been proposed as alternative wording for Objective 3b.2.2.

The relief sought focuses on the use of “rural character” which scope of activities, affect and structure are outlined in Policy 3.b.2.9.

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: 93.29**

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

Retain Objective 3b.2.3.

Inset a new objective following Objective 3b.2.3 as follows:

Objective 3b.2.X Renewable Electricity Generation and Transmission Activities

Enable the development, operation, maintenance and upgrading of renewable electricity generation activities and transmission activities in the General Rural Environment.

Include reason(s) for your submission point

Due to its elevated status under the NPS-REG, Contact has sought (above) that the definition of Rural Industry be amended to delete any reference to electricity generation and that a new definition of Renewable Electricity Generation and Renewable Electricity Generation Activities be including in the Plan. In line with that outcome, a new objective needs to be included in the Plan seeking to enable renewable electricity generation activities (and transmission activities by association).

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: 93.30**

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

Seek amendment

Amend Objective 3b.2.4 as follows:

Objective 3b.2.4 Other activities

Māori cultural activities, tourism activities, and visitor accommodation ~~and renewable electricity generation and transmission~~ activities are enabled in appropriate locations within the General Rural Environment.

Include reason(s) for your submission point

As a consequential change to the relief sought above (inserting a new objective in relation to renewable electricity generation activities), Objective 3b.2.4 needs to be amended to remove the reference to renewable electricity generation (and transmission by association).

Visitor accommodation is a sensitive activity and should only be enabled in appropriate locations within the General Rural Environment rather than enabled anywhere including in locations whereby reverse sensitivities could arise.

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.2.5

Avoidance of reverse sensitivity

Points: 93.31

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

Seek amendment

Amend Objective 3b.2.5 as follows:

Objective 3b.2.5 Avoidance of reverse sensitivity

Reverse sensitivity effects on permitted, and legally established, and/or consented activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided.

Include reason(s) for your submission point

Contact supports an objective in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects. However, Contact is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already *exists*. This is particularly concerning for Contact. The objective needs to also cover consented activities which have yet to be constructed / undertaken.

Contact's geothermal generation activities, which do and are anticipated to occur in the District's General Rural Environment (as identified in the introductory text to this chapter and Strategic Directions chapter).

From time-to-time new wells and pipelines will be required to establish to support the on-going operation of its geothermal generation plants.

This objective and policy framework could allow housing to proliferation of new houses to establish in areas of the rural environment because there are few if any rural production activities operating.

Reverse sensitivity is a key issue for Contact. The introduction of new sensitive activities into the rural environment where rural production and renewable electricity generation exist has the potential to create complaint as the two are incompatible.

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: 93.32

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

Seek amendment

Amend Objective 3b.2.6 as follows:

Objective 3b.2.6 Impacts on infrastructure

The impacts ~~on infrastructure~~ arising from subdivision and development ~~are managed~~ do not compromise the safe and efficient functioning of infrastructure.

Include reason(s) for your submission point

An objective (or policy) that only seeks to "manage" something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupō District Plan.

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: 93.33

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

Amend Policy 3b.2.9 as follows:

Policy 3b.2.9 ~~Maintaining the established Rural~~ character

Enable activities in the ~~Maintain the established~~ General Rural Environment ~~that will not compromise the character of the General Rural Environment~~, as defined by:

- ~~a) Extensive pastoral farming and forestry~~
- ~~b) Renewable electricity generation activities~~
- ~~c) Geothermal areas and activities, electricity transmission and distribution~~
- ~~ad) Large open spaces between built structures~~
- ~~be) A mix of residential and rural industry buildings~~
- ~~c) Noises related to production activities during the day but low levels of noise at night~~
- ~~d) Low levels of light spill~~
- ~~f) Effects from activities including noise, vibration, dust, odour and visual effects~~
- ~~e) Infrequent vehicle movements to and from a site~~
- ~~fg) Limited signage that directly relates to the activity operating on the site.~~

Include reason(s) for your submission point

Contact opposes Policy 3b.2.9 for the same reasons it opposes Objective 3b.2.2.

Contact is of the view that Policy 3b.2.9 is misguided and seeks to achieve the wrong outcome. Firstly, it presupposes that the established character of the General Rural Environment represents a good environmental outcome in all respects to the extent that it should be “maintained”. Secondly, a policy that seeks to maintain the “established character” is essentially seeking no change.

The policy characterises the rural environment by matters such as “limited signage” whereas the existence of more than 20 large-scale renewable electricity generation activities is a far more significant and defining aspect of the General Rural Environment in the Taupō District.

Other aspects of the policy just need to be more accurate and not create false expectations.

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.2.10 Residential units
Points: 93.34

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

Amend Policy 3b.2.10 as follows:

Policy 3b.2.10 Residential units

Avoid the cumulative effects of rural lifestyle development by ~~providing for these activities within the Rural Lifestyle Environment and otherwise~~ limiting residential units ~~within the General Rural Environment~~ that:

- ~~a) Increase the demand for community infrastructure and services~~
- ~~b) Result in the inefficient use of land or loss of future flexibility for productive uses~~
- ~~c) Erode the general rural character through its density, scale and location-~~
- ~~d) Result in the potential to generate reverse sensitivity effects.~~
- ~~e) Constrain the ability to access or utilise renewable energy resources.~~

Include reason(s) for your submission point

Contact supports Policy 3b.2.10 but it needs to be expanding to address one of the most significant adverse effects that can arise as a result of residential units being established in the General Rural Environment, that being reverse sensitivity effects. The establishment of residential units should also not constrain the ability to access or utilise renewable energy resources (which are of national significance).

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: 93.35

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

Amend Policy 3b.2.12 as follows:

Policy 3b.2.12 Minor residential unit

Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a

suitable size, and to ensure that the future availability of the rural land resource will not be compromised and to avoid the potential for reverse sensitivity effects.

Include reason(s) for your submission point

It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.

A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment.

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.2.13 Avoiding reverse sensitivity **Points: 93.36**

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

Amend Policy 3b.2.13 as follows:

Policy 3b.2.13 Avoiding reverse sensitivity

Any adverse effects generated by an new sensitive activity must be managed within the allotment so as to avoid adversely affecting reverse sensitivity effects on permitted, and lawfully established and/or consented neighbouring activities.

Include reason(s) for your submission point

Contact supports a policy in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects.

Contact seeks an amendment to the policy for the same reasons set out in relation to the changes sought to Objective 3b.2.5.

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: 93.37**

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

Amend Policy 3b.2.14 as follows:

Policy 3b.2.14 Commercial and industrial activity

Limit the scale of commercial and industrial activity (excluding renewable electricity generation activities) to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary production and other activities provided for within the General Rural Environment.

Include reason(s) for your submission point

Because renewable electricity generation activities fall within the definition of industrial activities, they need to be excluded from the first part of the policy which seeks to limit commercial and industrial activities.

Contact supports the intent of the policy but it needs to be widened to cover other activities (including renewable electricity generation activities) that are provided for and anticipated in the General Rural Environment beyond just primary production.

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.2.15 Allotment size **Points: 93.38**

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

Retain Policy 3b.2.15.

Include reason(s) for your submission point

Contact supports Policy 3b.2.15 on the basis that it reinforces the intension that the General Rural Environment is for larger scale productive activities (rather than rural residential opportunities).

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: 93.39

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

Delete Objective 3b.3.1 and replace it with the following:

Objective 3b.3.1 Enable Rural Residential Activities

Zone parts of the Rural Environment as Rural Lifestyle Environment to enable and provide for rural residential activities in appropriate locations where they will not give rise to reverse sensitivity effects on the surrounding General Rural Environment or Industrial Environments.

Include reason(s) for your submission point

It is assumed that this objective relates to activities within the Rural Lifestyle Environment (if in is intended to control activities in the surrounding General Rural Environment, then the objective in in the wrong section of the Plan).

This is an unexpected objective for the parts of the Rural Environment where a greater density of subdivision and development is anticipated and provided for. The objective should focus on enabling rural residential opportunities in appropriate locations (i.e. where they will not create reverse sensitivity effects on activities in the wider General Rural Environment or Industrial Environments).

If Rural Lifestyle Environment are proposed in inappropriate locations (and no decision is made to amend that situation), it forces Contact (and other parties) to seek to amend the rules and performance standards within the Rural Lifestyle Environment as an alternative means to avoid the creation of reverse sensitivity effects. It is preferable that only appropriate locations are zoned Rural Lifestyle Environment whereby activities occurring within those zones do not need to be constrained by way of the rules and performance standards.

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: 93.40

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

Amend Objective 3b.3.2 as follows:

Objective 3b.3.2 Avoid reverse sensitivity

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

Include reason(s) for your submission point

Contact supports an objective in the Rural Lifestyle Environment chapter that seeks to avoid reverse sensitivity effects. However, Contact is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already *exists*. This is particularly concerning for Contact. The objective needs to also cover consented activities which have yet to be constructed / undertaken.

Contact's geothermal generation activities, which do and are anticipated to occur in the District's General Rural Environment (as identified in the introductory text to this chapter and Strategic Directions chapter). From time-to-time new wells and pipelines will be required to establish to support the on-going operation of its geothermal generation plants.

This objective and policy framework could allow housing to proliferation of new houses to establish in areas of the rural environment because there are few if any rural production activities operating.

Reverse sensitivity is a key issue for Contact. The introduction of new sensitive activities into the rural environment where rural production and renewable electricity generation exist has the potential to create complaint as the two are incompatible.

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: 93.41

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

Amend Objective 3b.3.3 as follows:

Objective 3b.3.3 Commercial and industrial activities

The establishment of commercial and industrial activities that have no functional need to locate and are incompatible with the rural residential activities occurring within the Rural Lifestyle Environment are avoided.

Include reason(s) for your submission point

Contact supports Objective 3b.3.3 but it needs to be more precisely drafted for accuracy and clarity

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.3.4 Consolidate rural lifestyle activities

Points: 93.42

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

Retain Objective 3b.3.4.

Include reason(s) for your submission point

Contact supports the consolidation of Rural Lifestyle activities within identified and appropriately located Rural Lifestyle Environments.

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: 93.43

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

Amend Objective 3b.3.6 as follows:

Objective 3b.2.6 Impacts on community infrastructure

The impacts ~~on community infrastructure~~ arising from subdivision and development ~~are managed~~ do not compromise the safe and efficient functioning of infrastructure.

Include reason(s) for your submission point

An objective (or policy) that only seeks to “manage” something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupō District Plan.

The objective should apply to all infrastructure, not just community infrastructure.

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: 93.44

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

Add a new point i) to Policy 3b.3.9 as follows:

i) An environment that is surrounded by a working rural environment including rural production, geothermal areas and renewable electricity generation activities.

Include reason(s) for your submission point

Contact supports Policy 3b.3.9 but it also needs to recognise, and not have adverse effects on, the nature of the surrounding General Rural Environment.

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.3.10 Lot sizes and setbacks for allotments adjoining the General Rural Environment

Points: 93.45

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

Retain Policy 3b.3.10.

Include reason(s) for your submission point

Requiring larger lot sizes and greater building setbacks for new dwellings within the Rural Lifestyle Environment are two key methods for managing reverse sensitivity effects. Contact therefore supports this policy on this basis.

However, Contact reiterates that these two measures alone will not always avoid the potential for reverse sensitivity effects (which is what new Objective 3b.3.2 requires), and this needs to be reflected across several policies within this sub-chapter. See the relief sought in relation to other objectives and policies.

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.3.12 Minor residential unit

Points: 93.46

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

Amend Policy 3b.3.12 as follows:

Policy 3b.3.12 Minor residential unit

Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, **and** to further protect the character of the ~~r~~Rural Lifestyle Environment—**and to avoid reverse sensitivity effects.**

Include reason(s) for your submission point

A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment.

It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.

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.1.1 Activities in the General Rural Environment

Points: 93.47

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

Retain Rule 4b.1.1.

Include reason(s) for your submission point

Contact supports Rule 4b.1.1 on the basis that it is consistent with the approach throughout the rest of the Plan, is effects based, and enables activities to occur that do not need to be the subject of a resource consent application process.

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: 93.48

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

Amend Rule 4b.1.2 as follows:

- i. A minor residential unit which complies with the performance standards is a **permitted activity**.
- ii. A minor residential unit which does not comply with the performance standards is a **restricted discretionary activity**.

When considering activities under Rule 4b.1.2 Council restricts the exercise of its discretion to the following matters:

- a. The proximity between the primary residential unit and the minor residential unit.
- b. The extent to which the residential unit and vehicle access point design, siting and external appearance adversely affects rural character and amenity.
- c. 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.

d. Effect on nearby sites, including outlook and privacy.

e. Whether the residential unit and the vehicle access point can be more appropriately located to maintain, enhance or restore indigenous biodiversity values.

f. The ability to **mitigate avoid** adverse effects, **including reverse sensitivity effects**, through the use of screening, planting, landscaping, **and** alternative design, **and/or other means including restrictive covenants**.

g. Proposed methods for the avoidance, remedying or mitigation of potential adverse effects, and the degree to which they would be successful

h. The likelihood of future subdivision which results in the minor residential unit being on a separate allotment to the primary residential unit.

i. The potential to constrain access to and/or the utilisation of renewable energy sources.

Include reason(s) for your submission point

Minor residential units are sensitive activities whereby their establishment needs to be controlled so as to not result in reverse sensitivity effects.

An additional criterion has been added to ensure that minor residential units do not constrain access to and/or the utilisation of renewable energy sources.

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: 93.49**

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

Retain Rule 4b.1.3.

Include reason(s) for your submission point

Contact supports this rule.

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.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Steamfields **Points: 93.50**

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

Amend Rule 4b.1.4 as follows:

4b.1.4 Electricity Generation Core Sites, Renewable **Electricity Energy** Generation Activities and Geothermal **Areas Steamfields**

i. Any activity involving continued operation, maintenance and minor upgrading of existing electricity generation core sites, geothermal **areas steamfields**, renewable **energy electricity** generation activities and associated structures **and ancillary activities** is a **permitted activity**.

ii. **Activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators are a permitted activity.**

NOTE: For the purpose of this rule “maintenance” means:

All activities associated with the protective care, **and** monitoring **of a hydro dam, a geothermal or hydroelectric power station, geothermal steamfields and associated structures, in order to monitor**, test and/or arrest the processes of decay, structural fatigue, erosion or dilapidation **of all associated structures** and includes maintenance of surrounds and water areas.

NOTE: For the purpose of this rule “minor upgrading” means:

Structural improvement, repair and replacement **or upgrade** of **components, or activities required for the continued safe and efficient operation** including worn or technically deficient parts of **any structure including** the powerhouse, hydro dams, separation plants, switchyards, intake, control and diversion structures, wells, pipes, tunnels, cables, other equipment and accessory buildings and structures **of similar character and scale**, and includes associated drilling, **vehicles, infrastructure, machinery**, testing, monitoring, earthworks and vegetation removal. Also the extension to existing Buildings and Structures, and the erection of new Buildings and Structures **up to 100m² in area and not exceeding the maximum height standard for the Rural Environment and the erection of any aerial, antennae or communication dish not exceeding 5m² in area located on top of a hydro or geothermal existing structure, subject to compliance with the Noise Performance Standard.**

Include reason(s) for your submission point

Contact supports the retention of Rule 4b.1.4 (being a continuation of the Rule in currently in the Rural Environment) with a number of minor amendments. This is the enabling rule that appropriately provides for the operation,

maintenance and minor upgrading renewable electricity generation activities in the General Rural Environment.

The term “Geothermal Areas” has been used rather than “Geothermal Steamfields” due to Section O of the Plan identifying and mapping Geothermal Areas.

A second clause has been added to the rule on the basis that Policy G of NPS-REG states:

“Regional policy statements and regional and district plans shall include objectives, policies, and methods (including rules within plans) to provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators.”

Activities of this nature tend to be temporary activity and any effects are easily remediated.

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: 93.51**

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

Amend Rule 4b.1.5 as follows:

- i. A commercial, industrial activity or home business which complies with the performance standards is a **permitted activity**.
- ii. A commercial, industrial activity or home business which does not comply with the performance standards is a **restricted discretionary activity**.

When considering activities under Rule 4b.1.5ii Council restricts the exercise of its discretion to the following matters:

- a. The daily vehicle movements expected to and from the allotment.
- b. The effect of the activity on the rural character of the area, having regard to visual effects and lighting effects.
- c. The effect of the activity on surrounding land uses (including reverse sensitivity effects) and how these effects can be managed onsite and/or mitigated.
- d. The hours of operation for the activity.
- e. The proposed signage associated with the activity.

Include reason(s) for your submission point

A typo needs to be corrected – The third paragraph should refer to Rule 4b.1.5ii.

Home businesses could include sensitive activities and need to avoid creating reverse sensitivity effects.

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.1.7 High voltage transmission lines **Points: 93.52**

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

Amend Rule 4b.1.7 as follows:

4b.1.7 Buildings and Structures in proximity to High voltage transmission lines

- i. Any building or structure (except network utilities and Renewable Electricity Generation Activities) located within 0 – 12 meters of a high-voltage transmission line is a **restricted discretionary activity**.

Include reason(s) for your submission point

Contact supports this rule as it seeks to ensure the safe operation of transmission lines. However, the heading of the rule needs to be more accurate.

In addition to network utilities, this rule should also provide an exception for renewable electricity generation activities (which are not necessarily network utilities).

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.1.8 Buildings within Outstanding Landscape Areas **Points: 93.53**

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

Retain Rule 4b.1.8 but amend the first exception to the rule as follows:

EXCEPTION: This rule will not apply to the erection of structures:

- a. Associated with existing renewable electricity generation activities including ~~W~~within Electricity Generation Core Sites.
- b. ...

Include reason(s) for your submission point

Contact supports this rule on the basis that it does not apply to buildings within Electricity Generation Core Sites, but there is no reason why it should not apply to all other existing renewable electricity generation activities.

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.1.9 Earthworks within Outstanding Landscape Areas **Points: 93.54**

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

Retain 4b.1.9 but amend the exception as follows:

EXCEPTION:

This rule will not apply to Earthworks associated with existing and/or consented renewable electricity generation activities including within Electricity Generation Core Sites.

Include reason(s) for your submission point

Contact supports this rule on the basis that it does not apply to earthworks within Electricity Generation Core Sites, but there is no reason why it should not apply to all other existing renewable electricity generation activities.

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: 93.55**

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

Retain 4b.2.1 but amend the exception as follows:

EXCEPTION:

This performance standard shall not apply to traffic movements involved in forest harvesting operations or existing and consented renewable electricity generation activities.

Include reason(s) for your submission point

Contact supports Rule 4b.2.1 subject to the exception being expanded to include renewable electricity generation activities.

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: 93.56**

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

Amend Rule 4b.2.5 as follows:

4b.2.5 Maximum building height

- i. 12 metres.
- ii. 5 meters in a height restricted area.

iii. 5 meters in an Outstanding Landscape Area.

iv. 15 meters for ~~renewable Electricity~~ ~~Generation~~ ~~activities~~ on land identified as a Geothermal Area in Section O ~~within an Electricity Generation Core Site~~.

EXCEPTIONS:

- ~~activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators including wind monitoring masts – no height limit~~
- Cranes being used as part of any construction or maintenance works for the duration of the works – no height limit.
- Drilling Rigs for up to 60 days per well ~~allotment~~ – no height limit.

Include reason(s) for your submission point

Contact seeks amendments to Rule 4b.2.5 to make the rule applicable to all renewable electricity generation activities within Geothermal Areas.

An additional exception has been added to the rule on the basis that Policy G of NPS-REG states:

“Regional policy statements and regional and district plans shall include objectives, policies, and methods (including rules within plans) to provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators.”

Activities if this nature tend to be temporary activity and any effects are easily remediated.

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: 93.57

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

Delete? Amend?

Seek amendment

Amend Rule 4b.2.6 as follows:

4b.2.6 Minimum building setbacks

i. 30 metre setback for dwellings and minor residential units from the front boundary.

ii. 15 metres from all other boundaries

iii. 25 metres in Outstanding Landscape Areas from all boundaries.

iv. 200 metres for buildings for the management of farmed animals from all boundaries.

v. There shall be no front boundary setback for buildings and activities associated with ~~Electricity Generation and Renewable Energy~~ ~~Electricity~~ Generation Activities on land identified as Geothermal Area in Section O ~~within an Electricity Generation Core Site~~ where the road extends over any power generation Building or Structure.

vi. There shall be no boundary setback for buildings and activities associated with ~~Renewable~~ Electricity Generation ~~Activities~~ on land identified as Geothermal Area in Section O ~~including~~ within an Electricity Generation Core Site

EXCEPTION:

For the purpose of this performance standard water tanks are not required to comply with the setback requirements in this standard.

Include reason(s) for your submission point

Contact seeks minor amendments to Rule 4b.2.6 to make it more accurate and workable.

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: 93.58

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

Delete? Amend?

Seek amendment

Amend Rule 4b.2.7 as follows:

4b.2.7 Minor residential units

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

i. All minor residential ~~units~~ or accommodation activity units shall:

- a. Be no larger than 100m² in size
- b. Be located no greater than 20 metres from the primary residential unit.
- c. Be located no closer than the existing primary residential unit on the same site to a Consent Area which is the subject of resource consents issued by the Waikato Regional Council for the take or discharge of geothermal fluid exceeding 1,000 tonnes per day provided that this clause shall not apply to properties more than 300m away from any aforementioned Consent Area.
- d. Share an accessway/driveway with the primary residential unit.

EXCEPTION:

Papakāinga

NOTE:

Minor residential units also include accommodation activities, tiny homes/houses, caravans and other structures used for accommodation for more than two consecutive months in a calendar year on the allotment.

Include reason(s) for your submission point

Minor residential units need to be located so that they do not create additional restrictions on renewable electricity generation activities by, for example, moving a point of noise compliance closer to the source of noise.

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: 93.59**

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

Amend Rule 4b.2.8 as follows:

4b.2.8 Commercial and industrial activities, and home businesses

- i. Any indoor or outdoor space used for commercial, industrial or home business purposes, shall have a gross floor area less than 100m² for indoor activities, or 100m² of land area for outdoor activities.
- ii. For home businesses the principal operator of the home business must be a permanent resident on the site to which the home business relates.

iii. Home businesses shall be located no closer than the existing primary residential unit on the same site to a Consent Area which is the subject of resource consents issued by the Waikato Regional Council for the take or discharge of geothermal fluid exceeding 1,000 tonnes per day provided that this clause shall not apply to properties more than 300m away from any aforementioned Consent Area.

EXCEPTION:

Home business or commercial activities within a Papakāinga.

Include reason(s) for your submission point

Home businesses need to be located so that they do not create additional restrictions on renewable electricity generation activities.

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: 93.60**

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

Contact supports this rule.

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.2.10 Maximum Noise - Construction Noise **Points: 93.61**

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

Contact supports this rule.

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.2.11 Maximum Noise - Electricity Generation Core Sites

Points: 93.62

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

Contact supports this rule.

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.2.12 Maximum Noise - Well Drilling and Testing

Points: 93.63

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

Contact supports this rule.

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.2.13 Maximum Noise - Other

Points: 93.64

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

Amend Rule 4b.2.13 as follows:

4b.2.13 Maximum Noise – Other

i. Nothing in the foregoing Performance Standards shall apply to farm animals including working dogs, and to agricultural and forestry vehicles, agricultural and forestry machinery or equipment (including mobile plant at produce packing facilities but excluding sawmilling equipment), operated and maintained in accordance with the manufacturer's specifications in accordance with accepted management practices (e.g. for milking, spraying, harvesting, packing, forest harvesting and the like). Provided that the activity shall comply with the requirements of S16 of the Resource Management Act 1991

ii. Nothing in the foregoing Performance Standards shall apply to sirens, circuit breakers, bursting discs, emergency or upset operating conditions and hydro spills associated with the operation of Renewable Electricity Generation Activities Core sites. Provided that the activity shall comply with the requirements of S16 of the Resource Management Act 1991.

Include reason(s) for your submission point

Contact supports this rule subject to minor amendments to ensure it applies to all applicable circumstances.

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.2.14 Parking, Loading and Access

Points: 93.65

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

Delete Rule 4b.2.14.

Include reason(s) for your submission point

Taupo District is a Tier 3 territorial authority. The NPS-UD sets out that tier 1, 2 and 3 territorial authorities must remove district plan rules, assessment criteria, policies and objectives that have the effect of setting minimum car parking rates as soon as practicable, no more than 18 months from the date of commencement of the NPS-UD.

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.2.15 Signage **Points: 93.66**

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

Retain Rule 4b.2.15.

Include reason(s) for your submission point

Contact supports this rule.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.1 Subdivision - General Rural Environment **Points: 93.67**

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

Retain Rule 4b.5.1 subject to an additional matter of control as set out in Rule 4b.5.3 (as per the relief below).

Include reason(s) for your submission point

Contact supports this rule subject to an additional matter of control as set out in Rule 4b.5.3 (as per the relief below).

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: 93.68**

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

Retain Rule 4b.5.2 subject to an additional matter of control as set out in Rule 4b.5.3 (as per the relief below).

Include reason(s) for your submission point

Contact supports this rule subject to an additional matter of control as set out in Rule 4b.5.3 (as per the relief below).

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: 93.69**

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

Amend Rule 4b.5.3 as follows:

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**.

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:

- a) 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 management of stormwater.
- 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.

- c) 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.
- d) The extent to which earthworks and vegetation removal is required to create vehicle tracks and building platforms.
- e) Any actual or potential effects on areas or features of cultural, historic, landscape or natural value as identified in the plan.
- f) The imposition of conditions in accordance with Sections 108 and 220 of the Resource Management Act 1991.
- g) Any potential adverse effects from Natural Hazards, including flood inundation or erosion from the District's waterways and Lakes.
- h) 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.
- i) [Any effects on the functioning of the Rural Environment including adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources.](#)

Include reason(s) for your submission point

Contact supports this rule with the inclusion of an additional matter over which control is reserved for controlled activities.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.4 Subdivision - Default Activity Status **Points: 93.70**

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

Retain Rule 4b.5.4.

Include reason(s) for your submission point

Contact supports this rule.

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: 93.71**

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

Retain Rule 4b.5.5.

Include reason(s) for your submission point

Contact supports this rule.

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: 93.72**

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

Retain Rule 4b.5.6

Include reason(s) for your submission point

Contact supports this rule.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.7 Subdivision - Outstanding Landscape Areas **Points: 93.73**

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

Retain Rule 4b.5.7.

Include reason(s) for your submission point

Contact supports this rule.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > 4 Rules and Standards > 4b Rural Environment > 4b.5 Subdivision Rules > 4b.5.8 Subdivision - Bonus Lots **Points: 93.74**

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

Retain Rule 4b.5.8.

Include reason(s) for your submission point

Contact supports this rule.

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: 93.75**

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

Retain Rule 4b.5.9.

Include reason(s) for your submission point

Contact supports this rule.

Provision: Plan Change 42 - General Rural and Rural Lifestyle Environments > Planning Maps **Points: 93.76**

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

Delete the proposed Rural Lifestyle Environment on Centennial Drive as shown on Figure 1 (attached / presented below) and retain the current Rural Environment (General Rural Environment).



Figure 1: Centennial Drive Proposed Rural Lifestyle Environment

Delete the parts of the proposed Rural Lifestyle Environment on Oruanui Road outlined in red as shown on Figure 2 (attached / presented below) and retain the current Rural Environment (General Rural Environment).



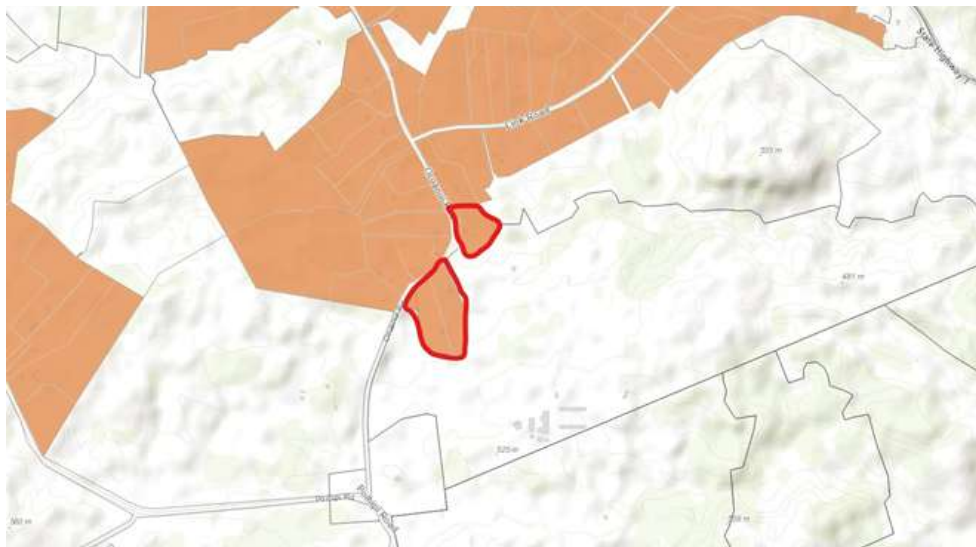


Figure 2: Oruanui Road Proposed Rural Lifestyle Environment

Delete the part of the proposed Rural Lifestyle Environment on Napier Road outlined in red as shown on Figure 3 (attached / presented below) and retain the current Rural Environment (General Rural Environment).



Figure 3: Napier Road (Bonshaw Park) Proposed Rural Lifestyle Environment

Delete the parts of the proposed Rural Lifestyle Environment on Tukairangi Road outlined in red as shown on Figure 4 (attached / presented below) and retain the current Rural Environment (General Rural Environment).





Figure 4: Tukairangi Road Proposed Rural Lifestyle Environment

Include reason(s) for your submission point

Contact opposes the rezoning of land on Centennial Drive to Rural Lifestyle Environment.

Existing land use character is a relevant factor when determining land use zoning, but it is not necessarily determinative of the outcome. There are a range other factors that need to be taken into account.

The separation of incompatible land use activities is one of the most fundamental principles of sound planning and resource management practice. A Rural Lifestyle Environment in this location would reinforce the ongoing existence, and enable the intensification, of rural residential activities which are incompatible with the nature and character of the surrounding environment (and planned future development including that which will be facilitated by the existing and planned future zoning pattern in the area). This includes large scale heavy industrial activities (including an expansion of the Centennial Industrial Environment), geothermal steamfield activities, electricity generation, a motorsport park, horse racing track and an aerodrome.

The Centennial Drive area is vitally important for enabling large scale industrial activities, noisy recreationally activities, and the utilisation of the Wairakei-Tauhara Geothermal System for renewable electricity generation purposes (the latter being a matter of national significance as recognised in the NPS for Renewable Electricity Generation). This area should not be compromised by an ability to increase and/or intensify the establishment of incompatible rural residential activities.

If Rural Lifestyle Environments are only located in appropriate locations, that outcome avoids the need to Contact (and others) to seek changes to the rules and performance standards relating to the Rural Lifestyle Environment to address the potential for reverse sensitivity effects to arise.

Contact opposes the rezoning of parts of the land on Oruanui Road to Rural Lifestyle Environment.

Existing land use character is a relevant factor when determining land use zoning, but it is not necessarily determinative of the outcome. There are a range other factors that need to be taken into account.

The separation of incompatible land use activities is one of the most fundamental principles of sound planning and resource management practice. A Rural Lifestyle Environment in this location would reinforce the ongoing existence, and enable the intensification, of rural residential activities which are incompatible with the nature and character of the surrounding environment to the south which includes Te Mihi Power Station and associated steamfield activities.

Additional wells are planning to be drilled in the area to the north of Te Mihi Power Station in accordance with resource consents held by Contact.

The utilisation of the Wairakei-Tauhara Geothermal System for renewable electricity generation purposes is a matter of national significance as recognised in the NPS for Renewable Electricity Generation. This area should not be compromised by an ability to increase and/or intensify the establishment of incompatible rural residential activities.

If Rural Lifestyle Environments are only located in appropriate locations, that outcome avoids the need to Contact (and others) to seek changes to the rules and performance standards relating to the Rural Lifestyle Environment to address the potential for reverse sensitivity effects to arise.

Contact opposes the rezoning of part of the land on Napier Road (known as Bonshaw Park) to Rural Lifestyle Environment. Specifically, Contact opposes the additional 'leg' of land extending to the west of Bonshaw Park along the Napier Road frontage. Contact recognised the 'sensitive' nature of Bonshaw Park as part of consenting the Tauhara Geothermal Development. The outcome includes a 100m setback from Bonshaw Park for surface activities undertaken by Contact. The additional leg of land would provide the ability for additional sensitive land uses to establish in closer proximity to areas which Contact holds resource consents (and land access rights) to undertake steamfield activities. This would constraint Contact's ability to exercise its resource consents and could limit the optimal utilisation of the Wairakei-Tauhara Geothermal System for renewable electricity generation purposes.

The utilisation of the Wairakei-Tauhara Geothermal System for renewable electricity generation purposes is a matter of national significance as recognised in the NPS for Renewable Electricity Generation. This area should not be compromised by an ability to increase and/or intensify the establishment of incompatible rural residential activities. If Rural Lifestyle Environments are only located in appropriate locations, that outcome avoids the need to Contact (and others) to seek changes to the rules and performance standards relating to the Rural Lifestyle Environment to address the potential for reverse sensitivity effects to arise.

Contact opposes the rezoning of part of the land on Tukairangi Road to Rural Lifestyle Environment.

Existing land use character is a relevant factor when determining land use zoning, but it is not necessarily

determinative of the outcome. There are a range other factors that need to be taken into account.

The separation of incompatible land use activities is one of the most fundamental principles of sound planning and resource management practice. A Rural Lifestyle Environment in this location would reinforce the ongoing existence, and enable the intensification, of rural residential activities which are incompatible with the nature and character of the surrounding environment to the north and east which includes Poihipi Power Station and associated steamfield activities.

The utilisation of the Wairakei-Tauhara Geothermal System for renewable electricity generation purposes is a matter of national significance as recognised in the NPS for Renewable Electricity Generation. This area should not be compromised by an ability to increase and/or intensify the establishment of incompatible rural residential activities.

If Rural Lifestyle Environments are only located in appropriate locations, that outcome avoids the need to Contact (and others) to seek changes to the rules and performance standards relating to the Rural Lifestyle Environment to address the potential for reverse sensitivity effects to arise.

Provision: Plan Change 43 - Taupō Industrial Zone

Points: 93.77

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

Contact seeks that Taupō District Council adopt PC43 as notified insofar as it relates to the 3.5 hectare block of land on the corner of Napier Road and the ETA, i.e. rezone it to Taupō Industrial Environment.

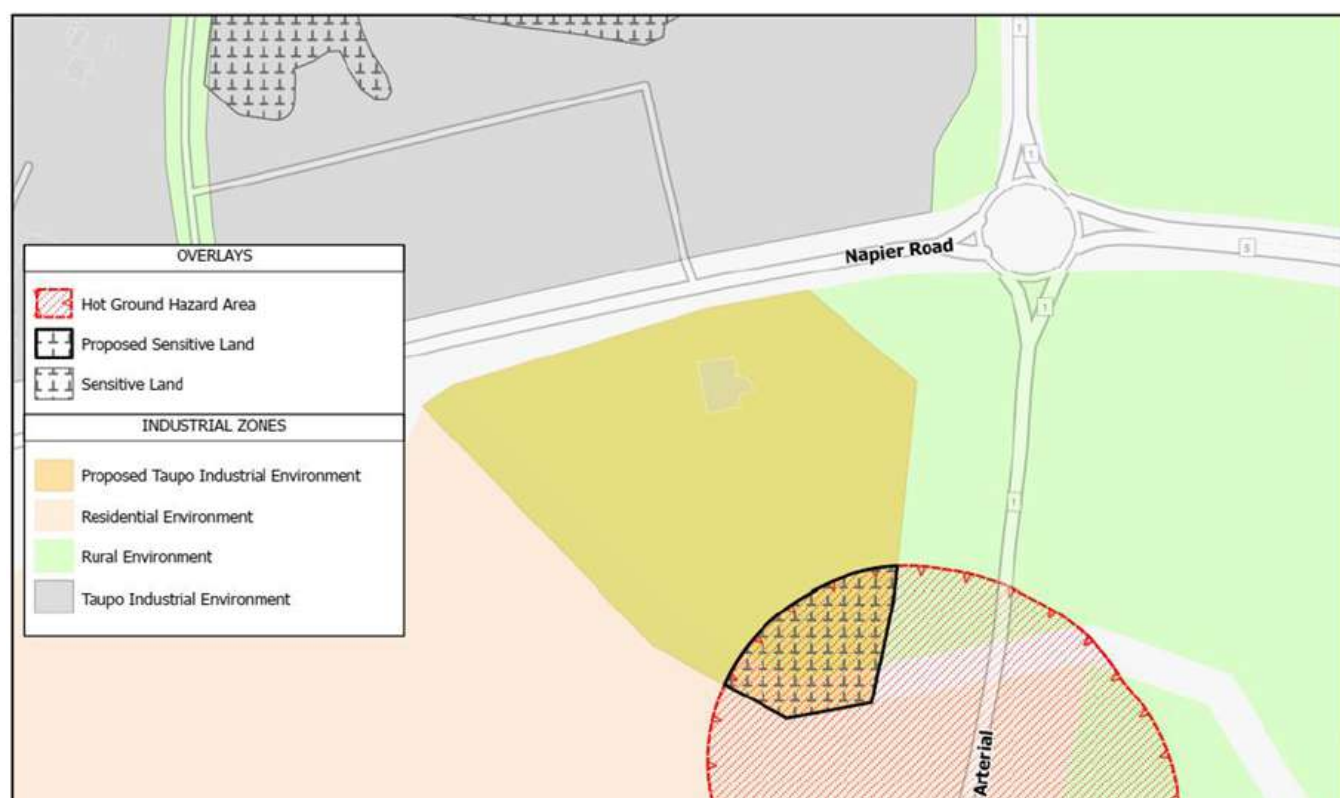
Contact seeks that its land on Broadlands Road not be rezoned to Taupō Industrial Environment and instead retain the current Rural Environment zoning.

Include reason(s) for your submission point

Contact supports PC43 in part and opposes it in part.

Napier Road Area

Contact supports the proposed rezoning of the 3.5 hectare block of land on the corner of Napier Road and the East Taupō Arterial (ETA) to Taupō Industrial Environment as shown on the plan below.

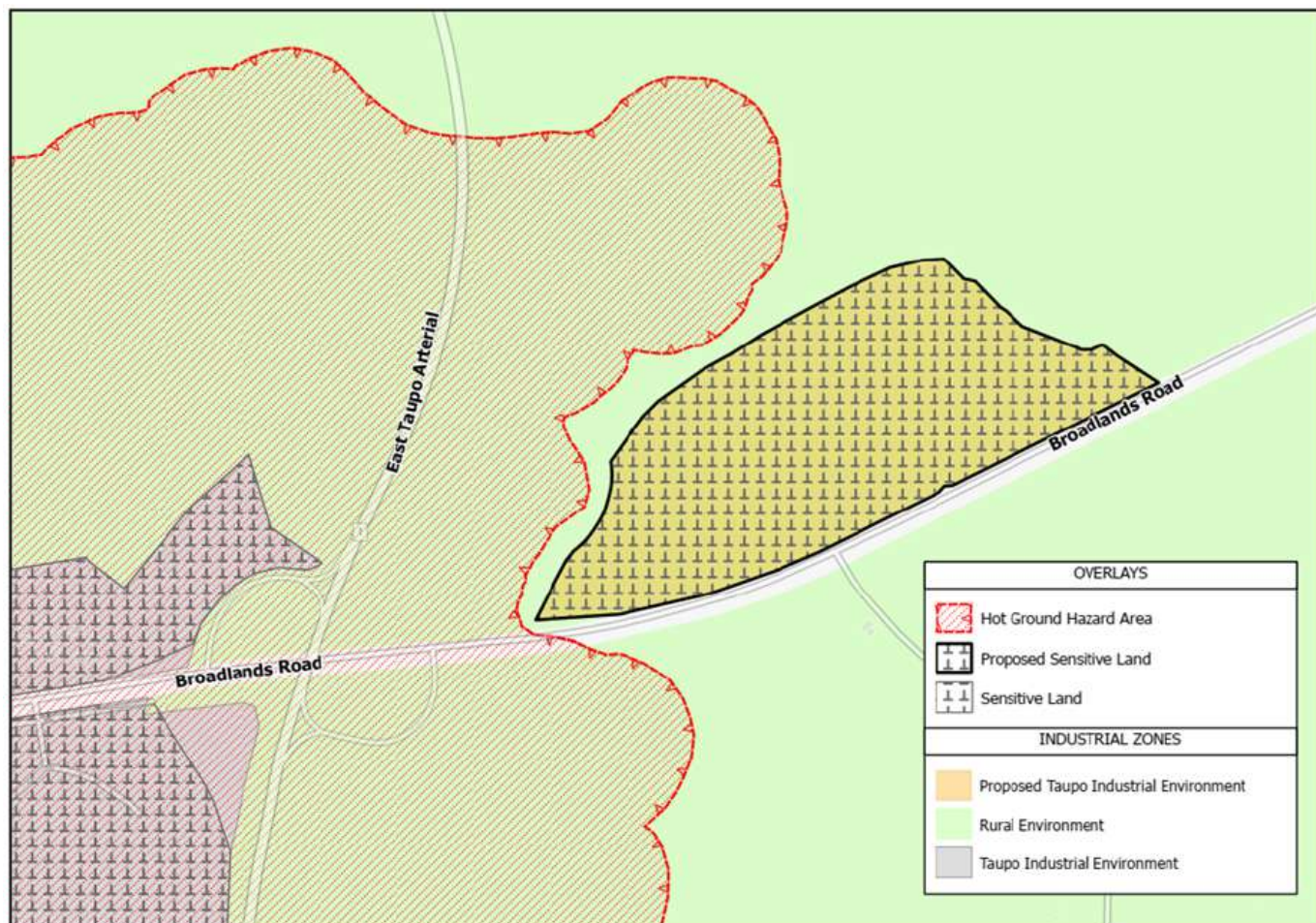




The current Rural Environment zoning of this land on the Taupō township side of the ETA is somewhat of an historical anomaly. An industrial zoning of this site is compatible with the surrounding environment including the land on the opposite side of Napier Road and Contact's Tauhara Geothermal Development Consent Area on the opposite side of the ETA.

Broadlands Road Area

The second area proposed to be rezoned as Taupō Industrial Environment as part of PC43 is on Broadlands Road to the east of the ETA as shown on the following plan.



The eastern half (approximately) of this area is land owned by Contact. It is unclear as to why Taupō District Council is proposing to rezone Contact's land in this locality to Taupō Industrial Environment.

Contact has previously advised Taupō District Council that it has no intention to develop (or allow others to develop) this part of its property for industrial purposes (at least in the foreseeable future). Contact is concerned that rezoning this land might create false expectations and the outcome will not assist Taupō District Council meet its obligations under the National Policy Statement on Urban Development 2020.

Attached Documents

File

No records to display.



First name: Joan
Last name: Forret

On behalf of:
 Pukawa D3 Trust

Postal address: Private Bag 3077, Waikato Mail Centre
Suburb:
City: Hamilton
Country: New Zealand
Postcode: 3240

Email: joan.forret@harkness.co.nz

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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
Submission Pukawa D3 Trust

Pukawa D3 Trust

Form 5

Submission on notified proposal for policy statement or plan, change or variation

[Clause 6](#) of Schedule 1, Resource Management Act 1991

Taupō District Plan

Name of submitter: Margaret Annette Asher, Janet Raukawa Galbraith and Edward Te Tui Hakopa as Trustees of the Pukawa D3 Trust.

This is a submission on Proposed Plan 38.

We could not gain an advantage in trade competition through this submission.

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

See attached **Schedule 1**.

We wish to be heard in support of our submission.

If others make a similar submission, we will consider presenting a joint case with them at a hearing.



Signature of submitter
(or person authorised to sign
on behalf of submitter)

Date: 09/12/2022

Electronic address for service of submitter: joan.forret@harkness.co.nz;
charlotte.muggeridge@harkness.co.nz

Telephone: 07 834 4662

Postal address Private Bag 3077, Hamilton, 3240

Contact person: Joan Forret

Schedule 1

This submission is on behalf of:

Margaret Annette Asher, Janet Raukawa Galbraith and Edward Te Tui Hakopa as Trustees of the Pukawa D3 Trust (“the Trust”) on the property referenced 602330 held as General Land.

Submission:

The land now held by the Pukawa D2 and D3 trusts represents the last remnants of the lands at Kuratau and Omori that were traditionally used by the tangata whenua as their gardens, dating from ancient times right up to the commencement of the Second World War. Their homes were situated around Lake Rotoaira and further up the mountain for defensive purposes. That land was not suitable for gardens, so the people would spend the spring and summer on the warmer, more fertile land close to the Lake to grow food to keep them through the rest of the year. The land was historically zoned residential.

The Trust agrees that the Significant Resource Management Issues section of the District Plan should be replaced with the new Strategic Directions section. The Trust is in general support of the directions but seeks further clarity on the status of the directions to the district plan.

The Tāngata Whenua clauses are sought to be strengthened, making the clauses more aligned with the Natural and Built Environments Bill (that the principles of te Tiriri o Waitangi will be given effect to) and that iwi management plans are recorded as being higher level documents than the district plan.

Changes to the Natural Environment Values clauses are sought to allow for environmental offsetting when appropriate (and to be consistent with the Natural Values chapter of the District Plan which enables activities which result in a Net Environmental Gain. Offsetting is considered an appropriate tool and should be an option able to be contemplated and reflected in the objectives and policies in the Strategic Directions chapter. Offsetting should be allowed after steps to avoid, remedy, and mitigate adverse effects have been considered, particularly where offsetting may give rise to a net environmental gain.

Details of the submission are on the following page.

Pukawa D3 Trust

Plan Section	Support/oppose	Relief sought	Reasons
<p>Chapter 2 Strategic Directions</p> <p>Overview</p>	<p>Support in part</p>	<p>The following chapter provides an outline of the key strategic and significant resource management matters for the Taupō district. This chapter includes objectives and policies to guide decision making at a strategic level.</p> <p>The order of the Strategic Directions reflects the status and importance of each Direction and its objectives and policies.</p> <p>The strategic objectives set the direction for the District Plan and help to implement the Council’s community outcomes for resource management practices. They are indicative of the matters which are important to the Taupō District community and Council and reflect the intended outcomes to be achieved through the implementation of the District Plan.</p> <p>The strategic directions will be particularly relevant for any future changes to the Plan and any significant resource consent applications where there is a requirement to consider District Plan policy. The strategic directions must</p>	<p>Clear understanding of the legal status of the directions is required to assist planners when making assessments against the district plan.</p> <p>To assist with the importance and status of each direction, a hierarchy should be established.</p> <p>Establishing a hierarchy for the directions is needed to ensure Tangata Whenua – Direction 1 is regarded on all decision making processes to take into account the Principles of te Tiriti o Waitangi. That outcome is anticipated in clause 4 of the Natural and Built Environment Bill.</p>

Pukawa D3 Trust

		<p>be considered in all resource consent applications and plan changes.–This chapter should be read as a whole and applied across the district and all zonings unless the provisions relate to a specific zoning or part of the District.</p> <p>This chapter does not include rules. Relevant rules can instead be found in the chapters under the District Wide and Area Specific headings of the Plan.</p>	<p>It is not clear why particular zoning would not be subject to overarching strategic directions.</p>
<p>Chapter 2 Strategic Directions Tāngata Whenua</p> <p>Objective 2.1.2.1</p>	<p>Support in part</p>	<p>The values, rights and interests of Taupō District mana whenua are listened to, recognised and protected. (moved to be objective 4)</p>	<p>A lot of planning processes are about listening to mana whenua.</p>
<p>Chapter 2 Strategic Directions Tāngata Whenua</p> <p>Objectives 2.1.2.2, 3, 4, and 5</p>	<p>Support</p>	<p>2. Mana whenua are a partner in District Plan planning and decision making. (moved to be objective 5)</p> <p>3. Resource management planning and decision making reflects tikanga, mana whakahaere, Kaitiakitanga, manaakitanga, whakapapa, mautaranga māori and te whanake (moved to be objective 6).</p>	<p>Mana whenua are a partnership and this relationship should be acknowledged.</p> <p>A hierarchy of these directions should be followed, outlined in green is the order in which these should be.</p>

Pukawa D3 Trust

		<p>4. Support development on Māori land that meet the needs of those landowners and respects the exercise of kaitiakitanga, self-determination and the relationship of tāngata whenua with their land, water, significant sites and Wāhi tapu. (moved to be objective 3)</p> <p>5. Māori are supported to develop their ancestral lands for their social, economic and cultural wellbeing. (moved to be objective 2)</p>	
<p>Chapter 2 Strategic Directions Tāngata Whenua</p> <p>Objective 2.1.3.6</p>	Support in part	<p>The principles of te tiriti o Waitangi are must be taken into account through District Plan planning and decision making.</p> <p>(moved to be objective 1)</p>	<p>Clause 4 Natural and Built Environment Bill.</p>
<p>Chapter 2 Strategic Directions Tāngata Whenua</p> <p>Policies 2.1.3.1, 2, 3, 4, 5, 6, 7 and 9</p>	Support	<p>1. Recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu (sacred sites), and other taonga (treasures).</p> <p>2. Provide for development on Māori land that enables tāngata whenua:</p> <ul style="list-style-type: none"> a. to act in a way that is consistent with their culture and traditions b. to fulfil cultural, economic and social aspirations of those owners c. enhance their ability to exercise kaitiakitanga 	

		<p>d. strengthens their relationships with land, water, significant sites and Wāhi tapu.</p> <p>3. Recognise the importance of mātauranga Māori, kaitiakitanga and tikanga Māori in landuse planning and decision making.</p> <p>4. Recognise and support opportunities for tāngata whenua to exercise their customary responsibilities as mana whenua and kaitiaki.</p> <p>5. Recognise the wider constraints on the utilisation and development of māori land as different from land in freehold title.</p> <p>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.</p> <p>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.</p> <p>9. Recognise and support the incorporation of mātauranga Māori principles into the design,</p>	
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Pukawa D3 Trust

		development and/or operation of land use activities.	
Chapter 2 Strategic Directions Tāngata Whenua Policy 2.1.3.8	Support in part	Recognise that iwi management plans are higher order statutory documents in decision making, and the importance of iwi environmental management plans in providing important guidance and direction on the sustainable use and development of the environment and natural resources.	Making it clear that the iwi management plan takes precedence over the district plan. “Higher order statutory documents” is the terminology used in the section 32 report.
Chapter 2 Strategic Directions Natural Environment Values	Support in part	The Taupō district is characterised by important landscapes and natural areas. These areas are a strong part of the identity to the district and are valued by the local communities and mana whenua and some also hold importance nationally. As well as being an important part of the districts identity, these areas also have a range of important social, cultural and environmental (including intrinsic) values. The effects of human activities such as built development, vegetation clearance and land development etc. can significantly alter the character of the environment resulting in the loss of these areas and their values, if completed with little regard to the environment. While parts of the District have been significantly	Natural areas are valued by mana whenua. Not all areas hold national importance. It needs to be clear that some areas are regarded nationally. Built development is needed, a balance needs to be met.

Pukawa D3 Trust

		<p>modified by human activity, vast areas of the natural landscape remain.</p> <p>These areas are on a range of public (reserve, forest and national parks) and private tenure. There is also a high proportion of these areas on māori land throughout the District which can impacts the ability of māori landowners in to undertaking development on their ancestral lands.</p>	
<p>Chapter 2 Strategic Directions Natural Environment Values</p> <p>Objective 2.6.2.1</p>	Support	Recognise the importance of the districts natural values and landscapes and their significance to the Taupō Districts communities and identity.	
<p>Chapter 2 Strategic Directions Natural Environment Values</p> <p>Objective 2.6.2.2</p>	Support in part	The protection of the natural values of areas of significant indigenous vegetation and significant habitats of indigenous fauna from the adverse effects of inappropriate development, including through offsetting to result in a net environmental gain.	Offsetting is a recognised tool.
<p>Chapter 2 Strategic Directions Natural Environment Values</p> <p>Objective 2.6.2.3</p>	Support in part	Activities which will lead to the enhancement of indigenous biodiversity values will be recognised and provided for, including activities used as an environmental offset.	Offsetting is a recognised tool.

Pukawa D3 Trust

Chapter 2 Strategic Directions Natural Environment Values Objective 2.6.2.4		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, as well as using land to provide for their communities as Māori see appropriate .	Restrictions have been placed by Council over Māori land tenure, which resulted in present vegetation growing over land that was always used as gardens. Over the past 20 years, the Trust has spent over \$1m to comply with Council in an endeavour to use their own land.
Chapter 2 Strategic Directions Natural Environment Values Objective 2.6.2.5 and 7	Support	5. The protection of outstanding landscape areas from inappropriate land use and development which may adversely affect their landscape attributes. 7. The natural character of riparian margins are preserved, and enhanced where appropriate, and protected from inappropriate subdivision, use and development.	Support in that it is linked to 'outstanding landscapes'.
Chapter 2 Strategic Directions Natural Environment Values Objective 2.6.2.6	Support	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.	Relationship should be recognised.
Chapter 2 Strategic Directions Natural Environment Values Policy 2.6.3.1	Support in part	Protect the natural values of areas of significant indigenous vegetation and significant habitats of indigenous fauna from land use and development activities that will	Restrictions have been placed by Council over Māori land tenure, which resulted in present vegetation growing over land that was always used as gardens. Offsetting should

Pukawa D3 Trust

		have more than minor adverse effects on the ecological values that cannot be offset. and processes important to those areas.	be available as a tool to achieve a net environmental gain.
Chapter 2 Strategic Directions Natural Environment Values Policy 2.6.3.2, 3, 4, 6	Support	2. Support and facilitate those activities which will lead to the long term protection and or enhancement of indigenous biodiversity values. 3. Recognise and provide for tāngata whenua in their role as kaitiaki of the natural values on their lands and the wider district. 4. Activities must recognise and maintain the attributes of identified outstanding natural features and landscapes and not have any more than minor adverse effects on them. 6. Recognise the contribution made by landowners to the protection and enhancement of areas of natural values and landscapes.	Agree that areas can be supported.
Chapter 2 Strategic Directions Natural Environment Values Policy 2.6.3.5	Support in part	5. Encourage the protection, enhancement and restoration of natural and landscape value areas, including by Supporting opportunities for tāngata whenua to exercise their customary responsibilities as mana whenua and	Allow tāngata whenua to decide what is best for their land.

Pukawa D3 Trust

		kaitiaki in restoring, protecting and enhancing these areas.	
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Organisation:

Heritage New Zealand Pouhere Taonga

First name: Carolyn**Last name:** McAlley**Postal address:****Suburb:****City:****Country:** New Zealand**Email:** cmcalley@heritage.org.nz**Daytime Phone:** 07 577 4535

- 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 -HNZPT Coverpage
PDF - District Plan Submission - HNZPT



08 December 2022

File ref: LA054

District Plan Changes 38-43,
Taupō District Council,
Private Bag 2005,
Taupō Mail Centre, 3352.
ATTN: Gareth Green - Chief Executive Officer

Dear Gareth,

**FORM 5: SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA
PLAN CHANGES 38-43 TO THE TAUPŌ DISTRICT PLAN.**

**TO: TAUPŌ DISTRICT COUNCIL
FROM: HERITAGE NEW ZEALAND POUHERE TAONGA (HNZPT)**

1. This is a submission on the Plan Changes 38-43 to the Taupō District Plan.
2. HNZPT could not gain an advantage in trade competition through this submission.
3. The specific provisions of the proposal that HNZPT's submission relates to are:
 - a. The historic heritage related aspects of Plan Changes 38-43 to the Taupō District Plan. The plan changes are as follows, with the plan changes that are the subject of this submission in bold and italics.
 - i. ***Plan Change 38 – Strategic Directions (full new chapter)***
 - ii. Plan Change 39 – Residential Coverage (increase from 30%-35%)
 - iii. Plan Change 40 – Town Centre Changes (building height, temp activities, and laneways tweak)
 - iv. Plan Change 41 – Removal of out-of-date fault lines
 - v. ***Plan Change 42 – Rural Lifestyle and General Rural Environments (full new chapters)***
 - vi. Plan Change 43 – Additional Taupō Industrial land

4. HNZPT's submission is:

HNZPT supports in part the Plan Changes 38-43 to the Taupō District Plan in so far as it concerns historic heritage but does seek amendments and additions to certain provisions. HNZPT's submission points are outlined in the appendices to this submission. The suggested amendments are intended to improve, clarify, qualify, and strengthen the provisions as they relate to the management and protection of historic heritage.

5. The reasons for HNZPT's positions are as follows:

HNZPT is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 for the identification, protection, preservation, and conservation



of New Zealand's historical and cultural heritage. HNZPT is New Zealand's lead historic heritage agency.

HNZPT has appreciated the opportunity to meet with Council staff regarding historic heritage matters and provide feedback to the draft versions of the plan changes and is pleased that the Proposed Taupō District Plan has been modified in line with some of HNZPT's earlier advice.

HNZPT acknowledges the challenges of only providing a partial Plan for review and from a submitter perspective a partial plan, that at this stage, only contains some of the elements to which HNZPT typically provide comments. Therefore, some of these comments from HNZPT anticipate other sections of the Plan.

HNZPT is concerned at the inadequate recognition and consideration of cultural and historic heritage values, and the lack of subdivision incentive measures. Heritage New Zealand looks forward to continuing to work with Taupō District Council on these important matters related to Historic Heritage within Plan Changes 38-43 to the Taupō District Plan.

6. Heritage New Zealand seeks the following decision from the local authority:

Refer to the table attached as Appendix A.

7. Heritage New Zealand wishes to be heard in support of this submission.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Sherry Reynolds', is written over a faint, light blue rectangular stamp.

P.P.

Sherry Reynolds
Director Northern Region



HERITAGE NEW ZEALAND
POUHERE TAONGA

Address for service:

Email: cmcalley@heritage.org.nz

Contact person: Carolyn McAlley

Attachments:

Appendix A: Submission point table of Heritage New Zealand Pouhere Taonga to the Plan Changes 38-43 to the Taupō District Plan.

Appendix 1 Submission points of Heritage New Zealand Pouhere Taonga to Plan Changes 38-34 to the Operative Taupo District Plan (Strike: abc =delete and underline: <u>abc</u> = addition) TDC = Taupo District Council			
Draft Proposed Plan: Part & provision number	Support or Oppose	Reasons for submission	Relief sought
Plan Change 38-Strategic Direction			
S32 Document Consideration of Regional Policy Statement/s requirements relating to providing for historic heritage	Oppose in part	<p>HNZPT is concerned that cultural and historic heritage is not robustly protected in the plan changes, through scheduling of cultural and historic heritage items, and appropriate protective objectives, policies and rules. HNZPT is also concerned that their feedback to an earlier version of the plan changes has been accepted in part only, for the following reason;</p> <p><i>"Heritage is important to our district however due to the small amount of sites it is not considered to be a significant issue. Policy 2.3.3.12 has been amended to include reference to heritage"</i>¹</p> <p>While there may be additional work related to heritage in upcoming plan changes of which HNZPT is not aware, at this time HNZPT does not consider that this approach meets the requirements of the RMA, where cultural and historic heritage are matters of national importance, and the Waikato Regional Policy Statement (HCV-01-Historic and Cultural Heritage) that requires the protection of cultural and historic heritage. The current low level of scheduling will not provide the necessary protection of Cultural and Historic Heritage and HNZPT seeks that additional work is undertaken to reflect the requirements of the regional plan with regard the identification and protection of historic heritage and associated objectives and policies.</p>	That the plan change is revised to provide improved protection of cultural and historic heritage.
2.1 Strategy Direction 1 Tangata Whenua 2.1.2 Objective	Support	<p>HNZPT supports Strategy Direction Tangata Whenua, as this objective suite will recognise and provide for the RMA 1991, s6 Matters of National Importance, in particular, s 6(e) <i>"the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga"</i></p>	That 2.1 Strategy Direction 1, Tangata Whenua 2.1.2 Objective, is retained.

¹ Summary of pre-consultation feedback and responses. Plan Changes 38-43 Taupo District Plan, TDC Website

Appendix 1

Submission points of Heritage New Zealand Pouhere Taonga to Plan Changes 38-34 to the Operative Taupo District Plan

(Strike: ~~abc~~ =delete and underline: abc = addition) TDC = Taupo District Council

Draft Proposed Plan: Part & provision number	Support or Oppose	Reasons for submission	Relief sought
2.1 Strategy Direction 1 Tangata Whenua 2.1.3 Policy	Support	HNZPT supports Strategy Direction Tangata Whenua, as this policy suite will recognise and provide for the RMA 1991, s6 Matters of National Importance, in particular, s 6(e) "the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga"	2.1 Strategy Direction 1, Tangata Whenua, 2.1.3 Policy is retained.
2.3 Strategic Direction 3 Urban Form and development 2.3.2 Objectives New objective related to historic heritage	Support in part	HNZPT is supportive of the recognition of tangata whenua with their culture, traditions and taonga within the objective, however, is concerned that there could be improved recognition for tangata whenua and also for historic heritage. As historic heritage is recognised later in the policy suite, HNZPT considers that it should also be recognised within the objectives. In that way the objective will also provide for Part 2- s6 Matters of National Importance, in particular, s 6(f) "the protection of historic heritage from inappropriate subdivision, use and development"	That 2.3 Strategic Direction 3, Urban Form and development 2.3.2 is retained and amended with the following addition: <u>8.Subdivision, use and development is designed to protect cultural and historic heritage values.</u>
3 Strategic Direction 3 Urban Form and development 2.3.3 Policy 7	Support	HNZPT supports Policy 7: "Provide for the development of Papakainga on Māori land to facilitate Māori occupation on their ancestral lands" HNZPT supports this part of the policy as this will assist to recognise and provide for the RMA 1991, s6 Matters of National Importance, in particular, s 6(e) "the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga"	That Policy 7 is retained.

Appendix 1

Submission points of Heritage New Zealand Pouhere Taonga to Plan Changes 38-34 to the Operative Taupo District Plan

(Strike: ~~abc~~ =delete and underline: abc = addition) TDC = Taupo District Council

Draft Proposed Plan: Part & provision number	Support or Oppose	Reasons for submission	Relief sought
2.3 Strategic Direction 3 Urban Form and development 2.3.3 Policy 12	Support in part	HNZPT supports in part Policy 12: <i>“Do not support subdivision and development which will inappropriately affect heritage sites or areas of important natural and landscape values,”</i> as the policy seeks to protect heritage sites against inappropriate subdivision and development, however the term “heritage sites” is not a defined term in the Operative Plan and the current scheduled sites are known as “Sites of historic value.” HNZZPT would welcome clarification around this matter, and any amendments required to provide clarity for the users of the Plan.	That Policy 12 is retained, subject to clarification regarding the meaning of the words “Heritage Sites”.
2.5 Strategic Direction 5 Significant and Local infrastructure 2.5.3 Policy	Oppose	HNZPT is concerned that there is no recognition in this section for the protection of cultural and historic heritage which can be vulnerable at the time of the installation of both significant and local infrastructure. This is particularly important given the low level of scheduling of cultural and historic heritage items within the Plan. HNZZPT is concerned that their feedback ² on the same matter to the earlier version of the plan change has been considered as accepted in part through the addition of a Policy (2.3.3.12) into the urban form and development section of the Plan. HNZPT does not consider that this approach is sufficient to provide for the protection of cultural and historic heritage, particularly given that significant and local infrastructure can be located outside the urban boundary.	That 2.5 Strategic Direction 5 Significant and Local infrastructure, 2.5.3 Policy is retained and policy 4 is amended as follows: <i>4: <u>Planning and development of infrastructure will consider the needs and wellbeing of current and future communities, including protecting cultural and historic heritage.</u></i>
Plan Change 42-General Rural and Rural Lifestyle Environments			
Rural Environments Chapter	Support in part	HNZPT is supportive of the proposed objectives and policies that relates to tangata whenua, however, is concerned that there are no objectives and policies related to historic heritage. Given that there are assessment criteria within the section related to	That the proposed objective and policy are retained, and amended as follows;

² Summary of pre-consultation feedback and responses. Plan Changes 38-43 Taupo District Plan, TDC Website

Appendix 1

Submission points of Heritage New Zealand Pouhere Taonga to Plan Changes 38-34 to the Operative Taupo District Plan

(Strike: ~~abc~~ = delete and underline: abc = addition) TDC = Taupo District Council

Draft Proposed Plan: Part & provision number	Support or Oppose	Reasons for submission	Relief sought
3b.2 Objectives and Policies HNZPT new proposed objective and policies		historic heritage values, HNPT considers that there should also be related objectives and policies. As per their earlier feedback to the draft plan changes, HNPT continues to seek relevant objectives and policies in this section of the Plan, to ensure that the Plan gives effect to Part 2- s6 Matters of National Importance, s 6(f) "the protection of historic heritage from inappropriate subdivision, use and development"	<u>New Objective: Protect historic heritage from the effects of subdivision, use and development.</u> <u>New Policy: Ensure subdivision, use and development are designed to avoid historic heritage and that any historic heritage is retained within one lot.</u>
Rural Lifestyle Environment 3b.3 Objectives and Policies HNZPT new proposed objective and policies	Support in part	HNPT is supportive of the proposed objectives and policies that relates to tangata whenua, however, is concerned that there are no objectives and policies related to historic heritage. Given that there are assessment criteria within the section related to historic heritage values, HNPT considers that there should also be related objectives and policies. As per their earlier feedback to the draft plan changes, HNPT continues to seek relevant objectives and policies in this section of the Plan, to ensure that the Plan gives effect to Part 2- s6 Matters of National Importance, s 6(f) "the protection of historic heritage from inappropriate subdivision, use and development"	That the proposed objective and policy are retained, and amended as follows; <u>New Objective: Protect historic heritage from the effects of subdivision, use and development.</u> <u>New Policy: Ensure subdivision, use and development are designed to avoid historic heritage and that any historic heritage is retained within one lot.</u>
General Rules General Rural Environment & Rural Lifestyle Environment	Support	HNPT is concerned, that aside from the earthwork rules in the outstanding natural landscape areas, the plan change does not provide for an earthwork activity, rule/performance standards and assessment framework for the consideration of earthworks activities and the impact that they may have generally, and on cultural and historic heritage sites.	That a rule and assessment framework is developed in relation to earthworks activities, that includes assessment criteria related to the impacts on cultural and historic heritage sites, including archaeological sites.

Appendix 1

Submission points of Heritage New Zealand Pouhere Taonga to Plan Changes 38-34 to the Operative Taupo District Plan

(Strike: ~~abc~~ = delete and underline: abc = addition) TDC = Taupo District Council

Draft Proposed Plan: Part & provision number	Support or Oppose	Reasons for submission	Relief sought
Earthworks rules and assessment criteria Proposed activity, Rules and assessment criteria.		<p>HNZPT is concerned that this may inadvertently lead to adverse effects on cultural and historic heritage. These types of sensitive and finite sites can be affected by even a small quantity of earthworks.</p> <p>HNZPT acknowledges the cultural and historic assessment criteria as part of the subdivision section as this would cover off new subdivisions etc, however remains concerned about activities that may occur on existing sites that would not be captured by the subdivision assessment criteria.</p> <p>HNZPT is supportive of the general earthworks assessment criteria (4b.4.8 Earthworks) in the existing operative plan that makes specific reference to archaeological sites and considers that this could be a guide to a framework as part of the plan change in relation to the consideration of the impacts of earthworks activities on cultural and historic heritage sites.</p>	
Subdivision- General Rural Environment Rule 4b.5.i, 4b.5.2.i, and 4b.5.3.i Assessment criteria	Support	<p>HNZPT are supportive of the subdivision assessment criteria related to the consideration of cultural and historic values at the time of subdivision. This will assist the provisions to give effect to 6(e) <i>"the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga"</i> and s 6(f) <i>"the protection of historic heritage from inappropriate subdivision, use and development"</i></p>	That the matters of assessment, in particular e): <i>"Any actual or potential effects on areas or features of cultural, historic, landscape or natural value as identified in the Plan"</i> are retained.
4b.5.8 Subdivision- Bonus Lots	Support in part.	<p>HNZPT is concerned that provision for bonus lots related to the permanent protection of cultural and historic heritage have not been included within the provisions of the plan change. HNZPT considers that bonus lots are a useful incentive tool for the ongoing protection of historic and cultural heritage or for the provision of access to Māori land.</p>	That the bonus lot provisions are amended to include the protection of cultural or historic heritage, or the provision of access to Māori land, as a reason to grant a bonus lot.

Appendix 1

Submission points of Heritage New Zealand Pouhere Taonga to Plan Changes 38-34 to the Operative Taupo District Plan

(Strike: ~~abc~~ =delete and underline: abc = addition) TDC = Taupo District Council

Draft Proposed Plan: Part & provision number	Support or Oppose	Reasons for submission	Relief sought
4b.5.8 Subdivision- Bonus Lots- Assessment criteria m	Support	HNZPT supports the assessment criteria related to the actual potential effects of bonus lot subdivision, in so far as they relate to cultural and historic values. This will assist the provisions to give effect to 6(e) <i>"the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga"</i> and s 6(f) <i>"the protection of historic heritage from inappropriate subdivision, use and development"</i>	That the matters of assessment, in particular m): <i>"Any actual or potential effects on areas or features of cultural, historic, landscape or natural value as identified in the Plan"</i> are retained.



First name: Andrea

Last name: Curcio Lamas

On behalf of:

Retirement Villages Association of New Zealand Incorporated

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

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?

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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Email address: Luke.Hinchey@chapmantripp.com;
Andrea.CurcioLamas@chapmantripp.com

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?	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.	Amend? 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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Suburb:
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Country: New Zealand
Postcode: 3330

Email: janehadiadup@hotmail.com

Daytime Phone: 07 3782043

- 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	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>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 provide for a level of amenity that is reflective of the planned urban environment.
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
				framework for papakāinga housing is in accordance with policy 1(a)(ii) of the NPS-UD.	Proposed changes are shown as strike through for deletion and <u>underlined</u> for proposed additional text.
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	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.	Amend 2.3.3(8) as follows: 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.

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:

Kāinga Ora – Homes and Communities
 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

ADDRESS FOR SERVICE:

*Kāinga Ora – Homes and Communities
PO Box 74598
Greenlane, Auckland
Attention: Development Planning Team
Email: developmentplanning@kaiingaora.govt.nz*

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.

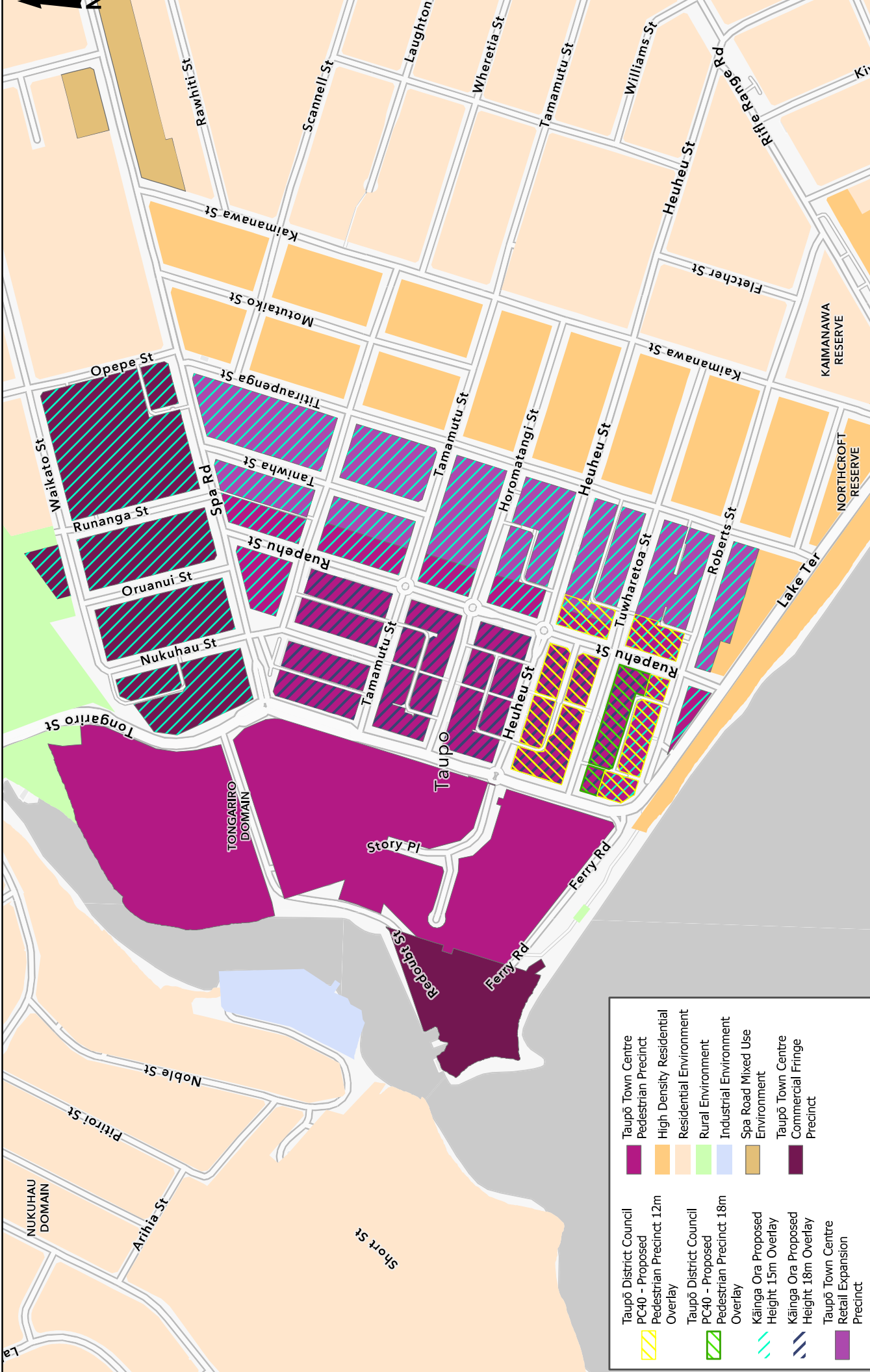
Table 1

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



	Taupō District Council PC40 - Proposed Pedestrian Precinct 12m Overlay
	Taupō District Council PC40 - Proposed Pedestrian Precinct 18m Overlay
	Kāinga Ora Proposed Height 15m Overlay
	Kāinga Ora Proposed Height 18m Overlay
	Taupō Town Centre Retail Expansion Precinct
	Taupō Town Centre Pedestrian Precinct
	High Density Residential Environment
	Residential Environment
	Rural Environment
	Industrial Environment
	Spa Road Mixed Use Environment
	Taupō Town Centre Commercial Fringe Precinct

Map Scale @ A4: 1:7,500

Metres

Revision	2.0
Status	Final
Author	BMMZ
Verifier	JFH
Date	08/12/2022

Taupō District Plan Change 40 Submission

Kāinga Ora Proposed Height Control



Project
Client
Discipline
Drawing Number

Kāinga Ora PC 40 Submission
Kāinga Ora
GIS
GIS-7774461-TDCPC40-01

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This map contains data derived in part or wholly from sources other than Beca, and therefore, no representations or warranties are made by Beca as to the accuracy or completeness of this information. Map intended for distribution as an A4 PDF document, the scale may be incorrect if printed at different scales. Contains Crown Copyright Data, Crown Copyright Reserved. Additional data from Taupō District Council, East Community Maps, Ordnance Survey, Esri, HERE, DeLorme, Mapbox, OpenStreetMap, Swatch, GEBCO, USGS, AeroGRID, IGN, and the GIS User Community.

**Organisation:**

Edison Consulting Group

First name: Tim**Last name:** Lester**On behalf of:**

The Lines Company Limited

Postal address: 127 Alexandra Street**Suburb:** Hamilton Central**City:** Hamilton**Country:** New Zealand**Postcode:** 3204**Email:** Tim.Lester@edison.co.nz**Daytime Phone:** 021 993223

- 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:

TLC will consider presenting a joint case with other submitters, who make a similar submission, at a hearing.

Attached Documents

File
PDF - District Plan Submission - The Lines Company Limited



The Lines Company Limited
NOTIFIED TAUPO DISTRICT PLAN CHANGES 38-43

To Taupo District Council

Sent via email to: districtplan@taupo.govt.nz

FROM: The Lines Company Limited (“TLC”)
PO Box 281
King Street East
Te Kuiti 3941

Date 08 December 2022



1.0 Introduction

- 1.1 The Lines Company ('TLC') appreciates the opportunity to engage with Council in regard to the Taupo District Council District Plan Review 2022 process.
- 1.2 TLC understand that the district plan review process has been undertaken in stages so as to comprehensively renew the Taupo Proposed District Plan (TPDP) - and which now has notified Plan Changes 38-43.
- 1.3 TLC is pleased to provide Taupo District Council with the following submission as applicable to the nature and scope of two (2) the proposed TPDP chapters: *Strategic Directions (PC 38)* and *General Rural and Rural Lifestyle Environments (PC 42)*.
- 1.4 Notwithstanding the above chapters, as further chapters or TPDP material is released by Council, TLC will again review such content and provide additional feedback as applicable to the Taupo District's safe and secure electricity supply network.

2.0 Submission Context

- 2.1 TLC owns and operates electricity distribution network assets and services over 18,000 customers and 24,000 connections throughout the King Country, Waitomo and Central Plateau.
- 2.2 TLC's network covers 13,700km² and stretches from Otorohanga in the north to Ohakune in the south.
- 2.3 Whilst most of TLC's connected customers are residential, TLC also supply electricity to major industrial businesses in and around the Taupo District (Mangakino, Whakamaru, and south to Turangi).
- 2.4 In providing electricity distribution line services, TLC operates and maintains:
 - *4500km of lines*
 - *35,000 power poles*
 - *5000+ transformers*
 - *30+ zone substations*
 - *14 repeater sites to carry voice and data signals*
 - *250 remote controlled switches*
 - *10 load control points*
- 2.5 TLC is committed in its regulatory obligation to provide consumers with a safe, effective and secure supply of electricity.
- 2.6 It is in the context of providing Taupo Businesses and Communities within the TLC distribution network with a safe and secure electricity supply that this submission has been prepared – particularly in regard to the District's strategic directions, as well as in regards to the Districts Rural and Rural Residential environments.
- 2.7 When Council release the TPDP chapter bundle which includes Network Utilities, a detailed technical submission will be provided due to having more direct relevance to the electricity



distribution network; however, notwithstanding the scope and coverage of PC38 and PC42 matters, the following submission has been prepared at a commensurate level to the matters most appropriate to TLC development and operations.

3.0 Lifeline Utility

- 3.1 Further to the above context, it is relevant to note that TLC also provides Lifeline Utility Services.
- 3.2 The Civil Defence and Emergency Management (CDEM) Act 2002 stipulates the responsibilities and roles of key organisations that provide an essential service within New Zealand.
- 3.3 TLC's core business is electricity distribution, and hence is an essential service under the CDEM Act; consequently, TLC's assets are statutorily classified as a Lifeline Utility.
- 3.4 As a *Lifeline Utility* asset owner, TLC must ensure that – at the strategic level -their network is able to function to the fullest possible extent (even at a diminished capacity level) during and after a natural hazard emergency; hence, providing resilience to the communities which they serve.
- 3.5 As a consequence of this statutory responsibility TLC have a significant strategic interest in the Taupo District (western and southern areas) so as to ensure their operational environment has appropriate regulatory and strategic acknowledgement under PC38 and PC42 in delivering a resilient, safe and secure supply of electricity to Taupo businesses and communities.

4.0 Submission

- 4.1 TDC are rolling out their comprehensive District Plan review process and are currently inviting further public consultation, and interested party feedback, on themes addressed as far back as 2019.
- 4.2 Notwithstanding the previous feedback provided to TDC by TLC, PC38 and PC42 are very important for network utility operators as strategic direction and rural subdivision and land use development activities proposed throughout the Taupo District will often instigate customer driven network utility upgrading and development. Therefore, TLC's feedback is in the context of infrastructure provisions being appropriately set in the TPDP review process.
- 4.3 TLC has reviewed the Strategic Direction and Rural Environment plan change documents – and consequently has provided specific comment in relation to proposed objectives, policies, rules and performance standards. TLC has adopted a submission format that identifies a specific provision, indicative level of support, and makes a subsequent statement on the reasoning behind the level of support and desired outcome.
- 4.4 Overall, TLC submits that some further refinement is required to PC 38 and PC42 to ensure that the TPDP chapters are able to be effectively implemented and understood; as well as to enhance particular provisions in order to provide for the importance of electricity infrastructure.
- 4.5 The reasons for these changes and the specific relief sought by TLC to address its concerns which are set out in the table below. If the specific relief (proposed wording amendments) is not accepted by



Council, TLC alternatively requests that appropriate, alternative, amendments be made to the provisions to give effect to the concerns raised by TLC.

- 4.6 TLC would like to take this opportunity to acknowledge the District Plan Review Team meticulously adopting feedback from TLC in the pre-consultation stages of the currently notified chapters. It is because of Council's acceptance of a number of comments previously provided by TLC that the overall content within PC38 and PC42 are well considered, robust, and more importantly reflect the appropriate context for the safe and secure supply of the District's electricity distribution network.

Signature for and on behalf of The Lines Company Limited:

 Tim Lester
 021 993 223
 tim.lester@edison.co.nz

Address for service:

The Lines Company Limited
 c/- Edison Consulting Group Ltd
 PO Box 875
 Hamilton 3240
 Attention: Tim Lester

- TLC could not gain an advantage in trade competition through this submission.
- TLC is not directly affected by an effect of the subject matter of the submission that:
 - (a) adversely affects the environment; and
 - (b) does not relate to trade competition or the effects of trade competition.
- TLC wish to be heard in support of their submission.
- TLC will consider presenting a joint case with other submitters, who make a similar submission, at a hearing.



SPECIFIC PROVISION	POSITION	REASON FOR SUBMISSION	RELIEF SOUGHT
<i>Plan Change 38 to the Taupō District Plan: Strategic Directions</i>			
2.3.2 Objectives	<p>1. <i>The district develops in a cohesive, compact and structured way that:</i></p> <p>...</p> <p>c. <i>ensures infrastructure is efficiently and effectively integrated with land use; and</i></p> <p>...</p>	<p>TLC acknowledge the high-level purpose of this objective and consider the relevant sub clauses are appropriate to be included.</p> <p>TLC is particularly supportive of the wording of sub clause c) in that 'infrastructure' – including the electricity distribution network – is to be integrated with development across the district.</p>	<p>TLC seek that Objective 2.3.2(1)c is retained as current drafted.</p>
<p>2. <i>Subdivision, use and development of land will be consistent with TD2050 2018 to maximise the efficient use of zoned and serviced urban land and is co-ordinated with the provision of cost effective infrastructure.</i></p>	<p>Support</p>	<p>TLC supports sub-objective 2 to the extent that it recognises that strategic growth is to be planned in such a way as to coordinate the provision of cost effective infrastructure.</p> <p>Such strategic direction appropriately reflects the broader term “infrastructure” which is taken to include both Council owned and non-Council owned infrastructure.</p> <p>TLC are in support of the broader infrastructure coverage implied under the objective sub-clause.</p>	<p>TLC seek that Objective 2.3.2(2) is retained as current drafted.</p>
<p>4. <i>Development is serviced by an appropriate</i></p>	<p>Support</p>	<p>TLC support sub-clause 4 of this objective as</p>	<p>TLC seek that 2.3.2(4) is retained as</p>

SPECIFIC PROVISION	POSITION	REASON FOR SUBMISSION	RELIEF SOUGHT
		<p>it suitably recognises the strategic importance to development across the district being held by effective infrastructure provision.</p> <p>Maintaining and developing the District's electricity supply network is a strategic undertaking by TLC asset managers – hence, aligning future development with well-planned electricity network extensions and upgrades is a vital strategic consideration that needs to be reflected in the TDP.</p>	<p>Text to add shown as <u>underlined</u></p> <p>Text to delete shown as struckthrough</p> <p>current drafted.</p>
<p>2.3.3 Policy</p>	<p>Support</p>	<p>For the same reasons expressed above (Objective 2.3.2(2)), TLC wish to register support for this policy.</p> <p>Master planning of new urban growth cells will enable TLC to plan and prepare the applicable upgrades or capacity assessments for their network to service the expected load growth.</p>	<p>TLC seek that Policy 2.3.3(1) is retained as current drafted.</p>
<p>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.</p>	<p>Support</p>	<p>TLC support this policy and agree that infrastructure is to be effectively coordinated with future growth management.</p> <p>TLC strategically operate and develop their electricity distribution network through</p>	<p>TLC seek that Policy 2.3.3(3) is retained as current drafted.</p>

SPECIFIC PROVISION	POSITION	REASON FOR SUBMISSION	RELIEF SOUGHT
		both medium and long-term asset management planning. Being able to align strategic asset management with Council's strategic growth management planning is an important function for TLC as it allows for the provision of infrastructure to be undertaken carefully, responsively and efficiently.	
4. <i>Avoid fragmented development that results in inefficiencies in the provision of infrastructure and landuse.</i>	Support	TLC support this policy sub-clause because it clearly links land use with the provision of infrastructure such as the electricity distribution network. TLC support the use of the term "infrastructure" as it applies broadly to both Council and non-Council owned infrastructure.	TLC seek that Policy 2.3.3(4) is retained as current drafted.
5. <i>Require urban subdivision and land developed to be efficiently and effectively serviced by infrastructure (including development and additional infrastructure), according to the capacity limitations of that infrastructure.</i>	Support in part	Whilst TLC support the intent of this policy sub clause, it is considered unnecessary to reference development and additional infrastructure. Subdivision and land use (urban) cannot occur without being serviced by infrastructure and given the strategic level of the policy, it is not particularly beneficial to differentiate between 'types' of	TLC seek that Policy 2.3.3(5) is retained; however, the following amendment to the sub-clause as follows: 5. <i>Require urban subdivision and land developed to be efficiently and effectively serviced by infrastructure (including development and additional infrastructure), according to the capacity limitations of that infrastructure.</i>

SPECIFIC PROVISION	POSITION	REASON FOR SUBMISSION	RELIEF SOUGHT
		<p>necessary infrastructure.</p> <p>TLC support reference in the policy sub clause clearly associating infrastructure provision with capacity.</p>	<p>Text to add shown as <u>underlined</u></p> <p>Text to delete shown as struckthrough</p>
<p>2.5 STRATEGIC DIRECTION 5 SIGNIFICANT AND LOCAL INFRASTRUCTURE</p>	<p>Chapter preamble</p> <p>...</p> <p><i>The Taupō District is also home to Regionally Significant Infrastructure including municipal waste water systems, the telecommunications and electricity networks.</i></p> <p>...</p>	<p>TLC are supportive of the preamble to section 2.5 – particularly in regard to the electricity network’s provision of Regionally Significant Infrastructure.</p> <p>Regionally Significant Infrastructure is currently not defined in the Operative Taupo District Plan; hence, qualifying statements such as that provided in the preamble confirm the regionally significant role that electricity networks play in the Taupo District</p>	<p>TLC seek that the preamble wording in section 2.5 of PC38 is retained as current drafted.</p>
<p>2.5.2 Objectives</p>	<p>1. <i>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.</i></p> <p>3. <i>Land use in the District will not adversely affect the capacity and the safe and effective</i></p>	<p>As a Regionally Significant Infrastructure provider, as well as a lifeline utility operator, TLC support this objective sub-clause as it appropriately acknowledges the wider benefits of TLC providing electricity distribution and supply functions across the District.</p> <p>TLC support this objective in the context of recognising and avoiding the actual and</p>	<p>TLC seek that Objective 2.5.2(1) is retained as current drafted.</p> <p>TLC seek that Objective 2.5.2(3) is retained as current drafted.</p>



	SPECIFIC PROVISION	POSITION	REASON FOR SUBMISSION	RELIEF SOUGHT
	<p><i>functioning of nationally and regionally significant and local infrastructure required to service existing and future communities.</i></p>		<p>potential adverse effects of reverse sensitivity on the regionally significant electricity sub transmission network.</p> <p>This sub clause would apply to rural or rural residential subdivision, and consequently ensure that any such development would have to provide an assessment where potential reverse sensitivity effects could arise.</p> <p>TLC agree that such a consideration is appropriately acknowledged at the strategic level, and hence will ensure that subsequent chapters and provisions in the TPDP will have to take account of any given development, and the potential adverse effects of this development on TLC's electricity distribution network.</p>	<p>Text to add shown as <u>underlined</u></p> <p>Text to delete shown as struckthrough</p>
<p>2.5.3 Policy</p>	<p><i>2. Recognise the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure.</i></p>	<p>Support</p>	<p>As a Regionally Significant Infrastructure provider, TLC is supportive of this policy sub clause, particularly in regard to functional and operational need associated with linear infrastructure.</p>	<p>TLC seek that Policy 2.5.3 is retained as current drafted.</p>

SPECIFIC PROVISION	POSITION	REASON FOR SUBMISSION	RELIEF SOUGHT
	Support	<p>TLC consider that this policy sub clause adequately responds to proposed Objective 2.5.2(3) as addressed above.</p> <p>TLC support the policy sub clause to the extent that it adequately recognises and protects against the actual and potential adverse effects of development reverse sensitivity on existing infrastructure</p>	<p>Text to add shown as <u>underlined</u></p> <p>Text to delete shown as struckthrough</p>
<p>3. Subdivision, land use and development will not adversely affect (including reverse sensitivity effects) the effective and safe functioning of infrastructure</p>	Support	<p>TLC support this strategic policy sub clause as it recognises that the provision of infrastructure, such as the electricity distribution network, needs to not only cater to a short-term development capacity (or load), but also needs to incorporate future load growth associated with a communities growth.</p> <p>TLC are supportive of future proofing infrastructure capacity – which in a practical example could include such undertaking as placing cable ducting within new sections of transportation corridors so as to allow for quick and efficient capacity upgrading at a future point in time.</p>	<p>TLC seek that Policy 2.5.3(4) is retained as current drafted.</p>
<p>4. Planning and development of infrastructure will consider the needs and the wellbeing of current and future communities.</p>	Support	<p>TLC are supportive of this policy sub clause as it will advise plan users and Council that</p>	<p>TLC seek that Policy 2.5.3(5) is retained as</p>
<p>5. Recognise that infrastructure can have important environmental, economic, cultural</p>	Support		

SPECIFIC PROVISION	POSITION	REASON FOR SUBMISSION	RELIEF SOUGHT
		not all adverse effect associated with the provision of infrastructure can be avoided, remedied or mitigated – yet such actual or potential adverse effects can be some-what off set through the benefits that are brought about through infrastructure provision.	Text to add shown as <u>underlined</u> Text to delete shown as struckthrough current drafted.
Plan Change 42 – General Rural and Rural Lifestyle Environments			
Objective 3b.2.4 Other activities	<i>Māori cultural activities, tourism activities, visitor accommodation and renewable electricity generation and transmission activities are enabled in the General Rural Environment.</i>	TLC support in principle this objective as is adequately recognises the necessity for non-rural activities that can take place in the Rural Environment. Notwithstanding this support, TLC consider it appropriate to include a reference to sub transmission activities so as to avoid confusion with the electricity transmission function of Transpowers National Grid network. TLC's sub transmission network includes high-voltage lines of 11kV and 33kV, which are common features within the Rural Environment. Such sub transmission lines also convey renewable electricity generation to Transpowers Grid; consequently, recognising	TLC seek the following amendment to Proposed Objective 3b.2.4: <i>Māori cultural activities, tourism activities, visitor accommodation and renewable electricity generation and transmission (including sub transmission) activities are enabled in the General Rural Environment.</i>

SPECIFIC PROVISION	POSITION	REASON FOR SUBMISSION	RELIEF SOUGHT
		and distinguishing sub transmission lines (TLC) and Transmission lines (Transpower) is considered to be appropriate in regard to the proposed objective.	Text to add shown as <u>underlined</u> Text to delete shown as struckthrough
Objective 3b.2.6 Impacts on infrastructure	Support	TLC support this policy as it broadly meets the requirements for TLC in providing electricity distribution and supply functions across the District.	TLC seek that Objective 3b.2.6 is retained as current drafted.
Policy 3b.2.13 Avoiding reverse sensitivity	Support	TLC support this policy in relation to the safe and efficient operation of the distribution network located with the district's rural environment. Examples of such activities that could have an adverse effect could relate to earthworks, and the potential effects such soil disturbance could have on support structures or in relation to maintaining clearance to lines through site contouring.	TLC seek that Policy 3b.2.13 is retained as current drafted.
Objective 3b.3.2 Avoid reverse sensitivity	Support	TLC firmly support the protection for rurally located electricity distribution network from the adverse effects of reverse sensitivity. TLC are also supportive of the use of the word "avoided" as it sends a strong message of the need to manage reverse sensitivity effects.	TLC seek that Objective 3b.3.2 is retained as current drafted.

SPECIFIC PROVISION	POSITION	REASON FOR SUBMISSION	RELIEF SOUGHT
<p>Rule 4b.1.7 High voltage transmission lines i</p> <p><i>i Any building (except network utilities) located within 0 – 12 meters of a high voltage transmission line is a restricted discretionary activity.</i></p> <p><i>When considering activities under Rule 4b.1.7 Council restricts the exercise of its discretion to the following matters:</i></p> <p><i>a. The location of the structure in relation to high-voltage transmission line.</i></p> <p><i>b. Any effects on the safe and efficient functioning of the transmission line.</i></p>	<p>Support in Part</p>	<p>Whilst TLC support in principle this rule, it is considered that some refinement is required so as to ensure clarity to plan users.</p> <p>In particular – TLC request Council to clarify the rule so as to include sub transmission lines which are also high voltage.</p> <p>As currently drafted, transmission lines could be taken to only include Transpower’s transmission lines, whereas TLC own and operate a number of regionally significant sub transmission lines (being high voltage 11-33kV).</p> <p>By clarifying that the provision relates to both transmission and sub transmission lines will ensure the rule is appropriately interpreted by plan users and administrators.</p>	<p>TLC seek that the following amendment is made to proposed rule 4b.1.7:</p> <p><i>Any building (except network utilities) located within 0 – 12 meters of a high voltage transmission <u>or sub transmission line is a restricted discretionary activity.</u></i></p> <p><i>When considering activities under Rule 4b.1.7 Council restricts the exercise of its discretion to the following matters:</i></p> <p><i>a. The location of the structure in relation to high-voltage transmission line.</i></p> <p><i>b. Any effects on the safe and efficient functioning of the transmission line.</i></p> <p>Alternatively, TLC would accept an advice note (or similar) to the effect that the term “transmission” is inclusive of sub transmission lines that are not a part of the National Grid.</p>
<p>4b.3.7 High voltage transmission lines</p> <p><i>i. Any building (except network utilities) located within 0 – 12m of a high-voltage transmission line is a restricted discretionary activity.</i></p> <p><i>When considering activities under Rule 4b.1.7 Council restricts the exercise of its discretion</i></p>	<p>Support in Part</p>	<p>As with the reason provided for Rule 4b.1.7 above, TLC request Council to clarify the rule so as to include sub transmission lines which are also high voltage.</p>	<p>TLC seek that the following amendment is made to proposed rule 4b.3.7:</p> <p><i>i. Any building (except network utilities) located within 0 – 12m of a high-voltage transmission <u>or sub transmission line is a</u></i></p>

SPECIFIC PROVISION	POSITION	REASON FOR SUBMISSION	RELIEF SOUGHT
			<p>restricted discretionary activity.</p> <p>When considering activities under Rule 4b.1.7 Council restricts the exercise of its discretion to the following matters:</p> <p>a. The location of the structure in relation to high-voltage transmission line.</p> <p>b. Any effects on the safe and efficient functioning of the transmission line</p>
<p>Rule 4b.4.15 Maximum Noise – Telecommunication and electricity equipment</p>	<p>Neutral</p>	<p>This standard indicates a noise compliance with Rule 4a.4.12; however Standard 4b.4.13 Maximum Noise – Limits would seem the appropriate standard to reference.</p>	
<p>4b.5.3</p>	<p>Support in Part</p>	<p>TLC are supportive of Council's control of their assets; however, sub-clause c) could be expanded upon so as to include consideration of the applicable network utilities development standards.</p> <p>Such standards as applicable to the electrical supply industry are The New Zealand Electrical Code of Practice for Electrical Safe</p>	<p>TLC seek that the following amendment is made to Proposed Rule 4b.5.3:</p> <p>c) <i>Whether the desired environmental outcome with a consistent and appropriate standard of infrastructure is achieved such as through compliance with the Council's and or Industry Development Guidelines</i></p>

SPECIFIC PROVISION	POSITION	REASON FOR SUBMISSION	RELIEF SOUGHT
			<p>Text to add shown as <u>underlined</u></p> <p>Text to delete shown as struckthrough</p>
<p>4b.5.5</p>	<p>are:</p> <p>...</p> <p>c) <i>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.</i></p> <p><i>Subdivision resulting in a new public road, or extension of existing public road</i></p> <p><i>The Council restricts the exercise of its discretion to the following matters:</i></p> <p>a. <i>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;</i></p> <p>b. <i>The impact of the resulting development on the ability of the roading networks to safely and sustainably operate and service the new development;</i></p> <p>c. <i>The effect that the development will have on the stormwater catchment.</i></p>	<p>Distances 2001 (NZECP 34).</p> <p>TLC wish to see that adequate provision for underground infrastructure is provided for in the design of new roads associated with subdivision.</p> <p>In consideration of standard 4b.5.5, TLC would like to see a reference in relation to services and separation in the discretionary matters.</p>	<p><i>and Structure Plans.</i></p> <p>TLC seek that provision 4b.5.5 includes roading design consideration for all underground infrastructure, as well as the associated separation requirements such as that specified in the <i>National Code of Practice for Utility Operators' Access to Transport Corridors</i></p>

Organisation:

Transpower New Zealand Limited

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environment.policy@transpower.co.nz

Daytime Phone: 03 590 7126

- 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
BM200966 Taupo DC Plan Changes 38-43 Transpower lodged submission 20221208

Submission by Transpower New Zealand Limited on Plan Changes 38-43 to Taupō District Plan

December 2022

Keeping the energy flowing



RMA FORM 5**SUBMISSION BY TRANSPOWER NEW ZEALAND LIMITED ON****Plan Changes 38-43 to Taupō District Plan****UNDER CLAUSE 6 OF THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991****To: District Plan Changes 38-43**

Taupō District Council
Private Bag 2005
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Name of Submitter:

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Trudi Burney – Senior Environmental Planner
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This is a submission to Plan Changes 38-43 to Taupō District Plan**Transpower could not gain advantage in trade competition through this submission****The specific provisions of the proposed plan changes that the submission relates to are:**

Refer attached submission which outlines the specific provisions, sought amendments, reasons and decisions sought.

Transpower NZ Ltd wishes to be heard in support of its submission.

Signature of submitter

[or person authorised to sign on behalf of the submitter.]

Date: 9 December 2022

Submission by Transpower New Zealand Limited on Plan Changes 38-43 to the Taupō District Plan

Introduction

Transpower New Zealand Limited (“Transpower”) welcomes the opportunity to make a submission on Plan Changes 38-43 to the Taupō District Plan (“Plan Changes”). The following provides an overview of Transpower’s role and function including;

- a description of Transpower’s assets in Taupō;
- an overview of the Resource Management Act 1991 (RMA) statutory framework as it relates to Transpower’s assets and functions; and
- specific comments on provisions of the Plan Changes.

Transpower has provided general feedback to Taupō District Council (“**Council**”) in the early drafting phase of the Plan Changes in late 2021, and high-level feedback on the draft Plan Changes in mid-2022. This feedback does not appear to have been incorporated into the Plan Changes. It is noted the feedback from mid 2022 was provided on the understanding a specific network utilities/infrastructure chapter would be provided as part of an overall review of the District Plan. It is now understood this is not the case.

Transpower has a number of concerns with the proposed structure and content of the proposed Plan Changes, the primary one being the inclusion of very limited National Grid provisions only in the General Rural and Rural Lifestyle Environments chapter, and therefore an inconsistent and inadequate approach to managing the effects of and on the National Grid in the District Plan. While operative provisions are included in the Industrial Environments zone chapter, these differ from those proposed under Proposed Plan Change 42. Transpower notes that because a rolling review of the district plan is being undertaken (noting that infrastructure is not scheduled to be addressed in any upcoming plan change) there will be a disjointed approach to managing effects of and on infrastructure, and particularly the National Grid, across the various zones. This can be remedied by prioritising the development of an energy and/or infrastructure chapter that specifically gives effect to the NPSET.

In its comments Transpower has identified a number of provisions which Transpower specifically opposes, as well as a suite of new provisions that are required to give effect to the NPSET. Transpower considers that further amendments to the proposed Plan Changes and District Plan are required in order to give effect to the NPSET and be consistent with the intent and effect of the NESETA, including policies specific to enabling the National Grid.

Section 75(3)(a) of the RMA requires that district plans must ‘give effect’ to a National Policy Statement, and the operative Regional Policy Statement. Case law has established that the words “give effect to” means to implement, which is a strong directive, creating a firm obligation on the part of those subject to it. Transpower reiterates its concern that neither the operative District Plan, nor the Proposed Plan Changes, give effect to the National Policy Statement on Electricity Transmission 2008.

Overview

The following comments are provided to inform the Plan Changes to ensure that the Taupō District Plan planning framework appropriately recognises and provides for the National Grid.

From Transpower's perspective, the provisions of the District Plan need to ensure:

- The National Policy Statement on Electricity Transmission 2008 ("NPSET" or "NPS") is given effect to;
- The sustainable management of the National Grid as a physical resource of national significance is recognised;
- The benefits of the National Grid at local, regional and national levels are recognised and provided for;
- The need for the operation, maintenance, upgrade and development of the electricity transmission network is recognised and provided for; and
- The protection of the National Grid from issues of reverse sensitivity and the adverse effects of others' activities is recognised to ensure the National Grid is not compromised.

Introduction to Transpower

Transpower is a State-Owned Enterprise that plans, builds, maintains and operates New Zealand's National Grid, the high voltage electricity transmission network for the country. The National Grid links electricity generators directly to major industrial users and distribution companies, feeding electricity to the local networks that distribute electricity to homes and businesses. The role of Transpower is shown in Figure 1 below. The National Grid comprises towers, poles, lines, cables substations, a telecommunications network and other ancillary equipment stretching and connecting the length and breadth of the country from Kaikohe in the North Island down to Tiwai in the South Island, with two national control centres (in Hamilton and Wellington).

The National Grid includes approximately 11,000 km of transmission lines and over 170 substations, supported by a telecommunications network of around 300 telecommunication sites, which help link together the components that make up the National Grid.

Transpower's role and function is determined by the State-Owned Enterprises Act 1986, the company's Statement of Corporate Intent, and the regulatory framework within which it operates. Transpower does not generate electricity, nor does it have any retail functions.

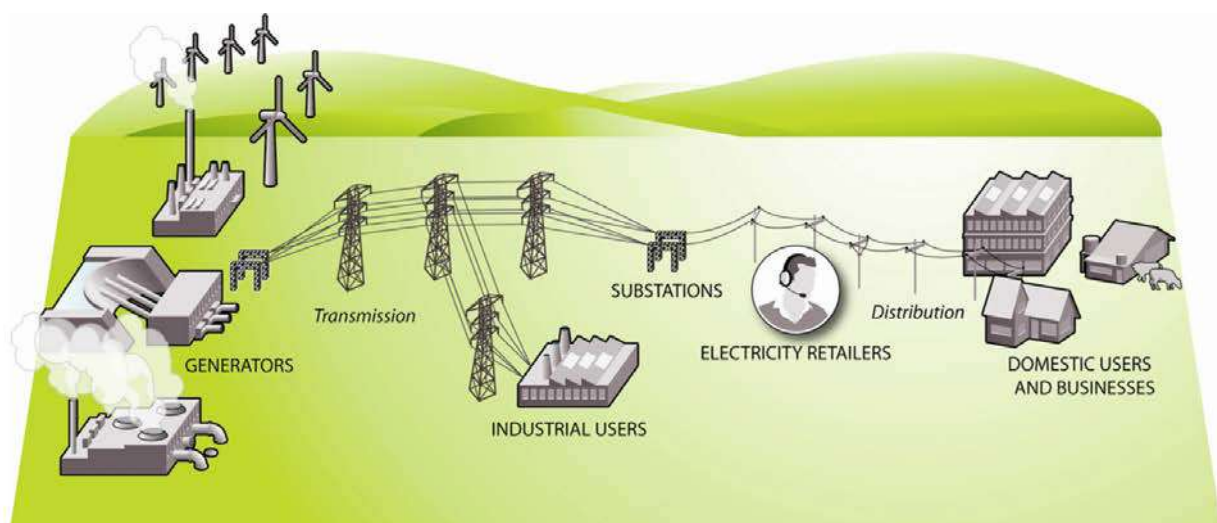


Figure 1. Role of Transpower in New Zealand's electricity industry. (Source: MBIE)

Transpower's role as outlined in its Statement of Corporate Intent for July 2022, states that:

Transpower is central to the New Zealand electricity industry, connecting New Zealanders to their power system through safe, smart solutions for today and tomorrow. Our principal commercial activities are:

- *As grid owner, to reliably and efficiently transport electricity from generators to distributors and large users, and*
- *As system operator, to operate a competitive electricity market and deliver a secure power system*

In line with the above, Transpower needs to efficiently maintain and develop the network to meet increasing demand, to connect new generation, and to seek security of supply, thereby contributing to New Zealand's economic and social aspirations. It must be emphasised that the National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs. As the economy electrifies in pursuit of the most cost efficient and renewable sources, the base case in Transpower's "Whakamana i Te Mauri Hiko" predicts that electricity demand is likely to increase around 55% by 2050. Whakamana i Te Mauri Hiko suggests that meeting this projected demand will require significant and frequent investment in New Zealand's electricity generation portfolio over the coming 30 years, including new sources of resilient and reliable grid connected renewable generation. In addition, new connections and capacity increases will be required across the transmission system to support demand growth driven by the electrification of transport and process heat. Simply put, New Zealand's electricity transmission system is the infrastructure on which our zero-carbon future will be built. This work supports Transpower's view that there will be an enduring role for the National Grid in the future, and the need to build new National Grid lines and substations to connect new, renewable generation sources to the electricity network.

The National Grid has operational requirements and engineering constraints that dictate and constrain where it is located and the way it is operated, maintained, upgraded and developed. Operational requirements are set out in legislation, rules and regulations that govern the National Grid, including the Electricity Act 1992, the Electricity Industry Participation Code, the New Zealand Electricity Code of Practice for Electricity Safe Distances (NZECP 34:2001), and the Electricity (Hazards from Trees) Regulations 2003.

It is important to note that Transpower's role is distinct from electricity generation, distribution or retail. Transpower provides the required infrastructure to transport electricity from the point of generation to local lines distribution companies, which supply electricity to everyday users. These users may be a considerable distance from the point of generation.

Taupō District Assets

The following National Grid assets are within or traverse the Taupō district.

- ARA-WRK-A Aratiatia - Wairakei A Single Circuit Steel Tower 220kV line
- ATI-TRK-A Atiamuri - Tarukenga A Double Circuit Steel Tower 220kV line
- BHL-WHN-A Brownhill - Whakamaru North A Double Circuit Steel Tower 400kV line (noting this line is designated)
- BPE-WKM-A Bunnythorpe - Whakamaru A Single Circuit Steel Tower 220kV line
- BPE-WKM-B Bunnythorpe - Whakamaru B Single Circuit Steel Tower 220kV line

- BPE-WRK-A Bunnythorpe - Wairakei A Single Circuit Steel Tower 220kV line
- MTI-WKM-A Maraetai - Whakamaru A Single Circuit Steel Tower 220kV line
- MTI-WKM-B Maraetai - Whakamaru B Single Circuit Steel Tower 220kV line
- MTI-WPA-A Maraetai - Waipapa A Single Circuit Steel Tower 220kV line
- OHK-EDG-A Ohakuri - Edgumbe A Single Circuit Steel Tower 220kV line
- OKI-WRK-A Ohaaki - Wairakei A Double Circuit Steel Tower 220kV line
- OTA-WKM-A Otahuhu - Whakamaru A Single Circuit Steel Tower 220kV line
- OTA-WKM-B Otahuhu - Whakamaru B Single Circuit Steel Tower, 220kV line
- OTA-WKM-C Otahuhu - Whakamaru C Double Circuit Steel Tower 220kV line
- PPI-THI-A Poihipi - Te Mihi A Single Circuit Steel Tower 220kV line
- RPO-DEV-A Rangipo - Deviation A Double Circuit Steel Tower 220kV line
- THI-DEV-A Te Mihi - Deviation A Single Circuit Steel Tower 220kV line
- WRK-WHI-A Wairakei - Whirinaki A Double Circuit Steel Tower 220kV line
- WRK-WKM-A Wairakei - Whakamaru A Single Circuit Steel Tower 220kV line
- WRK-WKM-C Wairakei - Whakamaru C Double Circuit Steel Tower 220kV line

There are also 13 substations within the district and five communication sites. The substations include Aratiatia, Atiamuri, Maraetai, Nga Awa Purua, Ohakuri, Ohaaki, Poihipi, Rangipo, Tokaanu, Whakamaru, Wairakei, Whakamaru North and Te Mihi. The communication sites include Atiamuri Radio, Kaimanawa, Whakapapataranga, Wairango and Whakamaru Radio.

Refer to Appendix 1 for a map showing the location of these assets.

Statutory Framework

National Policy Statement on Electricity Transmission

The National Policy Statement on Electricity Transmission (“**NPSET**”) was gazetted on 13 March 2008. The NPSET confirms the national significance of the National Grid and establishes national policy direction to ensure decision-makers under the Resource Management Act (“**RMA**”) duly recognise the benefits of transmission, manage the effects of the National Grid and appropriately manage the adverse effects of activities and development close to the Grid. The NPSET only applies to the National Grid – the assets used or owned by Transpower – and not to electricity generation or distribution networks.

The NPSET sets a clear directive to councils on how to provide for National Grid resources (including future activities) when drafting all their plans. Thus, councils have to work through how to make appropriate provision for the National Grid in their district/city plans, in order to give effect to the NPSET.

The one objective of the NPSET is as follows:

To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- *Managing the adverse environmental effects of the network; and*
- *Managing the adverse effects of other activities on the network.*

The NPSET’s 14 policies provide for the recognition of the benefits of the National Grid, as well as the environmental effects of transmission and the management of adverse effects on

the National Grid. The policies have to be applied by both Transpower and decision-makers under the RMA, as relevant. The development of the National Grid is explicitly recognised in the NPSET.

Policy 1 of the NPSET provides that decision-makers must recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission. Explicit reference is made to the benefits of security of supply, efficient transfer of energy, development and use of new electricity generation, and enhanced supply.

Policies 2 to 9 provide RMA decision-makers direction for managing the environmental effects of transmission activities.

Recognition of the development of the National Grid is also required in Policy 2 of the NPSET, in that *“decision makers must recognise and provide for ... the development of the electricity transmission network”*. Policy 2 is as follows:

In achieving the purpose of the Act, decision-makers must recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network.

Policies 3 to 5 contain matters to which decision-makers must consider or have regard, including:

- the constraints imposed on avoiding, remedying or mitigating adverse effects by the technical and operational requirements of the network
- the role of the route, site and method selection process in avoiding, remedying or mitigating adverse effects for new or major upgrades of transmission infrastructure, and
- the enablement of the reasonable operational, maintenance and minor upgrade requirements of established electricity transmission assets.

Policies 6 to 8 relate to Transpower’s responsibilities under the NPSET, with Policy 6 promoting the reduction of existing adverse effects where substantial upgrades of transmission line infrastructure are undertaken. Policies 7 and 8 relate to circumstances in which the effects of transmission infrastructure could be reduced, minimised or avoided in urban and rural environments.

Policy 8 of the NPSET directs that within rural environments, planning and development of the National Grid should seek to avoid adverse effects on certain identified environments/areas (being outstanding natural landscapes, areas of high natural character, and areas of high recreation value and amenity, and existing sensitive activities). The wording of NPSET Policy 8 (*“should seek to avoid”*) does not impose an absolute requirement for the National Grid to avoid all adverse effects. Rather, the NPSET recognises total avoidance is not always possible given the technical and operational requirements of the National Grid (as recognised in Policy 3 of the NPSET).

Policy 8 is as follows:

In rural environments, planning and development of the transmission system should seek to avoid adverse effects on outstanding natural landscapes, areas of high natural character and areas of high recreation value and amenity and existing sensitive activities.

Policy 9 specifically relates to standards for dealing with electric and magnetic fields.

Policies 10 and 11 of the NPSET provide the primary direction on the management of adverse effects of subdivision, land use and development activities on the transmission network. These policies are critical matters for a District Plan to address. Policy 10 is as follows:

In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.

Policy 11 relates to the development of buffer corridors, and is as follows:

Local authorities must consult with the operator of the national grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent. To assist local authorities to identify these corridors, they may request the operator of the national grid to provide local authorities with its medium to long-term plans for the alteration or upgrading of each affected section of the national grid (so as to facilitate the long-term strategic planning of the grid).

Policy 12 requires the identification of the transmission network on territorial authority planning maps.

Policies 13 and 14 relate to the long-term strategic planning for transmission assets. Under Policy 14, regional councils must include objectives, policies and methods to facilitate long-term planning for investment in transmission infrastructure and its integration with land uses.

Section 75(3)(a) of the RMA requires that district plans must 'give effect' to a National Policy Statement. Case law has established that the words "give effect to" means to implement, which is a strong directive, creating a firm obligation on the part of those subject to it.

It is therefore a requirement that local policy reflects national direction and that the local policy is effective in helping support the integrated management of natural and physical resources across the region as a whole.

Resource Management (National Environmental Standard for Electricity Transmission Activities) Regulations 2009

The Resource Management (National Environmental Standard for Electricity Transmission Activities) Regulations 2009 ("NESETA") came into effect on 14 January 2010, providing a national framework of permissions and consent requirements for the operation, maintenance and upgrading of National Grid lines existing at 14 January 2010. It does not apply to substations or electricity distribution lines, and nor does it apply to the construction of new transmission lines (which are typically designated).

Activities covered by the NESETA are activities relating to the operation, maintenance, upgrading, relocation or removal of an existing transmission line, including:

- a construction activity
- use of land or occupation of the coastal marine area
- activities relating to an access track to an existing transmission line
- undergrounding an existing transmission line.

Under Section 44A of the RMA, local authorities are required to ensure there are no duplications or conflicts between the provisions of the NESETA and a proposed plan. The

NESETA regulates how Transpower's existing lines in the District are developed and maintained, rather than the District Plan rules. In accordance with Section 43B of the RMA, the District Plan rules cannot be more lenient or stringent than the NESETA rules and therefore the NESETA rules in effect prevail.

Specific National Grid Policy Framework

The primary basis and reasoning for the district plan provisions is to recognise the national significance of the National Grid and enable its operation, maintenance, upgrade and development. The sought policy framework is a result of Transpower's evolving approach to the management of activities near the National Grid as it works with Councils around the country on various plan review and plan change processes to give effect to the NPSET.

The need to operate, maintain, upgrade and develop the electricity transmission network is recognised as a matter of national significance through the NPSET. This significance applies universally across the country regardless of the nature of the specific National Grid asset. The NPSET Objective recognises that the network itself potentially gives rise to adverse effects, and that other activities can potentially adversely affect the network. The NPSET policies give direction on how to achieve the objective by providing for the recognition of the benefits of electricity transmission, as well as the management of the environmental effects of electricity transmission and the adverse effects of other activities on the transmission network. As such, the NPSET policies impose obligations on both decision-makers and Transpower itself.

There are three broad aspects to the NPSET which must be given effect to in district plans, as below.

Enabling the National Grid:

Policies and plans must provide for the effective operation, maintenance, upgrading and development of the National Grid. This includes recognising the national benefits. Policy 1 specifies that decision-makers must recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission. Explicit reference is made to the benefits of security of supply, efficient transfer of energy and facilitating the use and development of new electricity generation, including renewable generation in the management of the effects of climate change.

In terms of its existing assets, Transpower undertakes a wide range of maintenance activities across its entire asset base. Typical maintenance activities include earthworks, vegetation trimming and clearance, and support structure maintenance activities. Some but not all of these activities are regulated under the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009. Transpower considers it necessary for the District Plan to adopt an enabling framework through which the benefits of the National Grid can be considered and recognised.

Managing the effects of the National Grid:

Associated with the development of National Grid assets is the potential for adverse environmental effects. Policies 2 to 9 relate to management of the environmental effects of electricity transmission. In particular, Policy 2 states: *In achieving the purpose of the Act, decision-makers must recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network."*

Policies 3 to 5 contain matters which decision-makers must consider, including technical and operational constraints, the route, site and method selection process, and operational requirements.

Policy 6 of the NPSET seeks to reduce existing adverse effects where appropriate, while Policies 7 and 8 relate to effects on urban and rural environments respectively. Policy 9 specifically relates to health standards.

Policies 2 to 9 are particularly relevant to the Proposed District Plan as they provide the policy framework for managing the environmental effects of electricity transmission in recognising and providing for the ongoing operation and development of the National Grid.

The development of the National Grid must therefore be managed to ensure the potential for adverse effects is appropriately managed while recognising the significance of the National Grid and the constraints under which it operates. The NPSET requires the District Plan to include objectives and policies that:

- Allow for the consideration of the technical constraints and operational requirements under which the National Grid operates for example. the linear nature of the transmission lines.
- Have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the route, site and method selection.
- Ensure new planning and development seeks to avoid adverse effects on more sensitive areas.

This policy direction within the NPSET sets an appropriate rule framework for National Grid infrastructure.

Policies, plans and decision makers must take in to account the characteristics of the National Grid, its technical and operational constraints, and the route, site and method selection process when considering the adverse effects of new National Grid infrastructure on the environment.

Managing the effects on the National Grid:

In addition to the health and safety issues of activities locating within proximity of the National Grid, the National Grid can be affected by other activities that establish beneath or in close proximity to its lines and/or structures. Such activities can generate reverse sensitivity effects where landowners/ operators request a Council to impose constraints on existing infrastructure to manage effects such as noise, reduced visual amenity, radio and television interference, perceived Electric and Magnetic Field ('EMF') effects, or interference with business activities beneath the lines. The location of buildings and activities, particularly 'sensitive activities' such as schools and residential properties, beneath or in close proximity to lines and/or structures can also compromise Transpower's ability to maintain, upgrade and develop the National Grid. Additionally, the stability of National Grid lines can be affected by earthworks that destabilise support structures resulting in their need to be relocated.

Of particular relevance in terms of the effects of activities on the National Grid are NPSET Policies 10 and 11. These policies act as the primary guide to inform how adverse effects on the National Grid are managed. The policies seek to:

- Avoid sensitive activities near electricity transmission lines and infrastructure;

- Manage other activities to avoid reverse sensitivity effects on the Grid; and
- Manage activities to ensure the operation, maintenance, upgrading and development of the Grid is not compromised.

The most effective and efficient way of managing the potential for adverse effects on the National Grid is to adopt a corridor approach. This corridor approach is often referred to as the “National Grid Yard” and the “National Grid Subdivision Corridor”. Adopting the National Grid corridor approach is supported by NPSET Policy 10, that requires councils to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and ensure that the operation, maintenance, upgrading, and development of the electricity transmission network is not compromised and Policy 11, that requires councils to identify an appropriate buffer corridor, within which sensitive activities should generally not be provided for.

Transpower supports the inclusion of these corridors within the Proposed Plan.

Transpower’s Feedback on Plan Changes 38-43

Transpower has a number of concerns with the proposed structure and content of the proposed Plan Changes:

- The only provisions relating to electricity transmission infrastructure are proposed in the ‘General Rural and Rural Lifestyle Environments’ chapters. The National Grid infrastructure is located across various zones. Critically, Wairakei Substation is located on Industrial Environment land and a number of transmission lines connect to this substation, as well as passing through other industrial or other urban-zoned land across the district. Plan Change 42 proposes the inclusion of very limited National Grid provisions in the General Rural and Rural Lifestyle Environments chapter which differ from the operative provisions in the Industrial Environment zone chapter. Furthermore no earthworks or subdivision provisions are introduced within the Rural Environment zones. The result is an inconsistent and inadequate approach to managing the effects of and on the National Grid.
- As noted above, the proposed provisions in Proposed Plan Change 42 are significantly lacking and in no way give effect to the requirements of the NPSET. Transpower reminds the Council that it has a statutory obligation to ensure that its district plan gives effect to the NPSET. Transpower seeks the removal of the limited provisions that apply to the National Grid from the General Rural and Rural Lifestyle Environments chapter, and requests that Council drafts a new Energy and/or Infrastructure chapter that provides a National Grid framework, as described above.
- The National Planning Standards require that provisions relating to energy, infrastructure and transport are contained in chapters within an ‘Energy, Infrastructure and Transport’ section of a district plan. While Taupō District Plan is not required to fully comply with the National Planning Standards at this stage, it would be logical to apply the requirements of the standards now. This would also allow for the plan to fully give effect to the NPSET and other national policy statements relating to energy and infrastructure.

In its comments Transpower has identified a number of provisions which Transpower specifically opposes, as well as a suite of new provisions that are required to give effect to the NPSET. Transpower considers that further amendments to the proposed plan change and the

operative District Plan are required in order to give effect to the NPSET and be consistent with the intent and effect of the NESETA.

Transpower notes that because a rolling review the district plan is being undertaken, there will be a disjointed approach to managing effects of and on infrastructure, and particularly the National Grid, across the various zones. This can be remedied by prioritising the development of an energy and/or infrastructure chapter that specifically gives effect to the NPSET. Sought provisions are provided within this submission.

An overview of key points in Transpower's submission is as follows:

Proposed Plan Change 38 – Strategic Directions

- Transpower supports the Strategic Objectives but seeks the provision of a new Strategic Objective specific to the National Grid.
- Transpower seeks insertion of new definitions for National Grid, regionally significant infrastructure and nationally significant infrastructure into the plan.

Proposed Plan Change 42 – General Rural and Rural Lifestyle Environments

- The Proposed Plan Change does not give effect to the NPSET, and seeks a new framework to do this. Transpower has proposed objectives, policies and rules to manage effects of and on the National Grid.
- Transpower's preference is that a new energy or infrastructure chapter is developed so that these effects are managed across all zones. However, if that is not supported by the Council, Transpower seeks a new suite of provisions that specifically address the National Grid and give effect to the requirements of the NPSET. This includes new objectives and policies, and rules that manage activities within the National Grid Yard, National Grid Subdivision Corridor and National Grid Substation Buffer, as well as policies specific to enabling the National Grid.
- New definitions are required to support the proposed new provisions.

Transpower has not provided comments on Proposed Plan Changes 39-41 as these are not specifically relevant to the National Grid.

Specific Comments

In addition to the general commentary above (which for the avoidance of doubt, forms part of the Transpower submission in that it outlines additional reasoning for the specific relief sought in the following table), the following provides specific submissions points. In addition to the relief sought on specific proposed plan provisions, Transpower seeks consistent plan wide recognition and provisions specific to the National Grid to give effect to the NPSET.

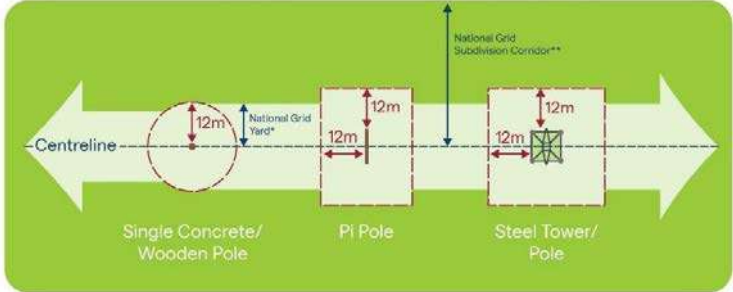
Amendments sought through this submission are shown as ~~red-strikethrough~~ and underline text. For the avoidance of doubt all the points below include any consequential amendments.

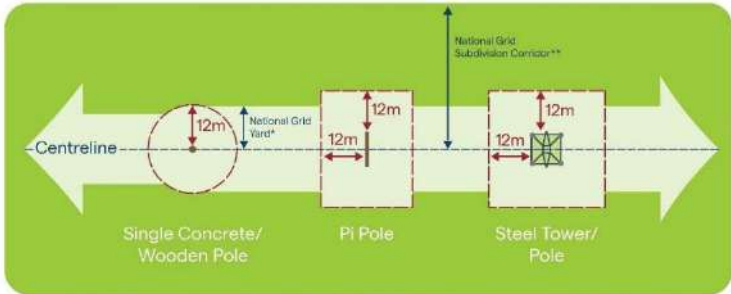
Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
Plan Change 38 – Strategic Directions			
New definition – NATIONAL GRID	New definition	<p>Transpower requests the inclusion of a definition for the National Grid, to support amendments requested by Transpower that incorporate this term into the strategic directions.</p> <p>The proposed definition refers to the NPSET and ensures that the definition remains consistent with the NPSET without requiring a plan change, if the NPSET is updated at any point during the life of the Plan. It also provides clarity to plan users that the definition reflects that in the NPSET.</p>	<p>Add the following definition:</p> <p>NATIONAL GRID has the same meaning as provided in the National Policy Statement on Electricity Transmission 2008.</p>
New definitions – REGIONALLY SIGNIFICANT INFRASTRUCTURE and NATIONALLY SIGNIFICANT INFRASTRUCTURE	New definitions	<p>These terms are used in the Strategic Directions chapter but are not defined in Plan Change 38 nor in the operative District Plan. The introductory text in 2.5 Strategic Direction 5 refers to various types of infrastructure but does not clearly delineate between regionally significant and nationally significant infrastructure, nor whether any</p>	<p>Add new definitions for ‘regionally significant infrastructure’ and for ‘nationally significant infrastructure’, and include the ‘National Grid’ within each of these definitions.</p>

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
		infrastructure is classified as neither of these. Definitions are required so that the intention and application of the strategic direction objectives are clear.	
<p>2.5 STRATEGIC DIRECTION 5 – SIGNIFICANT AND LOCAL INFRASTRUCTURE</p> <p>Introductory text</p>	Amend	The introductory text describes different types of infrastructure, but there are no clear definitions for ‘nationally significant’ and ‘regionally significant’ infrastructure. As per other submission points, Transpower requests that clear definitions for each of these terms are provided and that the introductory text is amended to accurately reflect these definitions.	<p>Add new definitions for ‘regionally significant infrastructure’ and for ‘nationally significant infrastructure’, and include ‘National Grid’ within each of these definitions.</p> <p>Amend the introductory text to accurately reflect each of the definitions.</p>
<p>New objective – 2.5.2 Objectives</p>	New objective	<p>Transpower requests the inclusion of a new objective that recognises the national significance of the National Grid.</p> <p>Transpower seeks provisions that are specific to the National Grid because unlike other regionally significant infrastructure, the National Grid has</p>	<p>Add a new objective in 2.5.2 Objectives as follows:</p> <p><u><i>5. The national significance of the National Grid and sustainable, secure and efficient electricity transmission is recognised and provided through and within the District.</i></u></p>

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
		<p>specific NPS policy recognition which district plans must give effect to.</p> <p>The proposed objective is required to give effect to the direction in the NPSET.</p>	
<p>2.5.3 Policy</p> <p>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, security of supply, and social, and economic wellbeing of people and communities and for their health and safety.</p>	Support	<p>Transpower supports the specific recognition of electricity transmission activities in addressing climate change, security of supply and wellbeing of communities, and notes that transmission and generation are interdependent and should be addressed together in this context.</p>	Retain this policy.
<p>2.5.3 Policy</p> <p>2. Recognise the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure.</p>	Amend	<p>‘Nationally and regionally significant infrastructure’ is not defined in the Plan. These terms need to be defined so that the application of the policy is clear.</p>	<p>Retain this policy.</p> <p>Provide a definition for ‘nationally significant infrastructure’ and ‘regionally significant infrastructure’, and include the National Grid in both definitions.</p>
<p>2.5.3 Policy</p> <p>3. Subdivision, land use and development will not adversely</p>	Amend	<p>Transpower requests minor amendments to this policy to clarify that activities should not</p>	<p>Amend 2.5.3 Policy as follows:</p> <p><i>3. Subdivision, land use and development will not adversely affect (including reverse sensitivity effects) or</i></p>

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
affect (including reverse sensitivity effects) the effective and safe functioning of infrastructure.		<p>compromise the operation of infrastructure. Infrastructure may be compromised in other ways beyond just reverse sensitivity effects, and the policy should reflect this.</p> <p>It is noted Proposed Plan Change 42 contains no subdivision or earthworks rules specific to the National Grid.</p>	<i>compromise the effective and safe functioning of infrastructure.</i>
Plan Change 42 – General Rural and Rural Lifestyle Environments			
Definitions			
General comment	Amend	<p>A number of the proposed new or amended definitions are inconsistent with the definitions provided in the National Planning Standards. Section 14.1 of the National Planning Standards states that:</p> <p>‘Where terms defined in the Definitions List are used in a policy statement or plan, and the term is used in the same context as the definition, local authorities must use the definition as defined in the Definitions List.’</p>	Amend definitions so that they are consistent with the National Planning Standards, including ‘Intensive indoor primary production’ and ‘rural industry’.

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
<p>New definition – NATIONAL GRID SUBDIVISION CORRIDOR</p>	<p>New definition</p>	<p>Transpower requests a new definition for the National Grid Subdivision Corridor, to give effect to the NPSET and to support the new rules requested by Transpower in submission points below.</p>	<p>Insert a new definition as follows:</p> <p><u>NATIONAL GRID SUBDIVISION CORRIDOR</u> means the area measured either side of the centreline of above ground National Grid transmission lines as follows (and illustrated in dark green below):</p> <ul style="list-style-type: none"> <u>37 metres for 220kV transmission lines on towers (including tubular steel towers where these replace steel lattice towers);</u> <u>39 metres for 350kV transmission lines on towers (including tubular steel towers where these replace steel lattice towers).</u>  <p>* National Grid Yard: 10m for single concrete/wooden pole lines, 12m for all other line types ** National Grid Subdivision Corridor: 14m, 32m, 37m or 39m depending on line voltage</p>
<p>New definition – NATIONAL GRID SUPPORT STRUCTURE</p>	<p>New definition</p>	<p>Transpower requests a new definition for National Grid Support Structure, to support the new rules and performance standards</p>	<p>Insert a new definition as follows:</p> <p><u>NATIONAL GRID SUPPORT STRUCTURE</u> means a pole or tower that is part of the National Grid.</p>

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
		requested by Transpower in submission points below.	
<p>New definition – NATIONAL GRID YARD</p>	<p>New definition</p>	<p>Transpower requests a new definition for the National Grid Yard, to give effect to the NPSET and specifically policies 10 and 11 which establish the mandate for the yard (corridor) approach applying to the electricity transmission network (being the assets used or owned by Transpower). The definition is also required to support the new rules requested by Transpower in submission points below.</p>	<p>Insert a new definition as follows:</p> <p><u>NATIONAL GRID YARD</u> means (as illustrated in light green below):</p> <ul style="list-style-type: none"> • <u>the area located 12 metres in any direction from the outer edge of a National Grid support structure;</u> • <u>the area located 12 metres either side of the centreline of any overhead National Grid transmission line on pi poles or towers (including tubular steel towers where these replace steel lattice towers).</u> <p><u>The national grid yard does not apply to underground cables or any transmission lines (or sections of line) that are designated.</u></p>  <p>* National Grid Yard: 10m for single concrete/wooden pole lines, 12m for all other line types ** National Grid Subdivision Corridor: 14m, 32m, 37m or 39m depending on line voltage</p>

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
New definition – SENSITIVE ACTIVITIES	New definition	Transpower requests a new definition for Sensitive Activities, to support the new rules requested by Transpower for activities in the National Grid Yard.	Insert a new definition as follows: <u><i>Sensitive Activities (in the National Grid Yard) means:</i></u> <u><i>a. residential activity;</i></u> <u><i>b. marae;</i></u> <u><i>c. hospital;</i></u> <u><i>d. healthcare activity;</i></u> <u><i>e. educational facility and preschools;</i></u> <u><i>f. retirement village;</i></u> <u><i>g. guest or visitor accommodation activity; or</i></u> <u><i>h. place of assembly.</i></u>
3b Rural Environment Chapter			
General comment	Oppose	Transpower seeks the introduction of a specific framework that manages effects of and on the National Grid, and gives effect to the NPSET. Transpower requests that new district-wide provisions are introduced, and provides suggested objectives, policies and rules in Appendix A to this submission. If Council chooses not to introduce the framework in Appendix A district-wide, Transpower seeks amendments to the Rural	Delete references to the National Grid from the Rural Environment chapter and introduce a new district-wide Infrastructure/Network Utilities chapter.

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
		Environment chapter as outlined in the submission points below.	
<p>General comment – introductory text</p> <p>...</p> <p>Other activities that are anticipated in the Rural Environment are tourism activities, visitor accommodation and renewable electricity generation and transmission. It is important that all such activities do not affect the ability of the rural environment to function effectively. It is also important to acknowledge that existing, lawfully established activities in the Rural Environment are able to continue operating and that activities that choose to locate in close proximity to these activities are aware of the effects they can generate and that the Rural Environment is the best location for these activities.</p>	Amend	<p>Transpower requests amendments to the introductory text to reflect that electricity transmission activities should not be constrained by the function of the rural environment, and that the National Grid has functional or operational need to be in particular locations. While it is unlikely that the presence of National Grid infrastructure would create constraints on rural function, these amendments would ensure consistency with the direction of the NPSET.</p>	<p>Amend introduction as follows:</p> <p><i>Other activities that are anticipated in the Rural Environment are tourism activities, visitor accommodation and renewable electricity generation and transmission. It is important that all such activities do not affect the ability of the rural environment to function effectively, <u>recognising that some activities have specific locational or operational needs that must be accommodated</u>. It is also important to acknowledge that existing, lawfully established activities in the Rural Environment are able to continue operating and that activities that choose to locate in close proximity to these activities are aware of the effects they can generate and that the Rural Environment is the best location for these activities.</i></p>

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
...			
<p>Objective 3b.2.4 Other activities</p> <p>Māori cultural activities, tourism activities, visitor accommodation and renewable electricity generation and transmission activities are enabled in the General Rural Environment.</p>	Amend	<p>While Transpower supports the enabling direction in this objective, it seeks new objectives, policies and rules that are specific to the National Grid, and that give effect to the NPSET.</p>	<p>Amend Objective 3b.2.4 as follows:</p> <p><i>Māori cultural activities, tourism activities, visitor accommodation and renewable electricity generation and transmission activities are enabled in the General Rural Environment.</i></p> <p>Add the following new objectives to 3b.2:</p> <p><u><i>The national significance and benefits of the National Grid are recognised, and the National Grid is protected and provided for.</i></u></p> <p><u><i>The safety, efficiency, operation, maintenance, repair, upgrading, or development of the National Grid is not constrained or compromised by subdivision, use and development.</i></u></p>
<p>3b.2 Objectives and Policies – General Rural Environment</p> <p>New policy</p>	New policy	<p>If a district-wide chapter for energy and/or infrastructure is not proposed, Transpower requests that a policy specific to the National Grid is included in chapter 3b.2. This policy seeks to manage effects of activities on the National Grid to ensure its continued safe and efficient operation.</p>	<p>Insert a new policy as follows:</p> <p><u><i>Ensure that subdivision, use and development does not compromise the safe and efficient operation, maintenance, repair, upgrading, removal and development of the National Grid, including by mapping the National Grid and identifying buffer corridors within which:</i></u></p> <p><u><i>a. the establishment or expansion of sensitive activities and intensive, large scale land uses will be avoided;</i></u></p>

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
			<u><i>b. subdivision and other development is managed to ensure the National Grid is not compromised and reverse sensitivity effects are avoided.</i></u>
3b.2 Objectives and Policies – General Rural Environment New policy	New policy	If a district-wide chapter for energy and/or infrastructure is not proposed, Transpower requests that a policy specific to the National Grid is included in chapter 3b.2. This policy seeks the continued safe and efficient operation, maintenance, upgrading, and development of the National Grid	Insert a new policy as follows: <u><i>Recognise and provide to the effective operation, maintenance, upgrading, and development of the National Grid.</i></u>
4b.1.7 High voltage transmission lines i. Any building (except network utilities) located within 0-12 metres 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:	Oppose	Transpower seeks deletion of this rule and replacement with specific rules that address the requirements of the NPSET, as described in the submission points below. The wording of this rule does not accurately reflect the nuance of the NPSET, and provides an almost complete restriction on buildings within 12m of a transmission line. This rule does not capture structures or activities within the setback, or differentiate between different	Delete this rule and replacement with specific rules that address the requirements of the NPSET, as described in this submission.

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
<p>a. The location of the structure in relation to high-voltage transmission line.</p> <p>b. Any effects on the safe and efficient functioning of the transmission line.</p>		<p>buildings. Transpower also notes that the exception for network utilities is not appropriate, particularly where other network utility providers (that is, not Transpower) rely on this provision.</p> <p>For clarity and accuracy, Transpower requests that this rule is deleted and replaced with the proposed new rules in its submission below.</p>	
<p>4b.3.7 High voltage transmission lines</p> <p><u>i.</u> Any building (except network utilities) located within 0-12 metres of a high voltage transmission line is a restricted discretionary activity.</p> <p>When considering activities under Rule 4b.1.7 Council restricts the exercise of its discretion to the following matters:</p>	Oppose	<p>Transpower seeks deletion of this rule and replacement with specific rules that address the requirements of the NPSET, as described in the submission points below.</p> <p>The wording of this rule does not accurately reflect the nuance of the NPSET, and provides an almost complete restriction on buildings within 12m of a transmission line.</p> <p>This rule does not capture structures or activities within the setback, or differentiate between different buildings and activities. Transpower also notes that the exception for</p>	Delete this rule and replacement with specific rules that address the requirements of the NPSET, as described in this submission (specifically refer submission point below).

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
<p>a. The location of the structure in relation to high-voltage transmission line.</p> <p>b. Any effects on the safe and efficient functioning of the transmission line.</p> <p>The Council restricts the exercise of its discretion to the following matters:</p> <p>a. The effect of the activity on the rural character of the area, having regard to visual effects and lighting effects.</p> <p>b. The effect of the activity on surrounding land uses and how these effects can be managed onsite and/or mitigated.</p> <p>c. The hours of operation for the activity.</p> <p>d. The proposed signage associated with the activity.</p>		<p>network utilities is not appropriate, particularly where other network utility providers (that is, not Transpower) rely on this provision.</p> <p>There are two sets of matters of discretion listed beneath this activity, and it appears this is a drafting error.</p> <p>For clarity and accuracy, Transpower requests that these this rule is deleted and replaced with the proposed new rules in its submission below.</p>	
<p>4b.1 General Rules – General Rural Environment</p>	<p>New rules</p>	<p>Transpower requests new rules and performance standards to reflect the requirements of the NPSET,</p>	<p>Insert a new rule for buildings, structures and activities in the National Grid Yard for each rural zone as follows:</p>

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
<p>AND</p> <p>4b.3 General Rules – Rural Lifestyle Environment</p> <p>New rules – buildings, structures and activities in the National Grid Yard</p>		<p>particularly policies 10 and 11. These provisions seek to ensure that buildings, structures and activities within the National Grid Yard do not create reverse sensitivity effects on, or compromise the operation, maintenance, upgrade or development of, the electricity transmission network. The provisions requested in this submission would effectively address these matters in the General Rural Environment and Rural Lifestyle Environment zones and would achieve consistency with many other district plans across New Zealand.</p>	<p><u><i>4b.x.x Buildings, structures and activities in the National Grid Yard</i></u></p> <p><u><i>Any building, structure and activity in the National Grid Yard which complies with the performance standards in 4b.x.x is a permitted activity.</i></u></p> <p><u><i>A building, structure or activity which does not comply with these performance standards or is not otherwise provided for, is a non-complying activity.</i></u></p> <p><u><i>Notification:</i></u></p> <p><u><i>Transpower will be considered to be an affected party where consent is required under the National Grid specific rules. Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited in accordance with Clause 10(2) of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.</i></u></p> <p><u><i>Where an activity requires resource consent solely because it is within the National Grid Yard and/or Corridor, public notification of the application is precluded. However, limited notification will be given to Transpower unless the written approval from Transpower is provided at the time the application is lodged. Notification to other parties is not precluded if resource consent is required for any other matters in the District Plan.</i></u></p>

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
<p>4b.2 Performance Standards – General Rural Environment</p> <p>AND</p> <p>4b.4 Performance Standards – Rural Lifestyle Environment</p> <p>New performance standards – buildings, structures and activities in the National Grid Yard</p>	<p>New performance standards</p>	<p>Transpower requests new rules and performance standards to reflect the requirements of the NPSET, particularly policies 10 and 11. These provisions seek to ensure that buildings, structures and activities within the National Grid Yard do not create reverse sensitivity effects on, or compromise the operation, maintenance, upgrade or development of, the electricity transmission network. The provisions requested in this submission would effectively address these matters in the General Rural Environment and Rural Lifestyle Environment zones and would achieve consistency with many other district plans across New Zealand.</p>	<p>Insert new performance standards for buildings, structures and activities in the National Grid Yard for each rural zone as follows:</p> <ol style="list-style-type: none"> 1. <u><i>The activity, building or structure is not a sensitive activity.</i></u> 2. <u><i>The building or structure is not for the reticulation or storage of water in canals, dams or reservoirs for irrigation purposes undertaken by a network utility operator as defined in the RMA.</i></u> 3. <u><i>The building or structure meets the safe electrical clearance distances required by New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) under all transmission line operating conditions and is:</i></u> <ol style="list-style-type: none"> a. <u><i>a fence or artificial screen not exceeding 2.5 metres in height measured from ground level.</i></u> b. <u><i>an uninhabited farm or horticultural structure or building (but not intensive indoor primary production, commercial greenhouses, wintering barns, produce packing facilities, or milking/dairy sheds (excluding ancillary stockyards and platforms)).</i></u> c. <u><i>irrigation equipment used for agricultural or horticultural purposes including the reticulation and storage of water where it does not</i></u>

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
			<p><u>permanently physically obstruct existing vehicular access to a National Grid support structure.</u></p> <p>d. <u>undertaken by a network utility operator, infrastructure or any part of electricity infrastructure that connects to the National Grid.</u></p> <p>4. <u>The building or structure does not permanently physically impede existing vehicular access to any National Grid support structure.</u></p> <p>5. <u>The building or structure is not for the handling or storage of Class 1-4 hazardous substances (Hazardous Substances (Hazard Classification) Notice 2020) with explosive or flammable intrinsic properties (except this does not apply to the accessory use and storage of hazardous substances in domestic scale quantities).</u></p> <p>6. <u>The building or structure is located at least 12 metres from the outer visible edge of a foundation of a National Grid transmission line support structure, except where it:</u></p> <p>a. <u>is a fence or artificial screen not exceeding 2.5 metres in height that is located at least 5 metres from the outer visible edge of a foundation of a National Grid transmission line tower.</u></p> <p>b. <u>meets the requirements of clause 2.4.1 of New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001).</u></p>

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
			<p><i>c. <u>undertaken by a network utility operator, infrastructure or any part of electricity infrastructure that connects to the National Grid.</u></i></p>
<p>4b.1 General Rules – General Rural Environment</p> <p>AND</p> <p>4b.3 General Rules – Rural Lifestyle Environment</p> <p>New rules – earthworks or vertical holes in the National Grid Yard</p>	<p>New rules</p>	<p>Transpower requests new rules and performance standards to reflect the requirements of the NPSET, particularly policies 10 and 11. These policies seek to ensure that earthworks within the National Grid Yard do not create reverse sensitivity effects on the electricity transmission network. The rules and policies requested here would effectively address these matters in the General Rural Environment and Rural Lifestyle Environment zones and would achieve consistency with many other district plans across New Zealand.</p>	<p>Insert a new rule for earthworks or vertical holes in the National Grid Yard in each rural zone as follows:</p> <p><i><u>4b.x.x Earthworks or vertical holes in the National Grid Yard</u></i></p> <p><i>i. <u>Earthworks or vertical holes in the National Grid Yard which comply with the performance standards in 4b.x.x are a permitted activity.</u></i></p> <p><i>ii. <u>Earthworks or vertical holes which do not comply with performance standard 4b.x.x are a non-complying activity.</u></i></p> <p><i><u>The Council restricts its discretion to the following matters:</u></i></p> <p><i>a. <u>The extent to which the earthworks or vertical holes may compromise the safe access to, and operation, maintenance and repair, upgrading and development of the National Grid</u></i></p> <p><i>b. <u>The stability of land within and adjacent to the National Grid, and the structural intent of support structures, including the creation of an unstable batter.</u></i></p>

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
			<p><i>c. <u>The risk of electrical hazards affecting public or individual safety, and the risk of property damage.</u></i></p> <p><i>d. <u>Technical advice provided by Transpower.</u></i></p> <p><u>Notification:</u></p> <p><u>Application for resource consent under this rule will be decided without public notification. Transpower is likely to be the only affected person determined in accordance with section 95B of the Resource Management Act 1991.</u></p>
<p>4b.2 Performance Standards – General Rural Environment</p> <p>AND</p> <p>4b.4 Performance Standards – Rural Lifestyle Environment</p> <p>New performance standards – earthworks or vertical holes in the National Grid Yard</p>	<p>New performance standards</p>	<p>Transpower requests new rules and performance standards to reflect the requirements of the NPSET, particularly policies 10 and 11. These policies seek to ensure that earthworks within the National Grid Yard do not create reverse sensitivity effects on the electricity transmission network. The rules and policies requested here would effectively address these matters in the General Rural Environment and Rural Lifestyle Environment zones and would achieve consistency with many other district plans across New Zealand.</p>	<p>Insert new performance standards for earthworks or vertical holes in the National Grid Yard in each rural zone as follows:</p> <ol style="list-style-type: none"> <i>1. <u>Earthworks or vertical hole/s must not:</u></i> <ol style="list-style-type: none"> <i>a. <u>Exceed 300mm in depth within 6m of the outer visible edge of a National Grid support structure;</u></i> <i>b. <u>Exceed 3 m depth where located between 6m and 12 m of the outer edge of the visible foundation of any National Grid support structure;</u></i> <i>c. <u>Result in a reduction of the ground to conductor clearance distances as required in Table 4 of the New Zealand Electrical Code of Practice for Electrical Safe Distances 34:2001 ISSN 0114-0663;</u></i> <i>d. <u>Result in the permanent loss or obstruction of vehicular access to a National Grid support structure; and</u></i>

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
			<p><i><u>e. Compromise the stability of a National Grid support structure.</u></i></p> <p><i><u>The following earthworks or vertical holes activities are exempt from Rule 1.a and Rule 1.b above:</u></i></p> <ul style="list-style-type: none"> <i><u>a. earthworks or vertical holes/s, excluding mining and quarrying, that are undertaken by a network utility operator (other than for the reticulation and storage of water for irrigation purposes) as defined by the Resource Management Act 1991;</u></i> <i><u>b. earthworks or vertical hole/s, excluding mining and quarrying, as part of agricultural or domestic cultivation, or for the repair, sealing or resealing of a road, footpath, driveway or farm track;</u></i> <i><u>c. vertical holes not exceeding 500mm in diameter that are a post hole for a farm fence or horticulture structure more than 6m from the visible outer edge of a National Grid tower foundation;</u></i> <i><u>d. earthworks subject to a dispensation from Transpower under New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663.</u></i>
4b.5 Subdivision rules	New rule	Subdivision is considered the most effective point at which to ensure future reverse sensitivity effects and adverse effects of substations	Insert a new rule for subdivision in the National Grid Substation Buffer as follows:

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
<p>New subdivision rule – subdivision in the National Grid Substation Buffer</p>		<p>(including health and safety risks) are avoided. This can be achieved by designing subdivision layouts so that building platforms are located an appropriate distance from substations, and ensuring that appropriate access to the substation site is maintained.</p> <p>Transpower therefore seeks a new subdivision rule for subdivision of land within the National Grid Substation Buffer. Transpower seeks controlled activity status where building platforms are outside the buffer area, and non-complying activity status where platforms are able to be accommodated outside the buffer area. This reflects the potential reverse sensitivity effects and hazard risk from locating a platform within the buffer area.</p>	<p><u><i>4b.5.x Any subdivision of land in the National Grid Substation Buffer is a controlled activity provided the subdivision complies with the following requirements:</i></u></p> <ul style="list-style-type: none"> <u><i>i. All resulting allotments, except allotments for access or a public work, demonstrate that they are able to accommodate a building platform for the likely principal building(s) and any dwelling or sensitive activity located entirely outside of the National Grid Substation Buffer.</i></u> <u><i>ii. Vehicle access to National Grid assets is maintained.</i></u> <p><u><i>A subdivision that does not meet these requirements is a non-complying activity.</i></u></p> <p><u><i>The Council reserves its control over the following matters:</i></u></p> <ul style="list-style-type: none"> <u><i>1. The extent to which the proposed development design and layout enables appropriate separation distances between sensitive activities and the substation.</i></u> <u><i>2. The risk of electrical hazards affecting public or individual safety, and the risk of property damage.</i></u> <u><i>3. Measures proposed to avoid potential adverse effects, including reverse sensitivity effects, on the operation, maintenance, upgrading and development of the substation.</i></u>

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
			<p><u>4. Technical advice from an electrical engineer specialising in electricity transmission.</u></p> <p><u>5. The outcome of any consultation with Transpower.</u></p> <p><u>6. Whether the building, structure or sensitive activity could be located further from the substation.</u></p> <p><u>Notification:</u></p> <p><u>An application for resource consent under this rule will be decided without public notification.</u></p> <p><u>Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited in accordance with Clause 10(2) of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.</u></p>
<p>4b.5 Subdivision rules</p> <p>New subdivision rule – subdivision in the National Grid Subdivision Corridor</p>	New rule	Subdivision is considered the most effective point at which to ensure future reverse sensitivity effects, maintenance access issues, and adverse effects of transmission lines (including amenity issues) are avoided. This can be achieved by designing subdivision layouts to properly accommodate transmission corridors (including, for example, through the creation of reserves	<p>Insert a new rule for subdivision in the National Grid Subdivision Corridor as follows:</p> <p><u>4b.5.x Any subdivision of land in the National Grid Subdivision Corridor is a restricted discretionary activity provided the subdivision complies with the following requirements:</u></p> <p><i>i. <u>All resulting allotments, except allotments for access or a public work, demonstrate that they are able to accommodate a building platform for the likely principal building(s) and any dwelling or</u></i></p>

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
		<p>and/or open space where buffer corridors are located).</p> <p>Transpower therefore seeks a new subdivision rule for subdivision of land within the National Grid Subdivision Corridor. Given the national significance of the National Grid and potential for adverse effects, Transpower seeks restricted discretionary activity status to provide an appropriate incentive and opportunity to design subdivision layouts that avoid building sites within the National Grid Yard.</p>	<p><u><i>sensitive activity located entirely outside of the National Grid Yard.</i></u></p> <p><i>ii. Existing vehicle access to National Grid assets is maintained.</i></p> <p><u><i>For the purposes of Rule 4b.5.x the Council restricts the exercise of its discretion to the following matters:</i></u></p> <p><i>a. The risk of electrical hazards affecting public or individual safety, and the risk of property damage, including the extent to which the subdivision allows for earthworks, buildings and structures to comply with the safe distance requirements of the New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663.</i></p> <p><i>b. The provision for the on-going efficient operation, maintenance, development and upgrade of the National Grid, including the ability for continued reasonable access to existing transmission lines for maintenance, inspections and upgrading.</i></p> <p><i>c. The extent to which the subdivision design and consequential development will minimise the potential reverse sensitivity on and amenity and nuisance effects of the National Grid asset.</i></p> <p><i>d. The extent to which the design and construction of the subdivision allows for activities to be setback from the National Grid to ensure adverse effects</i></p>

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
			<p><u>on, and from, the National Grid and on public safety and property are appropriately avoided, remedied or mitigated, for example, through the location of roads and reserves under the transmission lines.</u></p> <p>e. <u>The ability to provide a complying building platform outside of the National Grid Yard.</u></p> <p>f. <u>The nature and location of any vegetation to be planted in the vicinity of National Grid transmission lines, and the how such landscaping will impact on the operation, maintenance, upgrade and development (including access) of the National Grid.</u></p> <p>g. <u>The outcome of any consultation with Transpower.</u></p> <p>h. <u>The risk to the structural integrity of the National Grid.</u></p> <p><u>Notification:</u></p> <p><u>Transpower will be considered to be an affected party where consent is required under the National Grid specific rules. Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited in accordance with Clause 10(2) of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.</u></p>

Specific Proposed Plan Provision	Support/ Oppose/ Amend	Submission reasoning	Relief sought
			<p><u>Where an activity requires resource consent solely because it is within the National Grid Yard and/or Subdivision Corridor, public notification of the application is precluded. However, limited notification will be given to Transpower unless the written approval from Transpower is provided at the time the application is lodged. Notification to other parties is not precluded if resource consent is required for any other matters in the District Plan.</u></p>

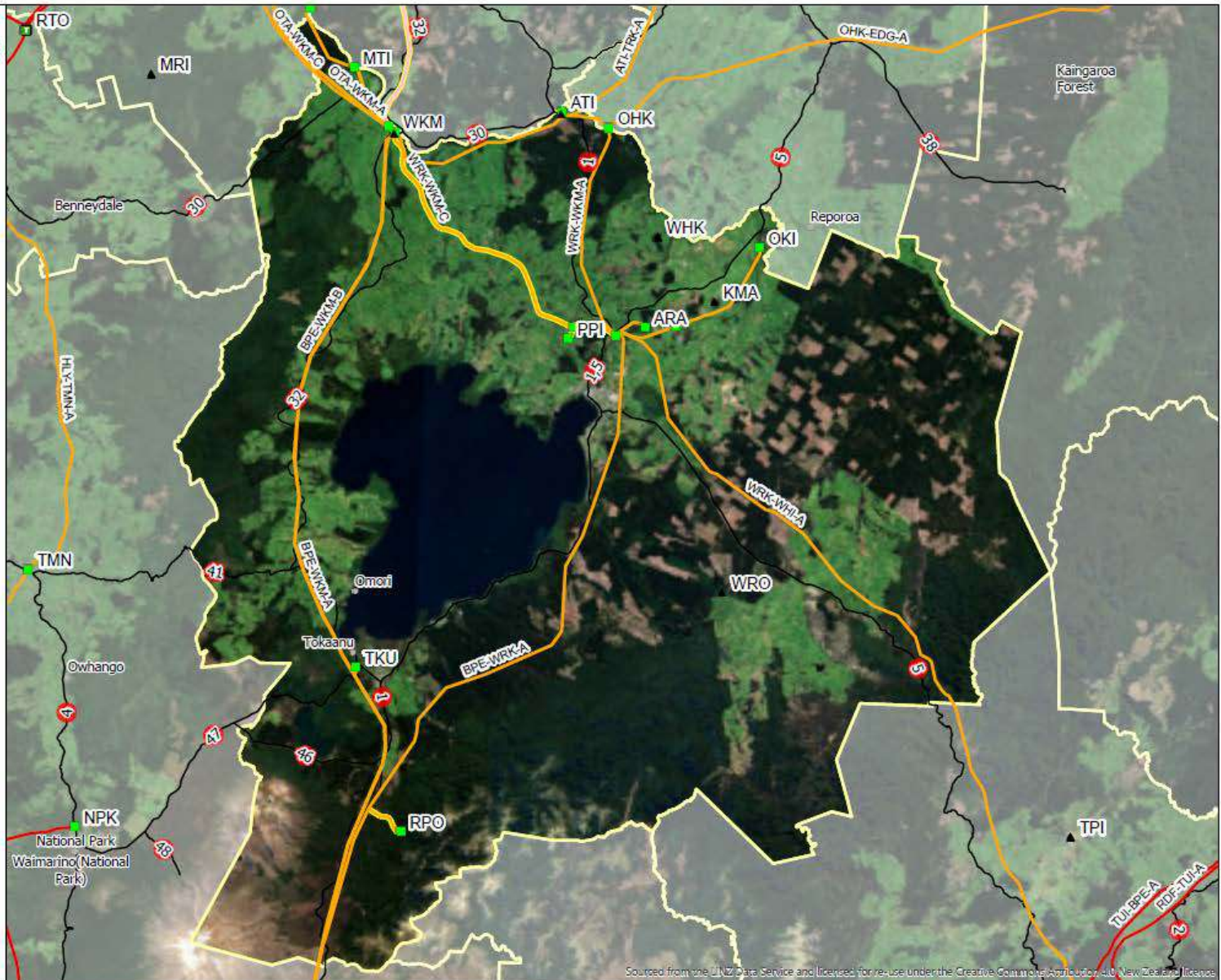
Appendix 1 National Grid Assets within Taupō district

Transpower Assets

Taupo District

Legend

- Territorial Land Authority
- Boundary
- NZ Roads
- Highways
- Transpower Assets**
- Cable Protection Zone
- Overhead Fibre Cable
- Underground Fibre Cables
- Site**
- ACSTN
- COMMS
- HVDC
- TEE
- Transmission Line**
- 0kV Overhead
- 11, 66kV Underground
- 11, 33, 66 kV Overhead
- 110kV Underground
- 110 kV Overhead
- 220kV Underground
- 220 kV Overhead
- 350 kV Overhead
- 350kV Submarine
- 400kV Overhead



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Date: 8/04/2020 Drawn by: berrymannem

**Organisation:**

Chapman Tripp

First name: Annabelle**Last name:** Lee**On behalf of:**

Radio New Zealand Limited

Postal address:**Suburb:****City:****Country:** New Zealand**Email:** Annabelle.Lee@chapmantripp.com**Daytime Phone:** 03 353 0114

- 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, RNZ will consider presenting a joint case with them at a hearing.

Attached Documents

File

RNZ submission on PC38 and 42 to Taupo District Plan

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: Radio New Zealand Limited (RNZ)

- 1 This is a submission on Proposed Plan Changes 38 and 42 to the Taupō District Plan (the *Proposed Plan Changes*).
- 2 RNZ could not gain an advantage in trade competition through this submission.
- 3 The specific provisions of the proposal that RNZ's submission relates to are set out in **Schedule 1 and Schedule 2** to this submission.
- 4 RNZ welcomes the opportunity to submit on the Proposed Plan Changes. RNZ is generally supportive of the Proposed Plan Changes, subject to the amendments in **Schedule 1 and Schedule 2**.
- 5 RNZ does wish to be heard in support of the submission.
- 6 If others make a similar submission, RNZ will consider presenting a joint case with them at a hearing.

Background

- 7 RNZ is a Crown entity established under the Radio New Zealand Act 1995. RNZ operates FM radio transmission facilities at Tuhingamata, Whakaroa Road and Mountain Road (*RNZ's Facilities*). The facilities at Mountain Road are particularly relevant to RNZ's submission on the Proposed Plan Changes.
- 8 The radiocommunication activities from RNZ's Facilities are carried out by RNZ and other broadcasters, using equipment that is owned, maintained and operated by each broadcaster.
- 9 It is important that the continued operation of RNZ's national transmission network can occur unimpeded. RNZ's Facilities are an integral and important part of RNZ's national communication network, and it is appropriate that the Proposed Plan Change recognises this and provides for RNZ's activities.
- 10 RNZ's Facilities perform an important role in, among other things, providing news and information to the public and performing a civil defence role (radio is a key communication tool in the event of natural disasters and RNZ is designated as a Lifeline Utility under the Civil Defence Emergency Management Act 2002).
- 11 As a lifeline utility, it is critically important that RNZ is not unduly restricted from carrying out activities that are fundamental to the ongoing operation of its transmission activities.

RNZ's Facilities in the Taupō District

- 12 RNZ's Facilities at Tuhingmata include:
- 12.1 FM transmission equipment that is operated from a site owned by another operator.
- 13 RNZ's Facilities at Whakaroa Road include:
- 13.1 FM transmission equipment, a wooden antenna pole and concrete hut that houses transmission equipment.
- 14 RNZ's Facilities at Mountain Road include:
- 14.1 FM transmission equipment, a wooden antenna pole and concrete hut that houses transmission equipment.
- 15 These facilities broadcast multiple radio programmes (and carry out civil defence functions) to the Taupō region and surrounding areas.
- 16 The location of RNZ's Facilities at Mountain Road, which is the infrastructure most relevant to the Proposed Plan Changes, is shown in **Figure 1** below.



Figure 1: RNZ's radio transmission Facilities at Mountain Road, Taupō

RNZ's submission – general comments

- 17 The Proposed Plan Changes include creating a new "Rural Lifestyle Environment Zone". Land in close proximity to RNZ's Facilities at Mountain Road is proposed to be subject to such zoning, as shown in **Figure 2** below.



Figure 2: Proposed Rural Lifestyle Environment Zone (orange) in relation to RNZ's Facilities at Mountain Road (yellow)

- 18 RNZ considers it is important that the provisions of the Proposed Plan Change recognise:
- 18.1 The critical contribution that infrastructure and network utility operations (such as RNZ's Facilities) make to the District's social, economic and cultural wellbeing, as well as health and safety.
 - 18.2 That network utilities may face technical and operational constraints that limit the geographic locations in which they can operate.
 - 18.3 The need to avoid "reverse sensitivity" effects on network utilities, for the benefit of the community.
- Reverse sensitivity**
- 19 RNZ transmitters across the country are particularly susceptible to reverse sensitivity effects and it is critically important that these effects, which have the ability to significantly restrain RNZ's operations, are avoided.
- 20 Reverse sensitivity effects are the adverse effects that a new "sensitive" land use can have on existing activities, i.e. they are effects caused by new development. For example:
- 20.1 RNZ has had direct experience of people, who live near some of its sites, complaining about interference to their electronic devices after they have purchased land and built a house near a transmitter (television reception and, potentially, broadband, telephone signals, burglar alarms and intercom units can be adversely affected near a transmitter);
 - 20.2 Nearby residents might not be happy that, on the occasions it is used (during scheduled or extensive power outages), RNZ's portable back-up generator makes a certain amount of noise; and

- 20.3 Residents might not be happy about being able to see poles and/or antennae associated with radiocommunication activity from their houses.
- 21 RNZ has in the past had to relocate transmitter facilities as a result of increased complaints from new residents moving near its facilities. This is a last resort for RNZ and is extremely disruptive and costly.

Conclusion

- 22 It is important that the Proposed Plan Changes, and provisions relating to the proposed Rural Lifestyle Environment, provide for the avoidance of reverse sensitivity effects.

Signed for and on behalf of Radio New Zealand Limited by its solicitors and authorised agents Chapman Tripp



Ben Williams
Partner
9 December 2022

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SCHEDULE 1 – SPECIFIC SUBMISSIONS ON PROPOSED PLAN CHANGE 38 TO THE TAUPŌ DISTRICT PLAN ON BEHALF OF RADIO NEW ZEALAND LIMITED

Objective/Policy/Rule	Proposed Wording	Support/ Oppose	Comment and decision sought
<p>2.5 Strategic Direction 5 Significant and Local Infrastructure</p> <p>Introductory text</p>	<p>Infrastructure, as defined in the Resource Management Act generally encompasses physical services and facilities which enable society to function, such as the three waters network, transport, communications, energy generation, transmission and distribution networks, and any other network utilities undertaken by network utility operators.</p> <p>Infrastructure is critical to the social and economic wellbeing of people and communities, including providing for their health and safety, and has national, regional and local benefits. However, inappropriately located or designed land use activities can adversely affect the safe and effective functioning of significant and locally important infrastructure.</p> <p>The Taupō District plays an important role in the location and provision of nationally 'significant infrastructure'. Its central location and natural resources means that Taupō is home to:</p> <ul style="list-style-type: none"> • State highways (1, 5, 32, 41 and 47). 	<p>Support with amendment.</p>	<p>RNZ observe that the operative Taupō District Plan does not define "<i>nationally significant infrastructure</i>" nor "<i>regionally significant infrastructure</i>".</p> <p>RNZ suggests consideration be given to a definition that provides elevated recognition, protection and enabling provisions for those types of infrastructure that are significant to the community. RNZ suggest that such a definition could reflect "<i>regionally significant infrastructure</i>" as contained in the Waikato Regional Policy Statement.</p> <p>As set out in the body of this submission it is important that RNZ's infrastructure in Taupō, as a lifeline utility that carries out a civil defence function, is recognised as regionally significant in the Strategic Directions.</p> <p>Therefore, RNZ seeks explicit recognition of its transmission facilities in the introductory text:</p> <p align="center">"...</p>

Objective/Policy/Rule	Proposed Wording	Support/ Oppose	Comment and decision sought
	<ul style="list-style-type: none"> • the national grid electricity transmission network • renewable electricity generation facilities that connect with the national grid, accounting for up to 20% of New Zealand’s total electricity demand • Airports used for regular air transport services by aeroplanes <p>The Taupō District is also home to Regionally Significant Infrastructure including municipal waste water systems, the telecommunications and electricity networks.</p> <p>In addition to nationally and regionally significant infrastructure, local roads and other infrastructure (including development and additional infrastructure) is vital for the ongoing functioning of the Districts urban and rural communities.</p>		<p><i>The Taupō District is also home to Regionally Significant Infrastructure including municipal waste water systems, the telecommunications and <u>radiocommunications networks</u> and electricity networks.</i></p> <p>...</p> <p>"</p>
2.5.2 Objectives	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	Support.	Subject to RNZ’s requested relief on the introductory text and suggested definition for “regionally significant infrastructure”, RNZ support this objective and seek that it is retained as notified.

Objective/Policy/Rule	Proposed Wording	Support/ Oppose	Comment and decision sought
	<p>recognised in decision making and land use planning.</p> <p>2. The local and national benefits of the sustainable development, operation, maintenance and upgrading of electricity transmission and renewable electricity generation resources and activities are recognised and encouraged.</p> <p>3. Land use in the District will not adversely affect the capacity and the safe and effective functioning of nationally and regionally significant and local infrastructure required to service existing and future communities.</p> <p>4. Local and national transport infrastructure located in the Taupō District operates in a safe and effective manner.</p>		
2.5.3 Policy	<p>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, security of supply, and social, and economic wellbeing of people and communities and for their health and safety.</p> <p>2. Recognise the functional and operational needs associated with the use and</p>	Support.	Subject to RNZ's requested relief on the introductory text and suggested definition for "regionally significant infrastructure", RNZ support this objective and seek that it is retained as notified.

Objective/Policy/Rule	Proposed Wording	Support/ Oppose	Comment and decision sought
	<p>development of nationally and regionally significant infrastructure.</p> <p>3. Subdivision, landuse and development will not adversely affect (including reverse sensitivity effects) the effective and safe functioning of infrastructure.</p> <p>4. Planning and development of infrastructure will consider the needs and the wellbeing of current and future communities.</p> <p>5. Recognise that infrastructure can have important environmental, economic, cultural and social effects.</p>		

SCHEDULE 2 – SPECIFIC SUBMISSIONS ON PROPOSED PLAN CHANGE 42 TO THE TAUPŌ DISTRICT PLAN ON BEHALF OF RADIO NEW ZEALAND LIMITED

Objective/Policy/Rule	Proposed Wording	Support/ Oppose	Comment and decision sought
Rural Environment Chapter			
3b.1 Introduction	It is also important to acknowledge that existing, lawfully established activities in the Rural Environment are able to continue operating and that activities that choose to locate in close proximity to these activities are aware of the effects they can generate and that the Rural Environment is the best location for these activities.	Support with amendment	RNZ supports the reference to ensuring lawfully established activities are able to continue operating, but would prefer stronger wording in relation to new activities, such as: <i>activities that choose to locate in close proximity to these activities are aware of the effects they can generate and that the Rural Environment is the best location for these activities, <u>and do not limit or restrain those activities.</u></i>
Objective 3b.2.5 Avoidance of reverse sensitivity	Reverse sensitivity effects on permitted and legally established activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided	Support.	RNZ support this objective. The radio transmission facilities at Mountain Road are a legally established activity within the General Rural Environment and it is appropriate that reverse sensitivity effects on this infrastructure are avoided. The reference to avoiding conflict with activities in neighbouring environments is particularly supported.

Objective/Policy/Rule	Proposed Wording	Support/ Oppose	Comment and decision sought
Objective 3b.2.6 Impacts on infrastructure	The impacts on infrastructure arising from subdivision and development are managed.	Support with amendment.	RNZ supports the recognition of the need to manage impacts from subdivision and development, but would prefer stronger direction such as 'avoided'.
Policy 3b.2.13 Avoiding reverse sensitivity	Any adverse effects generated by an activity must be managed within the allotment so as to avoid adversely affecting permitted and lawfully established neighbouring activities.	Support.	<p>RNZ strongly supports this policy. The radio transmission facilities at Mountain Road are a legally established activity within the General Rural Environment and it is appropriate that reverse sensitivity effects on this infrastructure are avoided. RNZ considers it would be useful to add specific reference to 'reverse sensitivity effects':</p> <p><i>Any adverse effects generated by an activity, including reverse sensitivity effects, must be managed within the allotment so as to avoid adversely affecting permitted and lawfully established neighbouring activities.</i></p>
4b.1.1 Activities in the General Rural Environment	<p>i. Any activity that:</p> <ul style="list-style-type: none"> a. Complies with all the Performance Standards for the General Rural Environment; and b. Complies with all the District Wide Performance Standards; and c. Is not identified as a controlled, restricted discretionary, discretionary or non-complying 	Support.	RNZ's activities will usually rely on and be assessed against the rules applying to network utilities. Still, RNZ supports permitted activity status for activities that comply with the Performance Standards for the General Rural Environment, in particular Building Height.

Objective/Policy/Rule	Proposed Wording	Support/ Oppose	Comment and decision sought
	<p>activity within the General Rural Environment; and</p> <p>d. Is not identified as a controlled, restricted discretionary, discretionary or non-complying activity with the District Wide Rules.</p> <p>is a permitted activity.</p> <p>ii. Any activity that is not a permitted, controlled, restricted discretionary or a non-complying activity is a discretionary activity.</p>		<p>Discretionary status is appropriate for activities that do not comply with the permitted activity requirements.</p>
4b.2.9 – 4b.2.13 Noise - Limits	Maximum noise limits	Support with amendment	<p>RNZ seeks an exemption from noise rules for the use of generators for emergency purposes by lifeline utilities. On the rare occasions the portable generator at RNZ's Facilities is used during scheduled or extensive power outages, it makes a certain amount of noise. As a lifeline utility it is critical RNZ can continue to use to ensure uninterrupted operations during emergencies. The following wording is suggested for an exemption:</p> <p><i><u>x. The use of generators and mobile equipment (including vehicles) for emergency purposes, including testing and maintenance not exceeding 48 hours in duration, where</u></i></p>

Objective/Policy/Rule	Proposed Wording	Support/ Oppose	Comment and decision sought
			<i>they are operated by emergency services or lifeline utilities;</i>
Rural Lifestyle Environment			
Objective 3b.3.2 Avoid reverse sensitivity	Adverse reverse sensitivity effects, including conflict with permitted and legally established activities in neighbouring Environments, are avoided.	Support.	RNZ support this policy. The radio transmission facilities at Mountain Road are a legally established activity within the General Rural Environment and it is appropriate that reverse sensitivity effects on this infrastructure are avoided. The reference to avoiding conflict with activities in neighbouring environments is particularly supported.
Objective 3b.3.6 Impacts on infrastructure	The impacts on community infrastructure arising from subdivision and development are managed.	Support with amendment.	RNZ supports the recognition of the need to manage impacts from subdivision and development, but would prefer stronger direction such as 'avoided' and that this policy direction applies to 'infrastructure' rather than being limited to community infrastructure.
4b.3.1 Activities in the Rural Lifestyle Environment	i. Any activity that: <ul style="list-style-type: none"> a. Complies with all the Performance Standards for the Rural Lifestyle Environment; and b. Complies with all the District Wide Performance Standards; and c. Is not identified as a controlled, restricted discretionary, discretionary 	Support.	RNZ support permitted activity status for activities that comply with the Performance Standards for the General Rural Environment, in particular Building Height. Discretionary status is appropriate for activities that do not comply with the permitted activity requirements.

Objective/Policy/Rule	Proposed Wording	Support/ Oppose	Comment and decision sought
	<p>or non-complying activity within the Rural Lifestyle Environment; and</p> <p>d. Is not identified as a controlled, restricted discretionary, discretionary or non-complying activity with the District Wide Rules.</p> <p>is a permitted activity.</p> <p>i. Any activity that is not a permitted, controlled, restricted discretionary or a non-complying activity is a discretionary activity.</p>		

**Organisation:**

Waka Kotahi NZ Transport Agency

First name: Luke**Last name:** Braithwaite**On behalf of:**

Waka Kotahi NZ Transport Agency

Postal address: PO Box 13055, Tauranga Central**Suburb:****City:** Tauranga**Country:** New Zealand**Postcode:** 3141**Email:** luke.braithwaite@nzta.govt.nz**Daytime Phone:** 04 978 2643

- 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, Waka Kotahi will consider presenting a joint case with them at a hearing.

Attached Documents

File
Attachment 2 Assessment of Plan Provisions to Provide for Human Health and Amenity in accordance with section 32 of the Resource Management Act
Waka Kotahi NZ Transport Agency Submission

Assessment of Plan Provisions to Provide for Human Health and Amenity in accordance with section 32 of the Resource Management Act



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Executive Summary

Waka Kotahi seeks a gradual reduction in health and amenity effects implemented as new activities are established or existing activities are altered in close proximity to the operational state highway network. This outcome aligns with *Toitū Te Taiao – Our Sustainability Action Plan*¹ which in turn implements the Government Policy Statement on Land Transport 2018/2019-2027/2028² and the enduring Transport Outcomes: *A framework for shaping our transport system: Enabling New Zealanders to flourish Transport outcomes and mode neutrality*, Ministry of Transport, June 2018.

Achieving these outcomes this will assist regulatory authorities achieving Part 2 of the RMA by providing for the use of natural and physical resources in a way which enables people and communities to provide for their health and safety³ and the maintenance and enhancement of amenity⁴.

There are various regulatory methods (within and outside of the RMA) to achieve this outcome. A district plan based method has been assessed as the most implementable method in the current environment. This assessment considers a range of district plan methods as required under section 32 of the RMA.

The assessment concludes that an integrated suite of district plan provisions is the most effective and efficient method to provide reasonable levels of amenity and health protection for sensitive activities. The recommended provisions are based on a (modelled) noise contour line being established with activities 'inside' the contour being subject to specific requirements to provide improved health and amenity outcomes.

The recommended provisions relate to new or altered (increased) sensitive activities located within the modelled noise contour and the usual operation of the transport network, they do not:

- a. apply retrospectively to existing buildings or sensitive activities;
- b. require land owner to address effects resulting from transport network defects (eg potholes), which are the responsibility of the road controlling authority; or
- c. manage amenity effects from transport noise from new or altered roads where these fall within the ambit of NZS 6806:2010 (Acoustics – Road traffic noise – New and altered roads).

¹ <https://www.nzta.govt.nz/assets/About-us/docs/sustainability-action-plan-april-2020.pdf>

² See paragraphs 123-124 and Table 1 Action 25 – Environment.

³ Section 5(2), RMA.

⁴ Section 7(c), RMA.

1. Introduction

The report has been prepared by Waka Kotahi NZ Transport Agency in accordance with Section 32 of the Resource Management Act 1991 (RMA) to assess the inclusion of human health and amenity provisions within District Plans.

Managing health effects from road noise is a shared responsibility between the road controlling authority and adjacent land users. Territorial authorities also have an important role to play in ensuring that planning instruments appropriately acknowledge and address the issue. Waka Kotahi invests significantly in design, construction and ongoing maintenance to minimise the effects of road noise. It is appropriate that those establishing or modifying land uses adjacent to existing State highways also share responsibility for protecting the health of occupants.

Retrospective management of transport noise effects is generally more difficult and expensive to achieve once activities have established adjacent to transport corridors. Management options are also more limited once activities are in place. For example, some design responses (eg. locating outdoor living areas away from noise sources) are not easily implemented or are precluded, retrospective building improvements can be challenging to implement, costly and disruptive, and property constraints may also limit response options (eg. no land available for acoustic barriers or bunding).

This report evaluates opportunities to provide plan provisions in accordance with section 32 of the RMA (s32). Under the RMA, a section 32 evaluation must:

- a. Examine whether the proposed objectives are the most appropriate way to achieve the purpose of the RMA (s32(1)(a));
- b. Examine whether the proposed provisions are the most appropriate way to achieve the objectives by identifying other reasonably practicable options, assessing their efficiency and effectiveness and summarising the reasons for deciding on provisions (s32(1)(b));
- c. Relative to considering the efficiency and effectiveness of the provisions in achieving the objective, include an assessment of the benefits and costs of the effects anticipated from implementing the provisions (s32(2)); and
- d. Contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from implementing the proposal (s32(1)(c)).
- e. For plan changes, evaluate the proposal against both the objectives of the proposed plan change and the objectives of the existing plan (s32(3)).

Each of these matters is addressed by examining the key issues pertaining to the human health and amenity, and how a range of responses could operate in order to achieve the desired outcomes. This report is supplemented by an 'issue identification' statement (Section 2) which describes the human health effects at issue and assesses the cost of implementing mitigation.

In addition to RMA Part 2 outcomes (including of providing for communities health⁵), Waka Kotahi seeks a gradual reduction in exposure as existing activities are altered or relocated. This outcome aligns with *Toitū Te Taiao – Our Sustainability Action Plan*⁶ which in turn implements the Government Policy Statement on Land Transport 2018/2019-2027/2028⁷ and the enduring Transport Outcomes: *A framework for shaping our transport system: Enabling New Zealanders to flourish Transport outcomes and mode neutrality*, Ministry of Transport, June 2018.

⁵ Resource Management Act, Part 2, Section 5(1).

⁶ <https://www.nzta.govt.nz/assets/About-us/docs/sustainability-action-plan-april-2020.pdf>

⁷ See paragraphs 123-124 and Table 1 Action 25 – Environment.

2. Issue identification

It is widely accepted nationally and internationally that noise from transport networks have the potential to cause adverse health and amenity effects on people living nearby. That potential has been documented by authoritative bodies such as the World Health Organisation (WHO)⁸ including the publication *Environmental noise guidelines for the European region* in October 2018 (WHO Europe Guidelines).⁹ The WHO Europe Guidelines are based on a critical review of academic literature and followed a rigorous protocol to assess the evidence of adverse effects.

With respect to sound from transport networks, the WHO Europe Guidelines note the potential for the following adverse effects:

- i. sleep disturbance;
- ii. high annoyance;
- iii. hypertension; and
- iv. ischaemic heart disease.

Based on the strength of the evidence of adverse effects, WHO recommends that policymakers reduce sound exposure from transport networks to below a range of guideline values.

State highways¹⁰ pass through both urban and rural areas and most have sufficient traffic volumes to generate sound above WHO Europe Guideline levels, indicating there will be impacts on human health and amenity where noise-sensitive activities locate nearby.

In New Zealand, Quality Planning's *Managing Land Transport Noise Under the RMA 2013 Guidance Note*¹¹ recognises that transport noise has potential health effects and identifies district plan responses (eg. managing sensitive activity location, setbacks, zoning (and re-zoning), and structural restrictions). The Guidance Note provides:

*One of the environmental results expected with the management of noise in plans should be the protection of people and communities from the impacts of land transport noise exposure*¹².

Within the Guidance Note, five alternative (non-RMA) responses¹³ are identified (urban design strategy, bylaws, NZ Standards, Building Code and Waka Kotahi guidance). Two of these (the Building Code and Waka Kotahi guidance) are addressed in this assessment.

⁸ World Health Organisation, Guidelines for community noise, 1999; World Health Organisation, Night noise guidelines for Europe, 2009; World Health Organisation, Burden of disease from environmental noise, 2011

⁹ World Health Organisation, Environmental noise guidelines for the European region, 2018.

¹⁰ May also apply to high traffic volume roads managed by other Road Controlling Authorities.

¹¹ <https://www.qualityplanning.org.nz/node/825>

¹² <https://www.qualityplanning.org.nz/node/825> 4. Environmental Effects Expected – Optional, page 12.

¹³ <https://www.qualityplanning.org.nz/node/825> Local Approaches – other mechanisms, page 14.

3. Objectives Assessment

Section 32(1)(a) of the RMA requires an examination of whether a proposed objective is the most appropriate way to achieve the purpose of the RMA. The purpose of the RMA is set out in Part 2, Section 5 of the Act.

5 Purpose

(1) The purpose of this Act is to promote the sustainable management of natural and physical resources.

(2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—

(a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and

(b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and

(c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.

Waka Kotahi has formulated proposed objectives and policies for inclusion in district plans. An assessment of the proposed objective against RMA section 5 is set out in Table 1, below.

Table 1: Assessment of Objective under Section 5	
Proposed Provision	Reason
<p>Objective 1 Protect sensitive activities from potential health and amenity effects that may arise from operational state highway noise.</p> <p>Policy 1 Locate and design new and altered buildings containing noise sensitive activities to minimise the potential for adverse effects from the designated state highway network.</p> <p>Policy 2 Manage subdivision which could contain noise sensitive activities through setbacks, physical barriers and design controls to ensure subsequent development can be located, designed and constructed to minimise exposure to noise.</p>	<p>Section 2 of this report describes likely adverse effects on sensitive activities where they are located in close proximity to the transport network.</p> <p>The objective (and supporting policies) will enable communities to provide for their social well-being and health by ensuring that noise sensitive activities located in close proximity to a state highway incorporate appropriate protection so as to ensure improved health outcomes and amenity levels.</p>

The balance of Part 2 of the RMA provides the framework for the sustainable management of natural and physical resources. Section 6 lists matters of national importance that shall be recognised and provided for, section 7 lists other matters that all persons exercising functions and powers under the RMA shall have particular regard to and section 8 addresses matters relating to the principles of the Treaty of Waitangi. No relevant matters in sections 6 or 8 have been identified. The proposed objective has been assessed against the following provisions of section 7 in Table 2.

Table 2: Assessment of Objective under Part 2 Section 7	
RMA Provision	Objective 1
s7(b) (the efficient use and development of natural and physical resources)	Objective 1 will provide for the efficient use and development of physical resources (land and the State highway network) by enabling the proximity effects of land use and infrastructure to be managed appropriately.
s7(c) (maintain and enhance amenity values)	Objective 1 will give effect to s7(c) by enhancing amenity by reducing effects of noise on noise-sensitive activities.

It is considered that the proposed objective is consistent with Part 2, section 5 of the Act and will result in the sustainable management of natural and physical resources.

4. Provisions Assessment

Sections 32(1)(b) and 32(2) require assessment of the proposed plan provisions to be undertaken. These are summarised as:

- a. whether the proposed provisions are the most appropriate way to achieve the objectives by identifying other reasonably practicable options, assessing their *efficiency and effectiveness* and summarising the reasons for deciding on provisions; and
- b. relative to considering the **efficiency and effectiveness** of the provisions in achieving the objective, include an assessment of the benefits and costs of the effects anticipated from implementing the provisions.

The cost and benefit assessment must identify and assess the costs and benefits associated with environmental, economic, social, and cultural effects including economic growth and employment that are anticipated to be provided or reduced. If practicable, these are to be quantified.

Section 32(2)(b) also requires an assessment of the risk of acting or not acting if there is uncertain or insufficient information. In this case, there is considered to be sufficient information about the subject to determine the range and nature of effects of the options set out, and so that assessment has not been undertaken.

4.1 Noise

4.1.1 Identifying options

Where the reasonably practical alternative options (assessed in Table 3) include plan provisions, they are framed in the following context:

- a. The provisions apply to all new and altered (by increase in floor area) *Noise Sensitive Activities* (defined in **Attachment 1**) which, in addition to residential activities, includes activities such as student or retirement accommodation, educational activity (including in any child care facility), healthcare activity and any congregations within places of worship/marae.
- b. Internal noise criteria of between 35 dB $L_{Aeq(24h/1h)}$ and 45 dB $L_{Aeq(24h/1h)}$ have been allocated to the *Noise Sensitive Activities* for the reasons described in **Attachment 2**. Specifications detailing how to achieve internal noise space can be either specified as a *Construction Schedule* included as part of **Attachment 1** or by a design certified by an acoustic consultant.
- c. Provisions include ventilation requirements where internal noise criteria are to be met; without ventilation the effectiveness of built acoustic treatment is compromised (ie. windows open for ventilation compromise the performance of building envelope noise mitigation measures). Ventilation requirements are specified in **Attachment 1**.
- d. Outdoor living space provisions apply only to areas specifically identified by the district plan as required outdoor living areas.
- e. Provisions include a mapped extent to which the provision would apply. This is described as Noise Control Boundary Overlay (NCBO) in accordance with the National Planning Standards Mapping Standard or identified as a 'yard'.

- f. The provisions:
- (i) do not apply retrospectively to existing sensitive activities;
 - (ii) are not proposed to require a land owner to address effects resulting from transport network defects (eg potholes), which are the responsibility of the road controlling authority; and
 - (iii) do not manage amenity effects from transport noise from a new or altered road; these generally fall within the ambit of NZS 6806:2010 (Acoustics – Road traffic noise – New and altered roads).

The reasonably practical alternative options identified include (a) to (d) above and are identified as:

- a. **Do nothing:** No plan provisions to protect sensitive activities from potential health and amenity effects.
- b. **Modelled setback:** Require specific response to manage noise based on a (modelled) noise contour line (NCBO) being established. Activities 'inside' the NCBO are a permitted activity (for the purposes of noise) if specific requirements are met. For the reasons set out in **Attachment 2**, the recommended extent of the NCBO is set at 57 dB $L_{Aeq(24h)}$. **Attachment 4** explains the basis of the acoustic model which takes into account environmental factors such as traffic volume, road surface, topography and buildings.
- c. **Metric setback:** Require specific response to manage noise where a sensitive activity is located within a specific NCBO based on distance (eg 40m, 80m or 100m) from a state highway. The specific setback distance may be based on speed limit (eg 40m for <70k/hr or 80m or 100m >70k/hr). Activities 'inside' the NCBO are a permitted activity if specific requirements are met.
- d. **Yard:** A 'no build' setback from state highways. All noise sensitive activities in the yard area are listed non-complying activities. Yard setback could be set based on road speed limit (eg 40m for <70k/hr or 80m or 100m >70k/hr).

An assessment of the *efficiency and effectiveness* of the options assessed in terms of Sections 32(1)(b) and 32(2) is included in Table 3.

Table 3: Alternative Option Assessment			
Option	Effectiveness and Efficiency	Costs	Benefits
Option A: Do Nothing	<p>Highly efficient but not effective.</p> <p>This option requires no action from the regulatory authority or applicants so is efficient.</p> <p>It is considered to be the least effective as it will allow an increase in adverse human health and amenity effects over time.</p>	<p>An increase in adverse health and amenity impacts (including costs). Poorer health and amenity outcomes fall on wider community and can be difficult to identify or resolve at an individual level.</p>	<p>No additional regulatory cost or costs to land owners in terms of compliance or building cost increases.</p>
Option B: Modelled Setback	<p>Highly efficient and effective.</p> <p>Utilising a model based on existing environmental conditions to calculate expected noise levels provides a more effective and efficient approach to setting the extent that a noise control should apply compared with Options C and D (both of which are 'standard width' controls regardless of local conditions).</p>	<p>A range of compliance and construction costs will apply when compared with Option A. These range from building and compliance design costs to meet permitted activity standards through to resource consent costs should standards not be complied with.</p> <p>The costs will fall on applicants and compliance confirmation costs will be borne by the regulatory authority and/or the applicant.</p> <p>Costs of mitigation have been independently assessed by Acoustic Engineering Services Limited¹⁴ and indicate typically a 0% to 2% increase in</p>	<p>Better human health outcomes as there will be less exposure to the causes of negative health and amenity outcomes when compared with Option A.</p> <p>Option B provides a comprehensive regulatory approach which recognises the spatial extent of road traffic noise based on environmental factors (eg traffic volume, topography, road surface, existing building locations). This will result in a more accurate reflection of the extent of likely effects than Options C or D.</p> <p>The provisions do not aim to achieve 'zero' health effects (which is the outcome sought by</p>

¹⁴ **Attachment 3:** Acoustic Engineering Services Limited, Report Reference AC20063 – 01 – R2: Cost of traffic noise mitigation measures, 12 June 2020.

Table 3: Alternative Option Assessment			
Option	Effectiveness and Efficiency	Costs	Benefits
		<p>construction cost for new dwellings and additions¹⁵ in new materials.</p> <p>Waka Kotahi will also bear the cost of maintaining up to date modelling data to support noise contour line establishment.</p>	<p>the WHO Guidelines). Rather, the Modelled Setback/Option B provisions provide for a balance between health and amenity protection, cost and regulatory administration.</p>
Option C: Metric Setback	<p>Moderately efficient and effective.</p> <p>Option provides a reasonable outcome but will 'capture' more sites than is necessary to be highly efficient.</p>	<p>Option C (especially where applied at 80m to 100m) is likely to affect a greater number of sites than Option B. It is a 'blanket' approach which does not reflect individual area conditions.</p> <p>Other costs are the same as for Option B.</p>	<p>Better human health outcomes as there will be reduced exposure to the causes of negative health and amenity outcomes when compared with Option A.</p> <p>Less costly to prepare (set distance rather than modelled) when compared with Option B.</p>
Option D: Yard provision	<p>Highly effective but not efficient.</p> <p>The 'no build' yard will provide a high level of health and amenity protection but does not result in an efficient use of land.</p>	<p>Limits construction on particular areas of a site; high cost borne by land owners as sensitive activity development is limited in these areas.</p>	<p>Good human health outcomes as there will be a reduced number of sensitive activities exposed to the causes of negative health and amenity outcomes.</p>

4.1.2 Assessing reasonably practicable options

Based on the cost benefit analysis presented in Table 3, Table 4 summarises reasonably practicable options.

Table 4: Identifying Reasonably Practicable Options	
Option	Is it reasonably practicable?
<i>Option A: Do nothing</i> This option is currently applied in some District Plans.	✓
<i>Option B: Modelled Setback</i>	✓

¹⁵ **Attachment 3:** Acoustic Engineering Services Limited, Report Reference AC20063 – 01 – R2: Cost of traffic noise mitigation measures, 12 June 2020.

Options similar to this are currently applied in some District Plans.	
<i>Option C: Metric Setback</i> Options similar to this are currently applied in some District Plans.	✓
<i>Option D: Yard requirement</i> Options similar to this are currently applied in some District Plans.	✓

4.1.3 Preferred option

Based on the analysis in Table 3 and the reasonably practicable options identified in Table 4, Table 5 rates each of the reasonably practicable options.

Table 5: Preferred Option			
Least Preferred			Most Preferred
Option A: Do Nothing.	Option D: Yard setback	Option C: Metric Setback	Option B: Modelled Setback

For the reasons set out in Tables 3 and 4, the Modelled Setback/Option B is considered to be the most efficient and effective method for addressing the health and amenity effects of transport noise.

However, as specific modelling is yet to be completed for the Taupo Region at this time Waka Kotahi are seeking a Metric Setback of 100m. Waka Kotahi anticipate that modelling can likely be completed at the time of further submissions and have allowed for scope in the submission to provide for an amendment to provide for a modelled rather than metric setback.

5. Conclusion

The Modelled Setback/Option B is identified as the preferred approach to manage the potential health and amenity effects of transport network operations, and to and provide a reasonable and appropriate balance between cost and benefit. The provisions apply only where an existing noise-sensitive activity is extended or a new noise-sensitive activity is proposed adjacent to a designated transport corridor.

The Modelled Setback/Option B have been detailed and compared against a number of alternatives in terms of their costs, benefits, and efficiency and effectiveness in accordance with the relevant clauses of section 32 of the RMA.

The Modelled Setback/Option B are considered to represent the most appropriate means of achieving the proposed objective and of addressing the underlying resource management issues relating to the transport environment, human health and amenity. However, until modelling is completed for the Taupo Region a 100m Metric Setback / Option C is sought which achieves outcomes similar to Modelled Setback/Option B however does not reflect individual area conditions.

New or altered State highway transport projects will continue to be assessed under NZS 6806:2010 (Acoustics – Road traffic noise – New and altered roads).

Attachment 1: Provisions (Option B)

Objective 1

Protect sensitive activities from potential adverse health and amenity effects that may arise from designated state highway noise.

Policy 1

Locate and design new and altered buildings containing noise sensitive activities to minimise the potential for adverse effects from the designated state highway network.

Policy 2

Manage subdivision which could contain noise sensitive activities through setbacks, physical barriers and design controls to ensure subsequent development can be located, designed and constructed to minimise exposure to noise.

New Definition

Noise Sensitive Activity(s): Means any residential activity including visitor, student or retirement accommodation, educational activity including in any child care facility, healthcare activity and any congregations within places of worship/marae. Excludes those rooms used solely for the purposes of an entrance, passageway, toilet, bathroom, laundry, garage or storeroom.

1. Permitted Activity Rule Indoor Noise

- a. Within the Noise Corridor Boundary Overlay, where:
 - (i) a new building that contains a noise sensitive activity; or
 - (ii) an alteration to an existing building resulting in an increase in floor area of a noise sensitive activity; or
 - (iii) a new noise sensitive activity is located in an existing building;

is proposed, it is to be:

- (iv) Designed, constructed and maintained to achieve indoor design noise levels not exceeding the maximum values in Table 1; and
- (v) If windows must be closed to achieve the design noise levels in (1)(a)(i), the building is designed, constructed and maintained with a mechanical ventilation system that:
 - a. For habitable rooms for a residential activity, achieves the following requirements:
 - i. Provides mechanical ventilation to satisfy clause G4 of the New Zealand Building Code; and
 - ii. 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
 - iii. provides relief for equivalent volumes of spill air; and
 - iv. provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18°C and 25°C; and
 - v. does not generate more than 35 dB $L_{Aeq(30s)}$ when measured 1 metre away from any grille or diffuser.
 - b. For other spaces, is as determined by a suitably qualified and experienced person.

- c. A report is submitted by a suitably qualified and experienced person to the council demonstrating compliance with clauses (1)(a)(i) and (ii) above (as relevant) prior to the construction or alteration of any building containing an activity sensitive to noise.

Table 1

Occupancy/activity	Maximum road noise level ^{Note 1} L _{Aeq} (24h)
<i>Building type: Residential</i>	
Sleeping spaces	40 dB
All other habitable rooms	40 dB
<i>Building type: Education</i>	
Lecture rooms/theatres, music studios, assembly halls	35 dB
Teaching areas, conference rooms, drama studios, sleeping areas	40 dB
Libraries	45 dB
<i>Building type: Health</i>	
Overnight medical care, wards	40 dB
Clinics, consulting rooms, theatres, nurses' stations	45 dB
<i>Building type: Cultural</i>	
Places of worship, marae	35 B

Note 1: The design road noise is to be based on measured or predicted external noise levels plus 3 dB.

2. Permitted Activity Rule Outdoor Living Area

- a. Where an outdoor living or outdoor activity space required by another rule in the Plan is within the Noise Corridor Boundary Overlay and the outdoor space is required for a noise sensitive activity, the required outdoor living space is to be designed and maintained to achieve noise levels not exceeding the maximum values in Table 2; and
- b. A report is submitted by a suitably qualified and experienced person to the council demonstrating compliance with clauses (2)(a) above prior to the construction or alteration of the any building to which the outdoor living space relates.

Table 2

Activity	Maximum road noise level ^{Note 1} L _{Aeq(24h)}
Required Outdoor Living Space	57 dB

Note 1: The design road noise is to be based on measured or predicted external noise levels plus 3 dB.

3. Restricted Discretionary Activity Rule

Any new or altered noise sensitive activity which does not comply with Permitted Activity (1) or (2).

Restricted Discretionary Activity – Matters of Discretion

Discretion is restricted to:

- (a) Location of the building and outdoor living space;
- (b) The effects of the non-compliance on the health and amenity of occupants; and
- (c) The outcome of any consultation with Waka Kotahi NZ Transport Agency.

Restricted Discretionary Activity – Assessment Criteria

Discretion is restricted to:

- (a) Whether the location of the building minimises effects;
- (b) Alternative mitigation which manages the effects of the non-compliance on the health and amenity of occupants; and
- (c) The outcome of any consultation with Waka Kotahi NZ Transport Agency.

Attachment 2: Technical Basis of Noise Criterion

In preparing the Modelled Setback/Option B, Waka Kotahi has assessed existing research, standards and guidelines to guide selection of appropriate noise criteria.

Two documents are identified as providing national and international guidance and directives for transport noise: the WHO Europe Guidelines and NZS 6806:2010 *Acoustics – Road-traffic noise – New and altered roads* (NZS 6806).

In addition, AS/NZS 2107:2016 *Acoustics – Recommended design sound levels and reverberation times for building interiors* (AS/NZS 2107) is a joint Australia and New Zealand standard which provides compliance measurement methods for background noise and recommends design criteria for occupied spaces.

WHO Europe Guideline

The WHO Europe Guidelines (the Guideline) contains key recommendations in regards to transport noise including:

Road¹⁶:

- For average noise exposure: recommends reducing noise levels produced by road traffic below 53 dB L_{den} ; and
- For night time exposure: recommends reducing noise levels produced by road traffic during night time below 45 dB L_{night} .

The WHO Europe document contains guidelines; it does not set a fixed standard. The Guideline has been prepared as an international research document and its outcomes need to be considered within the New Zealand statutory context before reference or inclusion in planning or policy documents. WHO guidance regarding effects of noise on health (more generally) are reflected in NZS 6806¹⁷.

NZS 6806:2010 Acoustics – Road-traffic noise – New and altered roads

NZS 6806 is the principal national document for management of noise in relation to new and altered roads. The purpose of NZS 6806 is to ensure noise effects on existing sensitive activities (described as Protected Premises and Facilities / PPFs) from new or altered roads are managed. It has been developed with the intention of being suitable to support RMA processes and to set reasonable noise criteria for road traffic noise (from new or altered roads) taking into account, among other things, health effects¹⁸.

NZS 6806 is a national standard, has been specifically developed for inclusion within an RMA framework, has been adopted into district plans and utilised in designations for the specific purpose of transport noise management. It is accepted as current good practice in regards to setting requirements which result in *reasonable* noise outcomes.

¹⁶ World Health Organisation, Environmental noise guidelines for the European region, 2018. Section 3.1.

¹⁷ NZS 6806 :2010 Section 4.7.1.

¹⁸ NZS 6806:2010 Acoustics – Road-traffic noise – New and altered roads, section 1.1.4.

NZS 6806 includes an external (“Category A”) noise criterion¹⁹ for altered roads (64 dB $L_{Aeq(24h)}$), and two criteria for new roads depending on design year traffic volumes (64 dB $L_{Aeq(24h)}$ for higher volume roads and 57 dB $L_{Aeq(24h)}$ for lower volume roads).

Higher volume roads are those which, at design year, are predicted to carry greater than 75,000 AADT (Average Annual Daily Traffic). Lower volume roads are those which, at design year, are predicted to carry between 2,000 and 75,000 AADT.

Internal noise criterion²⁰ for habitable spaces are set at 40 dB $L_{Aeq(24h)}$ for altered and new roads (regardless of AADT).

Analysis of 2018 AADT data²¹ shows the majority of existing state highways carry less than 75,000 AADT. It also indicates that only central parts of the Auckland motorway network currently have an AADT greater than 75,000.

While NZS 6806 applies to new and altered roads (ie. the onus is on the road controlling authority to manage effects), it provides strong guidance as to *reasonable* levels and expectations of noise levels in these environs. If these (<75,000 AADT) state highways were constructed (new) or altered in the current statutory environment, the lower level (57 dB $L_{Aeq(24h)}$) of the NZS 6806 external noise limits would be applied.

For road-traffic noise averaged over 24 hours, the internal 40 dB $L_{Aeq(24h)}$ criterion in residential habitable spaces from NZS 6806 represents a reasonable level as at night the level should reduce (as traffic volumes reduce) so as to avoid undue sleep disturbance.

AS/NZS 2107 Acoustics – Recommended design sound levels and reverberation times for building interiors

The scope of AS/NZS 2107 is to recommend criteria for healthy, comfortable and productive environments and it applies to steady-state or quasi-steady-state sounds. The Standard is ambiguous whether it should apply to transportation noise; regardless it provides an indication of reasonable internal levels for different types of sensitive activities. The criteria adopted in the Modelled Setback/Option B are generally consistent with AS/NZS 2107.

Conclusion

For the Modelled Setback/Option B, Waka Kotahi selected the NZS 6806 external level of 57 dB $L_{Aeq(24h)}$ and internal levels of between 35 dB $L_{Aeq(24h/1h)}$ and 45 dB $L_{Aeq(24h/1h)}$. This is because:

- a. the majority of state highway AADT fall within the lower AADT band for external noise within NZS 6806 (which requires external noise levels of 57 dB $L_{Aeq(24h)}$ for a new or altered road); and

¹⁹ NZS 6806:2010 Acoustics – Road-traffic noise – New and altered roads, Table 2 – Noise Criteria, A (primary free-field external noise criterion).

²⁰ NZS 6806:2010 Acoustics – Road-traffic noise – New and altered roads, Table 2 – Noise Criteria, C (internal noise criterion).

²¹ <https://www.nzta.govt.nz/resources/state-highway-traffic-volumes/> 2018 data - State highway volumes by region (in Excel format)

- b. the outdoor noise exposure level of 57 dB and an indoor noise threshold near the top of the design range²² in AS/NZS 2107:2016 (40 dB) have been selected as these levels are considered to provide a reasonable level of health and amenity protection but are not the most stringent.

²² *top of the design range* means that the noise limit is at the upper level of range - ie. allows more noise rather than less.

Attachment 3: Building Cost Assessment



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Memorandum

To: Greg Haldane, Waka Kotahi
From: Clare Dykes, Acoustic Engineering Services
File Reference: AC20063 - 01 - R2
Date: Friday, 12 June 2020
Project: Cost of traffic noise mitigation measures
Pages: 6

Meeting Telephone Memorandum File Note

Dear Greg,

In March 2020, Waka Kotahi NZ Transport Agency engaged Acoustic Engineering Services (AES) and O'Brien Quantity Surveying to undertake a study relating to the cost of traffic noise insulation measures. The project involved a review of a number of situations where traffic noise mitigation had been installed, including:

- Buildings which required upgrades to reduce traffic noise break-in as a result of their location in proximity to major roads, and;
- New residential neighbourhoods which were constructed near to major roads, where traffic noise barriers were integrated into the overall scheme design so that the upgrading of dwellings was no longer required (or was reduced) and noise in outdoor living areas was reduced.

This memorandum summarises the study, and the general trends visible in the results.

1.0 BUILDING UPGRADES

A common method of ensuring that noise from roads is not intrusive within buildings is to design the building envelope to provide a high level of sound insulation, and to provide a mechanical ventilation system so occupants do not need to open windows for cooling and fresh air.

The Christchurch District Plan contains a rule requiring the design of new noise sensitive buildings to be constructed in higher noise locations to include these sound insulation features. AES have previously completed a study related to the Christchurch District Plan sound insulation rule, which involved a review of the specific circumstances relating to a sample of building projects. The work described in this memo built on aspects of that previous study, and looked to quantify the cost of those building upgrades, to assist Waka Kotahi in understanding the potential financial implications of mandatory traffic noise insulation rules. A number of additional examples from various sources were added to the original sample, to increase the sample size and diversity.

We have also completed a review of the Proposed and Operative District Plans for the 67 New Zealand Districts. Two thirds of the District Plans throughout the country include requirements for sound insulation when dwellings are located in proximity to major roads. Of these, 10 % include a requirement which is very

similar to the Waka Kotahi Guidelines¹ centred around an internal noise level requirement of 40 dB L_{Aeq} (24 hour) in bedrooms and other habitable spaces, and the provision of mechanical ventilation. The remaining rules vary, with common variations including requiring different internal noise levels to be met, omitting any mechanical ventilation requirement (or a reduced mechanical ventilation requirement), and specifying a fixed level of sound insulation performance to be achieved by the building façade. As discussed below, all of these rule variations have a different cost impact.

1.1 The sample

A total of 58 buildings were considered for inclusion in the analysis. However, detailed costings were only completed on 23 of these, primarily because:

- A number of the building projects successfully obtained a Resource Consent to legitimise a partial or complete non-compliance with the relevant sound insulation rule, and so these results would not have assisted with understanding the cost of compliance.
- For a number of the building projects there was not sufficient publicly available information to complete an accurate costing.

The final 23 building projects included 11 detached residential dwellings, seven multi-residential units (such as terraced houses and duplexes), and five apartment buildings. These buildings were expected to experience worst-case traffic noise levels ranging from 55 dB L_{Aeq} (24 hours) to 71 dB L_{Aeq} (24 hours).

As discussed above, a variety of sound insulation rules are encountered throughout the country. The building projects in the sample had been assessed against the following rules:

- 12 of the sample has been assessed against a requirement which is similar to that described in the Waka Kotahi Guidelines, including an internal noise level requirement of 40 dB L_{Aeq} (24 hour) in bedrooms and other habitable spaces, and the provision of mechanical ventilation.
- Two of the sample were assessed using a rule which has a different internal noise level requirement with no mechanical ventilation required.
- Eight of the sample were assessed against rule with a façade reduction requirement or a provided set of constructions intended to provide a fixed façade reduction, and no mechanical ventilation required.
- One involved review against an internal noise level requirement of 40 dB L_{Aeq} (24 hours) for some spaces, and a façade reduction requirement for others.

Overall, the sample was relatively small – however a moderate number of examples could be assessed against a rule similar to that preferred by Waka Kotahi. Otherwise the variety within the sample is typical of the variety in sound insulation rules encountered in New Zealand.

Challenges of extending the sample included the lack of a centralised database to use for establishing a list of building projects of potential interest, and then the lack of availability of publicly available information for projects which provides sufficient detail for accurate costings.

1.2 Assumptions

Key assumptions embodied in this part of the study are as follows:

¹ Waka Kotahi NZ Transport Agency, *Guide to the management of effects on noise sensitive land use near to the state highway network*, Version 1.0, September 2015

- The reported external noise levels are based on the available traffic numbers, road surface, and speed information for the road adjacent to the building project site at the time, and are for the most exposed building façade.
- The upgrades that were recommended by the acoustic engineers involved in each case were installed and alternative systems were not used.
- The systems where not specified were originally 10 mm Standard Gib plasterboard internal linings for walls, and 13 mm Standard Gib plasterboard linings for ceilings, and 4 mm float glass / 12 mm air space / 4 mm float glass for glazing.
- Where 7 mm Ecoply RAB board was specified for external walls it was assumed that this would have been included regardless of the acoustic upgrades, and so was not included in the upgrade costing.
- Where not specified, the mechanical ventilation system was assumed to be of similar or equal design and performance to those projects where this detail was provided.

1.3 Findings

We have summarised a number of key observations from the analysis below.

Table 1.1 outlines the increase in overall building cost associated with any upgrades to the building façade and/or the installation of mechanical ventilation system, to ensure compliance with the various sound insulation rules.

Table 1.1 – Summary of cost of traffic noise mitigation by building type

Building Type	Range of external noise levels (dB L _{Aeq} (24 hours))	Increase in overall cost of building (per residential unit)	Percentage increase in overall cost of building
Detached residential	55 – 68	\$0 – \$16,000	0 – 2 %
Residential units	58 – 69	\$500 – \$15,000	0 – 2 %
Apartment buildings	60 – 71	\$500 – \$16,000	0 – 1 %

These results illustrate that the overall percentage increase in building cost due to compliance with a sound insulation rule was 2 % or less (noting that none of the buildings in the sample were exposed to external traffic noise levels exceeding 71 dB L_{Aeq}(24 hour)).

For the residential units and apartment buildings, the figures in table 1.1 are based on the total cost of upgrades, divided by the total number of residential units in the development. However, some units did not require any upgrades, as they experience lower external noise levels. If the total cost of upgrades is only divided by the number of units in the development which required upgrading, the percentage increase changes to 1 – 4 %.

In table 1.2 the results are presented based on the type of sound insulation rule that the assessment was undertaken against.

Table 1.2 – Summary of cost of traffic noise mitigation by rule type

Rule	Range of external noise levels (dB L _{Aeq} (24 hours))	Increase in overall cost of building per residential unit	Percentage increase in overall cost of building
Internal noise level of 40 dB L _{Aeq} (24 hours) and mechanical ventilation	55 - 71	\$0 - \$16,000	0 - 2 %
Alternative internal noise level requirement, no mechanical ventilation	64 - 65	\$500 - \$1,500	0 - 1 %
Façade reduction requirement or defined constructions, and no mechanical ventilation	55 - 69	\$0 - \$16,000	0 - 2 %

This summary appears to indicate that the costs associated with both the internal noise level and façade reduction rules are similar (noting that the sample size for the 'alternative internal noise level requirement, no mechanical ventilation' rule was very small, and the external levels were moderate). However, we note the following:

- For the methods which used internal noise levels, the increase in costs is very dependent on the external noise level. The developments which resulted in upgrade costs of less than 1 % typically experienced external noise levels below 65 dB L_{Aeq} (24 hours). There are exceptions to this depending on the layout of the units.
- While the 'façade reduction requirement or defined constructions' rules appear to attract a similar cost to the 'internal noise level' rules, those particular rules did not require mechanical ventilation to be installed. Occupants in some situations would therefore have still had to choose between thermal comfort, and noise. Additional cost should have been involved with installing mechanical ventilation in those situations, as was the case for the 'internal noise level of 40 dB L_{Aeq} (24 hours) and mechanical ventilation' examples. To put it another way, the cost may be similar, but the benefit is likely to have been less in many cases.
- The required construction upgrades (and therefore the costs) of the 'façade reduction requirement or a defined set constructions' rules are not dependent on external noise levels. This means that while the range of cost increases is similar, in some situations the high costs lead to no benefit, as the external noise levels were low. For the 'internal noise level of 40 dB L_{Aeq} (24 hours) and mechanical ventilation' examples where the costs were high, that was at least in response to high external noise levels and so was justified.

For a small number of developments, no upgrades were required as either external traffic noise levels were very low, or the original design included high mass cladding with small window areas on key facades.

2.0 BARRIERS

An alternative method for reducing the levels of road traffic noise experienced by the occupants of new dwellings is for a barrier to be installed to screen a new residential neighbourhood from the road. This means that individual dwellings are less likely to need to be upgraded, and noise levels in outdoor living areas are also reduced. However, the developer of the new neighbourhood is likely to primarily bear the cost of the barrier, compared to the building upgrades discussed in section 1.0 above, which are paid for by the individual building owners.

2.1 The sample

10 new residential neighbourhoods were included in the analysis. All of these adjoined State Highways and were likely to have been designed with some regard to the Waka Kotahi Guidelines. Each of the neighbourhoods had been screened from the State Highway with a traffic noise barrier, including:

- Seven examples with 'acoustic' fences ranging in height from 2 – 3 metres
- Two examples where earth bunds had been constructed – these were 2 – 3 metres in height, and 8 – 9 metres wide
- One example with a combination of acoustic fencing and earth bund

For each example, we determined the number of dwellings which would have experienced traffic noise levels of greater than 57 dB $L_{Aeq(24\text{ hours})}$ without a barrier. These dwellings would have been the most likely to have required upgrading had the barrier not been constructed, in order to satisfy a traffic noise insulation rule of the type discussed in section 1.0 above. We note that it is possible that some dwellings still required upgrading even with the barrier – for example the upper level of two-storey houses. As above, the barrier also reduces the noise levels in outdoor living areas associated with dwellings – which is a benefit compared to the sound insulation rules discussed in section 1.0, which only modifies the environment within a dwelling.

The number of dwellings which would have experienced traffic noise levels of greater than 57 dB $L_{Aeq(24\text{ hours})}$ without a barrier ranged from 1 through to 120. The number of affected lots was dependent on the overall layout of the subdivision relative to the road, as well as the traffic numbers, road surface, and speed.

2.2 Assumptions

Key assumptions were as follows:

- The acoustic fences were constructed of 125 x 75 mm H4 posts, 75 x 50 mm H3 railings, 150 x 25 mm H3 palings with 50 x 25 mm H3 battens over joins and 150 x 50 mm H3 capping.
- In some cases, the effective height of fences was increased, because they were constructed on top of a retaining wall. It was assumed that the retaining walls would have been required for general site levelling and not specifically to enhance the acoustic effectiveness of the barrier. This was therefore not included within the upgrade cost.
- It was assumed that the subdivision layout without the barrier would have been exactly the same. In reality larger setback distances or other rearrangement of the layout may have been included if the traffic noise had not been largely mitigated by the barrier.
- The earth bund was assumed to be constructed with surplus excavated soil from the site, with a layer of imported topsoil 150 mm thick spread on top for grass.

2.3 Findings

We have summarised a number of key observations from the analysis below.

Table 2.1 shows the cost of each barrier, divided by the number of dwellings which would have experienced a noise level of greater than 57 dB $L_{Aeq(24\text{ hours})}$ without a barrier. We have grouped the results together for different barrier types, and have also shown the situations where are large and small number of dwellings benefited from the barrier separately.

Table 2.1 - Summary of cost of traffic noise mitigation by barrier type

Barrier Type	Approximate number of dwellings which benefited from barrier	Cost of barrier per dwelling
Acoustic fence	1 - 10	\$15,000 - \$30,000
	30	\$10,000
	80 - 110	\$3,000 - \$5,000
Earth bund	10	\$60,000
	50	\$6,000
Combination	120	\$4,000

Overall, this analysis shows that when the number of affected dwellings is low (i.e. the layout results in few lots near the road, or the volume of traffic is low etc.) the overall cost per dwelling is high. When these absolute costs are viewed as a percentage of the likely final value of each of the affected sections, the range is from 2 % (acoustic fence, benefiting a large number of sections) to 30 % (earth bund, benefiting a few sections). As above, in all of these examples for dwellings constructed on these sections, additional costs in the order of those presented in tables 1.1 and 1.2 above would be largely avoided, and traffic noise levels in outdoor living areas would also be reduced.

We note that a key decision in the above analysis is whether the loss of the land under the footprint of any earth bund is included as a 'cost'. In all of the examples the bund fell within an area which was ultimately sold to a homeowner as part of a site, or was within an area close to the State Highway which was unlikely to have been developed for residential use regardless - so the loss of the land under the bund has not been included as a cost. As an example, for the development with approximately 50 affected dwellings, if the cost of the land under the bund was included in the analysis, the total cost as a percentage of the likely final value of each of the affected sections would increase from 3 % to 16 %.

We trust this is of assistance. If you have any queries, please do not hesitate to contact us.

Kind Regards



Clare Dykes
MBSc, MASNZ
Senior Acoustic Engineer
Acoustic Engineering Services Ltd

Attachment 4: Technical Basis of Model and Data Smoothing



Memo

To:	Stephen Chiles	Job No:	1014982
From:	John Carter	Date:	3 May 2021
cc:	Greg Haldane, Jovanna Leonardo		
Subject:	GIS advice on smoothing of noise contours around the state highway network		

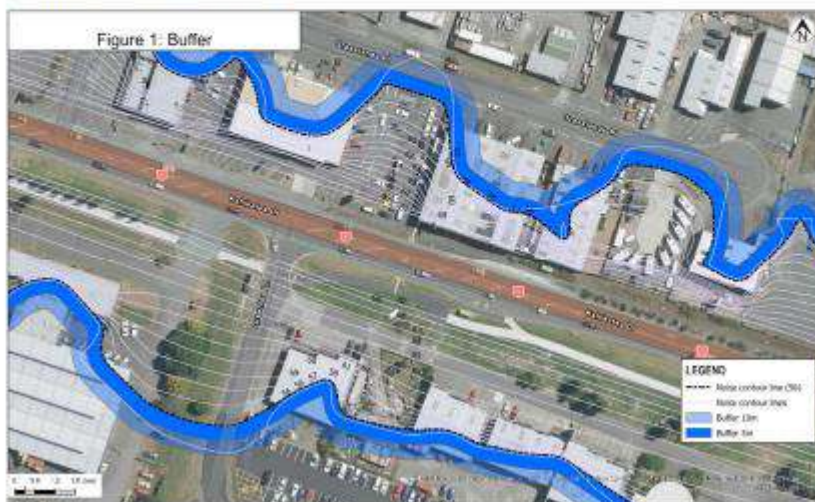
I am writing this memo to provide GIS advice on smoothing of noise contours around the state highway network, as you requested in our meeting on the 15th of April.

There are three main smoothing techniques that could be used to assist your work with Waka Kotahi, in refining rules for acoustic treatment of additions to existing houses or new houses being built near existing state highways. The three most relevant techniques are:

1. Buffer;
2. Simplify; and
3. Smooth.

Buffer

Buffering allows you to set the distance and the side of the line you want to create the buffer around. This is demonstrated in Figure 1 below. The buffer distance in metres can easily be modified based and depending on the distance used, the Figure shows how some of the smaller bends in the noise contour line (the dotted black line) are smoothed by the 5 metre (dark blue) and more so by the 10 metre (light blue) buffers.



Pros:

With buffering you will still keep the general shape of the line and have a consistent distance along the entire contour. This can be easily built into models and automated for the entire country.

Cons:

The negatives of this techniques are you still get some unwanted bends/curves, despite an overall more consistent line. The result of a buffer is an area (polygon), so there are two small steps to convert the polygon into a line, then erase the original line to give one new contour line. The other downside is you push the line out (i.e. needlessly increasing the extent of the contour) in a large proportion of areas where it is already smooth, unlike the smoothing and simplifying methods detailed later in this memo. This can be negated relatively simply by offsetting the line back by buffering the results by the same amount as the original buffer but back towards the original line.

Overall, this is a viable option for your needs, but the main issue would be deciding on the appropriate distance to buffer. Buffering could be used in conjunction with the other methods to provide both a smooth and conservative contour line from the raw modelling results.

As discussed in our meeting, this can be done in ArcGIS, FME and QGIS, but I would only recommend ArcGIS or FME for this task and to allow for integration with automation/existing models. More detail is available from ArcGIS provider ESRI: <https://pro.arcgis.com/en/pro-app/latest/tool-reference/analysis/buffer.htm>.

Simplify Line

Simplify Line simplifies a line by removing points along the line and therefore unwanted bends/curves, while preserving its shape (depending on the degree of simplification set known as *the tolerance*).

There are four available methods, when using ArcGIS Pro, the two most viable for this task are 'Wang-Muller' which retains critical bends and 'Zhou-Jones' which retains the weighted-effective areas. I have included the 'Wang-Muller' method on the 56 dB contour in Figure 2 below, with tolerance set at 10 metres and 50 metres.



The Zhou-Jones method needs lower tolerance set in general, as the results of the simplify tool can vary quite a lot from the original line.

Simplify Line with a Barrier

Simplify Line includes an option of having a barrier, which is another layer or feature can be used to prevent the main simplify line touching or crossing the barrier.

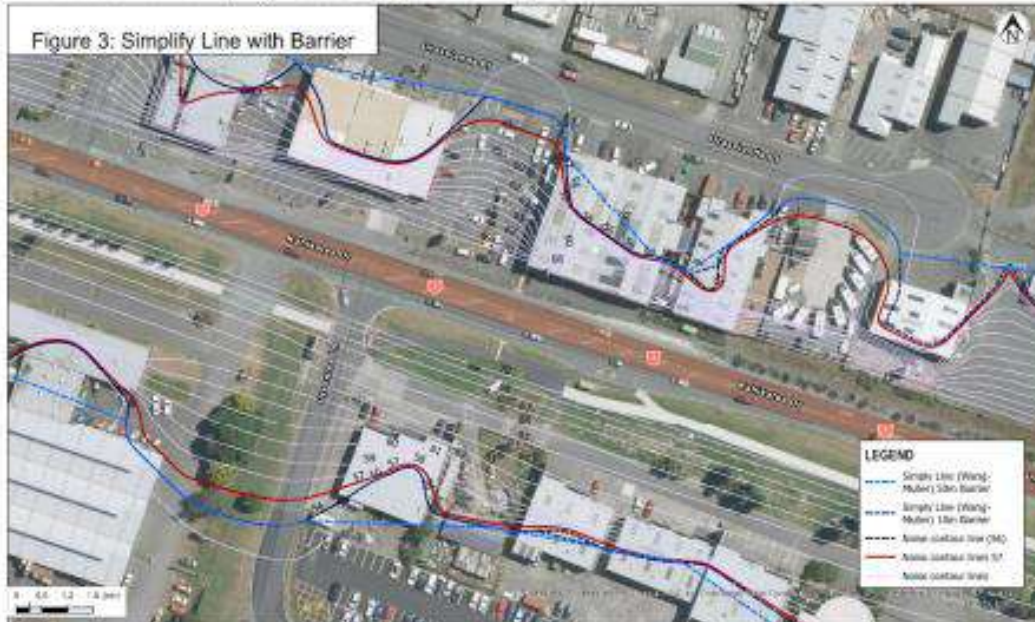


Figure 3 shows how this can be used. The Red line is the decibel (dB) 57 contour, it is included in the method as a barrier, to prevent the simplify line from the 56 dB contour line going across the 57 dB contour. The light Blue line has a tolerance of 50 metres and the dark blue line only has 10 metres tolerance. This should prove very useful when it comes to proving a planning line from noise contours.

Pros:

With simplifying you can set a tolerance to keep very true to the original contour line or really simplify it by setting a higher tolerance to cut out unwanted bends. The barrier should enable more sensible results by preventing modelled results of higher noise to be cut off by smoothing. You will keep the general shape of the line and where the line is already smooth or at least simply the line will match the modelled raw output. This can be easily built into models and automated for the entire country.

Cons

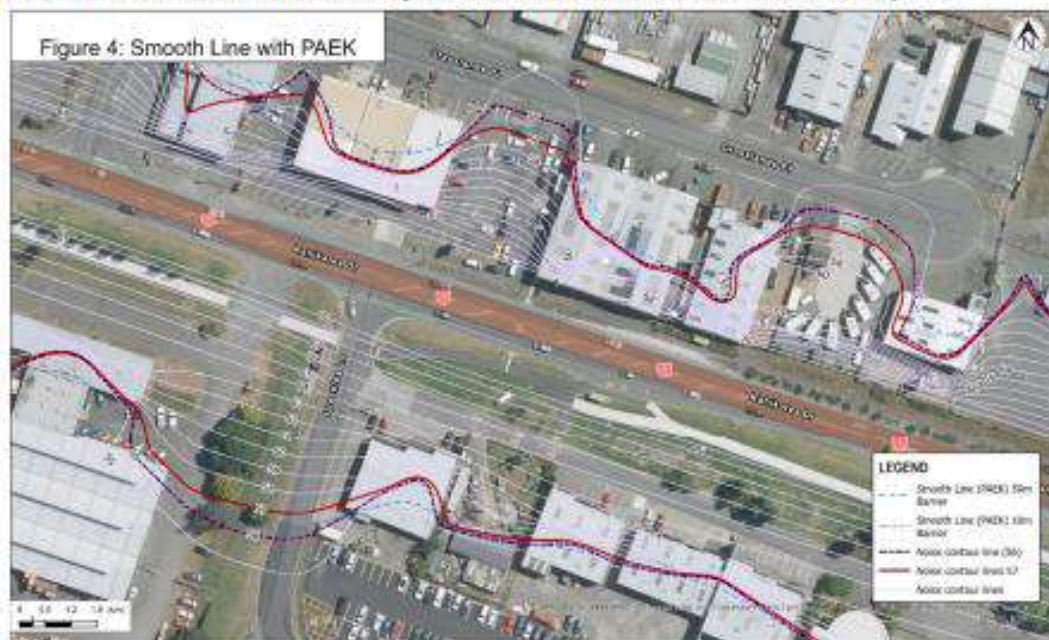
The negatives of this techniques are you still get some unwanted bends, but this can be overcome by adjusting tolerance to suit your wanted outcomes.

Overall, again this is a viable option for your needs, but the main issue would be deciding on the appropriate tolerance distance and barrier location.

More detail is available from ArcGIS provider ESRI: <https://pro.arcgis.com/en/pro-app/latest/tool-reference/cartography/simplify-line.htm>

Smooth Line

Smoothing lines removes the sharper angles with two main methods or algorithms. The Bezier interpolation method and the Polynomial Approximation with Exponential Kernel (PAEK) method. The Bezier method smooths the lines without using a tolerance, so it is not as viable for this task. The PAEK method, which like the simplify line tool allows you to set the tolerance, although the line may actually be more complicated, or have more points along it, which is something to think about for a national dataset. I have demonstrated the results of the PAEK method in Figure 4 below. The tolerance distance in metres can easily be modified based and barriers are also an option.



The Figure shows how the difference in the two tolerance values of 10 metres and 50 metres can vary greatly, where the 50 metre tolerance varies a lot from the original contour line.

Pros:

With smoothing you can keep use barriers and set tolerance. This can be easily built into models and automated for the entire country.

Cons

The negatives of this techniques are you may find it moves too much from the original contour. The valleys/peaks are removed, so you can get an overall more consistent line. The other downside is you again will have to set a tolerance that suits, and the line will move if that tolerance is pushed out or has higher values.

Overall, this could be a viable option for your needs, but the main issue would be deciding on the appropriate distance of tolerance.

As discussed in our meeting, this can be done in ArcGIS, FME and QGIS, but I would only recommend ArcGIS or FME for this task and to allow for integration with automation/existing models. More detail is available from ArcGIS provider ESRI: <https://pro.arcgis.com/en/pro-app/latest/tool-reference/cartography/smooth-line.htm>.

3-May-21

Attachment 5: Other Options Considered

For completeness, Waka Kotahi has also considered methods outside of the district plan to manage the issue; these include both regulatory (Building Code; National Environmental Standard) and private covenants (“no complaints” covenants) and built responses:

Regulatory

The **Building Act** (and Code) currently provides specifications to manage inter-tenancy noise (eg noise between residential apartments within the same building with shared tenancy walls). It does not, however, provide requirements for management of noise generated from outside a building (eg transport noise or nightclub noise from a separate building). A change to the Building Code would be needed to address the issue. While proposals for relevant changes to Clause G6 of the Building Code were circulated in 2016 and remain on MBIE’s work programme, these are not imminent.

A **National Environmental Standard** (NES) would require promulgation by central government, there is no current plan to promulgate RMA-based national planning direction in relation to health and amenity effects relative to transport.

There are situations where **covenants** are entered into where parties acknowledge and accept particular types of effects in return for locating in an area; commonly referred to as “no complaints” covenants. There are a number of limitations with this approach:

- a. it does not remove the actual effects on health and amenity therefore does not address the matters within Part 2 of the RMA;
- b. it is reliant on both parties coming to agreement;
- c. application of a covenant requires a ‘trigger’ to commence negotiations (eg. a request from a resource consent applicant to undertake works).

The primary limitation is however that it does not address actual health and amenity impacts.

Changes to the Building Act or promulgation of a NES are not directly within the control of Waka Kotahi; covenants require a ‘trigger’, agreement between parties and do not actually address the effects generated. None of these options are preferred.

Built Response

Waka Kotahi has undertaken a preliminary assessment of noise improvements across its network. It estimates a cost of at least \$150M²³ to retrospectively manage noise exposure for approximately 50% of persons exposed to noise above 64 dB $L_{Aeq(24h)}$.

Responses could include retrofitting acoustic barriers and/or installing low noise road surfaces.

Retrofitting noise barriers by motorways by Waka Kotahi has been found to cost in the range of \$4,000 to \$10,000 per linear metre of barrier. Construction of noise fences by individuals or land developers generally have lower costs.

Retrofitting acoustic barriers has a number of limitations:

- available land and/or ground conditions;

²³ Not currently funded.

- potential visual dominance and shading;
- ongoing maintenance costs (eg graffiti, landscape maintenance); and
- may not be effective for buildings of more than one storey.

There are also some benefits:

- for barriers close to buildings (or close to the road) and comprehensively blocking the line-of-sight of sensitive land uses to the state highway carriageway, a reduction of 5-10 dB can be achieved;
- where applied to large land areas, cost of protecting multiple sites will aggregate to be less than cost of protecting a low number of sites;
- reduces the need for individuals building houses to have to consider road noise or to keep windows closed;
- can provide visual screening giving a benefit in reducing both perception of noise and actual noise level; and
- can provide improved amenity for outdoor areas.

A porous asphalt surface (low noise road surface) would be in the order of \$30+/m² (standard two coat chipseal surface would be in the order of \$6/m² to \$10/m²). It cannot generally be laid directly on existing roads, because low noise (asphaltic) road surfaces require stiff underlying pavements, otherwise they fail prematurely. For much of the existing network, laying new asphaltic surfaces therefore first requires rebuilding of the structural pavement, which would increase the cost to over \$100/m². Low noise road surfaces can provide in the order of 5 dB reduction in noise generated from the tyre/road interface (although will not materially alter other sounds such as truck engine/air-braking noise). For traffic at highway speeds this is a meaningful improvement, although is often not sufficient to reduce sound to below guideline values.

Overall, while both built options provide some benefits, both options have significant costs and result in the full cost being borne by the road controlling authority in situations where the noise sensitive activity establishes after the state highway.

FORM 5

Waka Kotahi NZ Transport Agency submission on a notified proposal for the Taupō District Plan Changes 38, 42 & 43 under Clause 6 of Schedule 1 of the Resource Management Act 1991

9 December 2022

District Plan Changes 38-43

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 38, 42 & 43 to the extent the provisions have the potential to compromise Waka Kotahi NZ Transport Agency (Waka Kotahi) statutory obligations in terms of ensuring an integrated, safe, and sustainable transport system.

The Waka Kotahi submission is:

1. Waka Kotahi is a Crown entity that takes an integrated approach to transport planning, investment and delivery. The statutory objectives of Waka Kotahi are to undertake its functions in a way that contributes to an affordable, integrated, safe, responsive, and sustainable land transport system. Our vision is for a sustainable, multi-modal land transport system where public transport, active or shared modes are the first choice for most daily transport needs.
2. Waka Kotahi has a mandate under the Land Transport Management Act 2003 (LTMA), the Government Roothing Powers Act 1989 (GRPA), and the Government Policy Statement on Land Transport 2021/22-2030/31 (GPS) to carry out its functions in a way that delivers on the transport outcomes set by the government.
3. In the 2021 National Land Transport Programme, Waka Kotahi 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, Waka Kotahi is a co-funder of the local roading network. Waka Kotahi is therefore a significant investor in the infrastructure required to achieve the land use change and growth anticipated in the Taupō District Plan.

4. Overall, Waka Kotahi has an interest in the Taupō District Plan as a result of its role as a:
 - Transport investor – to maximise effective, efficient and strategic returns for New Zealand;
 - Planner of land transport networks – to ensure the integration of infrastructure and land use so as to support liveable communities and the development of an effective and resilient land transport network for customers;
 - Provide or access to and the use of the land transport system – to shape smart, efficient, safe and responsible transport choices; and
 - Manager of the state highway network – to deliver efficient, safe and responsible highway solutions for customers.
5. The Waka Kotahi submission seeks amendments to the Proposed Taupō District Plan in the following topic areas:
 - Amendments to the signage requirements as they relate to the state highway network,
 - Amendments to the permitted vehicle movements to state highways,
 - Amendments to the permitted number of dwellings per site where access is to a state highway,
 - Amendments to lighting levels in the rural environment; and,
 - Addition of reverse sensitivity provisions as they relate to the state highway.
 - Further assessment of the proposed industrial zones regarding site suitability and transport choice.
6. The changes requested are made to:
 - a. Ensure that Waka Kotahi can carry out its statutory obligations.
 - b. Reduce interpretation and processing complications for decision makers.
 - c. Provide clarity for all plan users.
7. Where a provision is not specified in Table 1 below, Waka Kotahi generally supports the way it is drafted.
8. Waka Kotahi could not gain an advantage in trade competition through this submission.

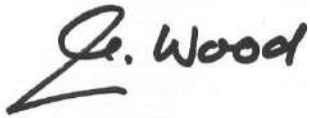
We seek the following decision from the local authority:

- a. Amend the provisions of the Proposed District Plan as detailed in Table 1 (attached) including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Waka Kotahi would like to be heard in support of its submission. If others make a similar submission, Waka Kotahi 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 (Planner) at Luke.Braithwaite@nzta.govt.nz and Waka Kotahi Environmental Planning Team at environmentalplanning@nzta.govt.nz.

Signature of person authorised to sign on behalf of Submitter:

A handwritten signature in black ink that reads "Mike Wood". The signature is written in a cursive style with a large, sweeping initial "M".

Mike Wood

Principal Planner

Consents and Approvals

Waka Kotahi NZ Transport Agency

Environmentalplanning@nzta.govt.nz

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Table 1: Decisions Sought on Taupō District Plan Changes 38, 42 & 43

The following table sets out the amendments sought to the Taupō District Plan Changes 38, 42 & 43. Table 2 identifies those provisions that Waka Kotahi supports.

Italics = *Taupō District Plan changes notified text*

Underline, not italics = proposed additions.

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

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
Plan Change 38 Strategic Directions 3 - Urban Form and Development	Objective 2.3.2	Support in part	<p>Waka Kotahi supports the integration of infrastructure with land uses, providing for land uses where these are anticipated by long term planning and where land uses are serviced by an appropriate level of infrastructure.</p> <p>However, Waka Kotahi seeks the addition of a provision seeking the reduction in vehicle kilometres travelled to recognise and provide for the NZ Emissions Reduction Plan transport targets through well connected compact urban form and mixed land uses that support this.</p>	<p>Amend as follows:</p> <p><i>1. The district develops in a cohesive, compact and structured way that:</i></p> <p>[...]</p> <p><u>e): reduces vehicle kilometres travelled (VKT) through well connected, compact urban form and mixed land use.</u></p>
	Policy 2.3.3	Support in part	<p>Waka Kotahi supports:</p> <ul style="list-style-type: none"> • the co-ordinated planning of future requirements for infrastructure, • providing for land uses where these are anticipated by long term planning, • discouraging fragmented development, • providing for land uses where the infrastructure has sufficient capacity, • managing subdivision and development where this would give rise to reverse sensitivity effects, and • ensuring there are appropriate multi-modal links. <p>However, Waka Kotahi considers that there is an opportunity to amend the wording of this policy to better provide for growth where this provides for better transport choices.</p>	<p>Amend as follows:</p> <p><i>2. Planning and development in urban environments will positively contribute to well-functioning urban environments including through providing a mix of land uses and multi modal transport choice with a focus on active and public transport.</i></p>
	Policy 2.4.3	Support in part	<p>Waka Kotahi supports this policy seeking subdivision and land use activities to result in positive climate change outcomes.</p>	<p><i>3. Urban and built development must be designed in a manner which considers the need to reduce both</i></p>

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			However, Waka Kotahi seeks the addition of a provision seeking the reduction in vehicle kilometres travelled to recognise and provide for the NZ Emissions Reduction Plan transport targets through well connected compact urban form and mixed land uses that support this.	<u>vehicle kilometres travelled (VKT) and greenhouse gas emissions associated with that development and resulting land use.</u>
Plan Change 42 – General Rural Environments Rules and Standards – General Rural Environment	Rule 4b.1.3	Support in Part	<p>Waka Kotahi supports providing for temporary activities, however, does not support this providing for activities where this is able to exceed all performance standards including vehicle movements.</p> <p>Waka Kotahi generally requires either access upgrades or temporary traffic management where vehicle movements are anticipated to be significant and impact on the safe and efficient functioning of the state highway.</p> <p>Waka Kotahi therefore seeks that any temporary activity located on a state highway shall not exceed a trip generation of 100 equivalent car movements per day.</p>	<p>Amend Provision:</p> <p><i>Any temporary activity, being an activity of up to a total of four operational days in any 6-month period, which exceeds any performance standard(s), is a permitted activity, provided that:</i></p> <ul style="list-style-type: none"> a) <i>There are no new permanent structures constructed; and</i> b) <i>Once the activity has ceased, the site (including vegetation and the surface of the ground of the site) is retained or re-instated to its condition prior to activity commencing, and</i> c) <i>An allowance of 14 non-operational days in any six month period associated with the activity is not exceeded; and</i> d) <u>Where access is reliant on a State highway, vehicle movements do not exceed 100 'equivalent vehicle movements' per day.</u>
	4b.1.11	Support	<p>The Waka Kotahi submission seeks to introduce new rules as it is noted that there are no rules relating to the control of reverse sensitivity effects that Objective 3b.2.5 and Policy 3b.2.13 seek to control.</p> <p>This will ensure potential adverse effects (including</p>	<p>New Provision:</p> <p>Impose new reverse sensitivity noise rule per Attachment 1 attached to the submission and/or introduce rules that achieve the same outcome for sensitive noise receivers.</p>

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			<p>conflicts between activities and reverse sensitivity effects) are mitigated.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>The proposed new rules provide for new or altered buildings within 100 m of the highway boundary, 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.</p>	

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			<p>There are no standards for outdoor road noise within the Taupō District Plan General Rural Zone. Waka Kotahi considers that outdoor noise can adversely affect the health, safety and wellbeing of people and communities. As such, Waka Kotahi considers that a new standard needs to be inserted In the Rural Chapter that addresses outdoor noise effects.</p> <p>The mitigation for adverse effects on human health proposed through these provisions reflects that in some circumstances, e.g., residential sites near the transport corridor, requiring a greater setback from the transport corridor boundary as a means of addressing noise and vibration effects may not always be practicable.</p> <p>The rules seek to ensure that building development options can still maximise the use of a site, while at the same time having standards for mitigating noise and vibration effects arising from the transport corridor.</p> <p><i>Note: Waka Kotahi is currently working on more accurate contour models which are likely to reduce the extent of the 100m setback. It is likely that these will be available at the further submission phase. Please refer to Appendix 2 being an assessment of plan provisions to provide for human health and amenity in accordance with section 32 of the Resource Management Act for details regarding our reasoning for the amendments</i></p>	

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			<i>sought and the modelling versus metric setback sought to be included at the further submission stage.</i>	
4b.2 Performance Standards – General Rural Environment	4b.2.1	Support in Part	<p>Waka Kotahi supports restricting the number of equivalent vehicle movements per day in the General Rural Environment. However, the threshold is considered too high for allotments with access to a state highway.</p> <p>Waka Kotahi 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. Waka Kotahi 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.</p> <p>Waka Kotahi therefore seeks that any activity located on a state highway route shall not exceed a trip generation of 100 equivalent vehicle movements per day without prior approval of Waka Kotahi.</p>	<p>Amend provision:</p> <ul style="list-style-type: none"> <i>i. 200 'equivalent vehicle movements' per day for the allotment where access is to a local road.</i> <i>ii. Papakāinga - 100 'equivalent vehicle movements' per day for the allotment or 24 per dwelling, whichever is the greater.</i> <i>iii. 100 'equivalent vehicle movements' per day where access is reliant on a State highway.</i> <p><i>EXCEPTION: This performance standard shall not apply to traffic movements involved in forest harvesting operations where access is to a local road.</i></p>
	4b.2.4	Support in part	<p>Waka Kotahi understands that it is appropriate to have a primary residential unit per site. However, Waka Kotahi does not consider that more than one primary residential unit should be permitted where access is gained from state highways as this does not allow for consideration of traffic effects associated with the dwellings. There are a number of locations where</p>	<p>Amend Provision:</p> <ul style="list-style-type: none"> <i>i. One primary residential unit per 10 hectares.</i> <i>ii. One primary residential unit per site where access is reliant on a state highway.</i> <p><i>EXCEPTION: Papakāinga.</i></p>

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			intensification of the use of accesses may have adverse safety implications.	
	4b.2.15	Support in Part	<p>Waka Kotahi supports restricting signage in the rural zone including restricting the number, size, type and design of the signage.</p> <p>However, where signage faces a state highway Waka Kotahi seeks further restrictions to ensure that signs visible from the state highway corridor (but not located within it) are safe and appropriate. Waka Kotahi seeks the prevention of signs outside but visible from the state highway that may adversely affect traffic safety and considers that the amendments proposed will result in this outcome.</p>	<p>Amend Provision:</p> <ul style="list-style-type: none"> i. <i>Maximum of one sign per allotment.</i> ii. <i>Maximum total face area of sign - 2m².</i> iii. <i>Signage must relate to the activity undertaken on the allotment.</i> iv. <i>No flashing, reflectorised or illuminated signage.</i> v. <i>One temporary sign per allotment for the sale of land or buildings of not more than 2m² total face area.</i> vi. <u>Where a sign faces a State highway:</u> <ul style="list-style-type: none"> e) <u>the sign must not display more than 6 words, symbols, or graphics and no more than 40 characters.</u> f) <u>Lettering and symbols used must be at least 160 millimetres in height.</u>
	New Provision	Support	<p>Waka Kotahi has identified that there are no lighting restrictions for the General Rural Environment, however there are restrictions for the Rural Lifestyle Environment (Rule 4b.4.12). As such, Waka Kotahi seeks the inclusion of a provision to control the obtrusive effects of lighting in the General Rural Environment.</p> <p>Per Table 3.2 of the Australian New Zealand Standard 4282.2019 the standard on Controlling the Obtrusive Effects of Outdoor Lighting; an A2 Zone (sparsely inhabited and semi-rural areas) should have a maximum artificial light level of 5 LUX.</p>	<p>New Provision:</p> <p><u>4b.2.16 - Maximum Artificial Light Level</u></p> <p><u>5 LUX (lumens per square meter) at the boundary.</u></p>

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
General Rules – Rural Lifestyle Environment	4b.3.5	Support in part	<p>Waka Kotahi supports providing for temporary activities, however, does not support this providing for activities where this is able to exceed all performance standards including vehicle movements.</p> <p>Waka Kotahi generally requires either access upgrades or temporary traffic management where vehicle movements are anticipated to be significant and impact on the safe and efficient functioning of the state highway.</p> <p>Waka Kotahi therefore seeks that any temporary activity located on a state highway shall not exceed a trip generation of 100 equivalent car movements per day without the prior approval of Waka Kotahi.</p>	<p>Amend Provision:</p> <p><i>i. Any temporary activity, being an activity of up to a total of four operational days in any 6-month period, which exceeds any performance standard(s), is a permitted activity, provided that:</i></p> <p><i>a. There are no new permanent structures constructed; and</i></p> <p><i>b. Once the activity has ceased, the site (including vegetation and the surface of the ground of the site) is re-instated to its condition prior to the activity commencing; and</i></p> <p><i>c. An allowance of 14 non-operational days in any six month period associated with the activity is not exceeded.</i></p> <p><u><i>d. Where access is reliant on a State highway, vehicle movements do not exceed 100 equivalent vehicle movements per day.</i></u></p>
	4b.3.7	Support	<p>The Waka Kotahi submission seeks to introduce new rules as it is noted that there are no rules relating to the control of reverse sensitivity effects that Objective 3b.2.5 and Policy 3b.2.13 seek to control.</p> <p>This will ensure potential adverse effects (including conflicts between activities and reverse sensitivity effects) are mitigated.</p> <p>The road network operates 24/7 with variability in</p>	<p>New Provision:</p> <p>Impose new reverse sensitivity noise rule per Attachment 1 attached to the submission and/or introduce rules that achieve the same outcome for sensitive noise receivers.</p>

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			<p>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.</p> <p>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.</p> <p>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.</p> <p>The proposed new rules provide for new or altered buildings within 100 m of the highway boundary, 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.</p> <p>Enhancements to buildings are best achieved at the time of construction. The further removed from the road corridor a building is, the less additional mitigation may</p>	

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			<p>be required. The noise level proposed is in accordance with World Health Organisation standards.</p> <p>There are no standards for outdoor road noise within the Taupō District Plan Rural Lifestyle Environment. Waka Kotahi considers that outdoor noise can adversely affect the health, safety and wellbeing of people and communities. As such, Waka Kotahi considers that a new standard needs to be inserted In the Rural Chapter that addresses outdoor noise effects.</p> <p>The mitigation for adverse effects on human health proposed through these provisions reflects that in some circumstances, e.g., residential sites near the transport corridor, requiring a greater setback from the transport corridor boundary as a means of addressing noise and vibration effects may not always be practicable.</p> <p>The rules seek to ensure that building development options can still maximise the use of a site, while at the same time having standards for mitigating noise and vibration effects arising from the transport corridor.</p> <p><i>Note: Waka Kotahi is currently working on more accurate contour models which are likely to reduce the extent of the 100m setback. It is likely that these will be available at the further submission phase. Please refer to Appendix 2 being an assessment of plan provisions to provide for human health and amenity in accordance</i></p>	

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			<p><i>with section 32 of the Resource Management Act for details regarding our reasoning for the amendments sought and the modelling versus metric setback sought to be included at the further submission stage.</i></p>	
4b.4 Performance Standards – Rural Lifestyle Environment	4b.4.1	Support in part	<p>Waka Kotahi supports restricting the number of equivalent vehicle movements per day in the Rural Lifestyle Environment. However, the threshold is considered too high for allotments with access to a state highway.</p> <p>Waka Kotahi generally requires a higher standard of access for activities that generate over 30 equivalent vehicle movements per day. Waka Kotahi 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.</p> <p>Waka Kotahi therefore seeks that any rural lifestyle activity located on a national or regional route shall not exceed a trip generation of 30 equivalent car movements per day.</p>	<p>Amend Provision:</p> <p><i>4b.4.1 Vehicle movements</i></p> <ul style="list-style-type: none"> <i>i. 50 equivalent vehicle movements per day for the allotment.</i> <i>ii. <u>30 equivalent vehicle movements per day for the allotment where access is gained from a state highway.</u></i> <i>iii. Papakāinga: 100 vehicle movements per day for the allotment or 24 per dwelling, whichever is the greater.</i> <p><i>EXCEPTION: This performance standard shall not apply to traffic movements involved in forest harvesting operations where access is to a local road.</i></p>
	4b.4.4	Support in part	<p>Waka Kotahi understands that it is appropriate to have a primary residential unit per site. However, Waka Kotahi does not consider that more than one primary residential unit should be permitted where access is gained from state highways as this does not allow for consideration of traffic effects associated with the dwellings. There are a number of locations where</p>	<p>Amend Provision:</p> <ul style="list-style-type: none"> <i>i. One residential unit per two hectares.</i> <i>ii. One residential unit per four hectares for lots adjoining the General Rural Environment.</i> <i>iii. <u>One primary residential unit per site where access is reliant on a state highway.</u></i> <p><i>EXCEPTION: Papakāinga.</i></p>

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			intensification of the use of accesses may have adverse safety implications.	
	4b.4.10	Support in part	<p>Waka Kotahi supports restricting signage in the rural zone including restricting the number, size, type and design of the signage.</p> <p>However, where signage faces a state highway Waka Kotahi seeks to ensure that signs visible from the state highway corridor (but not located within it) are safe and appropriate. Waka Kotahi seeks the prevention of signs outside but visible from the state highway that may adversely affect traffic safety and considers that the amendments proposed will result in this outcome.</p>	<p>Amend Provision:</p> <ul style="list-style-type: none"> i. <i>Maximum one sign per allotment.</i> ii. <i>Maximum total face area - 1m².</i> iii. <i>Signage must relate to the activity undertaken on the allotment.</i> iv. <i>No flashing, reflectorised or illuminated signs.</i> v. <i>One temporary sign per allotment, 2m² total face area, for the sale of land or buildings.</i> vi. <u>Where a sign faces a state highway:</u> <ul style="list-style-type: none"> a) <u>the sign must not display more than 6 words, symbols, or graphics and no more than 40 characters.</u> b) <u>Lettering and symbols used must be at least 160 millimetres in height.</u>
	4b.4.12	Support in Part	Waka Kotahi supports controlling the obtrusive effects of lighting; however, the proposed lighting level is not consistent with Table 3.2 of the Australian New Zealand Standard 4282.2019 the standard on Controlling the Obtrusive Effects of Outdoor Lighting. For an A2 Zone (sparsely inhabited and semi-rural areas) this identifies an appropriate lighting level of 5 LUX.	<p>Amend Provision:</p> <ul style="list-style-type: none"> i. <u>8 5 LUX (lumens per square meter) at the boundary.</u>
Plan Change 43 - Taupō Industrial Zone		Support in part	Waka Kotahi appreciates that that the Taupō Future Industrial Land Option Economic Multi-Criteria Analysis 2022 indicates that there is a shortfall in industrial land supply.	<p>Waka Kotahi seeks for the following relief:</p> <p>For an assessment to be undertaken as to how Site 4 and Site 7 will align with the Waikato Regional Policy Statement - Change 1, the NZ Emissions Reduction</p>

Chapter	Plan Provision	Support / Oppose	Reasons	Relief Sought
			<p>However, Waka Kotahi considers that not enough investigation has been undertaken against key documents to show the suitability of this rezoning with specific regard to:</p> <ul style="list-style-type: none"> • The Proposed Waikato Regional Policy Statement Change 1 - Appendix 13 which addresses the approach to out of sequence and unanticipated developments in non-Future Proof Tier 3 authorities. • The NZ Emissions Reduction Plan which sets out key aspects of the planning and infrastructure systems that are needed to support positive climate outcomes. Transport Targets 1 (reduce VKT) & 3 (reduce emissions from freight transport) are particularly relevant to this plan change. <p>In addition, in order for these two locations (particularly Site 4 - Broadlands) to be considered suitable for rezoning as industrial land, further evaluation of the ability to reduce VKT and service the sites with active and public transport should be undertaken given the Transport Assessment identifies these sites as poor (Site 7) and very poor (Site 4) in regard to walking and cycling connections.</p>	<p>Plan, reduction in vehicle kilometres travelled (VKT) and the provision of active and public transport.</p> <p>Subject to the assessments indicating that these measures can be achieved, provision should be made through the rules/standards to ensure delivery of these measures for Site 4 and Site 7.</p>

Table 2: Provision of Taupō District Plan Changes 38 & 42 That Waka Kotahi Supports

The following table identifies those provisions of Plan Change 38 & 42 that are supported because they align with our statutory objectives and resulting in an affordable, integrated, safe, responsive, and sustainable land transport system; or these align with our vision is for a sustainable, multi-modal land transport system where public transport, active or shared modes are the first choice for most daily transport needs.

Chapter	Plan Provision	Support / Oppose	Relief Sought
Plan Change 38 Strategic Direction 4 -Climate Change	Objective 2.4.2	Support	Retain as notified.
Strategic Direction 5 -Significant and Local Infrastructure	Objective 2.5.2	Support	Retain as notified.
	Policy 2.5.3	Support	Retain as notified.
Plan Change 42 – General Rural Environments	Objective 3b.2.3	Support	Retain as notified
	Objective 3b.2.5	Support	Retain as notified.
	Objective 3b.2.6	Support	Retain as notified.
	Policy 3b.2.9	Support	Retain as notified
	Policy 3b.2.10	Support	Retain as notified

Chapter	Plan Provision	Support / Oppose	Relief Sought
	Policy 3b.2.11	Support	Retain as notified.
	Policy 3b.2.13	Support	Retain as notified.
	Policy 3b.2.14	Support	Retain as notified.
	Policy 3b.2.15	Support	Retain as notified.
Rural Lifestyle Environment	Objective 3b.3.1	Support	Retain as notified.
	Objective 3b.3.2	Support	Retain as notified.
	Objective 3b.3.3	Support	Retain as notified.
	Objective 3b.3.5	Support	Retain as notified.
	Policy 3b.3.9	Support	Retain as notified.
	Policy 3b.3.12	Support	Retain as notified.
4b.2 Performance Standards – General Rural Environment	4b.2.7	Support	Retain as notified.
4b.4 Performance Standards – Rural Lifestyle Environment	4b.4.5	Support	Retain as notified.
4b.5 Subdivision Rules – General Rural Environment	4b.5.1	Support	Retain as notified.

Appendix One:

Impose new reverse sensitivity noise rule as follows:

1. Permitted Activity Rule

At any point within 100 metres from the edge of a state highway carriageway and which receives more than 57 dBLAeq(24h) transport noise:

Advice Note: Waka Kotahi holds information which can confirm whether the proposed location of noise sensitive activity will receive more or less than 57 dBLAeq(24h). Where Waka Kotahi confirms that the proposed location of a noise sensitive activity will be less than 57 dBLAeq(24h), the following rules do not apply.

Outdoor road noise

- 1) Any noise sensitive activity with a noise sensitive room in a new building, or alteration to an existing building, that contains an activity sensitive to noise where there is a noise barrier at least 3 metres high which blocks the line-of-sight to the road surface from all points 1.5 metres above ground level within the proposed notional boundary.

Indoor road noise

- 2) Any noise sensitive activity with a noise sensitive room in a new building, or alteration to an existing building, that contains an activity sensitive to noise where the building or alteration is:
 - a) Designed, constructed and maintained to achieve indoor design noise levels resulting from the road not exceeding the maximum values in Table 1; or
 - b) 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.

Table 1

Occupancy/activity	Maximum road noise level $L_{Aeq}(24h)$
<i>Building type: Residential</i>	
Sleeping spaces	40 dB
All other habitable rooms	40 dB
<i>Building type: Education</i>	
Lecture rooms/theatres, music studios, assembly halls	35 dB
Teaching areas, conference rooms, drama studios, sleeping areas	40 dB
Libraries	45 dB
<i>Building type: Health</i>	
Overnight medical care, wards	40 dB
Clinics, consulting rooms, theatres, nurses' stations	45 dB
<i>Building type: Cultural</i>	
Places of worship, marae	35 dB

Mechanical ventilation

- 3) If windows must be closed to achieve the design noise levels in clause 2(a), the building is designed, constructed and maintained with a mechanical ventilation system that:
 - a) For habitable rooms for a noise sensitive activity, achieves the following requirements:

- i. Provides mechanical ventilation to satisfy clause G4 of the New Zealand Building Code; and
 - ii. 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
 - iii. provides relief for equivalent volumes of spill air; and
 - iv. provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18CC and 25CC; and
 - v. does not generate more than 35 dB LAeq(30s) when measured 1 metre away from any grille or diffuser.
- b) For other spaces, is as determined by a suitably qualified and experienced person.

Indoor road vibration

- 4) Any noise sensitive activity with a noise sensitive room in a new building or alterations to existing buildings containing a noise sensitive activity, closer than 40 metres to the carriageway of a state highway, is designed constructed and maintained to achieve road vibration levels not exceeding 0.3mm/s vw.95.

Design report

- 5) A report is submitted by a suitably qualified and experienced person to the council demonstrating compliance with clauses (1) to (4) above (as relevant) prior to the construction or alteration of any building containing a noise sensitive activity. In the design road noise is based on measured or predicted noise levels plus 3 dB.

2. Restricted Discretionary Activity Rule

Any new or altered noise sensitive activity which does not comply with Permitted Activity Rule.

Restricted Discretionary Activity – Matters of Discretion

Discretion is restricted to:

- (a) Location of the building;
- (b) The effects of the non-compliance on the health and amenity of occupants;
- (c) Topographical, ground conditions or building design features that will mitigate noise or vibration effects; and
- (d) The outcome of any consultation with the NZ Transport Agency.

Restricted Discretionary Activity – Assessment Criteria Discretion is restricted to:

- (a) Whether the location of the building minimises effects;
- (b) Alternative mitigation which manages the effects of the non-compliance on the health and amenity of occupants;
- (c) Any identified topographical, ground conditions or building design features that will mitigate noise and vibration effects or; and
- (d) The outcome of any consultation with the NZ Transport Agency.

Appendix 2: Assessment of Plan Provisions to Provide for Human Health and Amenity in accordance with section 32 of the Resource Management Act



First name: Alana

Last name: Delich

On behalf of:
Taupō Climate Action Group

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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
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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.

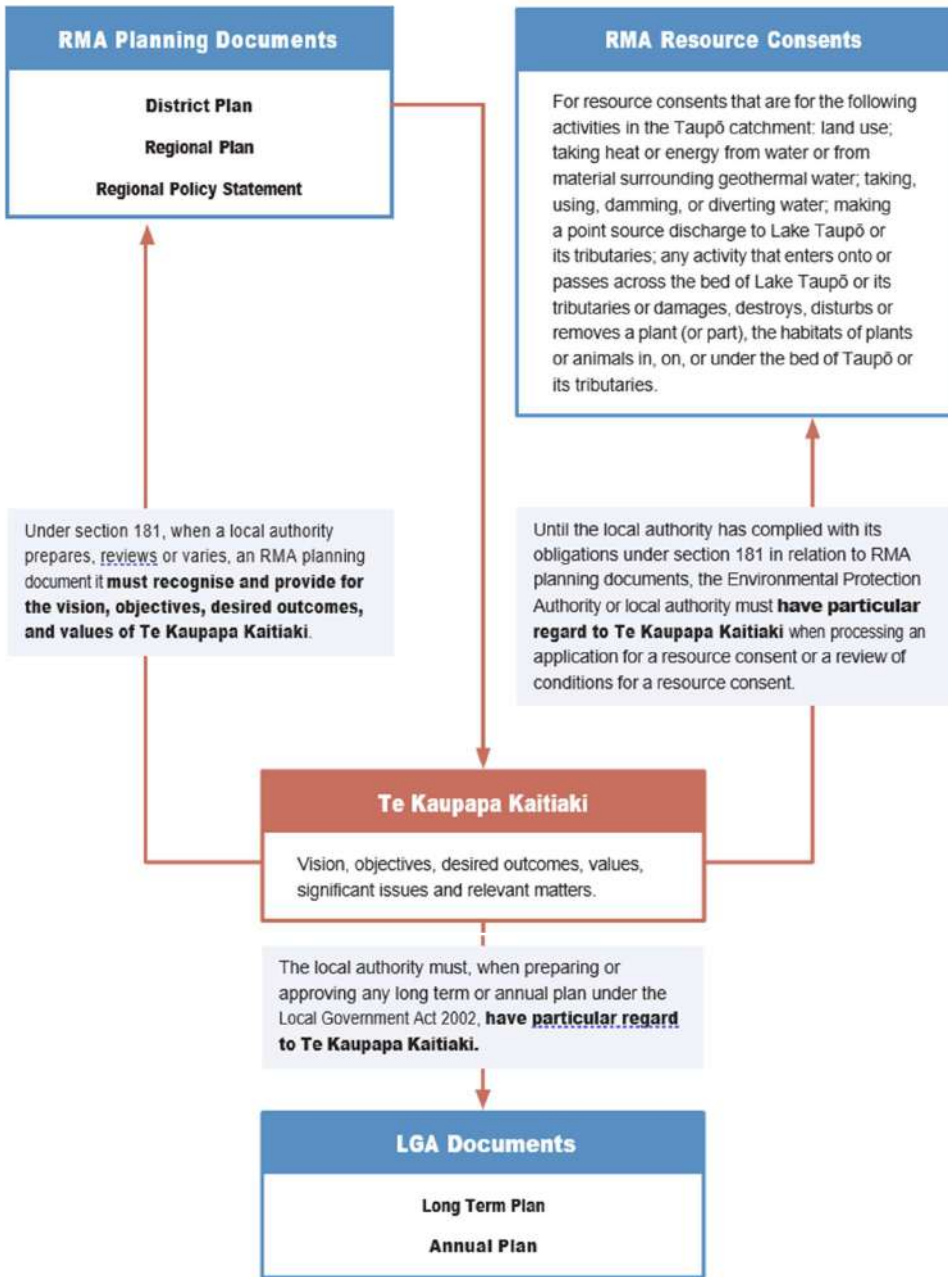
In addition, whenever a consent authority (Taupo District Council) is processing or making a decisions on an application for resource consent (including any review of the conditions of a resource consent) the consent authority must **have particular regard to** the vision, objectives, values, and desired 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*)

How Te Kaupapa Kaitiaki will affect resource management planning and obligations for local government documents



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 orange (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
Waea: 021 368 566 | Imera: geoera@xtra.co.nz



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First name: James

Last name: Ryan

On behalf of:
Manawa Energy

Postal address:

Suburb:

City:

Country: New Zealand

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Daytime Phone: 0278 2340396

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

Original Submitter: #22 Penny Cairns (PO Box 20176, Bishopdale, Christchurch, New Zealand, 8543)

Original Point: #22.17 2.2.2 Objective

Points: FS209.1

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

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

All

Original Submitter: #22 Penny Cairns (PO Box 20176, Bishopdale, Christchurch, New Zealand, 8543)

Original Point: #22.18 2.2.3 Policy

Points: FS209.2

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

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

All

Original Submitter: #22 Penny Cairns (PO Box 20176, Bishopdale, Christchurch, New Zealand, 8543)

Original Point: #22.19 2.2.3 Policy

Points: FS209.3

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #22 Penny Cairns (PO Box 20176, Bishopdale, Christchurch, New Zealand, 8543)

Original Point: #22.23 Chapter 2 Strategic Directions

Points: FS209.4

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy in part opposes this submission as renewable electricity generation has a functional and operational need to be in the rural environment and therefore cannot be excluded.

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

All and add provisions that allow for renewable electricity generation.

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)

Original Point: #26.59 Plan Change 38 - Strategic Directions

Points: FS209.5

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy in part opposes this submission as renewable electricity generation has a functional and operational need to be in the rural environment and therefore cannot be excluded.

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

All and add provisions that provide for renewable electricity generation

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)

Original Point: #26.60 Plan Change 38 - Strategic Directions

Points: FS209.6

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #29 Megan Kettle (Unknown, New Zealand, Unknown)

Original Point: #29.10 2.5 Strategic Direction 5 Significant and Local Infrastructure

Points: FS209.7

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #46 Chris Marshall (, New Zealand)

Original Point: #46.6 2.4 Strategic Direction 4 Climate Change

Points: FS209.8

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission

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

All

Original Submitter: #46 Chris Marshall (, New Zealand)

Original Point: #46.8 2.4.3 Policy

Points: FS209.9

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission

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

All

Original Submitter: #46 Chris Marshall (, New Zealand)

Original Point: #46.9 2.4.3 Policy

Points: FS209.10

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission

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

All

Original Submitter: #95 Joan Forret (Private Bag 3077, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #95.1 Plan Change 38 - Strategic Directions

Points: FS209.11

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #95 Joan Forret (Private Bag 3077, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #95.2 2.1 Strategic Direction 1 Tangata Whenua

Points: FS209.12

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #95 Joan Forret (Private Bag 3077, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #95.6 2.1 Strategic Direction 1 Tangata Whenua

Points: FS209.13

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission. Iwi settlement acts do not provide for a higher order status and iwi documents are only provided for in District planning.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

All

Original Submitter: #95 Joan Forret (Private Bag 3077, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #95.9 2.6 Strategic Direction 6 Natural Environment Values

Points: FS209.14

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission requiring offsetting to be a net gain.

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

All

Original Submitter: #95 Joan Forret (Private Bag 3077, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #95.14 2.6 Strategic Direction 6 Natural Environment Values

Points: FS209.15

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission, renewable electricity generation has a functional and operational need to be in areas on SNA as that is the location of

the energy resource.

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

All

Original Submitter: #66 Michelle Phillips (PO Box 162, Reporoa, New Zealand, 3060)

Original Point: #66.2 2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai

Points: FS209.16

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.1 2.1.3 Policy

Points: FS209.17

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.2 Plan Change 38 - Strategic Directions

Points: FS209.18

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.3 Plan Change 38 - Strategic Directions

Points: FS209.19

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.4 Plan Change 38 - Strategic Directions

Points: FS209.20

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.5 Plan Change 38 - Strategic Directions

Points: FS209.21

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.6 Plan Change 38 - Strategic Directions

Points: FS209.22

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.7 Plan Change 38 - Strategic Directions

Points: FS209.23

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.8 Plan Change 38 - Strategic Directions

Points: FS209.24

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.9 Plan Change 38 - Strategic Directions

Points: FS209.25

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.10 Plan Change 38 - Strategic Directions

Points: FS209.26

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.11 Plan Change 38 - Strategic Directions

Points: FS209.27

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.12 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points:** FS209.28

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.13 Amendments to the Definitions of the Taupō District Plan Section 10 **Points:** FS209.29

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.14 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.30**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.15 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.31**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.15 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.32**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.16 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.33**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.17 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.34**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.18 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.35**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.19 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.36**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.22 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.37**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.20 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.38**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.21 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.39**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.23 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.40**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.24 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.41**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.27 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.42**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.26 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.43**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.28 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.44**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.29 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.45**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.32 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.46**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.31 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.47**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.33 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.48**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.34 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.49**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.32 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.50**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.35 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.51**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.36 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.52**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.37 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.53**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.38 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.54**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.38 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.55**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.39 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.56**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.40 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.57**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.41 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.58**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.42 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.59**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.43 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.60**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.44 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.61**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.45 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.62**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.46 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.63**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.47 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.64**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.48 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.65**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.49 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.66**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.50 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.67**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.51 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.68**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.52 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.69**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.53 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.70**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.54 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.71**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.55 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.72**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.56 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.73**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.57 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.74**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)
Original Point: #68.58 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.75**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.59 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.76**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.60 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.77**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.61 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.78**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.62 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.79**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.63 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.80**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #68 Hayley Stronge (PO Box 13025, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #68.64 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.81**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.1 2.3.2 Objectives **Points: FS209.82**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.2 2.3.3 Policy

Points: FS209.83

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.3 2.4 Strategic Direction 4 Climate Change

Points: FS209.84

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.4 2.4.2 Objective

Points: FS209.85

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.5 2.4.3 Policy

Points: FS209.86

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.6 2.5 Strategic Direction 5 Significant and Local Infrastructure

Points: FS209.87

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.7 2.5.2 Objectives

Points: FS209.88

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.8 2.5.3 Policy

Points: FS209.89

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.9 2.6.2 Objectives

Points: FS209.90

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.10 2.6.3 Policy

Points: FS209.91

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.11 Amendments to the Definitions of the Taupō District Plan Section 10 **Points: FS209.92**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.12 3b.1 Introduction

Points: FS209.93

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.13 Objective 3b.2.1 Enable Primary Production

Points: FS209.94

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.14 Objective 3b.2.2 Maintaining the established General Rural character

Points: FS209.95

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.15 Objective 3b.2.3 Rural industry

Points: FS209.96

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.16 Objective 3b.2.4 Other activities

Points: FS209.97

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.17 Objective 3b.2.5 Avoidance of reverse sensitivity

Points: FS209.98

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.18 Objective 3b.2.6 Impacts on infrastructure

Points: FS209.99

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.19 Policy 3b.2.9 Maintaining the established character

Points: FS209.100

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.20 Policy 3b.2.10 Residential units

Points: FS209.101

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.21 Policy 3b.2.12 Minor residential unit

Points: FS209.102

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.22 Policy 3b.2.13 Avoiding reverse sensitivity

Points: FS209.103

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.23 Policy 3b.2.14 Commercial and industrial activity **Points: FS209.104**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.24 Policy 3b.2.15 Allotment size **Points: FS209.105**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.25 Objective 3b.3.1 Maintain the character of the Rural Lifestyle Environment **Points: FS209.106**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.26 Objective 3b.3.2 Avoid reverse sensitivity **Points: FS209.107**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.27 Objective 3b.3.3 Commercial and industrial activities

Points: FS209.108

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.28 Objective 3b.3.4 Consolidate rural lifestyle activities

Points: FS209.109

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.29 Objective 3b.3.6 Impacts on community infrastructure

Points: FS209.110

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.30 Policy 3b.3.9 Character of the Rural Lifestyle Environment **Points: FS209.111**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.31 Policy 3b.3.10 Lot sizes and setbacks for allotments adjoining the General Rural Environment **Points: FS209.112**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.32 Policy 3b.3.12 Minor residential unit **Points: FS209.113**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)
Original Point: #84.33 4b.1.1 Activities in the General Rural Environment **Points: FS209.114**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.34 4b.1.2 Minor residential units

Points: FS209.115

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.35 4b.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Steamfields

Points: FS209.116

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.36 4b.1.5 Commercial and industrial activities, and home businesses, **Points: FS209.117**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.37 4b.1.7 High voltage transmission lines

Points: FS209.118

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

All

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.38 4b.1.8 Buildings within Outstanding Landscape Areas

Points: FS209.119

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.39 4b.1.9 Earthworks within Outstanding Landscape Areas

Points: FS209.120

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.40 4b.2.1 Vehicle movements

Points: FS209.121

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.41 4b.2.9 Maximum Noise - Limits

Points: FS209.122

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.42 4b.2.10 Maximum Noise - Construction Noise

Points: FS209.123

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.43 4b.2.11 Maximum Noise - Electricity Generation Core Sites

Points: FS209.124

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.44 4b.2.13 Maximum Noise - Other

Points: FS209.125

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.45 4b.5.3 Subdivision - Rural Lifestyle Environment that does not adjoin the General Rural Environment

Points: FS209.126

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.46 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.127**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.47 Plan Change 38 - Strategic Directions

Points: FS209.128

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.48 Amendments to the Definitions of the Taupō District Plan Section **Points: FS209.129**

10

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.49 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.130**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #84 Alice Lin (PO Box 90477, Victoria Street West, Auckland, New Zealand, 1142)

Original Point: #84.50 Amendments to the Definitions of the Taupō District Plan Section **Points: FS209.131**

10

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.1 Plan Change 38 - Strategic Directions

Points: FS209.132

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.2 Chapter 2 Strategic Directions

Points: FS209.133

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.3 2.1 Strategic Direction 1 Tangata Whenua

Points: FS209.134

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.4 2.1.2 Objective

Points: FS209.135

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.5 2.1.3 Policy

Points: FS209.136

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.6 2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai

Points: FS209.137

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.7 2.3 Strategic Direction 3 Urban Form and Development

Points: FS209.138

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.8 2.3.2 Objectives

Points: FS209.139

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.9 2.3.3 Policy

Points: FS209.140

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.10 2.4 Strategic Direction 4 Climate Change

Points: FS209.141

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.11 2.4.2 Objective

Points: FS209.142

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.12 2.4.3 Policy

Points: FS209.143

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.13 2.5 Strategic Direction 5 Significant and Local Infrastructure

Points: FS209.144

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.14 2.5.2 Objectives

Points: FS209.145

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.15 2.5.3 Policy

Points: FS209.146

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.16 2.6 Strategic Direction 6 Natural Environment Values

Points: FS209.147

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.17 2.6.2 Objectives

Points: FS209.148

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.18 2.6.3 Policy

Points: FS209.149

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.19 2.2.2 Objective

Points: FS209.150

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.20 2.2.3 Policy

Points: FS209.151

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.21 2.2.3 Policy

Points: FS209.152

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

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: FS209.153

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.23 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS209.154**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.24 Amendments to the Definitions of the Taupō District Plan Section **Points: FS209.155**

10

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.25 Amendments to the Definitions of the Taupō District Plan Section **Points: FS209.156**

10

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.26 3b.1 Introduction

Points: FS209.157

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.27 Objective 3b.2.1 Enable Primary Production

Points: FS209.158

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.28 Objective 3b.2.2 Maintaining the established General Rural character

Points: FS209.159

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.29 Objective 3b.2.3 Rural industry

Points: FS209.160

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.30 Objective 3b.2.4 Other activities

Points: FS209.161

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.31 Objective 3b.2.5 Avoidance of reverse sensitivity

Points: FS209.162

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.32 Objective 3b.2.6 Impacts on infrastructure

Points: FS209.163

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.33 Policy 3b.2.9 Maintaining the established character

Points: FS209.164

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.34 Policy 3b.2.10 Residential units

Points: FS209.165

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.35 Policy 3b.2.12 Minor residential unit

Points: FS209.166

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.36 Policy 3b.2.13 Avoiding reverse sensitivity

Points: FS209.167

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.37 Policy 3b.2.14 Commercial and industrial activity

Points: FS209.168

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.38 Policy 3b.2.15 Allotment size

Points: FS209.169

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.39 Objective 3b.3.1 Maintain the character of the Rural Lifestyle Environment

Points: FS209.170

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.40 Objective 3b.3.2 Avoid reverse sensitivity

Points: FS209.171

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.41 Objective 3b.3.3 Commercial and industrial activities

Points: FS209.172

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.42 Objective 3b.3.4 Consolidate rural lifestyle activities

Points: FS209.173

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.43 Objective 3b.3.6 Impacts on community infrastructure

Points: FS209.174

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.44 Policy 3b.3.9 Character of the Rural Lifestyle Environment

Points: FS209.175

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.45 Policy 3b.3.10 Lot sizes and setbacks for allotments adjoining the General Rural Environment

Points: FS209.176

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.46 Policy 3b.3.12 Minor residential unit

Points: FS209.177

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.47 4b.1.1 Activities in the General Rural Environment

Points: FS209.178

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.48 4b.1.2 Minor residential units

Points: FS209.179

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.49 4b.1.3 Temporary Activities

Points: FS209.180

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.50 4b.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Steamfields **Points: FS209.181**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.51 4b.1.5 Commercial and industrial activities, and home businesses, **Points: FS209.182**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.52 4b.1.7 High voltage transmission lines **Points: FS209.183**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.53 4b.1.8 Buildings within Outstanding Landscape Areas **Points: FS209.184**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.54 4b.1.9 Earthworks within Outstanding Landscape Areas

Points: FS209.185

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.55 4b.2.1 Vehicle movements

Points: FS209.186

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.56 4b.2.5 Maximum building height

Points: FS209.187

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.57 4b.2.6 Minimum building setbacks

Points: FS209.188

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.58 4b.2.7 Minor residential units

Points: FS209.189

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.59 4b.2.8 Commercial and industrial activities, and home businesses **Points:** FS209.190

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.60 4b.2.9 Maximum Noise - Limits

Points: FS209.191

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.61 4b.2.10 Maximum Noise - Construction Noise

Points: FS209.192

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.62 4b.2.11 Maximum Noise - Electricity Generation Core Sites

Points: FS209.193

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.63 4b.2.12 Maximum Noise - Well Drilling and Testing

Points: FS209.194

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.64 4b.2.13 Maximum Noise - Other

Points: FS209.195

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.65 4b.2.14 Parking, Loading and Access

Points: FS209.196

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.66 4b.2.15 Signage

Points: FS209.197

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.67 4b.5.1 Subdivision - General Rural Environment

Points: FS209.198

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.68 4b.5.2 Subdivision - Rural Lifestyle Environment that adjoins the General Rural Environment

Points: FS209.199

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.69 4b.5.3 Subdivision - Rural Lifestyle Environment that does not adjoin the General Rural Environment

Points: FS209.200

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.70 4b.5.4 Subdivision - Default Activity Status

Points: FS209.201

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)
Original Point: #93.71 4b.5.5 Subdivision resulting in a new public road, or extension of existing public road

Points: FS209.202

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.72 4b.5.6 Subdivision - Other

Points: FS209.203

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.73 4b.5.7 Subdivision - Outstanding Landscape Areas

Points: FS209.204

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.74 4b.5.8 Subdivision - Bonus Lots

Points: FS209.205

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.75 4b.5.9 Subdivision - More than 12 allotments

Points: FS209.206

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.76 Planning Maps

Points: FS209.207

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.77 Plan Change 43 - Taupō Industrial Zone

Points: FS209.208

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.78 Amendments to the Definitions of the Taupō District Plan Section 10 **Points:** FS209.209

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.79 Planning Maps

Points: FS209.210

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.80 Planning Maps

Points: FS209.211

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #93 Mark Chrisp (PO Box 1307, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #93.81 Planning Maps

Points: FS209.212

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #89 Ashiley Sycamore (Private Bag 3072, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #89.3 2.1 Strategic Direction 1 Tangata Whenua

Points: FS209.213

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #89 Ashiley Sycamore (Private Bag 3072, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #89.4 2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai

Points: FS209.214

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

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

All

Original Submitter: #89 Ashiley Sycamore (Private Bag 3072, Waikato Mail Centre, Hamilton, New Zealand, 3240)

Original Point: #89.1 Plan Change 38 - Strategic Directions

Points: FS209.215

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as there will be a separate process and time-frames for the District Council to implement this NPS-IB if and when it comes into effect.

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

All

Original Submitter: #91 Colin Guyton (Unknown, New Zealand, Unknown)

Original Point: #91.3 2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai

Points: FS209.216

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

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

All

Original Submitter: #91 Colin Guyton (Unknown, New Zealand, Unknown)

Original Point: #91.5 2.4 Strategic Direction 4 Climate Change

Points: FS209.217

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #91 Colin Guyton (Unknown, New Zealand, Unknown)

Original Point: #91.6 2.5 Strategic Direction 5 Significant and Local Infrastructure

Points: FS209.218

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission.

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

All

Original Submitter: #91 Colin Guyton (Unknown, New Zealand, Unknown)

Original Point: #91.7 2.6 Strategic Direction 6 Natural Environment Values

Points: FS209.219

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #101 Jane Penton (27 Te Hātepe Avenue, Taupo, New Zealand, 3330)

Original Point: #101.1 2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai **Points: FS209.220**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

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

All

Original Submitter: #101 Jane Penton (27 Te Hātepe Avenue, Taupo, New Zealand, 3330)

Original Point: #101.2 2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai **Points: FS209.221**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

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

All

Original Submitter: #104 Gurv Singh (PO Box 2628, Wellington, New Zealand, 6140)

Original Point: #104.3 2.2.2 Objective **Points: FS209.222**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

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

All

Original Submitter: #110 Trudi Burney (31 Gilberthorpes Road, Islington, Christchurch, New Zealand, 8042)

Original Point: #110.6 2.5.3 Policy

Points: FS209.223

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission - clarification for these terms would be beneficial since there is a large amount of Nationally significant infrastructure and Regional significant infrastructure in the region

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

All

Original Submitter: #110 Trudi Burney (31 Gilberthorpes Road, Islington, Christchurch, New Zealand, 8042)

Original Point: #110.7 2.5.3 Policy

Points: FS209.224

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission.

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

All

Original Submitter: #115 George Asher (Unknown, New Zealand, Unknown)

Original Point: #115.4 2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai **Points: FS209.225**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

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

All

Original Submitter: #115 George Asher (Unknown, New Zealand, Unknown)

Original Point: #115.5 2.2.3 Policy

Points: FS209.226

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

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

All

Original Submitter: #115 George Asher (Unknown, New Zealand, Unknown)

Original Point: #115.8 2.2.3 Policy

Points: FS209.227

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

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

All

Original Submitter: #115 George Asher (Unknown, New Zealand, Unknown)

Original Point: #115.11 2.5.2 Objectives

Points: FS209.228

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Support in part - could include wider community to clarify the statement that it is protecting all of the Taupo community.

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

All

Original Submitter: #115 George Asher (Unknown, New Zealand, Unknown)

Original Point: #115.12 2.5.3 Policy

Points: FS209.229

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission as - we require a greater degree of clarification the practical meaning of te oranga o te taiao, te oranga o nga taonga tuku iho, te oranga o te tangata in Council's definitions

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

All

Original Submitter: #115 George Asher (Unknown, New Zealand, Unknown)

Original Point: #115.33 2.5.3 Policy

Points: FS209.230

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes - The wording proposed does not align with the NPS-REG that states that REG has benefit for social, and economic wellbeing pf people and communities.

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

All

Original Submitter: #9 Lucy Edwards (C/- Tonkin & Taylor Ltd , Wellington, New Zealand, 6140)

Original Point: #9.6 Plan Change 42 - General Rural and Rural Lifestyle Environments

Points: FS209.231

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this position

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

All

Original Submitter: #11 Douglas Colin Wallace (208 Tukairangi Road, RD 5, Taupo, New Zealand, 3385)

Original Point: #11.3 4b.4.12 Maximum Artificial Light Level

Points: FS209.232

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission

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

All

Original Submitter: #22 Penny Cairns (PO Box 20176, Bishopdale, Christchurch, New Zealand, 8543)

Original Point: #22.5 Objective 3b.2.1 Enable Primary Production

Points: FS209.233

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this positionandnbsp;

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

All

Original Submitter: #22 Penny Cairns (PO Box 20176, Bishopdale, Christchurch, New Zealand, 8543)

Original Point: #22.8 Objective 3b.2.5 Avoidance of reverse sensitivity

Points: FS209.234

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this position as there are other established and lawful activities that have a functional and operational need to be in the rural environment.

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

All

Original Submitter: #22 Penny Cairns (PO Box 20176, Bishopdale, Christchurch, New Zealand, 8543)

Original Point: #22.11 Policy 3b.2.13 Avoiding reverse sensitivity

Points: FS209.235

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this position as there are other established and lawful activities that have a functional and operational need to be in the rural environment, and which may not require set backs from primary production.

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

All

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)

Original Point: #26.3 Plan Change 38 - Strategic Directions

Points: FS209.236

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy in part supports this position as renewable electricity generation is not a rural industry. However, renewable electricity has a functional and operational need to be in the rural environment.

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

All

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)

Original Point: #26.4 Plan Change 38 - Strategic Directions

Points: FS209.237

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy in part supports this position as renewable electricity generation has a need for ancillary earthworks. However, renewable electricity has a functional and operational need to be in the rural environment.

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

All

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)

Original Point: #26.10

Points: FS209.238

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this position as the Taupo DC should give effect to all existing NPS documents

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

All

Original Submitter: #78 Dominic Adams (, New Zealand)

Original Point: #78.3 Amendments to the Definitions of the Taupō District Plan Section 10 **Points: FS209.239**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #78 Dominic Adams (, New Zealand)

Original Point: #78.5 Objective 3b.2.5 Avoidance of reverse sensitivity

Points: FS209.240

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #91 Colin Guyton (Unknown, New Zealand, Unknown)

Original Point: #91.12 3b.2 Objectives and Policies - General Rural Environment

Points: FS209.241

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission.

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

All

Original Submitter: #91 Colin Guyton (Unknown, New Zealand, Unknown)

Original Point: #91.13 3b.2 Objectives and Policies - General Rural Environment

Points: FS209.242

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission and its intent to seek clarity of policy direction.

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

All

Original Submitter: #101 Jane Penton (27 Te Hātepe Avenue, Taupo, New Zealand, 3330)

Original Point: #101.7 4b Rural Environment

Points: FS209.243

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission, as provision needs to be made for infrastructure and activities that have a functional requirement to be located in these 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

All

Original Submitter: #101 Jane Penton (27 Te Hātepe Avenue, Taupo, New Zealand, 3330)

Original Point: #101.8 4b Rural Environment

Points: FS209.244

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission, as provision needs to be made for infrastructure and activities that have a functional requirement to be located in these 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

All

Original Submitter: #106 Tim Lester (127 Alexandra Street, Hamilton Central, Hamilton, New Zealand, 3204)

Original Point: #106.15 Objective 3b.2.4 Other activities

Points: FS209.245

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #106 Tim Lester (127 Alexandra Street, Hamilton Central, Hamilton, New Zealand, 3204)
Original Point: #106.17 Policy 3b.2.13 Avoiding reverse sensitivity **Points: FS209.246**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #106 Tim Lester (127 Alexandra Street, Hamilton Central, Hamilton, New Zealand, 3204)
Original Point: #106.18 Objective 3b.3.2 Avoid reverse sensitivity **Points: FS209.247**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #110 Trudi Burney (31 Gilberthorpes Road, Islington, Christchurch, New Zealand, 8042)
Original Point: #110.1 Plan Change 38 - Strategic Directions **Points: FS209.248**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #110 Trudi Burney (31 Gilberthorpes Road, Islington, Christchurch, New Zealand, 8042)
Original Point: #110.2 Plan Change 38 - Strategic Directions **Points: FS209.249**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission

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

All

Original Submitter: #110 Trudi Burney (31 Gilberthorpes Road, Islington, Christchurch, New Zealand, 8042)

Original Point: #110.13 3b Rural Environment Chapter

Points: FS209.250

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission, the Council should be providing for all NPS documents and implementing all existing National Planning Standards.

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

All

Original Submitter: #110 Trudi Burney (31 Gilberthorpes Road, Islington, Christchurch, New Zealand, 8042)

Original Point: #110.14 3b.1 Introduction

Points: FS209.251

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission.

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

All

Original Submitter: #112 Annabelle Lee (Unknown, New Zealand, Unknown)

Original Point: #112.9 4b.2.9 Maximum Noise - Limits

Points: FS209.252

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Manawa Energy supports this submission.

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

All

Original Submitter: #114 Alana Delich (72 Hinemoa Avenue, Taupo, New Zealand, 3330)

Original Point: #114.13 4b Rural Environment

Points: FS209.253

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Manawa Energy opposes this submission, as provision needs to be made for infrasture and activities that have a functional requirement to be located in these 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

All

Attached Documents

File
Manawa Energy Taupo DC Further Submissions 38 and 42 April 2023



Further Submissions Taupō District Council District Plan Changes 38 & 42

Submission to the Taupō District Council

April 2023

**FURTHER SUBMISSIONS THAT ARE IN SUPPORT OF, OR IN OPPOSITION TO,
SUBMISSIONS ON THE OTAGO REGIONAL POLICY STATEMENT – FRESHWATER INSTRUMENT
UNDER CLAUSE 8 OF THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991**


1. **Name of submitter:** Manawa Energy Limited (Manawa Energy)
2. This is a Further Submission on the **Taupō District Council District Plan Changes 38 & 42**
3. **Manawa Energy could not** gain an advantage in trade competition through this submission.
4. Further submission from Manawa Energy is as follows and contains:
 - the particular parts of the original submission (as derived from the summary of submissions) that Manawa has submitted on;
 - reasons for the submission; and
 - the decision sought.
5. **Aa a generator and supplier of electricity, Manawa Energy** has an interest in the proposal that is greater than the interest in the general public.
6. **Manawa Energy does wish** to be heard in support of this submission.
7. If others make a similar submission, **Manawa Energy will** consider presenting a joint case with them at a hearing.
8. Submitter Details:

Address for service: Manawa Energy Limited
Private Bag 12055
TAURANGA 3143
Attention: James Ryan

Phone: 027 234 0396

Email: james.ryan@manawaenergy.co.nz

Signature:



For, and on behalf of, Manawa Energy Limited

Dated: 04 April 2023

Manawa Energy's Further Submissions

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Plan Change 38 – Strategic Directions				
NZ Pork Industry Board – Hannah Ritchie				
2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai - OS22.17	Amend Objective 2.2.2(1) to an objective that corresponds to the function, powers and duties of the territorial authority.	Proposed Objective 2.2.2(1) appears to extend the matters TDC would consider to include water quality from a discharge perspective which creates confusion between the function, powers and duties of the territorial authority from the regional council.	Support	Manawa Energy supports this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.
Strategic Directions > 2.2.3 Policy - OS22.18	Explain in the strategic direction what benefits the district plan seeks to achieve for water quality within the function, powers and duties of the territorial authority.	In the absence of being able to review a comprehensive planning response (rather than sectional plan changes) the policy cannot be understood.	Support	Manawa Energy supports this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.
Strategic Directions > 2.2.3 Policy - OS22.19	Amend Policy 2.2.3(5) to a policy that corresponds to the function, powers and duties of the territorial authority.	NZ Pork does not support duplication of land use and discharge management requirements between regional and district plans to manage freshwater quality.	Support	Manawa Energy supports this submission.
Chapter 2 Strategic Directions - OS22.23	Create a new strategic direction, objectives and policies to outline the key strategic and significant resource management issues for the rural environments within the	Create a new strategic direction, objectives and policies to outline the key strategic and significant resource management issues for the rural environments within the district. The	Oppose in part	Manawa in part opposes this submission as renewable electricity generation has a functional and operational need to be in the rural

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>district.</p> <p><u>Social and Economic Wellbeing Taupo's rural environment contributes positively to the districts economic and social wellbeing. Productive capacity Rural land remains available for primary production activities and productive capacity is protected. Reverse Sensitivity Reverse sensitivity effects are managed so as not to constraint primary production activities Rural lifestyle Opportunities for rural lifestyle subdivision and development are only provided in parts of the rural environment where they do not conflict with enabling primary production and protecting the productive potential of land.</u></p>	<p>rural environment is the largest by area within the district. Not acknowledging or defining the key issues for the zone within the strategic objectives downplays the importance of the rural environments to the district.</p>		<p>environment and therefore cannot be excluded.</p>
Horticulture NZ – Sarah Cameron				
<p>Strategic Directions - OS26.59</p>	<p>Add to chapter 38: <u>SD – RE-01 Primary production activities are recognised and provided for to enable them to operate efficiently and effectively to ensure the contribution for the economic and social wellbeing of the district and not be</u></p>	<p>Add new strategic direction for rural environment.</p>	<p>Oppose in part</p>	<p>Manawa in part opposes this submission as renewable electricity generation has a functional and operational need to be in the rural environment and therefore cannot be excluded.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p><u>compromised by inappropriate subdivision, use and development</u> <u>SD – RE – 02</u> <u>Protection of highly productive land from inappropriate development to ensure its production potential for generations to come.</u></p>			
2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai - OS26.60	Delete 2.2 strategic direction freshwater quality / te mana o te wai.	Council has no jurisdiction over the matters raised in 2.2.	Support	Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.
Waikato Regional Council – Joao Paulo				
2.5 Strategic Direction 5 Significant and Local Infrastructure - OS29.10	Amend wording by changing the percentage from 20% to 27% and providing wording that recognises the local and national importance of Taupo's electricity-producing capability.	The District Plan should explicitly recognise the importance of the district's electricity-generating capacity to the local and national economy.	Support	Manawa Energy supports this submission.
Tuakairangi Trust – Chris Marshall				
2.4 Strategic Direction 4 Climate Change -	Submitter suggests a toll is imposed on private vehicle use and	Submitter questions how higher emissions from increased vehicle	Oppose	Manawa Energy opposes this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
OS46.6	this used to subsidise public transport.	movement will result in positive climate outcomes.		
2.4.3 Policy - OS46.8	Submitter suggests that 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.	Submitter states any subdivision/development that does not offset emissions by tree planting or buying carbon credits will not result in positive climate change outcomes.	Oppose	Manawa Energy opposes this submission.
2.4.3 Policy - OS46.9	Avoid subdivision and development in natural ephemeral waterways, wetlands or LIAs.	Subdivision and land use development that encroaches on natural ephemeral waterways, wetlands or LIAs that are prone to erosion will not be resilient to climate change.	Oppose	Manawa Energy opposes this submission.
Pukawa D2 Trust – Joan Forret				
Strategic Directions - OS58.1	The following chapter provides an outline of the key strategic and significant resource management matters for the Taupo district. This chapter includes objectives and policies to guide decision making at a strategic level. <u>The order of the Strategic Directions reflects the status and importance of each Direction and its objectives and policies.</u>	Clear understanding of the legal status of the directions is required to assist planners when making assessments against the district plan. To assist with the importance and status of each direction, a hierarchy should be established.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>The strategic objectives set the direction for the District Plan and help to implement the Council's community outcomes for <u>resource management practices</u>. They are indicative of the matters which are important to the Taupo District community and Council and reflect the intended outcomes to be achieved through the implementation of the District Plan.</p> <p>... requirement to consider District Plan policy. <u>The strategic directions must be considered in all resource consent applications and plan changes.</u> ...</p>			
2.1 Strategic Direction 1 Tangata Whenua - OS58.6	<p>Recognise that <u>iwi management plans are higher order statutory documents</u> in decision making, and the importance of iwi environmental management plans in providing important guidance and direction on the sustainable use and development of the environment and natural resources.</p>	<p>Amend to make it clear that the iwi management plan takes precedence over the district plan. "Higher order statutory documents" is the terminology used in the section 32 report.</p>	Oppose	<p>Manawa Energy opposes this submission. Iwi settlement acts do not provide for a higher order status and iwi documents are only provided for in District planning.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
2.6 Strategic Direction 6 Natural Environment Values - OS58.9	The protection of the natural values of areas of significant indigenous vegetation and significant habitats of indigenous fauna from the adverse effects of inappropriate development, including through offsetting to result in a net environmental gain.	Offsetting is a recognised tool.	Oppose	Manawa Energy opposes this submission requiring offsetting to be a net gain.
2.6 Strategic Direction 6 Natural Environment Values - OS58.14	Protect the natural values of areas of significant indigenous vegetation and significant habitats of indigenous fauna from land use and development activities that will have more than minor adverse effects on the ecological values that cannot be offset. and processes important to those areas.	Restrictions have been placed by Council over Maori land tenure, which resulted in present vegetation growing over land that was always used as gardens. Offsetting should be available as a tool to achieve a net environmental gain.	Oppose	Manawa Energy opposes this submission, renewable electricity generation has a functional and operational need to be in areas on SNA as that is the location of the energy resource.
2.6 Strategic Direction 6 Natural Environment Values - OS58.16	5. Encourage the protection, enhancement and restoration of natural and landscape value areas, including by Supporting opportunities for tangata whenua to exercise their customary responsibilities as mana whenua and kaitiaki in restoring, protecting and enhancing these areas.	Support in part - Policy 2.6.3.5. Allow tangata whenua to decide what is best for their land.	Oppose	Manawa Energy opposes this submission, renewable electricity generation has a functional and operational need to be in areas on SNA if that is the location of the energy resource.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Ngati Tahu-Ngati Whaoa Runanga Trust – Michelle Phillips				
2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai - OS66.2	Recognise the National Policy Statement for Freshwater Management (NPS-FM) which contains the principles of Te Mana o te Wai.	Submitter seeks amendment to provide context for the relevance and importance of Te Mana o te Wai.	Oppose	Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.
Mercury – Hayley Stronge				
2.1.3 Policy - OS68.1	Retain policies 2.1.3(1) to 2.1.3(9) other than Policy 2.1.3(6) which should be deleted. Amend policies as shown below: 2.1.3 Policies 1. Recognise and provide for the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, wahi tapu (sacred sites), and other taonga (treasures). ... 6. Enable development of Maori Land within the provisions of the plan for the purposes of fulfilling the economic and social aspirations of those owners. ...	Mercury supports all policies in 2.1.3 and Policy 2.1.3(2) in particular. This objective is consistent with the Matters of National Importance of the RMA and is appropriate in the context of supporting joint venture partnerships for several renewable electricity generation sites in the Taupo District. Mercury is of the view that policy 2.1.3(6) should be deleted as it duplicates Policy 2.1.3(2).	Support	Manawa Energy supports this submission.
2.2.2 Objective – OS68.2	Retain 2.2.2 Objective in same or similar form	This objective is consistent with the sustainable management purpose of	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
		the RMA and is appropriate in the context of the issues facing Taupo District.		
2.3.2 Objectives - OS68.3	<p>Amend Objective 2.3.2(3) and add new Objective 2.3.2(8) as below:</p> <p>3. Subdivision, use and development of land <u>in appropriate locations</u> which will have demonstrable social and cultural benefits to the District's community will be supported.</p> <p><u>8. The East Taupo Arterial will continue to act as an 'urban fence' separating urban activities to the west from industrial and rural activities to the east including renewable electricity generation activities.</u></p>	An important aspect of the urban form of Taupo is the East Taupo Arterial being an 'urban fence' separating urban activities to the west (particularly residential activities) from industrial and rural activities to the east including renewable electricity generation activities. It is important to reinforce this as an enduring objective in the District Plan.	Support	Manawa Energy supports this submission.
2.3.3 Policy - OS68.4	<p>Amend Policy 2.3.3(10) to read as follows:</p> <p>10. Manage subdivision use and development of land to ensure that it will not:</p> <p>a. ...</p> <p>b. unduly conflict with existing activities on adjoining properties <u>and the surrounding areas, ...</u></p>	Conflicts need to be avoided with activities in the wider surrounding environment, not just on adjoining properties. Reverse sensitivity effects do not arise from "existing uses". They arise from new or expanded sensitive activities locating in proximity to existing uses.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	d. give rise to reverse sensitivity effects from existing uses			
2.4 Strategic Direction 4 Climate Change - OS68.5	<p>Amend the introductory part of section 2.4 (STRATEGIC DIRECTION 4 CLIMATE CHANGE) as follows: Climate change has been identified as an issue which is important <u>globally and</u> within the Taupo District. ... It is important that the District and its communities are able to adapt to the effects of climate change to be resilient and safe....</p> <p>1. Effects on climate change – which refers to activities that may lead to an increase in greenhouse gasses and those which may result in a reduction of greenhouse gasses from discharged to the atmosphere or help to facilitate efforts towards decarbonisation, <u>including the electrification of home heating, transport and industry.</u></p> <p>2.</p> <p>...Supporting positive climate change outcomes and ensuring that the effects of climate change are recognised and provided for will assist in planning for a district which <u>helps avoid</u>, does not</p>	<p>Mercury strongly supports section 2.4 (climate change) and requests only minor amendments. Taupo District provides up to 20% of New Zealand's electricity supply, with more than 20 renewable electricity power stations mostly located in the Rural Environment. It is therefore one of the most significant land uses in the Taupo District.</p> <p>The importance of renewable electricity generation needs to be recognised and provided for in the Taupo District Plan, particularly within this section that sets out how climate change is to be addressed within the Taupo District. In that regard, the first priority should be to support activities that will help avoid climate change occurring in the first place. High on that list is renewable electricity generation.</p>	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	contribute to, and is resilient to, climate change...			
2.4.2 Objective - OS68.6	Retain objectives, 2.4.2(1), 2.4.2(2) and 2.4.2(3). In addition, add new objective 2.4.2(4) that reads: <u>4. An increase in the amount of electricity generated from renewable sources within the Taupo District to assist with the decarbonisation of the economy.</u>	Objectives 2.4.2(1), 2.4.2(2) and 2.4.2(3) are important for addressing the issues facing Taupo District, Aotearoa New Zealand and the world. In addition, a new objective needs to clearly articulate the necessity of increased renewable electricity generation to assist with the decarbonisation of the economy. This decarbonisation is essential for the country to achieve its international GHG reduction targets that it has committed to achieve.	Support	Manawa Energy supports this submission.
2.4.3 Policy - OS68.7	Retain policies 2.4.3(1). Delete policy 2.4.3(3) and policy 2.4.3(4). In addition, add new policies 2.4.3(2) and 2.4.3(3) as below and renumber proposed policy 2.4.3.(2) to policy 2.4.3.(4) with a minor amendment as below. 1.... 2. Land use activities which will unduly accelerate the effects of climate change will be discouraged. 3. Urban and built development must be designed in a manner which considers the need to reduce	Policies need to be included which specifically provide for and enable activities that will help address climate change.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>greenhouse gas emissions associated with that development and resulting land use.</p> <p><u>2. Recognise and provide for the use and development of the District's renewable energy resources to facilitate decarbonization of the economy, including a reduction in greenhouse gas emissions, increased electricity generation capacity, improved security of supply and transmission.</u></p> <p><u>3. Enable the upgrading and maintenance of existing and new renewable electricity generation activities and transmission, including where contributing to one of the following;</u></p> <ul style="list-style-type: none"> · <u>adaptation required to mitigate risks from climate change</u> <u>or</u> · <u>provides for increased electricity output, or greater efficiency</u> · <u>continued safe, efficient and secure operation.</u> <p><u>24. Land use activities which will unduly accelerate the effects of climate change will be discouraged.</u></p>			

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
2.5 Strategic Direction 5 Significant and Local Infrastructure - OS68.8	<p>Amend the introductory part of section 2.5 as follows:</p> <p>Infrastructure, ..., such as the three waters network, transport, communications, energy <u>electricity</u> generation, transmission and distribution networks, and any other network utilities undertaken by network utility operators.</p> <p>....However, inappropriately located or designed land use activities can adversely affect the safe and effective functioning of significant and locally important infrastructure <u>and the natural resources on which they rely on to operate.</u></p> <p>The Taupo District plays an important role in the location and provision of nationally 'significant infrastructure'. Its central location and natural resources means that Taupo is home to:</p> <ul style="list-style-type: none"> · ... · renewable electricity generation facilities that connect with the national grid, <u>that provide</u> electricity to meet up to 20% of New Zealand's total electricity demand... <p>In addition to nationally and regionally significant infrastructure, local roads and other infrastructure ... is vital for the ongoing</p>	<p>The introduction should more accurately refer to "electricity generation", not "energy generation". Renewable electricity generation activities is regionally significant whether or not it is connected to the national grid.</p>	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	functioning of the District District's urban and rural communities.			
2.5.2 Objectives - OS68.9	<p>Retain the following Objectives, subject to minor amendments to Objective 2.5.2(1) and 2.5.2(2) as follows:</p> <p>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 <u>and protected</u> in decision making and land use planning.</p> <p>2. The local and national benefits of the sustainable development, operation, maintenance and upgrading of electricity transmission and renewable electricity generation resources and activities are recognised and <u>encouraged achieved</u>.</p> <p>...</p>	Mercury supports all the objectives in 2.5.2 as infrastructure at all levels (locally, regionally and nationally significant infrastructure) is critical for the effective functioning and social and economic wellbeing of our communities. Minor additions are suggested to strengthen the objectives.	Support	Manawa Energy supports this submission.
2.5.3 Policy - OS68.10	Retain the following policies, subject to minor amendments to Policy 2.5.3(1) and 2.5.3(2) as follows:	Mercury supports all the policies in 2.5.3 as infrastructure at all levels (locally, regionally and nationally significant infrastructure) is critical for	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>2.5.3 Policies</p> <p>1. Recognise and provide for the national, regional and local benefits of renewable energy <u>electricity</u> generation activities and resources, and transmission activities, in relation to climate change, security of supply, and social, and economic wellbeing of people and communities and for their health and safety.</p> <p>2. Recognise <u>and provide for</u> the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure.</p> <p>...</p>	<p>the effective functioning and social and economic wellbeing of our communities. The policies are appropriate ways of achieving the objectives in 2.5.2. The submitter seeks minor amendments to strengthen/clarify the policies.</p>		
2.6.3 Policy - OS68.11	<p>Add the following new policy 2.6.3(7) as follows:</p> <p><u>7. Recognise the benefits of offset measures and compensation and provide for their use as feasible alternatives to manage significant residual adverse effects of renewable electricity generation activities and regionally significant infrastructure.</u></p>	<p>Mercury supports the addition of one additional policy which covers an increasingly important aspect of consenting renewable electricity generation activities.</p>	Support	<p>Manawa Energy supports this submission.</p>
Genesis Energy – Alice Lin				

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
2.3.2 Objectives - OS84.1	Retain with amendment as shown below. 3. Subdivision, use and development of land <u>in appropriate locations</u> which will have demonstrable social and cultural benefits to the District's community will be supported.	Genesis generally supports the proposed objectives. A minor edit is suggested to provide clarity.	Support	Manawa Energy supports this submission.
2.3.3 Policy - OS84.2	Retain provisions subject to amendments below 5. Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure (including development and of additional infrastructure),... 10. Manage subdivision use and development of land to ensure that it will not: a.... b. unduly conflict with existing activities on adjoining properties <u>and the surrounding areas</u> . c.... d. give rise to reverse sensitivity effects from existing uses	Genesis generally supports the proposed policies. However, in respect of Policy 10, Genesis considers conflicts need to be avoided with activities in the wider surrounding environment, not just on adjoining properties. In addition, reverse sensitivity effects do not arise from "existing uses" – they arise from new or expanded sensitive activities locating in proximity to existing uses. Suggested changes are therefore made to accurately reflect the intent of Policy 10.	Support	Manawa Energy supports this submission.
2.4 Strategic Direction 4 Climate Change -	Climate change is one the most significant issues facing the entire planet. As noted in section 2.5 Strategic Direction 5 Significant and	Genesis consider the importance of renewable electricity generation needs to be appropriately recognised and provided for in the Taupo District	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
OS84.3	<p>Local Infrastructure, the Taupo District provides up to 20% of New Zealand's electricity supply. There are more than 20 renewable electricity power stations in the Taupo District, mostly located in the Rural Environment. It is therefore one of the most significant land uses in the Taupo District.</p> <p>Genesis consider the importance of renewable electricity generation needs to be appropriately recognised and provided for in the Taupo District Plan, particularly within this section that sets out how climate change is to be addressed within the Taupo District. In that regard, the first priority should be to support activities that will help avoid climate change occurring in the first place. High on that list is renewable electricity generation.</p> <p>The minor changes are therefore suggested to strengthen the overview statement leading to the objectives and policies in this section.</p>	<p>Plan, particularly within this section that sets out how climate change is to be addressed within the Taupo District. In that regard, the first priority should be to support activities that will help avoid climate change occurring in the first place. High on that list is renewable electricity generation. The minor changes are therefore suggested to strengthen the overview statement leading to the objectives and policies in this section.</p>		

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
2.4.2 Objective - OS84.4	Genesis supports the proposed directions for community resilience and adaptation to the effects of climate change. However, with the serious implications of climate change being increasingly experienced across New Zealand, Genesis considers explicit references for direct actions are required in conjunction with objectives that build resilience and adaptation. Genesis considers a new objective should be included that explicitly recognises the increasing contribution renewable electricity generation in the District has on reducing greenhouse gas emissions and mitigating the potential effects of climate change.	Genesis supports the proposed directions for community resilience and adaptation to the effects of climate change. However, with the serious implications of climate change being increasingly experienced across New Zealand, Genesis considers explicit references for direct actions are required in conjunction with objectives that build resilience and adaptation. Genesis considers a new objective should be included that explicitly recognises the increasing contribution renewable electricity generation in the District has on reducing greenhouse gas emissions and mitigating the potential effects of climate change.	Support	Manawa Energy supports this submission.
2.4.3 Policy - OS84.5	Retain 2.4.3 Policy subject to amendments below. 2.4.3 Policies 1.... 2. <u>Recognise and provide for the use and development of the District's renewable energy resources to facilitate decarbonisation of the economy, including a reduction in greenhouse gas emissions, increased electricity generation</u>	As outlined in 2.4.2 Objective above, Genesis considers two new policies need to be included which specifically provide for and enable activities that will help address climate change.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p><u>capacity and improved security of supply including transmission.</u></p> <p><u>3. Enable the upgrading and maintenance of existing and the development of new renewable electricity generation activities, including where contributing to one of the following:</u></p> <ul style="list-style-type: none"> · <u>adaptation required to mitigate risks from climate change</u> · <u>provides for more electricity output, or greater efficiency</u> · <u>continued safe, efficient and secure operation.</u> <p><u>24. Land use activities which will unduly accelerate the effects of climate change will be discouraged.</u></p> <p><u>35....</u></p> <p><u>46. Subdivision, use and development of land...</u></p>			
2.5 Strategic Direction 5 Significant and Local Infrastructure - OS84.6	<p>Retain 2.5 overview statement subject to amendments below.</p> <p>2.5 STRATEGIC DIRECTION 5 SIGNIFICANT AND LOCAL INFRASTRUCTURE</p> <p>Infrastructure, ..., transport, communications, energy <u>electricity</u> generation, transmission and distribution networks, and any other network utilities undertaken by network utility operators.</p>	<p>Genesis generally supports the proposed overview statement which identifies the range of infrastructure important within the District. Minor changes are however suggested to provide clarity and accuracy. In particular, Genesis considers "energy generation" should be more accurately referenced as "electricity generation". In addition, as "significant infrastructure" is not (and</p>	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>...However, inappropriately located or designed land use activities can adversely affect the safe and effective functioning of significant and locally important infrastructure <u>and the natural resources on which they rely on to operate.</u></p> <p>...Taupo is home to:</p> <ul style="list-style-type: none"> · ... · renewable electricity generation facilities that connect with the national grid, accounting for up to 20% of New Zealand's total electricity demand · ... <p>In addition to nationally and regionally significant infrastructure, local roads and other infrastructure (including development and additional infrastructure) is vital for the ongoing functioning of the Districts District's urban and rural communities.</p>	<p>should not be) a defined term, Genesis considers the quotation marks should be removed to avoid confusion.</p>		
2.5.2 Objectives - OS84.7	<p>Retain 2.5.2 Objectives subject to amendments below.</p> <p>2.5.2 Objectives</p> <p>1. The wider benefits and strategic importance of nationally and regionally significant infrastructure to the District and wider, including the economic, cultural and social</p>	<p>Genesis supports 2.5.2 Objectives which appropriately recognises the strategic importance and benefits of infrastructure, including electricity infrastructure. Minor changes are suggested to strengthen the objectives.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>wellbeing of people and communities and for their health and safety, are recognised <u>and protected</u> in decision making and land use planning.</p> <p>2. The local and national benefits of the sustainable development, operation, maintenance and upgrading of electricity transmission and renewable electricity generation resources and activities are recognised and <u>encouraged achieved</u>.</p> <p>3....</p>			
2.5.3 Policy - OS84.8	<p>Retain 2.5.3 Policy subject to amendments below.</p> <p>Amend to read as follows:</p> <p>2.5.3 Policiesy</p> <p>1. Recognise and provide for the national, regional and local benefits of renewable energy<u>electricity</u> generation activities...</p> <p>2. Recognise <u>and provide for</u> the functional and operational needs....</p>	<p>Genesis generally supports the proposed policies; however, minor changes are suggested to strengthen the provisions and to provide clarity and accuracy as outlined elsewhere in Genesis' submission.</p>	Support	<p>Manawa Energy supports this submission.</p>
2.6.2 Objectives - OS84.9	<p>Retain 2.6.2 Objectives with amendments below.</p> <p>2.6.2 Objectives</p> <p>1. Recognise the importance of the districts <u>District's</u> natural values and</p>	<p>Genesis generally supports the proposed objectives. Minor changes are suggested for accuracy.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>landscapes and their significance to the Taupo Districts District's communities and identity.</p> <p>2....</p> <p>4. Recognition of the extent of indigenous vegetation and habitat under on Maori land tenure, and the need to provide for the important relationship of Maori and their culture and traditions with their ancestral lands and waaahi tapu....</p>			
2.6.3 Policy - OS84.10	<p>Retain 2.6.3 Policy subject to new clause 7 shown below:</p> <p><u>7. Recognise the benefits of offset measures and compensation and provide for their use as feasible alternatives to manage significant residual adverse effects of renewable electricity generation activities and Regionally Significant Infrastructure.</u></p>	<p>Genesis generally supports the proposed policies. However, in addition to minor changes suggested for accuracy, Genesis considers the potential benefits provided by offset measures and compensation should be explicitly provided for, particularly when considered against development and activities that have a wider benefit (e.g. regional, national and global) such as renewable electricity generation activities and Regionally Significant Infrastructure.</p>	Support	Manawa Energy supports this submission.
Strategic Directions - OS84.47	<p>Include an Energy Chapter in the Taupo District Plan in accordance with the National Planning Standards, either as a result of Plan</p>	<p>Genesis seeks the inclusion of an Energy Chapter in the Taupo District Plan in accordance with the National Planning Standards, either as a result</p>	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	Change 38 or by way of a subsequent Proposed Plan Change in the near future.	of Plan Change 38 or by way of a subsequent Proposed Plan Change in the near future. There are more than 20 power stations in the Taupo District making renewable electricity generation one of the most significant activities in the Taupo District.		
DOC – Ashiley Sycamore				
Strategic Directions - OS89.1	<p>The Council should undertake a review of the NPS-IB exposure draft (or the soon to be gazetted NPS-IB document) to confirm Proposed Plan Change 38 is giving effect to this national direction. The Strategic Directions chapter should be updated to give effect to the NPS-IB where required.</p> <p>Any other amendments that may be necessary or appropriate to address my concerns.</p>	<p>The NPS-IB currently has no legal effect; however, it is expected to come into effect in December 2022 prior to the further submission and hearing process of Plan Change 38. The Director-General considers it would be effective and efficient to align the review of the Plan Change 38 provisions with the policy direction and requirements anticipated under the NPS-IB, to avoid an additional plan change.</p>	Oppose	<p>Manawa Energy opposes this submission as there will be a separate process and timeframes for the District Council to implement this NPS-IB if and when it comes into effect.</p>
2.1 Strategic Direction 1 Tangata Whenua - OS89.3	<p>Retain as notified, unless iwi/hapu/whanau request specific changes.</p> <p>Note: There are spelling errors in this section that should be</p>	<p>The Director-General generally supports the tangata whenua section, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	corrected prior to Plan Change 38 becoming operative e.g. "the Te Tirirti o Waitangi" should be corrected to "Te Tiriti o Waitangi"; "mautaranga" should be corrected to "matauranga".	wording of the chapter. The provisions are consistent with Part 2 of the RMA and wider planning documents.		
2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai - OS89.4	Retain as notified, unless iwi/hapu/whanau request specific changes.	The Director-General generally supports the freshwater quality/Te Mana o te Wai section, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the cultural objectives and policies within this section. The provisions give effect to the NPS-FM and wider planning documents.	Oppose	Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.
Federated Farmers – Colin Guyton				
2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai - OS91.3	(a) the amendment of strategic direction 2 Freshwater Quality / Te Mana o te Wai to achieve consistency with the requirement of the National Objectives Framework; and (b) any consequential amendments required as a result of the relief sought.	The proposed strategic direction for freshwater needs to be rewritten to ensure that it achieves consistency with the National Objectives Framework and clearly sets out the defined process that the framework has defined. It is essential that the strategic direction supports the national direction that has been set by central government.	Oppose	Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
2.4 Strategic Direction 4 Climate Change - OS91.5	<p>(a) the amendment of Policy 2.4.3 as currently written to read as below or with wording to similar effect;</p> <p>2. Land use activities which will <u>unduly overly</u> accelerate the effects of climate change will be discouraged <u>recognising that some land use activities will be able to continue with no significant changes to their emissions output.</u></p> <p>(b) and any consequential amendments required as a result of the relief sought.</p>	<p>Federated Farmers supports the inclusion of a strategic direction that deals with climate change and how important it is to ensure that communities need to become climate change resilience.</p> <p>Policy 2.4.3(2) is not supported as it is currently written. There should be an acknowledgement that some land use activities have a functional need for occurring and that some may not be able to achieve a positive climate change outcome but are also not increasing their emissions into the environment.</p>	Support	Manawa Energy supports this submission.
2.5 Strategic Direction 5 Significant and Local Infrastructure - OS91.6	<p>(a) the addition to Policy 2.5.3 of a new clause to read as below or with wording to similar effect;</p> <p><u>6. To recognise the reverse sensitivity effects infrastructure may have on existing land use activities and to avoid, remedy or mitigate these effects where possible.</u></p> <p>(b) and any consequential amendments required as a result of the relief sought.</p>	<p>Federated Farmers supports strategic direction 5 as it is currently drafted including the objectives and policies. However, we seek an amendment to the policies so that it is acknowledged that infrastructure can (and does) have reverse sensitivity effects on existing land use activities such as farming and primary production.</p>	Oppose	Manawa Energy opposes this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
2.6 Strategic Direction 6 Natural Environment Values - OS91.7	(a) the amendment of strategic direction 6 Natural Environment Values to recognise and provide for non-regulatory methods as well as the role that private landowners play in the preservation of natural environment values; and (b) any consequential amendments required as a result of the relief sought.	There are concerns that the proposed objectives and policies do not provide for existing activities to continue. There needs to be an additional objective and policy that recognises and provides for existing activities such as grazing and other farming activities to continue if the scale and intensity of effects do not / have not increased following the commencement date of the plan. Federated Farmers supports the use of non-regulatory measures to assist landowners to continue this journey. The Council needs to be prepared to function as an intermediary so that effective partnerships can be established between all the parties involved with the protection of indigenous vegetation and fauna and natural values and landscapes to ensure the best possible outcomes.	Support	Manawa Energy supports this submission.
Contact Energy – Mark Chrisp				
Strategic Directions - OS93.2	Amend the introduction to Chapter 2 Strategic Directions to read as follows: Chapter 2 Strategic Directions The following chapter provides an outline of the key strategic and	Submitter seeks correction of typos.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>significant resource management matters for the Taupo dDistrict. This chapter includes objectives and policies to guide decision making at a strategic level...</p> <p>The key strategic or significant resource management matters for the district for the Taupo District are:</p> <p>1. Tangata Whenua...</p>			
2.1 Strategic Direction 1 Tangata Whenua - OS93.3	<p>Amend to read as follows: 2.1 STRATEGIC DIRECTION 1 TANGATA WHENUA</p> <p>The Council, through the District Plan, is required to take into account the Pprinciples of the te Tirirti o Waitangi. This is to be done at all levels of planning and decision making under the Plan....</p> <p>The dDistrict pPlan has an important role to play in supporting mana whenua in achieving these aspirations.</p> <p>The Council is also required to, in partnership with mana whenua, recognise and provide for the mMaori values in resource management and decision making. These include the important relationship of mMaori and their culture and traditions with their</p>	Submitter seeks correction of typos.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	ancestral lands, water, sites, waahi tapu and other taonga and to have particular regard to kaitiakitanga. This is to happen not just through recognition and incorporation of these matters into the p Plan but also the wider decision making and plan implementation process...			
2.1.2 Objective - OS93.4	Amend to read as follows: 2.1.2 Objectives 1. ... 3. Resource management planning and decision making reflects tikanga, mana whakahaere, kaitiakitanga, manaakitanga, whakapapa, mautaranga M Maori and te whanake....	Submitter seeks correction of typos.	Support	Manawa Energy supports this submission.
2.1.3 Policy - OS93.5	Amend to read as follows: 2.1.3 Policies 1.... 5. Recognise the wider constraints on the utilisation and development of M Maori land as different from land in freehold title....	Submitter seeks correction of typos.	Support	Manawa Energy supports this submission.
2.2 Strategic Direction 2 Freshwater Quality /	Amend to read as follows: 2.2 STRATEGIC DIRECTION 2 FRESHWATER QUALITY / TE MANA	Submitter seeks correction of typos.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Te Mana O Te Wai - OS93.6	<p>O TE WAI</p> <p>... The Taupo District Plan has a responsibility role to assist with to <u>responsibility role to assist with</u> the management of the adverse effects on the environment that may arise from subdivision and land use in the District. Managing the adverse effects on waterways resulting from subdivision and land use forms part of that responsibility and there are clear benefits from doing this. The state of the Districts freshwater resources is of significant interest to the Taupo District community, and it is important that positive freshwater outcomes are achieved through the application <u>implementation</u> of the Plan.</p>			
2.3 Strategic Direction 3 Urban Form and Development - OS93.7	<p>2.3 STRATEGIC DIRECTION 3 URBAN FORM AND DEVELOPMENT</p> <p>The Taupo District <u>District's</u> diverse and growing population has led to increased demand for housing and demand for new commercial and industrial areas...The District Plan provides a framework for ensuring that urban development, subdivision and changes in land use occurs in a planned and efficient manner and is adequately</p>	Submitter seeks correction of typos.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>serviced by infrastructure (including development and of additional infrastructure).</p> <p>...This approach reflects the an efficient and effective urban form which will develop in a manner that is appropriately serviced by infrastructure reflects the important values and communities within the District...</p>			
2.3.2 Objectives - OS93.8	<p>2.3.2 Objectives</p> <p>1...</p> <p>3. Subdivision, use and development of land <u>in appropriate locations</u> which will have demonstrable social and cultural benefits to the District's community will be supported.</p> <p>4....</p> <p>5. The Town Centre Environment is strengthened and reinforced as the primary commercial, retail, recreational, cultural and entertainment centres for Taupo District.</p> <p>6. ...</p> <p><u>8. The East Taupo Arterial will continue to act as an 'urban fence' separating urban activities to the west from industrial and rural activities to the east including</u></p>	<p>An important aspect of the urban form of Taupo is the East Taupo Arterial being an 'urban fence' separating urban activities to the west (particularly residential activities) from industrial and rural activities to the east including renewable electricity generation activities. It is important to reinforce this as an enduring objective in the District Plan. The ability to utilise the Wairakei-Tauhara Geothermal System for renewable electricity generation purposes, unfettered by the establishment of compatible urban activities, is recognised as a matter of both regional and national significance in the Waikato Regional Policy Statement (RPS) and the National Policy Statement for</p>		

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<u>renewable electricity generation activities.</u>	Renewable Electricity Generation (NPS-REG).		
2.3.3 Policy - OS93.9	<p>Amend to read as follows:</p> <p>2.3.3 Policiesy</p> <p>1...</p> <p>5. Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure (including development and of additional infrastructure), according to the capacity limitations of that infrastructure.</p> <p>6....</p> <p>7. Provide for the development of Papakainga on mMaori land to facilitate mMaori occupation on their ancestral lands.</p> <p>8....</p> <p>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 district district's pre-eminent retail, commercial and mixed-use centres.</p> <p>10. Manage subdivision use and development of land to ensure that it will not:</p> <p>a. have an adverse effect on the</p>	There are a number of typos that need to be corrected and other edits. Conflicts need to be avoided with activities in the wider surrounding environment, not just on adjoining properties. Reverse sensitivity effects do not arise from "existing uses". They arise from new or expanded sensitive activities locating in proximity to existing uses.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>functioning of the environment where it is located,</p> <p>b. unduly conflict with existing activities on adjoining properties <u>and the surrounding areas,</u></p> <p>... d. give rise to reverse sensitivity effects from existing uses</p> <p>☰</p>			
2.4 Strategic Direction 4 Climate Change- OS93.10	<p>2.4 STRATEGIC DIRECTION 4 CLIMATE CHANGE</p> <p>Climate change has been identified as an issue which is important <u>globally and</u> within the Taupo District. A warming environment, longer and drier droughts and increased intensity of storm events are anticipated. It is important that the District and its communities are able to adapt to the effects of climate change to be resilient and safe.</p> <p>For environmental management and planning purposes there are two separate, but important aspects of climate change:</p> <p>1. Effects on climate change – which refers to activities that may lead to an increase in greenhouse gasses and those which may result in a reduction of greenhouse gasses from discharged to the</p>	<p>The importance of renewable electricity generation needs to be recognised and provided for in the Taupo District Plan, particularly within this section that sets out how climate change is to be addressed within the Taupo District. In that regard, the first priority should be to support activities that will help avoid climate change occurring in the first place. High on that list is renewable electricity generation.</p>	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>atmosphere or help to facilitate efforts towards decarbonisation, <u>including the electrification of home heating, transport and industry.</u></p> <p>2....</p> <p>It is important to consider both of these aspects of climate change to effectively enable people and communities to provide for their social, economic, and cultural well-being and for their health and safety. Supporting positive climate change outcomes and ensuring that the effects of climate change are recognised and provided for will assist in planning for a district which <u>helps avoid</u>, does not contribute to, and is resilient to, climate change....</p>			
2.4.2 Objective - OS93.11	<p>2.4.2 Objectives</p> <p>1. Subdivision, use and development of land in the Taupo District will result in positive climate change outcomes.</p> <p><u>2. An increase in the amount of electricity generated from renewable sources within the Taupo District to assist with the decarbonisation of the economy.</u></p> <p>2. Subdivision, use and</p>	<p>A new objective needs to clearly articulate the desirability of increased renewable electricity generation to assist with the decarbonisation of the economy (both within the Taupo District, regionally and nationally). There are a number of typos that need to be corrected.</p>	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>development of land in the Taupo District will be resilient to the current and future effects of climate change on the District's current and future communities, including any disproportionate effects on Maori Maori.</p> <p>3. The Taupoo District is well prepared to adapt to the risks and effects from climate change, such as natural hazards.</p>			
2.4.3 Policy - OS93.12	<p>2.4.3 Policiesy</p> <p>1. Land use activities which will result in positive climate change outcomes, including through reducing greenhouse gas emissions and decarbonisation, will be supported and encouraged.</p> <p><u>2. Recognise and provide for the use and development of the District's renewable energy resources to facilitate decarbonization of the economy, including a reduction in greenhouse gas emissions, increased electricity generation capacity and improved security of supply including transmission.</u></p> <p><u>3. Enable the upgrading and maintenance of existing and development of new renewable</u></p>	<p>Policies need to be included which specifically provide for and enable activities that will help address climate change. There are a number of typos that need to be corrected.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p><u>electricity generation activities and transmission, including where contributing to one of the following:</u></p> <ul style="list-style-type: none"> · <u>adaptation required to mitigate risks from climate change</u> · <u>provides for increased electricity output, or greater efficiency</u> · <u>continued safe, efficient and secure operation.</u> <p>24. Land use activities which will unduly accelerate the effects of climate change will be discouraged.</p> <p>35....</p>			
2.5 Strategic Direction 5 Significant and Local Infrastructure - OS93.13	<p>2.5 STRATEGIC DIRECTION 5 SIGNIFICANT AND LOCAL INFRASTRUCTURE</p> <p>Infrastructure, as defined in the Resource Management Act generally encompasses physical services and facilities which enable society to function, such as the three waters network, transport, communications, energy <u>electricity</u> generation...</p> <p>...However, inappropriately located or designed land use activities can adversely affect the safe and effective functioning of significant and locally important infrastructure</p>	<p>The introduction should more accurately refer to "electricity generation" and not "energy generation". Renewable electricity generation activities is regionally significant whether or not it is connected to the national grid.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p><u>and the natural resources on which they rely on to operate.</u> ...Its central location and natural resources means that Taupo is home to:</p> <ul style="list-style-type: none"> · ... · renewable electricity generation facilities that connect with the national grid, accounting for up to 20% of New Zealand's total electricity demand <p>... In addition to nationally and regionally significant infrastructure, local roads and other infrastructure (including development and additional infrastructure) is vital for the ongoing functioning of the District District's urban and rural communities.</p>			
2.5.2 Objectives - OS93.14	<p>Retain the following Objectives: 2.5.2 Objectives 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 <u>and protected</u> in decision making and land use planning.</p>	<p>Minor additions are sought to the policies.</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>2. The local and national benefits of the sustainable development, operation, maintenance and upgrading of electricity transmission and renewable electricity generation resources and activities are recognised and encouraged <u>achieved</u>.</p> <p>3....</p>			
2.5.3 Policy - OS93.15	<p>Amend to read as follows: 2.5.3 Policiesy</p> <p>1. Recognise and provide for the national, regional and local benefits of renewable energy <u>electricity</u> generation activities and resources, and transmission activities, in relation to climate change, security of supply, and social, and economic wellbeing of people and communities and for their health and safety.</p> <p>2. Recognise <u>and provide for</u> the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure.</p> <p>3....</p>	<p>The introduction should more accurately refer to "electricity generation" and not "energy generation".</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
2.6 Strategic Direction 6 Natural Environment Values - OS93.16	<p>Amend to read as follows:</p> <p>2.6 STRATEGIC DIRECTION 6 NATURAL ENVIRONMENT VALUES</p> <p>The Taupo eDistrict is characterised by important landscapes and natural areas. ... As well as being an important part of the District <u>District's</u> identity...</p> <p>The effects of human activities such as built development, vegetation clearance and land development etc. can significantly alter the character of the environment resulting in the loss of these areas and their values....</p> <p>These areas are on a range of public (reserve, forest and national parks) and private tenure land.</p> <p>There is also a high proportion of these areas on mMaori land throughout the District which can impact the ability of mMaori landowners in undertaking development on their ancestral lands.</p>	Submitter seeks minor edits.	Support	Manawa Energy supports this submission.
2.6.2 Objectives - OS93.17	<p>2.6.2 Objectives</p> <p>1. Recognise the importance of the District <u>District's</u> natural values and landscapes and their significance to the Taupo District <u>District's</u> communities and identity.</p>	Submitter seeks minor edits.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>2....</p> <p>4. Recognition of the extent of indigenous vegetation and habitat under <u>on</u> Maori land tenure, and the need to provide for the important relationship of Maori and their culture and traditions with their ancestral lands and waahi tapu....</p>			
2.6.3 Policy - OS93.18	<p>Amend to read as follows:</p> <p>2.6.3 Policiesy</p> <p>... <u>7. Recognise the benefits of offset measures and compensation and provide for their use as feasible alternatives to manage significant residual adverse effects of renewable electricity generation activities and regionally significant infrastructure.</u></p>	<p>Minor edits are proposed and the addition of one additional policy which covers an increasingly important aspect of consenting renewable electricity generation activities.</p>	Support	<p>Manawa Energy supports this submission.</p>
2.2.2 Objective - OS93.19	<p>Retain the objective.</p>	<p>Submitter supports the Objective.</p>	Support	<p>Manawa Energy supports this submission.</p>
2.2.3 Policy - OS93.20	<p>Retain the objective.</p>	<p>Submitter supports the Objective.</p>	Support	<p>Manawa Energy supports this submission.</p>
2.2.3 Policy - OS93.21	<p>Retain the objective.</p>	<p>Submitter supports the Objective.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
LWAG – Jane Penton				
2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai - OS101.1	LWAG support '2.2 STRATEGIC DIRECTION 2 FRESHWATER QUALITY / TEMANA 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.	Oppose	Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.
2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai - OS102	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).	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.	Oppose	Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.
Kainga Ora – Gurv Singh				
2.2.2 Objective - OS104.3	The submitter seeks to insert a new objective under Freshwater Quality /Te Mana o Te Wai, as follows: <u>2.2.2(2) The health and wellbeing of the Waikato River is restored and protected so that it may sustain</u>	The submitter considers that an objective should also be included under PC38 to further support the application of Te Ture Whaimana within the District Plan.	Oppose	Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<u>abundant life and prosperous communities.</u>			
Transpower – Trudi Burney				
2.5.3 Policy - OS110.6	Retain this policy. Provide a definition for 'nationally significant infrastructure' and 'regionally significant infrastructure', and include the National Grid in both definitions.	'Nationally and regionally significant infrastructure' is not defined in the Plan. These terms need to be defined so that the application of the policy is clear.	Support	Manaw Energy supports this submission - clarification for these terms would be beneficial since there is a large amount of NSI and RSI in the region
2.5.3 Policy - OS110.7	Amend 2.5.3 Policy as follows: 3. Subdivision, land use and development will not adversely affect (including reverse sensitivity effects) <u>or compromise</u> the effective and safe functioning of infrastructure.	Transpower requests minor amendments to this policy to clarify that activities should not compromise the operation of infrastructure. Infrastructure may be compromised in other ways beyond just reverse sensitivity effects, and the policy should reflect this. It is noted Proposed Plan Change 42 contains no subdivision or earthworks rules specific to the National Grid.	Support	Manawa Energy supports this submission.
Te Kotahitanga o Ngati Tuwharetoa – George Asher				
2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai -	That Objective 2.2.2 contain an explicit primary objective reference as provided below. <u>That freshwater and water bodies be managed in accordance with the</u>	TKNT note that the objectives contained in this section do not provide explicit recognition of Te	Oppose	Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
OS115.4	<p><u>hierarchy and principles of Te Mana o te Wai:</u></p> <ol style="list-style-type: none"> 1. <u>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.</u> 2. <u>To protect freshwater ecosystems, indigenous species, and trout fisheries.</u> 3. <u>To reflect the vision and objectives of nga hapu o Tuwharetoa as contained within Te Kaupapa Kaitiaki</u> 4. ... 	<p>Mana o te Wai nor do they reflect the contents of Te Kaupapa Kaitiaki.</p>		
2.2.3 Policy - OS115.5	<ol style="list-style-type: none"> 1. <u>Manage waterbodies in a manner that enhances the health and well-being</u> of tangata 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 <u>and</u> land use planning. 3. Recognise and provide for the vision, objectives, and outcomes in Te Ara Whanui o Rangitaiki (Pathways of the Rangitaiki) and Te Kaupapa Kaitiaki documents and to 	<p>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).</p>	Oppose	<p>Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>give effect to Te Ture Whaimana o Te Awa o Waikato - the Vision and Strategy for the Waikato River....</p> <p>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, <u>springs, wetlands</u> and all other waterways.</p> <p>6. <u>Recognise and provide for</u> the relationship of tangata whenua as mana whakahaere, kaitiaki and traditional users of waterbodies is respected, enhanced and supported.</p> <p>7. <u>Manage freshwater ecosystems to ensure protection of indigenous biodiversity and trout.</u></p> <p>8. <u>Recognise that freshwater bodies provide for traditional rituals and spiritual, physical and psychological well-being and sustenance.</u></p>			
2.2.3 Policy - OS115.8	4. That the concept 'fragmented development' not be used to characterise developments on Maori land or to prohibit or constrain the customary rights of mana whenua in utilising their lands.	The following submissions are made in respect of Policy 2.3.3	Oppose in part	Manawa Energy opposes this submission as it is the Regional Council's responsibility to implement the NPS-FM 2020.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>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.</p> <p>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.</p> <p>7. That TKNT support this policy and recommend further that TDC express that the provision of Papakainga for the occupation by mana whenua on their ancestral lands is a fundamental human right.</p> <p>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/hapu/whanau within the district and beyond.</p>			

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
2.5.2 Objectives - OS115.11	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. <u>(Note that the reference to benefits is already contained in Objective 2).</u> 4. Local and national transport infrastructure located in the Taupo District <u>protects the health and well-being of te taiao, taonga tuku iho, tangata whenua and the community and</u> operates in a safe and effective manner.	TKNT submit that the additional objective(s) be included in the sub-section to enable protection of the health and well-being of iwi/hapu/whanau Maori landowners and the community and the health and well-being of te taiao and taonga tuku iho of the Taupo District and are recognised and provided for in decision-making and land use planning.	Support in part	Support in part - could include wider community to clarify the statement that it is protecting all of the Taupo community.
2.5.3 Policy - OS115.12	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.	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 need to be acknowledged.	Oppose	Manawa Energy opposes this submission as - we require a greater degree of clarification the practical menaing of te oranga o te taiao, te oranga o nga taonga tuku iho, te oranga o te tangata in Council's definitions

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2.5.3 Policy - OS115.33	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 <u>and</u> security of supply, and social, and economic wellbeing of people and communities and for their health and safety.	TKNT seeks policy 2.5.3 - 1. be modified as follows to reflect concerns.	Oppose	Manawa Energy opposes - The wording proposed does not align with the NPS-REG that states that REG has benefit for social, and economic wellbeing pf people and communities.
Plan Change 42 – Rural Environment				
NZ Defence Force – Lucy Edwards				
General Rural and Rural Lifestyle Environments - OS9.6	Include the following new policy, or words to similar effect: <u>Allow temporary activities provided that their effects are appropriately managed.</u>	The general rural and rural lifestyle environment chapters contain permitted activity rules for temporary activities, but no supporting objectives and policies.	Support	Manawa Energy supports this submission.
Douglas Wallace				
4b.4.12 Maximum Artificial Light Level - OS11.3	Amend so no artificial light to be seen	Artificial light should not be seen in rural, as artificial light is urban not rural.	Oppose	Manawa Energy opposes this submission, renewable electricity generation has a functional and operational need to be in rural areas

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
				and health and safety may require artificial light to be on.
NZ Pork Industry Board – Hannah Ritchie				
Objective 3b.2.1 Enable Primary Production - OS22.5	Include definition of primary production within the plan change.	Submitter supports this section in part, but seeks the addition of a definition for Primary Production as per the National Planning Standards.	Support	Manawa Energy supports this submission.
Objective 3b.2.5 Avoidance of reverse sensitivity - OS22.8	Submitter supports the objective but it should specifically link back to not constraining the operation of primary production. Submitter seeks amendment as follows: <u>Reverse sensitivity effects on permitted and legally established Primary Production activities within the General Rural Environment, including conflict with activities in neighboring Environments, are avoided.</u> Amend objective as follows: Reverse sensitivity effects on permitted and legally established Primary Production activities within the General Rural Environment, including conflict with activities in neighboring Environments, are avoided.	Support an objective of avoiding reverse sensitivity, but this should specifically link back to not constraining the operation of primary production activities within the environment, as this is the primary function of the zone. This should also be supported by a specific rule framework to managed defined sensitive activities.	Oppose	Manawa Energy opposes this position as there are other established and lawful activities that have a functional and operational need to be in the rural environment.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Horticulture NZ – Sarah Cameron				
Amendments to the Definitions of the Taupo District Plan Section 10 - OS26	Amend the definition of Rural Industry: Means industry or business undertaken in a rural environment 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, dairy farming and geothermal/electricity generation.	Definition doesn't align with the National Planning Standards.	Support in part	Manawa Energy in part supports this position as renewable electricity generation is not a rural industry. However, renewable electricity has a functional and operational need to be in the rural environment.
Amendments to the Definitions of the Taupo District Plan Section 10 - OS26.4	Amend to include a definition of 'ancillary rural earthworks' Ancillary rural earthworks means earthworks associated with primary production, such as: a. maintenance of drains, troughs and installation of their associated pipe networks, drilling bores and offal pits, burying of dead stock and plant waste, erosion and sediment control measures b. the burying of material infected by unwanted organisms as declared by the Ministry of	There is a need to provide for 'day-to-day' activities that are integral to productive land use in the rural zone. In HortNZ's experience, providing a definition for ancillary rural earthworks and a clear rule framework is an efficient approach.	Support in part	Manawa Energy in part supports this position as renewable electricity generation has a need for ancillary earthworks. However, renewable electricity has a functional and operational need to be in the rural environment.

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	<p><u>Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993.</u></p> <p>Note: For clarity, it is noted that cultivation is not 'defined as earthworks'.</p>			
<p>Amendments to the Definitions of the Taupo District Plan Section 10 - OS26.10</p>	<p>Include definition in consideration to National Policy Statement Highly Productive Land</p>	<p>The submitter seeks a new definition for Highly productive land consistent with the NPS for Highly Productive Land.</p>	<p>Support</p>	<p>Manawa Energy supports this position as the Taupo DC should give effect to all existing NPS documents.</p>
Mercury – Hayley Stonge				
<p>Amendments to the Definitions of the Taupo District Plan Section 10 - OS68.12</p>	<p>Amend the definition of Rural Industry as follows. Rural Industry – 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, <u>and</u> dairy farming and geothermal/electricity generation.</p>	<p>Mercury opposes the inclusion of “geothermal / electricity generation” within the definition of Rural Industry. Renewable electricity generation is an activity that has been recognised in the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG) as a matter of national significance.</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
<p>Amendments to the Definitions of the Taupo District Plan Section 10 - OS68.13</p>	<p>Insert a new definition for Renewable Electricity Generation activities as follows. Renewable Electricity Generation activities means <u>the construction, operation and maintenance of structures associated with renewable electricity generation. This includes small and community-scale distributed renewable generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.</u></p>	<p>Due to the nature of the following submissions by Mercury, two additional definitions need to be included in the Taupo District Plan. The proposed new definition of Renewable Electricity Generation activities, is the same definition as in the NPS-REG.</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>
<p>3b.1 Introduction - OS68.14</p>	<p>Amend the Introduction to Chapter 3b.1 as follows: ... General Rural Environment ...Other prime characteristics of the General Rural Environment are the diverse range of land uses including farming, horticulture, energy <u>sources</u> and plantation forestry activities, with dispersed buildings and rural roads... The purpose of separating the</p>	<p>Mercury generally supports the introductory statement but seeks minor changes to recognise the importance and functional need for renewable electricity generation to occur within the Rural Environment, its contribution to the regional economy and New Zealand's security of electricity supply. These changes also reflect the need to ensure that renewable electricity generation</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>General Rural Environment from the Rural Lifestyle Environment is to preserve the productive potential of the land <u>and other natural resources</u> within the General Rural Environment by retaining large property sizes and limiting the extent of housing provided for, yet allowing appropriate development to occur while preserving the rural character of the General Rural Environment. The creation of the General Rural Environment aims to support primary productive uses, <u>renewable electricity generation activities</u>, and rural industry, meaning an activity <u>being activities</u> that directly supports, services, or is are dependent on primary production and or <u>has</u> a locational <u>or functional</u> need to be within the General Rural Environment (rather than an urban environment).</p> <p>Primary production a Activities in the General Rural Environment will produce effects that are different from urban areas,...</p> <p>The General Rural Environment provisions seek to limit the scale of</p>	<p>activities are protected from potential reverse sensitivity effects (such as housing, visitor accommodation and lifestyle development both within the General Rural Environment and the new Rural Lifestyle Environment), and that if sensitive and incompatible activities do establish, they do not constrain the ability of renewable electricity generation activities to continue operating efficiently and effectively.</p>		

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	<p>commercial and industrial activities unless they are dependent on primary production and/or have a locational <u>functional or operational</u> need to be within the General Rural Environment....</p> <p>Rural Lifestyle Environment</p> <p>... By creating separate areas in appropriate locations within the Rural Environment, the Rural Lifestyle Environment creates areas for rural living on smaller property sizes, whilst retaining separation from the rural production <u>and other</u> activities predominating in the General Rural Environment. ... By concentrating rural residential development within the Rural Lifestyle Environment this serves to preserve the open space characteristics <u>rural character</u> and <u>the</u> productive potential of the rest of the Rural Environment, and to reduce the potential for land use conflict.</p> <p>...The Rural Lifestyle Environment areas are located closer <u>in proximity</u> to urban areas to allow for access to community facilities within the district's townships</p>			

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Objective 3b.2.1 Enable Primary Production - OS68.15	Retain Objective 3b.2.1 with amendments. Objective 3b.2.1 Enable Primary Production and the Use of Natural Resources <u>Primary production and the use of natural resources</u> are enabled by protecting the availability of the rural land <u>and other</u> resources and <u>its</u> <u>their</u> productive capability.	Mercury supports Objective 3b.2.1 with an amendment so that it covers a wider range of uses anticipated in the General Rural Environment beyond just “primary production”. In accordance with s75(3) of the RMA District objectives and policies must give effect to existing RPS objectives and policies.	Support	Manawa Energy supports this submission.
Objective 3b.2.2 Maintaining the established General Rural character - OS68.16	Amend Objective 3b.2.2 to read: Objective 3b.2.2 Maintaining the established General Rural character The established character of the General Rural Environment is maintained and the cumulative erosion of its character through incremental subdivision and development is avoided. <u>Enable a range of activities in the General Rural Environment that are compatible with rural character.</u>	Mercury is of the view that Objective 3b.2.2 is misguided and seeks to achieve the wrong outcome. Firstly, it presupposes that the established character of the General Rural Environment represents a good environmental outcome in all respects to the extent that it should be “maintained”. Secondly, an objective that seeks to maintain the “established character” is essentially seeking no change. The objective seeks to <u>avoid</u> “incremental subdivision and development” which essentially locks in the status quo and will make it difficult for any new development to occur, including new development that has been identified in other planning provision as being	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
		appropriately located in the General Rural Environment.		
Objective 3b.2.3 Rural industry - OS68.17	Retain Objective 3b.2.3. Insert a new objective following Objective 3b.2.3 as follows: Objective 3b.2.X Renewable Electricity Generation and Transmission Activities <u>Enable the development, operation, maintenance and upgrading of renewable electricity generation activities and transmission activities in the General Rural Environment.</u>	Due to its elevated status under the NPS-REG, Mercury's earlier submission point (above) seeks that the definition of Rural Industry be amended to delete any reference to electricity generation and that a new definition of Renewable Electricity Generation and Renewable Electricity Generation Activities be included in the Plan. Consistent with that request, and for the same reasons, , a new objective needs to be included in the Plan to enable renewable electricity generation activities (and transmission activities by association).	Support	Manawa Energy supports this submission.
Objective 3b.2.4 Other activities - OS68.18	Provided that new Objective 3b.2.X is added as requested above, amend Objective 3b.2.4 as follows: Objective 3b.2.4 Other activities Maori cultural activities, tourism activities, <u>and</u> visitor accommodation and renewable electricity generation and transmission activities are enabled in <u>appropriate locations within</u> the General Rural Environment.	As a consequential change to the relief sought above (inserting a new objective in relation to renewable electricity generation activities), Objective 3b.2.4 needs to be amended to remove the reference to renewable electricity generation (and transmission by association). Visitor accommodation is a sensitive activity and should only be enabled in appropriate locations within the General Rural Environment rather	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
		that enabled anywhere including in locations whereby reverse sensitivities could arise.		
Objective 3b.2.5 Avoidance of reverse sensitivity - OS68.19	Amend Objective 3b.2.5 as follows: Objective 3b.2.5 Avoidance of reverse sensitivity Reverse sensitivity effects on permitted, and legally established, <u>and/or consented</u> activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided.	Mercury supports an objective in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects. However, Mercury is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already <i>exists</i> . This is particularly concerning for Mercury. The objective needs to also cover consented activities which have yet to be constructed / undertaken.	Support	Manawa Energy supports this submission.
Objective 3b.2.6 Impacts on infrastructure - OS68.20	Amend Objective 3b.2.6 as follows: Objective 3b.2.6 Impacts on infrastructure The impacts on infrastructure arising from subdivision and development are managed <u>do not compromise the safe and efficient functioning of infrastructure</u> .	An objective (or policy) that only seeks to "manage" something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupo District Plan.	Support	Manawa Energy supports this submission.
Policy 3b.2.9 Maintaining the	Amend Policy 3b.2.9 as follows: Policy 3b.2.9 Maintaining the established Rural character	Mercury is of the view that Policy 3b.2.9 is misguided and seeks to achieve the wrong outcome. The	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
established character - OS68.21	<p>Enable activities in the Maintain the established General Rural Environment <u>that will not compromise the character of the General Rural Environment</u>, as defined by:</p> <ul style="list-style-type: none"> a) <u>Extensive pastoral farming and forestry</u> b) <u>Renewable Electricity Generation Activities</u> c) <u>Geothermal areas and activities, electricity transmission and distribution</u> ad) Large open spaces between built structures be) A mix of residential and rural industry buildings e) Noises related to production activities during the day but low levels of noise at night d) Low levels of light spill f) <u>Effects from activities including noise, vibration, dust, odour and visual effects</u> eg) Infrequent vehicle movements to and from a site fh) Limited signage that directly relates to the activity operating on the site. 	<p>policy characterises the rural environment by matters such as “limited signage” whereas the existence of more than 21 large-scale renewable electricity generation activities is a far more significant and defining aspect of the General Rural Environment in the Taupo District. The rural environment does experience significant vehicle movements, noise and light spill associated with primary production activities, renewable electricity generation and rural industry activities. Accordingly Mercury proposes some clause deletions to ensure the policy is realistic</p>		

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Policy 3b.2.10 Residential units - OS68.22	<p>Amend Policy 3b.2.10 as follows:</p> <p>Policy 3b.2.10 Residential units</p> <p>Avoid the cumulative effects of rural lifestyle development by <u>providing for these activities within the Rural Lifestyle Environment and otherwise limiting residential units within the General Rural Environment</u> that:</p> <p>a) Increase the demand for community infrastructure and services</p> <p>b) Result in the inefficient use of land or loss of future flexibility for productive uses</p> <p>c) Erode the general rural character through its density, scale and location-</p> <p>d) <u>Result in the potential to generate reverse sensitivity effects.</u></p> <p>e) <u>Constrain the ability to access or utilise renewable energy resources.</u></p>	Mercury supports Policy 3b.2.10 but it needs to be expanded to address one of the most significant adverse effects that can arise as a result of residential units being established in the General Rural Environment, that being reverse sensitivity effects. The establishment of residential units should also not constrain the ability to access or utilise renewable energy resources (which are of national significance).	Support	Manawa Energy supports this submission.
Policy 3b.2.12 Minor residential unit - OS68.23	<p>Amend Policy 3b.2.12 as follows:</p> <p>Policy 3b.2.12 Minor residential unit</p> <p>Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and to ensure that the future availability of the rural land resource will not</p>	It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment. A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	be compromised <u>and to avoid the potential for reverse sensitivity effects</u>	Environment) from the boundary with the General Rural Environment.		
Policy 3b.2.13 Avoiding reverse sensitivity - OS68.24	Amend Policy 3b.2.13 as follows: Policy 3b.2.13 Avoiding reverse sensitivity Any adverse effects generated by <u>an new</u> sensitive activity must be located and managed within the allotment so as to avoid adversely affecting <u>reverse sensitivity effects</u> on permitted, and lawfully established and/or consented neighbouring activities.	Mercury supports a policy in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects. Mercury seeks an amendment to the policy for the same reasons set out in relation to the changes sought to Objective 3b.2.5.	Support	Manawa Energy supports this submission.
Policy 3b.2.14 Commercial and industrial activity - OS68.25	Amend Policy 3b.2.14 as follows: Policy 3b.2.14 Commercial and industrial activity Limit the scale of commercial and industrial activity (<u>excluding renewable electricity generation activities</u>) to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary production <u>and other activities provided for</u> within the General Rural Environment	Because renewable electricity generation activities fall within the definition of industrial activities, they need to be excluded from the first part of the policy which seeks to limit commercial and industrial activities. Mercury supports the intent of the policy, but it needs to be widened to cover other activities (including renewable electricity generation activities) that are provided for and anticipated in the General Rural Environment beyond just primary production.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Policy 3b.2.15 Allotment size - OS68.26	Retain Policy 3b.2.15.	Mercury supports Policy 3b.2.15 on the basis that it reinforces the intension that the General Rural Environment is for larger scale productive activities (rather than rural residential opportunities)	Support	Manawa Energy supports this submission.
Objective 3b.3.1 Maintain the character of the Rural Lifestyle Environment - OS68.27	Delete Objective 3b.3.1 and replace it with the following: <u>Objective 3b.3.1 Enable Rural Residential Activities</u> <u>Zone parts of the Rural Environment as Rural Lifestyle Environment to enable and provide for rural residential activities in appropriate locations where they will not give rise to reverse sensitivity effects on the surrounding General Rural Environment or Industrial Environments.</u>	The objective should focus on enabling rural residential opportunities in appropriate locations (i.e. where they will not create reverse sensitivity effects on activities in the wider General Rural Environment or Industrial Environments). If Rural Lifestyle Environment are proposed in inappropriate locations (and no decision is made to amend that situation), it forces Mercury (and other parties) to seek to amend the rules and performance standards within the Rural Lifestyle Environment as an alternative means to avoid the creation of reverse sensitivity effects. It is preferable that only appropriate locations are zoned Rural Lifestyle Environment whereby activities occurring within those zones do not need to be constrained by way of the rules and performance standards	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Objective 3b.3.2 Avoid reverse sensitivity - OS68.28	Amend Objective 3b.3.2 as follows: Objective 3b.3.2 Avoid reverse sensitivity Adverse reverse sensitivity effects, including conflict with on permitted, and legally established <u>and/or consented</u> activities in neighbouring Environments, are avoided.	Mercury supports an objective in the Rural Lifestyle Environment chapter that seeks to avoid reverse sensitivity effects. However, Mercury is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already <i>exists</i> . This is particularly concerning for Mercury. The objective needs to also cover consented activities which have yet to be constructed / undertaken.	Support	Manawa Energy supports this submission.
Objective 3b.3.3 Commercial and industrial activities - OS68.29	Amend Objective 3b.3.3 as follows: Objective 3b.3.3 Commercial and industrial activities The establishment of commercial and industrial activities that have no functional need to locate and are incompatible with the rural residential activities occurring within the <u>Rural Lifestyle Environment</u> are avoided.	Mercury supports Objective 3b.3.3 but it needs to be more precisely drafted for accuracy and clarity.	Support	Manawa Energy supports this submission.
Objective 3b.3.4 Consolidate rural lifestyle activities - OS68.30	Retain Objective 3b.3.4.	Mercury supports the consolidation of Rural Lifestyle activities within identified and appropriately located Rural Lifestyle Environments.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Objective 3b.3.6 Impacts on community infrastructure - OS68.31	Amend Objective 3b.3.6 as follows: Objective 3b.2.6 Impacts on community infrastructure The impacts on community infrastructure arising from subdivision and development are managed <u>do not compromise the safe and efficient functioning of infrastructure.</u>	An objective (or policy) that only seeks to "manage" something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupo District Plan. The objective should apply to all infrastructure, not just community infrastructure. These amendments are considered necessary so that there is a policy which achieves Objective 3b.3.2 (avoid reverse sensitivity).		
Policy 3b.3.9 Character of the Rural Lifestyle Environment - OS68.32	Add a new point i) to Policy 3b.3.9 as follows: <u>i) An environment that is surrounded by a working rural environment including rural production, geothermal areas and renewable electricity generation activities.</u>	Mercury supports Policy 3b.3.9 but it also needs to recognise, and not have adverse effects on, the nature of the surrounding General Rural Environment.	Support	Manawa Energy supports this submission.
Policy 3b.3.10 Lot sizes and setbacks for allotments adjoining the	Retain Policy 3b.3.10	Requiring larger lot sizes and greater building setbacks for new dwellings within the Rural Lifestyle Environment are two key methods for managing	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
General Rural Environment - OS68.33		reverse sensitivity effects. Mercury therefore supports this policy on this basis. However, Mercury reiterates that these two measures alone will not always avoid the potential for reverse sensitivity effects (which is what new Objective 3b.3.2 requires), and this needs to be reflected across several policies within this sub-chapter.		
Policy 3b.3.12 Minor residential unit - OS68.34	Amend Policy 3b.3.12 as follows: Policy 3b.3.12 Minor residential unit Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and to further protect the character of the R Rural Lifestyle Environment. <u>and to avoid reverse sensitivity effects.</u>	A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment. It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.	Support	Manawa Energy supports this submission.
4b.1.1 Activities in the General Rural Environment - OS68.35	Retain Rule 4b.1.1.	Mercury supports Rule 4b.1.1 on the basis that it is consistent with the approach throughout the rest of the Plan, is effects based, and enables activities to occur that do not need to be the subject of a resource consent application process.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.1.2 Minor residential units - OS68.36	<p>Add new matter of discretion as 4b.1.2(i) as follows:</p> <p>...</p> <p>When considering activities under Rule 4b.1.2 Council restricts the exercise of its discretion to the following matters:</p> <p>a....</p> <p>f. The ability to mitigate <u>avoid</u> adverse effects, <u>including reverse sensitivity effects</u>, through the use of screening, planting, landscaping, and <u>alternative design, and/or other means including restrictive covenants.</u></p> <p>g. Proposed methods for the avoidance, remedying or mitigation of potential adverse effects, and the degree to which they would be successful</p> <p>h. The likelihood of future subdivision which results in the minor residential unit being on a separate allotment to the primary residential unit.</p> <p>i. <u>The potential to constrain access to and/or the utilisation of renewable energy sources.</u></p>	<p>Minor residential units are sensitive activities whereby their establishment needs to be controlled so as to not result in reverse sensitivity effects. An additional criterion has been added to ensure that minor residential units do not constrain access to and/or the utilisation of renewable energy sources.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.1.3 Temporary Activities - OS68.37	Retain Rule 4b.1.3.	Mercury supports this rule.	Support	Manawa Energy supports this submission.
4b.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Steamfields - OS68.38	<p>Retain Rule 4b.1.4, and amend it as follows, including new clause (ii).</p> <p>4b.1.4 Electricity Generation Core Sites, Renewable Electricity Energy Generation Activities and Geothermal Areas Steamfields</p> <p>i. Any activity involving continued operation, maintenance and minor upgrading of existing electricity generation core sites, geothermal areas steamfield, renewable energy <u>electricity</u> generation activities and associated structures and ancillary activities is a permitted activity.</p> <p>ii) <u>Activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators are a permitted activity.</u></p> <p>NOTE: For the purpose of this rule "maintenance" means: All activities associated with the protective care, and monitoring of a hydro dam, a geothermal or hydroelectric power station, geothermal steamfields and associated structures, in order to</p>	<p>Mercury supports the retention of Rule 4b.1.4 (being a continuation of the Rule in currently in the Rural Environment) with a number of minor amendments. This is the enabling rule that appropriately provides for the operation, maintenance and minor upgrading of renewable electricity generation activities in the General Rural Environment.</p> <p>The term "Geothermal Areas" has been used rather than "Geothermal Steamfields" due to Section O of the Plan identifying and mapping Geothermal Areas.</p> <p>A second clause is requested to be added to the rule on the basis of Policy G of NPS-REG.</p>	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>monitor, test and/or arrest the processes of decay, structural fatigue, erosion or dilapidation of <u>all associated structures</u> and includes maintenance of surrounds and water areas.</p> <p>NOTE: For the purpose of this rule "minor upgrading" means: Structural improvement, repair and replacement <u>or upgrade</u> of <u>components, or activities required for the continued safe and efficient operation including</u> worn or technically deficient parts of <u>any structure including</u> the powerhouse, hydro dams, separation plants, switchyards, intake, control and diversion structures, wells, pipes, tunnels, cables, other equipment and accessory buildings and structures of similar character and scale, and includes associated drilling, <u>vehicles, infrastructure, machinery</u>, testing, monitoring, earthworks and vegetation removal. Also the extension to existing Buildings and Structures, and the erection of new Buildings and Structures. up to 100m2 in area and not exceeding the maximum height standard for the Rural Environment and the erection of any aerial, antennae or</p>			

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>communication dish not exceeding 5m² in area located on top of a hydro or geothermal existing structure, subject to compliance with the Noise Performance Standard.</p>			
<p>4b.1.5 Commercial and industrial activities, and home businesses, - OS68.39</p>	<p>Amend Rule 4b.1.5 as follows:</p> <p>i....</p> <p>When considering activities under Rule 4b.1.5ii Council restricts the exercise of its discretion to the following matters:</p> <p>a. The daily vehicle movements expected to and from the allotment.</p> <p>b. The effect of the activity on the rural character of the area, having regard to visual effects and lighting effects.</p> <p>c. The effect of the activity on surrounding land uses (<u>including reverse sensitivity effects</u>) and how these effects can be managed onsite and/or mitigated...</p>	<p>Home businesses could include sensitive activities and need to avoid creating reverse sensitivity effects.</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>
<p>4b.1.7 High voltage</p>	<p>Amend Rule 4b.1.7. as follows:</p> <p>4b.1.7 Buildings and Structures in</p>	<p>Mercury supports this rule as it seeks to ensure the safe operation of</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
transmission lines - OS68.40	<p><u>proximity to High voltage transmission lines</u></p> <p>i. Any building <u>or structure</u> (except network utilities <u>and Renewable Electricity Generation Activities</u>) located within 0 – 12 meters of a high-voltage transmission line is a restricted discretionary activity.</p>	transmission lines, through the management of risk associated with structures in close proximity to high voltage infrastructure. Electricity generation is not a network utilities, so needs an exclusion to avoid unnecessary consents.		
4b.1.8 Buildings within Outstanding Landscape Areas - OS68.41	<p>Retain Rule 4b.1.8 but amend the first exception to the rule as follows:</p> <p>EXCEPTION: This rule will not apply to the erection of structures:</p> <p>a. <u>Associated with existing renewable electricity generation activities including Wwithin Electricity Generation Core Sites.</u></p> <p>b. ...</p>	Mercury supports this exception as we agree that this RDA rule should not apply to structures within Electricity Generation Core Sites. However, there is no reason why this exception should not apply to all other existing renewable electricity generation activities.	Support	Manawa Energy supports this submission.
4b.1.9 Earthworks within Outstanding Landscape Areas - OS68.42	<p>Retain 4b.1.9 but amend the exception as follows: EXCEPTION: This rule will not apply to Earthworks <u>associated with existing and consented renewable electricity generation activities including</u> within Electricity Generation Core Sites</p>	Mercury supports this exception as we agree that this RDA rule should not apply to earthworks within Electricity Generation Core Sites. However, we consider that the exception should be extended to include other existing and consented renewable electricity generation activities.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.2.1 Vehicle movements - OS68.43	Retain 4b.2.1 but amend the exception as follows: EXCEPTION: This performance standard shall not apply to traffic movements involved in forest harvesting operations <u>or existing and consented renewable electricity generation activities.</u>	Mercury supports Rule 4b.2.1 subject to the exception being expanded to include renewable electricity generation activities.	Support	Manawa Energy supports this submission.
4b.2.5 Maximum building height - OS68.44	<p>Amend Rule 4b.2.5 as follows: 4b.2.5 Maximum building height i.... iv. 15 meters for <u>renewable Electricity Generation activities</u> on land identified as a Geothermal Area in Section O within an Electricity Generation Core Site.</p> <p>EXCEPTIONS:</p> <ul style="list-style-type: none"> · <u>Activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators including wind monitoring masts – no height limit</u> · Cranes being used as part of any construction or maintenance works for the duration of the works – no height limit. 	Mercury seeks amendments to Rule 4b.2.5 to make the rule applicable to all renewable electricity generation activities within Geothermal Areas. Activities of this nature tend to be temporary activity and any effects are easily remediated. An additional exception has been added to the rule on the basis of Policy G of NPS-REG.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<ul style="list-style-type: none"> · Drilling Rigs for up to 60 days per well allotment – no height limit. 			
4b.2.6 Minimum building setbacks - OS68.45	<p>Amend Rule 4b.2.6 as follows: 4b.2.6 Minimum building setbacks</p> <p>i....</p> <p>v. There shall be no front boundary setback for buildings and activities associated with Electricity Generation and Renewable Energy <u>Electricity Generation Activities</u> on land identified as Geothermal Area in Section O within an Electricity Generation Core Site where the road extends over any power generation Building or Structure.</p> <p>vi. There shall be no boundary setback for buildings and activities associated with <u>Renewable Electricity Generation Activities</u> on land identified as Geothermal Area in Section O <u>including</u> within an Electricity Generation Core Site</p> <p>EXCEPTIONS:</p> <ul style="list-style-type: none"> · For the purpose of this performance standard water tanks are not required to comply with the setback requirements in this standard. 	Mercury seeks minor amendments to Rule 4b.2.6 to make it more accurate and workable.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.2.7 Minor residential units - OS68.46	<p>Amend Rule 4b.2.7 as follows and to add a new clause (c): 4b.2.7 Minor residential units</p> <p>A maximum of one minor residential unit per primary residential unit per allotment.</p> <p>i. All minor residential <u>units</u> or accommodation activity units shall:</p> <p>a. Be no larger than 100m² in size</p> <p>b. Be located no greater than 20 metres from the primary residential unit.</p> <p>c. <u>Be located no closer than the existing primary residential unit on the same site to a Consent Area which is the subject of resource consents issued by the Waikato Regional Council for the take or discharge of geothermal fluid exceeding 1,000 tonnes per day provided that this clause shall not apply to properties more than 300m away from any aforementioned Consent Area.</u></p> <p>€d. Share an accessway/driveway with the primary residential unit.</p> <p>...</p>	<p>Minor residential units need to be located so that they do not create additional restrictions on renewable electricity generation activities by, for example, moving a point of noise compliance closer to the source of noise.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.2.8 Commercial and industrial activities, and home businesses units - OS68.47	<p>Amend Rule 4b.2.8 by including a new clause (iii) as below:</p> <p>4b.2.8 Commercial and industrial activities, and home businesses</p> <p>i. ...</p> <p>iii. Home businesses shall be <u>located no closer than the existing primary residential unit on the same site to a Consent Area which is the subject of resource consents issued by the Waikato Regional Council for the take or discharge of geothermal fluid exceeding 1,000 tonnes per day provided that this clause shall not apply to properties more that 300m away from any aforementioned Consent Area.</u></p> <p>...</p>	Home businesses need to be located so that they do not create additional restrictions on renewable electricity generation activities.	Support	Manawa Energy supports this submission.
4b.2.13 Maximum Noise – Other - OS68.48	<p>Amend Rule 4b.2.13 as follows: 4b.2.13 Maximum Noise – Other</p> <p>i. ...</p> <p>ii. Nothing in the foregoing Performance Standards shall apply to sirens, circuit breakers, <u>bursting discs, emergency or upset operating conditions</u> and hydro spills associated with the operation of <u>Renewable</u> Electricity Generation</p>	Mercury supports this rule subject to minor amendments to ensure it applies to all applicable circumstances.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<u>Activities Core-sites</u> . Provided that the activity shall comply with the requirements of S16 of the Resource Management Act 1991.			
4b.2.15 Signage - OS68.49	Retain Rule 4b.2.15.	Mercury supports this rule.	Support	Manawa Energy supports this submission.
4b.5.1 Subdivision - General Rural Environment - OS68.50	Retain Rule 4b.5.1 subject to an additional matter of control as set out in Rule 4b.5.3 (as per the relief below).	Mercury supports this rule subject to an additional matter of control as set out in Rule 4b.5.3.	Support	Manawa Energy supports this submission.
4b.5.3 Subdivision - Rural Lifestyle Environment that does not adjoin the General Rural Environment - OS68.51	Amend Rule 4b.5.3 to include an additional matter of control as 4b.5.3(i) as follows: 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: a).. i) <u>Any effects on the functioning of the Rural Environment including adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources.</u>	Mercury supports the inclusion of an additional matter over which control is reserved for controlled activities.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.5.4 Subdivision - Default Activity Status - OS68.52	Retain Rule 4b.5.4.	Mercury supports this rule.	Support	Manawa Energy supports this submission.
4b.5.5 Subdivision resulting in a new public road, or extension of existing public road - OS68.53	Retain Rule 4b.5.5	Mercury supports this rule.	Support	Manawa Energy supports this submission.
4b.5.5 Subdivision resulting in a new public road, or extension of existing public road - OS68.54	Retain Rule 4b.5.5.	Mercury supports this rule.	Support	Manawa Energy supports this submission.
4b.5.7 Subdivision - Outstanding Landscape Areas - OS68.55	Retain Rule 4b.5.7.	Mercury supports this rule.	Support	Manawa Energy supports this submission.
4b.5.8 Subdivision - Bonus Lots - OS68.56	Retain Rule 4b.5.8.	Mercury supports this rule.	Support	Manawa Energy supports this submission.
4b.5.9 Subdivision - More than 12 allotments - OS68.57	Retain Rule 4b.5.9.	Mercury supports this rule.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
General Rural and Rural Lifestyle Environments - OS68.58	Amend rule 4e.2.1 as follows: 4e.2.1 Foreshore Protection ... i. EXCEPTION: Electricity Generation Core Sites (as identified on the planning maps) – permitted activity where in accordance with Rule 4b.2.4 4e.2.1 and where located no more than 100 metres from any existing structure associated with power generation.	As a consequential change to the relief sought rule 4e.2.1 Foreshore Protection, must be edited to remove the reference to rule 4b.2.4 which no longer relates. Rule 4e.2.1 Foreshore Protection, must be edited to refer to rule 4b.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Areas	Support	Manawa Energy supports this submission.
4b.2.9 Maximum Noise – Limits - OS68.59	Retain 4b.2.9	Mercury supports this rule	Support	Manawa Energy supports this submission.
4b.2.10 Maximum Noise - Construction Noise - OS68.60	Retain 4b.2.10	Mercury supports this rule.	Support	Manawa Energy supports this submission.
4b.2.11 Maximum Noise - Electricity Generation Core Sites - OS68.61	Retain 4b.2.11	Mercury supports this rule.	Support	Manawa Energy supports this submission.
4b.2.12 Maximum Noise - Well Drilling and Testing - OS68.62	Retain 4b.2.12	Mercury supports this rule	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Amendments to the Definitions of the Taupo District Plan Section 10 - OS68.63	<p>Insert a new definition of Renewable Electricity Generation as follows (being the same definition in the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG):</p> <p><u>Renewable electricity generation means generation of electricity from solar, wind, hydro-electricity, geothermal, biomass, tidal, wave, or ocean current energy sources.</u></p>	Submitter seeks a new definition of Renewable Electricity Generation (being the same definition in the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG).	Support	Manawa Energy supports this submission.
Amendments to the Definitions of the Taupo District Plan Section 10 - OS68.64	<p>Insert a new definition for Reverse Sensitivity as follows:</p> <p><u>Reverse sensitivity is the vulnerability of a lawfully established activity to a new activity or land use. It arises when a lawfully established activity causes potential, actual or perceived adverse environmental effects on the new activity, to a point where the new activity may seek to restrict the operation or require mitigation of the effects of the established activity.</u></p>	Submitter seeks a new definition of Reverse Sensitivity which is the same definition as in the Waikato RPS.	Support	Manawa Energy supports this submission.
Balance Agri-Nutrients – Dominic Adams				

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Amendments to the Definitions of the Taupo District Plan Section 10 - OS78.3	Replace definition of Rural Industry with the NPS definition: <u>Rural Industry: means an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production.</u>	Ballance notes that the definition of Rural Industry is not as per the National Planning Standards definition and seeks that the definition is revised to align with the National Planning Standards.	Support	Manawa Energy supports this submission.
Objective 3b.2.5 Avoidance of reverse sensitivity - OS78.5	Retain the objective.	Ballance supports the protection of permitted and legally established activities from the effects of reverse sensitivity. "Reverse sensitivity effects on permitted and legally established activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided."	Support	Manawa Energy supports this submission.
Genesis Energy – Alice Lin				
Amendments to the Definitions of the Taupo District Plan Section 10 - OS84.11	Amend the definition of Rural Industry as shown, and insert new definitions of "Renewable Electricity Generation" and "Renewable Electricity Generation Activities" (being the same definitions in the NPS-REG). Rural Industry – an activity that directly supports, services, or is dependent on primary production	Genesis opposes the inclusion of "geothermal / electricity generation" within the definition of Rural Industry. The proposed definition is inconsistent with the National Planning Standard 2019 (NP Standard) definition for Rural Industry.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>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, <u>and dairy farming</u> and geothermal/electricity generation.</p>			
3b.1 Introduction - OS84.12	<p>Retain 3b.1 Introduction subject to amendments below:</p> <p>General Rural Environment</p> <p>The General Rural Environment Other prime characteristics of the General Rural Environment are the diverse range of land uses including farming, horticulture, energy <u>sources</u> and plantation forestry activities, with dispersed buildings and rural roads....</p> <p>The purpose of separating the General Rural Environment from the Rural Lifestyle Environment is to preserve the productive potential of the land <u>and other natural resources</u> within the General Rural Environment by retaining large property sizes and limiting the extent of housing provided for, yet allowing appropriate development to occur while</p>	<p>As previously identified, the TPS within the Rural Environment is also identified by the EGCS. Whilst this arrangement in the Taupo District Plan has generally served well for the TPS, in the context of the emerging climate change challenges, Genesis considers more enabling framework is necessary in the form of a dedicated Energy Chapter.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>preserving the 'openness'-<u>rural character</u> of the General Rural Environment. The creation of the General Rural Environment aims to support primary productive uses, <u>renewable electricity generation activities</u>, and rural industry, meaning an activity being activities that directly supports, services, or is are dependent on primary production and/<u>or</u> <u>has</u> a locational <u>or functional</u> need to be within the General Rural Environment (rather than an urban environment).</p> <p>Primary production a Activities in the General Rural Environment will produce effects that are different from urban areas, such as ...</p> <p>The General Rural Environment provisions seek to limit the scale of commercial and industrial activities unless they are dependent on primary production and/<u>or</u> have a <u>locational functional or operational</u> need to be within the General Rural Environment...</p> <p>Rural Lifestyle Environment ... By creating separate areas in appropriate locations within the Rural Environment, the Rural Lifestyle Environment creates areas for rural living on smaller property</p>			

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>sizes, whilst retaining separation from the rural production <u>and other</u> activities <u>predominating</u> in the General Rural Environment. This separation of activities serves to minimise reverse sensitivity issues. By concentrating rural residential development within the Rural Lifestyle Environment this serves to preserve <u>the open space characteristics rural character</u> and <u>the</u> productive potential of the rest of the Rural Environment...</p> <p>...The Rural Lifestyle Environment areas are located <u>closer in proximity</u> to urban areas to allow for access to community facilities within the district's townships.</p>			
Objective 3b.2.1 Enable Primary Production - OS84.13	<p>Retain Objective 3b.2.1 subject to amendments below.</p> <p>Objective 3b.2.1 Enable Primary Production and the Use of Natural Resources</p> <p>Primary production <u>and the use of natural resources</u> is enabled by protecting the availability of <u>the</u> rural land <u>and other</u> resources <u>and its</u> <u>their</u> productive capability.</p>	Genesis supports Objective 3b.2.1 with an amendment so that it covers a wider range of uses anticipated in the General Rural Environment beyond just "primary production".	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Objective 3b.2.2 Maintaining the established General Rural character - OS84.14	Amend Objective 3b.2.2 as shown below: Objective 3b.2.2 Maintaining the established General Rural character The established character of the General Rural Environment is maintained and the cumulative erosion of its character through incremental subdivision and development is avoided. <u>Enable a range of productive activities in the General Rural Environment that are compatible with rural character.</u>	Genesis is of the view that Objective 3b.2.2 is misguided and seeks to achieve the wrong outcome. Firstly, it presupposes that that the established character of the General Rural Environment represents a good environmental outcome in all respects to the extent that it should be "maintained". Secondly, an objective that seeks to maintain the "established character" is essentially seeking no change.	Support	Manawa Energy supports this submission.
Objective 3b.2.3 Rural industry - OS84.15	Retain Objective 3b.2.3 as notified, and insert a new objective following Objective 3b.2.3 as follows: Objective 3b.2.X Renewable Electricity Generation and Transmission Activities <u>Enable the development, operation, maintenance and upgrading of renewable electricity generation activities and transmission activities in the General Rural Environment.</u>	Due to its elevated status under the NPS-REG, Genesis has sought (above) that the definition of Rural Industry be amended to delete any reference to electricity generation and that a new definition of Renewable Electricity Generation be including in the Plan. In line with that outcome, a new objective needs to be included in the Plan seeking to enable renewable electricity generation activities (and transmission activities by association).	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Objective 3b.2.4 Other activities - OS84.16	Amend Objective 3b.2.4 as follows: Objective 3b.2.4 Other activities Maori cultural activities, tourism activities, <u>and</u> visitor accommodation and renewable electricity generation and transmission activities are enabled in <u>appropriate locations within</u> the General Rural Environment.	Visitor accommodation is a sensitive activity and should only be enabled in appropriate locations within the General Rural Environment rather than enabled anywhere including in locations whereby reverse sensitivities could arise.	Support	Manawa Energy supports this submission.
Objective 3b.2.5 Avoidance of reverse sensitivity - OS84.17	Amend Objective 3b.2.5 as follows: Objective 3b.2.5 Avoidance of reverse sensitivity Reverse sensitivity effects on permitted, and legally established, <u>and/or consented</u> activities within the General Rural Environment...	Genesis supports an objective in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects. However, Genesis is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already exists. The objective needs to also cover consented activities which have yet to be constructed / undertaken.	Support	Manawa Energy supports this submission.
Objective 3b.2.6 Impacts on infrastructure - OS84.18	Amend Objective 3b.2.6 as follows: Objective 3b.2.6 Impacts on infrastructure The impacts on infrastructure arising from subdivision and development are managed <u>do not</u>	Genesis considers an objective (or policy) that only seeks to "manage" something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupo District Plan.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<u>compromise the safe and efficient functioning of infrastructure.</u>			
Policy 3b.2.9 Maintaining the established character - OS84.19	Amend Policy 3b.2.9 as follows: Policy 3b.2.9 Maintaining the established Rural character Enable activities in the Maintain the established General Rural Environment <u>that will not compromise the character of the General Rural Environment</u> , as defined by: a) <u>Extensive pastoral farming and forestry</u> b) <u>Renewable electricity generation activities</u> c) <u>Geothermal steamfields, electricity transmission and distribution</u> ad) Large open spaces between built structures be) A mix of residential and rural industry buildings e) Noises related to production activities during the day but low levels of noise at night d) Low levels of light spill f) <u>Effects from activities including noise, vibration, odour and visual effects</u> e) Infrequent vehicle movements to	Genesis opposes Policy 3b.2.9 for the same reasons it opposes Objective 3b.2.2. The policy characterises the rural environment by matters such as “limited signage” whereas the existence of more than 20 large-scale renewable electricity generation activities is a far more significant and defining aspect of the General Rural Environment in the Taupo District.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	and from a site fg)...			
Policy 3b.2.10 Residential units - OS84.20	Amend Policy 3b.2.10 as follows: Policy 3b.2.10 Residential units Avoid the cumulative effects of rural lifestyle development by <u>providing for these activities within the Rural Lifestyle Environment and otherwise limiting residential units within the General Rural Environment</u> that: a) ... c) Erode the general rural character through its density, scale and location- d) <u>Result in the potential to generate reverse sensitivity effects.</u> e) <u>Constrain the ability to access or utilise renewable energy resources.</u>	Genesis supports Policy 3b.2.10 but considers it needs to be expanding to address one of the most significant adverse effects that can arise as a result of residential units being established in the General Rural Environment, that being reverse sensitivity effects. The establishment of residential units should also not constrain the ability to access or utilise renewable energy resources (which are of national significance).	Support	Manawa Energy supports this submission.
Policy 3b.2.12 Minor residential unit - OS84.21	Amend Policy 3b.2.12 as follows: Policy 3b.2.12 Minor residential unit Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and to ensure that the future availability of the rural land resource will not be compromised <u>and to avoid the</u>	It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment. A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<u>potential for reverse sensitivity effects.</u>	Environment) from the boundary with the General Rural Environment.		
Policy 3b.2.13 Avoiding reverse sensitivity - OS84.22	Amend Policy 3b.2.13 as follows: Policy 3b.2.13 Avoiding reverse sensitivity Any adverse effects generated by <u>an new sensitive activity</u> must be managed within the allotment so as to avoid adversely affecting reverse sensitivity effects on <u>permitted, and lawfully established and/or consented</u> neighbouring activities.	Genesis supports a policy in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects. Genesis seeks an amendment to the policy for the same reasons set out in relation to the changes sought to Objective 3b.2.5.	Support	Manawa Energy supports this submission.
Policy 3b.2.14 Commercial and industrial activity - OS84.23	Amend Policy 3b.2.14 as follows: Policy 3b.2.14 Commercial and industrial activity Limit the scale of commercial and industrial activity (<u>excluding renewable electricity generation activities</u>) to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary production <u>and other</u> activities <u>provided for</u> within the General Rural Environment.	Genesis supports the intent of the policy but considers it needs to be widened to cover other activities (including renewable electricity generation activities) that are provided for and anticipated in the General Rural Environment beyond just primary production.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Policy 3b.2.15 Allotment size - OS84.24	Retain Policy 3b.2.15 as notified.	Genesis supports Policy 3b.2.15 on the basis that it reinforces the intent that the General Rural Environment is for larger scale productive activities (rather than rural residential opportunities).	Support	Manawa Energy supports this submission.
Objective 3b.3.1 Maintain the character of the Rural Lifestyle Environment - OS84.25	Delete Objective 3b.3.1 and replace it with the following: Objective 3b.3.1 Enable Rural Residential Activities <u>Zone parts of the Rural Environment as Rural Lifestyle Environment to enable and provide for rural residential activities in appropriate locations where they will not give rise to reverse sensitivity effects on the surrounding General Rural Environment or Industrial Environments.</u>	This is an unexpected objective for the parts of the Rural Environment where a greater density of subdivision and development is anticipated and provided for. The objective should focus on enabling rural residential opportunities in appropriate locations (i.e. where they will not create reverse sensitivity effects on activities in the wider General Rural Environment or Industrial Environments).	Support	Manawa Energy supports this submission.
Objective 3b.3.2 Avoid reverse sensitivity - OS84.26	Amend Objective 3b.3.2 as follows: Objective 3b.3.2 Avoid reverse sensitivity Adverse reverse sensitivity effects, including conflict with on permitted, and legally established and/or consented activities in	Genesis supports an objective in the Rural Lifestyle Environment chapter that seeks to avoid reverse sensitivity effects. However, Genesis is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already exists. The	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	neighbouring Environments, are avoided.	objective needs to also cover consented activities which have yet to be constructed / undertaken.		
Objective 3b.3.3 Commercial and industrial activities - OS84.27	Amend Objective 3b.3.3 as follows: Objective 3b.3.3 Commercial and industrial activities The establishment of commercial and industrial activities that have no functional need to locate and are incompatible with the rural residential activities occurring within the <u>Rural Lifestyle Environment</u> are avoided.	Genesis supports Objective 3b.3.3 but it needs to be more precisely drafted for accuracy and clarity.	Support	Manawa Energy supports this submission.
Objective 3b.3.4 Consolidate rural lifestyle activities - OS84.28	Retain Objective 3b.3.4.	Genesis supports the consolidation of Rural Lifestyle activities within identified and appropriately located Rural Lifestyle Environments.	Support	Manawa Energy supports this submission.
Objective 3b.3.6 Impacts on community infrastructure - OS84.29	Amend Objective 3b.3.6 as follows: Objective 3b.2.6 Impacts on community infrastructure The impacts on community infrastructure arising from subdivision and development are managed do not compromise the	An objective (or policy) that only seeks to "manage" something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupo District Plan. The objective should apply to all	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<u>safe and efficient functioning of infrastructure.</u>	infrastructure, not just community infrastructure.		
Policy 3b.3.9 Character of the Rural Lifestyle Environment - OS84.30	Add a new point i) to Policy 3b.3.9 as follows: Policy 3b.3.9 Character of the Rural Lifestyle Environment Manage the anticipated character of the Rural Lifestyle Environment as defined by: a) ... i) <u>An environment that is surrounded by a working rural environment including rural production, geothermal steamfields and renewable electricity generation activities.</u>	Genesis supports Policy 3b.3.9 but considers it also needs to recognise, and not have adverse effects on, the nature of the surrounding General Rural Environment.	Support	Manawa Energy supports this submission.
Policy 3b.3.10 Lot sizes and setbacks for allotments adjoining the General Rural Environment - OS84.31	Retain Policy 3b.3.10 as notified.	Requiring larger lot sizes and greater building setbacks for new dwellings within the Rural Lifestyle Environment are two key methods for managing reverse sensitivity effects. Genesis therefore supports this policy on this basis.	Support	Manawa Energy supports this submission.
Policy 3b.3.12 Minor residential unit - OS84.32	Amend Policy 3b.3.12 as follows: Policy 3b.3.12 Minor residential unit Manage the scale and location of	A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and to further protect the character of the #Rural Lifestyle Environment, <u>and to avoid reverse sensitivity effects.</u></p>	<p>boundary with the General Rural Environment. It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.</p>		
<p>4b.1.1 Activities in the General Rural Environment - OS84.33</p>	<p>Retain Rule 4b.1.1 as notified.</p>	<p>Genesis supports Rule 4b.1.1 on the basis that it is consistent with the approach throughout the rest of the Plan, is effects based, and enables activities to occur that do not need to be the subject of a resource consent application process.</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>
<p>4b.1.2 Minor residential units - OS84.34</p>	<p>Retain Rule 4b.1.2 subject to the amendments below.</p> <p>f. The ability to mitigate <u>avoid</u> adverse effects, <u>including reverse sensitivity effects</u>, through the use of screening, planting, landscaping, and alternative design, <u>and/or other means including restrictive covenants.</u></p> <p>-</p> <p>i. <u>The potential to constrain access to and/or the utilisation of renewable energy sources.</u></p>	<p>Minor residential units are sensitive activities whereby their establishment needs to be controlled so as to not result in reverse sensitivity effects. The relevant matters of discretion should therefore consider any potential for reverse sensitivity effects. An additional criterion is also suggested to ensure that minor residential units do not constrain access to and/or the utilisation of renewable energy sources.</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Steamfields - OS84.35	<p>Amend Rule 4b.1.4 as follows:</p> <p>4b.1.4 Electricity Generation Core Sites, Renewable Energy Electricity Generation Activities and Geothermal Steamfields Areas</p> <p>i. Any activity involving continued operation, maintenance and minor upgrading of existing electricity generation core sites, geothermal steamfields areas, renewable energy electricity generation activities and associated structures and ancillary activities is a permitted activity.</p> <p>NOTE: For the purpose of this rule “maintenance” means: All activities associated with the protective care, and monitoring of a hydro dam, a geothermal or hydroelectric power station, geothermal steamfields and associated structures, in order to monitor, testing and/or arresting the processes of decay, structural fatigue, erosion or dilapidation of all associated structures and includes maintenance of surrounds and water areas.</p> <p>NOTE: For the purpose of this rule “minor upgrading” means: Structural improvement,</p>	Genesis supports the retention of Rule 4b.1.4 (being a continuation of the Rule in currently in the Rural Environment) with a number of minor amendments. This is the enabling rule that appropriately provides for renewable electricity generation activities in the General Rural Environment.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>repair and replacement or <u>upgrade of components, or activities required for the continued safe and efficient operation</u> including worn or technically deficient parts of <u>any structure including the</u> powerhouse, hydro dams, separation plants, switchyards, intake, control and diversion structures, wells, pipes, tunnels, cables, other equipment and accessory buildings and structures of similar character and scale, and includes associated drilling, <u>vehicles, infrastructure, machinery, testing, monitoring, earthworks and vegetation removal.</u> Also the extension to existing Buildings and Structures, and the erection of new Buildings and Structures up to 100m² in area and not exceeding the maximum height standard for the Rural Environment and the erection of any aerial, antennae or communication dish not exceeding 5m² in area located on top of a hydro or geothermal existing structure, subject to compliance with the Noise Performance Standard.</p>			

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.1.5 Commercial and industrial activities, and home businesses, - OS84.36	Retain Rule 4b.1.5 subject to the amendments below. ... When considering activities under Rule 4b.1.5ii Council restricts the exercise of its discretion to the following matters: c. The effect of the activity on surrounding land uses (<u>including reverse sensitivity effects</u>) and how these effects can be managed onsite and/or mitigated.	As home businesses could include sensitive activities, Genesis considered there is a need to avoid creating reverse sensitivity effects which should be a matter of discretion.	Support	Manawa Energy supports this submission.
4b.1.7 High voltage transmission lines - OS84.37	Retain Rule 4b.1.7 subject to the amendments shown: 4b.1.7 <u>Buildings and structures in proximity to High voltage transmission lines</u> i. Any building <u>or structure</u> (except network utilities <u>or renewable electricity generation activities</u>)...	Genesis supports this rule as it seeks to ensure the safe operation of transmission lines. However the heading of the rule needs to be more accurate and the rule needs to provide for renewable electricity generation activities (new definition included, which includes maintenance activities) which, by nature of the activity, are connected to the high-voltage network.	Support	Manawa Energy supports this submission.
4b.1.8 Buildings within Outstanding Landscape Areas - OS84.38	Retain Rule 4b.1.8 but amend the first exception to the rule as follows: ... is a restricted discretionary activity . EXCEPTION: This rule will not apply	Genesis supports this rule on the basis that it does not apply to buildings within Electricity Generation Core Sites. However, Genesis considers the exception should be broadened to include all other	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	to the erection of structures: a. <u>Associated with existing renewable electricity generation activities including W</u> within Electricity Generation Core Sites...	existing renewable electricity generation activities.		
4b.1.9 Earthworks within Outstanding Landscape Areas - OS84.39	Retain Rule 4b.1.9 but amend the exception to the rule as follows: ... EXCEPTION: This rule will not apply to Earthworks <u>associated with existing and consented renewable electricity generation activities including</u> within Electricity Generation Core Sites.	Genesis supports this rule on the basis that it does not apply to earthworks within Electricity Generation Core Sites. However, Genesis considers the exception should be broadened to include all other existing renewable electricity generation activities.	Support	Manawa Energy supports this submission.
4b.2.1 Vehicle movements - OS84.40	Retain 4b.2.1 subject to the amendment below. ... This performance standard shall not apply to traffic movements involved in forest harvesting operations <u>or existing and/or consented renewable electricity generation activities.</u>	Genesis supports Rule 4b.2.1 subject to the exception being expanded to include renewable electricity generation activities.	Support	Manawa Energy supports this submission.
4b.2.9 Maximum Noise – Limits - OS84.41	Retain 4b.2.9 as notified.	Genesis support performance standard 4b.2.9 as it retains the existing provision in the District Plan.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.2.10 Maximum Noise - Construction Noise - OS84.42	Retain 4b.2.10 as notified.	Genesis supports performance standard 4b.2.10 as the New Zealand Standard for construction noise is a well understood standard.	Support	Manawa Energy supports this submission.
4b.2.11 Maximum Noise - Electricity Generation Core Sites - OS84.43	Retain 4b.2.11 as notified.	Genesis supports performance standard 4b.2.11 as it retains the existing provision in the District Plan.	Support	Manawa Energy supports this submission.
4b.2.13 Maximum Noise – Other - OS84.44	<p>Amend Rule 4b.2.13 as follows:</p> <p>4b.2.13 Maximum Noise – Other</p> <p>i. ...91</p> <p>ii. Nothing in the foregoing Performance Standards shall apply to sirens, circuit breakers, <u>bursting discs, emergency or upset operating conditions</u> and hydro spills associated with the operation of <u>Renewable Electricity Generation Activities Core sites</u>. Provided that the activity shall comply with the requirements of S16 of the Resource Management Act 1991.</p>	Genesis supports this rule subject to minor amendments to ensure it applies to all applicable circumstances.	Support	Manawa Energy supports this submission.
4b.5.3 Subdivision - Rural Lifestyle Environment that	Amend Rule 4b.5.3 as follows: ... For the purposes of Rules 4b.5.1.i, 4b.5.2.i and 4b.5.3.i the matters over which the Council	Genesis supports this rule with the inclusion of an additional matter over	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
does not adjoin the General Rural Environment - OS84.45	<p>reserves control for the purpose of assessment are:</p> <p>...</p> <p><u>i) Any effects on the functioning of the Rural Environment including adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources.</u></p>	which control is reserved for controlled activities.		
General Rural and Rural Lifestyle Environments - OS84.46	<p>Genesis seeks the relief set out under each relevant provision. To the extent that any of the relief sought is not accepted, Genesis seeks any alternative relief which will have the same or similar effect.</p>	<p>Genesis generally supports the creation of the Rural Lifestyle Environment on the basis that they can provide for rural residential activities in appropriate locations, which do not include within or in close proximity to permitted, lawfully existing and/or consented renewable electricity generation activities. If Rural Lifestyle Environments are only located in appropriate locations, that outcome avoids the need for Genesis (and others) to seek changes to the rules and performance standards relating to the Rural Lifestyle Environment to avoid reverse sensitivity effects. That is the approach taken in this submission where amendments are focused on the proposed objectives and policies.</p>		

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Amendments to the Definitions of the Taupo District Plan Section 10 - OS84.48	<p>Insert a new definition of "reverse sensitivity" (being the definition in the Waikato Regional Policy Statement) as follows:</p> <p>Reverse sensitivity means the <u>potential for the operation of an existing lawfully established activity to be compromised, constrained or curtailed by the more recent establishment of other activities which are sensitive to the adverse environmental effects being generated by the pre-existing activity.</u></p>	<p>Further to Genesis' submission to the definition of Rural Industry, due to the nature of the wider submissions by Genesis, a definition for "Reverse Sensitivity" need to be included in the Taupo District Plan.</p> <p>Amendments to the Definitions of the Taupo District Plan Section 10</p>	Support	Manawa Energy supports this submission.
Amendments to the Definitions of the Taupo District Plan Section 10 - OS84.49	<p>Add definition: <u>Renewable electricity generation means generation of electricity from solar, wind, hydro-electricity, geothermal, biomass, tidal, wave, or ocean current energy sources.</u></p>	<p>Submitter seeks a new definition for Renewable Electricity Generation.</p>	Support	Manawa Energy supports this submission.
Amendments to the Definitions of the Taupo District Plan Section 10 - OS84.50	<p>Add definition: <u>Renewable electricity generation activities means the construction, operation and maintenance of structures associated with renewable electricity generation. This includes</u></p>	<p>Submitter seeks a new definition for Renewable Electricity Generation Activities.</p>	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p><u>small and community-scale distributed renewable generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.</u></p>			
Federate Farmers NZ – Colin Guyton				
3b.2 Objectives and Policies - General Rural Environment - OS91.12	<p>(a) the amendment of the objectives for chapter 3b Rural Environment so that they clearly state what is to be achieved, where the objective is to be achieved and when the objective will be achieved; and</p> <p>(b) the amendment of objective 3b.2.6 so that it reads as follows or with wording to similar effect: Objective 3b.2.6 Impacts on essential infrastructure The impacts on <i>essential</i> infrastructure arising from <u>inappropriate subdivision, use and development are managed avoided, remedied or mitigated where it is possible to do so.</u></p>	<p>Federated Farmers has concerns over Objective 3b.2.6 which deals with the impacts on infrastructure from subdivision and development. We recognise that for some essential infrastructure there will be a need to locate in the rural environment. However, the objective also should acknowledge that essential infrastructure can cause reverse sensitivity effects on activities located in the rural environment. Objective 3b.2.4 as currently drafted is inconsistent with Part 2 of the Resource Management Act 1911. It is not appropriate that the objective does not address both sides of the issue or that it seeks to protect</p>	Oppose	Manawa Energy opposes this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	(c) the insertion of a definition for 'essential infrastructure' into the district plan; and (d) any consequential amendments required as a result of the relief sought.	all infrastructure from the effects of all subdivision and development.		
3b.2 Objectives and Policies - General Rural Environment - OS91.13	(a) the amendment of the policies for chapter 3b Rural Environment so that they clearly state how the objective will be met by this policy, where in the region or district will the policy apply, what course of action is to be taken and when, and who is required to comply with the policy and who is to implement the policy; and (b) any consequential amendments required as a result of the relief sought.	Policies need to be written to provide clear direction to decision makers who will be making the decisions on the methods and/or rules used to implement the policies and to address effects. This requires consideration of how will the policy meet the relevant objective, where in the district or region does the policy apply, what action is required to be taken and when (i.e., under what circumstances), who is required to comply with the policy and who will implement the policy It also needs to be made clearer which objectives some of the policies are related to.	Support	Manawa Energy supports this submission and its intent to seek clarity of policy direction.
Contact Energy – Mark Crisp				
General Rural and Rural Lifestyle Environments - OS93.23	If Rural Lifestyle Environments are only located in appropriate locations, that outcome avoids the need to Contact (and others) to seek changes to the rules and	Contact supports the creation of Rural Lifestyle Zones on the basis that they can provide for rural residential activities in appropriate locations. However, a key aspect of	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>performance standards relating to the Rural Lifestyle Environment to avoid reverse sensitivity effects. That is the approach that has been taken in this submission. If Contact's relief sought in relation to the location of Rural Lifestyle Zones is not accepted, then Contact seeks alternative relief (including additional changes to the rules and performance standards relating to the Rural Lifestyle Environment) which will avoid the creation of reverse sensitivity effects.</p>	<p>Contact's submission is seeking to ensure that Rural Lifestyle Zones are only created in appropriate locations which does not include within or in close proximity to permitted, lawfully existing and/or consented renewable electricity generation activities.</p>		
<p>Amendments to the Definitions of the Taupo District Plan Section 10 - OS93.24</p>	<p>Amend the definition of Rural Industry as follows: Rural Industry – 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>Insert a new definition of Renewable Electricity Generation as</p>	<p>Renewable electricity generation is an activity that has been recognised in the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG) as a matter of national significance. Renewable electricity generation is also an activity identified in the Waikato RPS and Bay of Plenty RPS as a Regionally Significant Infrastructure. It is therefore inappropriate to treat that activity as part of, and in the same manner as, other activities that occur in the rural environment such as forestry, agriculture and dairy farming. The elevated status and</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>follows (being the same definition in the NPS-REG): Renewable electricity generation means generation of electricity from solar, wind, hydro-electricity, geothermal, biomass, tidal, wave, or ocean current energy sources.</p>	<p>importance of renewable electricity generation should be recognised in the Taupo District Plan with its own set of objectives, policies and methods.</p>		
<p>Amendments to the Definitions of the Taupo District Plan Section 10 - OS93.25</p>	<p>Insert a new definition of Renewable electricity generation activities (being the same definition in the NPS-REG) as follows: Renewable electricity generation activities means the construction, operation and maintenance of structures associated with renewable electricity generation. This includes small and community-scale distributed renewable generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.</p>	<p>Due to the nature of the following submissions by Contact, additional definitions need to be included in the Taupo District Plan.</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>
<p>3b.1 Introduction - OS93.26</p>	<p>Amend the Introduction to Chapter 3b.1 as follows: General Rural Environment</p>	<p>Contact generally supports the introductory statement but seeks minor changes to recognise the</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>...Other prime characteristics of the General Rural Environment are the diverse range of land uses including farming, horticulture, energy <u>sources</u> and plantation forestry activities, with dispersed buildings and rural roads...</p> <p>The purpose of separating the General Rural Environment from the Rural Lifestyle Environment is to preserve the productive potential of the land <u>and other natural resources</u> within the General Rural Environment by retaining large property sizes and limiting the extent of housing provided for, yet allowing appropriate development to occur while preserving the <u>rural character</u> openness of the General Rural Environment. The creation of the General Rural Environment aims to support primary productive uses, <u>renewable electricity generation activities</u>, and rural industry, meaning an activity being activities that directly supports, services, or is are dependent on primary production and/or <u>has</u> a locational <u>or functional</u> need to be within the General Rural Environment (rather than an urban environment).</p>	<p>importance and functional need for renewable electricity generation to occur within the Rural Environment, its contribution to the regional economy and New Zealand's security of electricity supply.</p>		

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>Primary production Activities in the General Rural Environment will produce effects that are different from urban areas, such as noise, odour, vibration, spray drift and dust...</p> <p>The General Rural Environment provisions seek to limit the scale of commercial and industrial activities unless they are dependent on primary production and/or have a <u>locational, functional or operational</u> need to be within the General Rural Environment...</p> <p>Rural Lifestyle Environment ... By creating separate areas in appropriate locations within the Rural Environment, the Rural Lifestyle Environment creates areas for rural living on smaller property sizes, whilst retaining separation from the rural production <u>and other</u> activities predominating in the General Rural Environment. This separation of activities serves to minimise reverse sensitivity issues. By concentrating rural residential development within the Rural Lifestyle Environment this serves to preserve the open space <u>characteristics, rural character and</u> <u>the productive potential</u> of the rest of the Rural Environment, and to</p>			

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>reduce the potential for land use conflict.</p> <p>.... The Rural Lifestyle Environment areas are located closer <u>in proximity</u> to urban areas to allow for access to community facilities within the district's townships.</p>			
3b.1 Introduction - OS93.27	<p>Retain Objective 3b.2.1.</p> <p>Objective 3b.2.1 Enable Primary Production and the Use of Natural Resources</p> <p>Primary production <u>and the use of natural resources are</u> is enabled by protecting the availability of the rural land <u>and other</u> resources <u>and its</u> <u>their</u> productive capability.</p>	<p>Contact supports Objective 3b.2.1 with an amendment so that it covers a wider range of uses anticipated in the General Rural Environment beyond just "primary production". One of the policies which achieves Objective IM-02 is IM-P4 'Regionally Significant Industry and Primary Production'. The suggested amendments give effect to the Waikato RPS.</p>	Support	<p>Manawa Energy supports this submission.</p>
Objective 3b.2.2 Maintaining the established General Rural character - OS93.28	<p>Amend Objective 3b.2.2 to read:</p> <p>Objective 3b.2.2 Maintaining the established General Rural character</p> <p>The established character of the General Rural Environment is maintained and the cumulative erosion of its character through incremental subdivision and development is avoided.</p> <p><u>Enable a range of activities in the</u></p>	<p>Contact is of the view that Objective 3b.2.2 is misguided and seeks to achieve the wrong outcome. Firstly, it presupposes that the established character of the General Rural Environment represents a good environmental outcome in all respects to the extent that it should be "maintained". Secondly, an objective that seeks to maintain the "established character" is essentially</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<u>General Rural Environment that are compatible with rural character.</u>	seeking no change. The objective seeks to <u>avoid</u> "incremental subdivision and development" which essentially locks in the status quo and will make it difficult for any new development to occur, including new development that has been identified in other planning provision as being appropriately located in the General Rural Environment.		
Objective 3b.2.3 Rural industry - OS93.29	Retain Objective 3b.2.3. Inset a new objective following Objective 3b.2.3 as follows: <u>Objective 3b.2.X Renewable Electricity Generation and Transmission Activities</u> <u>Enable the development, operation, maintenance and upgrading of renewable electricity generation activities and transmission activities in the General Rural Environment.</u>	Due to its elevated status under the NPS-REG, Contact has sought (above) that the definition of Rural Industry be amended to delete any reference to electricity generation and that a new definition of Renewable Electricity Generation and Renewable Electricity Generation Activities be including in the Plan. In line with that outcome, a new objective needs to be included in the Plan seeking to enable renewable electricity generation activities (and transmission activities by association).	Support	Manawa Energy supports this submission.
Objective 3b.2.4 Other activities - OS93.30	Amend Objective 3b.2.4 as follows: <u>Objective 3b.2.4 Other activities</u> Maori cultural activities, tourism activities, <u>and</u> visitor accommodation <u>and renewable</u>	As a consequential change to the relief sought above (inserting a new objective in relation to renewable electricity generation activities), Objective 3b.2.4 needs to be	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>electricity generation and transmission activities are enabled in <u>appropriate locations within</u> the General Rural Environment.</p>	<p>amended to remove the reference to renewable electricity generation (and transmission by association). Visitor accommodation is a sensitive activity and should only be enabled in appropriate locations within the General Rural Environment rather than enabled anywhere including in locations whereby reverse sensitivities could arise.</p>		
<p>Objective 3b.2.5 Avoidance of reverse sensitivity - OS93.31</p>	<p>Amend Objective 3b.2.5 as follows: Objective 3b.2.5 Avoidance of reverse sensitivity Reverse sensitivity effects on permitted, and legally established, <u>and/or consented</u> activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided.</p>	<p>Contact supports an objective in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects. However, Contact is concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already <i>exists</i>. This is particularly concerning for Contact. The objective needs to also cover consented activities which have yet to be constructed / undertaken. Contact's geothermal generation activities, which do and are anticipated to occur in the District's General Rural Environment (as identified in the introductory text to this chapter and Strategic Directions chapter).</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
Objective 3b.2.6 Impacts on infrastructure - OS93.32	Amend Objective 3b.2.6 as follows: Objective 3b.2.6 Impacts on infrastructure The impacts on infrastructure arising from subdivision and development are managed, do not compromise the safe and efficient functioning of infrastructure.	An objective (or policy) that only seeks to "manage" something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupo District Plan.	Support	Manawa Energy supports this submission.
Policy 3b.2.9 Maintaining the established character - OS93.33	Amend Policy 3b.2.9 as follows: Policy 3b.2.9 Maintaining the established Rural character Enable activities in the Maintain the established General Rural Environment that will not compromise the character of the General Rural Environment, as defined by: a) <u>Extensive pastoral farming and forestry</u> b) <u>Renewable electricity generation activities</u> c) <u>Geothermal areas and activities, electricity transmission and distribution</u> ad) ... e) Noises related to production activities during the day but low levels of noise at night d) Low levels of light spill	Contact is of the view that Policy 3b.2.9 is misguided and seeks to achieve the wrong outcome. The policy characterises the rural environment by matters such as "limited signage" whereas the existence of more than 20 large-scale renewable electricity generation activities is a far more significant and defining aspect of the General Rural Environment in the Taupo District.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>f) <u>Effects from activities including noise, vibration, dust, odour and visual effects</u></p> <p>e) Infrequent vehicle movements to and from a site</p> <p>fg)...</p>			
<p>Policy 3b.2.10 Residential units - OS93.34</p>	<p>Amend Policy 3b.2.10 as follows: Policy 3b.2.10 Residential units Avoid the cumulative effects of rural lifestyle development by <u>providing for these activities within the Rural Lifestyle Environment and otherwise limiting residential units within the General Rural Environment</u> that:</p> <p>a) ...</p> <p>c) Erode the general rural character through its density, scale and location-</p> <p>d) <u>Result in the potential to generate reverse sensitivity effects.</u></p> <p>e) <u>Constrain the ability to access or utilise renewable energy resources.</u></p>	<p>Contact supports Policy 3b.2.10 but it needs to be expanding to address one of the most significant adverse effects that can arise as a result of residential units being established in the General Rural Environment, that being reverse sensitivity effects. The establishment of residential units should also not constrain the ability to access or utilise renewable energy resources (which are of national significance).</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>
<p>Policy 3b.2.12 Minor residential unit - OS93.35</p>	<p>Amend Policy 3b.2.12 as follows: Policy 3b.2.12 Minor residential unit Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the</p>	<p>It is important that the location of minor residential units is managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment. A minor residential unit is a sensitive activity,</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	allotment, is of a suitable size, and to ensure that the future availability of the rural land resource will not be compromised <u>and to avoid the potential for reverse sensitivity effects.</u>	and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment.		
Policy 3b.2.13 Avoiding reverse sensitivity - OS93.36	Amend Policy 3b.2.13 as follows: Policy 3b.2.13 Avoiding reverse sensitivity Any adverse effects generated by an <u>new sensitive activity</u> must be managed within the allotment so as to avoid adversely affecting reverse sensitivity effects on permitted, and lawfully established <u>and/or consented</u> neighbouring activities.	Contact supports a policy in the General Rural Environment chapter that seeks to avoid reverse sensitivity effects. Contact seeks an amendment to the policy for the same reasons set out in relation to the changes sought to Objective 3b.2.5.	Support	Manawa Energy supports this submission.
Policy 3b.2.14 Commercial and industrial activity - OS93.37	Amend Policy 3b.2.14 as follows: Policy 3b.2.14 Commercial and industrial activity Limit the scale of commercial and industrial activity (<u>excluding renewable electricity generation activities</u>) to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary production <u>and other</u> activities	Because renewable electricity generation activities fall within the definition of industrial activities, they need to be excluded from the first part of the policy which seeks to limit commercial and industrial activities. Contact supports the intent of the policy but it needs to be widened to cover other activities (including renewable electricity generation activities) that are provided for and anticipated in the	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<u>provided for</u> within the General Rural Environment.	General Rural Environment beyond just primary production.		
Policy 3b.2.15 Allotment size - OS93.38	Retain Policy 3b.2.15.	Contact supports Policy 3b.2.15 on the basis that it reinforces the intension that the General Rural Environment is for larger scale productive activities (rather than rural residential opportunities).	Support	Manawa Energy supports this submission.
Objective 3b.3.1 Maintain the character of the Rural Lifestyle Environment - OS93.39	Delete Objective 3b.3.1 and replace it with the following: Objective 3b.3.1 Enable Rural Residential Activities <u>Zone parts of the Rural Environment as Rural Lifestyle Environment to enable and provide for rural residential activities in appropriate locations where they will not give rise to reverse sensitivity effects on the surrounding General Rural Environment or Industrial Environments.</u>	This is an unexpected objective for the parts of the Rural Environment where a greater density of subdivision and development is anticipated and provided for. The objective should focus on enabling rural residential opportunities in appropriate locations (i.e. where they will not create reverse sensitivity effects on activities in the wider General Rural Environment or Industrial Environments).	Support	Manawa Energy supports this submission.
Objective 3b.3.2 Avoid reverse	Amend Objective 3b.3.2 as follows: Objective 3b.3.2 Avoid reverse sensitivity Adverse reverse sensitivity effects;	Contact supports an objective in the Rural Lifestyle Environment chapter that seeks to avoid reverse sensitivity effects. However, Contact is		

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
sensitivity - OS93.40	including conflict with on permitted, and legally established and/or consented activities in neighbouring Environments, are avoided.	concerned that the scope of the objective is too narrow. As currently drafted it would only require reverse sensitivity effects to be avoided where an activity already <i>exists</i> . This is particularly concerning for Contact. The objective needs to also cover consented activities which have yet to be constructed / undertaken.		
Objective 3b.3.3 Commercial and industrial activities - OS93.41	Amend Objective 3b.3.3 as follows: Objective 3b.3.3 Commercial and industrial activities The establishment of commercial and industrial activities that have no functional need to locate and are incompatible with the rural residential activities occurring within the <u>Rural Lifestyle Environment</u> are avoided.	Contact supports Objective 3b.3.3 but it needs to be more precisely drafted for accuracy and clarity.	Support	Manawa Energy supports this submission.
Objective 3b.3.4 Consolidate rural lifestyle activities - OS93.42	Retain Objective 3b.3.4.	Contact supports the consolidation of Rural Lifestyle activities within identified and appropriately located Rural Lifestyle Environments.	Support	Manawa Energy supports this submission.
Objective 3b.3.6 Impacts on community	Amend Objective 3b.3.6 as follows: Objective 3b.2.6 Impacts on community infrastructure The impacts on community	An objective (or policy) that only seeks to "manage" something (with no specified outcome) provides no useful guidance to resource	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
infrastructure - OS93.43	infrastructure arising from subdivision and development are managed <u>do not compromise the safe and efficient functioning of infrastructure.</u>	management decision makers or other users of the Taupo District Plan. The objective should apply to all infrastructure, not just community infrastructure.		
Policy 3b.3.9 Character of the Rural Lifestyle Environment - OS93.44	Add a new point i) to Policy 3b.3.9 as follows: i) <u>An environment that is surrounded by a working rural environment including rural production, geothermal areas and renewable electricity generation activities.</u>	Contact supports Policy 3b.3.9 but it also needs to recognise, and not have adverse effects on, the nature of the surrounding General Rural Environment.		
Policy 3b.3.10 Lot sizes and setbacks for allotments adjoining the General Rural Environment - OS93.45	Retain Policy 3b.3.10.	Requiring larger lot sizes and greater building setbacks for new dwellings within the Rural Lifestyle Environment are two key methods for managing reverse sensitivity effects. Contact therefore supports this policy on this basis.	Support	Manawa Energy supports this submission.
Policy 3b.3.12 Minor residential unit - OS93.46	Amend Policy 3b.3.12 as follows: Policy 3b.3.12 Minor residential unit Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and	A minor residential unit is a sensitive activity, and these should also be setback (like new houses in the Rural Lifestyle Environment) from the boundary with the General Rural Environment. It is important that the location of minor residential units is	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	to further protect the character of the #Rural Lifestyle Environment: <u>and to avoid reverse sensitivity effects.</u>	managed to avoid the potential for reverse sensitivity effects on activities in the General Rural Environment.		
4b.1.1 Activities in the General Rural Environment - OS93.47	Retain Rule 4b.1.1.	Contact supports Rule 4b.1.1 on the basis that it is consistent with the approach throughout the rest of the Plan, is effects based, and enables activities to occur that do not need to be the subject of a resource consent application process.	Support	Manawa Energy supports this submission.
4b.1.2 Minor residential units - OS93.48	Amend Rule 4b.1.2 as follows: i.... f. The ability to mitigate <u>avoid</u> adverse effects, <u>including reverse sensitivity effects</u> , through the use of screening, planting, landscaping, and <u>alternative design, and/or other means including restrictive covenants.</u> ... i. <u>The potential to constrain access to and/or the utilisation of renewable energy sources.</u>	Minor residential units are sensitive activities whereby their establishment needs to be controlled so as to not result in reverse sensitivity effects. An additional criterion has been added to ensure that minor residential units do not constrain access to and/or the utilisation of renewable energy sources.	Support	Manawa Energy supports this submission.
4b.1.3 Temporary Activities - OS93.49	Retain Rule 4b.1.3.	Contact supports this rule.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.1.4 Electricity Generation Core Sites, Renewable Energy Generation Activities and Geothermal Steamfields - OS93.50	<p>Amend Rule 4b.1.4 as follows:</p> <p>4b.1.4 Electricity Generation Core Sites, Renewable Electricity Energy Generation Activities and Geothermal Areas Steamfields</p> <p>i. Any activity involving continued operation, maintenance and minor upgrading of existing electricity generation core sites, geothermal <u>areas steamfields</u>, renewable <u>energy electricity</u> generation activities and associated structures <u>and ancillary activities</u> is a permitted activity.</p> <p>ii. <u>Activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators are a permitted activity.</u></p> <p>NOTE: For the purpose of this rule "maintenance" means: All activities associated with the protective care, and monitoring of a hydro dam, a geothermal or hydroelectric power station, geothermal steamfields and associated structures, in order to monitor, test and/or arrest the processes of decay, structural fatigue, erosion or dilapidation <u>of all associated structures and</u></p>	<p>Contact supports the retention of Rule 4b.1.4 (being a continuation of the Rule in currently in the Rural Environment) with a number of minor amendments. This is the enabling rule that appropriately provides for the operation, maintenance and minor upgrading renewable electricity generation activities in the General Rural Environment. The term "Geothermal Areas" has been used rather than "Geothermal Steamfields" due to Section O of the Plan identifying and mapping Geothermal Areas. A second clause has been added to the rule on the basis of Policy G of NPS-REG.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>includes maintenance of surrounds and water areas.</p> <p>NOTE: For the purpose of this rule "minor upgrading" means: Structural improvement, repair and replacement <u>or upgrade of components, or activities required for the continued safe and efficient operation</u> including worn or technically deficient parts of <u>any structure including</u> the powerhouse, hydro dams, separation plants, switchyards, intake, control and diversion structures, wells, pipes, tunnels, cables, other equipment and accessory buildings and structures of similar character and scale, and includes associated drilling, <u>vehicles, infrastructure, machinery</u>, testing, monitoring, earthworks and vegetation removal. Also the extension to existing Buildings and Structures, and the erection of new Buildings and Structures up to 100m² in area and not exceeding the maximum height standard for the Rural Environment and the erection of any aerial, antennae or communication dish not exceeding 5m² in area located on top of a hydro or geothermal existing structure, subject to compliance</p>			

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	with the Noise Performance Standard.			
4b.1.5 Commercial and industrial activities, and home businesses, - OS93.51	Amend Rule 4b.1.5 as follows: ... When considering activities under Rule 4b.1.5ii Council restricts the exercise of its discretion to the following matters: ... c. The effect of the activity on surrounding land uses (<u>including reverse sensitivity effects</u>) and how these effects can be managed onsite and/or mitigated...	The third paragraph should refer to Rule 4b.1.5ii. Home businesses could include sensitive activities and need to avoid creating reverse sensitivity effects.	Support	Manawa Energy supports this submission.
4b.1.7 High voltage transmission lines - OS93.52	Amend Rule 4b.1.7 as follows: 4b.1.7 Buildings and Structures in proximity to High voltage transmission lines i. Any building <u>or structure</u> (except network utilities and <u>Renewable Electricity Generation Activities</u>) located within 0 – 12 meters of a high-voltage transmission line is a restricted discretionary activity .	Contact supports this rule as it seeks to ensure the safe operation of transmission lines. However, the heading of the rule needs to be more accurate. In addition to network utilities, this rule should also provide an exception for renewable electricity generation activities (which are not necessarily network utilities).	Support	Manawa Energy supports this submission.
4b.1.8 Buildings within Outstanding Landscape Areas - OS93.53	Retain Rule 4b.1.8 but amend the first exception to the rule as follows: EXCEPTION: This rule will not apply to the erection of structures:	Contact supports this rule on the basis that it does not apply to buildings within Electricity Generation Core Sites, but there is no reason why it should not apply to all other	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	a. <u>Associated with existing renewable electricity generation activities including W</u> within Electricity Generation Core Sites. b. ...	existing renewable electricity generation activities.		
4b.1.9 Earthworks within Outstanding Landscape Areas - OS93.54	Retain 4b.1.9 but amend the exception as follows: EXCEPTION: This rule will not apply to Earthworks <u>associated with existing and/or consented renewable electricity generation activities including</u> within Electricity Generation Core Sites.	Contact supports this rule on the basis that it does not apply to earthworks within Electricity Generation Core Sites, but there is no reason why it should not apply to all other existing renewable electricity generation activities.	Support	Manawa Energy supports this submission.
4b.2.1 Vehicle movements - OS93.55	Retain 4b.2.1 but amend the exception as follows: EXCEPTION: This performance standard shall not apply to traffic movements involved in forest harvesting operations <u>or existing and consented renewable electricity generation activities.</u>	Contact supports Rule 4b.2.1 subject to the exception being expanded to include renewable electricity generation activities.	Support	Manawa Energy supports this submission.
4b.2.5 Maximum building height - OS93.56	Amend Rule 4b.2.5 as follows: 4b.2.5 Maximum building height ... iv. 15 meters for <u>renewable Electricity Generation activities</u>	Contact seeks amendments to Rule 4b.2.5 to make the rule applicable to all renewable electricity generation activities within Geothermal Areas. An additional exception has	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p>on land identified as a Geothermal Area in Section O within an Electricity Generation Core Site.</p> <p>EXCEPTIONS:</p> <ul style="list-style-type: none"> · <u>activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators including wind monitoring masts – no height limit</u> · ... · Drilling Rigs for up to 60 days per well allotment – no height limit. 	<p>been added to the rule on the basis that Policy G of NPS-REG</p>		
4b.2.6 Minimum building setbacks - OS93.57	<p>Amend Rule 4b.2.6 as follows:</p> <p>4b.2.6 Minimum building setbacks</p> <p>i....</p> <p>v. There shall be no front boundary setback for buildings and activities associated with Electricity Generation and Renewable Energy <u>Electricity Generation Activities</u> on land identified as Geothermal Area in Section O within an Electricity Generation Core Site where the road extends over any power generation Building or Structure.</p> <p>vi. There shall be no boundary</p>	<p>Contact seeks minor amendments to Rule 4b.2.6 to make it more accurate and workable.</p>	Support	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	setback for buildings and activities associated with <u>Renewable Electricity Generation Activities</u> on land identified as Geothermal Area in Section O <u>including</u> within an Electricity Generation Core Site...			
4b.2.7 Minor residential units - OS93.58	Amend Rule 4b.2.7 as follows: 4b.2.7 Minor residential units ... i. All minor residential <u>units</u> or accommodation activity units shall: a. ... c. <u>Be located no closer than the existing primary residential unit on the same site to a Consent Area which is the subject of resource consents issued by the Waikato Regional Council for the take or discharge of geothermal fluid exceeding 1,000 tonnes per day provided that this clause shall not apply to properties more that 300m away from any aforementioned Consent Area....</u>	Minor residential units need to be located so that they do not create additional restrictions on renewable electricity generation activities by, for example, moving a point of noise compliance closer to the source of noise.	Support	Manawa Energy supports this submission.
4b.2.8 Commercial and industrial activities, and home businesses - OS93.59	Amend Rule 4b.2.8 as follows: 4b.2.8 Commercial and industrial activities, and home businesses i. ... iii. <u>Home businesses shall be</u>	Home businesses need to be located so that they do not create additional restrictions on renewable electricity generation activities.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p><u>located no closer than the existing primary residential unit on the same site to a Consent Area which is the subject of resource consents issued by the Waikato Regional Council for the take or discharge of geothermal fluid exceeding 1,000 tonnes per day provided that this clause shall not apply to properties more that 300m away from any aforementioned Consent Area...</u></p>			
4b.2.9 Maximum Noise – Limits - OS93.60	Retain	Contact supports this rule.	Support	Manawa Energy supports this submission.
4b.2.10 Maximum Noise - Construction Noise - OS93.61	Retain	Contact supports this rule.	Support	Manawa Energy supports this submission.
4b.2.11 Maximum Noise - Electricity Generation Core Sites - OS93.62	Retain	Contact supports this rule.	Support	Manawa Energy supports this submission.
4b.2.12 Maximum Noise - Well Drilling and Testing - OS93.63	Retain	Contact supports this rule.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.2.13 Maximum Noise – Other - OS93.64	Amend Rule 4b.2.13 as follows: 4b.2.13 Maximum Noise – Other ... ii. Nothing in the foregoing Performance Standards shall apply to sirens, circuit breakers, <u>bursting discs, emergency or upset operating conditions</u> and hydro spills associated with the operation of <u>Renewable Electricity Generation Activities Core sites</u> . Provided that the activity shall comply with the requirements of S16 of the Resource Management Act 1991.	Contact supports this rule subject to minor amendments to ensure it applies to all applicable circumstances.	Support	Manawa Energy supports this submission.
4b.2.14 Parking, Loading and Access - OS93.65	Delete Rule 4b.2.14.	Taupo District is a Tier 3 territorial authority. The NPS-UD sets out that tier 1, 2 and 3 territorial authorities must remove district plan rules, assessment criteria, policies and objectives that have the effect of setting minimum car parking rates as soon as practicable, no more than 18 months from the date of commencement of the NPS-UD.	Support	Manawa Energy supports this submission.
4b.2.15 Signage - OS93.66	Retain Rule 4b.2.15.	Contact supports this rule.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.5.1 Subdivision - General Rural Environment - OS93.67	Retain Rule 4b.5.1 subject to an additional matter of control as set out in Rule 4b.5.3.	Contact supports this rule subject to an additional matter of control as set out in Rule 4b.5.3.	Support	Manawa Energy supports this submission.
4b.5.2 Subdivision - Rural Lifestyle Environment that adjoins the General Rural Environment - OS93.68	Contact supports this rule subject to an additional matter of control as set out in Rule 4b.5.3.	Retain Rule 4b.5.2 subject to an additional matter of control as set out in Rule 4b.5.3.	Support	Manawa Energy supports this submission.
4b.5.3 Subdivision - Rural Lifestyle Environment that does not adjoin the General Rural Environment - OS93.69	Amend Rule 4b.5.3 as follows: ...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: ... i) <u>Any effects on the functioning of the Rural Environment including adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources.</u>	Contact supports this rule with the inclusion of an additional matter over which control is reserved for controlled activities.	Support	Manawa Energy supports this submission.
4b.5.4 Subdivision - Default Activity Status - OS93.70	Retain Rule 4b.5.4.	Contact supports this rule.	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
4b.5.5 Subdivision resulting in a new public road, or extension of existing public road - OS93.71	Retain Rule 4b.5.5.	Contact supports this rule.	Support	Manawa Energy supports this submission.
4b.5.6 Subdivision – Other - OS93.72	Retain Rule 4b.5.6	Contact supports this rule.	Support	Manawa Energy supports this submission.
4b.5.7 Subdivision - Outstanding Landscape Areas – Other - OS93.73	Retain Rule 4b.5.7.	Contact supports this rule.	Support	Manawa Energy supports this submission.
4b.5.8 Subdivision - Bonus Lots - OS93.74	Retain Rule 4b.5.8.	Contact supports this rule.	Support	Manawa Energy supports this submission.
4b.5.9 Subdivision - More than 12 allotments - OS93.75	Retain Rule 4b.5.9.	Contact supports this rule.	Support	Manawa Energy supports this submission.
Planning Maps - OS93.76	Delete the proposed Rural Lifestyle Environment on Centennial Drive and retain the current Rural Environment (General Rural Environment). View full submission bundle for map.	Contact opposes the rezoning of land on Centennial Drive to Rural Lifestyle Environment. Existing land use character is a relevant factor when determining land use zoning, but it is not necessarily determinative of the outcome. There are a range other factors that need to be taken into	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
		<p>account. A Rural Lifestyle Environment in this location would reinforce the ongoing existence, and enable the intensification, of rural residential activities which are incompatible with the nature and character of the surrounding environment. The Centennial Drive area is vitally important for enabling large scale industrial activities, noisy recreationally activities, and the utilisation of the Wairakei-Tauhara Geothermal System for renewable electricity generation purposes (the latter being a matter of national significance as recognised in the NPS for Renewable Electricity Generation). This area should not be compromised by an ability to increase and/or intensify the establishment of incompatible rural residential activities.</p>		
<p>Amendments to the Definitions of the Taupo District Plan Section 10 - OS93.78</p>	<p>Insert a new definition of reverse sensitivity (being the definition in the Waikato RPS) as follows: Reverse sensitivity is the <u>vulnerability of a lawfully established activity to a new activity or land use. It arises when a lawfully established activity causes potential, actual or perceived</u></p>	<p>Due to the nature of the following submissions by Contact, two additional definitions need to be included in the Taupo District Plan.</p>	<p>Support</p>	<p>Manawa Energy supports this submission.</p>

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<p><u>adverse environmental effects on the new activity, to a point where the new activity may seek to restrict the operation or require mitigation of the effects of the established activity.</u></p>			
Planning Maps - OS93.79	Delete the parts of the proposed Rural Lifestyle Environment at 146, 122, 104 Oruanui Road, and retain the current Rural Environment (General Rural Environment).	Contact opposes the rezoning of parts of the land on Oruanui Road to Rural Lifestyle Environment. A Rural Lifestyle Environment in this location would reinforce the ongoing existence, and enable the intensification, of rural residential activities which are incompatible with the nature and character of the surrounding environment to the south which includes Te Mihi Power Station and associated steamfield activities. Additional wells are planning to be drilled in the area to the north of Te Mihi Power Station in accordance with resource consents held by Contact.	Support	Manawa Energy supports this submission.
Planning Maps - OS93.80	Delete the part of the proposed Rural Lifestyle Environment at 2 Caroline Drive, which extends along SH5. View full submission for map.	Contact opposes the rezoning of part of the land on Napier Road (known as Bonshaw Park) to Rural Lifestyle Environment. Specifically, Contact opposes the additional 'leg' of land extending to the west of Bonshaw	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
		Park along the Napier Road frontage. Contact recognised the 'sensitive' nature of Bonshaw Park as part of consenting the Tauhara Geothermal Development. The outcome includes a 100m setback from Bonshaw Park for surface activities undertaken by Contact.		
Planning Maps - OS93.81	Delete the parts of the proposed Rural Lifestyle Environment at 21, 41, 61, 194 and 196 and Tukairangi Road and 437 Poihipi Road and retain the current Rural Environment (General Rural Environment).	Contact opposes the rezoning of part of the land on Tukairangi Road to Rural Lifestyle Environment. A Rural Lifestyle Environment in this location would reinforce the ongoing existence, and enable the intensification, of rural residential activities which are incompatible with the nature and character of the surrounding environment to the north and east which includes Poihipi Power Station and associated steamfield activities.	Support	Manawa Energy supports this submission.
LWAG – Jane Penton				
4b Rural Environment - OS101.7	LWAG 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	LWAG 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	Oppose	Manawa Energy opposes this submission, as provision needs to be made for infrastructure and activities that have a functional requirement to be located in these areas.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	close proximity to , restricted or controlled access, vegetation enhancement and management, erosion control.	close proximity to , restricted or controlled access, vegetation enhancement and management, erosion control.		
4b Rural Environment - OS101.8	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. LWAG ask that the provisions ensure that the N restrictions apply to land use in the rural lifestyle zone.	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. '	Oppose	Manawa Energy opposes this submission, as provision needs to be made for infrastructure and activities that have a functional requirement to be located in these areas.
Edison Consulting Group – Time Lester				
Objective 3b.2.4 Other activities - OS106.15	The submitter seeks the following amendment to Proposed Objective 3b.2.4: <i>Maori cultural activities, tourism activities, visitor accommodation and renewable electricity generation and transmission (including sub</i>	The submitter consider it appropriate to include a reference to sub transmission activities so as to avoid confusion with the electricity transmission function of Transpowers National Grid network. The sub transmission network includes high-voltage lines of 11kV and 33kV, which	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<i>transmission) activities are enabled in the General Rural Environment.</i>	are common features within the Rural Environment.		
Policy 3b.2.13 Avoiding reverse sensitivity - OS106.17	The submitter seeks that Policy 3b.2.13 is retained as current drafted "Any adverse effects generated by an activity must be managed within the allotment so as to avoid adversely affecting permitted and lawfully established neighbouring activities."	The submitter supports this policy in relation to the safe and efficient operation of the distribution network located with the district's rural environment. Examples of activities that could have an adverse effect could relate to earthworks, and the potential effects such soil disturbance could have on support structures or in relation to maintaining clearance to lines through site contouring.	Support	Manawa Energy supports this submission.
Objective 3b.3.2 Avoid reverse sensitivity - OS106.18	The submitter seeks that Objective 3b.3.2 is retained as current drafted.	The submitter support the protection for rurally located electricity distribution network from the adverse effects of reverse sensitivity. Supportive of the word "avoided" as it sends a strong message of the need to manage reverse sensitivity effects.	Support	Manawa Energy supports this submission.
Transpower NZ – Trudi Burney				
Amendments to the Definitions of the Taupo District Plan Section 10 -	Add the following definition: NATIONAL GRID has <u>the same meaning as provided in</u>	Transpower requests the inclusion of a definition for the National Grid, to support amendments requested by	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
OS110.1	<u>the National Policy Statement on Electricity Transmission 2008.</u>	Transpower that incorporate this term into the strategic directions.		
Amendments to the Definitions of the Taupo District Plan Section 10 - OS110.2	Add new definition for 'regionally significant infrastructure' and include the 'National Grid' within this definition.	These terms are used in the Strategic Directions chapter but are not defined in Plan Change 38 nor in the operative District Plan. The introductory text in 2.5 Strategic Direction 5 refers to various types of infrastructure but does not clearly delineate between regionally significant and nationally significant infrastructure, nor whether any infrastructure is classified as neither of these. Definitions are required so that the intention and application of the strategic direction objectives are clear.	Support	Manawa Energy supports this submission.
3b Rural Environment Chapter - OS110.13	Delete references to the National Grid from the Rural Environment chapter and introduce a new district-wide Infrastructure/Network Utilities chapter.	Transpower seeks the introduction of a specific framework that manages effects of and on the National Grid, and gives effect to the NPSET. Transpower requests that new district-wide provisions are introduced, and provides suggested objectives, policies and rules in Appendix A to this submission. If Council chooses not to introduce the framework in Appendix A district-wide, Transpower seeks amendments	Support	Manawa Energy supports this submission, the Council should be providing for all NPS documents and implementing the National Planning Standards.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
		to the Rural Environment chapter as outlined in following submission points.		
3b.1 Introduction - OS110.14	Amend introduction as follows: <i>Other activities that are anticipated in the Rural Environment are tourism activities, visitor accommodation and renewable electricity generation and transmission. It is important that all such activities do not affect the ability of the rural environment to function effectively, <u>recognising that some activities have specific locational or operational needs that must be accommodated...</u></i>	Transpower requests amendments to the introductory text to reflect that electricity transmission activities should not be constrained by the function of the rural environment, and that the National Grid has functional or operational need to be in particular locations. While it is unlikely that the presence of National Grid infrastructure would create constraints on rural function, these amendments would ensure consistency with the direction of the NPSET.	Support	Manawa Energy supports this submission.
Radio NZ – Annabelle Lee – Chapman Trip				
4b.2.9 Maximum Noise – Limits - OS112.9	The following wording is suggested for an exemption: <i><u>x. The use of generators and mobile equipment (including vehicles) for emergency purposes, including testing and maintenance not exceeding 48 hours in duration, where they are operated by</u></i>	RNZ seeks an exemption from noise rules for the use of generators for emergency purposes by lifeline utilities. On the rare occasions the portable generator at RNZ's Facilities is used during scheduled or extensive power outages, it makes a certain amount of noise. As a lifeline utility it is critical RNZ can continue to use to	Support	Manawa Energy supports this submission.

Submission Number	Decision Sought	Submission summary	Support or Oppose	Reason for Support or Opposition
	<u>emergency services or lifeline utilities;</u>	ensure uninterrupted operations during emergencies.		
Taupo Climate Change Action Group – Alana Delich				
4b Rural Environment - OS114.13	The submitter 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.	The submitter considers that identification and protection of natural gullies in the General Rural and Proposed Rural Lifestyle should be mandatory for all development in the district.	Oppose	Manawa Energy opposes this submission, as provision needs to be made for infrasture and activities that have a functional requirement to be located in these areas.



First name: Hayley
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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:

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 that activities 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.

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 (46.10) 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 - 46.10. 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 - 46.10. 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 46.10. 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 has 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-E. This should however not be limited to NPS-E 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	<p>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.</p>	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	<p>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).</p>	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



First name: Alice
Last name: Lin
Postal address: PO Box 90477, Victoria Street West
Suburb:
City: Auckland
Country: New Zealand
Postcode: 1142
Email: Alice.Lin@genesisenergy.co.nz

Daytime Phone: 02102211943

- 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

Original Submitter: #91 Colin Guyton (Unknown, New Zealand, Unknown)
Original Point: #91.6 2.5 Strategic Direction 5 Significant and Local Infrastructure

Points: FS215.1

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

The proposed addition appears to misinterpret the concept of reverse sensitivity and is therefore opposed. Any adverse effect arising from new infrastructure on an existing land use activity would be a direct adverse effect on the existing land use, which requires an assessment of the effect in accordance with the RMA. This is already recognized in 2.5.3 Policy 5.

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

Reject the relief sought by the submitter.

Original Submitter: #114 Alana Delich (72 Hinemoa Avenue, Taupo, New Zealand, 3330)

Original Point: #114.18 2.4.2 Objective

Points: FS215.2

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Amendments to support a reduction in greenhouse gas emissions are supported insofar as any amendments recognise the significance of renewable electricity generation within the District and is consistent with the original submission by Genesis.

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

Accept the relief sought insofar as it recognises the role of renewable electricity generation within the District and is consistent with the original submission by Genesis.

Original Submitter: #110 Trudi Burney (31 Gilberthorpes Road, Islington, Christchurch, New Zealand, 8042)

Original Point: #110.3 2.5 Strategic Direction 5 Significant and Local Infrastructure

Points: FS215.3

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Genesis supports the inclusion of an appropriate definition for 'nationally significant infrastructure' provided the definition includes existing power station sites, and their associated infrastructure and ancillary 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

Accept the relief sought by the submitter subject to the definition including the existing power station sites, and associated infrastructure and ancillary activities.

Original Submitter: #110 Trudi Burney (31 Gilberthorpes Road, Islington, Christchurch, New Zealand, 8042)

Original Point: #110.6 2.5.3 Policy

Points: FS215.4

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Genesis supports the inclusion of appropriate definitions for 'nationally significant infrastructure' and 'regionally significant

infrastructure' provided the definitions include existing power station sites, and their associated infrastructure and ancillary 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

Accept the relief sought by the submitter subject to the definition including the existing power station sites, and associated infrastructure and ancillary activities.

Original Submitter: #110 Trudi Burney (31 Gilberthorpes Road, Islington, Christchurch, New Zealand, 8042)

Original Point: #110.7 2.5.3 Policy

Points: FS215.5

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Genesis' original submission sought to retain the existing wording in Policy 3. Genesis supports the reference to not 'compromise' the effective and safe functioning of infrastructure but considers it is important to retain the reference to reverse sensitivity effects.

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

Accept the relief to include reference to not 'compromise' the effective and safe functioning of infrastructure but retain the reference to reverse sensitivity effects.

Original Submitter: #112 Annabelle Lee (Unknown, New Zealand, Unknown)

Original Point: #112.1 2.5 Strategic Direction 5 Significant and Local Infrastructure

Points: FS215.6

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Genesis supports the inclusion of the definition for 'regionally significant infrastructure' as contained in the Waikato RPS.

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

Accept the relief sought.

Original Submitter: #59 Alice Hall (Unknown, New Zealand, Unknown)

Original Point: #59.9 2.3.3 Policy

Points: FS215.7

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Genesis is opposed to the proposed softening of the policy that only requires conflict on existing uses and reverse sensitivity effects to be 'considered'.

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**

Reject the relief sought and retain Policy 10 subject to the relief sought by Genesis in its primary submission.

Original Submitter: #98 Alice Hall (Unknown, New Zealand, Unknown)**Original Point:** #98.9 2.3.3 Policy**Points: FS215.8****Do you support or oppose the original submission point/submission?*****Please state the reasons for your support/opposition:*****Oppose**

Genesis is opposed to the proposed softening of the policy that only requires conflict on existing uses and reverse sensitivity effects to be 'considered'.

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**

Reject the relief sought and retain 2.3.3 Policy 10 subject to the relief sought by Genesis in its primary submission.

Original Submitter: #89 Ashiley Sycamore (Private Bag 3072, Waikato Mail Centre, Hamilton, New Zealand, 3240)**Original Point:** #89.1 Plan Change 38 - Strategic Directions**Points: FS215.9****Do you support or oppose the original submission point/submission?*****Please state the reasons for your support/opposition:*****Oppose**

Genesis considers the relief sought is beyond the scope of the Plan Change.

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**

Reject the relief sought by the submitter.

Original Submitter: #89 Ashiley Sycamore (Private Bag 3072, Waikato Mail Centre, Hamilton, New Zealand, 3240)**Original Point:** #89.2 Plan Change 38 - Strategic Directions**Points: FS215.10****Do you support or oppose the original submission point/submission?*****Please state the reasons for your support/opposition:*****Support**

Genesis' primary submission includes a proposed new policy in Natural Environment Values 2.6.3 Policy to recognize the benefits of offset measures and compensation, and to provide for their use as feasible alternatives to manage significant residual adverse effects of renewable electricity generation activities and Regionally Significant Infrastructure.

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**

Accept the relief sought subject to the relief sought by Genesis in its primary submission.

Original Submitter: #89 Ashiley Sycamore (Private Bag 3072, Waikato Mail Centre, Hamilton, New Zealand, 3240)**Original Point:** #89.7 2.3.3 Policy**Points: FS215.11****Do you support or oppose the original submission point/submission?*****Please state the reasons for your support/opposition:*****Oppose**

Genesis opposes the use of absolute language of 'avoid' in relation to subdivision and development in areas with important natural and landscape values, as any development in these areas can be assessed on merit.

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**

Reject the relief sought by the submitter.

Original Submitter: #22 Penny Cairns (PO Box 20176, Bishopdale, Christchurch, New Zealand, 8543)**Original Point:** #22.23 Chapter 2 Strategic Directions**Points: FS215.12****Do you support or oppose the original submission point/submission?*****Please state the reasons for your support/opposition:*****Oppose**

Genesis is not opposed if a new strategic direction is sought to manage issues for the rural environment. However, the rural environment includes several existing strategic infrastructure that are regionally and/or nationally significant, which have a functional and/or operational need to be located in the rural environment. If a new strategic direction is to be set for the rural environment, it must be inclusive of all rural industry that have a functional and/or operational need to be located in the rural environment, which is not just primary production 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:*****Disallow**

Reject the relief sought by the submitter unless the new strategic direction adequately provides for all activities that have a strategic need to be located in the District.

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)**Original Point:** #26.59 Plan Change 38 - Strategic Directions**Points: FS215.13****Do you support or oppose the original submission point/submission?*****Please state the reasons for your support/opposition:*****Oppose**

Genesis is not opposed if a new strategic direction is sought to provide for primary production activities and protect highly productive land from inappropriate developments. However, the rural environment includes several existing strategic

infrastructure that are regionally and/or nationally significant, which have a functional and/or operational need to be located in the rural environment. If a new strategic direction is to be set, it must be inclusive of all rural industry that have a functional and/or operational need to be located in the rural environment, which is not just primary production 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:

Disallow

Reject the relief sought by the submitter unless the new strategic direction adequately provides for all activities that have a strategic need to be located in the District.

Original Submitter: #29 Megan Kettle (Unknown, New Zealand, Unknown)

Original Point: #29.10 2.5 Strategic Direction 5 Significant and Local Infrastructure

Points: FS215.14

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

The relief sought is consistent with the relief sought by Genesis' original submission.

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

Accept the relief sought by the submitter insofar as it is consistent with the original submission by Genesis.

Original Submitter: #58 Charlotte Muggeridge (Unknown, New Zealand, Unknown)

Original Point: #58.1 Plan Change 38 - Strategic Directions

Points: FS215.15

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Genesis opposes the proposal to establish a hierarchy on the order of the Strategic Directions. Strategic directions are key resource management matters for the district and are considered in the same light without any priority. It is therefore inappropriate to establish a hierarchy as suggested.

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

Reject the relief sought by the submitter.

Original Submitter: #115 George Asher (Unknown, New Zealand, Unknown)

Original Point: #115.33 2.5.3 Policy

Points: FS215.16

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Genesis considers the recognition of the wider benefits of renewable electricity generation should be retained in the 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**

Reject the relief sought and retain 2.5.3 Policy 1 subject to the relief sought by Genesis in its primary submission.

Original Submitter: #22 Penny Cairns (PO Box 20176, Bishopdale, Christchurch, New Zealand, 8543)**Original Point:** #22.8 Objective 3b.2.5 Avoidance of reverse sensitivity**Points: FS215.17****Do you support or oppose the original submission point/submission?*****Please state the reasons for your support/opposition:*****Oppose**

The amendments sought are opposed insofar as they would exclude other activities including existing (lawfully established) industrial activities and large-scale recreational activities that are also located within the Rural Environment (including power stations).

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**

Reject the relief sought by the submitter and adopt the relief sought by Genesis' primary submission.

Original Submitter: #22 Penny Cairns (PO Box 20176, Bishopdale, Christchurch, New Zealand, 8543)**Original Point:** #22.9 Policy 3b.2.9 Maintaining the established character**Points: FS215.18****Do you support or oppose the original submission point/submission?*****Please state the reasons for your support/opposition:*****Oppose**

The amendments sought are opposed insofar as they would exclude effects associated with other activities including existing (lawfully established) industrial activities and large-scale recreational activities that are also located within the Rural Environment (including power stations). These activities are located within the Rural Environment and form part of the existing character.

Effects should not be limited to primary production 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:*****Disallow**

Reject the relief sought by the submitter and adopt the relief sought by Genesis' primary submission.

Original Submitter: #22 Penny Cairns (PO Box 20176, Bishopdale, Christchurch, New Zealand, 8543)**Original Point:** #22.11 Policy 3b.2.13 Avoiding reverse sensitivity**Points: FS215.19****Do you support or oppose the original submission point/submission?*****Please state the reasons for your support/opposition:*****Oppose**

The amendments sought are opposed insofar as they do not require sensitive activities to be separated from existing (lawfully

established) industrial activities and large-scale recreational activities that are also located within the Rural Environment (including power stations).

The amendments sought do not afford any consideration of reverse sensitivity effects with respect to these existing land use activities.

Consideration of reverse sensitivity effects should not be limited to primary production 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:

Disallow

Reject the relief sought by the submitter and adopt the relief sought by Genesis' primary submission.

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)

Original Point: #26.15

Points: FS215.20

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

To ensure consistency, Genesis considers the existing definition in the Waikato RPS should be used.

Reverse sensitivity is defined as:

"Is the vulnerability of a lawfully established activity to a new activity or land use. It arises when a lawfully established activity causes potential, actual or perceived adverse environmental effects on the new activity, to a point where the new activity may seek to restrict the operation or require mitigation of the effects of the established activity."

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

Accept the relief sought by the submitter in part subject to the definition in the Waikato RPS being adopted.

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)

Original Point: #26.20 Objective 3b.2.1 Enable Primary Production

Points: FS215.21

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Genesis considers the existing objectives and policies are already comprehensive to capture primary production activities without the need for a further objective.

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

Reject the relief sought by the submitter.

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)

Original Point: #26.25 Policy 3b.2.9 Maintaining the established character

Points: FS215.22

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

The amendments proposed by the submitter are inconsistent with the relief sought in the original submission by Genesis.

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

Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Genesis.

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)

Original Point: #26.27 Policy 3b.2.9 Maintaining the established character

Points: FS215.23

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Genesis supports the adoption of a new policy to avoid incompatible land use activities establishing within the Rural Environment provided the wording of the proposed policy is consistent with the National Policy Statement of Highly Productive Land and does not preclude renewable electricity generation activities from establishing within a Rural Environment.

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

Accept the relief sought by the submitter subject to amendments that ensure the proposed wording is consistent with the National Policy Statement of Highly Productive Land and does not preclude renewable electricity generation activities from establishing within a rural environment.

Original Submitter: #26 Sarah Cameron (PO Box 10232, Wellington, New Zealand, 6140)

Original Point: #26.29 Policy 3b.2.13 Avoiding reverse sensitivity

Points: FS215.24

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

The suggested wording only refers to reverse sensitivity effects on primary production activities, and therefore excludes other existing lawfully established activities (including power stations) within the Rural Environment, and for which reverse sensitivity is still relevant.

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

Reject the relief sought by the submitter.

Original Submitter: #35 Patrick Edwards (PO Box 740, Taupo, New Zealand, 3351)

Original Point: #35.11 4b.1.5 Commercial and industrial activities, and home businesses, **Points: FS215.25**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Genesis notes there may be industrial activities which may have a functional need to be located in the rural environment. Accordingly Genesis considers the current rule is appropriate to provide for those activities that meet the relevant performance standards.

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

Reject the relief sought insofar as it is inconsistent with the original submission by Genesis.

Original Submitter: #91 Colin Guyton (Unknown, New Zealand, Unknown)

Original Point: #91.12 3b.2 Objectives and Policies - General Rural Environment

Points: FS215.26

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Genesis considers the scope of the objective would be narrowed significantly, and uncertainty of outcomes would surround use of the term 'essential infrastructure' without offering a definition of such.

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

Reject the relief sought by the submitter.

Original Submitter: #91 Colin Guyton (Unknown, New Zealand, Unknown)

Original Point: #91.20 4b.5.1 Subdivision - General Rural Environment

Points: FS215.27

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Genesis' primary submission sought for an additional matter to be included as an assessment matter in rural subdivision. In particular, the adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources must be assessed. Subdivision of rural properties to smaller lot sizes should only be permitted subject to the additional assessment being required.

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

Accept in the relief subject to Genesis' primary submission being accepted.

Original Submitter: #96 Carolyn McAlley (Unknown, New Zealand, Unknown)
Original Point: #96.8 3b.2 Objectives and Policies - General Rural Environment

Points: FS215.28

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

The submission offers no qualifiers to the effects to be managed such that any effect must be avoided. The use of absolute terms is opposed.

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

Reject the relief as sought by the submitter.

Original Submitter: #96 Carolyn McAlley (Unknown, New Zealand, Unknown)
Original Point: #96.9 3b.3 Objectives and Policies - Rural Lifestyle Environment

Points: FS215.29

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

The submission offers no qualifiers to the effects to be managed such that any effect must be avoided. The use of absolute terms is opposed.

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

Reject the relief as sought by the submitter.

Original Submitter: #109 Graeme Mathieson (PO Box 97431, Manukau City, Auckland, New Zealand, 2241)
Original Point: #109.1 Amendments to the Definitions of the Taupō District Plan Section 10 **Points: FS215.30**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Genesis' primary submission seeks amendment to the definition of 'rural industry' that relies in turn on acceptance of new definitions for 'Renewable Electricity Generation' and '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

Accept the relief sought by the submitter insofar as it is consistent with the original submission by Genesis.

Original Submitter: #110 Trudi Burney (31 Gilberthorpes Road, Islington, Christchurch, New Zealand, 8042)

Original Point: #110.2 Plan Change 38 - Strategic Directions

Points: FS215.31

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

'Regionally significant infrastructure' is a defined term in the Waikato Regional Policy Statement. This is preferred and in Genesis' view should be retained for sake of consistency.

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

Accept relief in part insofar as renewable electricity generation activities are include in any amended definition of regionally significant infrastructure.

Original Submitter: #110 Trudi Burney (31 Gilberthorpes Road, Islington, Christchurch, New Zealand, 8042)

Original Point: #110.8 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points:** FS215.32

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Genesis' primary submission sought amendments to the definition of 'rural industry' subject to new definitions being included for 'renewable electricity generation' and 'renewable electricity generation activities'. Genesis is not opposed to the definition of 'rural industry' being consistent with the National Planning Standards provided the new definitions as outlined in its original submission are included.

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

Accept the relief sought by the submitter insofar as it is consistent with the original submission by Genesis.

Original Submitter: #110 Trudi Burney (31 Gilberthorpes Road, Islington, Christchurch, New Zealand, 8042)

Original Point: #110.13 3b Rural Environment Chapter

Points: FS215.33

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Genesis supports the inclusion of a new Infrastructure/Network Utilities chapter. If a new chapter is to be considered, renewable electricity generation activities would also need to be included.

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

Accept the relief sought to include a new Infrastructure/Network Utilities chapter. Alternatively, accept the relief to delete references to the National Grid from the General Rural Environment chapter insofar as the proposed amendments still provide for the functioning and operation of infrastructure within the General Rural Environment.

Original Submitter: #113 Luke Braithwaite (PO Box 13055, Tauranga Central, Tauranga, New Zealand, 3141)

Original Point: #113.9 4b.2 Performance Standards - General Rural Environment

Points: FS215.34

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

There are activities in the General Rural Environment which rely on 24-hour operation where lighting may be an operational and safety requirement.

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

Reject the relief sought.

Original Submitter: #116 Bryce David McGrath (1281 Mapara Road, RD 5, Taupo, New Zealand, 3385)

Original Point: #116.8 3b.2 Objectives and Policies - General Rural Environment

Points: FS215.35

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Genesis considers accepting this submission would potentially allow a proliferation of lifestyle blocks including in inappropriate locations.

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

Reject the relief sought by the submitter.

Attached Documents

File
230406 Taupo PC38 and 42 Genesis Energy further submission



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Auckland 1142
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6 April 2023

Taupo District Council
30 Tongariro Street
TAUPO 3330

By email: districtplan@taupo.govt.nz

Submission on Plan Changes 38 and 43 to the Taupō District Plan

Genesis Energy Ltd (**Genesis, Submitter #84**) makes the specific further submissions on the Proposed Plan Changes 38 (**PC38**) and 42 (**PC42**) to the Taupō District Plan, as set out in the attached tables.

In accordance with Clause 8(1)(b) of the First Schedule of the Resource Management Act 1991, Genesis has an interest in the Proposed Plan Changes that is greater than the interest of the general public. Specifically, Genesis owns and operates the Tongariro Power Scheme (**TPS**), which is a regionally and nationally significant infrastructure providing renewable electricity supply. Genesis' submissions on PC38 and PC42 are focused on ensuring the ongoing operation or future development options (at the TPS and new opportunities) are not compromised.

Genesis wishes to be heard in support of this submission.

Genesis could not gain an advantage in trade competition through this submission.

If others make a similar submission, Genesis will consider presenting a joint case with them at any hearing.

If you have any queries in relation to this feedback, please contact Alice Lin on email Alice.Lin@genesisenergy.co.nz or phone 021 022 11 943.

Nakū noa, nā

A handwritten signature in blue ink that reads "Karen Sky".

Karen Sky
Group Manager Environment and Community

Further Submissions on Plan Change 38 – Strategic Directions					
Sub #	Submitter	Provision and relief sought by submitter Deletion strikethrough. <u>Addition underlined.</u>	Genesis Support / Oppose	Reason for further submission	Genesis relief sought
OS91.6	Federated Farmers of NZ	2.5.3 Policy Addition to Policy 2.5.3 of a new clause to read as below or with wording to similar effect: <u>6. To recognise the reverse sensitivity effects infrastructure may have on existing land use activities and to avoid, remedy or mitigate these effects where possible.</u>	Oppose	The proposed addition appears to misinterpret the concept of reverse sensitivity and is therefore opposed. Any adverse effect arising from new infrastructure on an existing land use activity would be a direct adverse effect on the existing land use, which requires an assessment of the effect in accordance with the RMA. This is already recognized in 2.5.3 Policy 5.	Reject the relief sought by the submitter.
OS114.18	Taupo Climate Action Group	2.4 Strategic Direction 4 Climate Change Amend wording in the climate change strategic direction to 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.	Support in part	Amendments to support a reduction in greenhouse gas emissions are supported insofar as any amendments recognise the significance of renewable electricity generation within the District and is consistent with the original submission by Genesis.	Accept the relief sought insofar as it recognises the role of renewable electricity generation within the District and is consistent with the original submission by Genesis.
OS110.3	Transpower NZ Ltd	2.5 Strategic Direction 5 Significant and Local Infrastructure Include new definition for ‘nationally significant infrastructure’ and include ‘National Grid’ within this definition.	Support in part	Genesis supports the inclusion of an appropriate definition for ‘nationally significant infrastructure’ provided the definition includes existing power station sites, and their associated infrastructure and ancillary activities.	Accept the relief sought by the submitter subject to the definition including the existing power station sites, and associated infrastructure and ancillary activities.
OS110.6	Transpower NZ	2.5.3 Policy	Support	Genesis supports the inclusion of appropriate definitions for ‘nationally	Accept the relief sought by the submitter subject to the definition

Further Submissions on Plan Change 38 – Strategic Directions					
Sub #	Submitter	Provision and relief sought by submitter Deletion strikethrough. <u>Addition underlined.</u>	Genesis Support / Oppose	Reason for further submission	Genesis relief sought
	Ltd	Provide definitions for ‘nationally significant infrastructure’ and ‘regionally significant infrastructure’, and include the National Grid in both definitions.	in part	significant infrastructure’ and ‘regionally significant infrastructure’ provided the definitions include existing power station sites, and their associated infrastructure and ancillary activities.	including the existing power station sites, and associated infrastructure and ancillary activities.
OS110.7	Transpower NZ Ltd	2.5.3 Policy 3 Amend policy as follows: 3. Subdivision, land use and development will not adversely affect (including reverse sensitivity effects) <u>or compromise</u> the effective and safe functioning of infrastructure.	Support in part	Genesis’ original submission sought to retain the existing wording in Policy 3. Genesis supports the reference to not ‘compromise’ the effective and safe functioning of infrastructure but considers it is important to retain the reference to reverse sensitivity effects.	Accept the relief to include reference to not ‘compromise’ the effective and safe functioning of infrastructure but retain the reference to reverse sensitivity effects.
OS112.1	Radio NZ Ltd	2.5 Strategic Direction 5 Significant and Local Infrastructure Include definition for ‘regionally significant infrastructure’ as contained in the Waikato RPS.	Support	Genesis supports the inclusion of the definition for ‘regionally significant infrastructure’ as contained in the Waikato RPS.	Accept the relief sought.
OS59.9	Ryman Healthcare Ltd	2.3.3 Policy 10 Amend the policy as follows: 10 Manage subdivision, use and development of land to ensure that it will not <u>in a way that considers:</u> a. have an adverse effects on the functioning of the environment where it is located, b. unduly conflict with existing activities on adjoining properties,	Oppose	Genesis is opposed to the proposed softening of the policy that only requires conflict on existing uses and reverse sensitivity effects to be ‘considered’.	Reject the relief sought and retain Policy 10 subject to the relief sought by Genesis in its primary submission.

Further Submissions on Plan Change 38 – Strategic Directions					
Sub #	Submitter	Provision and relief sought by submitter Deletion strikethrough. <u>Addition underlined.</u>	Genesis Support / Oppose	Reason for further submission	Genesis relief sought
		<p>c. compromise development consistent with the intent and planned urban built form of the environment where it is located</p> <p>d. give rise to reverse sensitivity effects from existing uses</p>			
OS98.9	Retirement Village Association of NZ Inc	<p>2.3.3 Policy 10 Amend Policy 10 as follows: 10 Manage subdivision, use and development of land to ensure that it will not <u>in a way that considers:</u></p> <p>a. have an adverse effects on the functioning of the environment where it is located,</p> <p>b. unduly conflict with existing activities on adjoining properties,</p> <p>c. compromise development consistent with the intent and planned urban built form of the environment where it is located</p> <p>d. give rise to reverse sensitivity effects from existing uses</p>	Oppose	Genesis is opposed to the proposed softening of the policy that only requires conflict on existing uses and reverse sensitivity effects to be 'considered'.	Reject the relief sought and retain 2.3.3 Policy 10 subject to the relief sought by Genesis in its primary submission.
OS115.33	Te Kotahitanga o Ngati Tuwharetoa	<p>2.5.3 Policy 1 Amend Policy 1 as follows: 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, <u>and security of supply,</u> and</p>	Oppose	Genesis considers the recognition of the wider benefits of renewable electricity generation should be retained in the policy.	Reject the relief sought and retain 2.5.3 Policy 1 subject to the relief sought by Genesis in its primary submission.

Further Submissions on Plan Change 38 – Strategic Directions					
Sub #	Submitter	Provision and relief sought by submitter Deletion strikethrough. <u>Addition underlined.</u>	Genesis Support / Oppose	Reason for further submission	Genesis relief sought
		social, and economic wellbeing of people and communities and for their health and safety.			
OS89.1	Department of Conservation	Strategic Directions Update the Strategic Directions chapter to give effect to the NPS-IB exposure draft.	Oppose	Genesis considers the relief sought is beyond the scope of the Plan Change.	Reject the relief sought by the submitter.
OS89.2	Department of Conservation	Strategic Directions In the Natural Environmental Values section, include an objective and/or policy in relation to biodiversity offsetting and biodiversity compensation.	Support in part	Genesis' primary submission includes a proposed new policy in Natural Environment Values 2.6.3 Policy to recognize the benefits of offset measures and compensation, and to provide for their use as feasible alternatives to manage significant residual adverse effects of renewable electricity generation activities and Regionally Significant Infrastructure.	Accept the relief sought subject to the relief sought by Genesis in its primary submission.
OS89.7	Department of Conservation	2.3.3 Policy 12 Amend Policy 12 as follows: 12. Do not support <u>Avoid</u> subdivision and development which will inappropriately affect heritage sites or areas of important natural and landscape values.	Oppose	Genesis opposes the use of absolute language of 'avoid' in relation to subdivision and development in areas with important natural and landscape values, as any development in these areas can be assessed on merit.	Reject the relief sought by the submitter.
OS22.23	NZ Pork Industry Board	Strategic Directions Create a new strategic direction, objectives and policies to outline key strategic and significant resource management issues for the rural environments within the District as	Oppose in part	Genesis is not opposed if a new strategic direction is sought to manage issues for the rural environment. However, the rural environment includes several existing strategic	Reject the relief sought by the submitter unless the new strategic direction adequately provides for all activities that have a strategic need to be located in the District.

Further Submissions on Plan Change 38 – Strategic Directions					
Sub #	Submitter	Provision and relief sought by submitter Deletion strikethrough. <u>Addition underlined.</u>	Genesis Support / Oppose	Reason for further submission	Genesis relief sought
		<p>follows:</p> <p><u>Social and Economic Wellbeing</u> <u>Taupo's rural environment contributes positively to the districts economic and social wellbeing.</u> <u>Productive capacity</u> <u>Rural land remains available for primary production activities and productive capacity is protected.</u> <u>Reverse Sensitivity</u> <u>Reverse sensitivity effects are managed so as not to constraint primary production activities</u> <u>Rural lifestyle</u> <u>Opportunities for rural lifestyle subdivision and development are only provided in parts of the rural environment where they do not conflict with enabling primary production and protecting the productive potential of land.</u></p>		<p>infrastructure that are regionally and/or nationally significant, which have a functional and/or operational need to be located in the rural environment. If a new strategic direction is to be set for the rural environment, it must be inclusive of all rural industry that have a functional and/or operational need to be located in the rural environment, which is not just primary production activities.</p>	
OS26.59	Horticulture New Zealand	<p>Strategic Directions Create a new strategic direction as follows: <u>SD – RE – 01</u> <u>Primary production activities are recognised and provided for to enable them to operate efficiently and effectively to ensure the contribution for the economic and social wellbeing of the district and not be compromised by inappropriate subdivision,</u></p>	Oppose in part	<p>Genesis is not opposed if a new strategic direction is sought to provide for primary production activities and protect highly productive land from inappropriate developments. However, the rural environment includes several existing strategic infrastructure that are regionally and/or nationally significant, which have a functional and/or operational need to be located in the</p>	<p>Reject the relief sought by the submitter unless the new strategic direction adequately provides for all activities that have a strategic need to be located in the District.</p>

Further Submissions on Plan Change 38 – Strategic Directions					
Sub #	Submitter	Provision and relief sought by submitter Deletion strikethrough. <u>Addition underlined.</u>	Genesis Support / Oppose	Reason for further submission	Genesis relief sought
		<u>use and development.</u> <u>SD – RE – 02</u> <u>Protection of highly productive land from inappropriate development to ensure its production potential for generations to come.</u>		rural environment. If a new strategic direction is to be set, it must be inclusive of all rural industry that have a functional and/or operational need to be located in the rural environment, which is not just primary production activities.	
OS29.10	Waikato Regional Council	2.5 Strategic Direction 5 Significant and Local Infrastructure Amend wording by changing the percentage from 20% to 27% and providing wording that recognises the local and national importance of Taupo’s electricity-producing capability.	Support in part	The relief sought is consistent with the relief sought by Genesis’ original submission.	Accept the relief sought by the submitter insofar as it is consistent with the original submission by Genesis.
OS58.1	Pukawa D2 Trust	Strategic Directions Establish a hierarchy in the Strategic Directions to assist in assessment by including the words in the introductions: <u>The order of the Strategic Directions reflects the status and importance of each Direction and its objectives and policies.</u>	Oppose	Genesis opposes the proposal to establish a hierarchy on the order of the Strategic Directions. Strategic directions are key resource management matters for the district and are considered in the same light without any priority. It is therefore inappropriate to establish a hierarchy as suggested	Reject the relief sought by the submitter.

Further Submissions on Plan Change 42 – General Rural and Rural Lifestyle Environments					
Sub #	Submitter	Provision and relief sought by submitter Deletion strikethrough. <u>Addition underlined.</u>	Genesis Support / Oppose	Reason for further submission	Genesis relief sought
OS22.8	New Zealand Pork Industry	Objective 3b.2.5 - Avoidance of reverse sensitivity Amend the objective as follows: Reverse sensitivity effects on permitted and legally established <u>Primary Production</u> activities within the General Rural Environment, including conflict with activities in neighboring Environments, are avoided	Oppose	The amendments sought are opposed insofar as they would exclude other activities including existing (lawfully established) industrial activities and large-scale recreational activities that are also located within the Rural Environment (including power stations).	Reject the relief sought by the submitter and adopt the relief sought by Genesis' primary submission.
OS22.9	New Zealand Pork Industry	Policy 3b.2.9 - Maintaining the established character Amend the policy to include sight, odour and dust effects associated with primary production activities.	Oppose in part	The amendments sought are opposed insofar as they would exclude effects associated with other activities including existing (lawfully established) industrial activities and large-scale recreational activities that are also located within the Rural Environment (including power stations). These activities are located within the Rural Environment and form part of the existing character. Effects should not be limited to primary production activities.	Reject the relief sought by the submitter and adopt the relief sought by Genesis' primary submission.
OS22.11	New Zealand Pork Industry	Policy 3b.2.13 - Avoiding reverse sensitivity Delete existing policy and replace with new policy as follows: <u>Sensitive activities must be separated from primary production activities through the use of setbacks, to prevent reverse sensitivity effects from impacting on the ability of</u>	Oppose	The amendments sought are opposed insofar as they do not require sensitive activities to be separated from existing (lawfully established) industrial activities and large-scale recreational activities that are also located within the Rural Environment (including power	Reject the relief sought by the submitter and adopt the relief sought by Genesis' primary submission.

Further Submissions on Plan Change 42 – General Rural and Rural Lifestyle Environments					
Sub #	Submitter	Provision and relief sought by submitter Deletion strikethrough. <u>Addition underlined.</u>	Genesis Support / Oppose	Reason for further submission	Genesis relief sought
		<u>primary production to operate within the zone.</u>		stations). The amendments sought do not afford any consideration of reverse sensitivity effects with respect to these existing land use activities. Consideration of reverse sensitivity effects should not be limited to primary production activities.	
OS26.15	Horticulture New Zealand	Section 10 Definitions Include a definition for reverse sensitivity being: <u>Means the vulnerability of an existing lawfully established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activity, thereby creating the potential for the Horticulture New Zealand operation of such existing activity to be constrained.</u>	Support in part	To ensure consistency, Genesis considers the existing definition in the Waikato RPS should be used. Reverse sensitivity is defined as: “Is the vulnerability of a lawfully established activity to a new activity or land use. It arises when a lawfully established activity causes potential, actual or perceived adverse environmental effects on the new activity, to a point where the new activity may seek to restrict the operation or require mitigation of the effects of the established activity.”	Accept the relief sought by the submitter in part subject to the definition in the Waikato RPS being adopted.
OS26.20	Horticulture New Zealand	3 Objectives and policies Include a new objective that reads: <u>The rural environment is used for primary production activities, ancillary activities that support primary production and other compatible activities that have a functional</u>	Oppose	Genesis considers the existing objectives and policies are already comprehensive to capture primary production activities without the need for a further objective.	Reject the relief sought by the submitter.

Further Submissions on Plan Change 42 – General Rural and Rural Lifestyle Environments					
Sub #	Submitter	Provision and relief sought by submitter Deletion strikethrough . Addition underlined.	Genesis Support / Oppose	Reason for further submission	Genesis relief sought
		<u>and operational need to be in a rural environment.</u>			
OS26.25	Horticulture New Zealand	<p>Policy 3b.2.9 Maintaining the established character</p> <p>Delete existing policy and replace with a new policy that reads:</p> <p><u>Land use and subdivision activities are undertaken in a manner that maintains or enhances the rural character and amenity of the rural environment, which includes:</u></p> <ul style="list-style-type: none"> i. <u>a predominance of primary production activities</u> ii. <u>generally open space between built structures</u> iii. <u>typical adverse effects such as odour, noise and dust associated with a rural working environment; and</u> iv. <u>a diverse range of rural environments, rural character and amenity values throughout the district.</u> 	Oppose	The amendments proposed by the submitter are inconsistent with the relief sought in the original submission by Genesis.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Genesis.
OS26.27	Horticulture New Zealand	<p>3b.2 Objectives and Policies – General Rural</p> <p>Include a new policy this is consistent with National Policy Statement of Highly Productive Land and avoids incompatible activities from rural environment.</p> <p>The following wording is proposed:</p>	Support in part	Genesis supports the adoption of a new policy to avoid incompatible land use activities establishing within the Rural Environment provided the wording of the proposed policy is consistent with the National Policy Statement of Highly Productive Land and does not preclude	Accept the relief sought by the submitter subject to amendments that ensure the proposed wording is consistent with the National Policy Statement of Highly Productive Land and does not preclude renewable electricity generation activities from

Further Submissions on Plan Change 42 – General Rural and Rural Lifestyle Environments					
Sub #	Submitter	Provision and relief sought by submitter Deletion strickethrough . <u>Addition underlined.</u>	Genesis Support / Oppose	Reason for further submission	Genesis relief sought
		<p>Avoid land use that</p> <ul style="list-style-type: none"> i. <u>is incompatible with the purpose, character and amenity of the general rural environment;</u> ii. <u>does not have a functional need to locate in the general rural environment and is more appropriately located in another environment;</u> iii. <u>would result in the loss of productive capacity of highly productive land;</u> iv. <u>would exacerbate natural hazards; and</u> v. <u>cannot provide appropriate on-site infrastructure.</u> vi. <u>could result in reverse sensitivity effects</u> 		renewable electricity generation activities from establishing within a Rural Environment.	establishing within a rural environment.
OS26.29	Horticulture New Zealand	<p>Policy 3b.2.13 Avoiding reverse sensitivity Replace the existing wording with the following: Any adverse effects generated by an activity must be managed within the allotment so as to avoid adversely affecting permitted and lawfully established neighbouring activities. <u>Manage the establishment, design and location of new sensitive activities and other non-productive activities in the general rural environment to avoid where possible, or otherwise mitigate, reverse sensitivity effects</u></p>	Oppose	The suggested wording only refers to reverse sensitivity effects on primary production activities, and therefore excludes other existing lawfully established activities (including power stations) within the Rural Environment, and for which reverse sensitivity is still relevant.	Reject the relief sought by the submitter.

Further Submissions on Plan Change 42 – General Rural and Rural Lifestyle Environments					
Sub #	Submitter	Provision and relief sought by submitter Deletion struckthrough . Addition underlined.	Genesis Support / Oppose	Reason for further submission	Genesis relief sought
		<u>on primary production activities.</u>			
OS35.11	Miraka Limited	Rule 4b.1.5 Commercial and industrial activities, and home businesses Amend Rule 4b.1.5 to delete the permitted activity status to avoid activities of this nature without a functional need to locate in the General Rural Environment.	Oppose	Genesis notes there may be industrial activities which may have a functional need to be located in the rural environment. Accordingly Genesis considers the current rule is appropriate to provide for those activities that meet the relevant performance standards.	Reject the relief sought insofar as it is inconsistent with the original submission by Genesis.
OS91.12	Federated Farmers of New Zealand	3b.2 Objectives and Policies – General Rural Environment Include a definition for ‘essential infrastructure’ and amend objective 3b.2.6 as follows: Objective 3b.2.6 Impacts on <u>essential</u> infrastructure The impacts on <u>essential</u> infrastructure arising from <u>inappropriate</u> subdivision, <u>use</u> and development are <u>managed avoided, remedied or mitigated where it is possible to do so.</u>	Oppose in part	Genesis considers the scope of the objective would be narrowed significantly, and uncertainty of outcomes would surround use of the term ‘essential infrastructure’ without offering a definition of such.	Reject the relief sought by the submitter.
OS91.20	Federated Farmers of New Zealand	Rule 4b.5.1 Subdivision – General Rural Environment Amend Rule 4b.5.1 to provide all subdivision in the rural zone as a controlled activity subject to meeting performance standards as currently drafted, and provide subdivision	Oppose in part	Genesis’ primary submission sought for an additional matter to be included as an assessment matter in rural subdivision. In particular, the adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources	Accept in the relief subject to Genesis’ primary submission being accepted.

Further Submissions on Plan Change 42 – General Rural and Rural Lifestyle Environments					
Sub #	Submitter	Provision and relief sought by submitter Deletion strikethrough. <u>Addition underlined.</u>	Genesis Support / Oppose	Reason for further submission	Genesis relief sought
		down to 4ha.		must be assessed. Subdivision of rural properties to smaller lot sizes should only be permitted subject to the additional assessment being required.	
OS96.8	Heritage New Zealand Pouhere Taonga	<p>3b.2 Objectives and Policies – General Rural Environment</p> <p>Retain the proposed objectives and policies and include a new objective and a new policy as follows:</p> <p><u>New Objective:</u> Protect historic heritage from the effects of subdivision, use and development.</p> <p><u>New Policy:</u> Ensure subdivision, use and development are designed to avoid historic heritage and that any historic heritage is retained within one lot.</p>	Oppose	The submission offers no qualifiers to the effects to be managed such that any effect must be avoided. The use of absolute terms is opposed.	Reject the relief as sought by the submitter.
OS96.9	Heritage New Zealand Pouhere Taonga	<p>3b.3 Objectives and Policies – Rural Lifestyle Environment</p> <p>Retain the proposed objectives and policies and include a new objective and a new policy as follows:</p> <p><u>New Objective:</u> Protect historic heritage from the effects of subdivision, use and development.</p> <p><u>New Policy:</u> Ensure subdivision, use and development are</p>	Oppose	The submission offers no qualifiers to the effects to be managed such that any effect must be avoided. The use of absolute terms is opposed.	Reject the relief as sought by the submitter.

Further Submissions on Plan Change 42 – General Rural and Rural Lifestyle Environments					
Sub #	Submitter	Provision and relief sought by submitter Deletion strikethrough. <u>Addition underlined.</u>	Genesis Support / Oppose	Reason for further submission	Genesis relief sought
		<u>designed to avoid historic heritage and that any historic heritage is retained within one lot.</u>			
OS109.1	Rural Contractors	Section 10 Definitions Replace the definition of ‘rural industry’ with the definition from the National Planning Standards, which states: <u>Means an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production.</u>	Support in part	Genesis’ primary submission seeks amendment to the definition of ‘rural industry’ that relies in turn on acceptance of new definitions for ‘Renewable Electricity Generation’ and ‘Renewable Electricity Generation Activities’.	Accept the relief sought by the submitter insofar as it is consistent with the original submission by Genesis.
OS110.2	Transpower New Zealand Limited	Section 10 Definitions Add a new definition for ‘regionally significant infrastructure’ and include the ‘National Grid’ within this definition.	Support in part	‘Regionally significant infrastructure’ is a defined term in the Waikato Regional Policy Statement. This is preferred and in Genesis’ view should be retained for sake of consistency.	Accept relief in part insofar as renewable electricity generation activities are include in any amended definition of regionally significant infrastructure.
OS110.8	Transpower New Zealand Limited	Section 10 Definitions Amend the definitions for ‘intensive indoor primary production’ and ‘rural industry’ so they are consistent with the National Planning Standards.	Support in part	Genesis’ primary submission sought amendments to the definition of ‘rural industry’ subject to new definitions being included for ‘renewable electricity generation’ and ‘renewable electricity generation activities’. Genesis is not opposed to the definition of ‘rural industry’ being consistent with the National Planning Standards provided the new definitions as outlined in its original submission are included.	Accept the relief sought by the submitter insofar as it is consistent with the original submission by Genesis.

Further Submissions on Plan Change 42 – General Rural and Rural Lifestyle Environments					
Sub #	Submitter	Provision and relief sought by submitter Deletion strikethrough. <u>Addition underlined.</u>	Genesis Support / Oppose	Reason for further submission	Genesis relief sought
OS110.13	Transpower New Zealand Limited	3b Rural Environment Chapter Delete references to the National Grid from the General Rural Environment chapter and the introduce a new Infrastructure/Network Utilities chapter.	Support	Genesis supports the inclusion of a new Infrastructure/Network Utilities chapter. If a new chapter is to be considered, renewable electricity generation activities would also need to be included.	Accept the relief sought to include a new Infrastructure/Network Utilities chapter. Alternatively, accept the relief to delete references to the National Grid from the General Rural Environment chapter insofar as the proposed amendments still provide for the functioning and operation of infrastructure within the General Rural Environment.
OS113.9	Waka Kotahi NZ Transport Agency	4b.2 Performance Standards – General Rural Environment New provision for lighting restrictions within General Rural Environment as follows: <u>4b.2.16 - Maximum Artificial Light Level</u> <u>5 LUX (lumens per square meter) at the boundary.</u>	Oppose	There are activities in the General Rural Environment which rely on 24-hour operation where lighting may be an operational and safety requirement.	Reject the relief sought.
OS116.8	Bryce David McGrath	3b.2 Objectives and Policies – General Rural Environment Amend provision to enable rural residential subdivision within General Rural Environment based on land use capability of marginal or limited productive capacity.	Oppose	Genesis considers accepting this submission would potentially allow a proliferation of lifestyle blocks including in inappropriate locations.	Reject the relief sought by the submitter.



First name: Joan

Last name: Forret

On behalf of:
Pukawa D3 Trust

Postal address:
Suburb:
City:
Country: New Zealand

Email: joan.forret@harkness.co.nz

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:

Consultation Document Submissions

Original Submitter: #41 John Lenihan (11-15 Great South Road, Epsom, Auckland, New Zealand, 1051)

Original Point: #41.1 2.1 Strategic Direction 1 Tangata Whenua

Points: FS217.1

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Please see attached Further Submission

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

Please see attached Further Submission

Attached Documents

File
D3 Further Submissions

Form 6

Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation

[Clause 8](#) of Schedule 1, Resource Management Act 1991

Taupō District Plan

Name of person making further submission: Margaret Annette Asher, Janet Raukawa Galbraith and Edward Te Tuiroi Hakopa as Trustees of the Pukawa D3 Trust.

This is a further submission in support of submissions on Taupō District Proposed Plan 38.

We have an interest in the proposal that is greater than the interest the general public has. The Trust is directly affected by the contents of the submissions.

The specific submissions on Proposed Plan 38 that this further submission relates to is outlined in **Attachment A**

We wish to be heard in support of my further submission.

If others make a similar submission, I will consider presenting a joint case with them at a hearing.



Signature of submitter
(or person authorised to sign
on behalf of submitter)

Date 06/04/2023

Electronic address for service of submitter: joan.forret@harkness.co.nz;
charlotte.muggeridge@harkness.co.nz

Telephone: 07 834 4662

Postal address Private Bag 3077, Hamilton, 3240

Contact person: Joan Forret

Attachment A

Submitter	Submission Point	Summary of Submission	Support or Oppose	Reasons for Further Submission	Decision Sought (allow/disallow)
Rangatira Block Trust (John Lenihan)	OS41.1 Plan Change 38 - Strategic Directions > 2.1 Strategic Direction 1 Tangata Whenua	Support and Retain	Support in part	Mana whenua rights should be recognised and protected (as well as listened to).	Allow
	OS41.2 Plan Change 38 - Strategic Directions > 2.1.2 Objective	Support and Retain.	Support	Mana Whenua should be recognised as a partner in District Plan decision making.	Allow
	OS41.3 Plan Change 38 - Strategic Directions > 2.1.3 Policy 5 OS41.4	This policy (ie Policy 5) wording is ambiguous and can be interpreted that Maori Multiple owned land should remain as under utilised and undeveloped.	Support	Agree that policy should be worded to reflect Council's intent to address perceived constraints hindering development of Māori land.	Allow

Attachment A

Submitter	Submission Point	Summary of Submission	Support or Oppose	Reasons for Further Submission	Decision Sought (allow/disallow)
	Plan Change 38 - Strategic Directions > 2.1.3 Policy 6	The wording of this policy (ie Policy 6) does not recognise that the District Plan and supporting documents such as TDC 2050 growth Strategy (2018) do not have the provisions to enable development, the current provisions have restrained development.	Support	Agree that policy should be worded to reflect Council's intent to address perceived constraints hindering development of Māori land. Agree with amended wording proposed by submitter.	Allow
	OS41.13 Plan Change 38 - Strategic Directions > 2.6 Strategic Direction 6 Natural Environment Values	The loss of environmental values, character and amenity on other land should not be a burden to remedy on Māori landowners, where Māori land is treated as reserves or to be protected	Support	Māori are in a position to determine how their land should be protected.	Allow
Ngati Tahu- Ngati Whaoa Runanga Trust (Michelle Phillips)	OS66.1 Plan Change 38 - Strategic Directions > 2.1 Strategic Direction 1 Tangata Whenua	Recognises the principles of Te Tiriti o Waitangi as well as iwi values and aspirations.	Support	Principles of Te Tiriti o Waitangi should be recognised, as well as iwi aspirations.	Allow
	OS66.4 Plan Change 38 - Strategic	The loss of environmental values, character and amenity on other land should not be a burden to remedy on Maori landowners, where maori land is	Support	Restrictions have been placed by Council over Māori land, which resulted in, for example, present	Allow

Attachment A

Submitter	Submission Point	Summary of Submission	Support or Oppose	Reasons for Further Submission	Decision Sought (allow/disallow)
	Directions > 2.6 Strategic Direction 6 Natural Environment Values	treated as reserves or to be protected (because it has been left in a natural state due to planning frameworks and statutes).		vegetation growing over land that was always used as gardens. Māori are best placed to decide how to manage their land and address the overall loss of environmental values and character.	
Department of Conservation (Ashiley Sycamore)	OS89.2 Plan Change 38 - Strategic Directions	The Director-General notes that while biodiversity compensation is mentioned once in the ODP, there needs to be a more coordinated shift towards an effects management hierarchy to have better regard to section 6(c) of the RMA.	Support in part	The change does not outline how biodiversity compensation will be addressed on Māori land. We are supportive of these additional objectives/policies, provided it considers how this applies to Māori land. We have also suggested a hierarchy to the objectives and that hierarchy will need to be considered with new policies/objectives.	Allow
	OS89.3 Plan Change 38 - Strategic Directions > 2.1 Strategic Direction 1 Tangata Whenua	The Director-General generally supports the tangata whenua section, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the chapter. The provisions are consistent with Part 2 of the RMA and wider planning documents.	Support	Iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the chapter. Agree that spelling errors need to be corrected.	Allow

Attachment A

Submitter	Submission Point	Summary of Submission	Support or Oppose	Reasons for Further Submission	Decision Sought (allow/disallow)
	OS89.9 Plan Change 38 - Strategic Directions > 2.6.2 Objectives	The Director-General supports proposed Objective 2 for being consistent with section 6(c) of the RMA.	Support	Indigenous vegetation is a matter of national importance.	Allow
	OS89.10 Plan Change 38 - Strategic Directions > 2.6.2 Objectives	The Director-General supports proposed Objective 3.	Support in part	Offsetting should also be recognised in this Objective.	Allow
	OS89.11 Plan Change 38 - Strategic Directions > 2.6.2 Objectives	The Director-General generally supports proposed Objective 4, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the objective.	Support	Iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the chapter.	Allow
	OS89.12 Plan Change 38 - Strategic Directions > 2.6.2 Objectives	The Director-General requests an amendment to strengthen the wording of proposed Objective 5 and thereby have better regard to section 6(b) of the RMA.	Support	This objective should be linked to "outstanding landscapes".	Allow
	OS89.13 Plan Change 38 - Strategic	The Director-General generally supports proposed Objective 6, noting that iwi/hapu/whanau are best placed to provide specific comments in relation	Support	Iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the chapter.	Allow

Attachment A

Submitter	Submission Point	Summary of Submission	Support or Oppose	Reasons for Further Submission	Decision Sought (allow/disallow)
	Directions > 2.6.2 Objectives	to the appropriateness of the content and wording of the objective.		The relationship of tāngata whenua with the natural values of their ancestral lands as an Objective to the Strategic Directions should be recognised and is in the way it is currently drafted.	
	OS89.14 Plan Change 38 - Strategic Directions > 2.6.2 Objectives	The Director-General supports proposed Objective 7.	Support	The Natural character of riparian margins should be preserved, however Māori are best placed to decide how to preserve natural character, whether that be retaining, enhancing or developing the riparian margin.	Allow
	OS89.15 Plan Change 38 - Strategic Directions > 2.6.3 Policies	The Director-General requests the inclusion of 'subdivision' within proposed Policy 1 to allow for consideration of the adverse effects that could occur on SNAs from subdivision.	Support in part	Consideration on how this affects Māori land needs to be considered. Māori are best placed to decide whether subdivision should take place on their land and offsetting should be a tool available to Māori.	Allow with amendments
	OS89.16 Plan Change 38 - Strategic Directions > 2.6.3 Policies	The Director-General supports proposed Policy 2.	Support	Agreed that the natural value of areas of significant indigenous vegetation can be supported.	Allow
	OS89.17 Plan Change 38 - Strategic Directions > 2.6.3 Policies	The Director-General generally supports proposed Policy 3, noting that iwi/hapu/whanau are best placed to provide specific comments	Support	Iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the chapter.	Allow

Attachment A

Submitter	Submission Point	Summary of Submission	Support or Oppose	Reasons for Further Submission	Decision Sought (allow/disallow)
		in relation to the appropriateness of the content and wording of the policy.			
	OS89.18 Plan Change 38 - Strategic Directions > 2.6.3 Policies	The Director-General supports proposed Policy 4.	Support in part	The general wording is agreed, however, Māori should be able to use their land as they see fit for their communities whether that be enhancing, offsetting or developing.	Allow
	OS89.19 Plan Change 38 - Strategic Directions > 2.6.3 Policies	The Director-General generally supports proposed Policy 5, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the policy.	Support	Iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the chapter.	Allow
Kāinga Ora (Gurv Singh)	OS104.1 Plan Change 38 - Strategic Directions > 2.1.2 Objective	The submitter considers Papakainga housing to be inherently residential in nature and provisions should be drafted to reflect this to allow Maori to develop housing that meets their cultural norms which is not restricted to Maori title land only. Moreover, the provision of a permissive framework for Papakainga housing is in accordance with policy 1(a)(ii) of the NPS-UD. Submitter seek to amend 2.1.2(4) as follows:	Support	Iwi/hapu/whanau should be able to develop their land for papakainga housing, whether that be on Māori land, or general land held by a Māori entity.	Allow

Attachment A

Submitter	Submission Point	Summary of Submission	Support or Oppose	Reasons for Further Submission	Decision Sought (allow/disallow)
		Support Papakainga on sites within urban areas, including general title land, as well as development on Maori land that meet the needs of those landowners and respects the land, water, significant sites and Wahi tapu.			
	OS104.2 Plan Change 38 - Strategic Directions > 2.1.3 Policy	The submitter seeks to amend 2.1.3(6) as follows: Enable the development of papakainga in urban areas, including on general title land, as well as development of Maori Land within the provisions of the plan for the purposes of fulfilling the economic and social aspirations of those owners Maori.	Support	Iwi/hapu/whanau should be able to develop their land for papakainga housing, whether that be on Māori land, or general land held by a Māori entity.	Allow
Te Kotahitanga o Ngati Tuwharetoa (George Asher)	OS115.1 Plan Change 38 - Strategic Directions > 2.1.2 Objective	TKNT generally support the overall content of Objective 2.1.2.	Support	Agree with the content of the Objective.	Allow
	OS115.2 Plan Change 38 - Strategic Directions > 2.1.3 Policy	TKNT recommend that the following wording changes be made to the following policies:	Support	We agree with making the policy more clear and directive towards supporting mana whenua.	Allow

Attachment A

Submitter	Submission Point	Summary of Submission	Support or Oppose	Reasons for Further Submission	Decision Sought (allow/disallow)
	OS115.3 Plan Change 38 - Strategic Directions > 2.1.2 Objective	That TDC agree to include additional objectives in accordance with the requirements of Te Kaupapa Kaitiaki.	Support	Te Kaupapa Kaitiaki should be included as it is a relevant catchment plan.	Allow
	OS115.13 Plan Change 38 - Strategic Directions > 2.6 Strategic Direction 6 Natural Environment Values	<p>1. TKNT support objectives and policies that protect, enhance and restore significant indigenous ecosystems, habitats and indigenous species from the adverse effects of inappropriate development.</p> <p>2. TKNT note and acknowledge the extraordinary steps that Ngati Tuwharetoa, Maori landowners and hapu (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).</p> <p>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</p>	Support in Part	<p>Comments 1 to 4 are acknowledged and agreed with.</p> <p>Recommendation 5 is supported to the extent that SNA status over Māori land should be the outcome, only, of a properly mandated and robust consultation process.</p> <p>Recommendations 6 and 7 are agreed with.</p>	Allow

Attachment A

Submitter	Submission Point	Summary of Submission	Support or Oppose	Reasons for Further Submission	Decision Sought (allow/disallow)
		<p>principles of Ngati Tuwharetoa kawa, tikanga and matauranga. In this regard the process of identification and assignment has been imposed by force of legislation and without proper consultation processes....</p> <p>4. That TKNT support without reservation, the position of Ngati Tuwharetoa landowners and hapu who oppose directly the assignment (proposed or actual) of Significant Natural Areas (SNAs) on their lands</p> <p>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.</p> <p>6. TKNT recommend that TDC, the Crown and appropriate regional authorities confirm acceptance of a Moratorium on SNAs as explained above and invite Maori landowners and Hapu to discuss and agree a fair</p>			

Attachment A

Submitter	Submission Point	Summary of Submission	Support or Oppose	Reasons for Further Submission	Decision Sought (allow/disallow)
		<p>and equitable process and agenda to re-engage in discussions on Natural Environmental Values.</p> <p>7. TKNT recommend that these ecosystem services produced by Maori land owners are fully evaluated and a system of rewards is developed to recognise the contribution of the landowners who deliver these services.</p>			
	<p>OS115.15</p> <p>Plan Change 38 - Strategic Directions</p>	<p>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.</p> <p>Make amendments to ensure PC38 recognise and provide for the vision, objectives, values, and desired outcomes in Te Kaupapa Kaitiaki.</p>	Support	Changes to the Directions should be made to reflect legislation.	Allow
	<p>OS115.21</p> <p>Plan Change 38 - Strategic Directions</p>	<p>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.</p>	Support	All of the Directions should reflect the principles of Te Tiriti/The Treaty of Waitangi.	Allow



First name: Gemma

Last name: Hayes

Postal address:

Suburb:

City:

Country: New Zealand

Email: gemma.hayes@education.govt.nz

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
Taupo District Plan Changes 38-43 further submission MOE

Form 6

Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation under Clause 6 of Schedule 1, Resource Management Act 1991.

To: Taupō District Council

Name of submitter: Ministry of Education ('the Ministry')

Address for service: Eden 5, Level 3/12-18 Normanby Road
Mount Eden
Auckland 1011

Attention: Gemma Hayes

Phone: 09 638 02694

Email: Gemma.hayes@education.govt.nz

This is a further submission on the Draft Taupō District Plan - Plan Changes 38 - 43 (the Plan Changes)

Background:

The Ministry is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading, and improving the portfolio, purchasing, and constructing new property to meet increased demand, identifying, and disposing of surplus State school sector property and managing teacher and caretaker housing. The Ministry is therefore a considerable stakeholder in terms of activities that may impact on existing and future educational facilities and assets in the Taupō District.

The Urban Form and Development strategic direction section of the Taupō District Plan states that the Taupō District's growing population has led to increased demand on infrastructure. This is also expected to lead to additional pressure on social infrastructure, such as education facilities, as demand increases as a result of residential growth.

The Ministry provided feedback to Taupō District Council on the Draft Taupō District Plan Changes in June 2022. All of the feedback provided on the new Strategic Directions chapter was accepted and included in the updated Plan Change 38 document. The Ministry supported the adoption of these changes in their submission on the Draft Taupō District Plan - Plan Changes 38 – 43 (submission numbers OS85.1, OS85.2 and OS85.3).

Further Submissions on the Draft Taupō District Plan - Plan Changes 38 – 43 in relation to the Ministry's interest:

Submission OS106.7 made on behalf of The Lines Company Limited opposes the amendment of Strategic Directions policy 2.3.3 and requests the following amendment of sub-clause 5:

Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure ~~(including development and additional infrastructure)~~, according to the capacity limitations of that infrastructure.

The Ministry opposes submission OS106.7 from The Lines Company Limited. The NPS-UD (Section 3.5, Part 3: Implementation) requires local authorities to be satisfied that additional infrastructure to service development capacity is likely to be available. The inclusion of the wording '*...including development and additional infrastructure*' to Policy 2.3.3 recognises the requirement of the NPS-UD and appropriately provides for consideration for the school network capacity.

Decision sought:

The Ministry remains neutral on the Draft Taupō District Plan - Plan Changes 38 - 43 in their current form provided the provisions supported in the Ministry's submission remain as currently drafted.

The relief sought by the Ministry in this further submission is outlined in Attachment 1. The Ministry submit that the proposed amendment requested in submission point OS106.7 by The Lines Company Limited should be rejected for the reasons listed.

Gemma Hayes

Principal Planning Advisor - Natural & Built Environments
Te Pou Hanganga, Matihiko | Infrastructure & Digital

Date: 5 April 2022

Attachment 1: The Ministry of Education’s Further Submission on the Draft Taupō District Plan - Plan Changes 38 – 43

The Ministry oppose the following submission points and request they not be added to the Draft Taupō District Plan - Plan Changes 38 – 43.

Submission Point	Submitter	Submission	Relief sought from the ministry
OS106.7	The Lines Company Limited	<p>Plan Change 38 - Strategic Directions > 2.3.3 Policy</p> <p>The submitter supports the intent of this policy sub clause, but considered unnecessary to reference development and additional infrastructure. Subdivision and land use (urban) cannot occur without being serviced by infrastructure and given the strategic level of the policy, it is not particularly beneficial to differentiate between ‘types’ of necessary infrastructure. Supports reference in the policy sub clause clearly associating infrastructure provision with capacity.</p>	<p>The Ministry opposes the amendment of Strategic Directions policy 2.3.3</p> <p>The Ministry has supported <i>Plan Change 38 - Strategic Directions > 2.3.3 Policy</i> in their submission as the wording in the proposed provision is in line with the Ministry’s feedback that was provided in June 2022 to Taupō District Council.</p> <p>The Ministry opposes submission OS106.7 from The Lines Company Limited. The NPS-UD (Section 3.5, Part 3: Implementation) requires local authorities to be satisfied that additional infrastructure to service development capacity is likely to be available. The inclusion of ‘<i>(including development and additional infrastructure)</i>’ to Policy 2.3.3 recognises this requirement and appropriately provides consideration for the school network capacity.</p>



First name: Gemma

Last name: Hayes

On behalf of:
Ministry of Education

Postal address:
Suburb:
City:
Country: New Zealand

Email: Gemma.hayes@education.govt.nz

Daytime Phone:

- 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

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Taupo District Plan Changes 38-43 further submission (1)

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The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading, and improving the portfolio, purchasing, and constructing new property to meet increased demand, identifying, and disposing of surplus State school sector property and managing teacher and caretaker housing. The Ministry is therefore a considerable stakeholder in terms of activities that may impact on existing and future educational facilities and assets in the Taupō District.

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Submission OS106.7 made on behalf of The Lines Company Limited opposes the amendment of Strategic Directions policy 2.3.3 and requests the following amendment of sub-clause 5:

Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure ~~(including development and additional infrastructure)~~, according to the capacity limitations of that infrastructure.

The Ministry opposes submission OS106.7 from The Lines Company Limited. The NPS-UD (Section 3.5, Part 3: Implementation) requires local authorities to be satisfied that additional infrastructure to service development capacity is likely to be available. The inclusion of the wording '*...including development and additional infrastructure*' to Policy 2.3.3 recognises the requirement of the NPS-UD and appropriately provides for consideration for the school network capacity.

Decision sought:

The Ministry remains neutral on the Draft Taupō District Plan - Plan Changes 38 - 43 in their current form provided the provisions supported in the Ministry's submission remain as currently drafted.

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Te Pou Hanganga, Matihiko | Infrastructure & Digital

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**Organisation:**

McKenzie and Co

First name: Kirsteen**Last name:** McDonald**On behalf of:**

Sikka & Aggarwal Investment Limited

Postal address: PO Box 1325**Suburb:****City:** Taupo**Country:** New Zealand**Postcode:** 3351**Email:**

kirsteen.mcdonald@mckenzieandco.co.nz

Daytime Phone: 07 378 8635

- I could
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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**Original Submitter:** #79 Catriona Eagles ()**Original Point:** #79.18 Policy 3b.2.11 Heavy vehicle movements**Points: FS219.1****Do you support or oppose the original submission point/submission?****Please state the reasons for your support/opposition:****Support**

Successful tourism activities can generate high volume of vehicle movements however these are generally not from heavy vehicles which the policy specifically refers to.

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

Support the amendment of related rule to include assessment criteria

Original Submitter: #29 Megan Kettle (Unknown, New Zealand, Unknown)

Original Point: #29.3 2.3.2 Objectives

Points: FS219.2

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Oppose - We do not support the inclusion of geothermal vegetation as a SGF. The merits of geothermal vegetation in a particular location is able to be appropriately considered through the identification of SNA and the public process associated with that.

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

Oppose inclusion of additional wording

Original Submitter: #29 Megan Kettle (Unknown, New Zealand, Unknown)

Original Point: #29.4 2.3.2 Objectives

Points: FS219.3

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Oppose - Taupo contains large areas subject to geothermal influence and potential hazards can be appropriately mitigated by design solutions so that avoidance is not required.

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

Oppose inclusion of additional wording

Original Submitter: #29 Megan Kettle (Unknown, New Zealand, Unknown)

Original Point: #29.8 2.3.3 Policy

Points: FS219.4

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Oppose - Avoidance means that appropriate subdivision and development cannot not be done, the term 'close proximity' is a vague and undefined term.

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

Oppose inclusion of additional wording

Original Submitter: #46 Chris Marshall (, New Zealand)

Original Point: #46.9 2.4.3 Policy

Points: FS219.5

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Oppose because most rural land contains overland flow paths and to avoid subdivision means it cannot be done.

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

Oppose addition of new policy

Attached Documents

File
No records to display.

**Organisation:**

McKenzie and Co

First name: Kirsteen**Last name:** McDonald**Postal address:****Suburb:****City:****Country:** New Zealand**Postcode:****Email:**

kirsteen.mcdonald@mckenzieandco.co.nz

Daytime Phone: 07 378 8635 I could I could not

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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**Original Submitter:** #53 Burke Carlton (1160 Mapara Road, Kinloch, New Zealand, 3385)**Original Point:** #53.1 Planning Maps**Points: FS219.6****Do you support or oppose the original submission point/submission?****Please state the reasons for your support/opposition:****Support**

Property is within the additional area identified for Rural Lifestyle zoning in submission #61.10

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

Support the inclusion of this property in Rural Lifestyle zone

Original Submitter: #53 Burke Carlton (1160 Mapara Road, Kinloch, New Zealand, 3385)

Original Point: #53.2 Planning Maps

Points: FS219.7

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Property is within the additional area identified for Rural Lifestyle zoning in submission #61.10

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

Support the inclusion of this property in Rural Lifestyle zone

Original Submitter: #54 Sally Carlton (6 Kahira Crescent, Papamoa Beach, Papamoa 3118 , Papamoa Beach, Papamoa, New Zealand, 3118)

Original Point: #54.1 Planning Maps

Points: FS219.8

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Property is within the additional area identified for Rural Lifestyle zoning in submission #61.10

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

Support the inclusion of this property in Rural Lifestyle zone

Original Submitter: #54 Sally Carlton (6 Kahira Crescent, Papamoa Beach, Papamoa 3118 , Papamoa Beach, Papamoa, New Zealand, 3118)

Original Point: #54.2 Planning Maps

Points: FS219.9

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Property is within the additional area identified for Rural Lifestyle zoning in submission #61.10

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

Support the inclusion of this property in Rural Lifestyle zone

Original Submitter: #73 Jan Curtis (2 Sedge Grove, Nukuhau, Taupo, New Zealand, 3330)

Original Point: #73.1 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS219.10**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Property is within the additional area identified for Rural Lifestyle zoning in submission #61.10

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

Support the inclusion of this property in Rural Lifestyle Zone

Original Submitter: #73 Jan Curtis (2 Sedge Grove, Nukuhau, Taupo, New Zealand, 3330)

Original Point: #73.2 Plan Change 42 - General Rural and Rural Lifestyle Environments **Points: FS219.11**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Property is within the additional area identified for Rural Lifestyle zoning in submission #61.10

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

Support the inclusion of this property in Rural Lifestyle zone

Original Submitter: #80 Lars Carlton (1182 Mapara Road Kinloch 3385, Kinloch, New Zealand, 3385)

Original Point: #80.1 Planning Maps **Points: FS219.12**

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Property is within the additional area identified for Rural Lifestyle zoning in submission #61.10

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

Support the inclusion of this property in Rural Lifestyle zone

Original Submitter: #80 Lars Carlton (1182 Mapara Road Kinloch 3385, Kinloch, New Zealand, 3385)

Original Point: #80.2 Planning Maps

Points: FS219.13

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Property is within the additional area identified for Rural Lifestyle zoning in submission #61.10

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

Support the inclusion of this property in Rural Lifestyle zone

Original Submitter: #81 Timothy Carlton (1182 Mapara Road Kinloch 3385, Kinloch, New Zealand, 3385)

Original Point: #81.1 Planning Maps

Points: FS219.14

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Property is within the additional area identified for Rural Lifestyle zoning in submission #61.10

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

Support the inclusion of this property in Rural Lifestyle zone

Original Submitter: #81 Timothy Carlton (1182 Mapara Road Kinloch 3385, Kinloch, New Zealand, 3385)
Original Point: #81.2 Planning Maps

Points: FS219.15

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Property is within the additional area identified for Rural Lifestyle zoning in submission #61.10

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

Support the inclusion of this property in Rural Lifestyle zone

Original Submitter: #92 Samuel Gray (939 Tukairangi Road, Acacia Bay, Taupo, New Zealand, 3385)

Original Point: #92.1 Planning Maps

Points: FS219.16

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Property is within the additional area identified for Rural Lifestyle zoning in submission #61.10

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

Support the inclusion of this property in Rural Lifestyle zone

Original Submitter: #116 Bryce David McGrath (1281 Mapara Road, RD 5, Taupo, New Zealand, 3385)

Original Point: #116.1 Planning Maps

Points: FS219.17

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Property is within the additional area identified for Rural Lifestyle zoning in submission #61.10

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

Support the inclusion of this property in Rural Lifestyle zone

Original Submitter: #116 Bryce David McGrath (1281 Mapara Road, RD 5, Taupo, New Zealand, 3385)

Original Point: #116.2 Planning Maps

Points: FS219.18

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

Property is within the additional area identified for Rural Lifestyle zoning in submission #61.10

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

Support the inclusion of this property in Rural Lifestyle zone

Attached Documents

File
No records to display.

Organisation:

Federated Farmers of New Zealand

First name: Jo-Anne**Last name:** Cook Munro**Postal address:** 444 Anglesea Street**Suburb:****City:** Hamilton**Country:** New Zealand**Email:** jcookmunro@fedfarm.org.nz**Daytime Phone:** 64 273 310 084

- 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:

Federated Farmers will consider presenting a joint case with them at the hearing.

Attached Documents

File
23030404 FFNZ Further submission PC38



Proposed Plan Change 38 'Strategic Direction' to the Taupō District Plan

Further submissions on behalf of Federated Farmers of New Zealand

4 April 2023



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FURTHER SUBMISSION

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To: Taupō District Council
30 Tongariro Street
Taupō 3330

Private Bag 2005
Taupō 3352

Via email: districtplan@taupo.govt.nz

Further Submissions on: **Proposed Plan Change 38 – Strategic Direction**

Date: 4 April 2023

Submission by: Federated Farmers of New Zealand – Rotorua / Taupō

COLIN GUYTON

ROTORUA / TAUPŌ PROVINCIAL PRESIDENT

Federated Farmers of New Zealand

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Address for service:

JO-ANNE COOK MUNRO

SENIOR POLICY ADVISOR / SOLICITOR

Federated Farmers of New Zealand

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1. INTRODUCTION

- 1.1 Federated Farmers welcomes the opportunity to provide further submissions on Proposed Plan Change 38 'Strategic Direction' (PC38) to the Taupō District Plan.
- 1.2 Federated Farmers of New Zealand (**Federated Farmers**) has an interest in PC38 to the Taupo District Plan that is greater than the interest the general public has.
- 1.3 Federated Farmers is a primary sector organisation with a long and proud history of representing the needs and interests of New Zealand farmers involved in a range of rural businesses. We are a pan sector organisation that works with farmers to ensure practical and workable outcomes.
- 1.4 Federated Farmers aims to add value to its members' farming businesses. Its key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
 - (a) our members may operate their business in a fair and flexible commercial environment;



- (b) our members' families and their staff have access to services essential to the needs of the rural community; and
 - (c) our members adopt responsible management and environmental practices.
- 1.5 FFNZ made submissions on PC 38, PC 41, PC42 and Proposed Plan Change 43 – Taupō Industrial Land and has been assigned the submitter number 91 as shown in the submitter's details document on the Council's website.
 - 1.6 Section 2 contains the table that sets out Federated Farmers' further submissions in respect of submission points made by other parties on PC38. The table also indicates whether Federated Farmers supports or opposes these primary submissions, the reasons for the position that it has taken, and the relief sought.
 - 1.7 Federated Farmers wishes to be heard in support of these further submissions. If others are making a similar submission, Federated Farmers will consider presenting a joint case with them at the hearing.
 - 1.8 Federated Farmers could not gain an advantage in trade competition through these further submissions.
 - 1.9 FFNZ can confirm that copies of this further submission have been served on the parties who made the original submission.

Dated: 4 April 2023

Jo-Anne Cook-Munro
Solicitor

2. FURTHER SUBMISSIONS

Plan Change 38 – Strategic Direction

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
1	New Zealand Pork Industry Board	OS22.23	The submitter seeks the creation of a new strategic direction, objectives, and policies to outline the key strategic and significant resource management issues for the rural environments within the district.	Support	In its submission Federated Farmers sought the inclusion of a new strategic or significant resource management issue and related objectives and policies that focused on rural sustainability and the protection of the rural economy and environment within the Taupō district; and	Federated Farmers seeks the inclusion of a new strategic direction issue, objectives, and policies into Chapter 2.
2	Horticulture New Zealand	OS26.29	The submitter sought the addition of a new strategic direction for the rural environment in Chapter 2 Strategic Directions.	Support	In its submission Federated Farmers sought the inclusion of a new strategic or significant resource management issue with appropriate objectives and policies that focused on rural sustainability and the protection of the rural economy and environment within the Taupō district.	Federated Farmers seeks the inclusion of a new strategic direction issue, objectives, and policies into Chapter 2.
3	Waikato Regional Council	OS29.11	The submitter seeks that all geothermal areas that meet the Waikato Regional Policy Statements definition of a significant natural area are mapped and their protection ensured.	Oppose in part	<p>While acknowledging the necessity of mapping significant natural areas, Federated Farmers is concerned over the additional impact that this may have on our members.</p> <p>The relief sought by the Council is seeking something that was not presented in the proposed plan change. Federated Farmers has not had an appropriate opportunity to review the potential impact of additional significant natural area overlays will have on its members.</p>	Decline the relief sought until appropriate engagement has occurred with landowners affected by the relief sought.
4	Manawa Energy Limited	OS57.3	The submitter seeks the amendment of Policy 2.4.3 so that it is solely focused on renewable electricity generation.	Oppose	Policy 2.4.3 is in the climate change strategic direction section (2.4) of chapter 2. It is inappropriate for a section on climate change only to be focused on one activity which is seeking to give itself priority over all other	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
					activities. Consideration of all activities is vital to address climate change.	
5	Ngati Tahu-Ngati Whaoa Runanga Trust	OS66.2	The submitter seeks the amendment of 2.2 Strategic Direction 2 Freshwater Quality / Te Mana o te Wai to provide context for the importance and relevance of Te Mana o te Wai.	Support	Te Mana o te Wai is a crucial concept to be applied and implement to freshwater management moving forward. It is appropriate that there is context given to why Te Mana o te Wai so important and relevant for freshwater management.	Accept the relief sought.
6	Mercury	OS68.4	Submitter seeks the amendment of policy 2.3.3(10) so that it is recognised that conflict from existing activity can occur more widely than just adjoining properties.	Support	The amendments sought by the submitter accurately reflect the potential conflicts that new subdivision and development can have on existing activities and land uses.	Accept the relief sought or amendments with a similar intent.
7	Mercury	OS68.7	The submitter seeks that policies need to be included which specifically provide for and enable activities that will help address climate change.	Oppose	It is inappropriate for one activity to be singled out and given priority in a section of the plan that is providing the strategic direction for climate change. The proposed amendments sought attempt to elevate renewable electricity generation over all other activities. Focusing on one activity over others is not an appropriate way of addressing climate change.	Decline the relief sought.
8	Genesis Energy	OS84.5	The submitter seeks that policies need to be included which specifically provide for and enable activities that will help address climate change.	Oppose	It is inappropriate for one activity to be singled out and given priority in a section of the plan that is providing the strategic direction for climate change. The proposed amendments sought attempt to elevate renewable electricity generation over all other activities. Focusing on one activity over others is not an appropriate way of addressing climate change.	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
9	Genesis Energy	OS84.7	The submitter seeks that the strategic importance and benefits of infrastructure is recognised and protected.	Oppose	Renewable electricity generation, while having positive benefits for people and communities, is one of many activities that occurs under nationally and regionally significant infrastructure. It is inappropriate for one form of infrastructure to be given absolute protection as sought which would give it priority over other activities not based around infrastructure that also contribute significantly to people and communities social and economic well-being (e.g., agriculture and horticulture).	Decline the relief sought.
10	Department of Conservation	OS89.7	Submitter seeks that Policy 2.3.3 (1) is amended to require the avoidance of subdivision and development which will inappropriately affect heritage sites or areas of important natural and landscape values.	Oppose	What the submitter has sought is inconsistent with Part 2 of the Resource Management Act 1991. Section 6(g) requires the protection of historic heritage from inappropriate subdivision, use and development (RMA). The policy should be consistent with Part 2 of the RMA and should not provide absolute protection to activities that are not provided for in s6.	Decline the relief sought.
11	Angela Bell	OS90.1	The submitter seeks that the chapter provides strategic direction on the rural environment and rural-residential zoning which includes objectives, policies, and rules for the consideration of natural hazards, and the effects of climate change, effects on rural and urban infrastructure, productive capability, and reverse sensitivity.	Support	Rural activities make a significant economic contribution to the Taupo district. It is important that this contribution is recognised and having an appropriate strategic direction framework in the District Plan is the first step.	Accept the relief sought.
12	Contact Energy Limited	OS93.12	The submitter seeks that policies need to be included which specifically provide for and enable activities that will help address climate change.	Oppose	It is inappropriate for one activity to be singled out and given priority in a section of the plan that is providing the strategic direction for climate change. The proposed amendments sought attempt to elevate renewable electricity	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
					generation over all other activities. Focusing on one activity over others is not an appropriate way of addressing climate change.	
13	Kainga Ora	OS104.3	The submitter considers that an objective should also be included under PC38 to further support the application of Te Ture Whaimana within the District Plan.	Support	Te Ture Whaimana is the paramount planning document for the Waikato and Waipa River catchments. It is appropriate that this is recognised in the strategic directions chapter.	Accept the relief sought.
14	Transpower New Zealand Limited	OS110.7	The submitter seeks amendments to policy 2.5.3 so ensure that subdivision, use and development does not compromise infrastructure.	Oppose	The submitter's infrastructure is largely located on privately owned property. There needs to be recognition of this by the submitter as well as the recognition of the impacts its infrastructure has on private landowners. The proposed amendments sought have the potential to further restrict what private landowners can do on their land.	Decline the relief sought.
15	Te Kotahitanga o Ngati Tuwharetoa	OS115.4	The submitter seeks the inclusion of an objective that specifically recognises Te Mana o te Wai and that reflects the contents of Te Kaupapa Kaitiaki (the Taupo Catchment Plan).	Support in part	Te Mana o te Wai is a crucial concept to be applied and implement to freshwater management moving forward. It is appropriate that there is context given to why Te Mana o te Wai so important and relevant for freshwater management.	Accept the relief sought.



Proposed Plan Change 42 'General Rural and Rural Lifestyle Environments

Further submissions on behalf of Federated Farmers of New Zealand

6 April 2023



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FURTHER SUBMISSION

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Via email: districtplan@taupo.govt.nz

Further Submissions on: **Proposed Plan Change 42 – General Rural and Rural Lifestyle Environments**

Date: 6 April 2023

Submission by: Federated Farmers of New Zealand – Rotorua / Taupō

COLIN GUYTON

ROTORUA / TAUPŌ PROVINCIAL PRESIDENT

Federated Farmers of New Zealand

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JO-ANNE COOK MUNRO

SENIOR POLICY ADVISOR / SOLICITOR

Federated Farmers of New Zealand

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1. INTRODUCTION

- 1.1 Federated Farmers welcomes the opportunity to provide further submissions on Proposed Plan Change 42 – General Rural and Rural Lifestyle Environments (PC42) to the Taupō District Plan.
- 1.2 Federated Farmers of New Zealand (**Federated Farmers**) has an interest in PC42 to the Taupo District Plan that is greater than the interest the general public has.
- 1.3 Federated Farmers is a primary sector organisation with a long and proud history of representing the needs and interests of New Zealand farmers involved in a range of rural businesses. We are a pan sector organisation that works with farmers to ensure practical and workable outcomes.
- 1.4 Federated Farmers aims to add value to its members' farming businesses. Its key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:



- (a) our members may operate their business in a fair and flexible commercial environment;
 - (b) our members' families and their staff have access to services essential to the needs of the rural community; and
 - (c) our members adopt responsible management and environmental practices.
- 1.5 FFNZ made submissions on PC42 and has been assigned the submitter number 91 as shown in the submitter's details document on the Council's website.
- 1.6 Section 2 contains the table that sets out Federated Farmers' further submissions in respect of submission points made by other parties on PC42. The table also indicates whether Federated Farmers supports or opposes these primary submissions, the reasons for the position that it has taken, and the relief sought.
- 1.7 Federated Farmers wishes to be heard in support of these further submissions. If others are making a similar submission, Federated Farmers will consider presenting a joint case with them at the hearing.
- 1.8 Federated Farmers could not gain an advantage in trade competition through these further submissions.
- 1.9 FFNZ can confirm that copies of this further submission have been served on the parties who made the original submission.

Dated: 6 April 2023

Jo-Anne Cook-Munro
Solicitor

2. FURTHER SUBMISSIONS

Plan Change 42 – General Rural and Rural Lifestyle Environments

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
1	New Zealand Pork Industry Board	OS22.1	The submitter seeks the inclusion of the definition for intensive indoor primary production as set out in the National Planning Standards	Support	District Plans are required to be consistent with the National Planning Standards.	Accept the relief sought.
2	New Zealand Pork Industry Board	OS22.2	The submitter seeks the inclusion of the definition for primary production as set out in the National Planning Standards	Support	District Plans are required to be consistent with the National Planning Standards.	Accept the relief sought.
3	New Zealand Pork Industry Board	OS22.3	The submitter seeks that the term 'sensitive activity' is defined in the District Plan.	Support	It makes sense to ensure that all key terms used throughout the District Plan are defined in the Plan.	Accept the relief sought or include a definition with similar intent to what the submitter has sought.
4	New Zealand Pork Industry Board	OS22.5	The submitter seeks the inclusion of the definition for primary production as set out in the National Planning Standards	Support	District Plans are required to be consistent with the National Planning Standards.	Accept the relief sought.
5	New Zealand Pork Industry Board	OS22.7	The submitter seeks the amendment of objective 3b.2.4 so that it addresses the potential impacts of sensitive activities on primary production activities, rather than enabling them as a general objective.	Support	It is appropriate to address the potential impact of sensitive activities on the general rural environment rather than enabling these activities to occur without any consideration of the impact that they may have.	Accept relief sought.
6	New Zealand Pork Industry Board	OS22.8	The submitter supports the inclusion of an objective that looks to avoid reverse sensitivity but believes the objective should be should specifically link back to not constraining the operation of primary production activities within the environment as this is the primary function of the zone. This should also be supported by a specific rule	Support	It is important to issue that other activities establishing in the general rural zone or adjacent to it do not adversely impact on existing activities who seek to continue their everyday operations.	Accept relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
			framework to managed defined sensitive activities.			
7	New Zealand Pork Industry Board	OS22.11	The submitter supports policy to avoid reverse sensitivity but feels that this should be aimed at protecting primary production activities from neighbouring sensitive activities, to ensure the continued productive operation of the rural environment.	Support	The general rural zone is the main location where primary production occurs. It is essential that the ability for primary production to continue and to occur in the form of new activities is protected. Primary production contributes significantly to the social and economic wellbeing of communities in the Taupo District.	Accept the relief sought.
8	New Zealand Pork Industry Board	OS22.14	The submitter opposes commercial and industrial activity being classified as a permitted activity within the general rural zone. A discretionary activity classification for these types of activities is sought.	Support	Primary production can only occur in the general rural zone and as such should be given priority. Commercial and industrial activities have their own zones in which to locate and have the potential to create reverse sensitivity impacts on primary production activities which should be avoided.	Accept relief sought.
9	New Zealand Agricultural Aviation Association	OS23.3	The submitter seeks the inclusion of a definition for conservation activity that provides for weed and pest control and intermittent use of rural airstrips and landing areas by aircraft for conservation activities.	Support	It is important that any definition included in the district plan is fit for purpose.	Accept the relief sought.
10	New Zealand Agricultural Aviation Association	OS23.4	The submitter seeks that the definition for primary production included in the district plan is consistent with the definition contained in the National Planning Standards.	Support	All regional and district plans will eventually be required to be consistent with the National Planning Standards. It is important that the defined terms in the district plan are consistent with the Standards.	Accept relief sought.
11	Manulife Forest Management New Zealand	OS25.17	The submitter seeks a 30-metre setback for dwellings and all other buildings from neighbouring boundaries in plantation forestry. This is requested for health and safety reasons.	Oppose	The imposition of a 30-metre setback from boundaries next plantation forestry for all residential and other buildings will severely restrict how farmers are able to use their properties. While understanding the need for the setback for residential properties, it is	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
					inappropriate to require it for all other buildings regardless of what those buildings are used for. The potential exists to have a smaller setback for buildings used for non-residential activities.	
12	Horticulture New Zealand	OS26.1	The submitter seeks that the definition for primary production included in the district plan is consistent with the definition contained in the National Planning Standards.	Support	All regional and district plans will eventually be required to be consistent with the National Planning Standards. It is important that the defined terms in the district plan are consistent with the Standards.	Accept the relief sought.
13	Horticulture New Zealand	OS26.3	The submitter seeks that the definition for rural industry included in the district plan is consistent with the definition contained in the National Planning Standards.	Support	All regional and district plans will eventually be required to be consistent with the National Planning Standards. It is important that the defined terms in the district plan are consistent with the Standards.	Accept relief sought.
14	Horticulture New Zealand	OS26.4	The submitter seeks the inclusion of a definition for ancillary rural activities in the district plan.	Support	There is a need to provide for everyday activities that are integral to productive land use in the rural zone. The provision of an appropriate definition for ancillary rural earthworks and a clear rule framework is an efficient approach.	Accept the relief sought.
15	Horticulture New Zealand	OS26.5	The submitters seeks the inclusion of a definition for agricultural aviation movements in the district plan.	Support	There is a need to provide for everyday activities that are integral to productive land use in the rural zone.	Accept the relief sought.
16	Horticulture New Zealand	OS26.6 OS26.7 OS27.8 OS27.9 OS26.15 OS26.16	The submitter seeks the inclusion of the following definitions in the district plan: <ul style="list-style-type: none"> • Artificial crop protection and crop support structures. • Audible bird scaring devices. • Frost fans. • Greenhouses. • Reverse sensitivity. • Rural produce sale. 	Support	There is a need to provide for everyday activities that are integral to productive land use in the rural zone. The inclusion of definitions for terms used in and relevant to primary production is essential.	Accept the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
17	Horticulture New Zealand	OS26.10 OS27.11	The submitter seeks a new definition for highly productive land and land based primary production that are consistent with the National Policy Statement for Highly Productive Land.	Support	The district plan is required to give effect and be consistent with the provisions of national policy statements. It would be appropriate to include definitions for highly productive land and land based primary production in the district plan which in consistent with the National Policy Statement for Highly Productive Land.	Accept the relief sought.
18	Horticulture New Zealand	OS27.12	The submitter seeks the inclusion of a definition for the National Grid which is consistent with the National Policy Statement on Electricity Transmission 2008. The submitter has provided a definition which has different setbacks for the National Grid depending on the Grid infrastructure.	Support	It is appropriate to define the setback from National Grid infrastructure based on what that infrastructure is. This will allow private property owners to better utilise their land rather than the standard 12-metre setback that is routinely sought for the entire National Grid corridor and the imposition of it could be said to breach common law private property rights.	Accept the relief sought OR with wording to similar effect.
19	Horticulture New Zealand	OS26.14	The submitter seeks a new definition for primary production which is consistent with the National Planning Standards.	Support	It is appropriate for definitions to be consistent with the definitions contained on the National Planning Standards.	Accept the relief sought.
20	Horticulture New Zealand	OS26.20	The submitter seeks that inclusion of a new objective that primary production and ancillary activities in the rural zone.	Support	It is important to recognise that primary production and ancillary activities have a functional and operational need to be in a rural environment. There are no other zones where it would be appropriate to locate these activities.	Accept relief sought.
21	Horticulture New Zealand	OS26.25	The submitter seeks the amendment of policy 3b.2.9 do that it provides for appropriate land use and subdivision activities in the rural zone. These activities should be carried out in a way that maintains or enhances the rural character of the rural zone.	Support	It is essential that rural character is maintained or enhanced on order to ensure rural based activities can continue to occur in the rural zone.	Accept the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
22	Horticulture New Zealand	OS26.26	The submitter seeks that inappropriate subdivision is avoided in the rural environment.	Oppose in part	The relief sought by the submitter seeks to avoid subdivision for rural lifestyle living. Farmers as they near retirement will look at subdividing off part of their farm so that they can build a residential dwelling and continue to live on their farm. Any provision seeking to avoid subdivision needs to provide for farmers to do this so they can realise their investment in the land.	Decline the relief sought.
23	Horticulture New Zealand	OS26.27	Submitter seeks the addition of a new policy to be consistent with National Policy Statement of Highly Productive Land and avoid incompatible activities locating in or near the rural environment	Support	It is appropriate for the District Plan to be consistent with the relevant National Policy Statements.	Accept the relief sought.
24	Horticulture New Zealand	OS26.29	The submitter seeks the amendment of policy 3b.2.13 to avoid and mitigate reverse sensitivity effects.	Support	It is important to ensure that rural activities can continue to occur and establish in the rural environment.	Accept relief sought.
25	Horticulture New Zealand	OS26.30	The submitter seeks amendment to policy 3b.2.14 so that commercial and industrial activities are avoided in the rural zone.	Support	Rural activities have a functional and operational need to be in the rural zone. It is essential that there is sufficient land in the rural zone to allow these activities to occur. Commercial and industrial activities are provided for in their own zones in the district plan and should be prevented from setting up in the rural zone.	Accept the relief sought.
26	Horticulture New Zealand	OS26.36	The submitter seeks provision for structures within the National Grid corridor – 4b.1.7 High voltage transmission lines	Support	The proposed setback of 12-metres form a critical electricity line or overtly restrictive and imposes on common private property rights. There are some activities such as non-habitable buildings ancillary to a farming activity which should be able to locate within the corridor if they do not prevent access to the corridor for maintenance, upgrading or repair.	Accept the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
27	Horticulture New Zealand	OS26.38	In respect of 4b.1.9 Earthworks within outstanding natural landscape the submitters seeks allowances for permitted activities for primary production earthworks and indigenous vegetation clearance.	Support	The is the ability to carry out earthworks and indigenous vegetation clearance without having significant adverse effects on an outstanding natural landscape. For example, while manuka and kanuka are seen as being under threat by the Department of Conservation, they are common and grown widely in New Zealand and at times there will be a need to clear some of them to allow private land to be utilised.	Accept relief sought.
28	Horticulture New Zealand	OS26.44	The submitter seeks the amendment of 4b.2.7 Minor residential units so that there are separate rules and standards for visitor accommodation seasonal accommodation and tiny homes/caravans.	Support	It needs to be recognised that different types of accommodation will come with different requirements. The district plan needs to recognise and provide for this and not group all minor residential accommodation into one group.	Accept the relief sought.
29	Horticulture New Zealand	OS26.44 OS26.53	The submitter seeks amendment to rules 4b.2.8 and 4b.2.9 so that commercial and industrial activities are restricted in the rural production zone. The rule as currently written conflicts with objective 3b.2.3.	Support	A rule should not conflict with an objective of a district plan. It is appropriate to amend the specified rule to remove this contradiction.	Accept the relief sought.
30	Horticulture New Zealand	OS26.47 OS26.48	The submitter seeks the inclusion of new rules for frost protection and bird scaring devices.	Support	It is appropriate that the district plan provisions for the general rural environment provide for all activities that can and will occur in that environment.	Accept the relief sought OR with wording to similar effect.
31	Horticulture New Zealand	OS26.55 OS26.56	In respect of rules 4b.5.1 and 4b.5.2, the submitter has queried why there are two rules for subdivision based in lot size, the submitter also notes that control activity status for activities adjacent to the rural environment will not avoid or mitigate any potential reverse sensitivity effects on activities	Support	It is appropriate that subdivision applications in the general rural environment are subject to matters of discretion that the Council must assess as well as being able to be declined if the adverse effects will significantly impact on existing activities.	Accept the relief sought OR with wording to similar effect.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
			being undertaken in the rural environment.			
32	Miraka Limited	OS35.5	The submitter feels that objective 3b.2.5, as proposed, does not clearly capture the concept of reverse sensitivity effects. The objective as proposed is overly wordy and should be amended to clarify its intent.	Support	An objective should be easy to understand and should focus solely on the issue it is intended to deal with.	Accept the relief sought OR with wording to similar effect.
33	Miraka Limited	OS35.9	The submitter seeks the amendment of policy 3b.2.13 so that it accurately reflects the risks of reverse sensitivity effects on lawfully established activities.	Support	It is important that the policy reflects why reverse sensitivity is to be avoided on existing activities is to be avoided.	Accept the relief sought OR with wording to similar effect.
34	Miraka Limited	OS35.10	In respect of policy 3b.2.14 the submitter seeks the amendment of the policy to exclude rural industry.	Support in part	Federated Farmers does not support the inclusion of commercial and industrial activities being allowed to establish in the rural environment. These activities have their own zones in which they can establish and should not be looking to utilise land not classified as commercial or industrial. If there is not enough commercial or industrial land available to meet demand then the Council should look at how this can be addressed which is not through allowing encroachment into the rural environment,	Decline the relief sought.
35	Miraka Limited	OS35.11	In respect of rule 4b.1.6, the submitter does not support the permitted activity status in respect of commercial and industrial activities.	Support in part	Federated Farmers does not support the inclusion of commercial and industrial activities being allowed to establish in the rural environment. These activities have their own zones in which they can establish and should not be looking to utilise land not classified as commercial or industrial.	Decline the relief sought.
36	Tuaropaki Trust	OS37.5	The submitter believes that the current objective limits the types of activities that can occur in the Rural	Support	Activities that do not have a legitimate need to be in the rural environment should not be able to do so. Land in the rural environment is	Accept the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
			Environment. The proposed amendment supports Objective 3b.2.3 which discourages activities that do not have a location need to be in the Rural Environment.		limited and is subject to several national planning standards and environmental standards which require matters to be done a certain way. Allowing for activities that do not have a need to be in the rural environment exacerbates restrictions on land use further which is unwarranted and inappropriate.	
37	Tuaropaki Trust	OS37.5	<p>The submitter supports the concept of avoiding reverse sensitivity effects. But feels that the proposed policy has been written to ensure all adverse effects are internalised which does not support Objective 3b.2.5.</p> <p>Policy 3b.2.13 has not been written to prevent reverse sensitivity effects from occurring. It does not protect lawfully established activities from reverse sensitivity effects from inappropriate development.</p>	Support	A policy on reverse sensitivity needs to be written appropriately so that it focuses on the avoidance of reverse sensitivity effects on lawfully established activities. It is not enough and is inappropriate for the policy to be only focused on the internalisation of effects which does nothing to assist lawfully established activities to continue operation.	Accept the relief sought.
38	Wairarapa Moana Incorporation Limited	OS47.19	In respect of rule 4b.2.6 dealing with minimum building setbacks, the submitter seeks the amendment to clarify what setbacks apply to other rules.	Oppose	The relief sought by the submitter captures all non-residential and non-habitable buildings. The position of the proposed setback on ancillary farming buildings is inappropriate and will restrict how private land can be used.	Decline the relief sought.
39	Permapine Limited	OS56.1	The submitter seeks the amendment of the definition of rural industry definition so that the definition includes existing activities in place at the time of plan notification.	Support in part	Support the intent of what is being sought but it needs to be clear that the definition applies to lawfully established existing activities that were in place at the time to plan change was notified. It would not be appropriate to provide for unlawful existing activities which would create issues for enforcement by the Council.	Accept in part the relief sought but ensure that the reference is to lawfully established existing activities in place at the time of plan notification.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
40	Permapine Limited	OS56.3	The submitter seeks that its activities, if determined by the Council to meet the rural industry definition should be recognised as having a locational need to be located within the general rural environment.	Oppose in part	Support the reference to rural industry needing to have a locational need to be located within the general rural zone. Do not support the reference to existing activities and their future operations being ensured a place in the general rural environment as this potentially would allow unlawful existing activities to gain a right to which they are not entitled.	Decline the relief sought.
41	Permapine Limited	OS56.5	In respect of 3b.1 Introduction the submitter seeks that only new industries should be limited, not lawfully established existing industries.	Support	Lawfully established activities in the general rural environment should be not limited arbitrarily as they are working within agreed constraints and avoiding, remedying, or mitigating their potential adverse effects on the environment. New activities have the potential to introduce new adverse effects into the existing environment which will impact on the land available for primary production.	Accept the relief sought.
42	Permapine Limited	OS56.8	The submitter seeks that it is considered to have a location need to located in the general rural environment as a rural industry.	Support in part	Federated Farmers does not support commercial and industrial activities being provide for in the general rural environment. If these activities are lawfully established and existing at the time the plan change was notified, then they will need to be provided for. However new commercial and industrial activities should be discouraged from establishing outside of the commercial and industrial zones provided for in the district plan.	Amend the relief sought so that it provides for the submitter only.
43	Permapine Limited	OS56.14	Submitters has sought confirmation that policy 3b.2.14 only applies to new activities and not the expansion of existing activities.	Oppose	Federated Farmers does not support commercial and industrial activities being provide for in the general rural environment. If these activities are lawfully established and existing at the time the plan change was	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
					notified, then they will need to be provided for. However new commercial and industrial activities and the expansion of activities located in the rural environment but that fall outside the definition of rural industry should be discouraged from establishing outside of the commercial and industrial zones provided for in the district plan.	
44	Manawa Energy Limited	OS57.8	The submitter seeks the amendment of objective 3b.2.1 so that it addresses the use of natural resources as well as enabling primary production.	Oppose	While renewable electricity generation activities have a functional need to locate in rural, it is not appropriate to give these activities that same primacy as primary production activities and seek land is put aside for them. The availability of land for primary production has become a significant issue due to Council allowing other non-rural activities to located in rural environments over time. As requiring authorities, electricity generators can use the designation process to acquire land which also means they will have to engage with private landowners which is appropriate.	Decline the relief sought.
45	Manawa Energy Limited	OS57.9	The submitter seeks the amendment of objective 3b.2.2 to allow for a range of activities in the general rural environment that are compatible with rural character.	Oppose	Renewable electricity generation activities are not compatible with rural character due to how physically intrusive they are.	Decline the relief sought.
46	Manawa Energy Limited	OS57.10	The submitter seeks a new objective that address renewable electricity generation and transmission activities in the general rural environment.	Oppose	As a network utility these matters are better addressed in the district wide rules, section 4e.14 Network Utilities.	Decline the relief sought.
47	Manawa Energy Limited	OS57.14	The submitter seeks the amendment of policy 3b.2.9 'Maintaining the established character' through adding structures associated with renewable	Oppose	The amendments are not necessary. Existing activities will have been lawfully established and/or consent and will be able to continue to operate. If will only be if these activities are	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
			electricity generation activities and geothermal areas and activities, electricity transmission and distribution		expanded that the maintaining of rural character may become an issue. Electricity generation and transmission are physical intrusive and are out of character with what the character and amenity of the rural environment is. They are not rural activities and should not be able to 'piggy-back' on the benefits and protections sought to be given to rural activities.	
48	Manawa Energy Limited	OS57.15	Again, the submitter seeks to constrain activities in the general rural zone that could constrain its ability to access or utilise renewable energy resources.	Oppose	The amendments sought are inappropriate as residential activities are provided for in the general rural environment. Restrictions on residential units just in case it may make it hard for a resource to be accessed, even if it is not currently being used is unwarranted and would be better dealt outside of the district plan through commercial agreements and contracts with private landowners.	Decline the relief sought.
49	Manawa Energy Limited	OS57.18	The submitter seeks the deletion of objective 3b.3.1 and that it is replaced with an objective focused on enabling rural residential activities.	Oppose	It is appropriate for a chapter dealing with the general rural and rural lifestyle environments to contain a specific objective focused on maintaining the character of the rural lifestyle environment. The new objective sought seeks to zone part of the rural zone to provide for rural lifestyle development as well as bring in the issue of reverse sensitivity effects on the general rural and industrial environments. These amendments are outside the scope of the original objective and are inappropriate.	Decline the relief sought.
50	Manawa Energy Limited	OS57.20	The submitter seeks the amendment of objective 3b.3.6 so that it applies to all infrastructure not just community infrastructure.	Oppose	The amendment sought to the objective seeks that the impacts of subdivision and development do not compromise the safe and efficient functioning of infrastructure.	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
					The widening of the scope of the objective to include all infrastructure can impact on existing lawfully established uses.	
51	Manawa Energy Limited	OS57.21	The submitter seeks the amendment of policy 3b.3.9 which deals with the character of the rural lifestyle environment to recognise and not have adverse effects on the surrounding general rural environment.	Oppose in part	Federated Farmers supports the intent behind this submission point by not the proposed amendments. The proposed amendment seeks reference to geothermal areas and renewable electricity generation activities which is inappropriate as these are commercial activities which are required to make a profit.	Decline the relief as currently worded.
52	Manawa Energy Limited	OS57.25	The submitter seeks an amendment to rule 4b.1.2 that as minor residential units are sensitive activities their establishment needs to be controlled to not result in reverse sensitivity effects. The submitter also seeks an additional to ensure that minor residential units do not constrain access to and/or the utilisation of renewable energy sources.	Oppose in part	The inclusion of a reference to reverse sensitivity effects in the rule is support. The inclusion of an additional criterion relating to constraining access to and /or the utilisation of renewable energy resources is not.	Decline the relief as currently worded.
53	Manawa Energy Limited	OS57.25	The submitter seeks the inclusion of a permitted activity rule for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators.	Oppose	There needs to be a way for Councils and private landowners to know what is being done on privately owned land in terms of renewable electricity generation. The minimum classification should be a controlled activity with one of the matters for assessment being consultation with the appropriate iwi and landowners.	Decline the relief sought.
54	Manawa Energy Limited	OS57.28 OS57.29	The submitter seeks that renewable electricity generation is exempted from rule 4b.1.7 High voltage transmission lines and rule 4b.1.9 Earthworks within Outstanding Landscape Areas.	Oppose	The amendment sought is opposed as one activity should not be given priority over rules which other activities are required to comply with. While renewable electricity generation is a matter of national importance, the related national policy statement does not elevate its	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
					activities over and above other resource management requirements.	
55	Manawa Energy Limited	OS57.39 OS57.40	The submitter seeks an additional matter of control to be added to rule 4b.5.1 and rule 4b.5.2 which refers to any effects on the functioning of the rural environment including adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources.	Oppose	The submitter is seeking to elevate renewable electricity generation activities and access to renewable electricity resources over primary production activities which also will have a need to access natural resources and potentially the same resources in some situations. There needs to be a balance achieved amongst all the competing uses. Having a national policy statement does not bestow the right on renewable electricity generators to automatically get access to natural resource first and over and above other users.	Decline the relief sought.
56	Manawa Energy Limited	OS57.46	The submitter seeks the inclusion of a new definition for reverse sensitivity on the district plan. The definition put forward is the one that it in the Waikato Regional Policy Statement.	Support	It is important to have essential terms defined in the district plan. As the district plan is required to give effect to the Waikato Regional Policy Statement, it makes sense to use the definition of reverse sensitivity contained in that document.	Accept relief sought.
57	Mercury Energy	OS68.14	The submitter seeks the amendment of General Rural and Rural Lifestyle Environments 3b.1 Introduction to provide for renewable electricity generation activities.	Oppose	The purpose of a rural environment is to support rural activities such as agricultural and horticultural. While renewable electricity generation activities have a functional need to locate where the renewable resource is located, it is not rural activity and should not be given recognition as such.	Decline the relief sought.
58	Mercury Energy	OS68.15	The submitter seeks the amendment of objective 3b.2.1 so that it addresses the use of natural resources as well as enabling primary production.	Oppose	While renewable electricity generation activities have a functional need to locate in rural, it is not appropriate to give these activities that same primacy as primary production activities and seek land is put aside for them. The availability of land for primary production has become a significant issue due	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
					to Council allowing other non-rural activities to located in rural environments over time. As requiring authorities, electricity generators can use the designation process to acquire land which also means they will have to engage with private landowners which is appropriate.	
59	Mercury Energy	OS68.15	The submitter seeks the amendment of objective 3b.2.2 to allow for a range of activities in the general rural environment that are compatible with rural character.	Oppose	Renewable electricity generation activities are not compatible with rural character due to how physically intrusive they are.	Decline the relief sought.
60	Mercury Energy	OS68.17	The submitter seeks a new objective that address renewable electricity generation and transmission activities in the general rural environment.	Oppose	As a network utility these matters are better addressed in the district wide rules, section 4e.14 Network Utilities.	Decline the relief sought.
61	Mercury Energy	OS68.21	The submitter seeks the amendment of policy 3b.2.9 'Maintaining the established character' through adding structures associated with renewable electricity generation activities and geothermal areas and activities, electricity transmission and distribution	Oppose	The amendments are not necessary. Existing activities will have been lawfully established and/or consent and will be able to continue to operate. If will only be if these activities are expanded that the maintaining of rural character may become an issue. Electricity generation and transmission are physical intrusive and are out of character with what the character and amenity of the rural environment is. They are not rural activities and should not be able to 'piggy-back' on the benefits and protections sought to be given to rural activities.	Decline the relief sought.
62	Mercury Energy	OS68.22	The submitter seeks that policy 3b.3.10 to constrain activities in the general rural zone that could constrain it ability	Oppose	The amendments sought are inappropriate as residential activities are provided for in the general rural environment. Restrictions on residential units just in case it may make it hard for a resource to be access, even it is not	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
			to access or utilise renewable energy resources.		currently being used is unwarranted and would be better dealt outside of the district plan through commercial agreements and contracts with private landowners.	
63	Mercury Energy	OS68.25	The submitter seeks the amendment of policy 3b.2.14 Commercial and industrial activity so that renewable electricity generation activities are excluded for being considered as commercial and/or industrial activities.	Oppose	<p>Federated Farmers does not support providing for commercial and industrial activities in the general rural environment. The rural environment is the only place where primary production can occur while commercial and industrial activities are provided for in commercial and industrial zones.</p> <p>Renewable electricity generation activities may have a functional need to be in different environments including the rural environment. This should not mean that they should automatically be considered to be an appropriate activity that should be allowed to occur in the rural environment.</p>	Decline the relief sought.
64	Mercury Energy	OS68.27	The submitter seeks the deletion of objective 3b.3.1 and that it is replaced with an objective focused on enabling rural residential activities.	Oppose	<p>It is appropriate for a chapter dealing with the general rural and rural lifestyle environments to contain a specific objective focused on maintaining the character of the rural lifestyle environment.</p> <p>The new objective sought seeks to zone part of the rural zone to provide for rural lifestyle development as well as bring in the issue of reverse sensitivity effects on the general rural and industrial environments. These amendments are outside the scope of the original objective and are inappropriate.</p>	Decline the relief sought.
65	Mercury Energy	OS68.31	The submitter seeks the amendment of objective 3b.3.6 so that it applies to all	Oppose	The amendment sought to the objective seek that the impacts of subdivision and development do not compromise the safe and efficient functioning of infrastructure. The	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
			infrastructure not just community infrastructure.		widening of the scope of the objective to include all infrastructure will have an impact on existing lawfully established uses.	
66	Mercury Energy	OS68.32	The submitter seeks the amendment of policy 3b.3.9 which deals with the character of the rural lifestyle environment to recognise and not have adverse effects on the surrounding general rural environment.	Oppose in part	Federated Farmers supports the intent behind this submission point by not the proposed amendments. The proposed amendment seeks reference to geothermal areas and renewable electricity generation activities which is inappropriate as these are commercial activities which are required to make a profit.	Decline the relief as currently worded.
67	Mercury Energy	OS68.36	The submitter seeks an amendment to rule 4b.1.2 that as minor residential units are sensitive activities their establishment needs to be controlled to not result in reverse sensitivity effects. The submitter also seeks an additional to ensure that minor residential units do not constrain access to and/or the utilisation of renewable energy sources.	Oppose in part	The inclusion of a reference to reverse sensitivity effects in the rule is support. The inclusion of an additional criterion relating to constraining access to and /or the utilisation of renewable energy resources is not.	Decline the relief as currently worded.
68	Mercury Energy	OS68.38	The submitter seeks the inclusion of a permitted activity rule in rule 4b.1.4 for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators.	Oppose	There needs to be a way for Councils and private landowners to know what is being done on privately owned land in terms of renewable electricity generation. The minimum classification should be a controlled activity with one of the matters for assessment being consultation with the appropriate iwi and landowners.	Decline the relief sought.
69	Mercury Energy	OS68.40 OS68.41 OS68.42	The submitter seeks that renewable electricity generation is exempted from rule 4b.1.7 High voltage transmission lines, rule 4b.1.8 Buildings within Outstanding Landscape Areas and rule 4b.1.9 Earthworks within Outstanding Landscape Areas.	Oppose	The amendment sought is opposed as one activity should not be given priority exemption over rules which other activities are required to comply with. While renewable electricity generation is a matter of national importance, the related national policy statement does not	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
					elevate its activities over and above other resource management requirements.	
70	Mercury Energy	OS68.50	The submitter seeks an additional matter of control to be added to rule 4b.5.1 which refers to any effects on the functioning of the rural environment including adverse effects on infrastructure, renewable electricity generation activities and access to renewable energy resources.	Oppose	The submitter is seeking to elevate renewable electricity generation activities and access to renewable electricity resources over primary production activities which also will have a need to access natural resources and potentially the same resources in some situations. There needs to be a balance achieved amongst all the competing uses. Having a national policy statement does not bestow the right on renewable electricity generators to automatically get access to natural resource first and over and above other users.	Decline the relief as sought.
71	Mercury Energy	OS68.64	The submitter seeks the inclusion of a new definition for reverse sensitivity on the district plan. The definition put forward is the one that it in the Waikato Regional Policy Statement.	Support	It is important to have essential terms defined in the district plan. As the district plan is required to give effect to the Waikato Regional Policy Statement, it makes sense to use the definition of reverse sensitivity contained in that document.	Accept relief sought.
72	Jan Curtis	OS73.7	Add a policy which recognises as appropriate and enables, limited rural residential subdivision and development on sites with marginal or limited productive capacity where the size of the lots constrain productive use.	Support	The relief sought will allow rural landowners to realise income from parts of their properties where the soil is of limited productive capacity.	Accept the relief sought OR With wording with similar intent.
73	Genesis Energy	OS84.11	The submitter opposes the inclusion of "geothermal / electricity generation" within the definition of Rural Industry. The proposed definition is inconsistent with the National Planning Standard definition for Rural Industry.	Support	The definitions used in the district plan should be consistent with the National Planning Standards as local authorities are required to comply with the standards within certain timeframes.	Accept the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
74	Genesis Energy	OS84.12	The submitter seeks the amendment of General Rural and Rural Lifestyle Environments 3b.1 Introduction to provide for renewable electricity generation activities.	Oppose	The purpose of a rural environment is to support rural activities such as agricultural and horticultural. While renewable electricity generation activities have a functional need to locate where the renewable resource is located, it is not rural activity and should not be given recognition as such.	Decline the relief sought.
75	Genesis Energy	OS84.13	The submitter seeks the amendment of objective 3b.2.1 so that it addresses the use of natural resources as well as enabling primary production.	Oppose	While renewable electricity generation activities have a functional need to locate in rural, it is not appropriate to give these activities that same primacy as primary production activities and seek land is put aside for them. The availability of land for primary production has become a significant issue due to Council allowing other non-rural activities to located in rural environments over time. As requiring authorities, electricity generators can use the designation process to acquire land which also means they will have to engage with private landowners which is appropriate.	Decline the relief sought.
76	Genesis Energy	OS84.14	The submitter seeks the amendment of objective 3b.2.2 so that it refers to rural character rather than the maintenance of the established rural character. It is also sought that the objective focuses on enabling a range of productive activities in the general rural environment that are compatible with rural character.	Oppose	It is appropriate to have an objective that is focused on maintaining the established rural character. The rural environment has been and still is under threat from competing demands from non-rural activities. The suggested amendment to the objective has the potential to further dilute the established rural character as a judgment will be required as to whether an activity is 'compatible' with rural character. This may vary from person to person unless appropriate guidance exists.	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
77	Genesis Energy	OS84.15	The submitter seeks a new objective that address renewable electricity generation and transmission activities in the general rural environment.	Oppose	As a network utility these matters are better addressed in the district wide rules, section 4e.14 Network Utilities.	Decline the relief sought.
78	Genesis Energy	OS84.19	The submitter seeks the amendment of policy 3b.2.9 'Maintaining the established character' through adding structures associated with renewable electricity generation activities and geothermal areas and activities, electricity transmission and distribution	Oppose	The amendments are not necessary. Existing activities will have been lawfully established and/or consent and will be able to continue to operate. If will only be if these activities are expanded that the maintaining of rural character may become an issue. Electricity generation and transmission are physical intrusive and are out of character with what the character and amenity of the rural environment is. They are not rural activities and should not be able to 'piggy-back' on the benefits and protections sought to be given to rural activities.	Decline the relief sought.
79	Genesis Energy	OS84.20	The submitter seeks that policy 3b.3.10 to constrain activities in the general rural zone that could constrain it ability to access or utilise renewable energy resources.	Oppose	The amendments sought are inappropriate as residential activities are provided for in the general rural environment. Restrictions on residential units just in case it may make it hard for a resource to be access, even it is not currently being used is unwarranted and would be better dealt outside of the district plan through commercial agreements and contracts with private landowners.	Decline the relief sought.
80	Genesis Energy	OS84.23	The submitter seeks the amendment of policy 3b.2.14 Commercial and industrial activity so that renewable electricity generation activities are excluded for being considered as commercial and/or industrial activities.	Oppose	Federated Farmers does not support providing for commercial and industrial activities in the general rural environment. The rural environment is the only place where primary production can occur while commercial and industrial activities are provided for in commercial and industrial zones.	The submitter seeks the amendment of policy 3b.2.14 Commercial and industrial activity so that renewable electricity generation activities are excluded for being

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
					Renewable electricity generation activities may have a functional need to be in different environments including the rural environment. This should not mean that they should automatically be considered to be an appropriate activity that should be allowed to occur in the rural environment.	considered as commercial and / or industrial activities.
81	Genesis Energy	OS84.25	The submitter seeks the deletion of objective 3b.3.1 and that it is replaced with an objective focused on enabling rural residential activities.	Oppose	<p>It is appropriate for a chapter dealing with the general rural and rural lifestyle environments to contain a specific objective focused on maintaining the character of the rural lifestyle environment.</p> <p>The new objective sought seeks to zone part of the rural zone to provide for rural lifestyle development as well as bring in the issue of reverse sensitivity effects on the general rural and industrial environments. These amendments are outside the scope of the original objective and are inappropriate.</p>	Decline the relief sought.
82	Genesis Energy	OS84.30	The submitter seeks the amendment of policy 3b.3.9 Character of the Rural Lifestyle Environment so that it refers to geothermal steamfields and renewable electricity generation activities being part of the rural environment.	Oppose	While renewable electricity generation activities have a functional need to be in the rural environment as that is where the resources are located, it should not be said that they are part of the rural character. The infrastructure needed for renewable electricity generation is physically intrusive and is out of character with the character of the rural environment.	Decline the relief sought.
83	Genesis Energy	OS84.35	The submitter seeks the inclusion of a permitted activity rule in rule 4b.1.4 for activities that involve the continued operation, maintenance, and minor upgrading of existing electricity generation core sites, geothermal steamfields areas, renewable energy	Oppose	There needs to be a way for Councils and private landowners to know what is being done on privately owned land in terms of renewable electricity generation. The minimum classification should be a controlled activity with one of the matters for assessment	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
			<p>electricity generation activities and associated structures and ancillary activities.</p> <p>The submission also seeks amendment to the definition of minor upgrading.</p>		<p>being consultation with the appropriate iwi and landowners.</p> <p>The amendment sought to the definition of minor upgrading is broad and has the potential to allow activities to occur that have more than minor effects on the environment.</p>	
84	Genesis Energy	OS84.37 OS84.38 OS84.39	The submitter seeks that renewable electricity generation is exempted from rule 4b.1.7 High voltage transmission lines, rule 4b.1.8 Buildings within Outstanding Landscape Areas and rule 4b.1.9 Earthworks within Outstanding Landscape Areas.	Oppose	The amendment sought is opposed as one activity should not be given priority exemption over rules which other activities are required to comply with. While renewable electricity generation is a matter of national importance, the related national policy statement does not elevate its activities over and above other resource management requirements.	Decline the relief sought.
85	Genesis Energy	OS84.48	The submitter seeks the inclusion of a new definition for reverse sensitivity on the district plan. The definition put forward is the one that it in the Waikato Regional Policy Statement.	Support	It is important to have essential terms defined in the district plan. As the district plan is required to give effect to the Waikato Regional Policy Statement, it makes sense to use the definition of reverse sensitivity contained in that document.	Accept relief sought.
86	Contact Energy Limited	OS93.26	The submitter seeks the amendment of General Rural and Rural Lifestyle Environments 3b.1 Introduction to provide for renewable electricity generation activities.	Oppose	The purpose of a rural environment is to support rural activities such as agricultural and horticultural. While renewable electricity generation activities have a functional need to locate where the renewable resource is located, it is not rural activity and should not be given recognition as such.	Decline the relief sought.
87	Contact Energy Limited	OS93.27	The submitter seeks the amendment of objective 3b.2.1 so that it addresses the use of natural resources as well as enabling primary production.	Oppose	While renewable electricity generation activities have a functional need to locate in rural, it is not appropriate to give these activities that same primacy as primary production activities and seek land is put aside for them. The availability of land for primary production has become a significant issue due	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
					to Council allowing other non-rural activities to located in rural environments over time. As requiring authorities, electricity generators can use the designation process to acquire land which also means they will have to engage with private landowners which is appropriate.	
88	Contact Limited Energy	OS93.28	The submitter seeks the amendment of objective 3b.2.2 so that it refers to rural character rather than the maintenance of the established rural character. It is also sought that the objective focuses on enabling a range of productive activities in the general rural environment that are compatible with rural character.	Oppose	It is appropriate to have an objective that is focused on maintaining the established rural character. The rural environment has been and still is under threat from competing demands from non-rural activities. The suggested amendment to the objective has the potential to further dilute the established rural character as a judgment will be required as to whether an activity is 'compatible' with rural character. This may vary from person to person unless appropriate guidance exists.	Decline the relief sought.
89	Contact Limited Energy	OS93.29	The submitter seeks a new objective in Objective 3b.2.3 Rural Industry that addresses renewable electricity generation and transmission activities in the general rural environment.	Oppose	As a network utility these matters are better addressed in the district wide rules, section 4e.14 Network Utilities.	Decline the relief sought.
90	Contact Limited Energy	OS93.33	The submitter seeks the amendment of policy 3b.2.9 'Maintaining the established character' through adding structures associated with renewable electricity generation activities and geothermal areas and activities, electricity transmission and distribution	Oppose	The amendments are not necessary. Existing activities will have been lawfully established and/or consent and will be able to continue to operate. If will only be if these activities are expanded that the maintaining of rural character may become an issue. Electricity generation and transmission are physical intrusive and are out of character with what the character and amenity of the rural environment is. They are not rural activities	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
					and should not be able to 'piggy-back' on the benefits and protections sought to be given to rural activities.	
91	Contact Energy Limited	OS93.34	The submitter seeks that policy 3b.3.10 to constrain activities in the general rural zone that could constrain its ability to access or utilise renewable energy resources.	Oppose	The amendments sought are inappropriate as residential activities are provided for in the general rural environment. Restrictions on residential units just in case it may make it hard for a resource to be accessed, even if it is not currently being used is unwarranted and would be better dealt outside of the district plan through commercial agreements and contracts with private landowners.	Decline the relief sought.
92	Contact Energy Limited	OS93.37	The submitter seeks the amendment of policy 3b.2.14 Commercial and industrial activity so that renewable electricity generation activities are excluded for being considered as commercial and/or industrial activities.	Oppose	Federated Farmers does not support providing for commercial and industrial activities in the general rural environment. The rural environment is the only place where primary production can occur while commercial and industrial activities are provided for in commercial and industrial zones. Renewable electricity generation activities may have a functional need to be in different environments including the rural environment. This should not mean that they should automatically be considered to be an appropriate activity that should be allowed to occur in the rural environment.	The submitter seeks the amendment of policy 3b.2.14 Commercial and industrial activity so that renewable electricity generation activities are excluded for being considered as commercial and/or industrial activities.
93	Contact Energy Limited	OS93.39	The submitter seeks the deletion of objective 3b.3.1 and that it is replaced with an objective focused on enabling rural residential activities.	Oppose	It is appropriate for a chapter dealing with the general rural and rural lifestyle environments to contain a specific objective focused on maintaining the character of the rural lifestyle environment. The new objective sought seeks to zone part of the rural zone to provide for rural lifestyle development as well as bring in the issue of	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
					reverse sensitivity effects on the general rural and industrial environments. These amendments are outside the scope of the original objective and are inappropriate.	
94	Contact Energy Limited	OS93.44	The submitter seeks the amendment of policy 3b.3.9 Character of the Rural Lifestyle Environment so that it refers to geothermal steamfields and renewable electricity generation activities being part of the rural environment.	Oppose	While renewable electricity generation activities have a functional need to be in the rural environment as that is where the resources are located, it should not be said that they are part of the rural character. The infrastructure needed for renewable electricity generation is physically intrusive and is out of character with the character of the rural environment.	Decline the relief sought.
95	Contact Energy Limited	OS93.50	The submitter seeks the inclusion of a permitted activity rule in rule 4b.1.4 for activities that involve the continued operation, maintenance, and minor upgrading of existing electricity generation core sites, geothermal steamfields areas, renewable energy electricity generation activities and associated structures and ancillary activities. The submission also seeks amendment to the definition of minor upgrading.	Oppose	There needs to be a way for Councils and private landowners to know what is being done on privately owned land in terms of renewable electricity generation. The minimum classification should be a controlled activity with one of the matters for assessment being consultation with the appropriate iwi and landowners. The amendment sought to the definition of minor upgrading is broad and has the potential to allow activities to occur that have more than minor effects on the environment.	Decline the relief sought.
96	Contact Energy Limited	OS93.52 OS93.53 OS93.54	The submitter seeks that renewable electricity generation is exempted from rule 4b.1.7 High voltage transmission lines, rule 4b.1.8 Buildings within Outstanding Landscape Areas and rule 4b.1.9 Earthworks within Outstanding Landscape Areas.	Oppose	The amendment sought is opposed as one activity should not be given priority exemption over rules which other activities are required to comply with. While renewable electricity generation is a matter of national importance, the related national policy statement does not elevate its activities over and above other resource management requirements.	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
97	Contact Energy Limited	OS93.78	The submitter seeks the inclusion of a new definition for reverse sensitivity on the district plan. The definition put forward is the one that it in the Waikato Regional Policy Statement.	Support	It is important to have essential terms defined in the district plan. As the district plan is required to give effect to the Waikato Regional Policy Statement, it makes sense to use the definition of reverse sensitivity contained in that document.	Accept relief sought.
98	Heritage New Zealand Pouhere Taonga	OS96.8 OS96.9	The submitter seeks the amendment of 3b.2 Objectives and policies so that historic heritage is protected from the effects of subdivision, use and development (objective) and ensure that subdivision, use, and development are designed to avoid historic heritage and that any historic heritage is retained within one lot.	Oppose	What the submitter is seeking in respect of historic heritage is inappropriate. Section 6(f) of the Resource Management Act 1991 requires the protection of historic heritage from inappropriate subdivision, use, and development. The wording put forward by the submitter for these appeal points has not made this distinction and has the potential to adversely impact on private landowners being able to utilise their land.	Decline the relief as currently worded.
99	Rural Contractors New Zealand Incorporated	OS109.4 OS109.5 OS109.8	The submitter considers Policy 3b.2.14, Rule 4b.1.5 and performance standard 4b.2.5 should be amended to provide certainty that it does not apply to rural industry.	Support	It is appropriate that commercial and industrial activities are limited if not fully excluded from establishing in the general rural zone.	Accept the relief sought OR with wording with similar intent.
100	Transpower New Zealand Limited	OS110.9	The submitter has requested a new definition for the National Grid Subdivision Corridor, to give effect to the National Policy Statement for Electricity Transmission and to support the new rules it has requested in its submission points.	Oppose	The proposed definition contains setbacks more than 35 metres from transmission lines on towers. This is an inappropriate imposition on private landowners who will be severely restricted in how they are able to utilise their land.	Decline the relief sought.
101	Transpower New Zealand Limited	OS110.9	The submitter seeks a new definition for the national grid yard which contains a minimum setback of 12 metres.	Oppose	The submitter is unrealistic in requiring a constant 12 metre setback. In other district plans such as the operative Waipa District Plan the approved setbacks ranged from 10 to 12 metres depending on the circumstances. It is important for the submitter to acknowledge and realise that they do not own	

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
					most of the land its infrastructure is located on, and that compromise is needed to ensure all parties are agreeable.	
102	Transpower New Zealand Limited	OS110.14	The submitter seeks amendments to 3b.1 Introduction to the general rural and rural lifestyle environments so that its electricity transmission activities are not constrained by the function of the rural environment.	Oppose	While acknowledging that electricity transmission infrastructure has a functional need to be in the general rural environment, these activities should not be given precedence over the functioning of the rural environment.	Decline the relief sought.
103	Transpower New Zealand Limited	OS110.15	The submitter seeks new objectives, policies and rules that are specific to the National Grid and that give effect to the National Policy Statement on Electricity Transmission in Objective 3b.2.4.	Oppose	It would be more appropriate to address all matters associated with the National Grid in an infrastructure chapter rather than seeking to repurpose the chapter on the general rural and rural lifestyle environments to focus on the national grid.	Decline the relief sought.
104	Transpower New Zealand Limited	OS110.16	The submitter seeks either that there is a district wide chapter on infrastructure or requests that a policy specific to the National Grid is included in chapter 3b.2. the policy should seek to manage effects of activities on the National Grid to ensure its continued safe and efficient operation.	Oppose	It would be more appropriate to address all matters associated with the National Grid in an infrastructure chapter rather than seeking to repurpose the chapter on the general rural and rural lifestyle environments to focus on the national grid. The National Grid is not the only user of resources within the general rule environment and a balance needs to be achieved that the operation of the Grid does not adversely impact on other legally established rural activities.	Decline the relief sought.
105	Transpower New Zealand Limited	OS110.20 OS110.21 OS110.22 OS110.23	The submitter requests new rules and performance standards in 4b.1 General Rules General Rural Environment and 4b.2 Performance Standards General Rural Environment to reflect the requirements of the NPSET, particularly policies 10 and 11.	Oppose	The relief sought is one perspective of achieving the policies of the National Policy Statement on Electricity Transmission. There will be other ways achieving the same effect without imposing such severe restrictions. It should also be noted that the relief attempts to work around the provisions in the Resource	Decline the relief sought.

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support/ Oppose	Reasons for further submission made	Relief sought
					<p>Management Act 1991 which provide the process on how affected parties and notification are determined. The Council is required to follow the processes defined in the Act and the relief sought by the submitter is inappropriate.</p> <p>The relief sought will not achieve consistency with other district plans as what the submitter has sought has been challenged through the district plan, plan change process.</p>	
106	Transpower New Zealand	OS110.24	The submitter seeks the insertion of a new rule in 4b.5 Subdivision Rules to address subdivision in the national grid substation buffer.	Oppose	The submitter seeks to impose further restrictions on private land without engaging with private landowners. It should also be noted that the relief attempts to work around the provisions in the Resource Management Act 1991 which provide the process on how affected parties and notification are determined. The Council is required to follow the processes defined in the Act and the relief sought by the submitter is inappropriate.	Decline relief sought.
107	Transpower New Zealand	OS110.25	Transpower seeks a new subdivision rule in 4b.5 Subdivision Rules for the subdivision of land within the National Grid Subdivision Corridor.	Oppose	The submitter seeks to impose further restrictions on private land without engaging with private landowners. It should also be noted that the relief attempts to work around the provisions in the Resource Management Act 1991 which provide the process on how affected parties and notification are determined. The Council is required to follow the processes defined in the Act and the relief sought by the submitter is inappropriate.	Decline the relief sought.



Proposed Plan Change 41 'Removal of Fault Lines' to the Taupō District Plan

Further submissions on behalf of Federated Farmers of New Zealand

4 April 2023



0800
327
646 | **FED
FARM**
.ORG.NZ

FURTHER SUBMISSION

TELEPHONE 0800 327 646 | WEBSITE WWW.FEDFARM.ORG.NZ

To: Taupō District Council
30 Tongariro Street
Taupō 3330

Private Bag 2005
Taupō 3352

Via email: districtplan@taupo.govt.nz

Further Submissions on: **Proposed Plan Change 41 – Removal of Fault Lines**

Date: 4 April 2023

Submission by: Federated Farmers of New Zealand – Rotorua / Taupō

COLIN GUYTON

ROTORUA / TAUPŌ PROVINCIAL PRESIDENT

Federated Farmers of New Zealand

M 027 275 6546

E jcookmunro@fedfarm.org.nz

Address for service:

JO-ANNE COOK MUNRO

SENIOR POLICY ADVISOR / SOLICITOR

Federated Farmers of New Zealand

M 027 331 0084

E jcookmunro@fedfarm.org.nz

1. INTRODUCTION

- 1.1 Federated Farmers welcomes the opportunity to provide further submissions on Proposed Plan Change 41 'Removal of Fault Lines' (PC41) to the Taupō District Plan.
- 1.2 Federated Farmers of New Zealand (**Federated Farmers**) has an interest in PC41 to the Taupō District Plan that is greater than the interest the general public has.
- 1.3 Federated Farmers is a primary sector organisation with a long and proud history of representing the needs and interests of New Zealand farmers involved in a range of rural businesses. We are a pan sector organisation that works with farmers to ensure practical and workable outcomes.
- 1.4 Federated Farmers aims to add value to its members' farming businesses. Its key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
 - (a) our members may operate their business in a fair and flexible commercial environment;



- (b) our members' families and their staff have access to services essential to the needs of the rural community; and
 - (c) our members adopt responsible management and environmental practices.
- 1.5 FFNZ made submissions on PC 41 and has been assigned the submitter number 91 as shown in the submitter's details document on the Council's website.
 - 1.6 Section 2 contains the table that sets out Federated Farmers' further submissions in respect of submission points made by other parties on PC41. The table also indicates whether Federated Farmers supports or opposes these primary submissions, the reasons for the position that it has taken, and the relief sought.
 - 1.7 Federated Farmers wishes to be heard in support of these further submissions. If others are making a similar submission, Federated Farmers will consider presenting a joint case with them at the hearing.
 - 1.8 Federated Farmers could not gain an advantage in trade competition through these further submissions.
 - 1.9 FFNZ can confirm that copies of this further submission have been served on the parties who made the original submission.

Dated: 4 April 2023

Jo-Anne Cook-Munro

Solicitor

2. FURTHER SUBMISSIONS

Plan Change 41 – Removal of fault lines

Further Submission Point	Submitter	Submission Number	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
1	Toka Tū Ake EQC	OS16.1	The submitter opposes the proposed removal of the regulatory fault overlays from the District Plan. The proposal is contrary to the Ministry for the Environment's Active Fault Guidelines and will weaken the provisions in the District Plan to minimise the risk from earthquakes to people and property in the Taupo District.	Support	The inclusion of fault lines in the District Plan provides a level of certainty to landowners and potential landowners.	Accept the relief sought.
2	Toka Tū Ake EQC	OS16.2	The submitter seeks the retention of the regulatory fault overlay maps in the district plan, as well as all rules in the district plan that pertain to the fault hazard overlay. The submitter also sought that the Council follow the recommendations of GNS Science in a 2020 report ¹ and replace the fault lines in the operative District Plan with the new and more accurate fault lines mapped in the report.	Support	The inclusion of fault lines in the District Plan provides a level of certainty to landowners and potential landowners.	Accept the relief sought.
3	Cheal Consultants	OS79.7	The submitter seeks the inclusion, as a minimum, a reference to fault lines under other information.	Support in part	The inclusion of fault lines in the District Plan provides a level of certainty to landowners and potential landowners.	Accept the relief sought.

¹ Litchfield N J, Morgenstern R, Villamor P, Van Dissen R J, Townsend D B and Kelly S D (2020) *Active fault hazards in the Taupo district* GNS Science Consultancy report 2020/31 (August 2020, Lower Hutt, New Zealand, 114p).

Krystal Foden

From: Hilary Samuel
Sent: Friday, 28 April 2023 10:37 AM
To: District Plan
Subject: FW: Further submission

Categories: Krystal

Fed Farmers further sub clarifications. See table in body of email.

Hilary Samuel Senior Policy Advisor

My office hours are school hours Monday, Tuesday, Thursday and Friday.

Taupō District Council • 30 Tongariro Street, Taupō 3330
Private Bag 2005 • Taupō Mail Centre • Taupō 3352 • New Zealand

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From: Jo Cook Munro <jcookmunro@fedfarm.org.nz>
Sent: Friday, 28 April 2023 10:33 AM
To: Hilary Samuel <hsamuel@taupo.govt.nz>
Subject: RE: Further submission

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 Hillary, it would be an allow. Do you need me to resubmit the further submissions to take out the support or oppose in part and the other amendments required?

Jo

From: Hilary Samuel <hsamuel@taupo.govt.nz>
Sent: Friday, April 28, 2023 9:57 AM
To: Jo Cook Munro <jcookmunro@fedfarm.org.nz>
Subject: RE: Further submission

Thanks Jo. I just need an allow or disallow for point 220.69. I assume that as you have supported you are ok to allow the relief sought?

Hilary Samuel Senior Policy Advisor

My office hours are school hours Monday, Tuesday, Thursday and Friday.

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Private Bag 2005 • Taupō Mail Centre • Taupō 3352 • New Zealand

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From: Jo Cook Munro <jcookmunro@fedfarm.org.nz>
Sent: Friday, 28 April 2023 9:51 AM
To: Hilary Samuel <hsamuel@taupo.govt.nz>
Subject: RE: Further submission

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Hi Hilary

Thank you for sending this through. I am fine with the amendments you proposed. My apologies for the errors.

Ngā mihi

Jo

From: Hilary Samuel <hsamuel@taupo.govt.nz>
Sent: Friday, April 28, 2023 9:44 AM
To: Jo Cook Munro <jcookmunro@fedfarm.org.nz>
Subject: Further submission

Hi Jo-Anne

Just going through your further submission on PC42. You have some points that are not compliant with the RMA form. I have pasted below with proposed amendments to ensure they are compliant. I need confirmation you are comfortable with these changes asap please, by COP Monday at the latest. Can you please confirm if you agree, and there is also one question in red. The main issue is that you cannot use "in part" only support or oppose and you cannot seek amendment to someone else's relief, only for it to be allowed or disallowed.

220	Cook Munro	Jo- Anne	Jo- Anne Cook Munro for Federated Farmers of New Zealand	Jo- Anne Cook Munro for Federated Farmers of New Zealand 444 Anglesea Street Hamilton New Zealand 3240	Federated Farmers of New Zealand	jcookmunro@fedfarm.org.nz	26.26	FS220.46	Seek amendment	C
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220	Cook Munro	Jo- Anne	Jo- Anne Cook Munro for Federated Farmers of New Zealand	Jo- Anne Cook Munro for Federated Farmers of New Zealand 444 Anglesea Street Hamilton New Zealand 3240	Federated Farmers of New Zealand	jcookmunro@fedfarm.org.nz	35.10	FS220.61	Support	S
211	Cook Munro	Jo- Anne	Jo- Anne Cook Munro for Federated Farmers of New Zealand	Jo- Anne Cook Munro for Federated Farmers of New Zealand 444 Anglesea Street Hamilton New Zealand 3240	Federated Farmers of New Zealand	jcookmunro@fedfarm.org.nz	35.11	FS220.62	Seek amendment	S
220	Cook Munro	Jo- Anne	Jo- Anne Cook Munro for Federated Farmers of New Zealand	Jo- Anne Cook Munro for Federated Farmers of New Zealand 444 Anglesea Street	Federated Farmers of New Zealand	jcookmunro@fedfarm.org.nz	56.10	FS220.66	Seek amendment	S

				Hamilton New Zealand 3240						
220	Cook Munro	Jo- Anne	Jo- Anne Cook Munro for Federated Farmers of New Zealand	Jo- Anne Cook Munro for Federated Farmers of New Zealand 444 Anglesea Street Hamilton New Zealand 3240	Federated Farmers of New Zealand	jcookmunro@fedfarm.org.nz	56.3	FS220.67	Seek amendment	C
220	Cook Munro	Jo- Anne	Jo- Anne Cook Munro for Federated Farmers of New Zealand	Jo- Anne Cook Munro for Federated Farmers of New Zealand 444 Anglesea Street Hamilton New Zealand 3240	Federated Farmers of New Zealand	jcookmunro@fedfarm.org.nz	56.8	FS220.69	Seek amendment	S

220	Cook Munro	Jo- Anne	Jo- Anne Cook Munro for Federated Farmers of New Zealand	Jo- Anne Cook Munro for Federated Farmers of New Zealand 444 Anglesea Street Hamilton New Zealand 3240	Federated Farmers of New Zealand	jcookmunro@fedfarm.org.nz	57.21	FS220.78	Seek amendment	C
220	Cook Munro	Jo- Anne	Jo- Anne Cook Munro for Federated Farmers of New Zealand	Jo- Anne Cook Munro for Federated Farmers of New Zealand 444 Anglesea Street Hamilton New Zealand 3240	Federated Farmers of New Zealand	jcookmunro@fedfarm.org.nz	57.25	FS220.79	Seek amendment	C
220	Cook Munro	Jo- Anne	Jo- Anne Cook Munro for Federated Farmers of New Zealand	Jo- Anne Cook Munro for Federated Farmers of New Zealand 444 Anglesea Street Hamilton New Zealand 3240	Federated Farmers of New Zealand	jcookmunro@fedfarm.org.nz	68.32	FS220.95	Seek amendment	C

220	Cook Munro	Jo- Anne	Jo- Anne Cook Munro for Federated Farmers of New Zealand	Jo- Anne Cook Munro for Federated Farmers of New Zealand 3240	Federated Farmers of New Zealand	jcookmunro@fedfarm.org.nz	68.36	FS220.96	Seek amendment	C
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Hilary Samuel Senior Policy Advisor

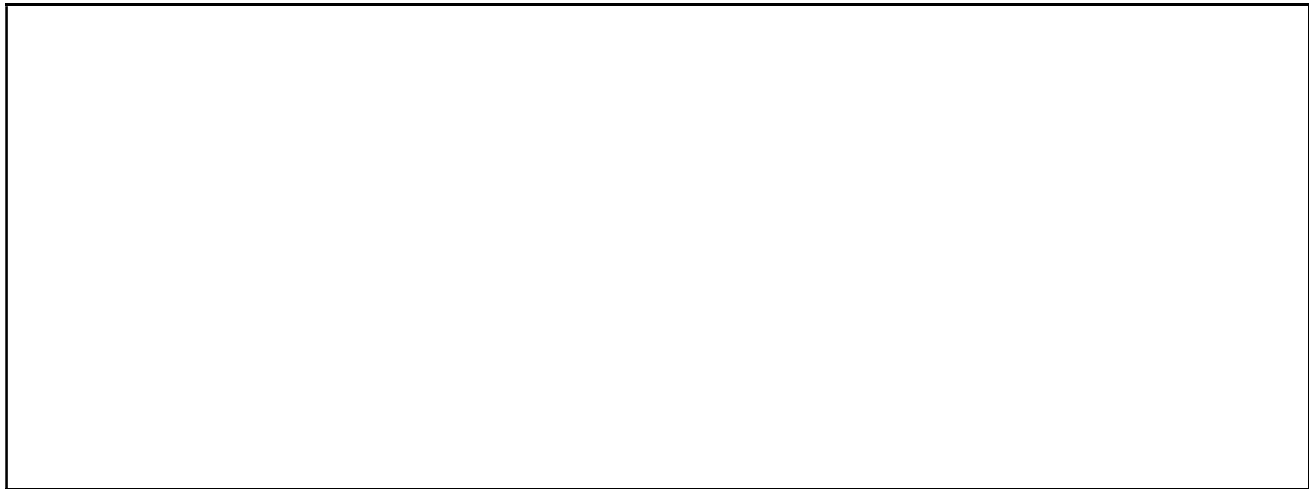
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Organisation:

Transpower New Zealand Limited

First name: Trudi**Last name:** Burney**Postal address:** PO Box 21 Edgeware**Suburb:****City:** Christchurch**Country:** New Zealand**Email:**

environment.policy@transpower.co.nz

Daytime Phone: 03 590 7126

- 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
BM200966 Transpower FS Strategic direction and Rural chapters Lodged 20230403

Taupō District Plan

Proposed Plan Changes 38-43

Further Submission Form RMA Form 6

Office use

This form will be copied. Please do not print outside the frame.

Please remember that Further Submissions must reach Taupō District Council by 4.30pm on Friday 7 April 2023.

Submitter Details:

Full Name : *Transpower New Zealand Limited*

Contact person: *(if applying on behalf of an organisation) Trudi Burney – Senior Environmental Planner*

Address for correspondence: *PO Box 21 Edgeware, Christchurch 8143*

Phone Number: *03 590 7126*

Email Address: *environment.policy@transpower.co.nz*

Further Submitter Relevance: I am: (select one)

(a) [A person representing a relevant aspect of the public interest: or](#)

(b) [A person who has an interest in the proposal that is greater than the interest the general public has.](#)

Explain the grounds for saying that you come within category (a) or (b) above:

Transpower has an interest in the Proposed Plan Change 38 and Proposed Plan Change 42 (“the Proposed Plan Changes”) that is greater than the interest the general public has, for reasons including the following:

- Transpower is the owner and operator of the National Grid and the National Grid is enabled, protected and regulated by the National Policy Statement on Electricity Transmission 2008 (“NPSET”) and the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (“NESETA”). The Proposed Plan Changes must give effect to the NPSET, and must not duplicate or conflict with the regulations in the NESETA. Transpower has an interest in ensuring that the Proposed Plan Changes meets these statutory obligations.*
- Transpower has an interest as a landowner and/or occupier in respect of existing and future National Grid infrastructure that is potentially affected (directly or indirectly) by the relevant submissions.*
- Transpower made an original submission on matters raised or affected by other submissions.*

Public Hearing:

I/we wish to be heard in support of my/our submission:

Yes No

If others make a similar submission, I will consider presenting a joint case with them at a hearing:

Yes No

Due to the specific interests of Transpower, and particularly the national significance of the National Grid, Transpower will not consider presenting a joint case.

Signed: Date: *6 April 2023*

(A signature is not required if you make your submission by electronic means.)

Please return completed forms no later than 4.30pm on Friday 7 April 2023 to:

- “Further Submissions on Plan Changes 38-43”
Taupō District Council
30 Tongariro Street
Private Bag 2005
Taupō 3352 or
- e-mail districtplan@taupo.govt.nz

PLEASE FILL IN YOUR FURTHER SUBMISSION OVERLEAF

Refer attached table

Privacy note: When a person or group makes a submission or further submission on Taupō District Plan Change 38-43 this is public information. Please note that by making a submission your personal details, including your name and addresses will be made publicly available under the Resource Management Act 1991. This is because, under the Act, any further submission supporting or opposing your submission must be forwarded to you as well as to TDC. There are limited circumstances when your submission or your contact details can be kept confidential. If you consider you have reasons why your submission or your contact details should be kept confidential please contact us at districtplan@taupo.govt.nz. Please visit our Privacy Policy page for further information.

Transpower New Zealand Limited: Further submission on submissions made on Proposed Plan Change 38: Strategic Directions and Proposed Plan Change 42: General Rural and Rural Lifestyle Environments, to the Taupo District Plan

The following table sets out the decisions sought by Transpower in respect of submissions made on the Proposed Plan Changes, including the reasons for Transpower's support or opposition in respect of the original submission.

PC No	Submitter name and number	Sub Point No	Plan Provision	Submission Summary	Relief Sought	Stance	Reasons	Decision sought
PC42	Horticulture New Zealand SO26	SO26.12	Amendments to the Definitions of the Taupo District Plan Section 10	The National Policy Statement on Electricity Transmission 2008 (NPSET), a planning document under the Resource Management Act 1991 (RMA), requires Council's to give effect to the NPSET objectives and policies in all plan documents.	<p>Define National Grid Yard as follows: <u>The area located within:</u></p> <p><u>12m in any direction from the visible outer edge of a National Grid tower; or 10m in any direction from a National Grid single pole or pi-pole; or</u></p> <p><u>The area located within 10m either side of the centre line of any overhead 110kV National Grid line on single or pi-pole; or</u></p> <p><u>The area located within 12m either side of the centre line of any overhead National Grid line on towers</u></p>	Oppose	In its original submission Transpower sought a new definition for the National Grid Yard. While largely aligned with that sought by SO26.12, Transpower opposes the reference to "10m in any direction from a National Grid single pole or pi-pole; "on the basis the National Grid Yard setbacks (as sought by Transpower) are based on an engineering approach and give effect to the NPSET. While Transpower does accept a 10m setback from the centreline for poles (noting this is not applicable to Taupo as there are no poles in the district), it seeks a 12m setback from support structures regardless of type. This is for safety reasons and to ensure the National Grid is not compromised and access is maintained	Disallow

							The provisions and setback (as sought by Transpower) are entirely consistent with the district plan approach sought across NZ, including in decisions released on the Proposed Waikato District Plan, and in plans such as Queenstown Lakes, and Dunedin).	
PC42	Horticulture New Zealand SO26	OS26.15	Amendments to the Definitions of the Taupo District Plan Section 10	A definition for reverse sensitivity that should be included in the Plan.	Include a new definition for reverse sensitivity: <u>Means the vulnerability of an existing lawfully established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activity, thereby creating the potential for the Horticulture New Zealand operation of such existing activity to be constrained</u>	Oppose	Transpower opposes the relief sought on the basis the definition makes specific reference to Horticulture NZ. Such reference would have implications for how the term is applied to other activities and is not appropriate.	Disallow
PC42	Horticulture New Zealand SO26	OS26.23	Objective 3b.2.4 Other activities	It is important that visitor accommodation and tourism activities in the rural environment is of a scale and/or managed such that it does not impact on the ability to productive use rural land.	Amend: Maori cultural activities, tourism activities, visitor accommodation and renewable electricity generation and transmission activities are enabled in the General Rural Environment <u>where they do not adversely impact on the productive land use</u>	Oppose	Transpower opposes the relief sought in the basis the generalised nature of the wording does not give effect to the NPS-HPL. For example, Policy 8 NPS-HPL provides for the protection from inappropriate use and development as opposed to protection from all development. This policy intent is articulated through clause 3.9(2)(j) of the NPS-HPL which recognises certain activities which have a functional or operation need to be on the highly productive land.	Disallow
PC42	Horticulture New Zealand SO26	OS26.27	3b.2 Objectives and Policies -	Submitter seeks the addition of a new policy as this is consistent with	Avoid land use that <u>i. is incompatible with the purpose, character and amenity of the general rural environment;</u> <u>ii. does not have a functional need to locate in the</u>	Oppose	While Transpower supports the intent to give effect to the NPS-HPL, it opposes the specific wording on the basis it does not accurately	Disallow

			General Rural Environment	National Policy Statement of Highly Productive Land and avoids incompatible activities from rural environment.	<p><u>general rural environment and is more appropriately located in another zone;</u></p> <p><u>iii. would result in the loss of productive capacity of highly productive land;</u></p> <p><u>iv. would exacerbate natural hazards; and</u></p> <p><u>v. cannot provide appropriate on-site infrastructure.</u></p> <p><u>vi. could result in reverse sensitivity effects</u></p>		<p>reflect clause 3.9(2)(j) of the NPS-HPL. Of specific note, clause ii) of the sought policy refers to functional needs where clause 3.9(2)(j) of the NPS-HPL also refers to 'operational need'.</p> <p>In addition, the conjunctive nature of the wording (with an 'and' at the end of iv) means that the policy could be read such that all the matters i. to v. must be met. The inclusion of vi in this context, is not clear.</p>	
PC42	Horticulture New Zealand SO26	OS26.36	4b.1.7 High voltage transmission lines	There are no provisions for artificial crop protection structures and a setback of 12m from a critical electricity line would compromise horticultural activities.	<p>Amend as follows: Rename to National Grid and delete High Voltage Transmission Lines Delete 4b.1.7 and replace:</p> <p><u>Activity status: Permitted Where: PER-1</u></p> <p><u>No new building(s) or structures, and extensions shall be erected within 12m of any National Grid support structure, except for fences less than 2.5m in height and more than 5m from the support structure.</u></p> <p><u>PER-2</u></p> <p><u>Under the National Grid Conductors (wires) the following can occur: A fence less than 2.5m in height</u></p> <p><u>An extension to existing buildings used for sensitive activities that do not increase the building envelope</u></p> <p><u>Non habitable buildings ancillary to a farming activity, such as milking sheds, piggeries, poultry sheds, greenhouses and protective canopies.</u></p> <p><u>This rule does not apply to: network utilities within a transport corridor or any part of electricity infrastructure that connects the National Grid.</u></p> <p><u>NOTES:</u></p> <p><u>Structures and activities located near transmission lines must comply with the safe distance requirements in the New Zealand Electrical Code of</u></p>	Oppose	<p>In its original submission Transpower seeks a specific National Grid rule that reflects the nationwide approach sought. It is noted the rule sought by Transpower does not include exclusions for artificial crop protection structures as there are no single poles in the district.</p> <p>Transpower opposes the specifics of the rule sought by OS26.36 in so far as it is inconsistent with the relief sought in the Transpower submission. Reliance on NZECP34 is not sufficient to give effect to the NPSET as NZECP34 does not address matters to ensure the operation and maintenance of the National Grid is not compromised.</p> <p>It is also noted the sought rule amends the activity status to permitted, with no corresponding activity statues for those activities not permitted or provided for.</p>	Disallow

					<u>Practice for Electrical Safe Distances (NZECP34:2001). Compliance with this plan does not ensure compliance with NZECP34:2001; Vegetation planted near the National Grid Yard should be selected and/or managed to ensure that it complies with the Electricity (Hazards from Trees) Regulations 2003</u>			
PC42	EnviroWaste Services Ltd OS39	OS39.10	3b.2 Objectives and Policies - General Rural Environment	Some tourism activities and visitor accommodation are not compatible in proximity to the regionally significant landfill. The additional text seeks to qualify the general enabling clause so that unintended consequences do not arise.	Add - Maori cultural activities, tourism activities, visitor accommodation and renewable electricity generation and transmission activities are enabled in the General Rural Environment <u>where compatible with existing and planned character.</u>	Oppose	In its original submission Transpower sought a specific policy for the National Grid. Should this not be accepted, Transpower has concerns the relief sought in OS39.10 will constrain the upgrade or development of electricity transmission activities within the rural zone.	Disallow
PC38	James Ryan OS57	OS57.3	2.4.3 Policy	The New Zealand Energy Strategy 2011 has set a target that 90 percent of electricity generation will be from renewable sources by 2025. Using more renewable resources to meet energy demand will reduce dependence on fossil fuels which are a finite resource and reduce carbon dioxide emissions, which	2.4.3 Policies 1. Land use activities which will result in positive climate change outcomes, including through reducing greenhouse gas emissions and decarbonisation, will be supported and encouraged <u>enabled.</u> 2. <u>Recognise and provide for the use and development of the District's renewable energy resources to facilitate decarbonization of the economy, including a reduction in greenhouse gas emissions, increased electricity generation capacity and improved security of supply including transmission.</u> 3. <u>Enable the upgrading and maintenance of existing and development of new renewable electricity generation activities and transmission, including</u>	Support	Notwithstanding the relief sought by Transpower in its original submission for specific National Grid provisions to give effect to the NPSET, Transpower supports the amendments to Policy 2.4.3. on the basis it provides clear policy recognition for renewable energy and transmission.	Allow

				<p>contribute to global warming and climate change effects. These approaches are also consistent with the National Policy Statement on Renewable Electricity Generation, 2011.</p> <p>Typos / Grammar</p>	<p><u>where contributing to one of the following:</u></p> <ul style="list-style-type: none"> •<u>adaptation required to mitigate risks from climate change</u> •<u>provides for increased electricity output, or greater efficiency continued safe, efficient and secure operation</u> <p>24. Land use activities which will unduly accelerate the effects of climate change will be discouraged.</p> <p>35....</p> <p><u>46. Subdivision, use and development of land must demonstrate resilience to the effects of climate change over time.</u></p>			
PC38	James Ryan OS57	OS57.5	2.5.3 Policy	<p>The introduction should more accurately refer to “electricity generation”, not “energy generation”. One of the laws of physics is that energy cannot be generated. It can only be transformed from one form to another. The NPS Renewable Energy has been in effect since 2011 and with current renewable electricity goals from the government it is no longer enough to simply recognise the role renewable energy but as per the NPS: REG Policy A that Councils should provide for renewable electricity generation.</p>	<p>Amend as follows: 2.5.3 Policies</p> <ol style="list-style-type: none"> 1. Recognise and provide for the national, regional and local benefits of renewable energy <u>electricity</u> generation activities and resources.... 2. Recognise <u>and provide for</u> the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure. 	Support	<p>Notwithstanding the relief sought by Transpower in its original submission for specific National Grid provisions to give effect to the NPSET, Transpower supports the amendments to Policy 2.5.3. on the basis they give effect to the NPSET and NPSREG.</p>	Allow

PC42	James Ryan OS57	OS57. 10	Objective 3b.2.3 Rural industry	Due to its elevated status under the NPS-REG, Manawa has sought (above) that the definition of Rural Industry be amended to delete any reference to electricity generation and that a new definition of Renewable Electricity Generation and Renewable Electricity Generation Activities be including in the Plan. In line with that outcome, a new objective needs to be included in the Plan seeking to enable renewable electricity generation activities (and transmission activities by association).	Insert new objective as follows: <u>Objective 3b.2.X Renewable Electricity Generation and Transmission Activities</u> <u>Enable the development, operation, maintenance and upgrading of renewable electricity generation activities and transmission activities in the General Rural Environment.</u>	Support	Notwithstanding the relief sought by Transpower in its original submission for specific National Grid provisions to give effect to the NPSET, Transpower supports the new objective on the basis it provides a specific objective to give effect to the NPSET and NPSREG.	Allow
PC42	James Ryan OS57	OS57. 14	Policy 3b.2.9 Maintaining the established character	The policy characterises the rural environment by matters such as “limited signage” whereas the existence of more than 20 large-scale renewable electricity generation activities is a far more significant and defining aspect of the General	Amend as follows: Policy 3b.2.9 Maintaining the established Rural character Enable activities in the Maintain the established General Rural Environment <u>that will not compromise the character of the General Rural Environment</u> , as defined by: a) <u>Extensive pastoral farming and forestry</u> b) <u>Structures associated with Renewable Electricity generation Activities</u> c) <u>Geothermal areas and activities, electricity transmission and distribution</u> ad) Large open spaces	Oppose in part	Transpower supports the intent of the policy but has concerns the wording “will not compromise the character” could be applied to electricity transmission activities. It is suggested the wording be clarified to make the intent clearer.	Disallow as relates to wording “will not compro mise the character ”

				Rural Environment in the Taupo District.	between built structures b) A mix of residential and rural industry buildings c) Noises related to production activities during the day but low levels of noise at night d) Low levels of light spill f) Effects from activities including noise, vibration, odour and visual effects e) Infrequent vehicle movements to and from a site fg) Limited signage that directly relates to the activity operating on the site.			
PC42	James Ryan OS57	OS57.28	4b.1.7 High voltage transmission lines	Manawa supports this rule as it seeks to ensure the safe operation of transmission lines. However, the heading of the rule needs to be more accurate. Renewable electricity generation activities are not necessarily network utilities and should also be exempt from this rule	Amend as follows: 4b.1.7 <u>Buildings and Structures in proximity to high voltage transmission lines</u> i. Any building <u>or structure</u> (except network utilities <u>and Renewable Electricity Generation activities</u>) located within 0 – 12 meters of a high voltage transmission line is a restricted discretionary activity.	Oppose	In its original submission Transpower seeks a specific National Grid rule that reflects the nationwide approach and gives effect to the NPSET. For the reasons outlined in its original submission, Transpower opposes the rule in the plan and the relief sought by the submitter. The rule sought in the Transpower submission does provide as a permitted activity within the defined National Grid Yard, buildings or structures “undertaken by a network utility operator, infrastructure, or any part of electricity infrastructure that connects to the National Grid”. Renewable Electricity Generation activities can be substantial structures and their appropriateness in relation to the National Grid requires assessment through the consenting process.	Disallow
PC38	Mercury OS68	OS68.7	2.4.3 Policy	Policies need to be included which specifically provide for	Retain policies 2.4.3(1). Delete policy 2.4.3(3) and policy 2.4.3(4). In addition, add new policies 2.4.3(2) and 2.4.3(3) as below and renumber	Support	Notwithstanding the relief sought by Transpower in its original submission for specific National Grid provisions	Allow

				and enable activities that will help address climate change.	<p>proposed policy 2.4.3.(2) to policy 2.4.3.(4) with a minor amendment as below.</p> <p>1....</p> <p>2. Land use activities which will unduly accelerate the effects of climate change will be discouraged.</p> <p>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.</p> <p><u>2. Recognise and provide for the use and development of the District’s renewable energy resources to facilitate decarbonization of the economy, including a reduction in greenhouse gas emissions, increased electricity generation capacity, improved security of supply and transmission.</u></p> <p><u>3. Enable the upgrading and maintenance of existing and new renewable electricity generation activities and transmission, including where contributing to one of the following:</u></p> <ul style="list-style-type: none"> · <u>adaptation required to mitigate risks from climate change or</u> · <u>provides for increased electricity output, or greater efficiency</u> · <u>continued safe, efficient and secure operation.</u> <p>24. Land use activities which will unduly accelerate the effects of climate change will be discouraged.</p>		to give effect to the NPSET, Transpower supports the relief sought on the basis it provides clear policy recognition for renewable energy and transmission.	
PC38	Mercury OS68	OS68.9	2.5.2 Objectives	Mercury supports all the objectives in 2.5.2 as infrastructure at all levels (locally, regionally and nationally	<p>Retain the following Objectives, subject to minor amendments to Objective 2.5.2(1) and 2.5.2(2) as follows:</p> <p>1. The wider benefits and strategic importance of nationally and regionally significant infrastructure to</p>	Support in part	Notwithstanding the relief sought by Transpower in its original submission for specific National Grid provisions to give effect to the NPET, Transpower supports the relief	Allow

				significant infrastructure) is critical for the effective functioning and social and economic wellbeing of our communities. Minor additions are suggested to strengthen the objectives.	the District and wider, including the economic, cultural and social wellbeing of people and communities and for their health and safety, are recognised <u>and protected</u> in decision making and land use planning. 2. The local and national benefits of the sustainable development, operation, maintenance and upgrading of electricity transmission and renewable electricity generation resources and activities are recognised and encouraged <u>achieved</u> .		sought. However, Transpower does note that it would support the word 'provided for' as opposed to 'encouraged' so as to give effect to the wording within Policy 1 of the NPSET.	
PC38	Mercury OS68	OS68.10	2.5.3 Policy	Mercury supports all the policies in 2.5.3 as infrastructure at all levels (locally, regionally and nationally significant infrastructure) is critical for the effective functioning and social and economic wellbeing of our communities. The policies are appropriate ways of achieving the objectives in 2.5.2. The submitter seeks minor amendments to strengthen/ clarify the policies.	Retain the following policies, subject to minor amendments to Policy 2.5.3(1) and 2.5.3(2) as follows: 2.5.3 Policies 1. Recognise and provide for the national, regional and local benefits of renewable energy <u>electricity</u> generation activities and resources, and transmission activities, in relation to climate change, security of supply, and social, and economic wellbeing of people and communities and for their health and safety. 2. Recognise <u>and provide for</u> the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure.	Support	Notwithstanding the relief sought by Transpower in its original submission for specific National Grid provisions to give effect to the NPSET, Transpower supports the relief sought?.	Allow
PC42	Mercury OS68	OS68.17	Objective 3b.2.3 Rural industry	Due to its elevated status under the NPS-REG, Mercury's earlier submission point (above) seeks that the definition of Rural Industry be amended	Retain Objective 3b.2.3. Insert a new objective following Objective 3b.2.3 as follows: <u>Objective 3b.2.X Renewable Electricity Generation and Transmission Activities</u> <u>Enable the development, operation, maintenance and upgrading of renewable electricity generation</u>	Support in part	In its submission Transpower sought a new objective specific to the National Grid to give effect to the NPSET. Should that relief not be granted, Transpower supports the relief sought in the submission point OS68.17.	Allow in part

				to delete any reference to electricity generation and that a new definition of Renewable Electricity Generation and Renewable Electricity Generation Activities be included in the Plan. Consistent with that request, and for the same reasons, , a new objective needs to be included in the Plan to enable renewable electricity generation activities (and transmission activities by association).	<u>activities and transmission activities in the General Rural Environment.</u>			
PC42	Mercury OS68	OS68.20	Objective 3b.2.6 Impacts on infrastructure	An objective (or policy) that only seeks to “manage” something (with no specified outcome) provides no useful guidance to resource management decision makers or other users of the Taupo District Plan.	Amend Objective 3b.2.6 as follows: Objective 3b.2.6 Impacts on infrastructure The impacts on infrastructure arising from subdivision and development are managed <u>do not compromise the</u> safe and efficient functioning of infrastructure.	Support	Notwithstanding the relief sought by Transpower in its original submission for specific National Grid provisions to give effect to the NPSET, Transpower supports the relief sought on the basis the wording gives effect to NPSET Policy 10.	Allow
PC42	Mercury OS68	OS68.40	4b.1.7 High voltage transmission lines	Mercury supports this rule as it seeks to ensure the safe operation of transmission lines, through the management of risk	Amend as follows: 4b.1.7 <u>Buildings and Structures in proximity to high voltage transmission lines</u> i. Any building <u>or structure</u> (except network utilities <u>and Renewable Electricity Generation activities</u>)	Oppose	In its original submission Transpower seeks a specific National Grid rule that reflects the nationwide approach and gives effect to the NPSET. For the reasons outlined in its original submission, Transpower	Disallow

				associated with structures in close proximity to high voltage infrastructure. Electricity generation is not a network utilities, so needs an exclusion to avoid unnecessary consents.	located within 0 – 12 meters of a high voltage transmission line is a restricted discretionary activity.		opposes the rule in the plan and the relief sought by the submitter. The rule sought in the Transpower submission does provide as a permitted activity within the defined National Grid Yard, buildings or structures “undertaken by a network utility operator, infrastructure, or any part of electricity infrastructure that connects to the National Grid”. Renewable Electricity Generation activities can be substantial structures and their appropriateness in relation to the National Grid requires assessment through the consenting process.	
PC42	Genesis Energy OS84	OS84.37	4b.1.7 High voltage transmission lines	Genesis supports this rule as it seeks to ensure the safe operation of transmission lines. However the heading of the rule needs to be more accurate and the rule needs to provide for renewable electricity generation activities (new definition included, which includes maintenance activities) which, by nature of the activity, are connected to the high-voltage network.	Amend as follows: 4b.1.7 <u>Buildings and Structures in proximity to high voltage transmission lines</u> i. Any building <u>or structure</u> (except network utilities and Renewable Electricity Generation activities) located within 0 – 12 meters of a high voltage transmission line is a restricted discretionary activity.	Oppose	In its original submission Transpower seeks a specific National Grid rule that reflects the nationwide approach and gives effect to the NPSET. For the reasons outlined in its original submission, Transpower opposes the rule in the plan and the relief sought by the submitter. The rule sought in the Transpower submission does provide as a permitted activity within the defined National Grid Yard, buildings or structures “undertaken by a network utility operator. Renewable Electricity Generation activities can be substantial structures and their appropriateness in relation to the National Grid requires assessment through the	Disallow

							consenting process., infrastructure, or any part of electricity infrastructure that connects to the National Grid”.	
PC42	Contact Energy Limited OS93	OS93.52	4b.1.7 High voltage transmission lines	Contact supports this rule as it seeks to ensure the safe operation of transmission lines. However, the heading of the rule needs to be more accurate. In addition to network utilities, this rule should also provide an exception for renewable electricity generation activities (which are not necessarily network utilities).	Amend as follows: 4b.1.7 <u>Buildings and Structures in proximity to high voltage transmission lines</u> i. Any <u>building or structure</u> (except network utilities and <u>Renewable Electricity Generation activities</u>) located within 0 – 12 meters of a high voltage transmission line is a restricted discretionary activity.	Oppose	In its original submission Transpower seeks a specific National Grid rule that reflects the nationwide approach and gives effect to the NPSET. For the reasons outlined in its original submission, Transpower opposes the rule in the plan and the relief sought by the submitter. The rule sought in the Transpower submission does provide as a permitted activity within the defined National Grid Yard, buildings or structures “undertaken by a network utility operator, infrastructure, or any part of electricity infrastructure that connects to the National Grid”. Renewable Electricity Generation activities can be substantial structures and their appropriateness in relation to the National Grid requires assessment through the consenting process.	Disallow
PC42	The Lines Company Limited OS106	OS10 6.19	4b.1.7 High voltage transmission lines	The submitter request to include sub transmission lines which are also high voltage. As currently drafted, transmission lines could be taken to only include Transpower’s transmission lines,	The submitter seeks that the following amendment is made to proposed rule 4b.1.7: Any building (except network utilities) located within 0 – 12 meters of a high voltage transmission <u>or sub transmission</u> 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: a. The location of the structure in relation to high-	Oppose	While Transpower does not oppose provisions specific to sub transmission lines, it has concerns with the extension and application of Rule 4b.1.7 to assets not owned or operated by Transpower. The basis for Rule 4b.1.7 is to give effect to the NPSET, specifically policies 10 and 11. The NPSET is	Disallow

				whereas TLC own and operate a number of regionally significant sub transmission lines (being high voltage 11-33kV). By clarifying that the provision relates to both transmission and sub transmission lines will ensure the rule is appropriately interpreted by plan users and administrators.	voltage transmission line. b. Any effects on the safe and efficient functioning of the transmission line. Alternatively, TLC would accept an advice note (or similar) to the effect that the term “transmission” is inclusive of sub transmission lines that are not a part of the National Grid.		specific to electricity transmission for all parts of the National Grid (which is defined in the NPSET as the assets used or owned by Transpower NZ Ltd). As such Transpower has concerns with the basis for the relief sought in context of the NPSET.	
PC42	The Lines Company Limited OS106	OS10 6.20	4b.3.7 High voltage transmission lines	The submitter seeks for the same reasons provided for Rule 4b.1.7, that Council clarify the rule so as to include sub transmission lines which are also high voltage.	The submitter seeks that the following amendment is made to proposed rule 4b.3.7: i. Any building (except network utilities) located within 0 – 12m of a high-voltage transmission or <u>sub transmission</u> 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: a. The location of the structure in relation to high-voltage transmission line. b. Any effects on the safe and efficient functioning of the transmission line.	Oppose	While Transpower does not oppose provisions specific to sub transmission lines, it has concerns with the extension and application of Rule 4b.3.7 to assets not owned or operated by Transpower. The basis for Rule 4b.3.7 is to give effect to the NPSET, specifically policies 10 and 11. The NPSET is specific to electricity transmission for all parts of the National Grid (which is defined as the assets used or owned by Transpower NZ Ltd). As such Transpower has concerns with the basis for the relief sought in context of the NPSET.	Disallow
PC38	Te Kotahitanga o Ngati Tuwharetoa OS115	OS11 5.10	2.5 Strategic Direction 5 Significant and Local Infrastructure	While infrastructure provides benefits to the social and economic wellbeing of people, communities and the	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	Oppose	While Transpower understands the intent of the relief sought, it submits the matters are addressed within the Tangata Whenua Strategic Direction objectives and policies.	Disallow

				<p>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 Ngati Tuwharetoa hapu and whanau and other iwi within the District, has been profound and the effects of infrastructure development continue to adversely impact on hapu as kaitiaki at place and Maori landowners.</p>	<p>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 Ngati Tuwharetoa hapu and whanau and other iwi within the Taupo District</p> <p>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.</p>			
PC38	Te Kotahitanga o Ngati Tuwharetoa OS115	OS11 5.12	2.5.3 Policy	<p>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 need to be acknowledged.</p>	<p>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.</p>	Oppose	<p>While Transpower understands the intent of the relief sought, it submits the matters are addressed within the Tangata Whenua Strategic Direction objectives and policies.</p>	Disallow
PC38	Federated Farmers of New Zealand – Rotorua / Taupō OS91	OS91. 1	Chapter 2 Strategic Directions	<p>The Taupo district has a significant rural presence and a considerable amount of rural land which is used for primary production.</p>	<p>Page 2, Introduction - Federated Farmers seeks the following relief: (a) the inclusion of a new strategic or significant resource management issue in Chapter 2 Strategic Directions focused on rural sustainability and the protection of the rural economy and environment</p>	Oppose in part	<p>Notwithstanding the merits of including strategic direction specific to primary production (noting it is not a RMA Section 6 matter and has no higher order policy direction) Transpower opposes sought clause 2.</p>	Disallow sought clause 2.

				Federated Farmers seeks the protection of the values, character and resources of the general rural environment as it is defined in Proposed Plan Change 42 (subject to any amendments that have been sought).	within the Taupo district; and (b) the inclusion of the following objectives for the strategic direction rural sustainability or wording with similar intent: 2.X.X Objectives <u>1. The district's general rural environment is managed in a way that promotes rural sustainability while protecting rural land from inappropriate subdivision, land use and development;</u> <u>2. Existing, lawfully established rural land use activities are recognised and protected from incompatible activities.</u> <u>3. The value of the rural economy to the district and the wider region is acknowledged and provided for.</u> <u>(c) the inclusion of appropriate policies which will implement the proposed objectives outlined in (b) above; and</u> <u>(d) any consequential amendments required as a result of the relief sought.</u>		on the basis it fails to recognise other activities within the rural environment and specific to the National Grid, does not give effect to the NPSET.	
PC38	Federated Farmers of New Zealand – Rotorua / Taupō OS91	OS91.6	2.5 Strategic Direction 5 Significant and Local Infrastructure	Federated Farmers supports strategic direction 5 as it is currently drafted including the objectives and policies. However, we seek an amendment to the policies so that it is acknowledged that infrastructure can (and does) have reverse sensitivity effects on existing land use activities such as farming and primary production.	(a) the addition to Policy 2.5.3 of a new clause to read as below or with wording to similar effect; <u>6. To recognise the reverse sensitivity effects infrastructure may have on existing land use activities and to avoid, remedy or mitigate these effects where possible.</u> (b) and any consequential amendments required as a result of the relief sought.	Oppose	Notwithstanding the merits of including strategic direction specific to primary production (noting it is not a RMA Section 6 matter and has no higher order policy direction) Transpower opposes sought clause 6. on the basis it fails to recognise other activities within the rural environment and specific to the National Grid, does not give effect to the NPSET.	Disallow

PC42	Federated Farmers of New Zealand – Rotorua / Taupō OS91	OS91.12	3b.2 Objectives and Policies - General Rural Environment	<p>Federated Farmers has concerns over Objective 3b.2.6 which deals with the impacts on infrastructure from subdivision and development. We recognise that for some essential infrastructure there will be a need to locate in the rural environment. However, the objective also should acknowledge that essential infrastructure can cause reverse sensitivity effects on activities located in the rural environment. Objective 3b.2.4 as currently drafted is inconsistent with Part 2 of the Resource Management Act 1911. It is not appropriate that the objective does not address both sides of the issue or that it seeks to protect all infrastructure from the effects of all subdivision and development.</p>	<p>(a) the amendment of the objectives for chapter 3b Rural Environment so that they clearly state what is to be achieved, where the objective is to be achieved and when the objective will be achieved; and (b) the amendment of objective 3b.2.6 so that it reads as follows or with wording to similar effect: Objective 3b.2.6 Impacts on <u>essential</u> infrastructure The impacts on <u>essential</u> infrastructure arising from <u>inappropriate</u> subdivision, <u>use</u> and development are managed <u>avoided, remedied or mitigated where it is possible to do so.</u> (c) the insertion of a definition for ‘essential infrastructure’ into the district plan; and (d) any consequential amendments required as a result of the relief sought.</p>	Oppose	<p>Transpower opposes the relief sought. In the absence of a suggested definition of ‘essential infrastructure’, Transpower is not clear as to the exact implications of the relief sought. It is noted the term is not defined in the National Planning Standards or in the Regional Policy Statement. Specific to the sought amendments to Objective 3b.2.6, Transpower opposes the reference to ‘where it is possible to do so’ as the wording conveys that avoidance, remediation or mitigation are only required where possible. Specific to the National Grid, such a policy directive does not give effect to the NPSET, specifically policies 10 and 11.</p>	Disallow
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Krystal Foden

From: Hilary Samuel
Sent: Monday, 1 May 2023 9:56 AM
To: District Plan
Subject: FW: Further submission by Transpower NZ to the Taupo District Plan Proposed Plan Changes 38-43

Categories: Krystal

Transpowers confirmation that they are happy with suggestions in body of the email. 😊

Hilary Samuel Senior Policy Advisor

My office hours are school hours Monday, Tuesday, Thursday and Friday.

Taupō District Council • 30 Tongariro Street, Taupō 3330
Private Bag 2005 • Taupō Mail Centre • Taupō 3352 • New Zealand

D +64 7 376 1591 **T** +64 7 376 0899

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www.taupo.govt.nz

From: Environment Policy <Environment.Policy@transpower.co.nz>
Sent: Monday, 1 May 2023 9:43 AM
To: Hilary Samuel <hsamuel@taupo.govt.nz>
Subject: FW: Further submission by Transpower NZ to the Taupo District Plan Proposed Plan Changes 38-43

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

Thank you for the email.

Apologies we did not respond earlier but we were not aware of the earlier email and cannot see it on our system. So we really appreciate the follow up email.

Yes, we can confirm the changes outlined below are acceptable. We appreciate the suggestions.

Please let us know if we need to resubmit the further submission form or if you are happy to amend at your end based on this email.

Thanks again and apologies for not addressing this earlier.

Regards

Pauline

Environmental Policy and Planning Team

Transpower New Zealand Limited

Waikoukou, 22 Boulcott Street, Te Aro, Wellington Central, 6011 or PO Box 1021, Wellington, 6140

M 021 0236 4245

transpower.co.nz

CAUTION: This message and any attachments contain information that is CONFIDENTIAL and may be LEGALLY PRIVILEGED. If you are not the intended recipient any use, disclosure or copying of this email message or attachments is strictly prohibited. If you have received this message in error, please notify the sender immediately and erase all copies of this message and attachments.

From: Hilary Samuel <hsamuel@taupo.govt.nz>

Sent: Friday, 28 April 2023 9:52 am

To: District Plan <districtplan@taupo.govt.nz>; Environment Policy <Environment.Policy@transpower.co.nz>

Subject: RE: Further submission by Transpower NZ to the Taupo District Plan Proposed Plan Changes 38-43

You don't often get email from hsamuel@taupo.govt.nz. [Learn why this is important](#)

Cyber Security Warning: This sender is from outside of the organisation. Please be cautious when opening the links or attachments.

Hi there

Just checking in that you do not want to relodge your non-compliant points please. I have attached suggested amendments below which will make the form compliant. If you can confirm by Monday COP then we can include them, otherwise we will have to disregard them.

Thank you.

Transpower New Zealand Limited	environment.policy@transpower.co.nz	57.14	FS225.10	Oppose	Oppose	57.1 part
Transpower New Zealand Limited	environment.policy@transpower.co.nz	68.9	FS225.13	Seek amendment	Support	Sup
Transpower New Zealand Limited	environment.policy@transpower.co.nz	68.17	FS225.15	Seek amendment	Support	Sup
Transpower New Zealand Limited	environment.policy@transpower.co.nz	91.1	FS225.24	Seek amendment	Oppose	Opp

Hilary Samuel Senior Policy Advisor

My office hours are school hours Monday, Tuesday, Thursday and Friday.

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Private Bag 2005 • Taupō Mail Centre • Taupō 3352 • New Zealand

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From: District Plan

Sent: Monday, 17 April 2023 10:48 AM

To: Environment Policy <Environment.Policy@transpower.co.nz>

Subject: RE: Further submission by Transpower NZ to the Taupo District Plan Proposed Plan Changes 38-43

Kia ora

We have just entered your further submission into the system. Unfortunately some of your points are non-compliant with the RMA. You cannot support or oppose or allow/disallow in part. I believe that you have four points that are currently non-compliant. At this stage they will not be included within the further submission process. However if you reword those four points and relodge by Friday then we can enter them in the process. I have attached the compliant form so you can follow its format.

Thank you.

Hilary Samuel Senior Policy Advisor

My office hours are school hours Monday, Tuesday, Thursday and Friday.

Taupō District Council • 30 Tongariro Street, Taupō 3330
Private Bag 2005 • Taupō Mail Centre • Taupō 3352 • New Zealand

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From: Environment Policy <Environment.Policy@transpower.co.nz>

Sent: Thursday, 6 April 2023 9:51 AM

To: District Plan <districtplan@taupo.govt.nz>

Subject: Further submission by Transpower NZ to the Taupo District Plan Proposed Plan Changes 38-43

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Kia ora

Please find attached a further submission by Transpower New Zealand Limited to the Taupo District Plan Proposed Plan Changes 38-43.

A copy of the further submission will be served on original submitters.

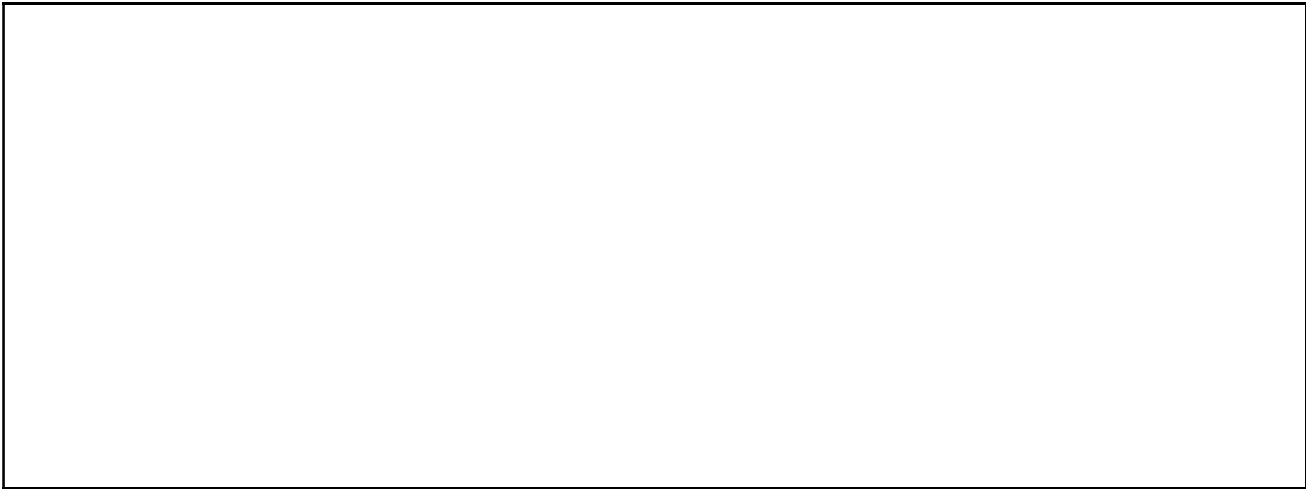
Environmental Policy and Planning Team

Transpower New Zealand Limited

Waikoukou, 22 Boulcott Street, Te Aro, Wellington Central, 6011 or PO Box 1021, Wellington, 6140

transpower.co.nz

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This electronic message together with any attachments is confidential. If you receive it in error: (i) you must not use, disclose, copy or retain it; (ii) please contact the sender immediately by reply email and then delete the emails. Views expressed in this email may not be those of Boffa Miskell Limited. **Electronic Data.** By accepting or using electronic data files provided by Boffa Miskell Limited, you acknowledge and agree that (i) The purpose for which the files were prepared may differ from the purpose that you intend to use the files, and Boffa Miskell makes no representation that the files are suitable for your intended use; (ii) Boffa Miskell gives no representation as to the accuracy, completeness or correctness of the information in the files. You acknowledge that it is your responsibility to confirm all measurements and data in the files; (iii) The provision of the files does not transfer any copyright or other intellectual property rights in the files or any information contained therein. All references to Boffa Miskell shall be removed if any information in the files is copied or altered in any way; and (iv) To the full extent permitted by law, Boffa Miskell accepts and shall have no liability whatsoever (including in negligence) for any loss, damage or liability arising from the receipt or use of the files. This e-mail message has been scanned for Viruses and Content.

Organisation:

Heritage New Zealand Pouhere Taonga

First name: Carolyn**Last name:** McAlley**Postal address:** PO Box 13339, Tauranga Central**Suburb:****City:** Tauranga**Country:** New Zealand**Postcode:** 3141**Email:** CMcAlley@heritage.org.nz**Daytime Phone:** 07 5774530

- 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 are making a similar submission, HNZPT would consider presenting a joint case with them at the hearing.

Attached Documents

File
HNZPT Further submission table to TDC PDP
HNZPT Further submission to the Summary of Submissions for PC 38 and 42

Appendix A				
Further Submission of Heritage New Zealand Pouhere Taonga to Taupo District Council Proposed Plan, Plan changes 38 and 42.				
<u>Underline</u> = include and Strikethrough = delete				
HNZPT= Heritage New Zealand Pouhere Taonga				
TDC = Taupo District Council				
Plan Change 38=PC38				
Plan Change 42=PC42				
TDC PC provision number	Submitter name, number, point number & content	NZHPT support or oppose	Reasons	Relief sought by the HNZPT
Plan Change 38 - Strategic Directions Chapter				
Objective 2.3.2	John Lenihan for Rangatira Block Trusts Submission point Number OS41.7. The submitter seeks the deletion of Objective 2.3.2	Oppose	In their primary submission HNZPT sought an amendment to this objective, Urban form and development, for the improved consideration of cultural and historic heritage values. Therefore, HNZPT cannot support the deletion of this objective.	That the submission point be rejected.
Objective 2.3.2	Curcio Lamas for Ryman Healthcare Limited Submission point number OS59.3. The submitter seeks various amendments to this Objective	Oppose	In their primary submission HNZPT sought an amendment to this objective, Urban form and development, for the improved consideration of cultural and historic heritage values. The submitter has not detailed the full extent of amendments sought therefore, HNZPT cannot support the amendments.	That the submission point be rejected
Direction 3 Policy 2.3.3.12	Ashiley Sycamore for DOC Submission point number OS89.7 The submitter seeks the following amendment to the policy; 12. Do not support <u>Avoid</u> subdivision and development which will inappropriately affect heritage sites or areas of important natural and landscape values.	Support in part	HNZPT also submitted to the same policy seeking clarification of the term heritage sites as this does not appear to be used in the plan and / or is a defined term. HNZPT is supportive of strong wording in policies to discourage inappropriate subdivision and development.	That the submission point is accepted.

Policy 2.5.3	<p>Duncan Whyte for Tauhara Quarries Ltd Submission point OS75.3</p> <p>The submitter seeks to amend the policy as follows; Subdivision, land use and development will not adversely affect (including reverse sensitivity effects) the effective and safe functioning of infrastructure, <u>including those activities which support them such as quarrying</u></p>	Oppose	HNZPT sought changes to another policy in this suite of policies and is concerned that this proposed amendment introduces a new matter to the suite of policies that could have adverse effects on cultural and historic heritage.	That the submission point be rejected.
Plan Change 42 General Rural and Rural Lifestyle Environments				
New Definition: Conservation	<p>New Zealand Agricultural Aviation Association & Submission point number OS23.3</p> <p>The submitter, NZAAA, seeks the inclusion of a definition for Conservation: <i>Conservation activity means the use of land for activities undertaken for the purposes of maintaining, protecting and/or enhancing the natural, historic and/or ecological values of a natural or historic resource. It may include activities which assist to enhance the public's appreciation and recreational enjoyment of the resource and includes Planting; pest and weed control including the use of agricultural aviation; plant and tree nurseries; and track construction; biosecurity</i></p>	Oppose	Without the benefit of being able to view future sections of the Proposed District Plan, such as the Historic Heritage section, HNZPT is concerned at the broad nature of the proposed definition, in particular the references to the conservation of historic values. The conservation of historic heritage is guided by a number of well-known terms, including those already in the District Plan, and documents such as the ICOMOS Charter	That the submission point be rejected or amended with the removal of references to historic values and historic resource.

<p>4b.5.2 New rule for Subdivision - Rural Lifestyle Environment that adjoins the General Rural Environment</p>	<p>Burke Carlton for CH GP Ltd Trust & Submission point number OS53.7</p> <p>Sally Carlton for BACS Group Trust Submission point number OS54.7</p> <p>Lars Carlton for Sunny Ridge farm GP Limited Submission point number OS80.7</p> <p>Timothy Carlton Submission point number OS81.7</p> <p>Bryce David McGrath Submission point number OS116.7</p> <p>Geoff Carlton Submission point number OS82.7</p> <p>The submitters seek that 4b.5.2 is amended to include a new restricted discretionary activity subdivision rule and associated assessment criteria and amend the associated discretionary activity.</p>	<p>Oppose in part</p>	<p>The submitter seeks a new restricted discretionary activity subdivision rule and assessment criteria to allow lots smaller than that proposed at notification. The submitter has suggested that the assessment criteria include the following; <i>“e. Any actual or potential effects on areas or features of cultural, historic, landscape or natural value as identified in the plan”.</i></p> <p>HNZPT is supportive of the proposed assessment criteria given that the same cultural and historic heritage assessment criteria is part of other subdivision rules, which HNZPT has supported. However, HNZPT does have some concerns that dependant on location, smaller lots could have adverse impacts on cultural landscapes and other historic heritage values and consideration should be give as to how this would be managed at the item of subdivision, in a manner that provides protection for these important matters.</p>	<p>That the submission point be rejected.</p>
<p>4b.5.8 Subdivision - Bonus Lots</p>	<p>Horticulture New Zealand & Submission Point Number OS26.58</p> <p>The submitter seeks the deletion of the bonus lot subdivision rule</p>	<p>Oppose</p>	<p>HNZPT seeks the retention of the bonus lot subdivision rule as in appropriate circumstances these provisions can result in beneficial heritage outcomes as sought by Heritage New Zealand in their original submission.</p>	<p>That the submission point is rejected.</p>
<p>4b.5.8 Subdivision - Bonus Lots</p>	<p>Federated Farmers of New Zealand – Rotorua / Taupō & Submission point number OS91.21</p> <p>The submitter seeks an addition to the Subdivision-Bonus Lot rules</p>	<p>Support in part</p>	<p>HNZPT supports the intent of the submission point to include other matters as part of bonus lot provisions as HNZPT have also sought a similar extension of the applicability of this provision in their original submission.</p>	<p>That the submission point is accepted.</p>



HERITAGE NEW ZEALAND
POUHERE TAONGA

30/03/2023

District Plan Changes 38-43,
Taupō District Council,
Private Bag 2005,
Taupō Mail Centre, 3352.
ATTN: Gareth Green - Chief Executive Officer

File ref:LAO54

Dear Gareth,

1. This is a further submission of Heritage New Zealand Pouhere (HNZPT) to the proposed Taupō District Council summary of submissions for proposed plan changes 38-43.
2. This is a further submission in support and opposition to submission points contained in the Taupō District Council summary of submissions for proposed Plan Changes 38-43.
3. HNZPT has an interest in the proposal that is greater than the interest the general public:

HNZPT is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage. HNZPT is New Zealand's lead agency for heritage protection.

4. The submissions that HNZPT supports and opposes are detailed in Attachment A to this submission.
5. The reasons for HNZPT's further submissions are detailed in Attachment A to this submission.
6. HNZPT seeks the decisions as described in Attachment A to this submission:
7. HNZPT wishes to be heard in support of its further submission.
8. If others are making a similar submission, HNZPT would consider presenting a joint case with them at the hearing.

Yours sincerely

P.P. BTP

Sherry Reynolds
Director - Northern Region

Address for service:

Heritage New Zealand Pouhere Taonga
Lower Northern Office
P O Box 13339
Tauranga 3141
Telephone: 07 577 4530
email: cmcalley@heritage.org.nz
Contact person: Carolyn McAlley

Attachments:

Appendix A-Further submission point table

Appendix A

Further Submission of Heritage New Zealand Pouhere Taonga to Taupo District Council Proposed Plan, Plan changes 38 and 42.

Underline = include and Strikethrough = delete

HNZPT = Heritage New Zealand Pouhere Taonga

TDC = Taupo District Council

Plan Change 38=PC38

Plan Change 42=PC42

TDC PC provision number	Submitter name, number, point number & content	NZHPT support or oppose	Reasons	Relief sought by the HNZPT
Plan Change 38 - Strategic Directions Chapter				
Objective 2.3.2	John Lenihan for Rangatira Block Trusts Submission point Number OS41.7.	Oppose	In their primary submission HNZPT sought an amendment to this objective, Urban form and development, for the improved consideration of cultural and historic heritage values. Therefore, HNZPT cannot support the deletion of this objective.	That the submission point be rejected.
Objective 2.3.2	Curcio Lamas for Ryman Healthcare Limited Submission point number OS59.3.	Oppose	In their primary submission HNZPT sought an amendment to this objective, Urban form and development, for the improved consideration of cultural and historic heritage values. The submitter has not detailed the full extent of amendments sought therefore, HNZPT cannot support the amendments.	That the submission point be rejected
Direction 3 Policy 2.3.3.12	Ashley Sycamore for DOC Submission point number OS89.7	Support in part	HNZPT also submitted to the same policy seeking clarification of the term heritage sites as this does not appear to be used in the plan and / or is a defined term. HNZPT is supportive of strong wording in policies to discourage inappropriate subdivision and development.	That the submission point is accepted.
The submitter seeks the following amendment to the policy; 12. Do not support Avoid subdivision and development which will inappropriately affect heritage sites or areas of important natural and landscape values.				

Policy 2.5.3	Duncan Whyte for Tauhara Quarries Ltd Submission point OS75.3 The submitter seeks to amend the policy as follows; Subdivision, land use and development will not adversely affect (including reverse sensitivity effects) the effective and safe functioning of infrastructure, including those activities which support them such as quarrying	Oppose	HNZPT sought changes to another policy in this suite of policies and is concerned that this proposed amendment introduces a new matter to the suite of policies that could have adverse effects on cultural and historic heritage.	That the submission point be rejected.
Plan Change 42 General Rural and Rural Lifestyle Environments				
New Definition: Conservation	New Zealand Agricultural Aviation Association & Submission point number OS23.3 The submitter, NZAAA, seeks the inclusion of a definition for Conservation: <i>Conservation activity means the use of land for activities undertaken for the purposes of maintaining, protecting and/or enhancing the natural, historic and/or ecological values of a natural or historic resource. It may include activities which assist to enhance the public's appreciation and recreational enjoyment of the resource and includes Planting; pest and weed control including the use of agricultural aviation; plant and tree nurseries; and track construction; biosecurity</i>	Oppose	Without the benefit of being able to view future sections of the Proposed District Plan, such as the Historic Heritage section, HNZPT is concerned at the broad nature of the proposed definition, in particular the references to the conservation of historic values. The conservation of historic heritage is guided by a number of well-known terms, including those already in the District Plan, and documents such as the ICOMOS Charter	That the submission point be rejected or amended with the removal of references to historic values and historic resource.

<p>4b.5.2 New rule for Subdivision - Rural Lifestyle Environment that adjoins the General Rural Environment</p>	<p>Burke Carlton for CH GP Ltd Trust & Submission point number OSS3.7 Sally Carlton for BACS Group Trust Submission point number OSS4.7 Lars Carlton for Sunny Ridge farm GP Limited Submission point number OS80.7 Timothy Carlton Submission point number OS81.7 Bryce David McGrath Submission point number OS116.7 Geoff Carlton Submission point number OS82.7</p>	<p>Oppose in part</p>	<p>The submitter seeks a new restricted discretionary activity subdivision rule and assessment criteria to allow lots smaller than that proposed at notification. The submitter has suggested that the assessment criteria include the following: <i>"e. Any actual or potential effects on areas or features of cultural, historic, landscape or natural value as identified in the plan".</i> HNZPT is supportive of the proposed assessment criteria given that the same cultural and historic heritage assessment criteria is part of other subdivision rules, which HNZPT has supported. However, HNZPT does have some concerns that dependant on location, smaller lots could have adverse impacts on cultural landscapes and other historic heritage values and consideration should be give as to how this would be managed at the item of subdivision, in a manner that provides protection for these important matters.</p>	<p>That the submission point be rejected.</p>
<p>4b.5.8 Subdivision - Bonus Lots</p>	<p>Horticulture New Zealand & Submission Point Number OS26.58 The submitter seeks the deletion of the bonus lot subdivision rule</p>	<p>Oppose</p>	<p>HNZPT seeks the retention of the bonus lot subdivision rule as in appropriate circumstances these provisions can result in beneficial heritage outcomes as sought by Heritage New Zealand in their original submission.</p>	<p>That the submission point is rejected.</p>
<p>4b.5.8 Subdivision - Bonus Lots</p>	<p>Federated Farmers of New Zealand – Rotorua / Taupō & Submission point number OS91.21 The submitter seeks an addition to the Subdivision-Bonus Lot rules</p>	<p>Support in part</p>	<p>HNZPT supports the intent of the submission point to include other matters as part of bonus lot provisions as HNZPT have also sought a similar extension of the applicability of this provision in their original submission.</p>	<p>That the submission point is accepted.</p>



First name: Mark

Last name: Crisp

On behalf of:
Contact Energy Limited

Postal address: C/- Mitchel Daysh Limited

Suburb:

City: Hamilton

Country: New Zealand

Email: mark.chrisp@mitchelldaysh.co.nz

Daytime Phone: 027 4758383

- 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 further submission, Contact would consider presenting a joint case with them at any hearing.

Attached Documents

File

PDF - FS Contact Energy



Contact Energy Limited
Further Submissions on Plan Change 38
to the Taupō District Plan
Strategic Directions

Date: 6 April 2023

To: Taupō District Council

Submitter: Contact Energy Limited

Submitter No.: 93

Address for service: C/- Mitchel Daysh Limited
PO Box 1307
HAMILTON 3240
Attention: Mark Chrisp

Contact details: **E** mark.chrisp@mitchelldaysh.co.nz
M +64 27 475 8383

- In accordance with clause 8(1) of the First Schedule of the Resource Management Act Contact Energy Limited represents a relevant aspect of the public interest.
- Contact Energy Ltd (Contact) wishes to be heard in support of this further submission.
- If others make a similar further submission, Contact would consider presenting a joint case with them at any hearing.

Contact Energy Limited by its duly authorised agent:

Mitchell Daysh Limited

Mark Chrisp

Further Submissions to TDC on behalf of Contact Energy Limited

Plan Change 38 (Strategic Directions)

Submission Point	Name of Submitter	Support or Oppose	Reason	Decision Sought from Council
Individual Submitters				
OS3.2	Jen Shieff Turangi Riverside Area Preservation Group	Support in part	The submitter seeks to retain Strategic Direction 2.3.3 point 10. Contact Energy sought amendments to Policy 2.3.3.10 in their original submission.	Accept the relief sought by the submitter insofar as it is consistent with the original submission by Contact Energy.
OS3.4	Jen Shieff Turangi Riverside Area Preservation Group	Support in part	The submitter seeks to retain Strategic Direction 2.6.2. Objectives Contact Energy sought amendments to the 2.6.2 Objectives in their original submission.	Accept the relief sought by the submitter insofar as it is consistent with the original submission by Contact Energy.
OS3.5	Jen Shieff Turangi Riverside Area Preservation Group	Oppose	The submitter seeks to amend the policies in Strategic Direction 2.3.3.8, to make reference to all town centres in the district. Contact Energy sought to retain 2.3.3.8 as notified in their original submission.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS9.1	Lucy Edwards NZ Defence Force	Oppose in part	The submitter seeks to retain the objectives 2.5.2 as notified. Contact Energy sought to amend Objectives 2.5.2.1 and 2.5.2.2 in their original submission.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.

OS9.2	Lucy Edwards NZ Defence Force	Oppose in part	The submitter seeks to retain the policy 2.5.3 as notified. Contact Energy sought to amend Policies 2.5.3.1 and 2.5.3.2 in their original submission.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS17.3	Jennifer Molloy- Hargreaves	Oppose	The submitter is fully supportive of Plan Change 38. Contact Energy sought several amendments to Plan Change 38 in their original submission.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS41.11	John Lenihan Rangitira Block Trusts	Oppose	The submitter is seeking to delete Policy 2.3.3. They regard it as a poorly drafted policy. Contact Energy sought several amendments to Policy 2.3.3 in their original submission. The deletion of Policy 2.3.3 is therefore inconsistent with the relief sought by Contact Energy.	Reject the relief sought by the submitter.
OS91.5	Colin Guyton Federated Farmers of NZ	Oppose	The submitter is seeking amendments to 2.4 Strategic Direction 4 Climate Change – Policy 2. The amendments sought are not entirely consistent with the amendments proposed in the original Contact Energy submission.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.

OS91.6	Colin Guyton Federated Farmers of NZ	Oppose	<p>The submitter is seeking amendment to 2.5 Strategic Direction 5 Significant and Local Infrastructure.</p> <p>Federated Farmers supports strategic direction 5 as it is currently drafted including the objectives and policies. However, they seek an amendment to the policies so that it is acknowledged that infrastructure can (and does) have reverse sensitivity effects on existing land use activities such as farming and primary production.</p> <p>Federated Farmers are seeking an addition to Policy 2.5.3 of a new clause to read as below or with wording to similar effect;</p> <p><u>6. To recognise the reverse sensitivity effects infrastructure may have on existing land use activities and to avoid, remedy or mitigate these effects where possible.</u></p> <p>and</p> <p>any consequential amendments required as a result of the relief sought.</p>	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS62.2	Alana Delich Singers Ecological	Oppose	<p>The submitter is seeking amendments to provide for an indigenous buffer between geothermal ecosystems and industrial development. The submission relates to the proposed Industrial rezoning at Broadlands Road (and therefore appears to be a submission to <u>Plan Change 43 not Plan Change 38</u>).</p> <p>The principle of creating a buffer on industrial zoned land (and potentially rendering areas of industrial land unsuitable for development) is opposed; particularly in the absence of appropriate information and detail to understand the location and scale of the proposed buffer</p>	Reject the relief sought by the submitter

OS62.6	Alana Delich Singers Ecological	Oppose	<p>The submitter is seeking amendments to Policy 2.2.3 to provide a buffer between industrial activity and indigenous areas. The submission relates to the proposed Industrial rezoning at Broadlands Road (and is therefore a submission to Plan Change 43 <i>not Plan Change 38</i>).</p> <p>The principle of creating a buffer on industrial zoned land (and potentially rendering areas of industrial land unsuitable for development) is opposed, particularly in the absence of appropriate information and detail to understand the location and scale of the proposed buffer</p>	Reject the relief sought by the submitter.
OS114.6	Alana Delich Taupō Climate Action Group	Support in part	<p>The submitter is seeking amendments to 2.6 Strategic Direction 6 Natural Environment Values to include 'specific recognition of significant geothermal features in the preamble to the strategic direction'.</p> <p>The addition of reference to significant geothermal features in the preamble is supported insofar as it acknowledges the significant geothermal features located within the District, and the outcome is consistent with the Waikato Regional Plan and the original submission by Contact Energy.</p>	Accept the relief sought by the submitter only insofar as the outcome is consistent with the Waikato Regional Plan and the original submission by Contact Energy.
OS114.7	Alana Delich Taupō Climate Action Group	Oppose	<p>The submitter is seeking the addition of a new objective to recognise the significant geothermal features within the district within the Natural Environment Values. The following new objective is proposed: <i>"The protection of significant geothermal features from inappropriate land use and development which may adversely affect these unique ecosystems."</i></p>	Reject the relief sought by the submitter insofar as the outcome is inconsistent with the Regional Policy Statement and Waikato Regional Plan management regime relating to Significant Geothermal Features; and the original submission by Contact Energy.

OS114.18	Alana Delich Taupō Climate Action Group	Support in part	<p>The submitter is seeking amendments to the wording in the climate change strategic direction to 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.</p> <p>Amendments to support a reduction in greenhouse gas emissions are supported insofar as any amendments recognise the significance of renewable electricity generation within the District, and is consistent with the original submission by Contact Energy.</p>	Accept the relief sought insofar as it recognises the role of renewable electricity generation within the District and is consistent with the original submission by Contact Energy.
OS110.3	Trudi Burney Transpower NZ Ltd	Support in part	<p>The submitter is seeking amendments to the 2.5 Strategic Directions 5 Significant and Local Infrastructure including the addition of definitions for 'nationally significant; and 'regionally significant' infrastructure. The addition of definitions is supported by Contact Energy.</p>	Accept the relief sought by the submitter insofar as definitions for 'nationally significant' and regional significant' infrastructure are included within the District Plan, provided these definitions include the existing power station sites, associated infrastructure and ancillary activities.
OS110.6	Trudi Burney Transpower NZ Ltd	Support in part	<p>The submitter is seeking amendments to the District Plan to include definitions for 'nationally significant' and regional significant' infrastructure as referred to in 2.5.3 Strategic Directions Policy 2.</p>	Accept the relief sought by the submitter. Add appropriate definitions for 'nationally significant' and regional significant' infrastructure provided these definitions include the existing power station sites, associated infrastructure and ancillary activities.

OS110.7	Trudi Burney Transpower NZ Ltd	Oppose	<p>The submitter is seeking to amend Strategic Directions 2.5.3 Policy 3 to delete the reference to reverse sensitivity effects.</p> <p>The original submission by Contact Energy sought to retain the existing wording in Policy 3.</p>	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS112.1	Annabelle Lee Chapman Tripp Radio NZ Ltd	Support	<p>The submitter is seeking amendments to the 2.5 Strategic Directions 5 Significant and Local Infrastructure; including the addition of definitions for 'nationally significant' and regional significant' infrastructure.</p> <p>The addition of appropriate definitions is supported by Contact Energy.</p>	Accept the relief sought by the submitter. Add appropriate definitions for 'nationally significant' and regional significant' infrastructure provided these definitions include the existing power station sites, associated infrastructure and ancillary activities.
OS59.9	Andrea Curcio Lamas Ryman Healthcare Ltd	Support in part	<p>The submitter is seeking amendments to the Strategic Directions in 2.3.3 Policy 10. The amendments proposed are potentially inconsistent with the relief sought in the original submission by Contact Energy (which also sought amendments to the wording of Policy 10).</p> <p>The amendments sought are supported insofar as they are consistent with the relief sought in the original submission by Contact Energy.</p>	Accept the relief sought by the submitter insofar as it is consistent with the original submission by Contact Energy.

OS98.9	Andrea Curcio Lamas Retirement Village Association of NZ Inc	Support in part	The submitter is seeking amendments to the Strategic Directions in 2.3.3 Policy 10. The amendments proposed are potentially inconsistent with the relief sought in the original submission by Contact Energy (which also sought amendments to the wording of Policy 10). The amendments sought are supported insofar as they are consistent with the relief sought in the original submission by Contact Energy.	Accept the relief sought by the submitter insofar as it is consistent with the original submission by Contact Energy.
OS46.9	Chris Marshall Tukairangi Trust	Oppose	The submitter is seeking amendments to Policy 2.4.3 relating to avoiding subdivision and land use adjacent to natural areas. Contact Energy have also sought amendments to Policy 2.4.3. The submission is therefore opposed insofar as it is inconsistent with the relief sought in the original submission by Contact Energy.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS115.11	George Asher Te Kotahitanga o Ngati Tuwharetoa	Support in part	The submitter is seeking amendments to Strategic Directions 2.5.2 Objectives. The amendments proposed are supported insofar as they are consistent with the relief sought in the original submission by Contact Energy.	Accept the relief sought by the submitter insofar as it is consistent with the original submission by Contact Energy.
OS115.33	George Asher Te Kotahitanga o Ngati Tuwharetoa	Support in part	The submitter is seeking amendments to Strategic Directions 2.5.3 Policy 1. The amendments proposed are supported insofar as they are consistent with the relief sought in the original submission by Contact Energy.	Accept the relief sought by the submitter insofar as it is consistent with the original submission by Contact Energy.

OS115.34	George Asher Te Kotahitanga o Ngati Tuharetoa	Oppose	The submitter is seeking amendments to Strategic Directions 2.5.3 to delete Policies 3 and 4, and replace with a new policy. The amendments proposed are opposed insofar as they are inconsistent with the relief sought in the original submission by Contact Energy.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
Submitter No. 89 Department of Conservation				
OS89.1	Ashley Sycamore Department of Conservation	Oppose	The submitter is seeking amendments to Plan Change 38 to give effect to the national direction under the DNPS-IB. The submitter seeks that the Strategic Directions chapter be updated to give effect to the NPS-IB where required. This is beyond the scope of the Plan Change.	Reject the relief sought by the submitter.
OS89.2	Ashley Sycamore Department of Conservation	Oppose	The submitter is seeking amendments to Plan Change 38 to include an objective and/or policy in relation to biodiversity offsetting and biodiversity compensation to have better regard to section 6(c) of the RMA. This is beyond the scope of the Plan Change.	Reject the relief sought by the submitter.
OS89.5	Ashley Sycamore Department of Conservation	Oppose	The submitter is seeking amendments to Objective 2.3.2.7	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS89.6	Ashley Sycamore Department of Conservation	Oppose	The submitter is seeking to retain 2.3.3 Policy 7 as notified, unless iwi/hapu/whanau request specific changes. Contact Energy have also sought changes to this Policy in the original submission	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.

OS89.7	Ashley Sycamore Department of Conservation	Oppose	The submitter is seeking to amend 2.3.3. Policy 12 to replace 'do not support' with avoid. The use of 'avoid' is opposed by Contact Energy.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS89.11	Ashley Sycamore Department of Conservation	Oppose	The submitter is seeking to retain 2.6.2 Objective 4 as notified, unless iwi/hapu/whanau request specific changes. Contact Energy have also sought changes to this Policy in the original submission	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS89.15	Ashley Sycamore Department of Conservation	Oppose	The submitter is seeking to amend 2.6.3 Policy 1 to allow for consideration of adverse effects that could occur on SNAs from 'subdivision'. Contact Energy has also sought changes to this Policy in the original submission.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
Submitter No.22 NZ Pork Industry Board				
OS22.20	Hannah Ritchie NZ Pork Industry Board	Support in part	The submitter is seeking amendments to Objective 2.4.2 to relate back to land use activities that produce greenhouse gas emissions. Contact Energy also sought amendments to this objective in their original submission.	Accept the relief sought by the submitter insofar as any amendments are consistent with the relief sought in the original submission by Contact Energy.
OS22.21	Hannah Ritchie NZ Pork Industry Board	Oppose in part	The submitter is seeking to retain 2.4 Strategic Direction 4 Climate Change. Contact Energy have sought a number of amendments to 2.4. Strategic Direction 4 Climate Change in their original submission.	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.

OS22.22	Hannah Ritchie NZ Pork Industry Board	Oppose	<p>The submitter is seeking to amend Policy 2.4.3 Strategic Direction to include a new strategic direction, objectives and policies to outline the key strategic and significant resource management issues for the rural environments within the district.</p> <p>The amendments seek to manage reverse sensitivity effects with respect to primary production activities. The proposed wording does not consider the effects on other lawfully established activities (including Geothermal Power Stations, Taupō Motorsport Park and Taupō Racing Club) that are also located within the Rural Environment.</p> <p>Contact Energy also sought amendments to the Policies in 2.4.3 in their original submission.</p>	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
OS22.23	Hannah Ritchie NZ Pork Industry Board	Oppose	<p>The submitter is seeking to amend Chapter 2 Strategic Directions to include a new strategic direction, objectives and policies to outline key strategic and significant resource management issues for the rural environments within the district.</p> <p>The proposed amendments do not recognise other lawfully established activities (including Geothermal Power Stations, Taupō Motorsport Park and Taupō Racing Club) that are also located within the Rural Environment.</p>	Reject the relief sought by the submitter insofar as it is inconsistent with the original submission by Contact Energy.
Submitter No. 26 Horticulture NZ				
OS26.59	Sarah Cameron Horticulture NZ	Support in part	The submitter is seeking to amend Chapter 2 Strategic Directions to include a new strategic direction for the Rural Environment.	Accept the relief sought by the submitter insofar as it is consistent with the original submission by Contact Energy.

Submitter No. 29 Waikato Regional Council				
OS29.3	Joao Paulo Silva Waikato Regional Council	Oppose	<p>The submitter is seeking to amend Objective 2.3.2.1. to include a new bullet point that reads: <i>'Ensures the protection of Significant Geothermal Features including geothermal vegetation.'</i></p> <p>The addition of a new bullet point (and reference to 'protection') is opposed by Contact Energy on the basis that it is inconsistent with the policy regime in the Regional Policy Statement and Waikato Regional Plan.</p>	<p>Reject the relief sought by the submitter. Refer to the original submission by Contact Energy.</p>
OS29.4	Joao Paulo Silva Waikato Regional Council	Oppose	<p>The submitter is seeking to amend Objective 2.3.2.1. to include a new bullet point that reads: <i>'Ensure that building, roading and infrastructure developments are directed away from geothermal hazards.'</i></p> <p>The amendments sought are too vague and are therefore opposed. It is not clear what is meant by 'directed away from geothermal hazards'.</p>	<p>Reject the relief sought by the submitter. Refer to the original submission by Contact Energy.</p>
OS29.8	Joao Paulo Silva Waikato Regional Council	Oppose	<p>The submitter is seeking to add a new policy to 2.3.3 as follows: <i>'Avoid new development and subdivision of areas in close proximity to Significant Geothermal Features as mapped in the Waikato Regional Plan'</i>.</p> <p>The amendments sought are too vague and are therefore opposed. It is not clear what is meant by 'in close proximity to Significant Geothermal Features'. The use of 'avoid' is also opposed. 'Development' would include renewable electricity generation activities.</p>	<p>Reject the relief sought by the submitter. Refer to the original submission by Contact Energy.</p>

OS29.10	Joao Paulo Silva Waikato Regional Council	Support in part	<p>The submitter is seeking to amend Strategic Directions 2.5.2 Significant and Local Infrastructure to recognise the importance of the district's electricity generating capacity to the local and national economy.</p> <p>The amendments proposed (changing the percentage from 20% to 27% and providing wording that recognises the local and national importance of Taupō's electricity-producing capability) are supported.</p>	Accept the relief sought by the submitter insofar as it is consistent with the original submission by Contact Energy.
OS29.11	Joao Paulo Silva Waikato Regional Council	Oppose in part	<p>The submitter is seeking to amend Strategic Directions 2.6.6 Natural Environment Values as follows:</p> <p>To include the following sentence:</p> <p><u>Our rare habitats include 42% of the nation's geothermal vegetation, a rare and vulnerable ecosystem type.</u></p> <p><u>And</u></p> <p><u>include a new policy in 2.6.3. to read:</u></p> <p><u>Map as SNAs all geothermal areas that meet the Waikato Regional Policy Statement definition of SNA, and ensure their protection.</u></p> <p>The proposal to recognise geothermal vegetation (as required under the NPS) is supported. However the requirement to 'and ensure their protection' is opposed by Contact Energy on the basis that it is inconsistent with the policy regime in the RPS and WRP.</p>	Reject the relief sought insofar as it is inconsistent with the original submission by Contact Energy.

Submitter No. 48 Pukawa D2 Trust				
OS58.1	Joan Forret Pukawa D2 Trust	Oppose	<p>The submitter is seeking amendments to the Strategic Directions.</p> <p><i>“To assist with the importance and status of each direction, a hierarchy should be established... to ensure Tangata Whenua – Direction 1 is regarded on all decision making processes to take into account the principles of te Tiriti of Waitangi... <u>The order of the Strategic Directions reflects the status and importance of each Direction and its objectives and policies.”</u></i></p> <p>The proposal to establish a hierarchy on the order of the Strategic Directions in Chapter 2 is opposed by Contact Energy.</p>	Reject the relief sought by the submitter.
OS58.3	Joan Forret Pukawa D2 Trust	Oppose	<p>The submitter is seeking amendments to the Strategic Directions Objective 2.1.2. The amendments involve altering the order of the objectives.</p>	Reject the relief sought by the submitter insofar as it is consistent with the relief sought in the original submission by Contact Energy.

Krystal Foden

From: District Plan
Subject: FW: Further Submissions

From: Mark Chrisp <mark.chrisp@mitchelldaysh.co.nz>
Sent: Friday, 28 April 2023 10:59 AM
To: Hilary Samuel <hsamuel@taupo.govt.nz>
Subject: RE: Further Submissions

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 Hillary

Yes, that sounds fine with me.

Regards

 **Mark Chrisp**
Partner

+64 27 475 8383 | PO Box 1307, Hamilton 3240
www.mitchelldaysh.co.nz

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From: Hilary Samuel <hsamuel@taupo.govt.nz>
Sent: Friday, April 28, 2023 10:00 AM
To: Mark Chrisp <mark.chrisp@mitchelldaysh.co.nz>
Subject: Further Submissions

Hi Mark

Just entering further subs. Our online system which we put all the subs into is set up to exactly match Form 6. That means we have no "in parts" allowed. Are you comfortable that we delete all the "in parts" so support in part would become support and so on? We can move the qualification i.e. "accept the relief sought by the submitter only insofar as the outcome is consistent with the Waikato Regional Plan and the original submission by Contact Energy" and put that in the reasons box.

Sound ok?

Hilary Samuel Senior Policy Advisor

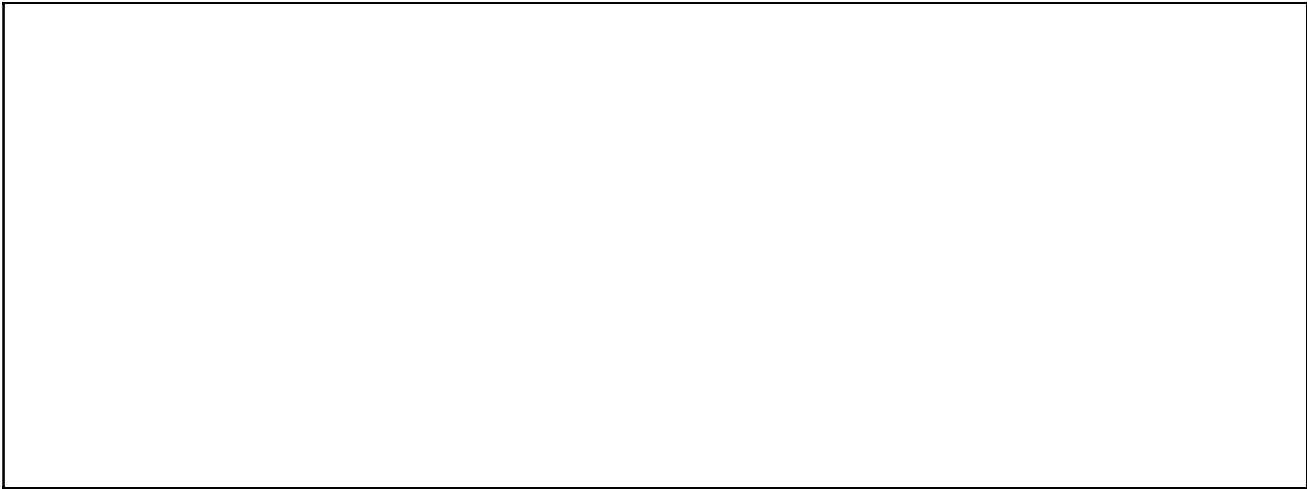
My office hours are school hours Monday, Tuesday, Thursday and Friday.

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First name: Sarah

Last name: Cameron

On behalf of:
Horticulture New Zealand

Postal address: PO Box 10232

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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 others make similar submissions, HortNZ will consider presenting a joint case with them at the hearing.

Attached Documents

File
PDF - FS HortNZ

Proposed Taupo District Plan

6 April 2023

To: Taupo District Council

Name of Submitter: Horticulture New Zealand

Contact for Service:

Sarah Cameron
Senior Policy Advisor
Horticulture New Zealand
PO Box 10-232 WELLINGTON
Ph: 021 446 281
Email: sarah.cameron@hortnz.co.nz

OVERVIEW

Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: Further submissions on behalf of HortNZ

Our submission

Horticulture New Zealand (HortNZ) made a submission on the proposed district plan and welcomes any opportunity to continue to work with council and to discuss our submission.

The details of HortNZ's further submissions and decisions we are seeking from council are set out below.

HortNZ's Role

Background to HortNZ

HortNZ represents the interests of approximately 5,500 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruit, and vegetables. The horticultural sector provides over 40,000 jobs.

There is approximately, 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain; and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

HortNZ's purpose is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand.



HortNZ's Resource Management Act 1991 Involvement

On behalf of its grower members HortNZ takes a detailed involvement in resource management planning processes around New Zealand. HortNZ works to raise growers' awareness of the Resource Management Act 1991 (RMA) to ensure effective grower involvement under the Act.



Further Submission

1. Horticulture New Zealand's (HortNZ) further submissions are contained in the attached table below.
2. HortNZ represents commercial fruit and vegetable growers in the Taupo district so represents a relevant aspect of the public interest.
3. HortNZ is not a trade competitor and could not gain any advantage in trade competition through this further submission.
4. HortNZ wishes to be heard in support of its further submissions.
5. If others make similar submissions, HortNZ will consider presenting a joint case with them at the hearing.

Further submission on behalf of HortNZ on Proposed Taupo District Plan

Plan Change 42 General Rural Environment and Rural Lifestyle Environment

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Hannah Ritchie NZ Pork Industry	OS22.1	Definitions Section 10 Intensive indoor primary production	Support	HortNZ supports inclusion of definitions from the National Planning Standards.	Include definition of intensive indoor primary production from National Planning Standards.
Hannah Ritchie NZ Pork Industry	OS22.2	Definitions Section 10 Primary production	Support	HortNZ supports inclusion of definitions from the National Planning Standards.	Include definition of primary production from National Planning Standards.
Hannah Ritchie NZ Pork Industry	OS22.3	Definitions Section 10 Sensitive activities	Support	HortNZ supports inclusion of a definition for sensitive activities as it will assist implementation of policy framework for reverse sensitivity.	Include a definition for sensitive activities as sought by the submitter.
Colin Guyton Federated Farmers of NZ	OS91.10	Definitions Section 10 Highly productive land	Support	HortNZ supports inclusion of definition and provisions for highly productive land.	Accept submission

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Trudi Burney Transpower NZ Ltd	OS110.11	Definitions Section 10 National Grid Yard	Support	HortNZ supports the inclusion of a definition for National Grid Yard.	Accept submission OS110.11
Trudi Burney Transpower NZ Ltd	OS110.12	Definitions Section 10 Sensitive activities	Oppose in part	Sensitive activities are defined in the NPSET as including schools, residential buildings and hospitals. The definition sought by the submitter is wider than the NPSET definition.	Include a definition for sensitive activities in the National Grid Yard consistent with the NPSET.
Hannah Ritchie NZ Pork Industry	OS22.4	3b.1 Introduction	Support	HortNZ supports alignment with the National Planning Standards and also additions to the description of the General Rural Environment to better describe primary production activities in the zone.	Accept submission OS22.4 and amend 3b.1 as sought by the submitter.
Tony Michelle NZ Agricultural Aviation Association	OS23.6	3b.2.1 Enable primary production	Support	HortNZ also supports the proposed objective to enable primary production.	Accept submission

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
James Ryan Manawa	OS57.8	3b.2.1 Enable primary production	Oppose	<p>The submitter seeks to amend the objective for primary production to include use of natural resources as a wider range of uses are anticipated in the General Rural Environment. HortNZ recognises that there are other activities that may be appropriate in the rural environment but considers that there should be separate objectives and that enabling primary production should be retained as a stand-alone objective.</p> <p>Objective 3b.2.4 provides for other activities including renewable electricity generation and transmission activities.</p> <p>In addition, the submitter seeks a new objective specifically for Renewable Electricity Generation and transmission activities</p>	Reject submission to amend 3b.2.1.

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Hayley Stronge Mecury	0568.15	3b.2.1 Enable primary production	Oppose	<p>The submitter seeks to amend the objective for primary production to include use of natural resources as a wider range of uses are anticipated in the General Rural Environment. HortNZ recognises that there are other activities that may be appropriate in the rural environment but considers that there should be separate objectives and that enabling primary production should be retained as a stand-alone objective.</p> <p>Objective 3b.2.4 provides for other activities including renewable electricity generation and transmission activities.</p> <p>In addition, the submitter seeks a new objective specifically for Renewable Electricity Generation and transmission activities.</p>	Reject submission to amend 3b.2.1.

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Alice Lin Genesis Energy	0584.13	3b.2.1 Enable primary production	Oppose	<p>The submitter seeks to amend the objective for primary production to include use of natural resources as a wider range of uses are anticipated in the General Rural Environment. HortNZ recognises that there are other activities that may be appropriate in the rural environment but considers that there should be separate objectives and that enabling primary production should be retained as a stand-alone objective.</p> <p>Objective 3b.2.4 provides for other activities including renewable electricity generation and transmission activities.</p> <p>In addition, the submitter seeks a new objective specifically for Renewable Electricity Generation and transmission activities.</p>	Reject submission to amend 3b.2.1.

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Mark Chrisp Contact Energy	0593.27	3b.2.1 Enable primary production	Oppose	<p>The submitter seeks to amend the objective for primary production to include use of natural resources as a wider range of uses are anticipated in the General Rural Environment. HortNZ recognises that there are other activities that may be appropriate in the rural environment but considers that there should be separate objectives and that enabling primary production should be retained as a stand-alone objective.</p> <p>Objective 3b.2.4 provides for other activities including renewable electricity generation and transmission activities.</p> <p>In addition, the submitter seeks a new objective specifically for Renewable Electricity Generation and transmission activities.</p>	Reject submission to amend 3b.2.1.

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
James Ryan Manawa	OS57.10	3b .2.x new objective	Support	The submitter seeks a new objective for Renewable Electricity Generation and transmission activities. This is supported rather than amending 3b.2.1.	Accept submission OS57.10 to include a new objective for Renewable Electricity Generation and transmission activities.
James Ryan Manawa	OS57.9	3b.2.2 Maintaining the established General Rural character	Support in part	The submitter seeks to amend the objective to focus on activities rather than the attributes of rural character. This change is not supported. Rural character can change so seeking to maintain the 'established' rural character is not appropriate. The rural character is described in 3b.2.9.	Accept submission in part by retaining objective 3b.2.2 but deleting 'established'.
Hayley Stronge Mercury Energy	OS68.16	3b.2.2 Maintaining the established General Rural character	Support in part	The submitter seeks to amend the objective to focus on activities rather than the attributes of rural character. This change is not supported. Rural character can change so seeking to maintain the 'established' rural character is not appropriate. The rural	Accept submission in part by retaining objective 3b.2.2 but deleting 'established'.

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Alice Lin Genesis Energy	0S84.14	3b.2.2 Maintaining the established General Rural character	Support in part	<p>character is described in 3b.2.9.</p> <p>The submitter seeks to amend the objective to focus on activities rather than the attributes of rural character. This change is not supported. Rural character can change so seeking to maintain the 'established' rural character is not appropriate. The rural character is described in 3b.2.9.</p>	Accept submission in part by retaining objective 3b.2.2 but deleting 'established'.
Mark Chrisp Contact Energy	0S93.28	3b.2.2 Maintaining the established General Rural character	Support in part	<p>The submitter seeks to amend the objective to focus on activities rather than the attributes of rural character. This change is not supported. Rural character can change so seeking to maintain the 'established' rural character is not appropriate. The rural character is described in 3b.2.9.</p>	Accept submission in part by retaining objective 3b.2.2 but deleting 'established'.

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Hayley Stronge Mercury	0568.17	3b.2.3 Rural Industry	Support	The submitter seeks a new objective for Renewable Electricity Generation and transmission activities. This is supported rather than amending 3b.2.1.	Accept submission OS68.17 to include a new objective for Renewable Electricity Generation and transmission activities.
Alice Lin Genesis Energy	0S84.15	3b.2.3 Rural Industry	Support	The submitter seeks a new objective for Renewable Electricity Generation and transmission activities. This is supported rather than amending 3b.2.1.	Accept submission OS84.14 to include a new objective for Renewable Electricity Generation and transmission activities.
Mark Chrisp Contact Energy	0S93.29	3b.2.3 Rural Industry	Support	The submitter seeks a new objective for Renewable Electricity Generation and transmission activities. This is supported rather than amending 3b.2.1.	Accept submission OS93.29 to include a new objective for Renewable Electricity Generation and transmission activities.
Hannah Ritchie NZ Pork	0S22.7	3b.2.4 Other activities	Support	The submitter seeks a change similar to that sought by HortNZ in that such activities should not adversely affect primary production.	Accept submissions to amend 3b.2.4 to ensure other activities do not adversely affect primary production.

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Trudi Burney Transpower NZ Ltd	OS110.15	3b.2.4 Other activities	Support in part	HortNZ supports an objective to provide for the National Grid but seek that it is consistent with the NPSET – which does not provide for protection of the National Grid.	Include an objective to recognise and provide for the National Grid, consistent with the NPSET.
Trudi Burney Transpower NZ Ltd	OS110.16	3b.2 New policy	Support in part	HortNZ supports an policy to provide for the National Grid but seek that it is consistent with the NPSET Policy 10 and 11 which seeks that activities to the extent reasonably possible do not cause reverse sensitivity or compromise the National Grid.	Ensure that any policy for the National Grid is consistent with NPSET Policies 10 and 11.
Trudi Burney Transpower NZ Ltd	OS110.17	3b.2 New objective	Support	The objective sought in the submission seeks that the National Grid is recognised and provided for, which is consistent with the NPSET.	Accept submission OS110.17
Luke Braithwaite Waka Kotahi	OS113.5	3b.2.5 Avoidance of reverse sensitivity	Oppose in part	While reverse sensitivity is an important issue any rule should not be limited to noise effects.	Reject submission

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Tony Michelle NZ Agricultural Association	OS23.10	3b.2.5 Avoidance of reverse sensitivity	Support	For the reasons given by the submitter.	Accept submission
James Ryan Manawa	OS57.13	3b.2.6 Impacts on infrastructure	Support in part	The submitter seeks that the objective does not provide an outcome to be achieved and seeks rewording to add 'do not compromise the safe and efficient functioning of infrastructure.' HortNZ considers that this is very absolute and does not take into account varying circumstances that may exist.	Amend 3b.2.6 as sought by the submitter and add 'to the extent reasonably possible'. Alternatively retain as notified.
Hayley Stronge Mercury	OS68.20	3b.2.6 Impacts on infrastructure	Support in part	The submitter seeks that the objective does not provide an outcome to be achieved and seeks rewording to add 'do not compromise the safe and efficient functioning of infrastructure.' HortNZ considers that this is very absolute and does not take into account varying circumstances that may exist.	Amend 3b.2.6 as sought by the submitter and add 'to the extent reasonably possible'. Alternatively retain as notified.

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Alice Lin Genesis Energy	OS84.18	3b.2.6 Impacts on infrastructure	Support in part	The submitter seeks that the objective does not provide an outcome to be achieved and seeks rewording to add 'do not compromise the safe and efficient functioning of infrastructure.' HortNZ considers that this is very absolute and does not take into account varying circumstances that may exist.	Amend 3b.2.6 as sought by the submitter and add 'to the extent reasonably possible'. Alternatively retain as notified.
Mark Chrisp Contact Energy Ltd	OS93.32	3b.2.6 Impacts on infrastructure	Support in part	The submitter seeks that the objective does not provide an outcome to be achieved and seeks rewording to add 'do not compromise the safe and efficient functioning of infrastructure.' HortNZ considers that this is very absolute and does not take into account varying circumstances that may exist.	Amend 3b.2.6 as sought by the submitter and add 'to the extent reasonably possible'. Alternatively retain as notified.
Annabelle Lee Radio NZ	OS112.6	3b.2.6 Impacts on infrastructure	Oppose	The submitter seeks stronger direction of 'avoid'. HortNZ considers that this strong	Reject submission

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Hannah Ritchie NZ Pork	OS22.9	3b.2.9 Maintaining the established character	Support	direction is not appropriate for infrastructure. HortNZ has sought changes to 3b.2.9 which includes similar matters sought by the submitter.	Include 'sights odour and dust associated with primary production' in 3b.2.9.
James Ryan Manawa	OS57.14	3b.2.9 Maintaining the established character	Oppose	The submitter seeks to amend the description of rural character by adding activities that may occur in the rural environment. The policy should describe the attributes of rural character, against which activities can be assessed. HortNZ has sought a rewording of the policy to better focus on attributes of rural character.	Reject OS57.14 to amend 3b.2.9.
Sarah Jane Luoni Manulife Forest	OS25.3	3b.2.9 Maintaining the established character	Support in part	HortNZ seeks amendments to 3b.2.9 but supports recognition of 'appropriate' vehicle movements from a site.	Policy 3b.2.9 e) to the following or similar meaning: e) Infrequent Appropriate vehicle movements to and from a site.

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Hayley Stronge Mercury	OS68.21	3b.2.9 Maintaining the established character	Oppose	The submitter seeks to amend the description of rural character by adding activities that may occur in the rural environment. The policy should describe the attributes of rural character, against which activities can be assessed. HortNZ has sought a rewording of the policy to better focus on attributes of rural character.	Reject OS68.21 to amend 3b.2.9.
Alice Lin Genesis	OS84.19	3b.2.9 Maintaining the established character	Oppose	The submitter seeks to amend the description of rural character by adding activities that may occur in the rural environment. The policy should describe the attributes of rural character, against which activities can be assessed. HortNZ has sought a rewording of the policy to better focus on attributes of rural character.	Reject OS84.19 to amend 3b.2.9.

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Mark Chrisp Contact Energy	0593.33	3b.2.9 Maintaining the established character	Oppose	The submitter seeks to amend the description of rural character by adding activities that may occur in the rural environment. The policy should describe the attributes of rural character, against which activities can be assessed. HortNZ has sought a rewording of the policy to better focus on attributes of rural character.	Reject OS93.33 to amend 3b.2.9.
Hayley Stronge Mercury	OS68.22	3b.2.10 Residential units	Support	Recognition of reverse sensitivity is supported.	Accept submission OS68.22 to include reverse sensitivity
Alice Lin Genesis	OS84.20	3b.2.10 Residential units	Support	Recognition of reverse sensitivity is supported.	Accept submission OS84.20 to include reverse sensitivity
Mark Chrisp Contact Energy	OS93.34	3b.2.10 Residential units	Support	Recognition of reverse sensitivity is supported.	Accept submission OS93.34 to include reverse sensitivity
Hannah Ritchie NZ Pork	OS22.11	3b.2.13 Avoiding reverse sensitivity	Support	HortNZ has sought changes to 3b.2.13 similar to those sought by the submitter based on location of sensitive activities.	Amend 3b.2.13 as sought by HortNZ and the submitter.

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
James Ryan Manawa	OS57.41	3b.2.13 Avoiding reverse sensitivity	Support in part	HortNZ has sought an amendment to 3b.2.13 that focuses on new sensitive activities.	Amend 3b.2.13 to focus on ensuring that new sensitive activities to not create reverse sensitivity effects.
Hayley Stronge Mercury	OS68.24	3b.2.13 Avoiding reverse sensitivity	Support in part	HortNZ has sought an amendment to 3b.2.13 that focuses on new sensitive activities.	Amend 3b.2.13 to focus on ensuring that new sensitive activities to not create reverse sensitivity effects.
Alice Lin Genesis Energy	OS84.22	3b.2.13 Avoiding reverse sensitivity	Support in part	HortNZ has sought an amendment to 3b.2.13 that focuses on new sensitive activities.	Amend 3b.2.13 to focus on ensuring that new sensitive activities to not create reverse sensitivity effects.
Mark Chrisp Contact Energy	OS93.36	3b.2.13 Avoiding reverse sensitivity	Support in part	HortNZ has sought an amendment to 3b.2.13 that focuses on new sensitive activities.	Amend 3b.2.13 to focus on ensuring that new sensitive activities to not create reverse sensitivity effects.
Annabelle Lee Radio NZ	OS112.7	3b.2.13 Avoiding reverse sensitivity	Support in part	HortNZ has sought an amendment to 3b.2.13 that focuses on new sensitive activities and supports the clarification that the submitter seeks.	Amend 3b.2.13 to focus on ensuring that new sensitive activities to not create reverse sensitivity effects.

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Graeme Mathieson Rural Contractors NZ Inc	OS109.4	3b.2.14 Commercial and industrial activity	Support	Clarification that rural industry are not commercial and industrial activities is appropriate. This may be more appropriate through a specific policy for rural industry.	Accept submission.
Helen Brosnan Permapine Ltd	OS56.14	3b.2.14 Commercial and industrial activity	Oppose	New and existing commercial and industrial activity is to be avoided in the rural zone and be provided for in the industrial zone	Reject submission
James Ryan Manawa	OS57.18	3b.3.1 Maintain the character of the rural lifestyle environment	Oppose	The submitter seeks to include rural residential activities where they don't give rise to reverse sensitivity effects in the surrounding environments. Reverse sensitivity is addressed in 3b.3.2 so the change is not necessary.	Reject submission.
Hayley Stronge Mercury	OS68.27	3b.3.1 Maintain the character of the rural lifestyle environment	Oppose	The submitter seeks to include rural residential activities where they don't give rise to reverse sensitivity effects in the surrounding environments.	Reject submission.

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Alice Lin Genesis Energy	0S84.25	3b.3.1 Maintain the character of the rural lifestyle environment	Oppose	Reverse sensitivity is addressed in 3b.3.2 so the change is not necessary. The submitter seeks to include rural residential activities where they don't give rise to reverse sensitivity effects in the surrounding environments. Reverse sensitivity is addressed in 3b.3.2 so the change is not necessary.	Reject submission.
Mark Chrisp Contact	0S93.39	3b.3.1 Maintain the character of the rural lifestyle environment	Oppose	The submitter seeks to include rural residential activities where they don't give rise to reverse sensitivity effects in the surrounding environments. Reverse sensitivity is addressed in 3b.3.2 so the change is not necessary.	Reject submission.
Duncan Whyte Tauhara Quarries Ltd	0S75.10	3b.3.3 Commercial and industrial activities	Oppose	Rural industry should not be included with commercial and industrial activities as rural industry should be anticipated in the Rural Zone but	Reject submission

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Annabelle Lee Radio NZ	OS112.11	3b.3.6 Impacts on community infrastructure	Oppose	The submitter seeks stronger direction of 'avoid'. HortNZ considers that this strong direction is not appropriate for infrastructure.	Reject submission
Sophie Andrews Ministry of Education	OS85.6	3b.2.9 Maintaining the established rural character	Oppose	While there are educational facilities in appropriate areas in the rural environment, given the broad definition of educational facilities it is inappropriate to anticipate all such activities as part of rural character.	Reject submission
Sophie Andrews Ministry of Education	OS85.8	Educational facilities in rural areas – new rule	Support in part	The submitter seeks a new restricted discretionary rule for educational facilities in the rural zones with matters of discretion.	Inclusion of a specific restricted discretionary rule for educational facilities is appropriate.
Hannah Ritchie NZ Pork	OS22.12	4b.1.1	Support in part	The submitter seeks a definition and rule structure for 'other intensive farming	Include a rule for extensive pig farming but not 'other intensive farming activities.'

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
		Activities in the General Rural Environment		activities' but it is unclear, other than extensive pig farming, what may be included in such a rule.	
Hannah Ritchie NZ Pork	OS22.14	4b.1.5 Commercial and industrial activities and home businesses	Support	HortNZ considers that commercial and industrial activities in the General Rural Environment should require a discretionary consent as they are not anticipated in that environment.	Accept submission OS22.14 and amend 4b.1.5 to discretionary for commercial and industrial activities.
Catriona Eagles Cheal Consultants	OS79.32	4b.1.5 Commercial and industrial activities and home businesses	Oppose in part	The definition of rural industry in the National Planning Standards includes rural industry or business undertaken in a rural environment that directly supports, services or is dependent on primary production. So if a rural business is commercial and meets that criteria then 4b.1.10 would apply and the activity would be restricted discretionary. These activities are distinct from commercial	Reject submission

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
James Ryan Manawa	OS57.28	4b.1.7 High voltage transmission lines	Oppose	<p>and industrial so there is no need to amend for rural industry and businesses.</p> <p>The submitter seeks to require all 'structures' within 12m of high voltage transmission lines to be a restricted discretionary activity. This submission is opposed.</p> <p>If the activity complies with NZECP34:2001 then the activity should be permitted, not just when being undertaken by a network utility operation.</p> <p>HortNZ seeks other changes to 4b.1.7.</p>	Reject submission OS57.28.
Hayley Stronge Mercury	OS68.40	4b.1.7 High voltage transmission lines	Oppose	<p>The submitter seeks to require all 'structures' within 12m of high voltage transmission lines to be a restricted discretionary activity. This submission is opposed.</p> <p>If the activity complies with NZECP34:2001 then the</p>	Reject submission

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
				activity should be permitted, not just when being undertaken by a network utility operation. HortNZ seeks other changes to 4b.1.7.	
Alice Lin Genesis	0S84.37	4b.1.7 High voltage transmission lines	Oppose	The submitter seeks to require all 'structures' within 12m of high voltage transmission lines to be a restricted discretionary activity. This submission is opposed. If the activity complies with NZECP34:2001 then the activity should be permitted, not just when being undertaken by a network utility operation. HortNZ seeks other changes to 4b.1.7.	Reject submission
Mark Chrisp Contact	0S93.52	4b.1.7 High voltage transmission lines	Oppose	The submitter seeks to require all 'structures' within 12m of high voltage transmission lines to be a restricted discretionary	Reject submission

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
				activity. This submission is opposed. If the activity complies with NZECP34:2001 then the activity should be permitted, not just when being undertaken by a network utility operation. HortNZ seeks other changes to 4b.1.7..	
Tim Lester The Lines Company	OS106.19	4b.1.7 High voltage transmission lines	Oppose	HortNZ opposes the application of a 12m setback for buildings from all local distribution lines. If the activity complies with NZECP34:2001 then the activity should be permitted, not just when being undertaken by a network utility operation.	Reject submission
Trudi Burney Transpower NZ Ltd	OS110.18 OS110.19	4b.1.7 High voltage transmission lines	Support in part	The submitter seeks that 4b.1.7 is deleted and replaced with other rules.	Amend 4b.1.7 as sought by HortNZ.

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Trudi Burney Transpower NZ Ltd	OS110.20	4b.1. General rules	Support in part Oppose in part	HortNZ supports inclusion of a specific rule for the National Grid but do not support the rule as sought by the submitter.	HortNZ does not support all activities not meeting performance standards to be non-complying. Earthworks should be restricted discretionary.
Trudi Burney Transpower NZ Ltd	OS110.21	4b.2 Performance Standards General Rural Environment	Support in part Oppose in part	HortNZ supports inclusion of a specific rule for the National Grid but do not support the rule as sought by the submitter.	Include a rule for the National Grid including matters sought in HortNZ submission and the following clauses as sought by the submitter: 1, 3a, 3b, 3d, 4, 5, 6 a, b and c But replace artificial screens with artificial crop protection structures.
Trudi Burney Transpower NZ Ltd	OS110.22	4b.1 General Rules General Rural Environment	Oppose in part	HortNZ supports in part a rule for earthworks in the National Grid Yard but does not support a non-complying activity where the performance standards cannot be met.	Amend the activity status if performance standards are not met to Restricted Discretionary.

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Trudi Burney Transpower NZ Ltd	OS110.23	4b.2 Performance Standards General Rural Environment	Support in part	HortNZ supports the exemption for agricultural cultivation but does not support the limitation for earthworks for reticulation and storage of water for irrigation purposes.	Accept submission but do not include exemption with a limitation for earthworks for reticulation and storage of water for irrigation purposes.
Catriona Eagles Cheal Consultants	OS79.34	4b.1.10 Intensive indoor primary production and rural industry	Oppose in part	HortNZ does not support the additional matters of discretion for rural industry that could be anticipated in the rural environment.	Reject submission
Carolyn McAlley Heritage NZ	OS96.10	4b.3 General Rules	Oppose in part	The submitter seeks a rule and assessment framework for earthworks activities not in outstanding natural landscape areas. The submission is not clear how this would be applied.	Reject submission.
Tim Lester The Lines Company	OS106.20	4b.3.7 High voltage transmission lines	Oppose	HortNZ opposes the application of a 12m setback for buildings from all local distribution lines.	Reject submission

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
				If the activity complies with NZECP34:2001 then the activity should be permitted, not just when being undertaken by a network utility operation.	
Tony Michelle NZ Agricultural Aviation Association	OS23.12	4b.2.13 Maximum noise other	Support	The change sought by the submitter clarifies the status of intermittent use of aircraft for agricultural aviation activities.	Accept submission
Dominic Adams Ballance Agri	OS78.7	4b.2.13 Maximum noise other	Support	The change sought by the submitter clarifies the status of intermittent use of aircraft for agricultural aviation activities	Accept submission
Luke Braithwaite Waka Kotahi	OS113.8	4b.2.15 Signage	Oppose	Limiting a sign to no more than 6 words and 40 characters is very restrictive.	Reject submission
Luke Braithwaite Waka Kotahi	OS113.36	4b.4.10 Signage	Oppose	Limiting a sign as sought is very restrictive.	Reject submission
Luke Braithwaite Waka Kotahi	OS113.9	4b.4.12	Oppose	Limiting artificial light in the rural area to 5 LUX does not	Reject submission

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
		Max artificial light level		adequately provide for light for health and safety and security.	
Luke Braithwaite Waka Kotahi	OS113.11	4b General Rural Environment New rule	Oppose in part	Any rule for reverse sensitivity should not be limited to effects of noise.	Reject submission
Colin Guyton Federated Farmers	OS91.20	4b.5.1 Subdivision – general rural environment	Oppose	A controlled activity subdivision rule does not provide appropriate assessment of potential adverse effects and subdivision to 4ha will lead to fragmentation of land.	Reject submission

Plan Change 38 Strategic Directions

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Colin Guyton Federated Farmers of NZ	OS91.1	Strategic Directions	Support in part	HortNZ supports the addition of a new strategic direction objective for primary production.	Include a new strategic direction objective for primary production.
Hannah Ritchie NZ Pork	OS22.17	2.2 Strategic Direction 2	Support	HortNZ has also opposed Strategic Objective 2.2 to ensure that the provision is	Delete 2.2 Strategic Direction 2 Freshwater Quality

Hannah Ritchie NZ Pork	OS22.19	Freshwater Quality	Support	linked with the function, powers and duties of the council.	Delete 2.2 Strategic Direction 2. Freshwater Quality
Colin Guyton Federated Farmers of NZ	OS91.3	2.2 Strategic Direction new objective	Oppose	HortNZ has opposed policies for freshwater as they are not linked to the function, powers and duties of the council.	Reject submission.
Hannah Ritchie NZ Pork	OS22.23	2.2 Strategic Direction new objective	Support	The submitter seeks a new strategic direction, objective and policies for the rural environment in the district. HortNZ has made a similar submission to ensure that the rural environment is appropriately recognised in the strategic direction.	Accept submissions on HortNZ and NZ Pork to include strategic direction, objective and policies for the rural environments.
Hayley Stronge Mercury	OS68.4	Strategic objectives 2.3.3 Policy	Support	The submitter seeks that development should not conflict with existing activities in the surrounding area. This is supported.	Accept OS68.4
Alice Lin Genesis Energy	OS84.2	Strategic objectives 2.3.3 Policy	Support	The submitter seeks that development should not conflict with existing activities in	Accept OS84.2

Mark Chrisp Contact Energy	OS93.9	Strategic objectives 2.3.3 Policy	Support	the surrounding area. This is supported.	Accept OS93.9
Andrea Curcio Lamas Retirement Villages Assoc of NZ	OS98.9	Strategic objectives 2.3.3 Policy Point 10	Oppose in part	The submitter seeks the deletion that development should not conflict with existing activities in the surrounding area. This is opposed.	Reject OS98.9
Colin Guyton Federated Farmers of NZ	OS91.6	2.5 Strategic Direction 5 significant and local infrastructure	Support	Recognition of reverse sensitivity effects infrastructure may have on existing land uses is supported.	Accept OS91.6.
Trudi Burney Transpower NZ Ltd	OS110.4	Strategic Direction 2.5.2 Objectives	Support	The new objective clarifies the status of the National Grid and is consistent with the NPSET.	Accept submission
Hayley Stronge Mercury	OS68.10	Strategic Direction 2.5.3 Policy	Support	A policy to 'recognise and provide' for infrastructure is supported.	Accept changes sought in OS68.10.
Alice Lin Genesis Energy	OS84.8	Strategic Direction 2.5.3 Policy	Support	A policy to 'recognise and provide' for infrastructure is supported.	Accept changes sought in OS84.8.

Mark Chrisp Contact Energy Ltd	OS93.15	Strategic Direction 2.5.3 Policy	Support	A policy to 'recognise and provide' for infrastructure is supported.	Accept changes sought in OS93.15.
Trudi Burney Transpower NZ Ltd	OS110.6	Strategic Direction 2.5.3 Policy	Oppose	The submitter seeks a new definition for regionally significant infrastructure. There should be clarity but a definition has not been specifically sought.	Reject submission.
Trudi Burney Transpower NZ Ltd	OS110.7	Strategic Direction 2.5.3 Policy	Oppose in part	The submitter seeks to delete reference to reverse sensitivity effects and add 'not compromise. Infrastructure. There should be provision that this should be to the extent reasonably possible.'	Either reject submission or include 'to the extent reasonably possible'.
Annabelle Lee Radio NZ	OS112.1	Strategic Directions 2.5 Direction 5 Significant and Local infrastructure	Oppose in part	The submitter seeks a definition for nationally significant infrastructure and regionally significant infrastructure but has not sought specific wording.	Reject submission

No.	Last Name	First Name	Submitter	Service Address	Organisation	On Behalf Of	Email	Point No.	FS Point No.	Original	Submission	Decision Sought	Reason for Decision Sought	Chapter	Lowest Clause	My comment
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140		Horticulture New Zealand	sarah.cameron@hortnz.co.nz	110.12	FS233.6	Seek amendment	Oppose	Reject definition sought by the submitter	sensitive activities are defined in the NPSET as including schools, residential buildings and hospitals. The definition sought by the submitter is wider than the NPSET definition.	Plan Change 42 - General Rural and Rural Lifestyle Environments	Amendments to the Definitions of the Taupo District Plan Section 10	
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140		Horticulture New Zealand	sarah.cameron@hortnz.co.nz	57.9	FS233.14	Seek amendment	Oppose	Reject changes sought by the submitter	The submitter seeks to amend the objective to focus on activities rather than the attributes of rural character. This change is not supported. Rural character can change so seeking to maintain the 'established' rural character is not appropriate. The rural character is described in 3b.2.9.	Plan Change 42 - General Rural and Rural Lifestyle Environments	Objective 3b.2.2 Maintaining the established General Rural character	
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140		Horticulture New Zealand	sarah.cameron@hortnz.co.nz	68.16	FS233.15	Oppose	Oppose	Reject changes sought by the submitter	the objective to focus on activities rather than the attributes of rural character. This change is not supported. Rural character can change so seeking to maintain the 'established' rural character is not appropriate. The rural character is described in 3b.2.9.	Plan Change 42 - General Rural and Rural Lifestyle Environments	Objective 3b.2.2 Maintaining the established General Rural character	
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140		Horticulture New Zealand	sarah.cameron@hortnz.co.nz	84.14	FS233.16	Oppose	Oppose	Reject changes sought by the submitter	The submitter seeks to amend the objective to focus on activities rather than the attributes of rural character. This change is not supported. Rural character can change so seeking to maintain the 'established' rural character is not appropriate. The rural character is described in 3b.2.9.	Plan Change 42 - General Rural and Rural Lifestyle Environments	Objective 3b.2.2 Maintaining the established General Rural character	
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140		Horticulture New Zealand	sarah.cameron@hortnz.co.nz	93.28	FS233.17	Oppose	Oppose	Reject changes sought by the submitter	The submitter seeks to amend the objective to focus on activities rather than the attributes of rural character. This change is not supported. Rural character can change so seeking to maintain the 'established' rural character is not appropriate. The rural character is described in 3b.2.9.	Plan Change 42 - General Rural and Rural Lifestyle Environments	Objective 3b.2.2 Maintaining the established General Rural character	
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140		Horticulture New Zealand	sarah.cameron@hortnz.co.nz	110.15	FS233.22	Seek amendment	Oppose	Reject changes sought by the submitter	HortNZ supports an objective to provide for the National Grid but seek that it is consistent with the NPSET – which does not provide for protection of the National Grid.	Plan Change 42 - General Rural and Rural Lifestyle Environments	Objective 3b.2.4 Other activities	
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140		Horticulture New Zealand	sarah.cameron@hortnz.co.nz	110.16	FS233.23	Seek amendment	Oppose	Reject changes sought by the submitter	HortNZ supports an policy to provide for the National Grid but seek that it is consistent with the NPSET Policy 10 and 11 which seeks that activities to the extent reasonably possible do not cause reverse sensitivity or compromise the National Grid.	Plan Change 42 - General Rural and Rural Lifestyle Environments	3b.2 Objectives and Policies - General Rural Environment	

233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140		Horticulture New Zealand	sarah.cameron@hortnz.co.nz	113.5	FS233.25	Seek amendment	Oppose	Reject submission	While reverse sensitivity is an important issue any rule should not be limited to noise effects.	Plan Change 42 - General Rural and Rural Lifestyle Environments	4 Rules and Standards
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140		Horticulture New Zealand	sarah.cameron@hortnz.co.nz	57.13	FS233.27	Seek amendment	Oppose	Reject changes sought by the submitter	The submitter seeks that the objective does not provide an outcome to be achieved and seeks rewording to add 'do not compromise the safe and efficient functioning of infrastructure.' HortNZ considers that this is very absolute and does not take into account varying circumstances that may exist.	Plan Change 42 - General Rural and Rural Lifestyle Environments	Objective 3b.2.6 Impacts on infrastructure
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140		Horticulture New Zealand	sarah.cameron@hortnz.co.nz	68.20	FS233.28	Oppose	Oppose	Reject changes sought by the submitter	The submitter seeks that the objective does not provide an outcome to be achieved and seeks rewording to add 'do not compromise the safe and efficient functioning of infrastructure.' HortNZ considers that this is very absolute and does not take into account varying circumstances that may exist.	Plan Change 42 - General Rural and Rural Lifestyle Environments	Objective 3b.2.6 Impacts on infrastructure
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140		Horticulture New Zealand	sarah.cameron@hortnz.co.nz	84.18	FS233.29	Seek amendment	Oppose	Reject changes sought by the submitter	The submitter seeks that the objective does not provide an outcome to be achieved and seeks rewording to add 'do not compromise the safe and efficient functioning of infrastructure.' HortNZ considers that this is very absolute and does not take into account varying circumstances that may exist.	Plan Change 42 - General Rural and Rural Lifestyle Environments	Objective 3b.2.6 Impacts on infrastructure
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140		Horticulture New Zealand	sarah.cameron@hortnz.co.nz	93.32	FS233.30	Seek amendment	Oppose	Reject changes sought by the submitter	The submitter seeks that the objective does not provide an outcome to be achieved and seeks rewording to add 'do not compromise the safe and efficient functioning of infrastructure.' HortNZ considers that this is very absolute and does not take into account varying circumstances that may exist.	Plan Change 42 - General Rural and Rural Lifestyle Environments	Objective 3b.2.6 Impacts on infrastructure
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140		Horticulture New Zealand	sarah.cameron@hortnz.co.nz	25.3	FS233.34	Seek amendment	Support	Accept submission that seeks recognition of appropriate vehicle movements from a site	HortNZ seeks amendments to 3b.2.9 but supports recognition of 'appropriate' vehicle movements from a site.	Plan Change 42 - General Rural and Rural Lifestyle Environments	Policy 3b.2.9 Maintaining the established character
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140		Horticulture New Zealand	sarah.cameron@hortnz.co.nz	57.41	FS233.42	Seek amendment	Support	Allow	HortNZ has sought an amendment to 3b.2.13 that focuses on new sensitive activities.	Plan Change 42 - General Rural and Rural Lifestyle Environments	Policy 3b.2.13 Avoiding reverse sensitivity

233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	68.24	FS233.43	Seek amendment	Support	Allow	HortNZ has sought an amendment to 3b.2.13 that focuses on new sensitive activities.	Plan Change 42 - General Rural and Rural Lifestyle Environments	Policy 3b.2.13 Avoiding reverse sensitivity
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	84.22	FS233.44	Seek amendment	Support	Allow	HortNZ has sought an amendment to 3b.2.13 that focuses on new sensitive activities.	Plan Change 42 - General Rural and Rural Lifestyle Environments	Policy 3b.2.13 Avoiding reverse sensitivity
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	93.36	FS233.45	Seek amendment	Support	Allow	HortNZ has sought an amendment to 3b.2.13 that focuses on new sensitive activities.	Plan Change 42 - General Rural and Rural Lifestyle Environments	Policy 3b.2.13 Avoiding reverse sensitivity
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	112.7	FS233.46	Seek amendment	Support	Allow	HortNZ has sought an amendment to 3b.2.13 that focuses on new sensitive activities and supports the clarification that the submitter seeks.	Plan Change 42 - General Rural and Rural Lifestyle Environments	Policy 3b.2.13 Avoiding reverse sensitivity
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	85.8	FS233.56	Seek amendment	Support	Accept submission for inclusion of a specific restricted discretionary rule for educational facilities	The submitter seeks a new restricted discretionary rule for educational facilities in the rural zones with matters of discretion.	Plan Change 42 - General Rural and Rural Lifestyle Environments	Amendments to the Definitions of the Taupo District Plan Section 10
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	22.12	FS233.57	Support	Support	Allow	The submitter seeks a definition and rule structure for 'other intensive farming activities' but it is unclear, other than extensive pig farming, what may be included in such a rule.	Plan Change 42 - General Rural and Rural Lifestyle Environments	4b.1.1 Activities in the General Rural Environment
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	79.32	FS233.59	Oppose	Oppose	Reject submission	In the National Planning Standards includes rural industry or business undertaken in a rural environment that directly supports, services or is dependent on primary production. So if a rural business is commercial and meets that criteria then 4b.1.10 would apply and the activity would be restricted discretionary. These activities are distinct from commercial and industrial so there is no need to amend for rural industry and businesses.	Plan Change 42 - General Rural and Rural Lifestyle Environments	4b.1.5 Commercial and industrial activities, and home businesses,
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	110.18	FS233.65	Oppose	Oppose	Reject changes sought by the submitter	The submitter seeks that 4b.1.7 is deleted and replaced with other rules. HortNZ has also sought other rule provisions for 4b.1.7.	Plan Change 42 - General Rural and Rural Lifestyle Environments	4b.1.7 High voltage transmission lines

233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	110.19	FS233.66	Oppose	Oppose	Reject changes sought by the submitter	The submitter seeks that 4b.1.7 is deleted and replaced with other rules. HortNZ has also sought other rule provisions for 4b.1.7.	Plan Change 42 - General Rural and Rural Lifestyle Environments	4b.1.7 High voltage transmission lines
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	110.20	FS233.67	Seek amendment	Oppose	Reject changes sought by the submitter	HortNZ supports inclusion of a specific rule for the National Grid but do not support the rule as sought by the submitter.	Plan Change 42 - General Rural and Rural Lifestyle Environments	4b.1 General Rules - General Rural Environment
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	110.21	FS233.68	Seek amendment	Oppose	Reject changes sought by the submitter	HortNZ supports inclusion of a specific rule for the National Grid but do not support the rule as sought by the submitter.	Plan Change 42 - General Rural and Rural Lifestyle Environments	4b.2 Performance Standards - General Rural Environment
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	110.22	FS233.69	Seek amendment	Oppose	Reject changes sought by the submitter	HortNZ supports in part a rule for earthworks in the National Grid Yard but does not support a non-complying activity where the performance standards cannot be met.	Plan Change 42 - General Rural and Rural Lifestyle Environments	4b.1 General Rules - General Rural Environment
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	110.23	FS233.70	Seek amendment	Oppose	Reject changes sought by the submitter	HortNZ supports the exemption for agricultural cultivation but does not support the limitation for earthworks for reticulation and storage of water for irrigation purposes.	Plan Change 42 - General Rural and Rural Lifestyle Environments	4b.2 Performance Standards - General Rural Environment
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	79.34	FS233.71	Seek amendment	Oppose	Reject submission	HortNZ does not support the additional matters of discretion for rural industry that could be anticipated in the rural environment.	Plan Change 42 - General Rural and Rural Lifestyle Environments	4b.1.10 Intensive indoor primary production and rural industry
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	96.10	FS233.72	Support	Oppose	Reject submission	The submitter seeks a rule and assessment framework for earthworks activities not in outstanding natural landscape areas. The submission is not clear how this would be applied.	Plan Change 42 - General Rural and Rural Lifestyle Environments	4b.3 General Rules - Rural Lifestyle Environment
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	113.11	FS233.79	Seek amendment	Oppose	Reject submission	Any rule for reverse sensitivity should not be limited to effects of noise.	Plan Change 42 - General Rural and Rural Lifestyle Environments	4b Rural Environment
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	91.1	FS233.81	Seek amendment	Support	Accept submission	HortNZ supports the addition of a new strategic direction objective for primary production.	Plan Change 38 - Strategic Directions	Chapter 2 Strategic Directions
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	98.9	FS233.89	Oppose	Oppose	Reject submission	The submitter seeks the deletion that development should not conflict with existing activities in the surrounding area. This is opposed.	Plan Change 38 - Strategic Directions	2.3.3 Policy

233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	110.6	FS233.95	Seek amendment	Oppose	Reject submission		Plan Change 38 - Strategic Directions	2.5.3 Policy
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	110.7	FS233.96	Seek amendment	Oppose	Reject changes sought by the submitter	The submitter seeks to delete reference to reverse sensitivity effects and add 'not compromise. Infrastructure. There should be provision that this should be to the extent reasonably possible.	Plan Change 38 - Strategic Directions	2.5.3 Policy
233	Cameron	Sarah	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Sarah Cameron on behalf of Horticulture New Zealand PO Box 10232 Wellington New Zealand 6140	Horticulture New Zealand	sarah.cameron@hortnz.co.nz	112.1	FS233.97	Seek amendment	Oppose-	Reject submission	The submitter seeks a definition for nationally significant infrastructure and regionally significant infrastructure but has not sought specific wording.	Plan Change 38 - Strategic Directions	2.5 Strategic Direction 5 Significant and Local Infrastructure

Organisation:

Kainga Ora Homes & Communities

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:** (09) 952 8546 Extn: 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 will consider presenting a joint case with them at a hearing.

Attached Documents

File
20230406 Kainga Ora Further Submission on Taupo PC38



Further Submission on Proposed Plan Change 38 (Strategic Directions) to the Operative Taupō District Plan by Kāinga Ora – Homes and Communities

Clause 8 of Schedule 1 to the Resource Management Act 1991

To: Taupō District Council
 Private Bag 2005, Taupō 3352
Submitted via email: districtplan@taupo.govt.nz

Name of Further Submitter: Kāinga Ora – Homes and Communities

1. **Kāinga Ora – Homes and Communities** (“**Kāinga Ora**”) makes this further submission on the Notified Plan Change 38 – Strategic Direction (“**PC38**”) in support of/in opposition to original submissions on PC38.
2. Kāinga Ora has an interest in PC38 that is greater than the interest the general public has, being an original submitter on the PC38 with respect to its interests as Crown entity responsible for the provision of public housing, and its housing portfolio in the Taupō District.
3. Kāinga Ora makes this further submission in respect of submissions by third parties to the PC38.

Reasons for further submission

4. The submissions that Kāinga Ora supports or opposes are set out in the table attached as **Appendix A** to this further submission.
5. The reasons for this further submission are:
 - (a) The reasons set out in the Kāinga Ora primary submission on the PC38.
 - (b) In the case of the Primary Submissions that are opposed:
 - (i) The Primary Submissions do not promote the sustainable management of natural and physical resources and are otherwise

inconsistent with the purpose and principles of the Resource Management Act 1991 (“**RMA**”);

- (ii) The relief sought in the Primary Submissions is not the most appropriate in terms of section 32 of the RMA;
- (iii) Rejecting the relief sought in the Primary Submissions opposed would more fully serve the statutory purpose than would implementing that relief; and
- (iv) The Primary Submissions are inconsistent with the policy intent of the Kāinga Ora primary submission.

(c) In the case of Primary Submissions that are supported:

- (i) The Primary Submissions promote the sustainable management of natural and physical resources and are consistent with the purpose and principles of the RMA and with section 32 of the RMA;
- (ii) The reasons set out in the Primary Submissions; and
- (iii) Allowing the relief sought in the Primary Submissions supported would more fully serve the statutory purpose than would disallowing that relief.

6. Without limiting the generality of the above, the specific relief in respect of each Primary Submission that is supported or opposed is set out in **Appendix A**.
7. Kāinga Ora wishes to be heard in support of its further submission.
8. If others make a similar submission, Kāinga Ora will consider presenting a joint case with them at a hearing.

DATED 6th April 2023

Kāinga Ora – Homes and Communities



Brendon Liggett
Manager – Development Planning

ADDRESS FOR SERVICE: *Kāinga Ora – Homes and Communities, PO Box 74598, Greenlane, Auckland. Attention: Development Planning Team*

Email: developmentplanning@kaingaora.govt.nz

Appendix A – Further Submission Table

Submitter Name	Original Submission Number	Provision/ Chapter Topic	Support/ Oppose/ Amend	Submission Point Summary	Decision Sought	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
Waikato Regional Council	OS29.2	Plan Change 38 - Strategic Directions > 2.3.2 Objectives	Amend	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.	Reword the objective as follows: <u>a. contributes to well-functioning and compact urban forms environments that provide for connected liveable communities;</u>	Support	Kāinga Ora supports the amendment and its alignment with the NPS-UD and agrees with the rewording of this objective.	Allow
Ryman Health	OS59.9	Plan Change 38 - Strategic Directions > 2.3.3 Policy	Oppose	<p>While RHL 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. Furthermore, RHL notes that proposed clauses (b) and (d) address the same matter (reverse sensitivity effects). As such, RHL recommends that clause (b) is removed, and clause (d) retained to cover reverse sensitivity effects.</p> <p>RHL seeks the following amendments: Manage subdivision, use and development of land to ensure that it will not in a way that considers:</p> <p>a. have an adverse effects on the functioning of the environment where it is located, b. unduly conflict with existing activities on adjoining properties, c. compromise development consistent with the intent and planned urban built form of the environment where it is located d. give rise to reverse sensitivity effects from existing uses</p>	<p>RHL seeks the following amendments: Manage subdivision, use and development of land to ensure that it will not in a way that considers:</p> <p>a. have an adverse effects on the functioning of the environment where it is located, b. unduly conflict with existing activities on adjoining properties, c. compromise development consistent with the intent and planned urban built form of the environment where it is located d. give rise to reverse sensitivity effects from existing uses</p>	Support in Part	Kāinga Ora agree that clause b is repetitive and support the removal of clause b. However, in terms of clause d, Kāinga Ora opposes the relief sought in relation to reverse sensitivity effects and considers that effects from the operation of certain activities, should first be mitigated at the source. Kāinga Ora considers that a policy requiring decision makers to protect existing uses from reverse sensitivity effects that might arise from new activities taking place in those areas is ambiguous, overly directive, and places undue responsibility on the receiving environment to mitigate adverse effects.	Allow in Part

Submitter Name	Original Submission Number	Provision/ Chapter Topic	Support/ Oppose/ Amend	Submission Point Summary	Decision Sought	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
Mercury	OS68.4	Plan Change 38 - Strategic Directions > 2.3.3 Policy	Amend	Conflicts need to be avoided with activities in the wider surrounding environment, not just on adjoining properties. Reverse sensitivity effects do not arise from "existing uses". They arise from new or expanded sensitive activities locating in proximity to existing uses.	Amend Policy 2.3.3(10) to read as follows: 10. Manage subdivision use and development of land to ensure that it will not: a. ... b. unduly conflict with existing activities on adjoining properties and the surrounding areas, ... d. give rise to reverse sensitivity effects from existing uses	Oppose	Kāinga Ora opposes this relief, noting that the presence of infrastructure in proximity to residential areas enabled for intensification does not, in and of itself, present a reverse sensitivity effect warranting additional controls or management.	Disallow
Genesis	OS84.2	Plan Change 38 - Strategic Directions > 2.3.3 Policy	Amend	Genesis generally supports the proposed policies. However, in respect of Policy 10, Genesis considers conflicts need to be avoided with activities in the wider surrounding environment, not just on adjoining properties. In addition, reverse sensitivity effects do not arise from "existing uses" – they arise from new or expanded sensitive activities locating in proximity to existing uses. Suggested changes are therefore made to accurately reflect the intent of Policy 10.	Retain provisions subject to amendments below 5. Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure (including development and <u>of</u> additional infrastructure),... 10. Manage subdivision use and development of land to ensure that it will not: a.... b. unduly conflict with existing activities on adjoining properties <u>and</u> the <u>surrounding</u> areas, c.... d. give rise to reverse sensitivity effects from existing uses	Oppose	Kāinga Ora opposes this relief, noting that the presence of infrastructure in proximity to residential areas enabled for intensification does not, in and of itself, present a reverse sensitivity effect warranting additional controls or management.	Disallow
Department of Conservation	OS89.7	Plan Change 38 - Strategic Directions > 2.3.3 Policy	Amend	The Director-General requests an amendment to strengthen the wording of proposed Policy 12 and thereby have better regard to section 6 of the RMA.	12. Do not support <u>Avoid</u> subdivision and development which will inappropriately affect heritage sites or	Oppose	Kāinga Ora notes that the use of the term 'avoid' in is contrary to the directive under Environmental Defence Society Inc v New Zealand King Salmon Company.	Disallow

Submitter Name	Original Submission Number	Provision/ Chapter Topic	Support/ Oppose/ Amend	Submission Point Summary	Decision Sought	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
					areas of important natural and landscape values			
Heritage New Zealand Pouhere Taonga (HNZPT)	OS96.7	Plan Change 38 - Strategic Directions > 2.5.3 Policy	Amend	HNZPT is concerned that there is no recognition in this section for the protection of cultural and historic heritage which can be vulnerable at the time of the installation of both significant and local infrastructure. This is particularly important given the low level of scheduling of cultural and historic heritage items within the Plan. HNZPT does not consider that this approach is sufficient to provide for the protection of cultural and historic heritage, particularly given that significant and local infrastructure can be located outside the urban boundary	That 2.5 Strategic Direction 5 Significant and Local infrastructure, 2.5.3 Policy is retained and policy 4 is amended as follows: 4: Planning and development of infrastructure will consider the needs and wellbeing of current and future communities, <u>including protecting cultural and historic heritage.</u>	Oppose	Kāinga Ora notes that cultural and historic heritage is already protected through the District Plan's provisions, Scheduled Sites and through HNZPT Act 2014 and this policy is unnecessary.	Disallow
LWAG	OS101.2	Plan Change 38 – Strategic Directions > 2.2 Strategic Direction 2 Freshwater Quality / Te Mana O Te Wai	Amend	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.	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).	Support in Part	Kāinga Ora supports the principle of managing the adverse effects of urban development on the health and wellbeing of the awa. However, considers that there should be flexibility of response to stormwater management on a site-by-site basis.	Allow in Part

Krystal Foden

From: Hilary Samuel
Sent: Friday, 28 April 2023 11:32 AM
To: District Plan
Subject: FW: Further submission - con-compliant points

Kiangaora's confirmation of points below – note I have split one out as they agreed with one bit but not another.

Hilary Samuel Senior Policy Advisor

My office hours are school hours Monday, Tuesday, Thursday and Friday.

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Private Bag 2005 • Taupō Mail Centre • Taupō 3352 • New Zealand

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From: Gurv Singh <Gurv.Singh@kaingaora.govt.nz>
Sent: Friday, 28 April 2023 11:25 AM
To: Hilary Samuel <hsamuel@taupo.govt.nz>
Cc: developmentplanning <developmentplanning@kaingaora.govt.nz>
Subject: RE: Further submission - con-compliant points

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Kia ora Hilary,

That is fine. Thank you.

Ngā mihi | Kind regards

Gurv Singh

From: Hilary Samuel <hsamuel@taupo.govt.nz>
Sent: Friday, 28 April 2023 10:52 AM
To: Gurv Singh <Gurv.Singh@kaingaora.govt.nz>
Subject: Further submission - con-compliant points

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Hi Gurv

For your further submission, there are a couple of points that are non-compliant with the RMA form 6. Mostly because you cannot support or oppose in part (and our online form is set up to exactly match the RMA form so we cannot enter anything else).

Can you please check the amendments to two points below and confirm you are comfortable? I have split the first one up so that you can support and oppose the different clauses accordingly.

234	Singh	Gurv	Gurv Singh for Kainga Ora Homes & Communities	Gurv Singh for Kainga Ora Homes & Communities PO Box 2628 Wellington New Zealand 6140	Kainga Ora Homes & Communities	gurv.singh@kaingaora.govt.nz	59.9	FS234.2	Oppose
234	Singh	Gurv	Gurv Singh for Kainga Ora Homes & Communities	Gurv Singh for Kainga Ora Homes & Communities PO Box 2628 Wellington New Zealand 6140	Kainga Ora Homes & Communities	gurv.singh@kaingaora.govt.nz	59.9B	FS234.2	Oppose

234	Singh	Gurv	Gurv Singh for Kainga Ora Homes & Communities	Gurv Singh for Kainga Ora Homes & Communities PO Box 2628 Wellington New Zealand 6140	Kainga Ora Homes & Communities	gurv.singh@kaingaora.govt.nz	101.2	FS234.7	Seek amendmen

Hilary Samuel Senior Policy Advisor

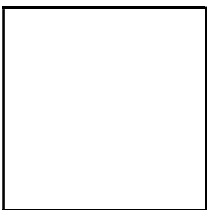
My office hours are school hours Monday, Tuesday, Thursday and Friday.

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Private Bag 2005 • Taupō Mail Centre • Taupō 3352 • New Zealand

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Please:

- (1) reply promptly to that effect, and remove this email, any attachment and the reply from your system;
- (2) do not use, disclose or act on this email in any other way. Thank you.

Organisation:

Waka Kotahi NZ Transport Agency (Waka Kotahi)

First name: Luke**Last name:** Braithwaite**Postal address:** PO Box 13055, Tauranga Central**Suburb:****City:** Tauranga**Country:** New Zealand**Postcode:** 3141**Email:** luke.braithwaite@nzta.govt.nz**Daytime Phone:** (04) 978 2643

- 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:

I will consider presenting a joint case with other submitters, who make a similar further submission, at a hearing

Attached Documents

File
Waka Kotahi NZ Transport Agency Further Submission on the Taupo District Plan Changes 38 and 42

RMA Form 6

Further submission – Proposed Taupō District Plan Changes 38 & 42

Clause 8 of First Schedule, Resource Management Act 1991

To: Taupō District Council
Email to: districtplan@Taupō.govt.nz
Subject: Further submission - Taupō District Plan Changes 38-43
Post: Proposed District Plan, Taupō District Council, Private Bag 2005, Taupō 3352

Further Submitter Contact Details			
Full Name	<i>Last Name</i>		<i>First Name</i>
	Wood		Mike
Or Company / Organisation Name <i>if applicable</i>	Waka Kotahi NZ Transport Agency (Waka Kotahi)		
Contact Person <i>if different</i>	Luke Braithwaite (Planner)		
Email Address for Service	Luke Braithwaite: luke.braithwaite@nzta.govt.nz & Environmental Planning: Environmentalplanning@nzta.govt.nz		
Address	Level 3, Harrington House, 32 Harrington Street <i>PO Box 13055, Tauranga Central,</i>		
	<i>City</i>	<i>Postcode</i>	
	Tauranga	3141	
Phone	<i>Mobile</i>	<i>Home</i>	<i>Work</i>
			Luke Braithwaite: (04) 978 2643
Attendance and wish to be heard at the hearing:			
<input type="checkbox"/> I do not wish <input checked="" type="checkbox"/> I wish To be heard in support of my further submission			
<input checked="" type="checkbox"/> I will <input type="checkbox"/> I will not consider presenting a joint case with other submitters, who make a similar further submission, at a hearing.			

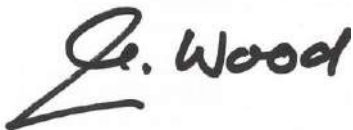
Relevance:

- I am a person representing a relevant aspect of the public interest
- I am a person who has an interest in the proposal that is greater than the interest the general public has
- I am the local authority for the relevant area

Explain/specify the grounds for saying that you come within this category (you must fill this in):

Waka Kotahi NZ Transport Agency is a Crown Entity with statutory obligations of ensuring an integrated, safe and sustainable transport system.

Signature of person making further submission
(or person authorised to sign on behalf of
person making further submission)



Mike Wood - Principal Planner – Poutiaki Taiao (Environmental Planning)

18 April 2023

Submitter Name/Contact	Submission Number	Chapter	Support or Oppose	The particular parts of the submission I support or oppose are:	The reasons for my support or opposition are:	I seek that the whole submission be allowed or disallowed:
Hannah Ritchie New Zealand Pork Industry Board	OS22.3	Definitions (Section 10)	Oppose	Waka Kotahi supports the inclusion of a definition of sensitive activities. However, this definition does not cover all sensitive activities; and does not include those areas that may not be sensitive within a building.	Waka Kotahi supports the intent of the definition, however notes that there are missing aspects of the definition to cover all sensitive activities. If a definition is to be included for sensitive activities Waka Kotahi seeks for this wording to be the wording identified on Page 14 of Waka Kotahi Section 32 report submitted alongside our Primary Submission.	That the submission is disallowed.
Hayley Stronge Mercury	OS68.64	Definitions (Section 10)	Support	Waka Kotahi supports the inclusion of the term "Reverse Sensitivity" and the wording as proposed.	The wording proposed is consistent with the wording within the Waikato Regional Policy Statement. Waka Kotahi supports the use of this definition within the Taupō District Plan.	That the submission be allowed.
Mark Chrisp Contact Energy Limited	OS93.78	Definitions (Section 10)	Support	Waka Kotahi supports the inclusion of the term "Reverse Sensitivity" and the wording as proposed.	The wording proposed is consistent with the wording within the Waikato Regional Policy Statement. Waka Kotahi supports the use of this definition within the Taupō District Plan.	That the submission be allowed.
Sarah Cameron Horticulture New Zealand	OS26.15	Definitions (Section 10)	Oppose	Waka Kotahi supports the inclusion of a definition for the term "Reverse Sensitivity" however does not support the wording proposed.	While Waka Kotahi supports the inclusion of a definition for reverse sensitivity, however the wording proposed is inconsistent with the preferred wording within the Waikato Regional Policy Statement.	That the submission be disallowed.
Helen Brosnan Permapine Limited	OS56.2	Definitions (Section 10)	Oppose	Waka Kotahi is opposed to the inclusion for a definition for Heavy Vehicle Movements.	The inclusion of a definition for heavy vehicle movements appears to be superfluous given the existing definition for "truck" and "Equivalent vehicle movements (e.v.m.)" in the definitions of the District Plan.	That the submission be disallowed.
Joao Paulo Silva Waikato Regional Council	OS29.4	Plan Change 38 - Strategic Directions > 2.3.2 Objectives	Oppose	Waka Kotahi understand that the intent of this change is likely for the purpose of limiting private development in geothermal hazard areas. However, as worded the objective would also capture the state highway roading network through this area if works are required to be undertaken outside of our designation.	Waka Kotahi notes that sections of the state highway network are located in close proximity to geothermal hazard areas. Therefore, Waka Kotahi opposes the objective wording as this would exclude all roading and infrastructure within this area. Directing infrastructure of scale such as the state highway and associated infrastructure away from this area may not be possible or practicable.	That the submission be disallowed.
Joao Paulo Silva Waikato Regional Council	OS29.9	Plan Change 38 - Strategic Directions > 2.5 Strategic Direction 5 Significant and Local Infrastructure	Support	Waka Kotahi supports the inclusion of State Highways 30 and 46 into Strategic Direction 5.	Waka Kotahi supports correcting the error in Strategic Direction 5 to include all state highways within the Taupō District.	That the submission be allowed.
Sarah Cameron Horticulture New Zealand	OS26.20	Plan Change 42 - General Rural and Rural Lifestyle Environments > 3 Objectives and Policies	Support	Waka Kotahi supports the inclusion of a new objective to the effect of providing for those activities that are for primary production of support this function in the rural environment.	This objective ensures that only those activities that are either primary production or required to be located within the Rural Zone are provided for by this objective.	That the submission be allowed.
Catriona Eagles Cheal Consultants	OS79.44	Plan Change 42 - General Rural and Rural Lifestyle Environments > 4b.1 General Rules - General Rural Environment	Oppose	The submitter has not provided sufficient information to understand which of the Restricted Discretionary rules activities may result in non-notification of a resource consent.	Without understanding what sections of the plan this non-notification may apply to Waka Kotahi is opposed to the submission point. Where there are effects that may impact the state highway, Waka Kotahi seeks for Council to have the ability to notify the consent application.	That the submission be disallowed.
Hayley Stronge Mercury	OS68.36	Plan Change 42 - General Rural and Rural Lifestyle Environments > 4b.1.2 Minor residential units	Support	Waka Kotahi supports the amendments sought to the matter of discretion 'f' to ensure that when considering minor residential units, the avoidance of reverse sensitivity effects is assessed.	Minor residential units also have the ability to result in reverse sensitivity effects if these are not appropriately located or designed. The changes sought in the submission are appropriate. That the amendments sought in matter of discretion 'f' are allowed. Waka Kotahi is neutral to the addition of matter of discretion 'l'.	That the submission be allowed.

Submitter Name/Contact	Submission Number	Chapter	Support or Oppose	The particular parts of the submission I support or oppose are:	The reasons for my support or opposition are:	I seek that the whole submission be allowed or disallowed:
Kirsteen McDonald McKenzie & Co	OS61.10	Plan Change 42 - General Rural and Rural Lifestyle Environments > Planning Maps	Oppose	<p>Waka Kotahi is reliant that the Taupō District Council that they have identified sufficient rural residential areas in location that they deem appropriate within the Taupō District.</p> <p>Based on the zoning that Council have identified, Waka Kotahi would not want to see additional rural residential rezoning of land to the scale proposed in this submission, where a significant portion of this is reliant on access directly or indirectly via the state highway network.</p>	<p>State Highway 1 is a nationally significant route and State Highway 5 is a regionally significant route. Their function is not intended to provide for the scale of rural residential subdivision proposed with sole reliance on the highway for access.</p> <p>It is considered that the Taupō District council have identified sufficient areas for rural residential zones that provides for the requirements of the district.</p> <p>There has been no traffic assessment provided alongside this submission so that the effects on the transport network can be understood.</p> <p>The proposal is considered contrary to Policy 1 (c) and (e) of the NPS-UD, as this will result in development that does not have good accessibility and does not support reductions in greenhouse gas emissions.</p>	That the submission be disallowed.

Organisation:

Te Kotahitanga o Ngati Tuwharetoa

First name: George**Last name:** Asher**Postal address:** PO Box 315**Suburb:****City:** Turangi**Country:** New Zealand**Postcode:** 3353**Email:** geoera@xtra.co.nz**Daytime Phone:** 021 368 566

- I could
- I could not

Gain an advantage in trade competition through this submission

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

- a. adversely affects the environment, and
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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:

Where other parties are expressing a similar concern, TKNT will consider presenting jointly with them at the Hearing.

Attached Documents

File
Final Further submissions Taupo District Plan Change 38

Proposed Plan Change 38: 'Strategic Direction' to the Taupō District Plan.

FURTHER SUBMISSIONS

To: Taupō District Council
 30 Tongariro Street
 Taupō 3330
 Private Bag 2005
 Via email: districtplan@taupo.govt.nz

Further Submissions on: **Proposed Plan Change 38 'Strategic Direction' to the Taupo District Plan.**

Date: **7 April 2023**

Submission by: **Te Kotahitanga o Ngati Tuwharetoa**
 Phone: 021 228 8315 | Email: patai@tknt.maori.nz
 130 Atirau Road / PO Box 315 Turangi 3353,
 Aotearoa New Zealand
 Website: www.tekotahitangaotuwaharetoa.co.nz

Address for service: **George Asher**
Te Poari Mahi | Te Kotahitanga o Ngati Tuwharetoa
 | Email: geoera@xtra.co.nz
 Phone: 021 368 566

1 INTRODUCTION

- 1.1 Te Kotahitanga o Ngāti Tūwharetoa ('TKNT') welcomes the opportunity to provide further submissions on Proposed Plan Change 38 'Strategic Direction' (PC38) to the Taupō District Plan ('TDP').
- 1.2 TKNT has a general interest in all plan changes 38 to 43, however, limited resource capacity has confined our focus on further submissions to PC38. In this respect we request that our
- 1.3 TKNT representation comprises Te Ariki (Paramount Chief) and the 26 active hapū of Ngāti Tūwharetoa. TKNT is mandated and authorised by statute (the Ngāti Tuwharetoa Claims Settlement Act, 2018) to act as the representative of Ngāti Tūwharetoa in dealing with the Crown, local and regional authorities, other iwi and other external agencies.
- 1.4 TKNT is committed to upholding the mana of hapū of Ngāti Tūwharetoa and to supporting and assisting whanau to maintain their relationship with their ancestral land and other taonga tuku iho, a matter that is intrinsic to restoring, protecting and enhancing their health and well-being including the taiao to which they are intimately connected. These relationships when considered in context of the whakapapa, kawa, tikanga and mātauranga of each hapū of Ngāti Tūwharetoa constitute an interest in PC38 and PC42, that, for TKNT and its constituent hapū members, is greater than the general public interest.
- 1.5 A key intention of TKNT is to achieve beneficial environmental and resource management outcomes for the Taupō catchment and the Rohe of Ngāti Tūwharetoa. To achieve this outcome, it is necessary to ensure that the kawa, tikanga, values and mātauranga of Ngāti

Tūwharetoa is acknowledged and provided for within the policies and plans that shape the decisions within the Taupo District and the Rohe of Ngāti Tūwharetoa.

- 1.6 Instrumental to achieving this intention has been the establishment of a statutory joint committee, **Te Kōpu ā Kānapanapa** (Ngāti Tūwharetoa Claims Settlement Act, 2018), a joint committee comprised of membership from Te Kotahitanga o Ngāti Tūwharetoa, Waikato Regional Council and Taupō District Council.
- 1.7 The purpose of Te Kōpu ā Kānapanapa is to restore, protect and enhance the environmental, cultural and spiritual wellbeing of the Taupō catchment and provide for the health, well-being and prosperity of Ngāti Tūwharetoa and all members of the community including future generations.
- 1.8 One of the key 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.
- 1.9 The statutory requirements of Te Kaupapa Kaitiaki are set out in Sections 181-182 (Ngāti Tūwharetoa Claims Settlement Act, 2018). 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.

2. FURTHER SUBMISSIONS

- 2.1. TKNT has been assigned the submitter number 115. TKNT wishes its further submissions to be read in conjunction with its earlier submissions on Plan Changes 38 and Plan Change 42
- 2.2. This section sets out further submissions in respect of submissions made by other parties in PC38 and PC42. The accompanying table also sets out whether TKNT supports or opposes (either fully or in part) these further submissions, the reasons for TKNT's position and the relief sought. TKNT will attempt to provide copies of this further submission to each of the parties whose further submission TKNT is supporting or opposing.
- 2.3. TKNT wishes to be heard in support of these further submissions. Where other parties are expressing a similar concern, TKNT will consider presenting jointly with them at the Hearing.
- 2.4. As noted in para 2.1(above), TKNT has made submissions on Plan Changes 38 and 42. TKNT acknowledge that these earlier submissions are supported in part, and in full, by submitters of further submissions. In particular, TKNT support those submitters who seek policy and provisions for freshwater and water bodies to be managed in accordance with the hierarchy and principles of Te Mana o te Wai and those who support the provision of greater flexibility for Papakainga Housing.

FURTHER SUBMISSIONS

Plan Change 38 -Strategic Directions

Further Submission Point	Submitter	Submission Number	Submission point by Submitter	Support/ Oppose	Reason for my response	Relief Sought
1	Waikato Regional Council	OS29.4	WRC seek a new bullet point to Objective 2.3.2(1) to Ensure that building, roading and infrastructure developments are directed away from geothermal resources in Taupo and Turangi	Oppose in part	Many essential existing structures already exist in 'potential' risk locations. It is important that such a requirement is preceded by a valid professional assessment of the geothermal hazard that the risk relates to.	That TDC or the Regional authority provide a proper and precise identification and risk assessment of the geothermal hazard prior to directing or preventing building, roading and infrastructure developments.
2	Waikato Regional Council	OS29.5	WRC seeks amendment to policy 2.2.3 to achieve better consistency with Section 181 of the Ngati Tuwharetoa Claims Settlement Act 2018.	Support	To ensure that PC - 38 complies with the statutory obligation within Section 181 of the Ngati Tuwharetoa Settlement Act, 2018 in respect of Te Kaupapa Kaitiaki (approved by Te Kōpu ā Kānapanapa Committee in November 2022) as requested in TKNT submissions OS 115.15 and OS 115.3	Support amendment to policy 2.2.3, however, PC- 38 must ensure that all its policies recognise and provide for the vision,, objectives, values, and desired outcomes in Te Kaupapa Kaitiaki

3	Waikato Regional Council	OS29.11	To include a new policy in 2.6.3. to "map as SNAs, all geothermal areas that meet the Waikato Regional Policy Statement definition of SNA, and ensure their protection."	Oppose	A disproportionate area of land assigned as SNAs is located on Māori land and land owned by Māori in general land title (eg. Treaty settlement land) This land has been mapped and subjected to protection and restrictive land use rules without proper consultation with the Māori landowners or their mandated representatives and without assessment of the social, cultural, spiritual and economic impact on the owners and the hapu kaitiaki at place.	As explained within OS115.13, TKNT Seek a total prohibition on the assignment of SNAs on Māori owned lands pending <ul style="list-style-type: none"> a) an agreement with local authorities to a fair and equitable process and agenda to re-engage in discussions on Natural Environmental Values. b) an agreement that all ecosystem services produced by Maori land owners are fully evaluated and a system of compensation is agreed and implemented to reward/compensate the loss of land use and the contribution of the landowners and kaitiaki hapū whose land is utilised for ecosystem or biodiversity services/contributions.
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Further Submission Point	Submitter	Submission Number	Submission point by Submitter	Support/ Oppose	Reason for my response	Relief Sought
4	Dept. of Conservation	OS89.1	Align the review of PC - 38 provisions with the policy direction and requirements anticipated under the NPSIB Clause 3.9 of the NPS-IB (Exposure Draft) sets out the process for identifying SNAs in district plans including notifying any plan or plan change to include each area in its district that is identified as qualifying as an SNA. The Plan must include <ul style="list-style-type: none"> a) the location of the SNA and a description of its attributes; and b. a map of the area; and c. specify whether the SNA is a geothermal SNA. 	Oppose	The reason for my response is set out in Further Submissions Point 3 (above).	The relief sought is set out in Further Submissions Point 3 (above).
Further Submission Point	Submitter	Submission Number	Submission point by Submitter	Support/ Oppose	Reason for my response	Relief Sought
5	Dept. of Conservation	OS89.2	Seeks to include an objective and/or policy in relation to biodiversity offsetting and biodiversity compensation, including definitions for biodiversity offsetting and biodiversity compensation. This could be included within the Natural Environmental Values section of the Strategic Direction chapter	Support in part	In particular TKNT support the inclusion of an objective and policy on compensation as a priority with particular emphasis placed on Maori land and Maori owned land (general land) on which SNAs may be located.	The relief sought is for the inclusion of an objective and policy on compensation provided it is developed and agreed as per the process of consultation and agreement outlined in Further Submissions Point 3 (above).
6	Dept. of Conservation	OS89.3	Support for the tangata whenua section, noting that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the chapter.	Support	Agree that that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the chapter.	Support the 'corrections' in this section prior to Plan Change 38 becoming operative e.g. "the Te Tiriri o Waitangi" should be corrected to "Te Tiriti o Waitangi"; "mautaranga" should be corrected to "mātauranga".
7	Dept. of Conservation	OS89.4	Endorse giving effect to NPS-FM especially in respect of Te Mana o te Wai.	Support	Agree that iwi/hapu/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the cultural objectives and policies within this section.	Support iwi/hapu/whanau requests for specific changes consistent with Te Kaupapa Kaitiaki ("wider planning documents").
8	Dept. of Conservation	OS89.6	Generally supports Papakainga provisions that enable Māori to occupy their ancestral land in line with Part 2 of the RMA	Support	Endorse support and the note that iwi/hapū/whanau are best placed to provide specific comments in relation to the appropriateness of the content and wording of the policy	Support iwi/hapu/whanau including landowners requests for specific changes to this Papakainga policy.

Te Kotahitanga o Ngati Tuwharetoa - Matters for Plan Change 38 – Further Submissions

Submission Table						
<ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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 Number (see above)	Submitter Name / Submission Number / (refer to the submission summary report and contact list)	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.
PC38	Waikato Regional Council	29.4	Oppose	Many essential existing structures already exist in 'potential' risk locations. It is important that there is a requirement for existing and proposed infrastructure is preceded by a proper assessment of any geothermal hazards or risk that may exist.	Disallow Allow in Part	Whole Part of the provision– calls for clear identification of hazard and refined direction vs blanket prohibition from geothermal land where g.resources exist.

Commented [HS1]: Is this correct George? Normally oppose goes with disallow and support goes with allow.

PC38	DOC	89.2	Support In part I support the objective/policy for compensation as a priority	TKNT support in part, in particular TKNT support the inclusion of an objective and policy on compensation as a priority with particular emphasis placed on Māori land and Māori owned land (general land) on which SNAs may be located	Allow in Part	Whole Part of the provision – objective/policy for compensation as a priority.
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First name: Lucy

Last name: Edwards

On behalf of:

New Zealand Defence Force

Postal address: New Zealand Defence Force, C/- Tonkin + Taylor

Suburb:

City: Wellington

Country: New Zealand

Email: Lucy.Edwards@nzdf.mil.nz

Daytime Phone: 021 934270

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, I will consider presenting a joint case with them at a hearing

Attached Documents

File

PDF - NZDF

Taupō District Plan

Proposed Plan Changes 38-43

Further Submission Form RMA Form 6

Office use

This form will be copied. Please do not print outside the frame.

Please remember that Further Submissions must reach Taupō District Council by 4.30pm on Friday 7 April 2023.

Submitter Details:

Full Name: New Zealand Defence Force.....

Contact person: *(if applying on behalf of an organisation)* Lucy Edwards, Senior Statutory Planner, (Defence Estate and Infrastructure).....

Address for correspondence:.....

New Zealand Defence Force, C/- Tonkin + Taylor, PO Box 2083, Wellington 6140

Phone Number: _____ 021 934 270 _____ Email Address: Lucy.Edwards@nzdf.mil.nz / AGifford@tonkintaylor.co.nz

Further Submitter Relevance: I am: (select one)

- (a) A person representing a relevant aspect of the public interest; or
(b) A person who has an interest in the proposal that is greater than the interest the general public has.

Explain the grounds for saying that you come within category (a) or (b) above:

.....

The New Zealand Defence Force (NZDF) represents a relevant aspect of the public interest¹, and also has an interest in the Proposed Taupo District Plan Changes that is greater than the interest the general public has. NZDF has military interests throughout New Zealand. Although NZDF does not currently operate any facilities in Taupō District, NZDF may develop facilities in the district in the future. NZDF also undertakes Temporary Military Training Activities (TMTA) across New Zealand including in the Taupō District.

NZDF undertakes TMTA as part of its function of maintaining the nation's security and providing for the well-being, health and safety of communities. These activities ensure that NZDF maintains its operational capacity and ability to mobilise and respond to a wide range of emergency or security situations, including search and rescue operations, support and natural disaster relief in the aftermath of events such as Cyclones Hale and Gabrielle, the Canterbury and Kaikoura earthquakes, and support to the Government in the Covid-19 pandemic response. TMTA can include a range of activities, from office/ classroom-based activities to large scale military exercises, and might involve Search and Rescue, infrastructure support (such as deployment of water purification and supply facilities as used in the aftermath of Cyclone Gabrielle), bomb deactivation training, weapons firing, personnel movements, driver training, dog training etc. They may be undertaken over a period of days or weeks on an intermittent or continuous basis, during both day and night.

¹ Set out in section 5 of the Defence Act 1990

The key matter of importance to NZDF is the appropriate provision for TMTA within the Taupō District Plan Changes 38-43.

.....
.....

Public Hearing:

I/we wish to be heard in support of my/our submission: Yes No

If others make a similar submission, I will consider presenting a joint case with them at a hearing: Yes No

Signed:pp Lucy Edwards..... Date: ...19 April 2023.....
(A signature is not required if you make your submission by electronic means.)

Please return completed forms no later than 4.30pm on Friday 7 April 2023 to:

- **“Further Submissions on Plan Changes 38-43”**
Taupō District Council
30 Tongariro Street
Private Bag 2005
Taupō 3352 or
- **e-mail** districtplan@taupo.govt.nz

PLEASE FILL IN YOUR FURTHER SUBMISSION OVERLEAF

Privacy note: When a person or group makes a submission or further submission on Taupō District Plan Change 38-43 this is public information. Please note that by making a submission your personal details, including your name and addresses will be made publicly available under the Resource Management Act 1991. This is because, under the Act, any further submission supporting or opposing your submission must be forwarded to you as well as to TDC. There are limited circumstances when your submission or your contact details can be kept confidential. If you consider you have reasons why your submission or your contact details should be kept confidential please contact us at districtplan@taupo.govt.nz. Please visit our Privacy Policy page for further information.

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 Number (see above)	Submitter Name / Submission Number / (refer to the submission summary report and contact list)	Submission point number	Support? Oppose? Do you support or oppose the original submission point/submission?	Reasons The reasons for my support/opposition are:	Allow? Disallow? Do you seek that council allow/disallow the submission point?	Do you wish all or part of the point to be allowed or disallowed? Please specify if part of the point.
Plan Change 38	Mercury Submitter 68	OS68.4	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	NZDF agrees that conflicts need to be avoided with activities in the wider surrounding environment, not just on adjoining properties. Reverse sensitivity effects do not arise from “existing uses”. They arise from new or expanded sensitive activities locating in proximity to existing uses and can affect the efficient and effective operation of those existing uses.	Allow	The entire submission point: Amend Policy 2.3.3(10) to read as follows: 10. Manage subdivision use and development of land to ensure that it will not: a. ... b. unduly conflict with existing activities on adjoining properties <u>and the surrounding areas</u> , ... d. give rise to reverse sensitivity effects from existing uses
Plan Change 38	Mercury Submitter 68	OS68.10	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	It is appropriate that the Plan provisions include direction that the benefits of nationally and regionally significant infrastructure are to be provided for as well as recognised.	Allow	Part of the submission point as it relates to Policy 2.5.3(2): 2. Recognise and <u>provide</u> for the functional and operational needs associated with the use and

Plan Change 38	Transpower New Zealand Limited Submitter 110	OS110.3	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	<p>It is appropriate that the District Plan and these plan changes include a definition of nationally significant infrastructure. Defence facilities are critical for New Zealand's security and for the safety and well-being of the community. Although NZDF does not currently have major facilities in Taupo District, this does not preclude the need for future defence infrastructure in the district.</p>	Allow	<p>development of nationally and regionally significant infrastructure.</p> <p>Part of the submission point: Add a definition of nationally significant infrastructure.</p>
Plan Change 42	Mercury Submitter 68	OS68.16	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	<p>Objective 3b.2.2 as currently worded would make it difficult for any new development or activity to occur in the General Rural Environment. A rewording of the objective to ensure that development is compatible with the rural character of the zone is more appropriate.</p>	Allow	<p>The entire submission point: Amend Objective 3b.2.2 to read: Maintaining the established General Rural character. <u>The established character of the General Rural Environment is maintained and the cumulative erosion of its character through incremental subdivision and development is avoided.</u> <u>Enable a range of activities in the General Rural Environment that are compatible with rural character.</u></p>
Plan Change 42	Mercury Submitter 68	OS68.24	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	<p>NZDF supports a policy in the General Rural Environment Chapter that seeks to avoid reverse sensitivity effects. However, the policy should be reworded to make it clear that it is the effects of sensitive activities on existing lawfully established activities that is the issue.</p>	Allow	<p>The entire submission point: Amend Policy 3b.2.13 as follows: Avoiding reverse sensitivity. Any adverse effects generated by an new sensitive activity must be <u>located and managed within the allotment</u> so as to avoid <u>adversely affecting reverse sensitivity effects</u></p>

Plan Change 42	Mercury Submitter 68	OS68.64	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	As reverse sensitivity is referenced in the Proposed Plan Changes, it is appropriate that there is a definition within the Taupo District Plan. This should be the definition found in the operative Waikato Regional Policy Statement.	Allow	<p>The entire submission point: Insert a new definition for Reverse Sensitivity as follows: <u>Reverse sensitivity is the vulnerability of a lawfully established activity to a new activity or land use. It arises when a lawfully established activity causes potential, actual or perceived adverse environmental effects on the new activity, to a point where the new activity may seek to restrict the operation or require mitigation of the effects of the established activity.</u></p>
Plan Change 42	Fire and Emergency NZ Submitter 105	OS105.1	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	NZDF is often involved in emergency service activity (e.g. firefighting, search and rescue operations and provision of potable water, including following earthquakes and other natural disasters such as the recent cyclones and floods). There may be an operational or functional need to locate emergency service facilities (which can include defence facilities), and also temporary facilities associated with temporary military training activity in the General Rural and Rural Lifestyle Environments, and the District Plan should enable these activities and facilities.	Allow	<p>The entire submission point: Amend as follows: Objective 3b.2.4 Other activities Maori cultural activities, tourism activities, visitor accommodation, <u>emergency service facilities</u>, and renewable electricity generation and transmission activities are enabled in the General Rural Environment.</p>
Plan Change 42	Fire and Emergency NZ	OS105.2	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	NZDF agrees that activities with an operational or functional need may need to be established	Allow	<p>The entire submission point: Amend Policy 3b.2.9 Maintaining the established character as follows:</p>

	Submitter 105			anywhere in the rural environment. Defence facilities are critical for New Zealand's security and for the safety and well-being of the community. Although NZDF does not currently have major facilities in Taupo District, this does not preclude the need for future defence infrastructure in the district. In addition, NZDF may carry out temporary military training activity in the district.			Maintain the established General Rural Environment character, as defined by: x. <u>Activities with an operational or functional need to locate in the General Rural Environment</u>
Plan Change 42	Transpower NZ Ltd Submitter 110	OS110.2	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	It is appropriate that the District Plan and these plan changes include a definition of regionally significant infrastructure. Defence facilities are critical for New Zealand's security and for the safety and well-being of the community. Although NZDF does not currently have major facilities in Taupo District, this does not preclude the need for future defence infrastructure in the district.	Allow	Part of the submission point: Add a definition of regionally significant infrastructure.	
Plan Change 42	Terry Palmer Submitter 38	OS38.4	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	It is appropriate that the District Plan include district-wide rules for temporary activities to provide consistency and simplicity of plan implementation and compliance. By their nature, temporary activities are of short duration and infrequent and their effects are well understood and able to be managed through standards and rules in the plan. Temporary	Disallow	The entire submission point.	

Plan Change 42	Jamie Dale Submitter 8	OS8.1	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	<p>activities also bring benefits to, and create positive effects for, the district.</p> <p>It is appropriate that the District Plan include district-wide rules for temporary activities to provide consistency and simplicity of plan implementation and compliance. By their nature, temporary activities are of short duration and infrequent and their effects are well understood and able to be managed through standards and rules in the plan. Temporary activities also bring benefits to, and create positive effects for, the district.</p>	Disallow	The entire submission point.
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Organisation:

EnviroNZ

First name: Kaaren**Last name:** Rosser**Postal address:** Private Bag 92801**Suburb:** Penrose**City:** Auckland**Country:** New Zealand**Postcode:** 1642**Email:** kaaren.rosser@environz.co.nz**Daytime Phone:** 027 554 1065

- 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, I will consider presenting a joint case with them at a hearing:

Attached Documents

File
Further Submission Envirowaste 2



Taupō District Plan

Proposed Plan Changes 38-43

Further Submission Form RMA Form 6

Office use box

This form will be copied. Please do not print outside the frame.

Please remember that Further Submissions must reach Taupō District Council by 4.30pm on Friday 7 April 2023.

Submitter Details:

Full Name: EnviroNZ

Contact person: (if applying on behalf of an organisation)

Address for correspondence: Enviro (NZ) Limited | Private Bag 92810, Penrose | Auckland 1642

Phone Number: 0275541065 Email Address: kaaren.rosser@environz.co.nz

Further Submitter Relevance: I am: (select one)

- (a) A person representing a relevant aspect of the public interest; or
(b) A person who has an interest in the proposal that is greater than the interest the general public has.

Explain the grounds for saying that you come within category (a) or (b) above:

As the operator of Council waste and recycling infrastructure in the Taupo area, EnviroNZ has an interest greater than the general public.

Public Hearing:

I/we wish to be heard in support of my/our submission: Yes [X] No []

If others make a similar submission, I will consider presenting a joint case with them at a hearing: Yes [X] No []

Signed: Date: 6.04.23

(A signature is not required if you make your submission by electronic means.)

Please return completed forms no later than 4.30pm on Friday 7 April 2023 to:

- Further Submissions on Plan Changes 38-43
Taupō District Council
30 Tongariro Street
Private Bag 2005
Taupō 3352 or
e-mail districtplan@taupo.govt.nz

PLEASE FILL IN YOUR FURTHER SUBMISSION OVERLEAF

Privacy note: When a person or group makes a submission or further submission on Taupō District Plan Change 38-43 this is public information. Please note that by making a submission your personal details, including your name and addresses will be made publicly available under the Resource Management Act 1991. This is because, under the Act, any further submission supporting or opposing your submission must be forwarded to you as well as to TDC. There are limited circumstances when your submission or your contact details can be kept confidential. If you consider you have reasons why your submission or your contact details should be kept confidential please contact us at districtplan@taupo.govt.nz. Please visit our Privacy Policy page for further information.

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 Number (see above)	Submitter Name / Submission Number / (refer to the submission summary report and contact list)	Submission point number	Support? Oppose? Do you support or oppose the original submission point/submission?	Reasons The reasons for my support/opposition are:	Allow? Disallow? Do you seek that council allow/disallow the submission point?	Do you wish all or part of the point to be allowed or disallowed? Please specify if part of the point.
PC42	Anna Pol	OS10.1	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Those sites within 1.5km of the regional landfill on Broadlands Road (including some sites in Centennial Drive) should not be intensified to reduce reverse sensitivity effects to the landfill.	Disallow	The entire submission point
PC42	Anna Pol	OS10.3	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Those sites within 1.5km of the regional landfill on Broadlands Road (including some sites in Centennial Drive) should not be intensified to reduce reverse sensitivity effects to the landfill.	Disallow	The entire submission point
PC43	Helen Brosnan for Mega Food Services Ltd	OS21.1	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	63 Broadlands Road is sufficiently close to the landfill to be potentially exposed to adverse effects from the operation of the landfill.	Disallow	The entire submission point

PC43	Helen Brosnan for Mega Food Services Ltd	OS21.3	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	63 Broadlands Road is sufficiently close to the landfill to be potentially exposed to adverse effects from the operation of the landfill.	Disallow	The entire submission point
PC42	Hannah Richie for New Zealand Pork Industry Board	OS22.3	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Such a definition would be beneficial to strengthen management of reverse sensitivity issues in the Plan.	Allow	The whole submission point
PC42	Hannah Richie for New Zealand Pork Industry Board	OS22.4	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Support renaming of zone for consistency. Additional description sentence supported.	Allow	The whole submission point
PC42	Hannah Richie for New Zealand Pork Industry Board	OS22.7	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The proposed additional sentence should not be supported unless amended to include regional infrastructure if regional infrastructure includes the regional landfill.	Disallow	That part of the submission point that only refers to primary production activities. Addressing the potential impacts of sensitive activities is supported
PC42	Hannah Richie for New Zealand Pork Industry Board	OS22.8	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The proposed addition restricts the effect of the objective to only primary production activities, whereas there are other activities in the zone which also are also sensitive to reverse sensitivity, such as a landfill. The wording should remain as notified.	Disallow	The whole submission point
PC42	Hannah Richie for New Zealand Pork Industry Board	OS22.9	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The proposed addition should also apply to other activities with the same effects that are lawfully established.	Disallow	That part of the submission point as applying only to primary production activities. Landfills, for example, are also subject to sights, odour and dust.

PC42	Hannah Richie for New Zealand Pork Industry Board	OS22.11	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The use of setbacks is optimal but should be applied to other activities that are affected from reverse sensitivity effects as well.	Disallow	That part of the submission point as only applying to primary production activities.
PC42	Hannah Richie for New Zealand Pork Industry Board	OS22.12	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Activities within the zone should be specified or discretionary.	Disallow	The whole submission point.
PC42	Hannah Richie for New Zealand Pork Industry Board	OS22.14	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The rule should be more nuanced to recognise those industrial and commercial activities that are essentially home occupations to be permitted, with any other industrial or commercial activities being discretionary.	Disallow	That part of the submission point that amends activity status for home occupations to be discretionary in the first instance.
PC42	Hannah Richie for New Zealand Pork Industry Board	OS22.23	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Amendments are required to the proposed reserve sensitivity clauses to allow for regional infrastructure activities that are subject to reverse sensitivity.	Disallow	That part of the submission point only referring to constraining primary production activities under the reverse sensitivity wording.
PC42	Sarah Cameron of Horticulture NZ	OS26.3	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	NZ Planning Standards should be used where possible.	Allow	The whole submission point
PC42	Sarah Cameron of Horticulture NZ	OS26.14	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Support definition for Primary Production which aligns with Planning Standards.	Allow	The whole submission point
PC42	Sarah Cameron of Horticulture NZ	OS26.15	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The proposed definition does not allow for activities that are not horticulture to be defined as subject to reverse sensitivity. Needs to	Disallow	The wording referring to Horticulture New Zealand. The rest of the text should be allowed.

				encompass all situations and should be amended.		
PC42	Sarah Cameron of Horticulture NZ	OS26.20	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Support new objective as it encompasses activities that have a functional need to be located in the rural environment.	Allow	The whole submission point
PC42	Sarah Cameron of Horticulture NZ	OS26.23	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The proposed additional text does not accommodate other activities in the Rural zone that are subject to reverse sensitivity effects. Further amendments are required.	Disallow	The proposed amendment to 3b.2.4
PC42	Sarah Cameron of Horticulture NZ	OS26.27	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The new policy is supported.	Allow	The whole submission point
PC42	Sarah Cameron of Horticulture NZ	OS26.29	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Landfills in the rural environment are also subject to reverse sensitivity.	Disallow	The whole submission point
PC42	Sarah Cameron of Horticulture NZ	OS26.30	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The policy should be further amended to strengthen it and avoid uses that do not need to be in the rural environment	Allow	The whole submission point as relating to amendment to policy 3b.2.14.
PC42	Sarah Cameron of Horticulture NZ	OS26.55	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Subdivision being restricted discretionary is supported. The submitter does not consider that full notification is always warranted.	Allow	That part of the submission that makes a subdivision restricted discretionary up to Matters of Discretion. Not all matters of discretion proposed are supported, nor mandatory notification.
PC42	Sarah Cameron of Horticulture NZ	OS26.56	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that controlled activity subdivision will not achieve outcome to protect effects on highly productive land.	Allow	The whole submission point.
PC43	Joao Paulo of Waikato	OS29.19	<input checked="" type="checkbox"/> Support	Agree regarding the opposing of rezoning. However, if site 4 is rezoned, then only industrial	Allow	The whole submission point.

	Regional Council		<input type="checkbox"/> Oppose	uses should be permitted in the zone that are compatible with potential odour effects from the regional landfill.		
PC43	Joao Paulo of Waikato Regional Council	OS29.20	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Submitter prefers that Site 4 is not rezoned and that subdivision is discretionary within 1.5km buffer of landfill.	Disallow	The whole submission point.
PC38	Joao Paulo of Waikato Regional Council	OS29.27	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that plan changes should be in National Planning Standards format.	Allow	The whole submission point
PC42	Patrick Edwards of Miraka Ltd	OS35.9	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Agree that proposed policy 3b.2.13 does not encompass reverse sensitivity effects generated by existing adjoining land uses on new uses, however proposed new wording needs to be stronger than 'manage'. See Policy B9.2.2 of AUP.	Disallow	That part of the submission point referring to managing subdivision.
PC42	Patrick Edwards of Miraka Ltd	OS35.10	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Support activity status being more than permitted.	Allow	The whole submission point.
PC42	Kirsteen McDonald of Sikka & Aggarwal Investment Ltd	OS43.5	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The land in question should be rezoned rather than objectives and rules amended under the General Rural zone to enable tourism activities further.	Disallow	The whole submission point
PC42	Burke Carlton of CH GP Ltd Trust	OS53.7	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The submitter opposes subdivision where it results in increased lots within 1.5 ha of the regional landfill or other waste infrastructure.	Disallow	The whole submission point
PC42	Helen Brosnan of Permapine Limited	OS56.14	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Proposed additions are not supported unless considered alongside other proposed amendments by EnviroNZ.	Disallow	The whole submission point

PC42	Helen Brosnan of Permapine Limited	OS56.19	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The amendment is not necessary.	Disallow	The whole submission point
PC38	James Ryan	OS57.1	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Support described amendments to Policy 2.3.3	Allow	The whole submission point
PC42	James Ryan	OS57.9	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Reasoning for proposed amendment is acceptable however proposed wording does not allow for those infrastructure activities that have a functional need to be there.	Allow	The whole submission point with additional wording
PC42	James Ryan	OS57.12	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	While it is considered that the objective needs to be reworded for other reasons, any final version of this objective should include consented activities.	Allow	The whole submission point.
PC42	James Ryan	OS57.13	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The proposed wording better reflects the continued functioning of infrastructure. However, if regional waste facilities are not defined as infrastructure then waste facilities should be considered similarly.	Allow	The whole submission point
PC42	James Ryan	OS57.14	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The proposed amendments to Policy 3b.2.9 are generally acceptable however other infrastructure (provided regional waste facilities are defined as infrastructure) needs to be included	Allow	The whole submission point however further amendments are required.

PC42	James Ryan	OS57.15	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The proposed amendments to Policy 3b.2.10 wording will allow the reverse sensitivity effects of residential units to rural uses being acknowledged. However additional wording is necessary to be stronger than limiting residential units.	Allow	The whole submission point, however further amendments are required.
PC42	James Ryan	OS57.16	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that minor residential units are also sensitive activities that should be sited to avoid reverse sensitivity effects.	Allow	The whole submission point.
PC42	James Ryan	OS57.19	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Any final version of this objective should include consented activities.	Allow	That part of the point referring to consented activities.
PC42	James Ryan	OS57.20	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that the objective should be broader that community infrastructure and include all infrastructure which would include a landfill.	Allow	The whole submission point.
PC42	James Ryan	OS57.23	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that minor residential units are also sensitive activities that should be sited to avoid reverse sensitivity effects.	Allow	The whole submission point.
PC42	James Ryan	OS57.25	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	EnviroNZ supports the addition of the wording that allows avoidance of reverse sensitivity matters to be a matter of discretion.	Allow	That part of the submission point referring to amendments under (f).
PC42	James Ryan	OS57.41	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The proposed wording is supported.	Allow	The whole submission point.

PC42	James Ryan	OS57.43	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The reverse sensitivity effects of some home businesses need to be acknowledged.	Allow	The whole submission point.
PC38	Hayley Stronge of Mercury	OS68.3	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The further objective will also benefit separating urban activities from the regional landfill.	Allow	The whole submission point.
PC38	Hayley Stronge of Mercury	OS68.4	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Subdivision effects need to be considered further than the adjoining property. Agree that reverse sensitivity effects do not arise from “existing uses”	Allow	The whole submission point.
PC38	Hayley Stronge of Mercury	OS68.9	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The proposed amendment to strengthen 2.5.1(1) is supported.	Allow	That part of the submission point referring to 2.5.1(1).
PC42	Hayley Stronge of Mercury	OS68.18	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Locating maori cultural activities, tourism activities, <u>and</u> visitor accommodation in appropriate locations is vital to reduce reverse sensitivity effects however this objective can be further strengthened to ensure avoidance of reverse sensitivity occurs to regional infrastructure.	Allow	The whole submission point.
PC42	Hayley Stronge of Mercury	OS68.19	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Any final version of this objective should include consented activities.	Allow	The whole submission point.
PC42	Hayley Stronge of Mercury	OS68.20	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The proposed amendments are supported provided regional waste facilities are defined as infrastructure.	Allow	The whole submission point.
PC42	Hayley Stronge of Mercury	OS68.21	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that wording to not compromise the character of the General Rural Environment is preferable to maintaining the	Allow	That part of the submission point referring to not compromising the character of the zone, along with additional zone defining clauses.

				established character so that new activities can take place in accordance with the described character. Additional clauses are needed to include quarries and landfills.		
PC42	Hayley Stronge of Mercury	OS68.22	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The proposed amendments to Policy 3b.2.10 wording will allow the reverse sensitivity effects of residential units to rural uses to be acknowledged. However additional wording is necessary to be stronger than limiting residential units.	Allow	That part of the submission point up to, but not including (e).
PC42	Hayley Stronge of Mercury	OS68.23	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that minor residential units are also sensitive activities that should be sited to avoid reverse sensitivity effects.	Allow	The whole submission point.
PC42	Hayley Stronge of Mercury	OS68.24	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The proposed wording is supported.	Allow	The whole submission point.
PC42	Hayley Stronge of Mercury	OS68.27	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that direction for zoning Rural Lifestyle areas is necessary in terms of reverse sensitivity issues however this may be best located in the strategic chapter.	Allow	The whole submission point.
PC42	Hayley Stronge of Mercury	OS68.28	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Any final version of this objective should include consented activities.	Allow	That part of the submission point referring to consented activities.
PC42	Hayley Stronge of Mercury	OS68.31	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The proposed amendments are supported provided regional waste facilities are defined as infrastructure.	Allow	The whole submission point.

PC42	Hayley Stronge of Mercury	OS68.34	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that minor residential units are also sensitive activities that should be sited to avoid reverse sensitivity effects.	Allow	The whole submission point.
PC42	Hayley Stronge of Mercury	OS68.36	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	EnviroNZ supports the addition of the wording that allows avoidance of reverse sensitivity matters to be a matter of discretion	Allow	That part of the submission point referring to amendments under (f).
PC42	Hayley Stronge of Mercury	OS68.39	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	EnviroNZ supports the addition of the wording that allows avoidance of reverse sensitivity matters to be a matter of discretion	Allow	The whole submission point.
PC38	Duncan Whyte of Tauhara Quarries Ltd	OS75.3	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The additional wording will allow for waste facilities to be included if not defined as infrastructure.	Allow	The whole submission point.
PC42	Duncan Whyte of Tauhara Quarries Ltd	OS75.4	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	NPS definition for primary production is supported.	Allow	The whole submission point.
PC42	Catriona Eagles of Cheal Consultants	OS79.11	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	NPS definition should be used.	Disallow	The whole submission point.
PC42	Catriona Eagles of Cheal Consultants	OS79.26	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Reverse sensitivity effects need to be acknowledged.	Allow	The whole submission point.
PC42	Catriona Eagles of Cheal Consultants	OS79.33	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Reverse sensitivity effects need to be considered as a matter of discretion.	Allow	That part of the submission point referring to <u>“The effect of the activity on surrounding land uses and how these effects can be managed onsite and/or mitigated”</u> .

PC42	Catriona Eagles of Cheal Consultants	OS79.34	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Reverse sensitivity effects also need to be considered.	Allow	That part of the submission that includes the deletion of the additional assessment criteria.
PC42	Catriona Eagles of Cheal Consultants	OS79.54	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	This would amend inconsistencies.	Allow	The whole submission point.
PC42	Catriona Eagles of Cheal Consultants	OS79.58	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Reverse sensitivity matters should also be considered.	Allow	The whole submission point.
PC38	Alice Lin of Genesis Energy	OS84.2	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The amendments are supported.	Allow	The whole submission point.
PC43	Ashley Sycamore of Dept of Conservation	OS89.21	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	EnviroNZ supports the retention of the existing zoning but for reverse sensitivity reasons in relation to Taupo landfill.	Allow	The whole submission point.
PC38	Colin Guyton of Federated Farmers	OS91.6	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Reverse sensitivity effects need to be recognised from and to different land uses. The proposed wording should be amended to reflect both sides of the issue.	Disallow	That part of the submission pont <u>“infrastructure may have on existing land use activities and to avoid, remedy or mitigate these effects where possible.”</u>
PC38	Mark Crisp of Contact Energy Ltd	OS93.8	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	The further objective will also benefit separating urban activities from the regional landfill.	Allow	The whole submission point.
PC42	Mark Crisp of Contact Energy Ltd	OS93.76	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that this area should not be compromised by an ability to increase and/or intensify the establishment of incompatible rural residential activities	Allow	The whole submission point.
PC43	Mark Crisp of Contact Energy Ltd	OS93.82	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	This outcome would reduce reverse sensitivity effects to the Taupo landfill.	Allow	The whole submission point.

PC42	Mark Crisp of Popeye Development Limited, Taupo Motorsport Park (NZ) Limited trading as Taupo International Motorsport Park and Events Centre (collectively the "Companies")	OS97.1	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Agree that the separation of incompatible land use activities is in accordance with sound planning and resource management practice. Intensification of these sites will potentially lead to increased reverse sensitivity effects.	Allow	The whole submission point.
PC42	Mark Westbrook	SS100.1	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	The location is not suitable for intensification.	Disallow	The whole submission point
PC42	Trudi Burney of Transpower NZ Ltd	OS110.12	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	'Sensitive activities' is a concept that can be applied to many uses subject to reverse sensitivity. Therefore, the reference to (in the National Grid Yard) should be deleted	Disallow	That part of the submission point referring to "in the National Grid Yard".
PC38	Annabelle Lee of Radio NZ Ltd	OS112.1	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Any definition for regional infrastructure would need to include regional landfills.	Allow	The whole submission point

**Organisation:**

McKenzie and Co

First name: Kirsteen**Last name:** McDonald**On behalf of:**

VCard Solutions Limited

Postal address: PO Box 1325**Suburb:****City:** Taupo**Country:** New Zealand**Postcode:** 3351**Email:**

kirsteen.mcdonald@mckenzieandco.co.nz

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.

Consultation Document Submissions

Original Submitter: #57 James Ryan (Private Bag 12055, Tauranga Mail Centre, Tauranga, New Zealand, 3143)

Original Point: #57.1 2.3.3 Policy

Points: FS239.1

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Oppose. The reference at 2.3.3.10(b) to surrounding area is hard to define and inappropriately increases the scope of the 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

Oppose inclusion of 'and the surrounding area'

Attached Documents

File
No records to display.