

First name: Lucy

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On behalf of:
 New Zealand Defence Force

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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
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
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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. As above.	Retain objectives as notified.
2.	Policy 2.5.3.3 and 2.5.3.4			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, including <u>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



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
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 PO Box 2083
 Wellington 6140

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

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.

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Suburb: Acacia Bay
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- I could
 I could not

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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:

Attached Documents

File
TDC DP2022

Taupo District Council District Plan Change

40. Town Centre

I do not support the location of the increased building heights.

1. We have waited years for more connection with the lake via Roberts Street. We finally have a compromise which I look forward to using. Plenty of space to enjoy this special place, yet you plan to allow increased building heights directly adjacent to this area and even higher on the South side of Tuwharetoa Street. I believe this will detract from this area we have yet to use by increasing shading especially in the winter and reducing the ambience by presence of tall overlooking buildings immediately adjacent.
2. This increase of height in this area will block views of buildings further from the lake in the town centre.
3. It is estimated that in the not too distant future there will be at least 800 more vehicles commuting to the town from the Western side of the control gates bridge. Where are they all going to be parked? Our current parking areas are filling fast. I note the current plan re the provision of parking places in the town centre. I believe that before allowing taller buildings and thus more people commuting to town the transport options need to be considered and solved. I note the decline of central Hamilton. There was simply nowhere reasonable to park so we moved to the external malls for shopping. This is already started in Taupo and if access is reduced it will only increase the trend. Remember the parking debacle associated with the log cabin on the lake front where it was considered customers would mainly arrive by bus. Wrong!

We currently have a great compact town centre where I love to shop. Please do not wreck it so it just becomes a food and bar area which may not be pleasant for families.

So first please carefully consider the transport into town. We do not need a second bridge. We need pleasant, safe, alternative walking or cycling routes to the town centre and schools. This could help to meet climate change prevention goals along with a bus service that is more efficient than sitting in your car.

When these transport options have been sorted then allow increased height in the town centre in selected places, but this should be further back from the lake front and have adequate underground parking.

Parking buildings are just plain ugly and expensive. Please do not add these to the most beautiful small town in Aotearoa.

Thank you for the opportunity to comment on the proposals.

Laurie Burdett

First name: Jennifer

Last name: Molloy-Hargreaves

On behalf of:
 Select an option...

Postal address:

Suburb:

City:

Country: New Zealand

Email: jmthth@gmail.com

Daytime Phone: 021588587

- I could
- I could not

Gain an advantage in trade competition through this submission

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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:

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 properties' on three boundaries.

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

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

2nd Submission on Plan Change 42

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

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

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

Yours sincerely

Jennifer Molloy-Hargreaves

First name: Eileen

Last name: Byrne

On behalf of:
Byrne Family Investments Ltd

Postal address: 29 Birch Street

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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 40 - Taupō Town Centre Environment

Points: 20.1

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

Seek amendment

We would like an amendment to the allow Option 4 to stand for everyone.

Include reason(s) for your submission point

Regarding the building heights for Taupo Town Centre. We support Option 4 where the height should be allowed to be all the same regardless of whether the building is on Lake Terrace or back on the other streets.

The building owners should have the descretion to decide on the height that all buildings are permitted to build

to. It should not be that some can and some can't, based on the location of their building.

Attached Documents

File
No records to display.

Organisation:

Waikato Regional Council

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

joapaulo.silva@waikatoregion.govt.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
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Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

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

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



9 December 2022

Taupō District Council
 30 Tongariro Street, Taupō 3330

Email: districtplan@taupo.govt.nz

Private Bag 3038
 Waikato Mail Centre
 Hamilton 3240, NZ

waikatoregion.govt.nz
 0800 800 401

Tēnā koe,

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

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

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

Nāku iti noa, nā,

Tracey May
Director, Science Policy and Information.

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

9 December 2022

Introduction

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

Submitter details

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

Post: Private Bag 3038
Waikato Mail Centre
Hamilton 3240

I could not gain an advantage in trade competition through this submission
I am not directly affected by an effect of the subject matter of the submission that:
(a) does not adversely affect the environment; and
(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://www.environment.govt.nz/nps/nps-hpl)

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/our-work/our-projects/transport/road-crossings/waikato-regional-council-best-practice-guidelines-for-waterway-crossings)

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.

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

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

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

Points: 38.9

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

Delete? Amend?

Seek amendment

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

Include reason(s) for your submission point

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

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

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

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

Attached Documents

File
No records to display.

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Daytime Phone: 021 616 438

I could

I could not

Gain an advantage in trade competition through this submission

I am

I am not

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

a. adversely affects the environment, and

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

Note to person making submission:

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

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

Yes

Additional requirements for hearing:

Attached Documents

File
TDC Plan Change submission TST

Tūwharetoa Settlement Trust Submission 06 December 2022

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

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

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

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

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

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

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- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I am not

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

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

Note to person making submission:

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

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

Yes

Additional requirements for hearing:

None.

Consultation Document Submissions

Provision: Plan Change 39 - Building Coverage - Residential Environment

Points: 46.1

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

Seek amendment

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

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

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

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

Residential Building Coverage

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

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

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

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

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

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

Include reason(s) for your submission point

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

Provision: Plan Change 38 - Strategic Directions

Points: 46.2

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

Seek amendment

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

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

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

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

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

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

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

Benefits include:

drip feeding low level nutrients to the soil gradually

less landfill as some of these systems can compost as well

resilience for the homeowner

reduction in water use for irrigation as household water is recycled

ecologically sound

reduced pressure on existing council wastewater infrastructure

sustainable

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

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

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

Comment on Strategic Directions

2.4 4 Climate Change

Statement

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

2.4.2 Objective

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

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

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

2.4.3 Policy

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

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

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

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

2.4.3 3 As WRC feedback ; Subdivision use land development that encroaches on natural ephemeral waterways, wetlands or 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

Chris Marshall
3/864 Tukairangi Road
RD5
Taupo



First name: Rick

Last name: Keehan

On behalf of:

Enterprise Great Lake Taupo trading as Amplify

Postal address: 32 Roberts Street

Suburb:

City: Taupo

Country: New Zealand

Postcode: 3330

Email: rick@taupo.biz

Daytime Phone: 0211321475

I could

I could not

Gain an advantage in trade competition through this submission

I am

I am not

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

a. adversely affects the environment, and

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

Note to person making submission:

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

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

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

Attached Documents

File
Submission Table - Amplify District Plan Submission 9 December 2022



Submission Table

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

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

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

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

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

 - Plan Change 39 – Residential Building Coverage

 - Plan Change 40 – Taupō Town Centre Environment

 - Plan Change 41- Removal of Fault lines

 - Plan Change 42 – General Rural and Rural Lifestyle Environments

 - Plan Change 43 – Taupō Industrial Environment Rezoning

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

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



First name: Kirsteen
Last name: McDonald

On behalf of:
 McKenzie & Co

Postal address:
Suburb:
City:
Country: New Zealand

Email:
 kirsteen.mcdonald@mckenzieandco.co.nz

Daytime Phone: 021563066

- I could
 I could not

Gain an advantage in trade competition through this submission

- 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 40 - Taupō Town Centre Environment > Planning Maps

Points: 61.1

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

Include reason(s) for your submission point

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

Points: 61.2

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

Delete? Amend?

Support

Include reason(s) for your submission point

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

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

Points: 61.3

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

Amend?

Support

Retain

Include reason(s) for your submission point

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

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

Points: 61.4

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

Amend?

Seek amendment

Amend wording to simplify.

Include reason(s) for your submission point

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

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

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

Points: 61.5

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

Amend?

Support

Include reason(s) for your submission point

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

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

Include reason(s) for your submission point

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

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

Include reason(s) for your submission point

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

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

Include reason(s) for your submission point

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

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

Include reason(s) for your submission point

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

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

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

Include reason(s) for your submission point

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

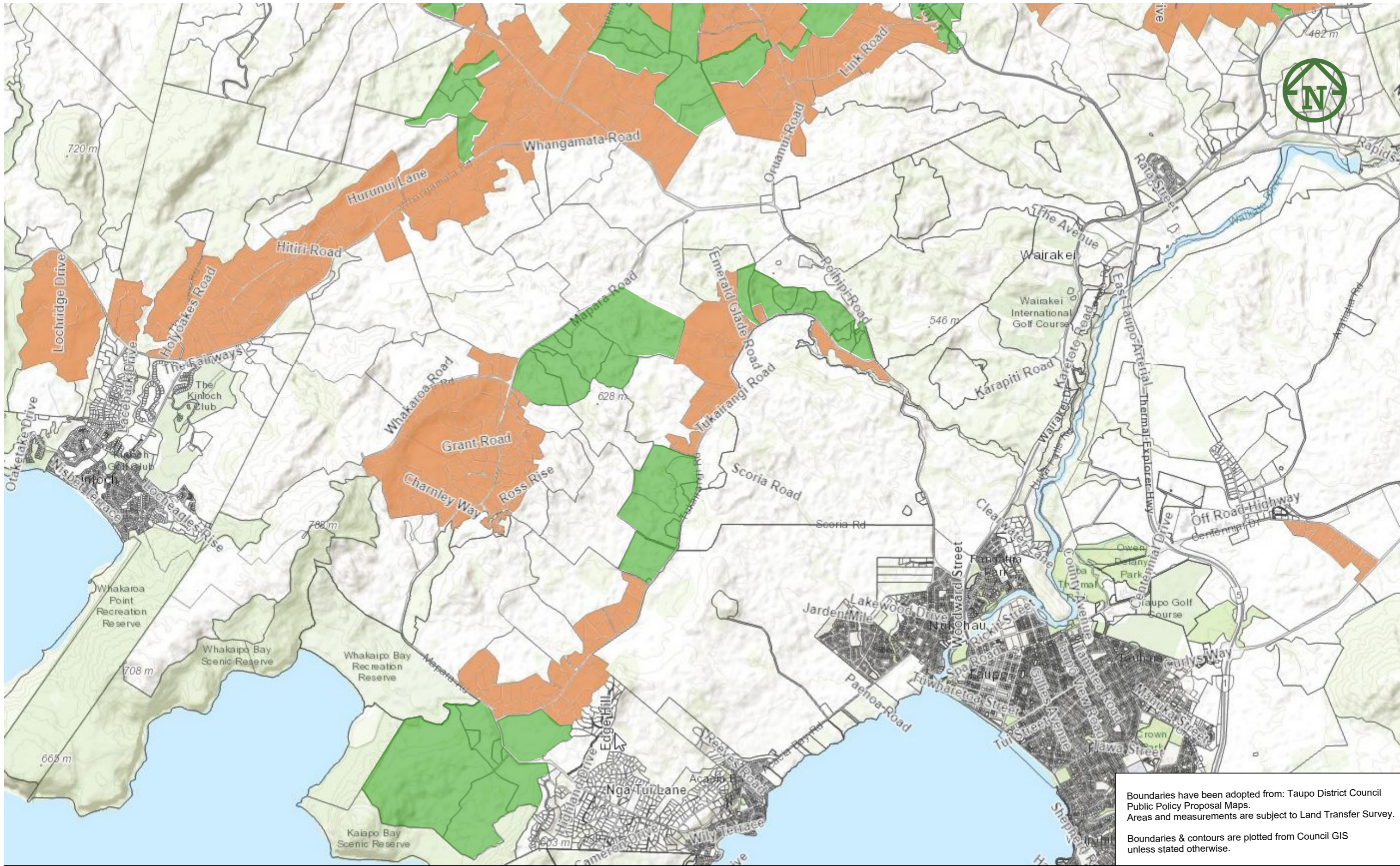
Land is favourable for development as Lifestyle blocks due to size of property, location, topography and soil

quality.

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

Attached Documents

File
3267-1000
3267-1001



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

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

CLIENT: PROJECT: TITLE: PURPOSE OF ISSUE:



McKenzie & Co

PLAN CHANGE SUBMISSION

PROPOSED EXTENSION OF LIFESTYLE ZONING

INFORMATION

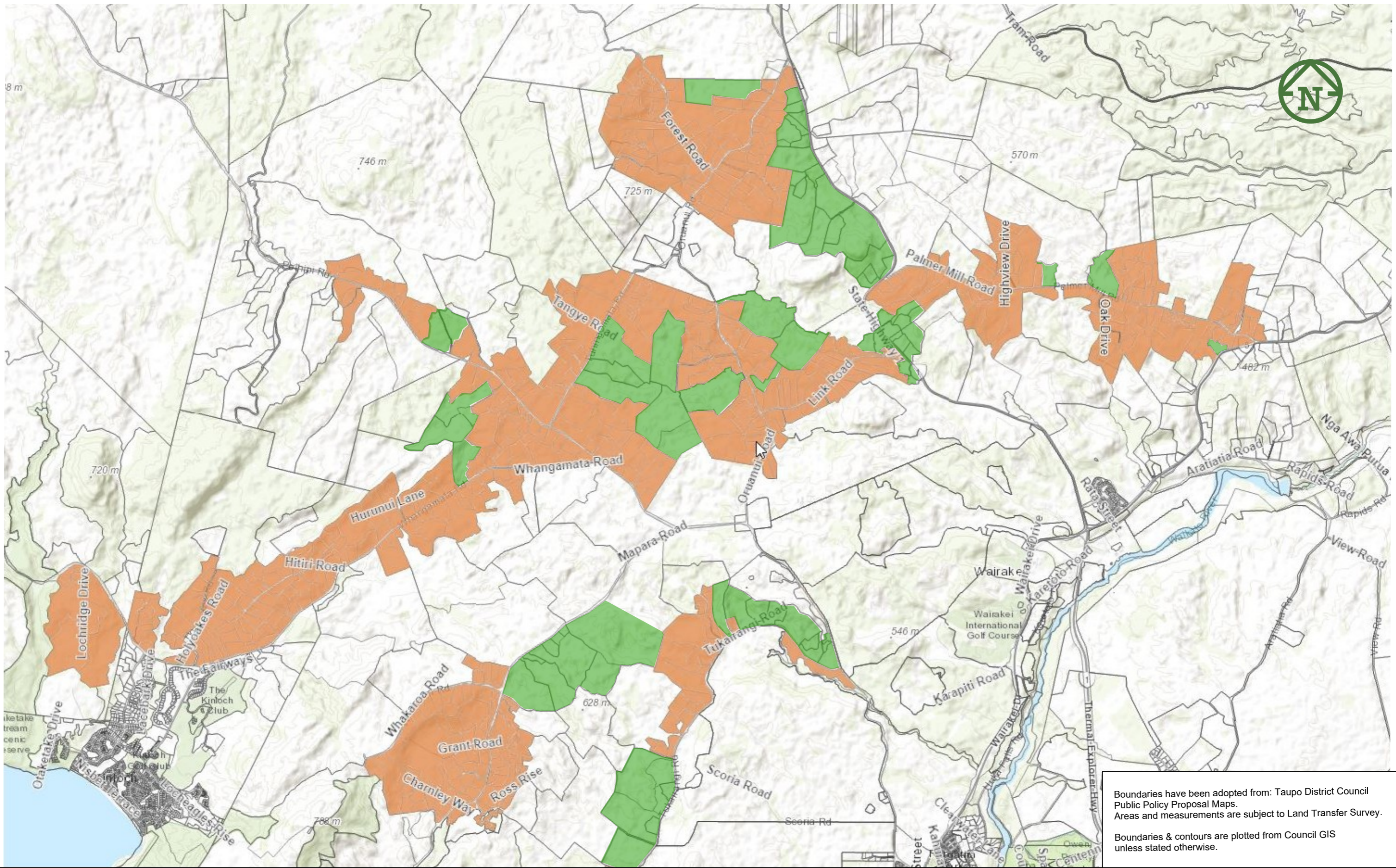
SCALE: 1:3500 @A3

DO NOT SCALE

DRAWING NO: 3267-1000

REV: A

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



CLIENT: PROJECT: TITLE: PURPOSE OF ISSUE:



McKenzie & Co

PLAN CHANGE SUBMISSION

PROPOSED EXTENSION OF LIFESTYLE ZONING

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

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

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

Daytime Phone: 0273895278

- I could
 I could not

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:

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.

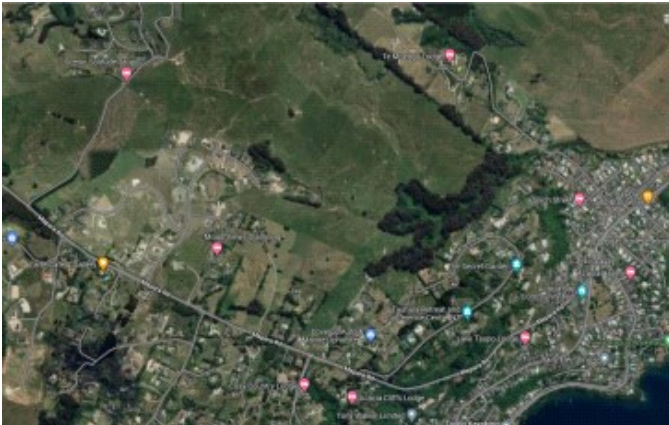
There is no public transport from Palmer Mill Road into town.

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.

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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
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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
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"> • • • • •
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.3.1 Maintaining the Character of Rural Lifestyle Environment	Oppose	Delete as it will change the character of the area.	<p>Produce rates at subdivi prohibi TDC p owner - unecon</p> <ul style="list-style-type: none"> • Con adve the l com <p>Fragme peacefu tenuous: reducti and hea due to c more d</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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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.
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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.

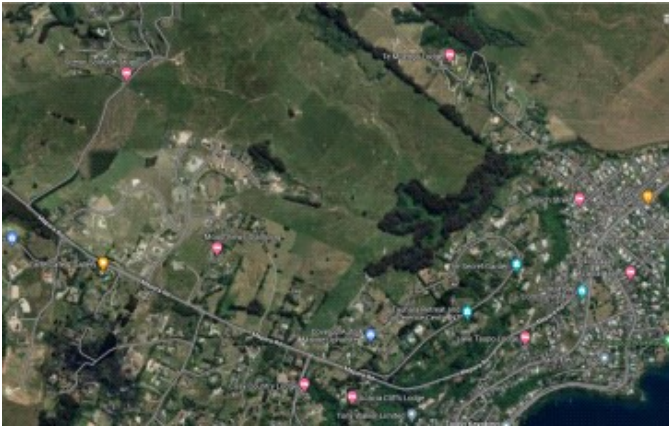
There is no public transport from Palmer Mill Road into town.

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

- 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
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?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision: Plan Change 39 - Building Coverage - Residential Environment

Points: 79.1

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

Support

Retain

Include reason(s) for your submission point

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

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

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

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

Seek amendment

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

g.1.9 Maximum Building Height

The maximum height of any building shall be as follows:

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

4g.1.10 Taupō Town Centre Environment

Environment

Height Overlay

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

Include reason(s) for your submission point

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

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

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

Amend?
Support

Include reason(s) for your submission point

Removing rules for verandahs on service lanes makes sense.

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

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

Amend?
Support

Include reason(s) for your submission point

Removing rules for verandahs on service lanes makes sense.

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

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

Amend?
Support

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

Include reason(s) for your submission point

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

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

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

Amend?
Seek amendment

Amend

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

Include reason(s) for your submission point

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

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

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

Amend?
Seek amendment

Include reason(s) for your submission point

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

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

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

Points: 79.8

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

Seek amendment

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

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

Include reason(s) for your submission point

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

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

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

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

Seek amendment

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

Include reason(s) for your submission point

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

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

Points: 79.10

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

Seek amendment

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

Include reason(s) for your submission point

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

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

Points: 79.11

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

Seek amendment

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

Include reason(s) for your submission point

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

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

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

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

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

Points: 79.12

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

Delete? Amend?

Seek amendment

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

Include reason(s) for your submission point

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

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

Points: 79.13

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

Amend?

Seek amendment

Amend

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

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

Include reason(s) for your submission point

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

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

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

Points: 79.14

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

Amend?

Seek amendment

Delete Rule 4b.2.8

Include reason(s) for your submission point

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

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

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

Amend?

Seek amendment

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

Include reason(s) for your submission point

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

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

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

Amend?

Support

Include reason(s) for your submission point

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

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

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

Amend?

Seek amendment

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

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

Include reason(s) for your submission point

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

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

Points: 79.18

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

Seek amendment

Amend through the addition of assessment criteria for this rule

Include reason(s) for your submission point

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

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

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

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

Points: 79.19

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

Oppose

Delete

or

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

Include reason(s) for your submission point

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

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

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

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

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

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

Include reason(s) for your submission point

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

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

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

Amend

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

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

Include reason(s) for your submission point

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

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

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

delete

Include reason(s) for your submission point

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

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

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

Points: 79.23

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

Support

Include reason(s) for your submission point

provides for additional housing for Maori

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

Points: 79.24

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

Support

Include reason(s) for your submission point

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

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

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

Points: 79.25

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

Seek amendment

Amend

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

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

Include reason(s) for your submission point

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

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

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

Amend?

Seek amendment

Amend

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

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

Include reason(s) for your submission point

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

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

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

Amend?

Seek amendment

Include reason(s) for your submission point

Clarity is needed here for Rural industry associated commercial activities

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

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

Amend?
Seek amendment

Amend

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

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

Include reason(s) for your submission point

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

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

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

Amend?
Seek amendment

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

Include reason(s) for your submission point

Are managed how?

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

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

Amend?
Seek amendment

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

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

Include reason(s) for your submission point

This policy should also reflect the provision of minor units

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

Points: 79.31

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

Support

Include reason(s) for your submission point

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

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

Points: 79.32

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

Oppose

delete

OR

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

Include reason(s) for your submission point

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

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

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

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

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

and retail activities

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

Seek amendment

Delete or

amend

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

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

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

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

Include reason(s) for your submission point

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

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

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

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

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

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

production and rural industry

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

Seek amendment

amend

4b.1.10 Intensive indoor primary production and rural industry

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

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

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

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

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

Include reason(s) for your submission point

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

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

Points: 79.35

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

Support

Include reason(s) for your submission point

greater provision for rural industry

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

Points: 79.36

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

Include reason(s) for your submission point

greater provision for rural industry

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

Points: 79.37

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

Include reason(s) for your submission point

greater flexibility for rural industry

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

Points: 79.38

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

Amend proposed rule 4b.2.6 with

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

And

Amend to include

4b.1.11 Building setback

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

-

Include reason(s) for your submission point

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

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

Points: 79.39

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

Seek amendment

Either

a.delete the rule

or

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

or

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

or

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

Include reason(s) for your submission point

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

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

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

Points: 79.40

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

Delete? Amend?

Seek amendment

4b.2.7Minor residential units

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

1. All minor residential or accommodation activity units shall:

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

Include reason(s) for your submission point

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

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

Points: 79.41

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

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

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

Points: 79.42

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

Seek amendment

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

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

Include reason(s) for your submission point

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

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

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

Seek amendment

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

Include reason(s) for your submission point

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

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

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

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

Seek amendment

Include reason(s) for your submission point

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

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

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

Seek amendment

amend

4b.3.7 High voltage transmission lines

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

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

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

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

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

Include reason(s) for your submission point

remove the second set of assessment criteria as being unrelated

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

Points: 79.46

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

Oppose

same relief sought as noted against Rule 4b.2.1

Include reason(s) for your submission point

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

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

Points: 79.47

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

Support

Include reason(s) for your submission point

Greater flexibility for buildings

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

Points: 79.48

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

Support

Include reason(s) for your submission point

Greater flexibility for buildings

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

Points: 79.49

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

Seek amendment

we seek clarification how this relates to Areas x & y

Include reason(s) for your submission point

we seek clarification how this relates to Areas x & y

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

Points: 79.50

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

Support

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

Include reason(s) for your submission point

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

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

Points: 79.51

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

Seek amendment

amend

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

Include reason(s) for your submission point

Clarify rules for other buildings

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

Points: 79.52

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

Oppose

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

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

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

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

Include reason(s) for your submission point

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

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

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

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

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

Points: 79.53

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

Amend?**Seek amendment****Include reason(s) for your submission point**

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

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

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

Amend?**Seek amendment**

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

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

Include reason(s) for your submission point

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

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

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

Amend?**Seek amendment**

amend

Amend as follows**4b.5.3 Subdivision - Rural Lifestyle Environment that does not adjoin the General Rural Environment**

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

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

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

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

Include reason(s) for your submission point

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

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

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

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

Seek amendment

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

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

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

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

Include reason(s) for your submission point

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

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

Points: 79.57

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

Seek amendment

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

Include reason(s) for your submission point

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

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

Points: 79.58

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

Seek amendment

amend to include assessment criteria or provide policy direction similarly.

4b.5.9 Subdivision - More than 12 allotments

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

Assessment Criteria

1. Adequacy of road legal and formed width

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

3. the consideration for connectivity or future connectivity

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

-

Include reason(s) for your submission point

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

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

Attached Documents

File

No records to display.



First name: Julie

Last name: McLeod

On behalf of:
Towncentre Taupo Board

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Suburb:

City: Taupo

Country: New Zealand

Postcode: 3330

Email: julie@towncentretaupo.co.nz

Daytime Phone: 021415231

- 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 40 - Taupō Town Centre Environment > 3s Taupō Town Centre Environment > Policies **Points: 86.1**

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

Include reason(s) for your submission point

Towncentre Taupo (TCT) agrees that is important to allow temporary activities on the Tongariro Domain as these increase vibrancy in the Taupo town centre. TCT would not like to see activities that compete directly with shops, restaurants, cafes and services in the Taupo town centre. TCT would not like to see activations that require road closures, which are hugely disruptive to movement around town and negatively impact trade at town centre businesses.

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.2 Land Use Rules **Points: 86.2**

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

Include reason(s) for your submission point

TCT believes the changes will support activation of TDC managed spaces.

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.1 Performance Standards > 4g.1.9 Maximum Building Height **Points: 86.3**

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

Towncentre Taupo does not agree with the Height Overlays in the planning map.

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.1 Performance Standards > 4g.1.10 Taupō Town Centre Environment Height Overlay **Points: 86.4**

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

Towncentre Taupo does not agree with the Height Overlays in the planning map.

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.1 Performance Standards > 4g.1.16 Verandas **Points: 86.5**

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

Include reason(s) for your submission point

Provision: Plan Change 40 - Taupō Town Centre Environment > 4g Taupō Town Centre Environment > 4g.4 Assessment Criteria **Points: 86.6**

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

**Amend?
Support**

Include reason(s) for your submission point

Towncentre Taupo supports the change with the understanding that urban design principals are applied in these situations and not brushed over.

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

Points: 86.7

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

Towncentre Taupo would like to see the following amendments made to Height Overlay on the planning map.

1. More opportunity for higher buildings across the whole of the CBD, not just the areas indicated on the map. This would allow for a staggered approach across town rather than a row of high buildings just on Tuwharetoa Street. This would also encourage investment in areas that would be disadvantaged by the current height overlay restrictions.
 2. Maximum height of 6 stories, rather than a height measurement, across the entire CBD. This would allow for buildings of different heights in the same street.
 3. Buildings over 4 stories high should be subject to urban design assessment criteria to make sure there is a variation in the design of the buildings and rooflines, avoiding a flat boxy roofline.
-

Provision: Plan Change 40 - Taupō Town Centre Environment > Section 32

Points: 86.8

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

Towncentre Taupo would like to see the following amendments made to Height Overlay on the planning map.

1. More opportunity for higher buildings across the whole of the CBD, not just the areas indicated on the map. This would allow for a staggered approach across town rather than a row of high buildings just on Tuwharetoa Street. This would also encourage investment in areas that would be disadvantaged by the current height overlay restrictions.
 2. Maximum height of 6 stories, rather than a height measurement, across the entire CBD. This would allow for buildings of different heights in the same street.
 3. Buildings over 4 stories high should be subject to urban design assessment criteria to make sure there is a variation in the design of the buildings and rooflines, avoiding a flat boxy roofline.
-

Attached Documents

File
No records to display.

First name: Jane
Last name: Penton

On behalf of:
 LWAG

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Suburb:
City: Taupo
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 :

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- 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 :

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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:

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>

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</u> the primary commercial, retail, recreational, cultural and</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

Organisation:

Te Kotahitanga o Ngati Tuwharetoa

First name: George**Last name:** Asher**Postal address:****Suburb:****City:****Country:** New Zealand**Email:** geoera@xtra.co.nz**Daytime Phone:** 021 368566

- I could
- I could not

Gain an advantage in trade competition through this submission

- I am
- I am not

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

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

Note to person making submission:

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

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

Yes

Additional requirements for hearing:

Attached Documents

File
PDF - District Plan Submission - TKNT

Submission by Te Kotahitanga o Ngāti Tuwharetoa (TKNT) on Taupo District Council Plan Changes 38 to 43

Introduction:

TKNT was established in 2017 to receive, manage, hold and administer, and implement to implement the settlement redress on behalf of the 26 hapū of Ngāti Tūwharetoa.

TKNT is the mandated iwi authority for Ngāti Tūwharetoa to act as the representative of Ngāti Tūwharetoa in dealing with the Crown, local and regional authorities, other iwi and other external agencies. Its membership is made up of Te Ariki of Ngāti Tuwharetoa and a delegate and alternate member of each of the 26 hapū of Ngāti Tuwharetoa.

Te Poari Mahi (TPM) is the advisory Board for Te Kotahitanga of Ngāti Tuwharetoa.

This submission is made pursuant to requirements of the Resource Management Act 1991. TKNT acknowledge, however, that comments made in respect of Plan Changes 38 to 43 of the District Plan are heavily influenced by the provisions of the Ngāti Tuwharetoa Claims Settlement Act 2018 (the **Settlement Act**) and the preceding Deed of Settlement, 2017.

Of particular importance to TKNT is that the plan changes reflect the vision and values represented by **Nga Pou e Toru**, three pou or pillars that represent the aspiration of Ngāti Tuwharetoa to ensure a healthy Rohe of Ngāti Tuwharetoa (also known as the Area of Interest of Ngāti Tuwharetoa) that is capable of sustaining the well-being of the whole community.

A key intention of the Settlement Act is to enhance Ngāti Tūwharetoa capability and capacity to achieve beneficial environmental and resource management outcomes for the Taupō catchment and the Rohe of Ngāti Tuwharetoa. To achieve this outcome, it is necessary to ensure that the kawa, tikanga, values and mātauranga of Ngāti Tūwharetoa is respected within the policies and plans that shape the decisions relating to the Taupō catchment.

Te Kōpu ā Kānapanapa

The Ngāti Tūwharetoa Claims Settlement Act 2018 provides for the establishment of a statutory joint committee, **Te Kōpu ā Kānapanapa**, whose function is to:

- restore, protect and enhance the environmental, cultural and spiritual wellbeing of the Taupō catchment
- provide strategic leadership on the sustainable and integrated management of the environment in the Taupō catchment
- provide a mechanism for Ngāti Tūwharetoa to exercise mana and kaitiakitanga over the Taupō catchment in partnership with local government.

The joint committee draws membership from Te Kotahitanga o Ngāti Tūwharetoa, Waikato Regional Council and Taupō District Council.

Te Kōpu ā Kānapanapa is focussed primarily on te taiao restoration, protection, and enhancement within the catchment, however, it must also provide for the health, well-being and prosperity of all members of the community including future generations. These functions embody the intent and meaning set out within the three pillars of **Nga Pou e Toru**.

One of the functions of Te Kōpu ā Kānapanapa is to prepare and approve **Te Kaupapa Kaitiaki**, the high-level plan for the Taupo catchment. Te Kaupapa Kaitiaki gives expression to the vision, objectives, desired outcomes, values, significant issues, and other relevant matters within the Taupo catchment, all matters that Te Kōpu ā Kānapanapa must give effect to.

The statutory requirements of Te Kaupapa Kaitiaki are set out in Sections 181-182 of the Settlement Act. These sections state that, in preparing, reviewing, varying, or changing a regional policy statement, regional plan or district plan (including a proposed policy statement or plan), a local authority must **recognise and provide for** the vision, objectives, values, and desired outcomes in Te Kaupapa Kaitiaki.

RECOMMENDATION 1:

That the objectives and policies of the strategic directions and Plan Changes 38 to 43 recognise and provide for the vision, objectives, values, and desired outcomes in Te Kaupapa Kaitiaki as set out within Section 181 of the Settlement Act.

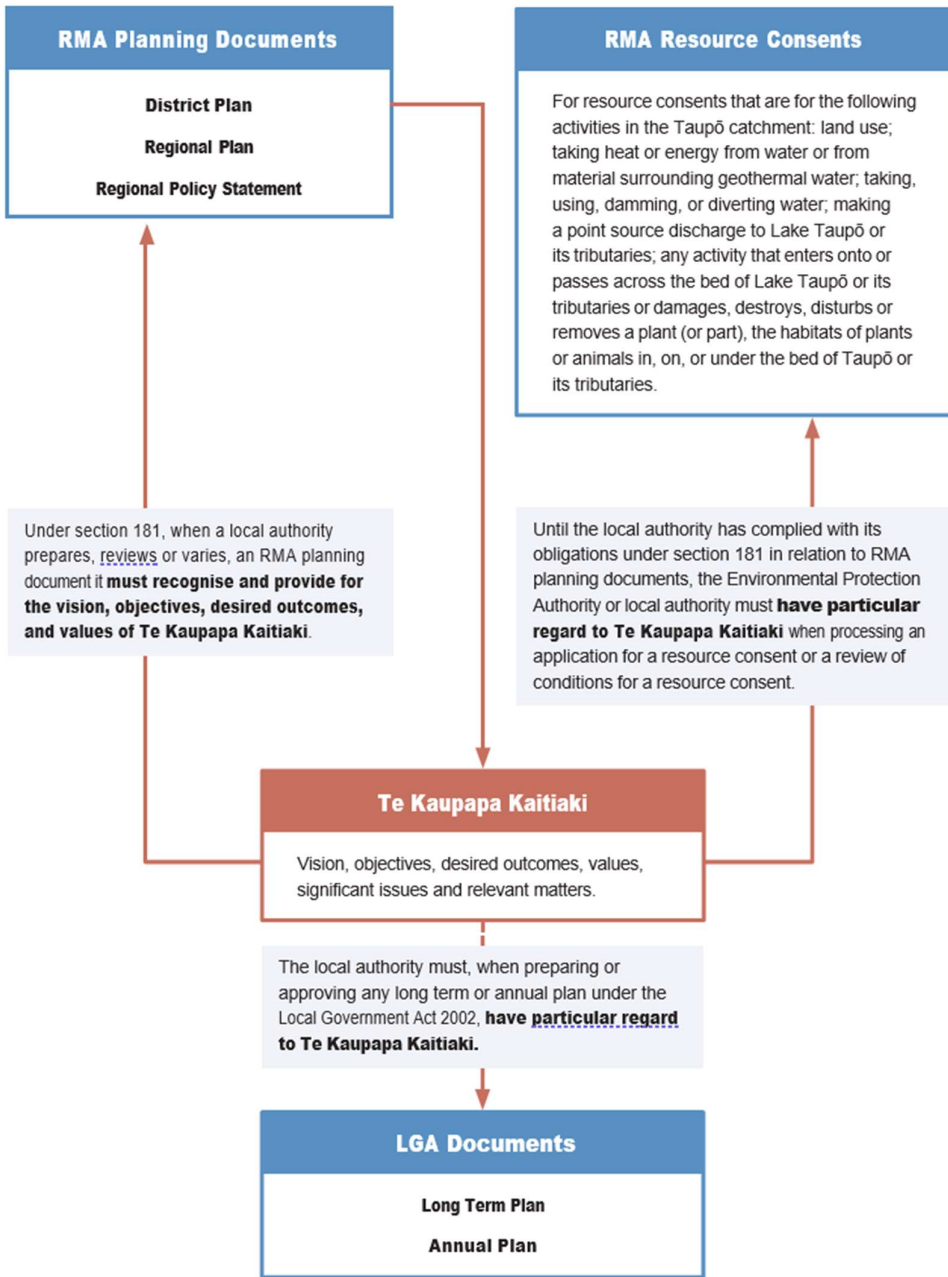
In addition, whenever a consent authority (Taupo District Council) is processing or making a decisions on an application for resource consent (including any review of the conditions of a resource consent) the consent authority must **have particular regard to** the vision, objectives, values, and desired outcomes in Te Kaupapa Kaitiaki. This applies particularly to consents for the following activities, within the Taupō catchment:

- i) using land:
- ii) taking heat or energy from water:
- iii) taking heat or energy from the material surrounding geothermal water:
- iv) taking, using, damming, or diverting water:
- v) making a point source discharge to Lake Taupō or its tributaries:
- vi) any activity that enters onto or passes across the bed of a lake or river or damages, destroys, disturbs or removes a plant (or part), the habitats of plants or animals in, on, or under the bed of Lake Taupō or its tributaries.

Figure 1(below) illustrates the significant requirements of local authorities with respect to Te Kaupapa Kaitiaki.

Figure 1(Reference – *Te Kaupapa Kaitiaki – Taupo Catchment Plan p.15*)

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 ora (well-being) of all freshwater bodies, their ecosystems, habitats, indigenous species and trout. Some riparian ‘protection strips’ exceeded 500 metres in width to ensure that these waterways were fully protected from runoff, siltation, erosion and physical damage. A much smaller proportion of land within the forests was set aside to protect wāhi tapu, sites and landscapes of special importance and related taonga tuku iho (indigenous forests, mahinga kai, kainga settlements).

The obligation to ensure the health and well-being of the land and waters (manāki whenua, manāki wai Māori) and to secure their relationship with their whenua was the first priority of the landowners. Only after this was accomplished, were they comfortable to turn their attention to developing a world class commercial forestry venture. These forests are unique in NZ and globally insofar as they are characterised as multi-purpose forests that demonstrate deliberately designed attributes of water management, climate change mitigation and adaptation, cultural spiritual and social and environmental outcomes as well as fulfilling highly successful commercial objectives. Achieving these multiple goals for thousands of owners in over 140 separate blocks of privately owned Māori land may appear to many to be a formidable challenge, however, its success was in no small way attributed to insightful leadership and an adherence to Ngati Tuwharetoa kawa, tikanga and mātauranga.

SUBMISSION SPECIFIC TO PAPA KĀINGA - PLAN CHANGE 42 – THE GENERAL RURAL AND RURAL LIFESTYLE ENVIRONMENTS.

RECOMMENDATION 16

1. That TKNT support the deletion of the previous definition in the Taupo District Plan for Papakāinga and support the new definition of Papakāinga.
2. That TKNT support the proposal to split the rural environment into two zones, namely the General Rural Environment and the Rural Lifestyle Environment.
3. That TKNT generally support the Proposed Objectives and the Proposed Policy.
4. That TKNT generally commend the progress that has been made by TDC in developing the rural rules affecting Papakāinga, however, TKNT note to TDC that it is in the early stages of developing its kainga programme including Papakāinga and recommends that TKNT, prospective home owners' and TDC hold further discussions prior to the finalisation of detailed rules for Papakāinga.
5. That TKNT note that innovative Papakāinga performance standards are being proposed and implemented in many local authorities in NZ that are not yet available under the proposed TDC performance standards.
6. That in view of its being in the early stages of developing its kainga programme, including Papakāinga, TKNT recommend that prospective home owners' and TDC hold further discussions prior to the finalisation of detailed performance standards for Papakāinga.
7. That TKNT oppose the stringent performance standards proposed for maximum building coverage and recommend that it be increased for Papakāinga.
8. That TKNT oppose the proposed minimum building setbacks of 15m and recommend that consideration be given for prospective Papakāinga owners to reduce their requirements for minimum building setback.
9. TKNT commend TDC for the progressive changes it has made to accommodate Papakāinga in the Taupo District.

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First name: Julie

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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

Original Submitter: #9 Lucy Edwards (C/- Tonkin & Taylor Ltd , Wellington, New Zealand, 6140)

Original Point: #9.4 4g.2 Land Use Rules

Points: FS202.1

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

Military training activities are inappropriate in the Taupo CBD 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:

Disallow

Whole provision

Original Submitter: #12 Laurel Burdett (202 Mapara Road, 3385)
Original Point: #12.2 Planning Maps

Points: FS202.2

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

As per the Towncentre Taupo original submission, we support the increase in building heights and would like to see more opportunity for higher buildings across the town centre.

Do you 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

Whole principle

Original Submitter: #20 Eileen Byrne (29 Birch Street, Hilltop, Taupo, New Zealand, 3330)
Original Point: #20.1 Planning Maps

Points: FS202.3

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

As per the Towncentre Taupo original submission, we support the increase in building heights and would like to see more opportunity for higher buildings across the town centre.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

Whole principle

Original Submitter: #40 Sean te Heuheu (PO Box 1845, Taupo, New Zealand, 3351)
Original Point: #40.8 4g.1.10 Taupō Town Centre Environment Height Overlay

Points: FS202.4

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

As per the Towncentre Taupo original submission, we support the increase in building heights and would like to see more opportunity for higher buildings across the town centre. As such applications will be assessed against urban design principles and the merits of the surrounding environment, we do not believe public notification is 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

Whole principle.

Original Submitter: #40 Sean te Heuheu (PO Box 1845, Taupo, New Zealand, 3351)
Original Point: #40.9 4g.1.10 Taupō Town Centre Environment Height Overlay

Points: FS202.5

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

As per the Towncentre Taupo original submission, we support the increase in building heights and would like to see more opportunity for higher buildings across the town centre. As such applications will be assessed against urban design principles and the merits of the surrounding environment, we do not believe public notification is 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

Whole principle

Original Submitter: #46 Chris Marshall (, New Zealand)

Original Point: #46.4 Plan Change 40 - Taupō Town Centre Environment

Points: FS202.6

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

As per the Towncentre Taupo original submission, we support the increase in building heights and would like to see more opportunity for higher buildings across the town centre.

Do you 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

Whole principle

Original Submitter: #55 Rick Keehan (32 Roberts Street, Taupo, New Zealand, 3330)

Original Point: #55.2 4g.1.9 Maximum Building Height

Points: FS202.7

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

As per the Towncentre Taupo original submission, we support the increase in building heights and would like to see more opportunity for higher buildings across the town centre.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

Whole principle with amendments to increased heights across the CBD.

Original Submitter: #61 Kirsteen McDonald ()

Original Point: #61.4 4g.1.10 Taupō Town Centre Environment Height Overlay

Points: FS202.8

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

As per the Towncentre Taupo original submission, we support the increase in building heights and would like to see more opportunity for higher buildings across the town centre. As such applications will be assessed against urban design principles and the merits of the surrounding environment, we do not believe a resource consent is 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

Whole principle

Original Submitter: #63 Debs Morrison (58 Palmer Mill Road, Wairakei, Taupo, New Zealand, 3384)

Original Point: #63.6 Plan Change 40 - Taupō Town Centre Environment

Points: FS202.9

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

As per the Towncentre Taupo original submission, we support the increase in building heights and would like to see more opportunity for higher buildings across the town centre.

Do you 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

Whole principle

Original Submitter: #65 Richard Thompson (58 Palmer Mill Road, Wairakei, Taupo, New Zealand, 3384)

Original Point: #65.5 Plan Change 40 - Taupō Town Centre Environment

Points: FS202.10

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Oppose

As per the Towncentre Taupo original submission, we support the increase in building heights and would like to see more opportunity for higher buildings across the town centre.

Do you 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

Whole principle

Original Submitter: #104 Gurv Singh (PO Box 2628, Wellington, New Zealand, 6140)

Original Point: #104.11 4g.1.9 Maximum Building Height

Points: FS202.11

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

As per the Towncentre Taupo original submission, we support the increase in building heights and would like to see more opportunity for higher buildings across the town centre.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

Whole principle

Original Submitter: #104 Gurv Singh (PO Box 2628, Wellington, New Zealand, 6140)

Original Point: #104.12 4g.1.10 Taupō Town Centre Environment Height Overlay

Points: FS202.12

Do you support or oppose the original submission point/submission?

Please state the reasons for your support/opposition:

Support

As per the Towncentre Taupo original submission, we support the increase in building heights and would like to see more opportunity for higher buildings across the town centre.

Do you seek that council allow/disallow the submission point?

Please specify the provision or part of the provision that you would like allowed or disallowed:

Allow

Whole principle

Attached Documents

File
No records to display.